Appendix 3

Representations made to the Wyre Forest District Local Plan 2016-2036 Pre Submission Publication Document (October 2018) in accordance with Regulation 20 (2) of The Town and Country Planning (Local Planning) (England) Regulations 2012

Consultation Period November/December 2018

APPENDIX 3: TABLE OF CONTENTS

Appendix 3 details the summary of responses received to the Local Plan Review Pre-Submission Publication Consultation document (October 2018)

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO: WHOLE DOCUMENT

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Hambrey Jeanette	LPPS1	whole	Yes	Yes	Yes		I support the local plan in this form as the sites stated at Comberton and Lea Castle will be able to cope with the added population growth. The infrastructure for schools and roads are good in these areas. I very much disagree with any extra housing going on the Spennells estate as these roads simply cannot cope with any further population growth due to there only being two exits off the estate which are already congested at prime times of the day, the school at Heronswood would also not be able to cope with the growth and has no room for expansion. We should not use any Green Belt unless absolutely necessary and only in exceptional circumstance, the Green Belt at the rear of Spennells lies between two parishes and I feel strongly that these two communities should not be joined. There are also rare birds that nest in the fields rear of Spennells such as the corn bunting which is under threat and desperately needs nesting grounds to be left completely alone. Lea castle has been developed on prior and is therefore a good choice for housing with the added advantage of a new school as the plan has set out. Comberton Estate has three schools already present and these can be expanded upon to cope with the extra children expected from the new houses, there are also good transport links to main routes from this area.		No	
Holt Sally	LPPS3	All	Yes	Yes	Yes		No comments.			
Jackson Chris	LPPS21	Policy 34	Yes	Yes	Yes		I am very happy to support this plan, particularly as the latest revision has listened to various groups who have been campaigning to have country spaces west of the Severn, NOT listed as areas for potential development. In particular, the friends of Highclere residents association has been able to have its voice heard and I know this group is particularly please that a voice of reason has been heard. I personally feel the plan is now well balanced and proportionate and I am happy now to support it.			
Sadler Nigel	LPPS47	All the local plan	No	No	No	Positively Prepared Justified Effective	I object to the local plan because it places too much emphasis on two huge developments on the east side of Kidderminster. Particularly the “Lea Castle village” proposal, which will fundamentally change the character of the small communities of Cookley, Broadwaters, Hurcott and the Horsefair and create intense traffic and congestion pressure to the area. Local communities and villages should have their individual		Yes	

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							characters protected at all cost and the physical separation from larger towns maintained. The developments are not designed for local people but will become dormitory towns for people wishing to commute to Birmingham, Worcester, Wolverhampton and onwards via the M5. This will put increased strain on inadequate road systems passing through already congested areas, such as Blakedown, Hagley, Stourbridge, and the Worcester Road. As well as traffic congestion and associated pollution, such high concentrations of development will encourage an increase in the incidence of crime and social disruption. It will also seriously compromise existing wildlife habitat and amenity areas in the local historic communities. If the estimated housing requirements are truly realistic, it would be more acceptable if any development was done in pockets on a reduced scale and distributed throughout the entire area. This would create socially cohesive communities of manageable sizes suitable for local people. In this way any necessary infrastructure developments can also be managed on a case by case basis. Sites are available, with building firms already interested to invest, in the south west and north of Stourport. Smaller developments in other areas, such as Bewdley, Churchill, Blakedown, Hartlebury, Chaddesley Corbett and Wolverley should also be given priority, instead of a huge swathe of development on the east side of Kidderminster and a potential new town of 1400 homes on the edge of Cookley.			
Blackford Neil	LPPS28	Local Plan Pre-Submission Publication	Yes	Yes	Yes		I support the Local Plan and consider it to be legally compliant and sound. It is a matter of profound disappointment that land is being taken out of the Green Belt. I support the Pre-Submission Local Plan because the proposed development on the two sites around Kidderminster enables the provision of essential social, first time and affordable housing to meet local need for the foreseeable future. Provision of supporting infrastructure, school, Doctors surgery and road/transport provision which these identified sites support well. It also retains Green Belt land in and around Kidderminster for the well being of local residents and in support of natural habitats for wildlife. Also retains agricultural provision and enhances Kidderminster's visual appearance and reputation for seeing all the right decisions are being taken with good sound reasoning.			
Garfield David	LPPS62	Local Plan Pre-Submission Publication	Yes	Yes	Yes		No comments.		No	

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Daley John	LPPS56	Local Plan Pre-Submission Publication	Yes	Yes	Yes		No comments.	None.	No	
Wolverley & Cookley Parish Council	LPPS205	Pre-Submission Publication					Wolverley and Cookley Parish Council voted in support of the Wyre Forest District Local Plan Review Pre-Submission Publication Consultation.		No	
Pochribniak Gillian	LPPS667	Whole Plan	Yes	Yes	Yes		I support the Local Plan and consider it to be legally compliant and sound. Whilst I regret that nay land is taken out of the Green Belt, I support the Pre Submission Local Plan because the concentration of development on two major sites around Kidderminster enable the provision of essential infrastructure, i.e. a school a doctor's surgery and transport services. It also means that the remaining good quality Green Belt land around Kidderminster is kept available for the essential protection of its wide ranging biodiversity as well as for agriculture, recreation and visual amenity.		No	
Davy Suzana	LPPS608	Whole Plan	Yes	Yes	Yes		No comment made.		No	
Price Laura	LPPS662	Whole Plan	Yes	Yes	Yes		I support the Local Plan and consider it to be legally complaint and sound. Whilst I regret that any land is taken out of the Green Belt, I support the Pre Submission Local Plan because the concentration of development on two major site around Kidderminster enable the provision of essential infrastructure, i.e. a school, a doctor's surgery and transport services. It also means that the remaining good quality Green Belt land around Kidderminster is kept available for the essential protection of its wide ranging biodiversity as well as for agriculture, recreation and visual amenity.		No	
Holt John	LPPS2	All	Yes	Yes	Yes		I support the local plan and consider it legally sound and compliant. I like and support the development of two major sites (garden villages) which enables essential infra structure such as schools, doctors' surgery on each site plus road/transport infra structure. I am clear that given previous consultations the plan complies with the duty to Co-operate. Well done.		No	
Price Laura	LPPS27	Pre-submission publication document	Yes	Yes	Yes		I support the Local Plan and consider it to be legally compliant and sound. Whilst I regret that any land is taken out of the Green Belt, I support the Pre-submission Local Plan because the concentration of development on two major sites around Kidderminster enables the provision of essential infrastructure, i.e. a school, a doctor's surgery and transport services. It also means that the remaining good			

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							quality Green Belt land around Kidderminster is kept available for the essential protection of its wide ranging biodiversity as well as for agriculture, recreation and visual amenity.			
Hill Gillian	LPPS14	Whole	No	No	No	Positively Prepared Justified Effective	Lea Castle: There appears to be little communication with other council areas that will be affected by the increased traffic flow i.e. Stourbridge & Dudley plus the Hagley route through to Birmingham. All roads are single carriage ways and have a large number of near misses, several accidents each and fatalities over recent years (A449 & A451). Your documents refer to the A456 adjacent to Axborough Lane - there is no A456 there. It states safe pedestrian and cycle access but no guarantee - try crossing the A449 from The Crescent to Cookley or anywhere along that stretch of A449. Plan states it should focus on previous developed area e.g. where the buildings stood (their footprint) NOT the surrounding arable fields (Green Belt). Where are the exceptional circumstances to build on Green Belt? There are no employment opportunities and the roads cannot take extra traffic without significant improvements and traffic calming measure such as islands. Plan shows a bridle way through - where is this exactly? There is a PRoW which must be maintained & enhanced for the local residents with a proper link to The Crescent. Has historical issues been properly researched. Musket balls have been found in the fields (English Civil War?) and the site has had previous small developments it seems. It contains acid grassland - why on earth would anyone want to relocate or recreate this elsewhere and destroy what is here so depriving the local population of a natural feature that is rightfully theirs. The Plan mentions the lesser horseshoe bat. NOTE: all bats are protected and the site contains a number of different types. Ask the bat people who are often on site overseeing the demolition and effect. Other protected species on site include dormice, badgers, grass snake (possibly adders) barn owls, treecreeper and thrushes. A dead young barn owl was found on the PRoW approx. 10 days ago, cause of death not obvious. Plan states new developments must have a 5inch hole in gravel boards/fencing to allow for wildlife movement - how on earth will this be enforced when householders will block them up?	Plan needs to be more detailed with options to prevent disruption to wildlife, particularly protected species. It needs to be accurate (where is the A456??) It needs to show proposals to make the road and transport links safe for both pedestrians and vehicles and suggest measures to do this. Dual carriage-ways and islands for example (please do not suggest speed cameras - they only work for the small amount of road they cover). Covenant on Lea Castle states build should take place only on the existing build footprint. How have the council got over this? State what exceptional circumstances there are to allow building on the green arable fields (Green Belt). Show dialogue with neighbouring authorities to demonstrate their agreement to such extra traffic and how they can deal with it.	Yes	To ensure clarity during the proceedings and that the concerns of local residents are not inadvertently overlooked.
Holt Caroline	LPPS55	All the local plan	Yes	Yes	Yes		I support the local plan and consider it to be legally compliant and sound. I wish to make the point that I find it abhorrent that any land has to be taken out of Green Belt at		No	

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							all whilst there are brown field sites and an empty town centre available. However, if it has to be the case, then I support the plan in as much as it concentrates development on two major sites, giving opportunity for provision of improved infrastructure - school, surgery, transport. Also hopefully then leaving remaining Green Belt around Kidderminster which currently gives recreational and health benefits, agricultural land and wide bio diversity. The plan includes details on improving the town centre, albeit reduced in area. However, in the current climate this will not be an easy task, and I implore that the council, planners and partners will be inventive in their approaches to businesses, and realistic in setting of rents and rates.			
Moreve Sue	LPPS34	all		Yes	Yes		I was pleased that consideration had been given to comments made in the previous consultation process in August 2017 prior to publishing this document. It seems that the plan will make good use of brownfield sites around the area especially in the Town Centre where due regard will be paid to the buildings already in place. In many cases the facade will be retained whilst the interior is refurbished. In the area of Kidderminster where I live there was strong concern that the Lea Castle site and the eastern proposals along Offmore would be extended into the SSSI area of Hurcott. This has been avoided it would seem and the Hurcott area left as a 'green corridor' with the additional proposal of closing one end of Hurcott Lane to prevent motorists using this as a 'rat run' between the two new housing developments. In addition to my support of the proposals I would also like to highlight 2 areas where, although there is mention in the plan, I feel that they are important for the future. The first is to have due regard to older people in the area and their housing needs with smaller developments of bungalows and other easy to maintain dwellings as well as town centre locations such as the Boucher Building which could be adapted for older residents who like the ease of access to shops and leisure activities that a development like this would bring. The second is to have as much new development completed by local builders as possible. This gives variety as well as employment and I would also press the Council to help self-builders more with publicity and access to prefabricated shells that are acceptable to local		No	

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							requirements. I know that everyone hates the development of housing on what was previously considered Green Belt land but I am aware of the need for additional housing across the country and I think that this proposal seeks to successfully balance both these issues.			
Millinchip Robert	LPPS61	Local Plan Pre-Submission Publication	Yes	Yes	Yes		No comments.		No	
Oborski Frances	LPPS74	32	Yes	No	Yes	Justified	Comments made in section participating in the oral part of the examination.		Yes	First of all I wish to state that, as Chair of the Local Plans Review Panel, I believe that there are three fundamental flaws in the entire Local Plan Pre Submission Draft as Published. 1. When introducing this Pre Submission Draft at the WFDC Cabinet Meeting, The Leader if the Council announced that it is :"The Conservative Administration's Local Plan". I have been involved in every Wyre Forest Local Plan and never before has a Plan been so blatantly Politicised. This is against the whole principle of politically neutral planning. 2. The Council now appears to admit that the Company it procured to deliver an A5, two sided, full colour, glossy leaflet to every property in the District, Advertising all the Drop In Consultation Sessions and informing residents where to find the Plan and how to comment on it, failed to deliver those leaflets to at least 50% of local residents. Since the vast majority of residents do not use Social Media and do not casually visit the local authority website I believe that we have

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										experienced a fundamental flaw in the Consultation Process which means that local residents have not been given a fair chance to comment when compared with the profession Planning Consultants working on behalf of major Development Companies. 3. I been informed that at least one of the LEPs to which WFDC belongs does not believe that it's Board Members have been correctly communicated with or given the opportunity to respond to this Pre Submission Draft. I believe that the Kidderminster Eastern extension, in so far as it relates to the 3/400 houses to the east of the existing Offmore estate fails to adequately protect the environment of existing residents, The fields in question are on rising land which is extremely visible, it is high quality, highly productive agricultural land which, by dint of the fact that it has an historic irrigation system installed by Lord Foley in the 19th Century means that it is productive even in periods of extreme drought. In order to protect the environment of existing residents of the Offmore estate it would be necessary to install a bund if at least 29metres if dense tree planting behind all existing properties to provide sound insulation, privacy screening and environmental protection. The proposed access off Husum Way immediately below the existing railway.bridge would be

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										totally unacceptable on highway safety grounds as it would be concealed from traffic coming from the Birmingham Rd direction and would be at a point where the existing road is actually on an embankment above the adjacent field. As far as we can see the only way to create an access would be via a roundabout aporoximately at the point of the existing Husum Way/Shakespeare Drive junction. The land around Offmore Residential Home and the Offmore Court barn conversions is home to bats, badgers, fixes and skylarks. It too would require a Tree bund of at least 29 metres. We believe that a spine road with a 20 mph limit is not actually achievable and will be used as an unofficial by pass. There are two ways of tackling this: either 1. Have the proposed traffic island proposed at the existing Birmingham Rd/Husum Way junction lead to a second railway bridge and actually create a by pass road from Birmingham Rd down to Comberton Rd with this road at the outer edge of the new development OR 2. If a full by pass road is not to be developed then instead of the proposed spine road being a through route make the bridge where it has to cross the Hoobrook single track pedestrian

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										and cycle only thus effectively creating two cul de sacs. If this bridge over the brook must be wide enough for vehicles then restrict its use to emergency and public transport vehicles only by the installation of rising bollards. We accept that creation of an adequate tree bund would restrict the number of houses in this part of the development to approximately 150 houses but believe that the extra homes then needed could easily be replaced on land adjacent to the Sion Hill School site or adjacent to the Marlpool estate at Wolverley Rd. We accept the development of approximately 1,000 houses at Stone Hill North BUT object to the idea of foot path or cycle way links from this development to the Comberton Estate via the existing Borrington Park. This park is locked at dusk to prevent antisocial behaviour and residents would not accept it being open for access as proposed.
Hagley Parish Council	LPPS212	The Whole Plan	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	The Plan fails to identify which policies are strategic so that a Neighbourhood Plan must conform to them and which are non-strategic from which a Neighbourhood Plan is entitled to depart. The Plan fails to set out clear housing targets for individual parishes, instead allocating specific sites. In doing so it is abrogating the principle of Neighbourhood Planning.	Every policy in the plan should be designated as to whether it is or not a strategic policy. Each parish should have a housing target.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Campaign to Protect Rural England	LPPS319	Local Plan Pre-Submission Publication	No	No		Effective Consistent with National Policy	Plans to be prepared. The Plan should be distinguishing between a small number of policies that are strategic and MUST be complied with by Neighbourhood Plans and non-strategic ones from which they may depart. The presence of over-prescriptive policies in a District Plan makes it difficult for a Neighbourhood Plan to do more than ape what the	Every policy should be designated either as Strategic or non-strategic.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.

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							District Plan says. As a matter of policy a NP should have the widest scope to develop innovative solutions to the problems of that Neighbourhood.			
Pochribniak Edward	LPPS668	Whole Plan	Yes	Yes	Yes		I support the Local Plan and consider it to be legally compliant and sound. Whilst I regret that nay land is taken out of the Green Belt, I support the Pre Submission Local Plan because the concentration of development on two major sites around Kidderminster enable the provision of essential infrastructure, i.e. a school a doctor's surgery and transport services. It also means that the remaining good quality Green Belt land around Kidderminster is kept available for the essential protection of its wide ranging biodiversity as well as for agriculture, recreation and visual amenity.		No	
Moseley-Downton Barrington	LPPS666	Whole Plan	Yes	Yes	Yes		Disappointed that any Green Belt is used but this version of plan offers least use of Green Belt.		No	
Blackford Neil	LPPS663	Whole Plan	Yes	Yes	Yes		I support the Local Plan and consider it to be legally compliant and sound. It is a matter of profound disappointment that land is being taken out of the Green Belt. I support the pre submission local plan because the proposed development on two sites around Kidderminster enables the provision of essential social, first-time and affordable housing to meet the local need for the foreseeable future. Provision of supporting infrastructure, school, doctors surgery and road/transport provision which these identified sites support well. It also retains Green Belt land in and around Kidderminster for the wellbeing of local residents and in support of natural habitats for wildlife. Also retains agricultural provision and enhances Kidderminster's visual appearance and reputation for seeing all the right decisions are being taken with good sound reasoning.		No	
Bewdley Say No to Gladman	LPPS184	6B,6E,11C,11E,16A,34	Yes	Yes	Yes		Submission by 'Bewdley Says No to Gladman' organisation BSNTG welcomes the opportunity to support the Pre-submission Publication (October 2018) of the Wyre Forest District Local Plan. It is sound, justified and consistent with the needs of the Wyre Forest District; as well as compliant with the National Planning Policy Framework (2018). Consequently, it is important to make the following points	None	No	

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							concerning the circumstances of Bewdley within the document. The Settlement Hierarchy Technical Paper (2018, pp10-11) makes a clear statement regarding the relative size of Bewdley. As it occupies a much smaller area than either Kidderminster and Stourport and has a population of less than 10% of the WF total, Bewdley "is considered to be less sustainable and less suitable for growth . . . ." This is further supported by its settlement pattern and topography. The River Severn floodplain, the narrow street patterns with associated difficult junctions and the relatively steep valley slope to the west, all contribute to showing severe development constraints for this market town. Therefore, policies 6B and 6E are fully supported. 1. The latest WF Housing Need Survey (2018) identifies a potential requirement of 21 dwellings per annum for Bewdley with a possible split of 10 to the east of the Severn and 11 to the west. As noted above, the physical restraints and lack of any remaining previously-developed land to the west means a requirement for the majority of dwellings to be allocated at locations to the east. Therefore, the sites shown in the section 34 policies are considered to be the most appropriate for future growth. 2. Bewdley is the location for one of the Air Quality Management Areas (AQMA) within WF. This area, Welch Gate, was designated as AQMA in 2003. It has proved to be an intractable problem due to the presence of 18th and 19th century building frontages only separated by a distance of between 6 to 8 metres. It is the only access to Bewdley Town Centre from the west, and traffic flows – now counted as an average of 15000 vehicles daily – result in peak time and some weekend queues which have consistently maintained levels of pollution at an illegal level. Therefore, policy 16A will safeguard this area from further deterioration due to inappropriate development. 3. Bewdley has a range of visually distinctive landscape settings which are of great interest and value to residents and visitors alike. This aspect of landscape value has recently been confirmed by the Appeal decision (reference APP/R1845/W/17/3173741) on land at the top of the western slope of the Severn valley as it changes from the rolling topology of			

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							older, more resistant rocks (Carboniferous in age) to the flatter landscape where softer rocks (Triassic) predominate to the south-east. This occurs due to the underground presence of a significant fault line which has effectively created this geological juxtaposition and deserved to be recognised as part of policy 11E. In addition, policy 11C concerning Landscape Character and Severn Valley Regional Heritage Park, is of significant relevance to the continued appreciation of Bewdley's highly valued and distinctive landscapes.			
Broadley Tracey	LPPS149	All the local plan	Yes	Yes	Yes		I support the Local Plan and consider it to be legally compliant and sound. Whilst I regret that any land is taken out of the Green Belt, I support the Pre-Submission Local Plan because the concentration of development on two major sites around Kidderminster enables the provision of essential infrastructure, i.e. a school, a doctor's surgery and transport services. It also means that the remaining good quality Green Belt land around Kidderminster is kept available for the essential protection of its wide ranging biodiversity, as well as for agriculture, recreation and visual amenity.		No	
Davy Derek	LPPS617	Whole Plan	Yes	Yes	Yes		No comment made.		No	
Stone Parish Council	LPPS874	The whole plan	Yes	Yes	Yes		Stone Parish District Council considered the latest version of the Local Plan review at its recent meeting and were supportive of the proposals.			
Laming Karen	LPPS675	Whole Plan	Yes	Yes	Yes		No comment submitted		No	
Gualano Marcello	LPPS690	Whole Plan	Yes	Yes	Yes		I believe that the local plan is sound and legally compliant and support the pre-submission plan.		No	
Moseley-Downton Julie	LPPS673	Whole Plan	Yes	Yes	Yes		Whilst I'm disappointed any Green Belt is developed on, I recognise that this option minimises that impact. If planning can force the development of all brownfield sites first. This will ensure that the next review doesn't have to add further Green Belt. I believe the pan recognised how narrow a corridor of Green Belt between SE Kidderminster and Stone and thus prevented merging of hamlet. Preservation f quality agricultural land is always welcome. If the plan is true to print then the new development should be well supported infrastructure wise. I would like exit onto Birmingham Road to be reviewed - separate to Husum Way.		No	
Walters Glyn	LPPS687	Whole Plan	Yes	Yes	Yes		I support the Local Plan and consider it to be legally		No	

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							compliant, sound and compliant with the duty to cooperate. Whilst I regret that any land is taken out of the Green Belt around Kidderminster, I support the pre-submission Local Plan because the concentration of development on 2 sites (to the greatest extent) enables the provision of essential infrastructure on these sites. It also means that the remaining good quality Green Belt land around Kidderminster can now be kept available for its biodiversity, its agriculture, recreation and visual amenity. This is particularly important related to the fields south of the Spennells estate down to Stanklyn Lane, which is regularly cropped and used extensively by a wide variety of bird and animal life (including barn buntings), as well as a local recreational facility by local people for walking, cycling, horse riding and photograph. I am also pleased that this Local Plan leaves the SSSI at Wilden Lane and its surrounding environment largely unaffected by further development. The settlement ponds site is an essential extension which needs to remain undeveloped next to the SSSI and ideally should be included within the SSSI boundaries.			
Sayles Rhian	LPPS696	Whole Plan	Yes	Yes	Yes		I support the Local Plan and consider it to be legally compliant and sound. Whilst I regret that any land is taken out of the Green Belt, I support the pre-submission Local Plan because the concentration of development on two major sites around Kidderminster enable the provision of essential infrastructure, i.e. a school, a doctor's surgery and transport services. It also means that the remaining good quality Green Belt land around Kidderminster is kept available for the essential protection of its wide ranging biodiversity as well as for agriculture, recreation and visual amenity.		No	
Spennells Against Further Expansion	LPPS845	Pre-Submission Document	Yes	Yes	Yes		(Petition signed by 234 people) We support the local plan and consider it to be totally compliant, sound and compliant with the duty to cooperate. Whilst we regret that any land is taken out of the Green Belt, we support the Pre-Submission Local Plan because the concentration of development on two major sites around Kidderminster enables the provision of essential infrastructure. i.e. a school, a doctors' surgery and transport services. It also means that the remaining good quality Green Belt land around Kidderminster is kept available for the essential protection of its wide ranging biodiversity as well as for agriculture, recreation and visual amenity.		No	

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Kidderminster Harriers Independent Supporters Trust	LPPS796	All of the Plan	Yes	Yes	Yes		KHIST is supportive of the Local Plan Pre-Submission Publication 2018, as published. This, we understand, has been referred at all stages to endure its legal compliance. We consider it to be sound, in that it identifies adequate land provision for housing and business developments, exceeding requirements determined by HM Government, whilst so far as possible, protecting the Green Belt. The loss of any Green Belt is entirely regrettable but the sites identified at Lea Castle and East of Kidderminster do justify their selection in preference to other areas. The cost of opening up these areas for development (taking into account restrictions of existing housing / industry and the line of the Birmingham-Worcester railway) is significantly less than for other options. By concentrating the bulk of proposed development in these two areas, the Council has been able to make provision for affordable road access, schools, doctors' surgeries, local amenities and green spaces. In particular, the comparatively cheap cost of road access has been a major consideration. This proposed concentration of development also protects other sensitive Green Belt areas in the Wyre Forest, which will now remain as prime agricultural land, natural habitat, space for recreational and health activities and open countryside. The plan, as now published, has been considered by the KHIST board and we are satisfied that it represents the views of all the members attending our recent AGM, in that there will now be no continuing threat to the traditional home of Kidderminster Harriers Football Club, at the Aggborough Stadium. It also avoids a need for potential development of the most sensitive, remaining areas of Green Belt in Wyre Forest District.			
Spennells Against Further Expansion	LPPS823	Pre-submission Document				Positively Prepared Justified Effective Consistent with National Policy	I give support to the Spennells Against Further Expansion in the Consultation on the Wyre Forest District Local Plan (1st November – 17th December). Whilst it is with regret that any land is taken out of the Green Belt I support the Pre- submission Local Plan because the concentration of development on the two major sites around Kidderminster enables the provision of essential infrastructure, i.e. a school, a doctor's surgery and transport services. It also means that the remaining good quality Green Belt land around Kidderminster is kept available for the essential protection of its wide ranging biodiversity as well as a for agriculture, recreation and visual amenity.		No	

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Lofthouse Pamela	LPPS694	Whole Plan	Yes	Yes	Yes		Support the Local Plan and consider it be legally compliant and sound. Whilst I regret that nay land is taken out of the Green Belt, I support the pre-submission Local Plan because the concentration of development on two major sites around Kidderminster enable the provision of essential infrastructure, i.e. a school, a doctor's surgery and transport services. It also means that the remaining good quality Green Belt land around Kidderminster is keep available for the essential protection of its wide ranging biodiversity as well as for agriculture, recreation and visual amenity.		No	
Garfield David	LPPS665	Whole Plan	Yes	Yes	Yes		No comments submitted.		No	
Rock Parish Council	LPPS176	ALL					Further to your letter of 1st November 2018 my council have had the opportunity to study the consultation in great detail and have RESOLVED to support the proposals generally with the following caveat and objection; Rock Parish Council endorsed the proposed changes to the Settlement Boundaries for Far Forest, Bliss Gate, Rock, Callow Hill and Clows Top. The Council supported the Policy 36.2 relating to Alton Nurseries at Long Bank (BR/RO/210) having previously supported planning approval for 4 dwellings under planning application No 18/0413/Full. The Council firmly believes the remainder of the site should be used for Employment Use only. Council considered Policy 36.1 at Lem Hill Nurseries (BR/RO/2) this site has never previously been considered publicly and the Parish Council RESOLVED to totally oppose this site moving forward in the process. The Lem Hill Nursery Site has always been known as Bill White Nurseries. It is completely outside the Wyre Forest District Council Settlement Boundary and has poor access off the busy A4117. The Land suffers from surface water flooding in bad weather. A Previously proposed development along New Road has been dropped due to local unrest and objections referred to in this round of consultations. The Local Primary School is over subscribed and the site is landlocked for any possibility of future expansion. Development on this site would put severe pressure on the Education Authorities in finding placements in Schools			

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							outside of the Parish Boundary. The Far Forest does not have good local amenities for a Village of its size and adding up to 20 dwellings would add severe pressure on the already over stretched Doctors Surgery and Dentists practices. Finally the Parish Council believes there has been no locally identified need for this proposal and its does not comply with the Parish Plan or Housing Needs Survey. Rock Parish Council unanimously opposed this site being carried forward.			
Strevens Sheena	LPPS76	Whole document					Concerned that relevant documentation in relation to this consultation process was not delivered to the majority of homes in the town. Therefore a large number of people have been unable to take part. The town does not require more homes, there are hundreds for sale and standing vacant within the district. We should be preserving fields and the Green Belt not destroying them for the selfish gains!			
Mcgovern Iain	LPPS239	The whole Plan		No	No	Effective	I object to all plans because of the reasons below. • Increased volume of traffic • Increased pollution • Damaging to the wildlife • Not for the benefit of the local community	• Reduce the number houses to be built in each area • Review the locations of the plans to make it more even across the county	No	
Persimmon Homes Limited	LPPS822	Whole Plan	Yes	No	Yes	Justified Effective	Where there are several policies within a section of the Plan they are typically subdivided by a letter suffixed to the policy number, for example; Policy 8A through to Policy 8G. Later in the plan this is replaced by a numerical suffix, for example Policy 30.1 through to Policy 30.29. There is scope for a degree of confusion as the plan also contains Paragraphs 30.1 through to 30.29 (and beyond) and the paragraphs do not align with the policies of the same number. Whilst this may seem like a minor point it does add an element of confusion to cross referencing the plan, and it would be beneficial if the Policy referencing system was consistent throughout the plan.		Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination.
Walters Linda	LPPS674	Whole Plan	Yes	Yes	Yes		I support this Local Plan (October 2018 version) because it concentrates the (alleged) housing need on two sites, thus allowing the essential provision of the necessary infrastructure. Whilst regretting that any land is taken out of Green Belt before all the brownfield sites are developed, this plan allows other Green Belt sites in the district to remain untouched.		No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO: WHOLE DOCUMENT

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Gualano Carrie-Ann	LPPS691	Whole Plan	Yes	Yes	Yes		I support the local plan and its legal compliance although I do feel it is a shame that any Green Belt land is used before any brownfield site.		No	
Hine Doug	LPPS689	Whole Plan	Yes	Yes	Yes		I consider the Local Plan compliant and sound. However, I have a number of comments. The area areas known as “Captains and the Lodge” and the fields adjacent to Spennells Estate, extending to Stanklyn Lane and between the A449 (Worcester Road) and A448 (Comberton Road) were included as possible sites for housing development in the Preferred Options Consultation of 2017. I am pleased to find that they are not in the Local Plan Pre Submission Publication of October 2018. I remain concerned that there will be “push back” from other parties to this consultation to increase the housing target in the Plan with the result that the abovementioned areas are added back in. A large variety of reasons why these areas are unsuitable for development were supplied in consultation of 2017. Key reasons include: 1) the expense of building a road over or under the railway on the south-west side of a possible new estate; 2) a number of rare and threatened species in the area; 3) loss of good quality agricultural land; and 4) the effect on drainage, flood management and water quality in downstream nature reserves. Regarding other areas, it is regrettable that any Green Belt and green field areas are proposed for development, although I appreciate that WFDC has to conform to Government dictate and plan to deliver this 6,300 homes by 2036. WFDC could somewhat reduce the need to use Green Belt and green field sites by having a more aggressive and joined up approach to acquisition of vacant and derelict sites, funding the conversion of them for accommodation and turning them over to be run by community housing associations. Instead, there are a number of projects where Council money is being spent in support of expansion of retail and commercial sites. The reopening of Worcester Street for traffic is a multi-million pound folly to encourage retail expansion when the demand for on-street retail is falling and the focus for shopping in Kidderminster has moved. Another mistake is with the former “Glades” site! “Lion Fields” development, where a multiplex cinema and cafes/restaurants are planned with doubtful viability, and the site would be better off primarily as apartments.		No	

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							Adjacent to Easter Park, along Worcester Road (FPH/27), is not justified as there appears to be sufficient sites for employment in the District and I do not see how "an attractive entrance to the town" (p.228) can be achieved simply by having "green roofs". It is also regrettable that the "affordable homes" requirement is being reduced from 30% to 25%, when there is a wide disparity in incomes and a significant number of people on low incomes stuck in sub-standard housing or on housing waiting lists. Because Government policy supports private building companies, housing construction is at the mercy of private building companies who are interested in making the biggest profits. The result is that the number of affordable homes built in Wyre Forest becomes a negotiation between the Council and developers. I appreciate that if a new estate is unavoidable, then it is preferable that it number at least 1000 homes in order to release funds for a new school and has provision for significant green space, and local shops and services. This is in the plan for the new estates at Lea Castle and adjacent to Offmore & Comberton. I am concerned with the proposed site at Yew Tree Walk, Stourport, which is currently Green Belt. It supports a variety of wildlife and, although I am not a soil engineer, I do not see how homes can be built on an ash deposit. I welcome an extension of mainline train services on the Severn Valley Line, with possible stops at Sliverwoods/Foley Park, the Safari Park and Bewdley. I also welcome a car park at Bewdley Rail Station. Other than this, however, the transport policy is weak and does not address the demand for increased journeys that the planned increased population will make. The obvious solution is a comprehensive bus service but this is out of council hands because of Government laws which ban local governments from operating or significantly subsidising public transport.			
Moseley-Downton Charlie	LPPS672	Whole Plan	Yes	Yes	Yes		Although I am disappointed to see Green Belt land still included I support this version of the Local Plan and consider it to be legally compliant and sound. I will support any plan that maximises Green Belt preservation.		No	
Lofthouse David	LPPS721	Whole Plan	Yes	Yes	Yes		I support the PreSubmission Local Plan as full consideration appears to have been taken for the provision of essential infrastructure, i.e. schools, doctor's surgery and transport services. Planning guidelines say that the Green Belt status should be retained except in 'exceptional circumstances' and		No	

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							I assume the plan takes this into consideration. However, it of utmost importance that no further plans are developed to build on any other Green Belt areas around Kidderminster. Failure to meet these guidelines would result in loss of productive agricultural land and remove the facility of use for recreational purposes which could affect the wellbeing and health of local residents.			
Davies Maria	LPPS878	The whole Plan	No	No	No		I believe many aspects of the plans are not legally compliant. Some land on Green Belt sites were sold by the council to property developers without proper consultation i.e. Hurcott. This needs to be reviewed in order to maintain this site from future development. Once again the withdrawal of our Green Belt from being just that is not sound or justified. While these areas that should and must be protected in order to balance the already polluted areas where already too much traffic flows through. Causing at many times, grid lock.	Overall, there is nothing to signify areas of economic growth. All outer rim Green Belt will become commuter homes for Birmingham and therefore will not add anything to our town. Any new build particularly on Green Belt will further impact on not only our quality of air, but the consequences of carbons from fuel will be detrimental to wildlife and plant life alike. For all land that is left or managed correctly will ultimately benefit us all and provide sustainability to our environment and planet globally. Without this, not backward thinking as some would argue, but more forward evidence the retaining of Green Belt is now paramount and crucial. As a long standing volunteer to the ranger service I have witnessed the benefits of retaining land. The conserving of this land is crucial, without it the future is perilous in terms of habitat loss, climate and flooding.	No	I cannot partake as part of any organisation so I feel my participation in any oral examination will not be heard in quite the same way. I can only offer my vision as I see it currently and in the near future, and the impact more number will mean to our environment.
Marmaris Investments Ltd.	LPPS837	Whole plan	No	No	Yes	Positively Prepared Justified Effective	The plan as a whole is not positively prepared and contains many negative or prohibitively worded policies. The wording should be reviewed to support development, except in certain circumstances.		Yes	Green Belt / Transportation / Housing issues are important areas of the plan and inclusion in the debate at the examination

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						Consistent with National Policy	The Green Belt review, dated April 2017, is referred to in the document, but its findings as a whole are not carried forward into the draft plan. The plan is selective and seeks to use the findings of the Green Belt study only around the main towns, with no reference or actions proposed in settlements such as Blakedown where the study, at pages 99-100, finds the site the subject of these representations can be released from the Green Belt with no harm to its purposes. As such the plan should be reviewed to follow the findings of the Green Belt study so that Green Belt boundaries can endure well beyond the plan period. Growth in the district within the plan period is focused on the main towns with little proposed in smaller sustainable settlements such as Blakedown. The strategy of the plan should be positive and to provide for growth, commensurate with the needs and function of all the settlements, in all areas of the district. The plan is clear there is a significant unmet housing need for both market and affordable dwellings but does not set out to meet these in total. This should be re-addressed and sites found to accommodate the full future housing needs. The starting point appears to be the identified sites and a reverse calculation from that point. This is not positive planning and will result in unmet housing need and a shortage of affordable housing in particular. The demographic assessments behind the calculation of OAN should be reviewed as these under estimate the need across the district and fail to make adequate provision as a result. The needs of specific groups such as the elderly and those in need of affordable housing will not be addressed in the current housing strategy as proposed. For instance, the plan states at paragraph 8.15 refers to the "significant affordability issues relating to house purchase in all of the Parishes……this is most marked within the rural parishes of ……..Churchill and Blakedown….." yet the plan makes no provision to address this need. The plan proposes a vision in 2036 that refers to the villages such as Blakedown continuing to provide key local services, but with no positive planning to ensure such services can endure for the lifetime of the plan. Without selective and reasonable growth, villages such as Blakedown will suffer from stagnant population and falling numbers of younger, family orientated households, as the current population ages. Recent development demonstrates that modest local growth can be assimilated into the villages of the district, and this needs to be catered for in the draft plan.			will be useful to the Inspector

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO: WHOLE DOCUMENT

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Laming Paul	LPPS677	Whole Plan	Yes	Yes	Yes		No comments submitted.		No	
Nash Barbara	LPPS695	Whole Plan	Yes	Yes	Yes		I support the Local Plan and consider it to be legally compliant and sound. Whist I regret that any land is taken out of the Green Belt I support the pre-submission Local Plan because the concentration of development on two major sites around Kidderminster enable the provision of essential infrastructure, i.e. a school, a doctor's surgery and transport services. It also means that the remaining good quality Green Belt land around Kidderminster is kept available for the essential protection of its wide ranging biodiversity as well as for agriculture, recreation and visual amenity.		No	
Dewar William	LPPS857	Whole Document		Yes			I broadly feel the plan to be sound as in a number of respects it is broadly consistent with some [though not all] of the planning points/ principles I identified in response to a previous local planning consultation process back in 2017. For the record I am restating the following points/principles which I made then and which I feel still remain relevant. They are reflected to some degree [but not entirely] in the latest plan. In my view Planning decisions / options should be informed by the following principles [a number of which I recognise are implicit if not explicit in the latest documentation. • The individuality/personality of Kidderminster/Bewdley/Stourport and adjacent settlements must be sustained and protected. • The existing and in some cases already diminishing / threatened / remaining open green space between these town [e.g. as a result of the - in my view, mistaken permission given to the Safari Park to build a hotel/complex on Green Belt land between Bewdley /Kidderminster] Must therefore be protected. • No greenfield sites should be considered/ built on when brownfield/derelict sites are still available [e.g. Power station land adjacent to Tescos in Stourport, Timber yard by Canal in Kidderminster, disintegrating workhouse site, part of Load Lane car park site in Bewdley etc. • Empty Underused retail spaces in centre of towns should be converted into housing. • The capacity of Kidderminster to support additional housing population e.g. in relation to availability of	A. The need for building on identified green field sites in Bewdley could be somewhat reduced by amongst other things: • Conversion of workhouse in High Street and derelict underused neighbouring land near the R.C. church into flats [naturally in keeping with historic surroundings]. • Imaginative use of the Fire station dog lane site for housing in keeping with existing Dog Lane Historic cottages. It is a pity that more imaginative uses of more extensive the former medical centre/ library site to build some small business premises flats again in keeping with historic settings could not have been included in the plan - a real opportunity	No	

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							brownfield sites/ proximity to often underused and therefore vulnerable retail capacity and main line rail links is greater than that of the other two towns. Keeping additional housing close to existing transport and underused retail capacity would also reduce pollution / traffic congestion across the Wyre Forest District. The following points should also be specifically noted in relation to Bewdley/ Stourport. • Since the war and in particular in the 1960s 70s 80s Bewdley has greatly expanded and accommodated a lot of additional and substantial housing development on Greenfield Land totally altering the size character and layout of the town and increasing pressures on local services / transport provision etc. • Same applies to Stourport/ Areley Kings • It is good that any idea of further extensive greenfield building sites west of the river at Bewdley appears to have been rejected in this latest plan. The recent Gladman case emphasized the negative impact of such development on transport congestion pollution. • Bewdley despite its massive expansion still has a lot to offer as a tourist destination being a historic town with many attractions. If even some of the proposed greenfield development took place the impact on the town would be such that what it has currently to offer the broader district as an attractive tourist destination could be lost. Don't spoil it. • It is good that there is some recognition of the need to landscape those green field sites that have been identified in Bewdley east of the river at Stourport Road, Catchems end etc. to minimise negative impact on important green gap between Bewdley and Stourport/ Kidderminster. • Hopefully the same will apply in relation to sites identified west of Stourport at Areley Kings to minimise impact on green gap between A.K. and Astley and Dunley.	missed to possibly form an iconic square opposite the St Georges Hall etc. • Imaginative wholescale redevelopment of Bridge house surrounding Rowing Club site in Wribbenhall and adjoining camping site to maintain some business / sport related capacity but also to create significant additional housing - hopefully mor ein keeping with and enhancing older existing housing along this part of the river. • Renovation of empty retail properties into flats [e.g. former HSBC site. In addition I have real additional fears that plan as it stands. • Presents the dangerous significant prospect of narrowing the essential gap between the west midlands conurbation and this part of Worcestershire with its unique history and traditions. The proposed eastward northward		

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								expansion of Kidderminster should not be a prelude to or excuse for further worrying expansion in these directions and towards the W.M Conurbation. • Reduces and therefore if care is not taken potentially jeopardises the preservation of the gap between the 3 towns of Kidderminster/ stourport Bewdley and consequently their individuality. • Needs to take account of the fact that the gap between Bewdley and Kidderminster has already been jeopardised by the decision to allow significant hotel/facilities expansion in the Safari park with consequent traffic congestion / pollution which of course would be intensified if the additional development indicated along the road/ by pass at Catchems end were to be too intensive and intrusive.		

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO: FOREWORD AND APPENDICES

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Quiney Roger	LPPS168	Foreword		No		Justified Consistent with National Policy	Please see the document attached that has my opinions and comments regarding compliance with the NPPF (2018). I feel I must also make the following comment in addition to the content of file attached below. Retaining the original timescales for consultation and responses, considering the SIGNIFICANT changes made, is inconsiderate and appears to play for a grossly unfair Council advantage. The deadline should have been delayed to allow proper consideration by those affected. Not doing so is un professional and feels as though it is an attempt to get The Local Plan accepted without a due process. I read a response from the Leader of the Council regarding a request that was made for a delay to the deadline is made so as to take account of the late changes made. His simply saying that it is not possible to allow a delay, suggesting the necessary protocols have been met and having to accept this without being able to check against the appropriate policies in place, is not acceptable. The non –distribution of the amended plan, A5 notifying sheets (fault to be determined), with the assumption that everybody reads local press and Dr's waiting room boards and a perception that he gave no real gravitas to the official information circulars, adds to the angst that the above gives. I initially found out about the SIGNIFICANT changes in the proposal, purely by chance on Facebook, by a concerned group NOT connected to WFDC.		No	
Pickett David and Mrs Marjorie	LPPS899	Appendix B Maps		No		Justified Consistent with National Policy	The objections are centred around Policy 36 'Villages and Rural Areas Site Allocations' and the re-drawing of the defined settlement boundary for Far Forest. Policy 36.1 'Lem Hill Nurseries' (BR/RO/2) seeks to allocate 20 residential units in Far Forest off the A4117. The reason for this allocation is outlined in the reasoned justification as *'Far Forest is a well-served village with a primary school, shop, public house and churches'*. There is no objection in principle to this allocation. However, this allocation forms an integral component to our strong objections to the Council's decision to re-draw the settlement boundary to accommodate further infill residential development in the village. It is important to consider that as part of the Local Plan Review Preferred Options (2017), an allocation for residential development on land adjacent Tolland (Ref. BR/RO/4/6) was ruled out by the Council. The Officers comments for this were outlined as: *"The decision has been taken not to allocate these sites through this Local Plan. Further ecological assessment has been undertaken and the final report is awaited.*	In order for the Local Plan to be made sound, the Council should revert the settlement boundary for Far Forest as per the previous Development Plan Core Strategy (2010). As outlined in question 6, there is no justified evidence to re-draw the settlement boundary and any such revision would not be in accordance with National planning policy.	No.	

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							If when the housing needs survey for Rock Parish is updated a requirement is found that cannot be accommodated elsewhere, these sites may need to be reconsidered. Only very limited development would be allowed with the potential to develop the orchard further for the benefit of the wider community". A Preliminary Ecological Appraisal was subsequently carried out on this site on 5 October 2018. A copy of which can be found by the following link http://www.wyreforestdc.gov.uk/media/3991996/ADDENDUM-2-to-Ecology-Appraisal-of- WFDC-sites-for-allocation.pdf. The site was identified as a potential area for ecological value due to its proximity to Wyre Forest SSSI and possible species-rich grassland. The conclusions of this appraisal stated that: *"The presence and positions of ancient fruit trees and tree lines on two boundaries restricts developable area and layout. Due to the nature and configuration of the ecological constraints we caution that WFDC consider removing this site from allocation in its entirety".* The appraisal identified the following: *Features of biodiversity significance* • *Cherry trees showing some features of ancient trees (e.g. hollowing trunk, cavities and very rough and creviced bark), with a high likelihood of supporting the noble chafer beetle and potential to host roosting bats.* • *Mature trees on the southern (road-side) and eastern boundaries are important corridors at a landscape level.* *Recommendations* • *The ancient fruit trees must be retained (NPPF 18 paragraph 175c: development resulting in the loss or deterioration of irreplaceable habitats [such as ancient woodland and ancient or veteran trees] should be refused, unless there are wholly exceptional reasons…). The locations of the trees would make it very difficult to develop this site without removing or at least causing their deterioration.* It is therefore clear why this site was removed as an allocation, as there are significant constraints, which could impact negatively upon any planning application for new residential development. Notwithstanding this, the Council has sought to re-draw the defined settlement boundary in Far Forest to include the land advanced as a residential allocation. This would allow an infill development of up to 6 units in line with paragraph 36.18 of	If you have any questions, please do not hesitate to contact me.		

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							Policy 36. The Council's justification for re-drawing the settlement boundary in Far Forest is outlined in paragraph 36.18, which states that *"Development on Non-allocated plots in villages outside the Green Belt…To the west of the River Severn in villages and settlements outside the Green Belt, there is the potential to bring forward small infill plots for up to 6 dwellings. These plots can come forward under Policy 18B. Amendments have been made to settlement boundaries in a number of villages in Rock Parish to enable small sites to be brought forward for development. This will allow for limited development to help retain village services. Revised settlement boundaries are shown on the Policies Map. Any development will need to be carefully designed to reflect the characteristics of the settlement and take account of any existing constraints such as flooding, drainage, ecology and landscape".* The settlement boundary has been extended significantly to include land to the north, where vehicular access can only be provided off Plough Lane. The justification for re-drawing the settlement boundary in Far Forest is to allow new infill residential development for up to 6 residential units. By re-drawing the settlement boundary, the Council are effectively promoting the former de-allocated site for new residential development, which would likely cause significant harm to the important ecological features on the site. This would go against national planning policy as contained within the updated Framework (paras 174-175). There are also significant concerns over the justification to re-draw the settlement boundary in Far Forest in terms of the evidence base used by the Council. As part of the Local Plan Review, the Council produced a 'Settlement Hierarchy Technical Paper' (October 2018). The aim of the paper is to *"set out the background to the settlements within the District and provides a recommendation as to a suitable settlement hierarchy for use in the District's Local Plan. The paper reviews the services and facilities which are currently available within the settlements across the District. The evidence presented here demonstrates that the Settlement Hierarchy is the most suitable for accommodating the growth for the District…"*. The paper makes reference to Far Forest stating that *"This settlement is also located to the west of the District. Far Forest contains a number of facilities. The settlement has a convenience store including a Post Office, a Primary School, a Public House and a Village Hall. These facilities all provide important roles within the settlement and ensure that there remains an element of self- sufficiency. However, the settlement still relies on higher-order centres for a large number of services and facilities. Given the location and accessibility of the area it is not considered to be a suitable location to prioritise new development, aside from potentially catering for any identified local need" . (My emphasis)* The last sentence in the paper clearly outlines that there is no justifiable evidence to prioritise new residential development in this area. Notwithstanding this, an			

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							allocation of 20 units has been identified by the Council along with a new revised settlement boundary, which could accommodate up to a further 12 units on two infill sites (e.g. Orchard House and Plough Lane). This could amount to a total of at least 32 new dwellings in a location that is not considered to have good accessibility to higher order centres. This goes against the evidence contained in this paper. At the very least, if the allocation at 'Lem Hill Nurseries' is considered sound; then there is no evidence to suggest that the settlement boundary for Far Forest requires amending to accommodate further sites for residential development. There is no evidence to justify why further residential development is required in this village. Looking at the Individual Settlement Analysis (Appendix A) of the paper, it is clear that Far Forest is in the bottom 4 (out of 15) locations in the District in terms accessibility to services such as a Post Office; G.P; Public House; Dentists; Convenience Store; Bus services frequency and destination; Primary School; Secondary School; Public Hall; Employment Opportunities and Railway Station. One of the villages identified as being similar to Far Forest (i.e. Clows Top) in terms of accessibility does not include any revisions to their settlement boundaries to accommodate further infill development. This village is also not subject to any allocations for new residential development. It should therefore follow that in order to help retain the village facilities (as promoted by the Council in para 36.18) of Clows Top, then small infill residential developments would be appropriate in this locations rather than a village, which already has an allocation for 20 residential units. The Council's strategy for amending the settlement boundary of Far Forest is not justified on proportionate evidence. This is especially the case when there are reasonable alternatives (i.e. Clows Top), where new infill residential development would be more appropriate in terms of their accessibility to higher order centres and retaining their village facilities. It is also our contention that the amendments to the settlement boundary of Far Forest will result in potential windfall sites, which will fail to accord with local and national policy guidance. As highlighted above, the land adjacent of Tolland is identified as of high ecological value. Therefore, any proposal for infill residential development is likely to result in significant harm. By including both land adjacent to Tolland and Orchard House, it is clear that there will be only one access point into these parcels of land off Plough Lane. Any infill scheme for both parcels could result in the provision of 12 new properties. Plough Lane is a minor rural road and designated public right of way. Any intensification of traffic movements along this narrow track will likely cause significant harm to			

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							highway and pedestrian safety. The key constraints of Plough Lane are as follows: • It is a Public Footpath (Worcestershire path number RK-541 {label 541B} • Has no legal right of use for motorized vehicles (Section 34[1] of the Road Traffic Act 1988) except for long term established use by its 13 properties. • Is single track being 2.8 metres wide. • Has a (mostly) rough broken metalled surface. • Has a dangerous exit onto A4117. • Is directly opposite a busy public house car park. • Is adjacent to a busy shop car park. • Is directly opposite the bus stop. • Is not wide enough to allow 2 vehicles to enter/leave at the same time. • Has poor visibility to the right because of bollards and parked vehicles (including HGVs) outside Forest Stores. • Has poor visibility to the left due to the rise in the A4117 from the junction with New infill residential development for up to 12 new properties will fail to accord with paragraph 108 of the updated Framework which seeks to ensure that development results in a safe and suitable access to a site, which can be achieved for all users. <u>Conclusion to Question 6:</u> The National Planning Policy Framework (NPPF) (para 35) states that to be sound a local plan must be: *- Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;* *- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;* *- Effective – deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and* *- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.* It is our contention that the Council's updated Local Plan cannot be found sound. The re-drawing of the settlement boundary in Far Forest has not been justified through an appropriate strategy taking into account reasonable alternatives or proportionate evidence. The above representations make this very clear. This therefore leads to a Local Plan, which fails to accord with the national policy and			

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							will not deliver sustainable development as defined by the updated Framework. I would therefore respectfully request that the Inspector finds the updated Local Plan unsound.			
Limbrey Susan	LPPS893	Appendix B Maps		No		Justified Consistent with National Policy	Under **Worcestershire CC Landscape Classification**, Far Forest lies at the heart of the Forest Smallholdings and Dwellings category. Many of the orchards characteristic of this area have already been lost, making those remaining, and corridors linking them, especially valuable for the protection of their flora and fauna, including many locally and nationally threatened species. **Worcestershire Biodiversity Action Plan** recognizes these orchards as habitats of principal importance.	Re-drawing of Far Forest village boundary to exclude Land Adjacent to Tolland Bungalow.	No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 1: INTRODUCTION AND CONTEXT

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Bareford David	LPPS113	1.5	Yes	No	No	Positively Prepared	This latest pre-submission consultation is dramatically different to the preferred options consultation in that there are far more housing schemes (Lea Castle housing up from 600 to 1400 and housing at Caunsall not mentioned in the 2017 document) without making it clear to the public that these have been added. This does not allow effective consultation and response.	The local plan should be very similar to the 2017 document with minor modifications based on the response and not additions in opposition to any comments.		I would like to be sure I am heard as comments from the 2017 document seemed to have been ignored.
Bareford David	LPPS115	1.7	Yes	No	Yes	Justified	The NPPF should be challenged as a means of estimating housing needs. Though we do need more housing, a similar estimation of golf course provision some years back led to a rapid expansion of those facilities and since then a marked contracture due to a gross over-estimation.		No	
Nicholls Kay	LPPS10	1.12	No	No	No	Consistent with National Policy	NPPF states Local Plans need to meet 'the objectively assessed needs for the market and affordable housing in the housing market area'. Based on the Lea Castle site and the current outline consent, the amount of affordable housing is lower than would be expected. Furthermore, the site includes areas of low density housing. Should this pattern continue for the wider development aspirations, then the needs of local people will not be met. This would instead likely meet a demand from outside of the Wyre Forest area and not the area the plan is supposed to serve. Housing needs surveys have been undertaken showing that opportunities for affordable properties for downsizing as well as for those with growing families are sought.	Rather than building a development within the green belt of executive homes, opportunities should be explored within the existing urban area. It is likely that homes built in the urban area would meet the needs of locals better both in terms of affordability and access to services. An appropriate level of affordable housing should be stipulated for development that does go ahead on the Lea Castle site.	No	
Barberry Hurcott Limited	LPPS925	Duty to Cooperate	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Disagree with paragraph 6.11. Do not agree that WFDC is a self-contained Housing Market Area. It is clear that the District shares a housing market area with the periphery of the Black Country in particular. Are aware of neighbouring authorities who have commented about the role of WFDC to meet the potential unmet need of Greater Birmingham and Black Country Housing Market Area. Conclude that the plan has not been positively prepared.		Yes	Due to the complexities of the issues of concern to the promoter, and the nature and the extent of public involvement in this site, it is considered that further verbal clarification and discussion at the EiP Hearings will be essential, and will further assist the inspector.
Home Builders	LPPS919	1.15		No	No	Positively	To fully meet the legal requirements of the Duty to Co-operate	To fully meet the legal requirements of the Duty	Yes	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 1: INTRODUCTION AND CONTEXT

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Federation (HBF)		Paragraph, Duty to Co-operate				Prepared Justified Effective Consistent with National Policy	Wyre Forest District Council should engage on a constructive, active and on-going basis with its neighbouring authorities to maximise the effectiveness of plan making. At the time of this pre-submission document no Statement of Common Ground was available.	to Co-operate Wyre Forest District Council should engage on a constructive, active and on-going basis with its neighbouring authorities to maximise the effectiveness of plan making. At the time of this pre-submission document no Statement of Common Ground was available.		
Worcestershire County Council, Planning Economy & Performance	LPPS975	1.15					**Duty to Co-operate** The WFDC pre-submission plan is not currently supported by Duty to Co-operate agreements or a Statement of Common Ground. However, we understand that WFDC propose to produce these to support the submission of the plan. We will work jointly with WFDC on the Duty to Co-operate statement with WCC, and to address the issues outlined below prior to submission of the plan.			
Association of Black Country Authorities	LPPS189	Para 1.18 (and other parts of the Plan)	No	No	No	Positively Prepared Effective Consistent with National Policy	The Black Country authorities responded to the Preferred Options Consultation and, as part of this response, expressed the need to agree a Duty to Cooperate Statement I Memorandum of Understanding between the relevant local authorities. However, this has not been progressed. Therefore, the Black Country authorities now wish to submit a formal holding objection to the Plan until issues relating to the Duty to Cooperate are resolved. In particular, the Plan makes no commitment to contribute towards meeting the evidenced unmet housing and employment needs of neighbouring authorities, including the Black Country authorities. This is disappointing and does not address the representations made by the Black Country local authorities to previous consultations. The Black Country authorities request that the Plan should make provision to help meet the unmet housing and employment needs of the Black Country, either in the form of the identification of additional sites or through a firm commitment to an early review of the Plan. Local Plans are required to meet the tests of soundness as required by paragraph 35 of the National Planning Policy Framework (NPPF) which means that they are positively prepared, justified, effective and consistent with national policy. The tests of soundness which are of concern are as follows: Positively prepared: the plan should be prepared based on a		Yes	The Black Country Authorities would wish to explain to the Inspector the current position regarding unmet housing need.

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							strategy which seeks to meet objec.1:ively assessed development and infrastructure requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development; Effective: the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities. Paragraph 1.16 of the Plan acknowledges the Council's duty to meet the new tests of soundness and to comply with the Duty to Cooperate. Policy 6A (B) states "As required by the Duty to Cooperate, due consideration will be given, through future review of the WFDC Local Plan where appropriate, to the housing needs of neighbouring local authorities in circumstances when it has been clearly established through the local plan process that these needs must be met through provision in the Wyre Forest District Area." Although the Plan acknowledges the importance of meeting the unmet housing needs of neighbouring authorities, we do not consider that the pre-submission Plan goes far enough to fully address this issue and therefore request that specific amendments are made to the pre-submission Plan to ensure that it is sound. In light of the evidenced unmet housing needs in the neighbouring Greater Birmingham and Black Country Housing Market Area, the Black Country authorities would expect Wyre Forest to allocate specific sites to help meet this need or to make a firm commitment to an early review of the Local Plan which could help meet this need, with specific timescales. Failure to do so would be contrary to the requirements of the tests of soundness. In summary, the Black Country authorities do not consider that the Plan adequately addresses the Duty to Cooperate and the tests of soundness set out in the National Planning Policy Framework. The commitment to continuously consult and engage with adjoining authorities does not sufficiently deal with Duty to Cooperate issues. In particular, in order for the Plan to be sound, there must be an inbuilt flexibility in the Wyre Forest housing supply up to 2036 to help meet the unmet housing needs of neighbouring and nearby authorities. The Black Country authorities would welcome the opportunity			

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							to discuss this matter further with Wyre Forest District Council with a view to preparing and agreeing a Duty to Cooperate Statement I Memorandum of Understanding between the relevant local authorities. See attached supporting letter, which also refers to other parts of the Plan which are not considered to be sound.			
Friends of Patrick's Field	LPPS50	Duty to Co-operate	No		No	Justified	We are dismayed that following the decision to add this as potential housing land we were not advised that this was due to happen and we only found out about this when we went to view this iteration of the local plan. We have less than 6 weeks in which to read and absorb hundreds of pages of very technical information. These are from a host of organisations and as lay people trying to obtain the knowledge to submit legal arguments as to the veracity of the plan and as to whether the arguments for the use of a particular parcel of land for building is sound. This does not seem to meet the definition of Duty to Co-Operate and therefore not legally compliant.			
Colella Steve	LPPS170	WFIDP	Yes	No	No	Justified Effective Consistent with National Policy	The WFIDP is flawed and unsound: 1. The proposed Hagley Bypass has not been costed, there are no alternative solutions and the proposal hasn't been consulted on. 2. It fails aspects of the NPPF 3. The development on Lea Castle and Eastern extension is unsustainable, it is unsustainable as regards traffic congestion impacts on the A456 and A491 and there are alternative sites for development that are sustainable.	Although the Hagley bypass is welcomed in principle there has been insufficient consultation, no alternative schemes, the one proposal is uncosted and there is no proposed direction or location where the bypass is to be. Equally the development proposals for Lea Castle and Eastern Extension are unsustainable when considered in terms of traffic impact assessments.	Yes	To ensure the Inspector has full regard to the impacts of development on other authorities such as Hagley and the A456 and A491
Summerfield Against Land Transformation	LPPS722	1.19	Yes		Yes	Justified	The plan, overall, is much improved and we welcome its reduction in Green Belt take. However the 'objective' assessment of need and populating growth are based on thin evidence, consistent opinion and doubtful methods e.g. 3 interviews with estate agents. Furthermore this material is spread over several supporting documents and their appendices - makes the arguments difficult to follow and therefore consultation on this problematic. Re 6 above: 1. The methodology needs to be more robust and clearly		No	

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							presented if effective consultation is to take place, 2. If the numbers advanced re need were too high and population growth too high - the number of homes said to be required area significant over supply and all this means in terms of cost and land requirement.			
Harrison Nikki	LPPS812	Ecological Appraisals	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Question if the preliminary ecological appraisal evidence should have included all sites that were being considered for allocation, in order to be consistent. These sites, if allocated will be redeveloped and habitat lost and as such (and prior to allocation) the ecological impacts should be considered. It is therefore considered that the ecological evidence is inconsistent and patchy, resulting in concerns whether the local plan is in fact justified.		Yes	
Environment Agency	LPPS968	Paragraph 1.19, SFRA Evidence Base		No		Justified Effective Consistent with National Policy	We note some further work has been undertaken since our previous response on the draft SFRA. For information, it should also be noted that revised climate change allowances have recently been published. However this does not change the current allowances assessed for fluvial or rainfall, but they may change in the new year (2019). *Policy recommendations 4.6 and 7.4 of the SFRA - Defences in Bewdley –* As an update (for your information), we are currently looking at a scheme to improve the efficiency of the defences at Bewdley called - Invest to Save – the scheme aims to make efficiency improvements to the flood defences making them more reliable etc. This is to be done through a combination of: installation 4 flood gates, 123m of glass panels, lockable clamps, change from demountable to 2.1m high posts, to 2-post sections. It should be noted that the proposed scheme does not change the defence level, the defence alignment or the standard of defence provided to Bewdley. The existing standard of defence will reduce as a consequence of climate change, and the proposed scheme will not change the rate of this. **<u>Assessment of un-modelled watercourses</u>** Further to previous comments, we sought some additional assessment be undertaken in regard to the site allocations OC/11, OC/12 and OC/13, picked up as having potential Flood Risk issues from ordinary (un-modelled) watercourses with	*Policy recommendations 4.6 and 7.4 of the SFRA - Defences in Bewdley –* As an update (for your information), we are currently looking at a scheme to improve the efficiency of the defences at Bewdley called - Invest to Save – the scheme aims to make efficiency improvements to the flood defences making them more reliable etc. This is to be done through a combination of: installation 4 flood gates, 123m of glass panels, lockable clamps, change from demountable to 2.1m high posts, to 2- post sections. It should be noted that the proposed scheme does not change the defence level, the defence alignment or the standard of defence provided to Bewdley. The existing standard of defence will reduce as a consequence of climate change, and the proposed scheme will not change the rate of this. **<u>Assessment of un-modelled watercourses</u>** Further to previous comments, we sought some additional assessment be undertaken in regard to the site allocations OC/11, OC/12 and OC/13, picked up as having potential Flood Risk issues from ordinary (un-modelled) watercourses with catchments less than 3km2.		

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							catchments less than 3km2. 13.2 of the SFRA states that the above sites are in table 13-1 however site OC/12 and OC/13 do not seem to be detailed within the table (13-1). 7.2 – We support the policy included which details Residual flood risk and risk of overtopping etc, as well as potential increase in frequency of such due to climate change. In accordance with our previous recommendations, it is clear that further work has been undertaken in regards to site allocation OC/11. Page 58 of the 'Level 2 detailed Site Summary Tables', the results show the majority (86%) of the site is located within Flood Zone 1. Further to this we note Policy 30.19 in the Local plan document states that development at this site must submit a site specific FRA. We would agree with the recommendation set out in Policy 30.19 and the majority of the site is likely to be developable – we would support point 5&7 of the Policy. Recommend changes to the SFRA evidence base as outlined in proposed modifications.	13.2 of the SFRA states that the above sites are in table 13-1 however site OC/12 and OC/13 do not seem to be detailed within the table (13-1). 7.2 – We support the policy included which details Residual flood risk and risk of overtopping etc, as well as potential increase in frequency of such due to climate change. In accordance with our previous recommendations, it is clear that further work has been undertaken in regards to site allocation OC/11. Page 58 of the 'Level 2 detailed Site Summary Tables', the results show the majority (86%) of the site is located within Flood Zone 1. Further to this we note Policy 30.19 in the Local plan document states that development at this site must submit a site specific FRA. We would agree with the recommendation set out in Policy 30.19 and the majority of the site is likely to be developable – we would support point 5&7 of the Policy.		
Worcestershire Wildlife Trust	LPPS403	Background evidence base	Yes	Yes	Yes		The WWT consider that the ecological evidence base as discussed in paragraph 1.19 is now both legally compliant and sound.		No	
Harrison Nikki	LPPS810	Transport Evidence Base	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The transport model does not include all proposed allocations. A significant example is area OC/13N which applies zero home but in the pre submission plan has around 1,100 homes. At present there is no sound evidence base which directly supports the deliverability of the emerging plan for Wyre Forest, in transport terms, and the evidence is neither robust nor credible.		Yes	
Barberry Hurcott Limited	LPPS926	Evidence Base	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	It is considered that the transport evidence is neither robust nor credible. It is also considered that the ecological evidence base is inconsistent and patchy, resulting in concerns over whether the Local Plan is in fact justified.		Yes	Due to the complexities of the issues of concern to the promoter, and the nature and the extent of public involvement in this site, it is considered that

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										further verbal clarification and discussion at the EiP Hearings will be essential, and will further assist the inspector.
Worcestershire County Council, Planning Economy & Performance	LPPS978	1.19					**Infrastructure Delivery Plan** WCC is one of the main infrastructure providers for the county, in its role as a Local Highway Authority, transport authority and education authority. The two authorities have worked jointly on the development of the Infrastructure Delivery Plan which sets out the infrastructure required to support the development aspirations of the plan. Works completed so far have included an initial assessment of the sites proposed at Preferred Options and detailed assessment of the sites for the current Pre-submission Plan, to outline the transport impacts and potential mitigation schemes, with some initial costings. For the Pre-submission Plan this included the transport modelling of the impacts of the proposals. A similar process was undertaken for education, to set out the impacts of any increase in school age population in the district and the mitigations which will be required. Unfortunately, the site list which was provided to support this work for the Infrastructure Delivery Plan is not the same site list as was included in the Pre-submission Plan itself. WCC will, therefore, need to undertake the detailed transport modelling and assessment again, with further considerations of the required transport mitigation. We propose to undertake this detailed work with WFDC during quarter 1 and 2 of 2019. This process will take approximately 4-6 months to complete. Concurrently, WCC will also remodel the education requirements of the plan to inform a revised version of the Infrastructure Delivery Plan. The outcome of this work will be required to support the Duty to Cooperate agreement between WCC and WFDC and form part of the Statement of Common Ground. **Viability** WCC note that, in line with the recommendations of the			

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							viability assessment which supports the WFDC pre-submission plan, the affordable housing requirement of the plan has been reduced to 25%. However, not all of the included highways schemes have been costed, or can be costed accurately at this stage as there are a number of dependencies including timescale, and interactions with other schemes and local plan aspirations. These matters notwithstanding, it is clear that the viability of the plan is constrained, which is not a reflection of the plan itself, but of the economic geography of the district. This places a very high burden on infrastructure providers such as WCC to either look for alternative sources of funding, which may or may not be available, or fund through their own resources. WCC do not have the resources to fund the infrastructure needs it has identified directly, and although funding may be available for transport, through either LEP or other government funding for example, the funding pots for new schools or to expand schools arising from local plan growth are very limited. Additionally, the viability assessment, where based on specific sites, appears to be at odds with the site numbers and allocations in the Pre-submission Plan itself. This may or may not have a material impact, but for the avoidance of any confusion and doubt, the site data should be consistent. Further work is required to address this issue.			
Worcestershire Wildlife Trust	LPPS402	Sustainability Appraisal	Yes	Yes	Yes		The WWT supports this paragraph and believes that the sustainability appraisal is fit for purpose, legally compliant and sound.		No	
Natural England	LPPS664	Paragraph 1.20 Sustainability Appraisal					We advise that the following should be addressed in the Appendix B Site Appraisal: BR/BE/6, Land off Highclere Priority habitats should be considered within these allocations. OC-13 LAND AT STONE HILL The site appraisal does not acknowledge that the water courses on site connect to Wilden Marsh and Meadows SSSI. This potential impact should be addressed through mitigation. We would welcome it if the SA was amended to better steer the policy towards this outcome. Although at this late stage in plan making, we would be satisfied to see the policy amended accordingly.	We advise that the following should be addressed in the Appendix B Site Appraisal: BR/BE/6, Land off Highclere Priority habitats should be considered within these allocations. OC-13 LAND AT STONE HILL The site appraisal does not acknowledge that the water courses on site connect to Wilden Marsh and Meadows SSSI. This potential impact should be addressed through mitigation. We would welcome it if the SA was amended to better steer the policy towards this outcome.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								Although at this late stage in plan making, we would be satisfied to see the policy amended accordingly.		
Kedd Development Limited	LPPS1058	Sustainability Appraisal	Yes	Yes	Yes		See proposed modifications.	The Local Plan needs to address the location of natural assets / mineral resources within its Sustainability Assessment to ensure aggregates are available close at hand to the proposed new residential allocations including Kidderminster Eastern Extension and Lea Castle Village. For the reason of holistic green infrastructure master planning and the sustainable use of local resources e.g. providing an option to limit the need to transport aggregates long distances for use in construction of these mixed use development sites.	Yes	To demonstrate the sustainable use of aggregate resources in respect of the Local Plan
Kedd Development Limited	LPPS181	Sustainability Appraisal	Yes	Yes	Yes		See proposed modifications.	The Local Plan needs to address the location of natural assets / mineral resources within its Sustainability Assessment to ensure aggregates are available close at hand to the proposed new residential allocations including Kidderminster Eastern Extension and Lea Castle Village. For the reason of holistic green infrastructure master planning and the sustainable use of local resources e.g. providing an option to limit the need to transport aggregates long distances for use in construction of these mixed use development sites.	Yes	To demonstrate the sustainable use of aggregate resources in respect of the Local Plan
Natural England	LPPS656	Paragraph 1.20 Sustainability Appraisal					Amendments suggested.	We advise that the following should be addressed in the Appendix B Site Appraisal: WFR/WC/15 WLEA CASTLE HOSPITAL The site appraisal does not acknowledge that there is a direct hydrological link to Hurcott and Podmore Pools SSSI, which could impact the SSSI. This potential impact should be addressed through mitigation. We would welcome it if the SA was amended to better steer the policy towards this outcome. Although at this late stage in plan making, we would be satisfied to see the policy amended accordingly. OC/13 LAND AT STONE HILL The site appraisal does not acknowledge that the water courses on site connects to Wilden	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								Marsh and Meadows SSSI. This potential impact should be addressed through mitigation. We would welcome it if the SA was amended to better steer the policy towards this outcome. Although at this late stage in plan making, we would be satisfied to see the policy amended accordingly.		
Shakespeare Caroline	LPPS548	1.24	No	No	No	Justified Effective	Not enough consultation too many poor decisions		No	
Bache Tony	LPPS15	1.26	Yes	No	Yes	Effective	It seems to me that allocating additional land for residential development in small villages is unsound. There are few opportunities for employment in these areas, so more housing will just create greater traffic flow and pollution. You need housing close to centres of employment.			
Shade Roger	LPPS678	Table 1.0.1	No		No		A number of drop in sessions were arranged around Wyre Forest. However, none were arranged in Churchill and Blakedown. Whilst I accept that none of the developments are within our parish there will be a significant detrimental effect on traffic through the villages. I live in a very close community which is not in touch with the rest of the district and few residents are aware of the problems that might occur. In my view the consultation was flawed.			
Hinksman Ian	LPPS1004	Table 1.0.1, Pre Submission drop in sessions	No	No	No	Justified Effective	Consultation - Traffic consultation held between 4.00 pm - 6.00 pm when most people are still at work or stuck in the existing traffic problems. Kidderminster recently quoted by Department of Transport as having one of the 10 slowest traffic speeds in the UK. This plan makes this worse.		No	

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Bareford David	LPPS116	2.3	Yes	No	Yes	Justified	The Local Plan estimates a population growth of approx. 5,000 in the next 20 years. In the same paragraph we are told that the 65+ age group will climb by 7,600. This means that the under 65 age group will contract by 2,600 and so one wonders the requirement for 5,520 houses and only 487 bed spaces for the elderly. Even if the population growth is 5,000 then the NPPF of 1.8 people/ house means we would only need 2,800 houses. If the NPPF estimates on 1.8 people/household then why are half the houses in the plan 3+ bedroom houses? I understand that at present Wyre Forest is high up in the league of homeless people, but this only equates to 211 persons so hardly a large backlog; and these people possibly only requiring affordable housing.	The housing needs should concentrate on the 7,000 extra elderly and realise there is a contraction of 2,000 in the under 65s.	Yes	To understand I am being heard and to hear a reasoned response.
Brudenell-Pryke Penelope	LPPS87	2.3	Yes	No	Yes	Positively Prepared Effective	Ageing population: We need to ensure that residential properties are suitable for our ageing population. Homes need to be well insulated, so that they are cheap and easy to keep warm, as well as keeping cool in the hotter summers which are to come. In addition the residents need to feel safe in their communities with good access to public transport. Effective street lighting is essential and choosing the cheapest LED lighting is not always the best long term option. For example PLEP lighting has been shown to be more energy efficient than most LED lights and has a more controllable light spread, resulting in the need for fewer light fittings. This also has the effect of lower maintenance costs. Community initiatives which bring together old and young residents in a common cause have been shown to be very effective in benefitting all concerned. Encouragement and enablement for this should be considered when planning new communities, such as Lea Castle.		No	
Parsonage Louise	LPPS147	2.4	Yes	No	Yes	Justified	With regard to planned developments in and near Cookley, I feel that the disproportionate scale will mean that the village will effectively join with Kidderminster. The village will lose its unique identity and will have the feel of a district of a large town.		No	
Parsonage Louise	LPPS161	2.8	Yes	No	Yes	Effective	I would challenge the assumption that public transport provision in Cookley and Blakedown is good; there are reliability issues with the provider, Diamond buses.		No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 2: KEY ISSUES AND CHALLENGES

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Bareford David	LPPS117	2.11	Yes	No	No	Positively Prepared	All these concerns do not appear to have been addressed, rather ignored, in this present consultation.		Yes	To understand we are being heard
Historic England	LPPS219	Table 2.0.1	Yes	Yes	Yes	Consistent with National Policy	The table continues to refer to 'historic assets'. Following an earlier meeting as part of the Plan process we understood this was to be amended.	Revise 'historic assets' to read 'heritage assets' in line with NPPF terminology for the avoidance of doubt.	No	

APPENDIX 3 LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 3: VISION FOR THE AREA

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Grounds	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Persimmon Homes Limited	LPPS795	Para. 3.1	Yes	No	Yes	Justified Effective	The Vision and Objectives for the District are generally supported but further precision on their wording would improve clarity and help to ensure that the Plan is positively prepared and effective.	The first bullet point should be expanded upon to clarify that the three main towns of Kidderminster, Stourport-on-Severn and Bewdley will be the focus for growth within the District. Paragraph 6.16 sets out that those urban areas of the District have the greatest housing needs. The fifth bullet point should seek to ensure that Bewdley can be enhanced and that the Plan allows for the right level of growth to ensure that it does not go into decline and to serve the needs of the District.	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination.
Persimmon Homes Limited	LPPS827	Para. 3.2	Yes	No	Yes	Justified Effective	The Aims and Objectives of the plan are generally supported. RPS does not consider that the Aims and Objectives are currently aligned with the Council's growth strategy and in particular, the overall objectives are not consistent with the Plan's need to release land from the Green Belt in appropriate locations in order to meet the Plan's housing need.	Plan Objective 6 refers to the protection and support of the Green Belt and states that limited strategic Green Belt will be identified for release through a strategic review of the Green Belt to enable the delivery of the plan. In order for the Plan to be more effective and positively prepared it should refer to a 'necessary and justified' level of Green Belt land being released, rather than a limited amount, in order to ensure that the level of development that is required within the District over the whole plan period can be achieved. A narrow focus on the 'limited' release of Green Belt land may result in immediate pressure for additional land to be released in the near future, rather than ensuring that the plan enables the revised Green Belt boundaries to endure in the longer term.	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination.
West Mercia Police	LPPS568	Table 3.0.1	Yes	Yes	Yes		West Mercia Police support the direct reference in paragraph (10) of Table 3.0.1 that by 2036 crime and disorder in the District remain low and local residents feel safer. This ensures the Local Plan's consistency with paragraph 91 of the National Planning Policy Framework 2018, which state that planning policies and decisions should create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. The reference in paragraph (10) also helps to ensure the alignment of Vision with the vision for Wyre Forest contained within the 'Single Sustainable Community Strategy for	Not applicable.	No	Whilst we do not consider it necessary to participate at the oral part of the examination, we would be happy to do so if the Inspector considered this to be beneficial to proceedings.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Grounds	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							Worcestershire, which similarly envisages a 'district where people want to live in and visit; where they feel free from the fear of crime...' Paragraph (10) also ensures consistency between the Vision and the following paragraphs and policies in the Local Plan on this topic: • Paragraph 5.5 (b) (iv) • Policy 9 (2) • Paragraph 11.11 • Policy 27A (xiii) • Policy 27C (C) (v) • Paragraph 27.21 Overall, the reference in paragraph (10) ensures an effective and sound message in the Vision. This will promote community safety, crime prevention and the provision where necessary of the design measures and infrastructure necessary to ensure this.			
Parsonage Louise	LPPS148	3.0.1 point 1	No	No	Yes	Justified	The size of the Lea Castle development is greatly in excess of the housing requirements for Cookley, as per the 2018 Housing Needs survey.		No	
Barberry Hurcott Ltd	LPPS780	Vision and Objectives	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	In regards to the vision and objectives section, there is no mention of housing for people with special needs (only older people); the range of planned sectoral jobs appear to include retail – which is in serious decline; there is to be a growth in highly skilled new jobs and significant infrastructure improvements, but very little in the way of evidence to support how this might happen, in reality. Affordability in the District continues to be a significant challenge, and has worsened over the last 10 years, particularly affecting local people looking to buy their first home.		Yes	Due to the complexities of the issues of concern to the promoter, and the nature and the extent of public involvement in this site, it is considered that further verbal clarification and discussion at the EiP Hearings will be essential, and will further assist the inspector.
Historic England	LPPS220	Table 3.0.2	Yes	No	Yes	Consistent with National Policy	Table 3.0.2 now includes Objective 8 for the historic environment which is generally welcomed. However, the objective does not refer to enhancement or setting so does not address requirements of the NPPF which would be necessary in order to demonstrate a positive approach to the historic environment.	Revise the wording of Objective 8 as follows: 'To promote the historic environment and conserve or enhance the significance of heritage assets and their setting in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.'	No	
Barratt Homes	LPPS762	Table 3.0.2-	Yes	No	Yes	Effective	The plan objectives should recognise to prioritise	The plan's aims should be amended to include an	Yes	We wish to attend the

APPENDIX 3 LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 3: VISION FOR THE AREA

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Grounds	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
West Midlands		Wyre Forest Development Plan-Aims and Objectives				Consistent with National Policy	the use of non Green Belt sites adjacent to the urban area, before Green Belt land release.	additional plan objective. The additional plan objective should specify that the plan seeks to make the best use of underutilised land and the plan has sought to identify suitable underused sites for development in order to help minimise the amount of Green Belt land that is required for development.		examination as the plan's approach to the identification of development sites, including Green Belt land release, is a key issue. It must be ensured that the aims and objectives of the plan properly reflect the strategy that has been adopted.
Worcestershire Wildlife Trust	LPPS355	Table 3.0.2 Aim and Objectives	Yes	Yes	Yes		WWT note the text in bullet point seven regarding the need to safeguard and enhance the district's biodiversity. Protecting and enhancing the natural environment is an essential requirement in delivering a sound local plan and WWT fully support the inclusion of this important wording.		No	
Harrison Nikki	LPPS813	Point 8 of table 3.0.2-Employment Land	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	It is noted that the council appears to be re-allocating a number of longstanding employment sites. There does not appear to be evidence to support such a strategy. Has the council robustly reviewed these sites with commercial agents to establish a realistic view of their development prospects?		Yes	
Seymour Vicki	LPPS59	Kidderminster Eastern Extension Concept Plan	No	No	No	Justified Effective	The land surrounding Offmore Farm is prime agricultural land, we cannot afford to lose prime, productive agricultural land such as this. The higher level of the land at the rear of current properties is much higher than the existing properties and would be visible from the whole of Offmore. The lower land is prone to flooding which affects the farm land, the roads and properties. Any development in this area would increase the flood risk. The drive to the courtyard is vulnerable where it runs along the farmland and any development of this land would increase the vulnerability of the driveway. There is also a soak away onto the farmland from properties. The proposed public right of way would increase the vulnerability at the rear of our properties as the public right of way is proposed to go across	The environment needs to be preserved to protect the existing wildlife, including badgers, bats and newts. No building on high areas that will overpower existing properties. No building on low ground which is a flood risk. Larger are of Green Belt left around existing properties to preserve and protect the wildlife.	No	

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							the back of our properties. There is a shared area of land that links Offmore Farm Court and the Offmore First Care Home to Offmore Farm Close which we have had no consultation on. There has been no consultation regarding the public right of way across this shared land and I would not agree to this. The introduction of a traffic island opposite Shakespeare Drive will cause chaos. The infrastructure will not support the additional vehicles and the area will be grid locked and will create an accident black spot. At the rear of our properties, there is a large protected badger set which has been established there for many years. We also have bats and a variety of newts on the land. The environment should be protected in order to preserve the habitat for this wildlife which is well established.			
Taylor Wimpey West Midlands	LPPS994	Vision, Aims and Objectives		Yes			**Comberton Road Kidderminster** The amended Vision set out in Table 3.0.1 is broadly supported. The Vision rightly seeks to ensure the District's housing market provides a choice of accommodation responding to local needs and that housing delivery is balanced with jobs creation within the District. To achieve this Vision it will be necessary to provide the right number of new homes to attract and retain economically active residents within the District to support the economic growth ambitions. The Vision recognises the role of Kidderminster within the District as a focus for retail and commercial leisure opportunities, supporting a vibrant visitor economy and evening economy. In addition, the Vision highlights brownfield opportunities that are available and seeks to remedy current infrastructure issues, including traffic congestion in the town centre. Whilst it is recognised that brownfield opportunities exist within Kidderminster, these opportunities are finite and following successful regeneration of many of these sites in the past 10 to 20 years, the role that these sites can play in viably delivering development requirements has		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Grounds	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							significantly diminished. The Vision envisages that new development is properly supported by the timely provision of suitable infrastructure. Taylor Wimpey recognises that the delivery of new nfrastructure will be necessary to support new development to mitigate for needs arising from new residents and the opportunities that may exist for assisting in delivering strategic infrastructure projects that have a far wider benefit to businesses and residents within the District and could assist in addressing a number of the highlighted issues. It is noted that the Pre-Submission Publication document updates this Vision to include reference to the Kidderminster Eastern Extension as a well-designed residential development offering a choice of high quality new homes set within an extensive new area of green space. Taylor Wimpey endorses this reference as the Kidderminster Eastern Extension represents a strategic element of the spatial strategy for the District to 2036. The Plan's Aim and Objectives are also supported by Taylor Wimpey. The Plan Objectives of: addressing housing need; supporting economic growth; identifying Green Belt release through a strategic review; and improving connectivity within the District to achieve more sustainable travel patterns are key components of delivering the Plan aim of ensuring *"Wyre Forest will be a District where people want to live and work and fulfil their potential without the excessive need for travel."*			
Taylor Wimpey West Midlands	LPPS424	Vision, aims and objectives		Yes			**Land at Bewdley Road North Stourport** The amended Vision set out in Table 3.0.1 is broadly supported. The Vision rightly seeks to ensure the District's housing market provides a choice of accommodation responding to local needs and that housing delivery is balanced with jobs creation within the District. To achieve this Vision it will be necessary to provide the right number of new homes to attract and retain economically active residents within the District to support the economic growth ambitions. The Vision recognises the role of Stourport-on-		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Grounds	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							Severn in offering a range of facilities to local residents and visitors, and its canal and riverside remain a key visitor attraction. Stourport-on-Severn is also identified as a 'primary focus' for a sustainable economy within Wyre Forest District, with a sustainable transport network that delivers high levels of accessibility to key services and attractions by a variety of modes of transport. Whilst it is recognised that brownfield opportunities exist within Stourport-on-Severn, these opportunities are finite and following successful regeneration of many of these sites in the past 10 to 20 years, the role that these sites can play in viably delivering development requirements has significantly diminished. The Vision envisages that new development is properly supported by the timely provision of suitable infrastructure. Taylor Wimpey recognises that the delivery of new infrastructure will be necessary to support new development to mitigate for needs arising from new residents and the opportunities that may exist for assisting in delivering strategic infrastructure projects that have a far wider benefit to businesses and residents within the District and could assist in addressing a number of the highlighted issues. The Plan's Aim and Objectives are also supported by Taylor Wimpey. The Plan Objectives of: addressing housing need; supporting economic growth; identifying Green Belt release through a strategic review; and improving connectivity within the District to achieve more sustainable travel patterns are key components of delivering the Plan aim of ensuring *"Wyre Forest will be a District where people want to live and work and fulfil their potential without the excessive need for travel*."			Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	LPPS1013	Vision , Aims and Objectives		Yes			**Land at Rectory Lane Areley Kings** The amended Vision set out in Table 3.0.1 is broadly supported. The Vision rightly seeks to ensure the District's housing market provides a choice of accommodation responding to local needs and that housing delivery is balanced with		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Grounds	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							jobs creation within the District. To achieve this Vision it will be necessary to provide the right number of new homes to attract and retain economically active residents within the District to support the economic growth ambitions. The Vision recognises the role of Stourport-on-Severn in offering a range of facilities to local residents and visitors, and its canal and riverside remain a key visitor attraction. Stourport-on-Severn is also identified as a 'primary focus' for a sustainable economy within Wyre Forest District, with a sustainable transport network that delivers high levels of accessibility to key services and attractions by a variety of modes of transport. Whilst it is recognised that brownfield opportunities exist within Stourport-on-Severn, these opportunities are finite and following successful regeneration of many of these sites in the past 10 to 20 years, the role that these sites can play in viably delivering development requirements has significantly diminished. The Vision envisages that new development is properly supported by the timely provision of suitable infrastructure. Taylor Wimpey recognises that the delivery of new infrastructure will be necessary to support new development to mitigate for needs arising from new residents and the opportunities that may exist for assisting in delivering strategic infrastructure projects that have a far wider benefit to businesses and residents within the District and could assist in addressing a number of the highlighted issues. The Plan's Aim and Objectives are also supported by Taylor Wimpey. The Plan Objectives of: addressing housing need; supporting economic growth; identifying Green Belt release through a strategic review; and improving connectivity within the District to achieve more sustainable travel patterns are key components of delivering the Plan aim of ensuring *"Wyre Forest will be a District where people want to live and work and fulfil their potential without the excessive need for travel*."			of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 4: CORE POLICIES INTRODUCTION

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
CORE11	LPPS73	4 : 4-1: a - u	Yes	No	Yes	Positively Prepared Justified Consistent with National Policy	The document is generally consistent with the government notice; The Core strategy, as adopted by Wyre Forest for its LDP. It presents the Core Policies. Therefore is positive and justified. The document will be effective when the Master Plan is in place. Soundness, is suspect, as some important infrastructure aspects are vague at this stage.	Detailed maps showing exact roads and paths are needed before a sound exam can be done. Documents for The exact, "statutory" open space; play areas / Any shops; doctors; parks, or possible pub or adult recreation is required to make the document sound. To say 50% is to be allocated open space is vague. Also the name and district of the new developments must be produced. The land to the eastern side of Offmore is in some part, already Offmore and Comberton Open Space, albeit inaccessible.	No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Marmaris Investments Ltd.	LPPS839	Policy 5A	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	The 2 bullet points at the end of the policy are not required and add nothing to the understanding of the policy and merely recite national policy. These should be deleted.	2 bullet points at end of policy should be deleted	Yes	Green Belt / Transportation / Housing issues are important areas of the plan and inclusion in the debate at the examination will be useful to the Inspector
Taylor Wimpey West Midlands	LPPS995	Policy 5A		No		Consistent with National Policy	**Land at Comberton Road Kidderminster** Policy 5A broadly reflects national guidance and is broadly consistent with the presumption of sustainable development that is at the heart of the National Planning Policy Framework. Paragraph B should be updated to reiterate that planning applications that accord with the policies contained within the Development Plan will not only be approved (subject to material considerations), but be approved 'without delay,' to ensure consistency with paragraph 11 of the NPPF. Whilst the policy sets out the Council's approach to implementing the presumption in favour of sustainable development through the determination of planning applications, it is essential that the policies and proposals set out with the Local Plan as a whole, positively seek opportunities to meet the development needs of Wyre Forest, including the appropriate housing needs and provide necessary flexibility to adapt to rapid change. Further views on this aspect are considered further within these representations.	Update paragraph B to reiterate that planning applications that accord with the policies contained within the Development Plan will not only be approved (subject to material considerations), but be approved 'without delay,' to ensure consistency with paragraph 11 of the NPPF	Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	LPPS484	Policy 5A		No		Consistent with National Policy	**Land at Bewdley Road North Stourport** Policy 5A broadly reflects national guidance and is broadly consistent with the presumption of sustainable development that is at the heart of the National Planning Policy Framework. Paragraph B should be updated to reiterate that planning applications that accord with the policies contained within the Development Plan will not only be approved (subject to material considerations), but be approved 'without delay,' to ensure consistency with paragraph 11 of the NPPF.	Update Paragraph B to reiterate that planning applications that accord with the policies contained within the Development Plan will not only be approved (subject to material considerations), but be approved 'without delay,' to ensure consistency with paragraph 11 of the NPPF.	Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							Whilst the policy sets out the Council's approach to implementing the presumption in favour of sustainable development through the determination of planning applications, it is essential that the policies and proposals set out with the Local Plan as a whole, positively seek opportunities to meet the development needs of Wyre Forest, including the appropriate housing needs and provide necessary flexibility to adapt to rapid change. Further views on this aspect are considered further within these representations.			Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Gladman Developments Ltd	LPPS855	Policy 5A	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	In principle, Gladman are fully supportive of the direction taken in Policy 5A, which sets out that decisions will be made in accordance with the presumption in favour of sustainable development and affirms the Council's commitment to making local planning decisions based on the delivery of sustainable development. This should provide assurance of a local approach to planning that will actively seek to improve the social, environmental and economic wellbeing of the area by ensuring that development demonstrably contributes to the specific strategic and local vision and objectives of the WFLP. Notwithstanding this, Gladman believe that the above policy could go further in its approach to ensuring the delivery of sustainable development in line with the ethos of achieving the delivery of sustainable development required by the Framework which is key to assessing planning proposals and should be reflected in the policy wording through a localised approach linked to the vision and objectives of the Plan.		Yes	To discuss the issues raised in our written representations
Taylor Wimpey West Midlands	LPPS1014	Policy 5A		No		Consistent with National Policy	**Land at Rectory Lane Stourport** Policy 5A broadly reflects national guidance and is broadly consistent with the presumption of sustainable development that is at the heart of the National Planning Policy Framework. Paragraph B should be updated to reiterate that planning applications that accord with the policies contained within the Development Plan will not only be approved (subject to material considerations), but be approved 'without delay,'	Update Paragraph B to reiterate that planning applications that accord with the policies contained within the Development Plan will not only be approved (subject to material considerations), but be approved 'without delay,' to ensure consistency with paragraph 11 of the NPPF.	Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							to ensure consistency with paragraph 11 of the NPPF. Whilst the policy sets out the Council's approach to implementing the presumption in favour of sustainable development through the determination of planning applications, it is essential that the policies and proposals set out with the Local Plan as a whole, positively seek opportunities to meet the development needs of Wyre Forest, including the appropriate housing needs and provide necessary flexibility to adapt to rapid change. Further views on this aspect are considered further within these representations.			participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
West Mercia Police	LPPS565	Paragraph 5.5 (b) (iv)	Yes	Yes	Yes		West Mercia Police fully support the inclusion of this reference and agree that the achievement of it is a fundamental component of truly sustainable development. It also ensures the Local Plan is consistent with paragraph 91 of the National Planning Policy Framework (2018) on the same subject. Paragraph 5.5 (b) (iv) also accords with national planning practice guidance, which states: "... The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation..." Paragraph: 010 Reference ID: 26-010-20140306 Revision date: 06 03 2014 Therefore, the inclusion of the reference will ensure the effectiveness and soundness of the Local Plan.	Not applicable.	No	Whilst we do not consider it necessary to participate at the oral part of the examination, we would be happy to do so if the Inspector considered this to be beneficial to proceedings.
Historic England	LPPS222	5.5 c(vi)	No	No	Yes	Positively Prepared Effective Consistent with National Policy	Para 5.5 c(vi) does not refer to all heritage assets, e.g. Conservation Areas are not mentioned, or setting as part of the environmental role of the Plan. It is not clear why these are not included.	Revise the wording of this point to ensure it addresses all heritage assets and their setting – 'heritage assets and their setting' could be used instead of setting out individual assets and would cover designated and non-designated heritage assets in line with NPPF requirements and terminology and for the avoidance of doubt to ensure	No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								the Plan sets out a positive approach to the historic environment.		
Parsonage Louise	LPPS151	b iii	No	No	Yes	Justified Consistent with National Policy	The village identity of Cookley will be lost by the addition of 1400 houses, together with building many houses in the nearby districts of Kidderminster.		No	
Parsonage Louise	LPPS153	5.5 C iv	No	No	Yes	Justified Effective Consistent with National Policy	Large scale developments will increase pollution, there is no realistic expectation that use of public transport will increase, especially given the limitations of current provision.		No.	
Parsonage Louise	LPPS152	c vii	No	No	Yes	Justified Effective Consistent with National Policy	Excessive building in green spaces does erode the green infrastructure, rather than protecting it.		No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Taylor Wimpey West Midlands	LPPS1015	Policy 6A		No		Positively Prepared Effective	Land at Rectory Lane Stourport *Market Housing* The Council has prepared a range of technical evidence to inform the preparation of the new Local Plan. To determine the housing requirements for Wyre Forest, the local planning authority has commissioned consultants to identify the appropriate housing need taking into consideration relevant factors identified in the NPPF and Planning Practice Guidance. The Council's Housing Needs Study (HNS 2018) has regard to the Government's standard method for calculating housing need and identifies a minimum 276 dwellings per year utilising the most up-to-date sub-national household projections (2016 SNHP). It is noted that the HNS 2018 considers further scenario analysis to verify whether the figure provided by the Government's standard method is appropriate to Wyre Forest. This approach is supported by Taylor Wimpey as the PPG 2018 states that the standard method *"does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore there will be circumstances where actual housing need may be higher that the figure identified by the standard method."* The Demographic Update paper (October 2018), which considers a number of economic and demographic scenarios, recognises through the demographic scenarios that the MHCLG derived figure of 276 dpa relates to 'household' change and does not factor in an allowance for vacant properties to derive 'dwelling' change within the District. Converting 'household' change to 'dwelling' change would result in a housing need of 286 dpa. This is supported as a robust figure and would assist in supporting economic growth aspirations within the District. Concern is also raised in respect of the employment-led scenarios in that they do not appear to reflect the economic growth aspirations of the area. Wyre Forest District Council is within the Greater Birmingham & Solihull and Worcestershire Local Enterprise Partnership areas. It is important that the level of housing provision proposed is consistent with the aspirations of the LEPs. Having reviewed the evidence, it appears that such economic aspirations have not been tested and it is unclear whether the level of dwelling provision is appropriate to meet those needs. It is suggested that further work is commissioned to test whether the dwelling requirement is fit for purpose and is joined up with other strategies and plans to achieve wider strategic aspirations.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							It is noted that the MHCLG has recently consulted on a number of changes to the standard method, including an approach to reverting to the 2014 SNHP in determining housing need. If the Wyre Forest District local housing need figure is re-calculated using the 2014 based household projections (2014 SNHP) and 2017 affordability ratio the resultant figure is 4,920 dwellings (246 dwellings per annum). However, this lower figure would undermine the ability for economic aspirations to be met, reduce the ability for affordable housing needs to be met and would again not take account of vacant properties within the District. *Affordable Housing* The Council's Housing Needs Study 2018 has identified a significant affordable housing need of 158 dwellings per annum in the District representing 57% of the promoted local housing need. It is noted that in Wyre Forest median house prices have increased from £69,000 in 2000 to £174,000 in 2017. In 2017 the median house price to median earnings ratio was 7.79 meaning that it is unaffordable for many local people to buy or rent in the District. The delivery of affordable housing is an important consideration in determining the Council's housing requirement figure. The scale of affordable housing required in Wyre Forest therefore places further importance on retaining a higher housing requirement to ensure these needs can be met. *C2/ Institutional/ Care Home* A separate figure of 487 bed spaces for C2 use (Institutional/Care Home bedspaces) is supported and will assist to ensure the specific needs of the population are met. The principle of separating the C2 use requirement from the C3 requirement is supported, however on this basis any consideration of the housing land supply position contained within the housing trajectory should also exclude the C2 use provision. *Employment Land* The Local Plan gives a figure of 29ha of employment land that will be brought forward in the period up to 2036. This requirement is informed largely by the October 2018 Employment Land Study Update (ELS) undertaken by Lichfields, which correctly notes that the Wyre Forest District economy has seen historic sharp job decline since 1997. In addition, the Experian econometric job growth projections appear unduly pessimistic, projecting just a 2.8% growth in jobs between 2016 and 2036. This has informed the proposed 29ha employment land requirement set out within the Local Plan and appears to reflect past trends. However, a concern with the 29ha employment land requirement			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							is that it does not appear to take into account what could be needed in the event of Wyre Forest seeing stronger economic growth linked to the aspirations of the Local Enterprise Partnerships in which the District lies. For example, the Worcestershire Local Enterprise Partnership's Strategic Economic Plan has a vision to grow the LEP economy by 25,000 jobs by 2025 and to support growth sectors such as advanced manufacturing. It is unlikely that Wyre Forest District will make much of a contribution to this target if its economy only grows under baseline conditions. Consideration should therefore be given to increasing the quantum of employment land brought forward by the Local Plan. If employment growth is increased, the level of housing need should be reconsidered accordingly to ensure a jobs balance ratio that ensures a level of self-sufficiency and sustainability			
South Staffordshire Council	LPPS605	Policy 6A(B)					South Staffordshire Council does not consider the plan as proposed to be 'unsound' however we wish to submit the following comments in respect of Policy 6A(B) in the Pre-Submission Local Plan Publication. The inclusion of this policy is welcomed in particular the recognition that Wyre Forest could make a contribution towards meeting the identified housing supply shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). South Staffordshire would however request that Wyre Forest reconsider the present approach of restricting such considerations to a non-specified future review. The potential scale of the housing supply requirements and shortfall within the GBBCHMA has been evidenced through the adoption of the Birmingham Development Plan 2031 and the subsequent GBBCHMA Growth Study (2018). It is the view of South Staffordshire District that it would be consistent with the Duty to Co-operate requirements for Wyre Forest to more actively consider a contribution towards meeting the GBBCHMA shortfall as part of the current local plan review process. The comments included in this email are still subject to the formal Council scrutiny process and I would be grateful if you would consider them as a holding reply until such time as I can confirm the decision has been made.			
Harrison Nikki	LPPS757	.Policy 6A-Development Needs	No	No	No	Positively Prepared Justified Effective Consistent	In terms of dwellings required in policy 6A the council has clearly sought to do the minimum. The council should at the very least follow the dwelling led scenario identified in figure 9 of the Edge Analytics Demographic update (2018) which identifies an annual need of 286 dwellings. This would lead to a creation of 128 jobs	Change the annual need of dwelling to 286 per annum.	Yes	

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						with National Policy	per annum and will help to plan positively for growth in the district.			
Euro Property Investments Ltd.	LPPS792	Policy 6A	Yes	Yes	Yes		The housing need figure set out in the policy has been informed by the standard method included in the updated Framework and Planning Practice Guidance and calculated using the 2016-based household projections. As such, we have no specific comments on the actual figure included in the Plan. Notwithstanding this, we note that the Government have recently concluded consultation on revisions to the Standard Method, specifically relating to whether the 2014-based household projections should be used over the 2016-based household projections. Whilst we will not prejudge the outcome of this consultation, the Council may need to keep matters under review as it progresses to the submission of its Local Plan for Examination. If revisions to the standard method do result in additional housing need being identified for the District, the draft allocations that have been identified should continue to be included to meet this, but additional allocations may well be needed to be proposed to meet any additional need. We welcome the Council's approach to over allocating sites against the current housing need figure in order to protect against the potential of sites not coming forward as anticipated. In effect a non• implementation allowance of 15% has been built in to the Plan which is supported. Clearly, if all allocated sites do come forward then this would have the added benefit of delivering more housing than is needed, which would help to achieve the Government's objective of significantly boosting the supply of housing as set out in 59 of the Framework	None	Yes	We are promoting one of the four draft residential allocations in Bewdley and therefore key to the delivery of new housing in the settlement
Marmaris Investments Ltd.	LPPS840	Policy 6A	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	The policy should refer to the levels of development as 'minimum' levels of development (as in Policy 8A)	Table 6.0.1 should refer to amount of development required as a minimum figure	Yes	Green Belt / Transportation / Housing issues are important areas of the plan and inclusion in the debate at the examination will be useful to the Inspector
Home Builders Federation (HBF)	LPPS904	Policy 6A		No	No	Positively Prepared Justified Effective Consistent with National	The Housing requirement figure is the minimum starting point. It is important that housing need is not underestimated. If the council decides to re-consider its local housing need calculation, it is encouraged to retain its 276 homes per year requirement.	The HBF recommends that the council is as ambitious as possible with its housing requirement figure.		

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY

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						Policy				
Gillespie Gaynor	LPPS955	6A		No		Justified Consistent with National Policy	<u>Call for Sites and HELAA</u> 1.1 In 2015, the land at Captains, Bromsgrove Road, was submitted into the call for sites and representations were made into the issues and options consultation. The subsequent HELAA in 2016 included the site as being 1.23ha of brownfield land and 1.75ha of greenfield land (at this time the site was both Captains and the adjacent property the Lodge), with the total site capable of providing 135 dwellings (ref: WFR/ST/1). The HELAA commented that the brownfield elements of the site could deliver housing within 5 years, as this would not require land to be taken out of the Green Belt. The remainder of the site was considered potentially developable after 5 years, as this land would need to be released from the Green Belt. <u>Green Belt Review April 2017</u> 1.2 In April 2017, the Amec Foster Wheeler Green Belt Review concluded that "the site makes only a limited contribution to Green Belt purposes, being well bounded with limited visual connection". 1.3 With regards to the effect of development on openness, this Review concluded that "development would extend the current built edge of Kidderminster along the A448 but this would not be substantial and would be visually contained by substantial boundary vegetation". 1.4 In more detail, the Review concluded: To check the unrestricted sprawl of large built-up areas — Limited contribution: development on this site would create a logical rounding off of the built edge of Kidderminster without creating sprawl along the A448 To prevent neighbouring towns merging into one another — Limited contribution: development would not contribute to coalescence To assist in safeguarding the countryside from encroachment — Limited contribution: the bounded character of the site means that development would not create a sense of encroachment into open countryside To preserve the setting — Limited contribution: the site has no	Site WFR/ST/1 should be included as a core housing site.	Yes	To update the inspector on further ecological and tree surveys carried of at the appropriate times of the year to inform how much of the site is available for development whilst protecting and improving biodiversity.

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							and special character of historic towns role in this respect Overall assessment of contribution to Green Belt purposes: Limited contribution: The site makes only a limited contribution to Green Belt purposes, being well bounded with limited visual connection. Development would extend the current built edge of Kidderminster along the A448 but this would not be substantial and would be visually contained by substantial boundary vegetation (p.36 Appendix C Green Belt Review April 2017) 1.5 This assessment of the site was unaltered in the Green Belt Review Part II Site Analysis published in May 2018 <u>Preferred Options Sustainability Appraisal Report May 2017</u> 1.6 In Appendix G.4 Local Plan Review Site Testing Tables – Kidderminster East, this site WFR/ST/1 was identified as having "the potential to enhance the landscape by developing land that currently has a minor negative impact". The site was recognised as involving the redevelopment of a brownfield site and "thus development has the potential for a significant positive effect". 1.7 Of the 13 sustainability appraisal objectives used (two of which were divided into two scores within each objective), this site scored "major positive" (development would resolve an existing sustainability problem) in three of the objectives, "minor positive" (no sustainability constraints) in six of the categories, "neutral" in four of the objectives, N/A in one objective and a "minor negative" (potential sustainability issues, mitigation and/or negotiation possible) in the objective "to maintain the integrity of the Green Belt within the District". 1.8 This site did not score any "major negative" (problematic and improbable due to sustainability issues, mitigation is likely to be difficult and/or expensive) or any "absolute constraints". 1.9 Objective 9 considered the objective of conserving and enhancing the District's biodiversity and geodiversity and development of this site was considered "neutral" in its potential to adversely affect nationally protected sites and was considered "minor positive" in its potential to adversely affect locally			

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							protected sites. <u>Local Plan Review Preferred Options (June 2017)</u> 1.10 Consequently, in the preferred options publication June 2017, site WFR/ST/1 was the only potential site south of A448 Bromsgrove Road identified as a core housing site (i.e. a site common to both options A and B). Sites north of A448 Bromsgrove Road were also identified as core housing sites. Other sites south of Bromsgrove Road, surrounding this site WFR/ST/1 were included as option A housing sites only. In essence, option B sites were those identified as core housing sites and option A housing sites were proposed as additional to these option B core housing sites. The option A sites would require additional infrastructure. Clearly, WFR/ST/1 was seen as a site that could be brought forwards to meet housing needs without greater investment in infrastructure than required to meet the other core housing sites included in option B. <u>Preliminary Ecological Appraisal of potentially ecologically sensitive sites on WFDC's list of sites for allocation in the 2018 Local Plan (June 2018)</u> 1.11 The appraisal identified features of biodiversity significance that could affect development of this site: • Wet woodland adjoining the Captain's and Stanklyn Pools and Spennells Valley LWS. • Drain and associated vegetation • Tall hedgerows – although the Leyland cypress trees are of very low ecological value, they do form substantial corridors across the site, along which bats and birds might commute. *Recommendations were therefore:* • Buffer the wet woodland and Captain's Pool by at least 50m and design the site to draw footfall away from/prevent access to the sensitive LWS receptor • Ensure that surface water is appropriately managed away from the wet woodland • A management plan should be produced to eradicate non-native species from the site (see section 4.1.2), including the Leyland cypress trees – although bat surveys should be carried out first • Extensive bat presence/absence and activity surveys,			

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							covering buildings and the wider site should be carried out to find out how bats use it for commuting and foraging. This information should be used to inform site layout and mitigation and compensation measures for bats, including fulfilling the connectivity function (if any) of the Leyland cypress hedgerows. • Full botanical surveys of the grassland are recommended when it has not been recently mown, to check for plant species of interest (e.g. the S41 species recorded nearby by WBRC). <u>Sustainability appraisal of the Pre-Submission Publication Draft Wyre Forest District</u> <u>Local Plan published October 2018</u> 1.12 This site receives a "neutral" score for local services and facilities, need to travel and sustainable travel modes, economy and employment and for community and settlement identities. It scores "minor positive compared to the current situation – no sustainability constraints" for housing needs of all. For soil and land, water resources and quality, flood risk, landscape and townscape and for Green Belt, it scores a "minor negative compared to the current situation – potential sustainability issues, mitigation possible". For historic environment it scores "neutral uncertain" and for biodiversity and geodiversity it scores "major negative compared to the current situation – problematic sustainability issues, mitigation difficult and/or expensive". <u>Local Plan Review Preferred Options (June 2017) summary of consultation responses published October 2018</u> 1.13 The WFDC officer comments for this site read: "This site is not proposed for allocation in this local plan. Limited development may still be possible based on existing footprint of development. Key issue is impact on ancient woodland and pools and streams complex which would severely limit the developable area." (Appendix 3b Kidderminster Urban Extensions) **MERITS OF THIS SITE** 2.1 It is in sole ownership and there are no known legal constraints to development of this site, which could be delivered within five years. There is the potential to provide a minimum of 70 dwellings on the site, subject to further ecological survey work			

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							being carried out, which may show that more land is available for development than can be confirmed at this time. Housing mix, including affordable housing, would be in accordance with current policies. The site has mains water and sewerage, electricity and gas, with good access onto the public highway A448 Bromsgrove Road. There are no known abnormal costs, other than a programme of works to provide ecological and biodiversity enhancement, and no known issues that would influence economic viability. There are no bad neighbour uses; the current low- key caravan storage use would cease. The site lies in a sustainable location, adjacent to the existing Spennells residential development. 2.2 Development of this site meets all of the relevant principles in proposed policy 6B Locating New Development, as it provides for accessible housing to meet objectively assessed needs, it makes effective re-use of accessible, available and environmentally acceptable brownfield land, it will safeguard and enhance the open countryside, it will have limited effect on the openness of the Green Belt and will be development adjacent to the urban area, where both housing needs and accessibility to more effective public service provision are greatest. 2.3 Until the publication of the Council's preliminary ecological appraisal (PEA) in June 2018, this site WFR/ST/1 was judged by the Council to be a good site for housing development. The Council has acknowledged that there will need to be Green Belt releases to meet projected housing needs and this site has been determined to make only a limited contribution to the purposes of land being included in the Green Belt. It was considered that development on this site would have limited effect on the openness of the Green Belt. 2.4 There is a local desire, expressed in the preferred options publication draft, that the number and scale of greenfield sites taken for development should be as small as possible. The major part of this site (2.1ha) is brownfield (see plan 8797-101 attached as **Appendix 1** to these submissions) and development on this site would thus meet this objective. 2.5 The Preferred Options Sustainability Appraisal recognised that there was potential to enhance the landscape by developing land that currently has a minor negative impact. **NEW EVIDENCE**			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY

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							3.1 None of the recommendations in the Council's PEA prevent development of this site, they simply seek to protect and enhance the existing value of some parts of the site through measures to buffer the wet woodland and Captain's Pool by at least 50m, restrict public access, manage surface water appropriately, and carry out standard tree, protected species and botanical surveys to inform the site development 3.2 It is, unfortunately, the wrong time of year to carry out any detailed survey work of the site. Nonetheless, Swift Ecology were commissioned to provide an initial assessment of the relevant documents and a site visit was made in early December. Swift Ecology have since produced an ecological constraints and opportunities plan (ECOP attached as **Appendix 2** to these submissions). <u>Summary of Swift Ecology's initial comments:</u> *Main constraints:* • The WCC/Severnscape Preliminary Ecological Appraisal (2018) report recommends a minimum 50 m buffer of the designated Local Wildlife Site and ancient woodland. It may well be possible to reduce this buffer; this would need to be informed by further ecology surveys and information on the feasibility and effectiveness of mitigation for issues such as drainage, lighting, pollution and disturbance in order to demonstrate that the LWS will not be adversely impacted. At this stage we don't have enough evidence to specify and justify a smaller buffer, so the ECOP shows the full 50 m buffer to the LWS/ancient woodland. • Captain's Pool: recommend scrub planting in the buffer (whatever the size of the buffer) to limit public access to the pool and thereby protect wetland birds and their breeding/wintering habitats; drainage/pollution and lighting issues will also need consideration. • Ancient woodland: the buffer distance needs to be evidence-based (see guidance from The Woodland Trust). The key issues in determining the extent of the final buffer will be the ecological importance of the woodland and the site hydrology/drainage design. The ecological importance of the woodland can only be established through further survey (the optimal time for woodland botanical surveys is April-May). • Brook in southern part of the site. This will need buffering			

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							and could potentially be enhanced (see opportunities below). Minimum 5 m buffer along the banks based on EA guidance for minor watercourses has been included in the ECOP. • The mature cypress hedges provide a good network across the site and might be important for foraging/commuting bats. Further bat surveys would be needed to establish their importance. • The grassland across the site will need a more detailed survey in summer (May- July) to determine its importance. From the preliminary survey it seems unlikely that the grassland will be of high quality; however, if some or all of the grassland *is* identified as priority habitat, mitigation will be needed, although there is likely to be an opportunity to retain grassland/provide mitigation within a 50 m buffer of the LWS (to be determined by further survey). • The ecology buffer should be free from development and also have restricted or managed public access, with no public access to the designated sites (i.e. no footpaths or cycle paths to the woodland or pool). • Further surveys to inform detailed design (for example great crested newts (of which there are records within 1 km), bats roosts in buildings/trees, breeding birds, otter & water vole) could identify further mitigation requirements; however, it is likely that these could be incorporated into the ecology buffer of the LWS/ancient woodland. *Main opportunities:* • The southern part of the site is a pinch-point in an otherwise green corridor, most of which is designated as a Local Wildlife Site. Restoration of the woodland that was lost to the caravan area, and extension towards Captain's Pool with new planting/habitat creation in the buffers and along the brook, would provide biodiversity enhancements, strengthen the link between Local Wildlife Site areas and contribute to GI targets for the district. • If the cypress hedges are not found to be of high importance for bats, replacing them with native tree planting across the site would be an improvement for biodiversity. • There may be opportunities for SUDs scheme to deliver biodiversity benefits. • Habitat creation in GI (including buffers) could also deliver			

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							biodiversity benefits. 3.3 With the maximum ecology buffer of 50 m from the LWS and Ancient Woodland, this leaves approximately 2.6 ha (excluding The Lodge) as 'developable area' purely considering currently known ecological constraints. It may well be possible to increase this area if we can negotiate a reduced ecology buffer with the LPA following further ecology & hydrology survey and consideration of all the possible impacts to produce a sensitive development design. **POTENTIAL FOR DEVELOPMENT** 4.1 The ECOP shows the maximum buffers that would be required until detailed survey work can be carried out which may well indicate that these buffer areas could be reduced. In other words, this plan takes a precautionary approach regarding the amount and location of land available for development. 4.2 Plan 8797-102 Proposed Developable Area (attached as **Appendix 3** to these submissions) shows that 2.6ha of land could be developed to meet housing needs, using the maximum buffer areas to protect ecological constraints. Of this 2.6ha development land, 2.1ha is brownfield. 4.3 The property known as the Lodge has been excluded from the plans attached to this submission. The availability of this site for development is uncertain. 4.4 As can be seen from the proposed developable area plan, there are many advantages to allocating this site for development. Development of this site would enable a comprehensive management plan to be prepared and maintained for the land between the development site and Captain's Pool: this land includes an existing woodland TPO, a Local Wildlife Site and an area of Ancient Woodland. The existing incursion of a substantial area of hardstanding into the more sensitive areas of the site would be removed and the land restored to provide greater ecological and biodiversity value. The historic boathouse in the SW corner of the site, which has been identified as an undesignated heritage asset, could be protected within the proposed buffer zone. Whilst public access would need to be controlled to protect the ecological and biodiversity value of the land and the areas of water, there is no reason why the land management plan for the site could not allow some public access into some parts of the land. Without development, the cost of			

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							providing, maintaining and managing these areas for the benefit of the local community cannot be covered and these benefits will not be realised. <u>Sustainability appraisal of the pre-submission publication draft (October 2018)</u> 4.5 On the basis of the new ecological information now received, it is clear that the site should not be scored "major negative" for **biodiversity and geodiversity**. It should in fact be scored "major positive compared to the current situation – development would resolve an existing sustainability problem". 4.6 With regards to **soil and land**, whilst some of the site is greenfield, from the preliminary ecological survey it seems unlikely that the grassland will be of high quality. The land is not being used for any active agricultural use, it is simply mown and maintained. This should not be scored "minor negative" and should be scored neutral. 4.7 Looking at the **water resources and quality, flood risk** objective, the revised proposals for the site, based upon the evidence from Swift Ecology, would leave areas of the site at risk of surface water flooding within the undeveloped parts of the site. Water here would be managed in accordance with more detailed surveys and ecological management proposals that would follow at a more detailed stage of the development process. The water cycle study flags up capacity issues but this is not unusual for many development sites and is not a reason to preclude development of this land. 4.8 Turning **to landscape and townscape**, the notes recognise that the site is well screened from the A448 and considers that there is potential for adverse impact on views from the adjoining housing estate. There would be no adverse impact on these views. The boundary between these houses and this site is heavily screened year- round by Leyland Cypress that have grown to a height greater than the houses. There are, at most, limited views into this site and, if there are views, these are currently harmed by the substantial areas of hard standing, the uncompleted extension works to the property at Captains as well as the storage of much domestic paraphernalia and ancillary buildings, and the storage of caravans. There is potential therefore to improve the outlook for any properties that can obtain views into this site through the removal of the existing buildings, caravans and clutter, their replacement with an attractive housing scheme and through the			

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							restoration and improvement of the woodland and wildlife areas beyond. This score should therefore be amended from "minor negative" to "major positive compared to the current situation – development would resolve an existing sustainability problem", now that the Swift Ecology report has demonstrated that development on this site is realistic, subject to standard surveys being carried out. **THE TESTS OF SOUNDNESS** <u>Inclusion within Kidderminster East Policy 32</u> 5.1 Paragraph 35 of the Framework 2018 requires, amongst other things, that a plan be "justified": that there is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. The plan should also be "consistent with national policy": enabling the delivery of sustainable development in accordance with policies in the Framework. 5.2 In light of the ecological assessment carried out by Swift Ecology, site WFR/ST/1 has been wrongly assessed and should not be excluded from the core housing sites identified by the Council. The objection raised by the Council which has led to this site's exclusion from the pre-submission publication draft document has been overcome by the evidence provided by Swift Ecology. In other words, the site is not constrained in the manner concluded by the Council. Based upon the evidence now available to the Council, exclusion of this site would not be justified and fails to meet the guidance in paragraph 35 of the Framework 2018. In this regard the proposed plan is unsound. 5.3 With regards to the removal of the land from the Green Belt, this site meets the considerations set out in paragraph 138 of the Framework. The evidence provided by Swift Ecology demonstrates that "the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt" (para.138). 5.4 The pre-submission publication draft includes a summary of preferred options responses (pp.29-30). These responses included support for re-utilisation of brownfield land and support for concentrating development in and around the main settlements. There was concern for loss of agricultural land and wildlife.			

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							5.5 In light of the evidence from Swift Ecology, concerns regarding impact upon wildlife and valuable agricultural land can be allayed. The amount of land proposed for development (2.6ha) is only slightly more than the existing area of brownfield land (2.1ha) and so development of this site, which is next to the main settlement in the District, would meet a key local objective to minimise development of greenfield sites. In light of the evidence from Swift Ecology, this site should be developed in preference to any greenfield sites within the Green Belt. 5.6 Whilst Council officers' comments have suggested that limited development may still be possible based on existing footprint of development, it would be better to allocate the site to make a more efficient use of land and to enable the "trade" of brownfield land within the site for greenfield land within the site for the best outcomes in landscape/townscape and in ecology and biodiversity impacts. <u>Reserved Housing Sites</u> 5.7 This site should be included in the list of reserved housing sites to meet longer term needs, ahead of the sites identified. Paragraph 7.5 (p.50-51 of the pre-submission publication draft) confirms that the ADR (area of development restraint) sites safeguarded in Policy 7B are all greenfield sites (land removed from the Green Belt to meet longer-term needs). In looking to identify sites, the accepted hierarchy is: • Brownfield sites within urban areas • Greenfield sites within urban areas • Brownfield sites within the Green Belt • Greenfield sites within the Green Belt 5.8 This is confirmed by paragraph 6.16 of the pre-submission publication draft which advises that the urban areas of the District have the greatest housing needs and are locations where the cost of public service delivery is relatively low. "Accordingly, the bulk of development needs that cannot be met via brownfield land (including brownfield land in the Green Belt) will be via greenfield land release adjacent to the main towns, especially Kidderminster". 5.9 In light of the evidence from Swift Ecology, that ecological and biodiversity matters do not preclude development of this site, site WFR/ST/1 should be included in the list of reserved housing sites, as a brownfield site in the Green Belt, with no known constraints			

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							to development ahead of the inclusion of any greenfield sites in the Green Belt. The exclusion of this site is neither justified nor is it consistent with national policy and therefore fails to meet paragraphs 35 and 139 of the Framework 2018 and the plan, in this regard, is unsound. **CONCLUSIONS** 6.1 The site was included as a core housing site, with the potential to enhance the landscape by developing land that currently has a minor negative impact within the Green Belt, in the Council's preferred options document. 6.2 The Council's PEA resulted in the Council removing this site from the pre-submission publication draft. 6.3 The new evidence provided by Swift Ecology shows that the Council's position is not justified and, in this regard, the plan is therefore not sound. 6.4 The site should be included within the final version of the pre-submission document sent to the Planning Inspectorate as a site that should be developed for housing. If it is not to be included as land that is deliverable now then it should be removed from the Green Belt and included as a site within the reserved housing sites list, ahead of any greenfield sites.			
Taylor Wimpey West Midlands	LPPS996	Policy 6A		No		Positively Prepared Effective	Land at Comberton Road Kidderminster *Market Housing* The Council has prepared a range of technical evidence to inform the preparation of the new Local Plan. To determine the housing requirements for Wyre Forest, the local planning authority has commissioned consultants to identify the appropriate housing need taking into consideration relevant factors identified in the NPPF and Planning Practice Guidance. The Council's Housing Needs Study (HNS 2018) has regard to the Government's standard method for calculating housing need and identifies a minimum 276 dwellings per year utilising the most up-to-date sub-national household projections (2016 SNHP). It is noted that the HNS 2018 considers further scenario analysis to verify whether the figure provided by the Government's standard method is appropriate to Wyre Forest. This approach is supported by Taylor Wimpey as the PPG 2018 states that the standard method *"does not attempt to predict the impact that future government policies, changing economic*	The MHCLG derived figure of 276 dpa relates to 'household' change and does not factor in an allowance for vacant properties to derive 'dwelling' change within the District. Converting 'household' change to 'dwelling' change would result in a housing need of 286 dpa. This is supported as a robust figure and would assist in supporting economic growth aspirations within the District. The 29ha employment land requirement does not appear to take into account what could be needed in the event of Wyre Forest seeing stronger economic growth linked to the aspirations of	Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY

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							circumstances or other factors might have on demographic behaviour. Therefore there will be circumstances where actual housing need may be higher that the figure identified by the standard method." The Demographic Update paper (October 2018), which considers a number of economic and demographic scenarios, recognises through the demographic scenarios that the MHCLG derived figure of 276 dpa relates to 'household' change and does not factor in an allowance for vacant properties to derive 'dwelling' change within the District. Converting 'household' change to 'dwelling' change would result in a housing need of 286 dpa. This is supported as a robust figure and would assist in supporting economic growth aspirations within the District. Concern is also raised in respect of the employment-led scenarios in that they do not appear to reflect the economic growth aspirations of the area. Wyre Forest District Council is within the Greater Birmingham & Solihull and Worcestershire Local Enterprise Partnership areas. It is important that the level of housing provision proposed is consistent with the aspirations of the LEPs. Having reviewed the evidence, it appears that such economic aspirations have not been tested and it is unclear whether the level of dwelling provision is appropriate to meet those needs. It is suggested that further work is commissioned to test whether the dwelling requirement is fit for purpose and is joined up with other strategies and plans to achieve wider strategic aspirations. It is noted that the MHCLG has recently consulted on a number of changes to the standard method, including an approach to reverting to the 2014 SNHP in determining housing need. If the Wyre Forest District local housing need figure is re-calculated using the 2014 based household projections (2014 SNHP) and 2017 affordability ratio the resultant figure is 4,920 dwellings (246 dwellings per annum). However, this lower figure would undermine the ability for economic aspirations to be met, reduce the ability for affordable housing needs to be met and would again not take account of vacant properties within the District. *Affordable Housing* The Council's Housing Needs Study 2018 has identified a significant affordable housing need of 158 dwellings per annum in the District representing 57% of the promoted local housing need. It is noted that in Wyre Forest median house prices have increased from £69,000 in 2000 to £174,000 in 2017. In 2017 the median house price to median earnings ratio was 7.79 meaning that it is unaffordable for many local people to buy or rent in the	the Local Enterprise Partnerships in which the District lies. Consideration should therefore be given to increasing the quantum of employment land brought forward by the Local Plan. If employment growth is increased, the level of housing need should be reconsidered accordingly to ensure a jobs balance ratio that ensures a level of self-sufficiency and sustainability.		

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY

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							District. The delivery of affordable housing is an important consideration in determining the Council's housing requirement figure. The scale of affordable housing required in Wyre Forest therefore places further importance on retaining a higher housing requirement to ensure these needs can be met. *C2/ Institutional/ Care Home* A separate figure of 487 bed spaces for C2 use (Institutional/Care Home bedspaces) is supported and will assist to ensure the specific needs of the population are met. The principle of separating the C2 use requirement from the C3 requirement is supported, however on this basis any consideration of the housing land supply position contained within the housing trajectory should also exclude the C2 use provision. *Employment Land* The Local Plan gives a figure of 29ha of employment land that will be brought forward in the period up to 2036. This requirement is informed largely by the October 2018 Employment Land Study Update (ELS) undertaken by Lichfields, which correctly notes that the Wyre Forest District economy has seen historic sharp job decline since 1997. In addition, the Experian econometric job growth projections appear unduly pessimistic, projecting just a 2.8% growth in jobs between 2016 and 2036. This has informed the proposed 29ha employment land requirement set out within the Local Plan and appears to reflect past trends. However, a concern with the 29ha employment land requirement is that it does not appear to take into account what could be needed in the event of Wyre Forest seeing stronger economic growth linked to the aspirations of the Local Enterprise Partnerships in which the District lies. For example, the Worcestershire Local Enterprise Partnership's Strategic Economic Plan has a vision to grow the LEP economy by 25,000 jobs by 2025 and to support growth sectors such as advanced manufacturing. It is unlikely that Wyre Forest District will make much of a contribution to this target if its economy only grows under baseline conditions. Consideration should therefore be given to increasing the quantum of employment land brought forward by the Local Plan. If employment growth is increased, the level of housing need should be reconsidered accordingly to ensure a jobs balance ratio that ensures a level of self-sufficiency and sustainability.			
Taylor Wimpey West Midlands	LPPS704	Policy 6A		No		Positively Prepared	Land at Bewdley Road North Stourport		Yes	Taylor Wimpey considers it necessary to participate in

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						Effective	*Market Housing* The Council has prepared a range of technical evidence to inform the preparation of the new Local Plan. To determine the housing requirements for Wyre Forest, the local planning authority has commissioned consultants to identify the appropriate housing need taking into consideration relevant factors identified in the NPPF and Planning Practice Guidance. The Council's Housing Needs Study (HNS 2018) has regard to the Government's standard method for calculating housing need and identifies a minimum 276 dwellings per year utilising the most up-to-date sub-national household projections (2016 SNHP). It is noted that the HNS 2018 considers further scenario analysis to verify whether the figure provided by the Government's standard method is appropriate to Wyre Forest. This approach is supported by Taylor Wimpey as the PPG 2018 states that the standard method *"does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore there will be circumstances where actual housing need may be higher that the figure identified by the standard method."* The Demographic Update paper (October 2018), which considers a number of economic and demographic scenarios, recognises through the demographic scenarios that the MHCLG derived figure of 276 dpa relates to 'household' change and does not factor in an allowance for vacant properties to derive 'dwelling' change within the District. Converting 'household' change to 'dwelling' change would result in a housing need of 286 dpa. This is supported as a robust figure and would assist in supporting economic growth aspirations within the District. Concern is also raised in respect of the employment-led scenarios in that they do not appear to reflect the economic growth aspirations of the area. Wyre Forest District Council is within the Greater Birmingham & Solihull and Worcestershire Local Enterprise Partnership areas. It is important that the level of housing provision proposed is consistent with the aspirations of the LEPs. Having reviewed the evidence, it appears that such economic aspirations have not been tested and it is unclear whether the level of dwelling provision is appropriate to meet those needs. It is suggested that further work is commissioned to test whether the dwelling requirement is fit for purpose and is joined up with other strategies and plans to achieve wider strategic aspirations. It is noted that the MHCLG has recently consulted on a number of changes to the standard method, including an approach to			the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

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							reverting to the 2014 SNHP in determining housing need. If the Wyre Forest District local housing need figure is re-calculated using the 2014 based household projections (2014 SNHP) and 2017 affordability ratio the resultant figure is 4,920 dwellings (246 dwellings per annum). However, this lower figure would undermine the ability for economic aspirations to be met, reduce the ability for affordable housing needs to be met and would again not take account of vacant properties within the District. *Affordable Housing* The Council's Housing Needs Study 2018 has identified a significant affordable housing need of 158 dwellings per annum in the District representing 57% of the promoted local housing need. It is noted that in Wyre Forest median house prices have increased from £69,000 in 2000 to £174,000 in 2017. In 2017 the median house price to median earnings ratio was 7.79 meaning that it is unaffordable for many local people to buy or rent in the District. The delivery of affordable housing is an important consideration in determining the Council's housing requirement figure. The scale of affordable housing required in Wyre Forest therefore places further importance on retaining a higher housing requirement to ensure these needs can be met. *C2/ Institutional/ Care Home* A separate figure of 487 bed spaces for C2 use (Institutional/Care Home bedspaces) is supported and will assist to ensure the specific needs of the population are met. The principle of separating the C2 use requirement from the C3 requirement is supported, however on this basis any consideration of the housing land supply position contained within the housing trajectory should also exclude the C2 use provision. *Employment Land* The Local Plan gives a figure of 29ha of employment land that will be brought forward in the period up to 2036. This requirement is informed largely by the October 2018 Employment Land Study Update (ELS) undertaken by Lichfields, which correctly notes that the Wyre Forest District economy has seen historic sharp job decline since 1997. In addition, the Experian econometric job growth projections appear unduly pessimistic, projecting just a 2.8% growth in jobs between 2016 and 2036. This has informed the proposed 29ha employment land requirement set out within the Local Plan and appears to reflect past trends. However, a concern with the 29ha employment land requirement is that it does not appear to take into account what could be needed in the event of Wyre Forest			

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							seeing stronger economic growth linked to the aspirations of the Local Enterprise Partnerships in which the District lies. For example, the Worcestershire Local Enterprise Partnership's Strategic Economic Plan has a vision to grow the LEP economy by 25,000 jobs by 2025 and to support growth sectors such as advanced manufacturing. It is unlikely that Wyre Forest District will make much of a contribution to this target if its economy only grows under baseline conditions. Consideration should therefore be given to increasing the quantum of employment land brought forward by the Local Plan. If employment growth is increased, the level of housing need should be reconsidered accordingly to ensure a jobs balance ratio that ensures a level of self-sufficiency and sustainability			
Barratt Homes West Midlands	LPPS761	Policy 6A	Yes	No	Yes	Positively Prepared Effective	Amend policy 6A to specify that annual housing requirement figure is the minimum target.	The housing requirement in the emerging plan is a key issue. It is imperative that the plan provides for a sufficient quantum of housing to meet growth requirements. It is necessary for HLPC to attend the examination, to review this key issue.	Yes	
Persimmon Homes Limited	LPPS817	Policy 6A	Yes	No	Yes	Positively Prepared Justified Effective	Table 6.0.1 of Policy 6A identifies the amount of development this is required over the plan period 2016-2036 as being 5,520 dwellings, that equates to 276 dwellings per annum (dpa). This figure is derived from the conclusions of the Housing Need Study (HNS) 2018. The annual figure of 276 dpa has reduced from the figure of 300 dpa set out within the Preferred Options Document (June 2017). The figure of 300 dpa was taken from the conclusions of the Wyre Forest District OAHN (April 2017), however it is acknowledged that this was prepared in advance of the publication of the July 2018 NPPF, which introduces the Standard Methodology for assessing local housing need. As the Plan will be submitted beyond the deadline for transitional arrangements as part of Paragraph 214, it is expected that the 'local housing need' will be informed by the Standard Method, unless exceptional circumstances justify an alternative approach. The current figure of 276dpa is, as stated in Para 6.5 of the Plan, based on the 2016 based Sub-National Population Projections from the Office for National Statistics (ONS). The Inspector will be aware that following the publication of the 2016 ONS projections concerns were raised that this would result in significantly fewer new homes being constructed when compared against the	It is anticipated that Policy 6A, along with the supporting technical evidence base, will be updated in advance of the Plan being submitted, following the publication of the Government's amended approach to calculating housing need. The Council should look to adopt a flexible approach going into Examination. On this basis, it should be made clearer that Policy 6A should be a minimum figure, in line with the 2018 NPPF. It is also noted that the Council previously included a figure of 300dpa, which was considered to be achievable. The Council could revert to this higher figure, which would allow for a measure of flexibility, should the overall need for Wyre Forest increase in the future.	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity, as the agent for the proposed allocation, to discuss these as part of the Examination.

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							Government's often repeated aspiration of 300,000 homes per year. As a result of the likely consequences of the 2016 ONS projections the Government published a Technical Consultation on changes to national planning policy and guidance which ran between 26 October 2018 to 07 December 2018. That document states that the Government considers that for the short-term, the 2014 based data should be used as the demographic baseline for the assessment of housing need, and that in the longer term the standard methodology formula will be reviewed to establish a new method that meets the aspiration of providing 300,000 homes per year. It is clear that the Government remains committed to boosting the supply of housing and warns against relying on data that does not achieve this objective. Picture 1.1 of the Plan shows that it is the Council's intention to submit the plan for Examination in August 2019. The consultation on the Government's Technical Consultation closed on 7 December 2018, and it is anticipated that the new approach to the calculation of housing need will be published well before the submission of the Plan so that the level of housing need for Wyre Forest can be accurately calculated. In addition to this, it is also noted that this approach reflects a short-term position, to allow plans to proceed with a reasonable starting point for the calculation of housing need. What is also planned in the future is a rethink about how the calculation should look, and the Government has indicated that this will occur before the next (2018-based) projections are published in the summer/autumn of 2020. The Council therefore needs to assure themselves that the number that is currently presented is robust, and is capable of enduring future changes in methodology, which may be in place before/during the Examination of the Plan.			
Gladman Developments Ltd	LPPS856	Policy 6A	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The above policy identifies a net additional need of 5,520 dwellings over the period 2016-2036. As set out in the Revised Framework, the determination of a housing target should be informed by a local housing needs assessment utilising the standard method. It is important to note that the standard method is only intended to identify the baseline requirement and that actual housing need is not under-estimated as consideration should be given to the economic growth, affordable housing delivery and the unmet needs of neighbouring authorities should be considered in identifying the housing target contained in the Local Plan. The Council's Housing Needs Study (October 2018) identifies an		Yes	To discuss the issues raised in our written representations

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							affordable housing need of 158 dwellings per annum representing a total 57% of the identified local housing need. Given that the affordable housing need is a significant percentage of the total quantum of housing proposed, Gladman consider that an increase in the total housing figures should be included in the plan to ensure that the required number of affordable homes are delivered as a proportion of mixed market led development as advised by the PPG (Paragraph: 027 Reference ID: 2a-027-20180913). Gladman raise concerns in relation to the reference made whereby any unmet hGladman raise concerns in relation to the reference made whereby any unmet housing needs identified in neighbouring authorities will only be considered through a future review of the WFLP. This is not considered appropriate or positively prepared. The Revised Framework makes clear that Local Plans should be positively prepared and based on a strategy which as a minimum meets its own local housing needs in full and is informed by agreements with surrounding neighbouring authorities so that unmet housing needs from neighbouring authorities is accommodated. To ensure unmet housing need is addressed, the Council should be engaging with its neighbouring authorities now and evidence of these discussions set out in a Statement of Common Ground (SoCG) signed by all neighbouring authorities involved in accordance with the requirements of the Revised Framework (Paragraphs 24, 26 and 27) Failure to do so may result in a breach of legal compliance. It is noted that at present there is no DtC statement included on the Council website to support the consultation of the Draft Plan for Submission. The Local Plan recognises that it is considered to be a single HMA, yet that it should be assisting neighbouring authorities will only be considered following a review of the Local Plan. At this stage, there is no documentary evidence available to confirm how the Council has fulfilled the DtC. Gladman would therefore highlight that until sufficient evidence is provided, it remains uncertain as to whether the Plan has fulfilled this legal requirement and whether its strategy fully considers and reflects the needs of the wider area. Gladman reserve the right to comment on this position at a later date if further evidence is made available.			
Barberry Hurcott Limited	LPPS923	Vision and Objectives	No	No	No	Positively Prepared Justified Effective	The council has clearly sought for the minimum for housing and employment allocation for the plan period. The government standardised methodology using the 2016 projections should be treated with extreme caution. The district is a lower income area,	It is clear from the Council's own data that Wyre Forest District is an area that could be doing better. Net out- migration is heavily	Yes	Due to the complexities of the issues of concern to the promoter, and the nature and the extent of public

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						Consistent with National Policy	with clear evidence that people working outside the district are generally earning more.	influenced by the availability of better paid employment outside of the District. Skilled workers from the District are earning significantly more elsewhere. We consider the Council must to address this imbalance by being more proactive in delivering additional employment land, on top of redeveloping existing employment sites.		involvement in this site, it is considered that further verbal clarification and discussion at the EiP Hearings will be essential, and will further assist the inspector.
Hagley Parish Council	LPPS214	6B	Yes	No	Yes	Justified Effective Consistent with National Policy	This follows from our objection to Policy 6A. See also annex Hagley PC relationship to Birmingham and our objection to Policies 31 & 32. In adopting the enlarged Lea Castle site, WFDC has failed adequately to consider its landscape impact. We do not object to the removal of the former Hospital site from the Green Belt, but the woods and screening belts around the Hospital should be retained within the Green Belt, since it is policy that these should be retained as woodland.	Delete Lea Castle, or redefine it to limit the term to the brownfield former hospital site.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Campaign to Protect Rural England	LPPS296	Policy 6B.C	No	No		Positively Prepared Effective Consistent with National Policy	Experience in Bromsgrove District has shown that it is very difficult positively to prepare a Neighbourhood Plan, making positive proposal for development, unless there is a clear development target set at a strategic level by the LPA. Without this, a Neighbourhood Plan will barely be worth the paper it is written on: see L. Burns and A. Yuill, Where Next for Neighbourhood Plans? Can they withstand external pressures (National Association of Local Councils, 2018). https://www.nalc.gov.uk/library/publications/2755-where-next-for-neighbourhood-planning-2018/file	Development targets should be provided in the Plan for each settlement	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Campaign to Protect Rural England	LPPS304	6B.D	No	No	Yes	Positively Prepared Effective Consistent with National Policy	While we support the principle of 6D.D, "open countryside" is an unsatisfactory term, because not all countryside is necessarily open. The present status of Lea Castle Hospital is a brownfield site in the Green Belt, but it is enclosed by belts of trees and is thus not open countryside: it is in fact heavily enclosed countryside . The particular case will cease to be a problem with the adoption of the plan, but other cases may arise. At present the policy conflates the desire of WFDC to confine development to existing (and new) settlements with its duty under NPPF paragraph 170 to protect the beauty of the countryside. Both are laudable objectives, but they are not identical.	In Policy 6D.D find a different term to replace "open countryside". "Land beyond settlement boundaries" would be sufficient	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Taylor Wimpey West Midlands	LPPS727	Policy 6B		Yes			Land at Bewdley Road North Stourport		Yes	Taylor Wimpey considers it necessary to participate in

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							Policy 6B establishes the Development Strategy, including a number of guiding principles and a settlement hierarchy to inform the spatial distribution of growth. Taylor Wimpey considers the principles, upon which the Development Strategy is based, to be sound. The principles align to the delivery of the overarching Vision and the Plan's Aim and Objectives, ensuring the delivery of homes, jobs and focusing development to the most accessible locations whilst having regard to the provision of infrastructure. Stourport-on-Severn is identified as a 'Large Market Town' within the District. As the second order settlement within the District, its role in supporting the provision of larger scale housing and employment development is supported.			the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Euro Property Investments Ltd.	LPPS793	Policy 6B	Yes	Yes	Yes		We are generally supportive of the Council's proposed development strategy and agree with the proposed settlement hierarchy that is identified in Table 6.0.3. Specifically, we welcome the identification of Bewdley as a Market Town as the third tier of the hierarchy. Furthermore, we welcome the inclusion of housing to meet local needs as development that is considered suitable for the settlement.	None	Yes	We are promoting one of the four draft residential allocations in Bewdley and therefore key to the delivery of new housing in the settlement
Richborough Estates	LPPS818	Policy 6B-Locating New Development		Yes			Policy 6B is sound, is the most appropriate policy and accords with national policy.		yes	We would welcome the opportunity to attend the examination hearing sessions to discuss the issues we have identified which affect the soundness of the plan, and to meet with the Council to discuss the above evidence base when it is further evolved.
Gladman Developments Ltd	LPPS858	Policy 6B	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Gladman raise concerns with principle iv which seeks to 'safeguard and (wherever possible)enhance the open countryside'. It also states that the open countryside is defined as land beyond any development boundary, and that any development will be strictly controlled and limited to dwellings for rural workers, replacement dwellings and rural exception sites. This policy is not considered to be positively prepared as it is more akin to the outdated national policy approach contained in PPS7 to protect the countryside for its own sake. Local policies should recognise that sustainable development opportunities exist beyond the built limits of sustainable settlements and that such proposals have the ability to be brought forward for development		Yes	To discuss the issues raised in our written representations

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							when the need arises in a manner that respects the character of the countryside that is advocated by the NPPF. Indeed, Gladman note that principle vi goes on to state 'focus most development in and adjacent to the urban areas, where both housing needs and accessibility to more effective public service provision are greatest' (emphasis added). The policy therefore recognises that sustainable development can be brought forward adjacent to urban areas, and should be extended and reflected in the policy wording regarding development in market towns and rural areas.			
Taylor Wimpey West Midlands	LPPS997	Policy 6B		Yes			Comberton Road Kidderminster Policy 6B establishes the Development Strategy, including a number of guiding principles and a settlement hierarchy to inform the spatial distribution of growth. Taylor Wimpey considers the principles, upon which the Development Strategy is based, to be sound. The principles align to the delivery of the overarching Vision and the Plan's Aim and Objectives, ensuring the delivery of homes, jobs and focusing development to the most accessible locations whilst having regard to the provision of infrastructure. Kidderminster is identified as the 'Main Town' within the District. As the highest order settlement within the District, its role as the administrative centre of the District and focus for public services and employment is supported.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Homes England	LPPS94	Policy 6B	Yes	Yes	Yes		Homes England supports the broad principles of this policy and welcomes the inclusion of the new village at Lea Castle in the settlement hierarchy. The mix of land uses proposed at Lea Castle including a local centre, primary school, sports and employment uses means that it will be a sustainable settlement with a focus on self sufficiency for the day to day requirements of new residents. Creation of a new village at Lea Castle also ensures that the brownfield land at the core of the site can be effectively re-used, bringing a derelict site into re-use along with some of the surrounding land, all of which falls within the clear boundary to the new settlement provided by the existing road network.		Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Hagley Parish Council	LPPS221	6B	Yes	No	Yes		6B.C is contrary to the Neighbourhood Planning Act, which only requires Neighbourhood Plans to conform to the Strategic Policies of the LPA's Plan. 6B.D conflates land beyond settlement boundaries with open countryside. These are related concepts, but are not identical.	Both policies need to be amended.	Yes	To amplify as necessary this objection and natural justice, ensuring that the inspector hears both sides of the argument.

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Campaign to Protect Rural England	LPPS300	Policy 6B B	No	No		Justified	see detailed reasons given under objection by CPRE to 6.10. We see no objection to the exclusion of the former hospital site itself from the Green Belt, but Lea Castle East, West and North should remain Green Belt. Inadequate consideration has been given to WFDC's duty under NPPF paragraph 170 to protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside	Delete Lea Castle East, West and North	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Campaign to Protect Rural England	LPPS316	Policy 6B.E	No	No	Yes	Justified Consistent with National Policy	We object to the extent of the Green Belt as shown on the Policies map. Land is being taken out of the Green Belt that does not need to be developed and should not be. The details of our views on this are set out in other objections. We are annexing a critique of the results of the Green Belt Assessment. There is no objection to the wording of the policy, only to the Map that it incorporates	Amend policies map to reinstate more land as Green Belt	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Barratt Homes West Midlands	LPPS760	Policy 6B- Locating new development	Yes	No	Yes	Positively Prepared Justified	Criteria three of policy 6B should amended accordingly or additional criteria added to reflect paragraph 118 (d) of the NPPF.	Criteria A.iii should be amended, or a new criteria added, to reflect the requirements of paragraph 118.D of the Framework. It should be confirmed that the development strategy seeks to promote and support the development of underused land and buildings to help meet housing requirements and this approach is applicable to both brownfield and greenfield land.	Yes	
Persimmon Homes Limited	LPPS815	Policy 6B	Yes	No	Yes	Justified Effective	• Policy 6B, A, ii. States that the Plan will provide for and facilitate the delivery of sufficient accessible housing to meet objectively assessed needs to 2036. RPS representation, on behalf of Persimmon Homes, to Policy 6A, and in particular the level of housing need should be read alongside this representation. Paragraph 60 of the NPPF (2018) states that strategic policies should be informed by a local housing need assessment to determine the minimum number of homes required. The Policy as drafted could be interpreted as regarding the housing need as a maximum level of housing to be provided, rather than a minimum. This needs to be amended for consistency with the NPPF. RPS fully supports the Council's strategy at Bewdley, which is one of the main centres in the District and capable of supporting higher levels of housing growth. RPS considers that greater weight needs to be afforded to	It terms of being positively prepared Policy 6B, A, ii should be amended to read: Provide for and facilitate the delivery of sufficient accessible housing to meet as a minimum, the objectively assessed needs to 2036 For clarity, 6B (v) should also be amended to reflect the protection of the Green Belt having regard to sites proposed for release as part of the Local Plan. In terms of being positively	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity, as the agent for the proposed allocation, to discuss these as part of the Examination

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							Bewdley in this regard, and Table 6.0.3 could go further in recognising the role that the town can make as part of the Plan. Table 6.0.3 -Wyre Forest Settlement Hierarchy states that there are 'fewer services' within Bewdley, whereas Stourport-on-Severn is described as having a 'comprehensive range of local services'. The Council's Settlement Hierarchy Technical Paper (October 2018) includes an analysis of the individual settlements and that analysis, included within Appendix A of the Paper, shows that the range of services within Bewdley and Stourport-on-Severn are the same, albeit there are greater number of instances of each identified service within Stourport-on-Severn. The difference in scoring between the two Market Towns (Bewdley scored 29 and Stourport-on-Severn scored 31) is a result of more employment opportunities and a more frequent bus service in Stourport-on-Severn. The use of the term 'fewer services' downplays the range of services that are available within Bewdley and, as a result, the sustainability of Bewdley could be regarded as being reduced. The 'suitable development' column within Table 6.0.3 refers to 'Housing to meet local needs' in relation to Bewdley. Paragraph 85 of the NPPF (2018) states that: "Planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Planning policies should: a) define a network and hierarchy of town centre and promote their long-term vitality and viability – by allowing them to grow and diversify in a away that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters. By simply referring to housing to meet local needs as being 'suitable' within Bewdley the Policy ignores the role that housing can play, as recognised in NPPF Paragraph 85, in securing the long-term vitality and viability of Bewdley as a Market Town. The Council's Site Selection Paper (2018) states (Paragraph 7.9) that previous plans had severely limited development within Bewdley and it is likely that the repression of natural growth has impacted on the vitality and viability of the town. It is proposed that Policy 6B needs to be redrafted for Bewdley, to be more positively	prepared Table 6.0.3 of Policy 6B should be amended to be more positively prepared. It is proposed that for Bewdley, the table instead reads: Role - 1st bullet point - A comprehensive range of local services Suitable Development - 3rd bullet point - Housing to meet local needs and to ensure long-term vitality and viability		

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							prepared, in line with the Council's proposed growth for the town.			
Marmaris Investments Ltd.	LPPS841	Policy 6B	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	In other villages and rural settlements reference is made to meeting *"local needs via allocated sites…."* yet the housing strategy which sets out housing allocations does not allocate such land in Blakedown. This should be addressed by the allocation of the land at Station Drive. The supporting text is very clear that exceptional circumstances exist to review Green Belt boundaries within the District due to development needs and the inability to provide for that development without incursion into the Green Belt. The Green Belt review which underpins this part of the plan is a full review, not partial, yet the plan is selective in which findings are taken forward.	The land at Station Drive should be removed from the Green Belt and allocated.	Yes	Green Belt / Transportation / Housing issues are important areas of the plan and inclusion in the debate at the examination will be useful to the Inspector
Gillespie Gaynor	LPPS956	6B		No		Justified Consistent with National Policy	<u>Call for Sites and HELAA</u> 1.1 In 2015, the land at Captains, Bromsgrove Road, was submitted into the call for sites and representations were made into the issues and options consultation. The subsequent HELAA in 2016 included the site as being 1.23ha of brownfield land and 1.75ha of greenfield land (at this time the site was both Captains and the adjacent property the Lodge), with the total site capable of providing 135 dwellings (ref: WFR/ST/1). The HELAA commented that the brownfield elements of the site could deliver housing within 5 years, as this would not require land to be taken out of the Green Belt. The remainder of the site was considered potentially developable after 5 years, as this land would need to be released from the Green Belt. <u>Green Belt Review April 2017</u> 1.2 In April 2017, the Amec Foster Wheeler Green Belt Review concluded that "the site makes only a limited contribution to Green Belt purposes, being well bounded with limited visual connection". 1.3 With regards to the effect of development on openness, this Review concluded that "development would extend the current built edge of Kidderminster along the A448 but this would not be substantial and would be visually contained by substantial boundary vegetation". 1.4 In more detail, the Review concluded:	Site WFR/ST/1 should be included as a core housing site.	Yes	To update the inspector on further ecological and tree surveys carried of at the appropriate times of the year to inform how much of the site is available for development whilst protecting and improving biodiversity.

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							To check the unrestricted sprawl of large built-up areas: Limited contribution: development on this site would create a logical rounding off of the built edge of Kidderminster without creating sprawl along the A448 To prevent neighbouring towns merging into one another: Limited contribution: development would not contribute to coalescence To assist in safeguarding the countryside from encroachment: Limited contribution: the bounded character of the site means that development would not create a sense of encroachment into open countryside To preserve the setting and special character of historic towns: Limited contribution: the site has no role in this respect Overall assessment of contribution to Green Belt purposes: Limited contribution: The site makes only a limited contribution to Green Belt purposes, being well bounded with limited visual connection. Development would extend the current built edge of Kidderminster along the A448 but this would not be substantial and would be visually contained by substantial boundary vegetation (p.36 Appendix C Green Belt Review April 2017) 1.5 This assessment of the site was unaltered in the Green Belt Review Part II Site Analysis published in May 2018 <u>Preferred Options Sustainability Appraisal Report May 2017</u> 1.6 In Appendix G.4 Local Plan Review Site Testing Tables – Kidderminster East, this site WFR/ST/1 was identified as having "the potential to enhance the landscape by developing land that currently has a minor negative impact". The site was recognised as involving the redevelopment of a brownfield site and "thus development has the potential for a significant positive effect". 1.7 Of the 13 sustainability appraisal objectives used (two of which were divided into two scores within each objective), this site scored "major positive" (development would resolve an existing sustainability problem) in three of the objectives, "minor positive" (no sustainability constraints) in six of the categories, "neutral" in four of the objectives, N/A in one objective and a			

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							"minor negative" (potential sustainability issues, mitigation and/or negotiation possible) in the objective "to maintain the integrity of the Green Belt within the District". 1.8 This site did not score any "major negative" (problematic and improbable due to sustainability issues, mitigation is likely to be difficult and/or expensive) or any "absolute constraints". 1.9 Objective 9 considered the objective of conserving and enhancing the District's biodiversity and geodiversity and development of this site was considered "neutral" in its potential to adversely affect nationally protected sites and was considered "minor positive" in its potential to adversely affect locally protected sites. <u>Local Plan Review Preferred Options (June 2017)</u> 1.10 Consequently, in the preferred options publication June 2017, site WFR/ST/1 was the only potential site south of A448 Bromsgrove Road identified as a core housing site (i.e. a site common to both options A and B). Sites north of A448 Bromsgrove Road were also identified as core housing sites. Other sites south of Bromsgrove Road, surrounding this site WFR/ST/1 were included as option A housing sites only. In essence, option B sites were those identified as core housing sites and option A housing sites were proposed as additional to these option B core housing sites. The option A sites would require additional infrastructure. Clearly, WFR/ST/1 was seen as a site that could be brought forwards to meet housing needs without greater investment in infrastructure than required to meet the other core housing sites included in option B. <u>Preliminary Ecological Appraisal of potentially ecologically sensitive sites on WFDC's list of sites for allocation in the 2018 Local Plan (June 2018)</u> 1.11 The appraisal identified features of biodiversity significance that could affect development of this site: • Wet woodland adjoining the Captain's and Stanklyn Pools and Spennells Valley LWS. • Drain and associated vegetation • Tall hedgerows – although the Leyland cypress trees are of very low ecological value, they do form substantial corridors across the site, along which bats and birds might commute.			

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							Recommendations were therefore: • Buffer the wet woodland and Captain's Pool by at least 50m and design the site to draw footfall away from/prevent access to the sensitive LWS receptor • Ensure that surface water is appropriately managed away from the wet woodland • A management plan should be produced to eradicate non-native species from the site (see section 4.1.2), including the Leyland cypress trees – although bat surveys should be carried out first • Extensive bat presence/absence and activity surveys, covering buildings and the wider site should be carried out to find out how bats use it for commuting and foraging. This information should be used to inform site layout and mitigation and compensation measures for bats, including fulfilling the connectivity function (if any) of the Leyland cypress hedgerows. • Full botanical surveys of the grassland are recommended when it has not been recently mown, to check for plant species of interest (e.g. the S41 species recorded nearby by WBRC). <u>Sustainability appraisal of the Pre-Submission Publication Draft Wyre Forest District</u> <u>Local Plan published October 2018</u> 1.12 This site receives a "neutral" score for local services and facilities, need to travel and sustainable travel modes, economy and employment and for community and settlement identities. It scores "minor positive compared to the current situation – no sustainability constraints" for housing needs of all. For soil and land, water resources and quality, flood risk, landscape and townscape and for Green Belt, it scores a "minor negative compared to the current situation – potential sustainability issues, mitigation possible". For historic environment it scores "neutral uncertain" and for biodiversity and geodiversity it scores "major negative compared to the current situation – problematic sustainability issues, mitigation difficult and/or expensive". <u>Local Plan Review Preferred Options (June 2017) summary of consultation responses</u> <u>published October 2018</u> 1.13 The WFDC officer comments for this site read:			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY

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							"This site is not proposed for allocation in this local plan. Limited development may still be possible based on existing footprint of development. Key issue is impact on ancient woodland and pools and streams complex which would severely limit the developable area." (Appendix 3b Kidderminster Urban Extensions) **MERITS OF THIS SITE** 2.1 The site is in sole ownership and there are no known legal constraints to development of this site, which could be delivered within five years. There is the potential to provide a minimum of 70 dwellings on the site, subject to further ecological survey work being carried out, which may show that more land is available for development than can be confirmed at this time. Housing mix, including affordable housing, would be in accordance with current policies. The site has mains water and sewerage, electricity and gas, with good access onto the public highway A448 Bromsgrove Road. There are no known abnormal costs, other than a programme of works to provide ecological and biodiversity enhancement, and no known issues that would influence economic viability. There are no bad neighbour uses; the current low- key caravan storage use would cease. The site lies in a sustainable location, adjacent to the existing Spennells residential development. 2.2 Development of this site meets all of the relevant principles in proposed policy 6B Locating New Development, as it provides for accessible housing to meet objectively assessed needs, it makes effective re-use of accessible, available and environmentally acceptable brownfield land, it will safeguard and enhance the open countryside, it will have limited effect on the openness of the Green Belt and will be development adjacent to the urban area, where both housing needs and accessibility to more effective public service provision are greatest. 2.3 Until the publication of the Council's preliminary ecological appraisal (PEA) in June 2018, this site WFR/ST/1 was judged by the Council to be a good site for housing development. The Council has acknowledged that there will need to be Green Belt releases to meet projected housing needs and this site has been determined to make only a limited contribution to the purposes of land being included in the Green Belt. It was considered that development on this site would have limited effect on the openness of the Green Belt. 2.4 There is a local desire, expressed in the preferred options			

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							publication draft, that the number and scale of greenfield sites taken for development should be as small as possible. The major part of this site (2.1ha) is brownfield (see plan 8797-101 attached as **Appendix 1** to these submissions) and development on this site would thus meet this objective. 2.5 The Preferred Options Sustainability Appraisal recognised that there was potential to enhance the landscape by developing land that currently has a minor negative impact. **NEW EVIDENCE** 3.1 None of the recommendations in the Council's PEA prevent development of this site, they simply seek to protect and enhance the existing value of some parts of the site through measures to buffer the wet woodland and Captain's Pool by at least 50m, restrict public access, manage surface water appropriately, and carry out standard tree, protected species and botanical surveys to inform the site development 3.2 It is, unfortunately, the wrong time of year to carry out any detailed survey work of the site. Nonetheless, Swift Ecology were commissioned to provide an initial assessment of the relevant documents and a site visit was made in early December. Swift Ecology have since produced an ecological constraints and opportunities plan (ECOP attached as **Appendix 2** to these submissions). <u>Summary of Swift Ecology's initial comments:</u> *Main constraints:* • The WCC/Severnscape Preliminary Ecological Appraisal (2018) report recommends a minimum 50 m buffer of the designated Local Wildlife Site and ancient woodland. It may well be possible to reduce this buffer; this would need to be informed by further ecology surveys and information on the feasibility and effectiveness of mitigation for issues such as drainage, lighting, pollution and disturbance in order to demonstrate that the LWS will not be adversely impacted. At this stage we don't have enough evidence to specify and justify a smaller buffer, so the ECOP shows the full 50 m buffer to the LWS/ancient woodland. • Captain's Pool: recommend scrub planting in the buffer (whatever the size of the buffer) to limit public access to			

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							the pool and thereby protect wetland birds and their breeding/wintering habitats; drainage/pollution and lighting issues will also need consideration. • Ancient woodland: the buffer distance needs to be evidence-based (see guidance from The Woodland Trust). The key issues in determining the extent of the final buffer will be the ecological importance of the woodland and the site hydrology/drainage design. The ecological importance of the woodland can only be established through further survey (the optimal time for woodland botanical surveys is April-May). • Brook in southern part of the site. This will need buffering and could potentially be enhanced (see opportunities below). Minimum 5 m buffer along the banks based on EA guidance for minor watercourses has been included in the ECOP. • The mature cypress hedges provide a good network across the site and might be important for foraging/commuting bats. Further bat surveys would be needed to establish their importance. • The grassland across the site will need a more detailed survey in summer (May- July) to determine its importance. From the preliminary survey it seems unlikely that the grassland will be of high quality; however, if some or all of the grassland *is* identified as priority habitat, mitigation will be needed, although there is likely to be an opportunity to retain grassland/provide mitigation within a 50 m buffer of the LWS (to be determined by further survey). • The ecology buffer should be free from development and also have restricted or managed public access, with no public access to the designated sites (i.e. no footpaths or cycle paths to the woodland or pool). • Further surveys to inform detailed design (for example great crested newts (of which there are records within 1 km), bats roosts in buildings/trees, breeding birds, otter & water vole) could identify further mitigation requirements; however, it is likely that these could be incorporated into the ecology buffer of the LWS/ancient woodland. *Main opportunities:* • The southern part of the site is a pinch-point in an otherwise green corridor, most of which is designated as a Local Wildlife Site. Restoration of the woodland that was			

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							lost to the caravan area, and extension towards Captain's Pool with new planting/habitat creation in the buffers and along the brook, would provide biodiversity enhancements, strengthen the link between Local Wildlife Site areas and contribute to GI targets for the district. • If the cypress hedges are not found to be of high importance for bats, replacing them with native tree planting across the site would be an improvement for biodiversity. • There may be opportunities for SUDs scheme to deliver biodiversity benefits. • Habitat creation in GI (including buffers) could also deliver biodiversity benefits. 3.3 With the maximum ecology buffer of 50 m from the LWS and Ancient Woodland, this leaves approximately 2.6 ha (excluding The Lodge) as 'developable area' purely considering currently known ecological constraints. It may well be possible to increase this area if we can negotiate a reduced ecology buffer with the LPA following further ecology & hydrology survey and consideration of all the possible impacts to produce a sensitive development design. **POTENTIAL FOR DEVELOPMENT** 4.1 The ECOP shows the maximum buffers that would be required until detailed survey work can be carried out which may well indicate that these buffer areas could be reduced. In other words, this plan takes a precautionary approach regarding the amount and location of land available for development. 4.2 Plan 8797-102 Proposed Developable Area (attached as **Appendix 3** to these submissions) shows that 2.6ha of land could be developed to meet housing needs, using the maximum buffer areas to protect ecological constraints. Of this 2.6ha development land, 2.1ha is brownfield. 4.3 The property known as the Lodge has been excluded from the plans attached to this submission. The availability of this site for development is uncertain. 4.4 As can be seen from the proposed developable area plan, there are many advantages to allocating this site for development. Development of this site would enable a comprehensive management plan to be prepared and maintained for the land between the development site and Captain's Pool:			

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							this land includes an existing woodland TPO, a Local Wildlife Site and an area of Ancient Woodland. The existing incursion of a substantial area of hard standing into the more sensitive areas of the site would be removed and the land restored to provide greater ecological and biodiversity value. The historic boathouse in the SW corner of the site, which has been identified as an undesignated heritage asset, could be protected within the proposed buffer zone. Whilst public access would need to be controlled to protect the ecological and biodiversity value of the land and the areas of water, there is no reason why the land management plan for the site could not allow some public access into some parts of the land. Without development, the cost of providing, maintaining and managing these areas for the benefit of the local community cannot be covered and these benefits will not be realised. <u>Sustainability appraisal of the pre-submission publication draft (October 2018)</u> 4.5 On the basis of the new ecological information now received, it is clear that the site should not be scored “major negative” for **biodiversity and geodiversity**. It should in fact be scored “major positive compared to the current situation – development would resolve an existing sustainability problem”. 4.6 With regards to **soil and land**, whilst some of the site is greenfield, from the preliminary ecological survey it seems unlikely that the grassland will be of high quality. The land is not being used for any active agricultural use, it is simply mown and maintained. This should not be scored “minor negative” and should be scored neutral. 4.7 Looking at the **water resources and quality, flood risk** objective, the revised proposals for the site, based upon the evidence from Swift Ecology, would leave areas of the site at risk of surface water flooding within the undeveloped parts of the site. Water here would be managed in accordance with more detailed surveys and ecological management proposals that would follow at a more detailed stage of the development process. The water cycle study flags up capacity issues but this is not unusual for many development sites and is not a reason to preclude development of this land. 4.8 Turning **to landscape and townscape**, the notes recognise that the site is well screened from the A448 and considers that there is potential for adverse impact on views from the adjoining housing			

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							estate. There would be no adverse impact on these views. The boundary between these houses and this site is heavily screened year- round by Leyland Cypress that have grown to a height greater than the houses. There are, at most, limited views into this site and, if there are views, these are currently harmed by the substantial areas of hard standing, the uncompleted extension works to the property at Captains as well as the storage of much domestic paraphernalia and ancillary buildings, and the storage of caravans. There is potential therefore to improve the outlook for any properties that can obtain views into this site through the removal of the existing buildings, caravans and clutter, their replacement with an attractive housing scheme and through the restoration and improvement of the woodland and wildlife areas beyond. This score should therefore be amended from "minor negative" to "major positive compared to the current situation – development would resolve an existing sustainability problem", now that the Swift Ecology report has demonstrated that development on this site is realistic, subject to standard surveys being carried out. **THE TESTS OF SOUNDNESS** <u>Inclusion within Kidderminster East Policy 32</u> 5.1 Paragraph 35 of the Framework 2018 requires, amongst other things, that a plan be "justified": that there is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. The plan should also be "consistent with national policy": enabling the delivery of sustainable development in accordance with policies in the Framework. 5.2 In light of the ecological assessment carried out by Swift Ecology, site WFR/ST/1 has been wrongly assessed and should not be excluded from the core housing sites identified by the Council. The objection raised by the Council which has led to this site's exclusion from the pre-submission publication draft document has been overcome by the evidence provided by Swift Ecology. In other words, the site is not constrained in the manner concluded by the Council. Based upon the evidence now available to the Council, exclusion of this site would not be justified and fails to meet the guidance in paragraph 35 of the Framework 2018. In this regard the proposed plan is unsound. 5.3 With regards to the removal of the land from the Green Belt, this site meets the considerations set out in paragraph 138 of the			

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							Framework. The evidence provided by Swift Ecology demonstrates that "the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt" (para.138). 5.4 The pre-submission publication draft includes a summary of preferred options responses (pp.29-30). These responses included support for re-utilisation of brownfield land and support for concentrating development in and around the main settlements. There was concern for loss of agricultural land and wildlife. 5.5 In light of the evidence from Swift Ecology, concerns regarding impact upon wildlife and valuable agricultural land can be allayed. The amount of land proposed for development (2.6ha) is only slightly more than the existing area of brownfield land (2.1ha) and so development of this site, which is next to the main settlement in the District, would meet a key local objective to minimise development of greenfield sites. In light of the evidence from Swift Ecology, this site should be developed in preference to any greenfield sites within the Green Belt. 5.6 Whilst Council officers' comments have suggested that limited development may still be possible based on existing footprint of development, it would be better to allocate the site to make a more efficient use of land and to enable the "trade" of brownfield land within the site for greenfield land within the site for the best outcomes in landscape/townscape and in ecology and biodiversity impacts. <u>Reserved Housing Sites</u> 5.7 This site should be included in the list of reserved housing sites to meet longer term needs, ahead of the sites identified. Paragraph 7.5 (p.50-51 of the pre-submission publication draft) confirms that the ADR (area of development restraint) sites safeguarded in Policy 7B are all greenfield sites (land removed from the Green Belt to meet longer-term needs). In looking to identify sites, the accepted hierarchy is: • Brownfield sites within urban areas • Greenfield sites within urban areas • Brownfield sites within the Green Belt • Greenfield sites within the Green Belt 5.8 This is confirmed by paragraph 6.16 of the pre-submission			

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							publication draft which advises that the urban areas of the District have the greatest housing needs and are locations where the cost of public service delivery is relatively low. "Accordingly, the bulk of development needs that cannot be met via brownfield land (including brownfield land in the Green Belt) will be via greenfield land release adjacent to the main towns, especially Kidderminster". 5.9 In light of the evidence from Swift Ecology, that ecological and biodiversity matters do not preclude development of this site, site WFR/ST/1 should be included in the list of reserved housing sites, as a brownfield site in the Green Belt, with no known constraints to development ahead of the inclusion of any greenfield sites in the Green Belt. The exclusion of this site is neither justified nor is it consistent with national policy and therefore fails to meet paragraphs 35 and 139 of the Framework 2018 and the plan, in this regard, is unsound. **CONCLUSIONS** 6.1 The site was included as a core housing site, with the potential to enhance the landscape by developing land that currently has a minor negative impact within the Green Belt, in the Council's preferred options document. 6.2 The Council's PEA resulted in the Council removing this site from the pre-submission publication draft. 6.3 The new evidence provided by Swift Ecology shows that the Council's position is not justified and, in this regard, the plan is therefore not sound. 6.4 The site should be included within the final version of the pre-submission document sent to the Planning Inspectorate as a site that should be developed for housing. If it is not to be included as land that is deliverable now then it should be removed from the Green Belt and included as a site within the reserved housing sites list, ahead of any greenfield sites.			
Taylor Wimpey West Midlands	LPPS1016	Policy 6B		Yes			Land at Rectory Lane Stourport Policy 6B establishes the Development Strategy, including a number of guiding principles and a settlement hierarchy to inform the spatial distribution of growth. Taylor Wimpey considers the principles, upon which the Development Strategy is based, to be sound. The principles align		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of

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							to the delivery of the overarching Vision and the Plan's Aim and Objectives, ensuring the delivery of homes, jobs and focusing development to the most accessible locations whilst having regard to the provision of infrastructure. Stourport-on-Severn is identified as a 'Large Market Town' within the District. As the second order settlement within the District, its role in supporting the provision of larger scale housing and employment development is supported.			the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	LPPS998	Policy 6C		Yes			Comberton Road Kidderminster Kidderminster's role as the strategic centre of the District is supported. As the existing 'centre' for commercial, employment, retail, office and leisure facilities it is the most sustainable location for meeting future housing needs. The reference to sustainable strategic allocations for Kidderminster are welcomed and considered necessary to ensure the sustainable growth of the town and to support future commercial and leisure development to support Kidderminster's role as a strategic centre, promoting the town as a tourism 'hub' and assisting in the creation of a diverse evening/night time economy.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Gladman Developments Ltd	LPPS859	Policy 6C	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	In principle, Gladman support the broad intention for the district's main town to be a focus for future regeneration and new development opportunities. However, it is important that this should not threaten the ability of additional development opportunities from coming forward in other settlements over the plan period. It is vital that the Council is able to demonstrate a flexible and responsive supply of housing across its portfolio of previously developed sites and urban extensions and that they are suitably evidenced in order to demonstrate that they will deliver as expected. Gladman are promoting land at Wolverhampton Road, Kidderminster for residential-led development. The proposals offer an opportunity to release land from the Green Belt to ensure the delivery of sustainable and distinctive development in an attractive market location.		Yes	To discuss the issues raised in our written representations
Taylor Wimpey West Midlands	LPPS1017	Policy 6C		Yes			Land at Rectory Lane Stourport		Yes	Taylor Wimpey considers it necessary to participate in

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							Kidderminster's role as the strategic centre of the District is supported. As the existing 'centre' for commercial, employment, retail, office and leisure facilities it is the most sustainable location for meeting future housing needs. The reference to sustainable strategic allocations for Kidderminster are welcomed and considered necessary to ensure the sustainable growth of the town and to support future commercial and leisure development to support Kidderminster's role as a strategic centre, promoting the town as a tourism 'hub' and assisting in the creation of a diverse evening/night time economy.			the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	LPPS770	Policy 6C		Yes			Land at Bewdley Road North Stourport Kidderminster's role as the strategic centre of the District is supported. As the existing 'centre' for commercial, employment, retail, office and leisure facilities it is the most sustainable location for meeting future housing needs. The reference to sustainable strategic allocations for Kidderminster are welcomed and considered necessary to ensure the sustainable growth of the town and to support future commercial and leisure development to support Kidderminster's role as a strategic centre, promoting the town as a tourism 'hub' and assisting in the creation of a diverse evening/night time economy.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
West Midland Safari Park	LPPS918	6C	Yes	No	Yes	Consistent with National Policy	WMSP generally supports the general essence of this policy, particularly in relation to seeking sustainable transport links and infrastructure to promote ease of access to among other places, West Midland Safari Park. However, WMSP object to the policy as currently drafted, and request that it be amended to more closely reflect paragraph 108 of the National Planning Policy Framework. This states that: "In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that. .. any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable	The last sentence should therefore be amended as follows: "Where the residual cumulative impacts of development are severe, sustainable transport links and infrastructure to promote ease of access to the Wyre Forest, Stourport-on-Severn, Bewdley, West Midlands Safari Park and Kidderminster Railway Station will be sought, where practical and viable."	Yes	RPS would like to elaborate on why it is concerned the Policy as presently drafted gives the Council an opportunity to request off-site improvements and or contributions towards transport infrastructure, and how this is contrary to paragraph 108 of the National Planning Policy Framework which seeks to ensure that any significant

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							degree." The policy as presently drafted gives rise to the possibility that the transport links and infrastructure will be in part or wholly funded by developer contributions in the absence of a CIL charging schedule. Such an approach should be proportionate to the scale of the impact on the transport network, and the viability of the scheme for which contributions are sought should be a key consideration in the determination of planning applications.			impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
Taylor Wimpey West Midlands	LPPS1032	Policy 6D		Yes			Land at Bewdley Road North Stourport The identification of strategic allocations at Kidderminster is wholly supported by Taylor Wimpey in recognition of the insufficient amount of sustainably located, readily available land within the town, to support the necessary level of development growth to meet identified housing and employment needs. Taylor Wimpey has significant land interests within the proposed 'East of Kidderminster' Urban Extension and would welcome ongoing proactive discussions with the District Council in bringing forward these land interests within the Plan period. However, it should be noted that Taylor Wimpey have further land interests to the south of Comberton Road that do not form part of the strategic allocation, that would provide future growth opportunities within Kidderminster beyond the plan period.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	LPPS999	Policy 6D		Yes			Comberton Road Kidderminster The identification of strategic allocations at Kidderminster is wholly supported by Taylor Wimpey in recognition of the insufficient amount of sustainably located, readily available land within the town, to support the necessary level of development growth to meet identified housing and employment needs. Taylor Wimpey has significant land interests within the proposed 'East of Kidderminster' Urban Extension and would welcome ongoing proactive discussions with the District Council in bringing forward these land interests within the Plan period. However, it should be noted that Taylor Wimpey has further land interests to the south of Comberton Road that do not form part of the strategic allocation, that would provide future growth opportunities within Kidderminster beyond the plan period. Further planning consideration of the East of Kidderminster Urban Extension is set out in later representations.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Worcestershire Wildlife Trust	LPPS326	6D	Yes	Yes	Yes		The WWT note the substantive changes to this policy in regards to the revisions of the Kidderminster East site, in particular reducing the overall size of allocation and removal of the eastern relief road.			
Hagley Parish Council	LPPS227	6D	Yes	No	Yes	Justified Consistent with National Policy	This flows from our objection to the quantum of development. These sites are not needed or largely so. See also our objections "relationship to Birmingham" and to policies 31 and 32.	Delete Policy 6D.	Yes	To amplify as necessary this objection and natural justice, ensuring that the inspector hears both sides of the argument.
Homes England	LPPS95	Policy 6D	Yes	Yes	Yes		Homes England welcomes the identification of the Lea Castle Strategic Allocation Site in this policy. The Council's approach to identifying strategic sites alongside smaller sites to assist in meeting its housing need is a sensible approach as it enables strategic allocations to be of an appropriate size that it is viable for them to incorporate new community facilities and services alongside residential development, making them more sustainable, reducing pressure on existing facilities and on the transport network.		Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Taylor Wimpey West Midlands	LPPS1018	Policy 6D		Yes			Land at Rectory Lane Stourport The identification of strategic allocations at Kidderminster is wholly supported by Taylor Wimpey in recognition of the insufficient amount of sustainably located, readily available land within the town, to support the necessary level of development growth to meet identified housing and employment needs. Taylor Wimpey has significant land interests within the proposed 'East of Kidderminster' Urban Extension and would welcome ongoing proactive discussions with the District Council in bringing forward these land interests within the Plan period. However, it should be noted that Taylor Wimpey have further land interests to the south of Comberton Road that do not form part of the strategic allocation, that would provide future growth opportunities within Kidderminster beyond the plan period.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Gladman Developments Ltd	LPPS860	Policy 6D	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The policy identifies the following strategic allocations for development. • Lea Castle Village – 1,400 dwellings • Kidderminster Eastern Extension – 1,440 dwellings Whilst Gladman do not object to the use of SUEs to deliver housing to meet identified needs, it is important that any such site		Yes	To discuss the issues raised in our written representations

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							is fully evidenced based on its consideration of deliverability, viability and other policy factors. Policies 31 and 31.1 provide the requirements of how the Lea Castle Village will be achieved through the plan period. In this regard, it is noted that the site will deliver 1,400 dwellings with affordable housing provision expected to be in line with the requirements set out in Policy 8B with provision being lower in the central part of the site owing to demolition and infrastructure costs. Gladman raise concerns in relation to the above site and its ability to deliver the total quantum of development. In this regard, Gladman has commissioned CSA Environmental to undertake a capacity assessment based on the Council's vision (see attached) According to the calculations of the proposed residential areas and the potential number of dwellings within each parcel, the density varies from 16dph to 82dph as follows: • Northern Parcel – proposed residential area: approximately 6.2ha (up to 100 dwellings at 16dph); • Western Parcel: Proposed residential area: approximately 13.6ha (up to 400 dwellings at 29.5dpa); • Central Parcel: Proposed residential area: approximately 18.38ha (up to 600 dwellings at 33dph); and • Eastern Parcel: Proposed residential area: approximately 3.65ha (up to 300 dwellings at 82dph). Given the evidence above, it is unrealistic to assume that the site will be delivered in full at the suggested densities owing to the fact that this would also be contrary to the average density of 35dph identified in Policy 8A of the Plan. It would also be unlikely for the Council to be able to deliver the site viably considering the policy obligations of affordable housing and technical standards set out within the Plan. Furthermore, it is unclear from the Council's evidence base why the site has been selected for release as it provides a 'significant contribution' to the purposes of the Green Belt according to the Council's evidence base. This matter is discussed in more detail under Policy 7A representations.			
Campaign to Protect Rural England	LPPS317	Policy 6D	No	No	Yes	Justified Consistent with National	We object to this policy, but leave detailed arguments on site allocations to be dealt with by means of objections to more specific site allocation policies later in the Plan, particularly policies 31 & 32.	Delete it altogether	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY

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						Policy				of the argument.
Bareford David	LPPS121	6.27	Yes	No		Positively Prepared Justified	The Lea Castle site seems to be totally unsuitable for the housing needs of Wyre Forest. The site, on Green Belt land, has massively increased from the consultation document last year - WFR/WC/15. Of 1400 dwellings now proposed, only 200 will be for affordable housing at the most. If the planned bus provision for this village is the same for nearby Cookley then there will be no effective bus service for this population especially for any 65+ that are accommodated. The large majority of houses will be bought by people who will commute to Birmingham along an already congested route with poor access onto this in the first place. The Lea Castle West site and to a lesser extent Lea Castle North will join Kidderminster to Cookley no matter how deep the tree screening will be. Not only will it link the two areas but will create congestion on the A449, already an accident blackspot. It pays lip service to employment prospects and to a village centre.		Yes	As before
Historic England	LPPS223	Policy 6E	Yes	No	Yes	Positively Prepared Effective Consistent with National Policy	Policy 6E regarding market towns would be more effective and demonstrate a positive approach to the historic environment within the Plan is a reference to the local historic environment was included. Text previously agreed at a meeting during the Plan process does not appear to have been included in this iteration of the Plan.	Revise Policy 6E - Role of Stourport-on-Severn..... Paragraph 1 to read: "Within the District's market towns of Stourport-on-Severn and Bewdley, both of which have Conservation Areas (& other heritage assets?) at their town centres, the following development proposals will be sought:" Revise Policy 6E Stourport-on-Severn: Add bullet point: "Development affecting any of the three conservation areas should conserve or enhance the character or appearance of those areas"	No	
Barratt Homes West Midlands	LPPS781	Policy 6E	Yes	No	Yes	Effective	The Plan currently recognises that Stourport should make an important contribution toward meeting the District's requirement for new homes. The settlement is a sustainable location for development and, unlike Kidderminster, there is land outside of the settlement boundary that is not within Green Belt that can be allocated for residential development. The policy advises that the focus for development will be on brownfield sites within the town, supplemented by greenfield release. It is our view that the wording of this policy is	Wording of 6E is inappropriate. There is land outside the settlement boundary not within the Green Belt that can be allocated for residential development.		The first bullet point in the Stourport-on-Severn section of Policy 6E should be amended to advise that Stourport-on-Severn is expected to make an important contribution to meeting the District's requirements for new homes. The focus will be on

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							inappropriate. Development outside of the settlement boundary is required in order to meet the Districts housing requirement. However, non greenfield sites are available and allocated. In addition, once adopted, the allocations in Stourport that currently sit outside of the settlement boundary, will be included within the boundary for all intents and purposes.			brownfield sites within the urban area and sustainable, suitable greenfield sites such as the site at Pearl Lane, which address all of the criteria and could make a significant contribution to meeting the Districts housing requirements.
Persimmon Homes Limited	LPPS814	Policy 6E	Yes	No	Yes	Justified Effective	Policy 6E – Role of Stourport-on-Severn and Bewdley as Market Towns, states that "*Bewdley's contribution towards the District's housing need will be limited to meet local needs on allocated sites.*" This text suggests a restrictive role for growth in Bewdley, mirroring the approach of the 2010 Core Strategy. It is important to note that the Council is now, rightly, progressing with a more positive approach for growth in Bewdley including new allocations for housing, however this is not aligned with the overall strategic direction of growth for the town. RPS has submitted a representation, on behalf of Persimmon Homes, that relates to the level of housing need within the District that should be read alongside this representation. The Council's Reasoned Justification to the policy indicates that the need for Stourport and Bewdley to provide facilities and services should be balanced with their proximity to Kidderminster as the strategic centre of the District (paragraph 6.35 refers). In this regard, although both locations are accessible to Kidderminster, Bewdley is a closer hub and is more accessible by different forms of sustainable transport. By stating that the level of housing development within Bewdley will be limited to meet local need the Policy fails to recognise Bewdley as one of the more sustainable centres for growth. As such, it cannot be said that the policy is positively prepared as it presents terminology that is inconsistent with the 2018 National Planning Policy Framework. RPS has also submitted a representation to Policy 6B that queries the way in which the level of services that are present in Bewdley are referred to within the Plan and why amendments are necessary in order to make the Plan sound.	Bewdley: · It is proposed that this policy for Bewdley is modified to more accurately reflect the Council's intentions for development in the town. This should build upon the sustainability of the centre, and the ability for the town to accommodate further growth around the Catchems End area, which will link to the wider allocations strategy proposed by the Council	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity, as the agent for the proposed allocation, to discuss these as part of the Examination.
West Midland Safari Park	LPPS905	6C	Yes	No	Yes	Consistent with National Policy	Policy 6E looks to enhance the role of Bewdley as a sustainable tourist destination through a particular focus on transport links to among other places, West Midland Safari Park. The policy could be used to justify requests to developers to make off-site provision or financial contributions. WMSP object to this Policy as currently drafted. As with Policy 6C, this policy and/or the supporting text should be amended to more closely reflect	The amendments should be as 6C	Yes	RPS would like to elaborate on why it is concerned the Policy as presently drafted gives the Council an opportunity to request off-site improvements and or contributions towards

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							paragraph 108 of the National Planning Policy Framework so that it is made clear that such provision or such contributions will only be sought where the residual cumulative impact of developments are severe, and where it is practical and viable so to do.			transport infrastructure, and how this is contrary to paragraph 108 of the National Planning Policy Framework which seeks to ensure that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
Taylor Wimpey West Midlands	LPPS1000	Policy 6E		Yes			Comberton Road, Kidderminster The identified role of Stourport on Severn and Bewdley as part of the development strategy for the District is broadly supported, recognising that Stourport-on-Severn has a more strategic role than Bewdley within the settlement hierarchy. Stourport-on-Severn is identified as a 'Large Market Town' within Policy 6B, containing a comprehensive range of local services, amenities, public transport and employment serving the town and its rural hinterland. As a sustainable settlement, it is right that Stourport-on-Severn makes an important contribution to meeting the District's requirements for new homes within the Plan period. Taylor Wimpey is promoting further land within Stourport-on-Severn and these are considered further through separate representations.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	LPPS1034	Policy 6E		Yes			Land at Bewdley Road North Stourport The identified role of Stourport on Severn and Bewdley as part of the development strategy for the District is broadly supported, recognising that Stourport-on-Severn has a more strategic role than Bewdley within the settlement hierarchy. Stourport-on-Severn is identified as a 'Large Market Town' within Policy 6B, containing a comprehensive range of local services, amenities, public transport and employment serving the town and its rural hinterland. As a sustainable settlement, it is right that Stourport-on-Severn makes an important contribution to meeting the District's requirements for new homes within the Plan period. Taylor Wimpey is promoting Land at Bewdley Road North Stourport for development. Further details in respect of this site are attached.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained

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										therein.
Euro Property Investments Ltd.	LPPS786	6E	Yes	Yes	Yes		In light of EPIL's land interests at Bewdley, we welcome the inclusion of this policy in that it establishes the importance of Bewdley in meeting the development needs of the District. Specifically, we welcome the reference in the 6th bullet point to the need to release land from the Green Belt around the Market Towns in order to contribute to the housing requirement. In relation to Bewdley, we concur that site specific allocations such as that at the Stourport Triangle will help meet local housing needs, whilst also respecting the Town's Conservation Area and more limited availability of jobs and services. We comment further on the draft Stourport Triangle allocation below.		Yes	We are promoting one of the four draft residential allocations in Bewdley and therefore key to the delivery of new housing in the settlement
Gladman Developments Ltd	LPPS861	Policy 6E	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	It is supported that the District's market towns of Stourport-on-Severn and Bewdley will play a key role in accommodating new growth opportunities to meet identified housing needs. Whilst it is supported that Stourport-on-Severn will play a key role in delivering new growth opportunities to meet identified housing needs, Gladman object to the intention to limit Bewdley's contribution towards the District's housing needs. This approach is in conflict with the presumption in favour of sustainable development as it looks to restrict the extent to which a sustainable settlement can contribute to meeting the housing and economic development needs of the area. Bewdley scores remarkably well against the Council's Settlement Hierarchy methodology, scoring 2 less than Stourport-on-Severn in terms of the services available within the settlement. It is apparent that Bewdley has a wide range of key services and facilities reflective of a large market town (i.e. comparable with Stourport-on-Severn) but with the exception of equivalent frequency of public transport provision. However, it should be noted that Bewdley has more services available than Stourport-on-Severn and these services could be improved via s106 contributions. In addition, whilst it is accepted that employment opportunities within the parish are less than employment opportunities available in Kidderminster, this would be the position of any settlement within the district. It is considered that Bewdley can take a greater role in the delivery of sustainable development owing to the fact that many of the services and facilities located in Bewdley are also relied upon by smaller settlements for their provision of services and facilities.		Yes	to discuss the issues raised in our submissions

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							Notwithstanding the above, it is a concern that in both cases the Plan seeks to focus growth towards brownfield sites, Green Belt and some limited Greenfield release. In this regard, Gladman raise concern with the release of land from the Green Belt as the allocations proposed appear to contradict the Council's evidence base and is discussed in greater detail in section 5.9 of these representations. Gladman consider that both settlements can play a larger role in meeting identified needs than what is currently being planned for and additional allocations should be included within the Plan given the concerns raised in relation to the ability of Lea Castle to deliver at the expected density. Gladman are promoting land at The Lakes Road, Bewdley which would help to address the existing need in Bewdley, without requiring a change to the existing Green Belt boundary on the edge of the settlement.			
West Midland Safari Park	LPPS911	6C	Yes	No	Yes	Consistent with National Policy	Policy 6E looks to enhance the role of Bewdley as a sustainable tourist destination through a particular focus on transport links to among other places, West Midland Safari Park. The policy could be used to justify requests to developers to make off-site provision or financial contributions. WMSP object to this Policy as currently drafted. As with Policy 6C, this policy and/or the supporting text should be amended to more closely reflect paragraph 108 of the National Planning Policy Framework so that it is made clear that such provision or such contributions will only be sought where the residual cumulative impact of developments are severe, and where it is practical and viable so to do.	The amendments should be as 6C	Yes	RPS would like to elaborate on why it is concerned the Policy as presently drafted gives the Council an opportunity to request off-site improvements and or contributions towards transport infrastructure, and how this is contrary to paragraph 108 of the National Planning Policy Framework which seeks to ensure that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
Taylor Wimpey West Midlands	LPPS275	Policy 6E		Yes			Land at Rectory Lane Stourport The identified role of Stourport on Severn and Bewdley as part of the development strategy for the District is broadly supported, recognising that Stourport-on-Severn has a more strategic role than Bewdley within the settlement hierarchy. Stourport-on-Severn is identified as a 'Large Market Town' within		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of

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							Policy 6B, containing a comprehensive range of local services, amenities, public transport and employment serving the town and its rural hinterland. As a sustainable settlement, it is right that Stourport-on-Severn makes an important contribution to meeting the District's requirements for new homes within the Plan period. Taylor Wimpey is promoting Land at Rectory Lane, Areley Kings for development. Further details in respect of this site are attached.			the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Campaign to Protect Rural England	LPPS318	Policy 6F	No	No	Yes	Justified Effective	The policy should be more specific as to safeguarded or supporting community facilities other than pubs and shops. Otherwise we support the policy. This may be covered in other more specific policies; if so, they should be cross-referenced	insert "Village Halls, churches, and other community infrastructure"	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Taylor Wimpey West Midlands	LPPS1001	Policy 6F		No		Justified	Comberton Road, Kidderminster Taylor Wimpey broadly supports Policy 6F which seeks to limit new residential development in the rural villages to meeting local housing needs only. This is reflective of the settlement hierarchy set out within Policy 6B, recognising that Kidderminster, Stourport-on-Severn and, to a lesser extent Bewdley, are the most sustainable locations for meeting identified development needs. It is, however, not clear how the role of the proposed 'new village' at Lea Castle correlates with this policy.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Marmaris Investments Ltd.	LPPS842	Policy 6F	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	this policy sets out generic statements, without being specific or informative as to how these objectives will be delivered. The plan strategy of low levels of growth in these areas goes against the aims of this policy. There is a housing need in Blakedown, arising from the HNS and the NLP yet no allocations are made to meet that need. This is not responsive or positive planning, an allocation at Station Drive should be made. The third and fourth bullet points at Policy 6F should make it clear that where there is a need for new housing in villages, priority should be given to locations which are well connected to higher order settlements and which already have key services. In this respect, Blakedown is recognised at paragraph 2.8 of the Plan as one of the	The third and fourth bullet points at Policy 6F should make it clear that where there is a need for new housing in villages, priority should be given to locations which are well connected to higher order settlements and which already have key services.	Yes	Green Belt / Transportation / Housing issues are important areas of the plan and inclusion in the debate at the examination will be useful to the Inspector

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							'larger more accessible villages…served by both facilities and public transport, Blakedown having a railway station' and at Table 3.0.1 that it provides '…local residents and the surrounding local hinterlands with key local services.'			
Taylor Wimpey West Midlands	LPPS1035	Policy 6F		No		Justified	Land at Bewdley Road North Stourport Taylor Wimpey broadly supports Policy 6F which seeks to limit new residential development in the rural villages to meeting local housing needs only. This is reflective of the settlement hierarchy set out within Policy 6B, recognising that Kidderminster, Stourport-on-Severn and, to a lesser extent Bewdley, are the most sustainable locations for meeting identified development needs. It is, however, not clear how the role of the proposed 'new village' at Lea Castle corresponds with this policy.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Gladman Developments Ltd	LPPS862	Policy 6F	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Whilst it is recognised that the District's main towns will provide the majority of the Council's housing needs, the Plan should not seek to limit the ability of future growth in lower order settlements. Although a limited contribution for housing is proposed, the plan contains no mechanism by which a settlement that is assumed to function at a lower level within the hierarchy is able to improve its sustainability through much needed new development and in doing so allow rural communities living within them to thrive. The fact that this policy prevents the development on best and most versatile land and prioritises the development of previously developed land is not in accordance with national policy and should be reconsidered.		Yes	To discuss the issues raised in our written submissions.
Taylor Wimpey West Midlands	LPPS442	Policy 6F		No		Justified	Land at Rectory Lane Stourport Taylor Wimpey broadly supports Policy 6F which seeks to limit new residential development in the rural villages to meeting local housing needs only. This is reflective of the settlement hierarchy set out within Policy 6B, recognising that Kidderminster, Stourport-on-Severn and, to a lesser extent Bewdley, are the most sustainable locations for meeting identified development needs. It is, however, not clear how the role of the proposed 'new village' at Lea Castle corresponds with this policy.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to

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										participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Bareford David	LPPS118	6.4	Yes	No	Yes	Justified	The Local Plan estimates a population growth of approx. 5,000 in the next 20 years. In the same paragraph we are told that the 65+ age group will climb by 7,600. This means that the under 65 age group will contract by 2,600 and so one wonders the requirement for 5,520 houses and only 487 bed spaces for the elderly. Even if the population growth is 5,000 then the NPPF of 1.8 people/ house means we would only need 2,800 houses.		Yes	To be heard
Mayman Nick	LPPS193	6.4	Yes	No	Yes	Justified	The total number of new dwellings required for the period 2016-2036 is reflected in Table 6.0.2 which, in summarising the proposed new dwellings for each of the WFDC areas, arrives at an overall total of 6341 allowing for the recommended 15% uplift contingency However, this total appears inconsistent with the evidence contained in the 2018 Housing Need Study which (in Table 7.3B) shows a requirement of 3654 additional homes for the same period. Even allowing for what appears to be a constantly changing methodology in projecting future housing needs, an oversupply of 2687 (42%) seems totally unjustified and not based on what is described in the NPPF as "proportionate evidence"	An overall reduction in the total number of new dwellings in line with the projections laid out in the October Housing Need Study	Yes	See comment on Section 7 comment form
Parsonage Louise	LPPS155	6.4 b	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	I feel that the proportion of affordable homes is too low in all planned developments. In the case of the Lea Castle Village, there is an emphasis on executive homes which is beyond the affordability of much of the local population. It would therefore attract commuters, adding to traffic and additional pollution.		No	
Wicks Janet	LPPS22	6.3					My comment is not in relation to any of the subjects listed above. My comment is to request that some consideration is given to people who have an interest in self building (as opposed to custom built) bespoke, high quality, energy efficient homes, this is especially important for the aging population who want to downsize, but find developer built homes do not meet their needs. Also for people who have an interest and a passion in building from non standard materials, such as straw bale, becoform etc. Perhaps an area of a number of plots that are made available to people who are on the self build register, where they can build			

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							bespoke individually designed houses. These do not have to be high end houses, they could also be low cost and affordable.			
Bareford David	LPPS119	6.5	Yes	No	Yes	Justified	The NPPF should be challenged as a means of estimating housing needs. . If the NPPF estimates on 1.8 people/household then why are half the houses in the plan 3+ bedroom houses?		Yes	As before
South Worcestershire Authorities	LPPS401	Paragraph 6.5		No		Consistent with National Policy	Paragraph 6.5 refers to the housing number being based on 2016 household projections. The most recent Government advice is to ignore those projections and use the 2014 based household projections instead and therefore, the basis of the housing number should be reconsidered.	Household projection data in paragraph 6.5 should use 2014 instead of 2016 projections, to be line with government advice.	No	Base the housing number on the 2014 based household projections
Campaign to Protect Rural England	LPPS293	Paragraph 6.10	No	No	Yes	Justified Consistent with National Policy	See detailed paper on Housing by Gerald Kells, sent herewith: * No exceptional circumstances exist for allocating more than the Objectively Assessed Need. NPPF para 137 requires that WFDC 'examined fully all other reasonable options'. One such option should have been not allocating more than Objectively Assessed Need. * No allowance has been made in the computations of windfalls, which have historically have been a modest but significant source of supply.	Delete Eastern extensions and Lea Castle North, East, and West sites	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Hagley Parish Council	LPPS213	6.10	Yes	No	Yes	Justified Effective Consistent with National Policy	We do not dispute that the Objectively Assessed Need housing target should be 5420. We accept that there are exceptional circumstances that mean that it is necessary to alter the Green Belt boundaries, though we do not like it. However, there are no Exceptional Circumstances requiring WFDC to take more land out of the Green Belt than is required to meet that target. It is a well-known fact that not all house building comes from allocated sites. There are also windfall sites. Some of these are known and listed in HELAA as deliverable, but due to their small size do not need to be listed individually in the Plan. Others will probably come forward during the Plan Period. In particular the supply of brownfield sites is not a single finite resource, but one that is regularly being renewed as existing uses cease. The policy makes no allowance for windfalls. Paragraph 6.10 in allocating, not 5,420 less estimated windfalls, but a target of 6,341 is failing to accord with NPPF policy, which requires WFDC to show that it has examined fully all other reasonable options for meeting its identified need for development (NPPF para 137)	The housing targets should be reduced: 1. To reflect windfalls as a probable source of supply 2. So that the total target (including windfalls is only 5,420), not some higher figure 3. Site allocations should be reduced to what is necessary to meet the target net of windfalls.	Yes	To amplify as necessary this objection and natural justice, ensuring that the inspector hears both sides of the argument,

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY

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							The figure of 6,341 greatly exceeds 5,420 less windfalls and is thus contrary to NPPF chapter 13 on protecting the Green Belt.			
Harrison Nikki	LPPS753	Paragraph 6.11, Duty to Co-operate	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Disagree with paragraph 6.11, Duty to Co-operate. Do not agree that Wyre Forest District is a self contained HMA. It is clear that the District shares a housing market with the periphery of the Black County in particular. The WFDC formal duty to cooperate with neighbouring authorities has not yet been discharged through a Memorandum of Understanding or Statement of Common Ground. It is concluded that they the plan has not been positively prepared.		Yes	
South Worcestershire Authorities	LPPS400	Duty to Cooperate			No	Consistent with National Policy	Wyre Forest District Council require to prepare a Statement of Common Ground. To meet the requirements of the revised NPPF this should be prepared and signed by the relevant Duty to Cooperate Partners.	Prepare a Statement of Common Ground, agree it with relevant Duty to Cooperate partners and publish.	No	
Association of Black Country Authorities	LPPS767	Paragraph 6.11	No	No	No	Positively Prepared Effective Consistent with National Policy	Paragraph 6. 11 of the plan reads "It is clearly demonstrated by the HNS (2018) that, usually in the West Midlands, the Wyre Forest area is co-terminus with the Wyre Forest Housing Market Area. As such the housing requirement reflected by this Plan is based solely on that required for the needs of the Wyre Forest District. However, this does not negate the need for the Plan to be prepared in consultation with the neighbouring and nearby authorities (e.g.other Worcestershire Districts, Birmingham and the Black Country, South Staffordshire, Shropshire): accordingly Wyre Forest District has cooperated with authorities that are both adjoining and beyond in order to consider strategic priorities for the delivery of homes, including cross boundary requirements. The evidence base documents the joint working and other activities demonstrating effective co-operation consistent with the Duty to Cooperate legal requirements and the NPPF".		Yes	The Black Country Authorities would wish to explain to the Inspector the current position regarding unmet housing need.
Bareford David	LPPS120	6.19	Yes	No	No	Justified Effective	The Lea castle development eats into Green Belt. The 600 house area may be justified in reusing the old Lea Castle Hospital site but the extension to 14000 is an unnecessary incursion on Green Belt between Kidderminster and the Black Country. It will almost link Cookley to Kidderminster. It will provide housing for commuters to Birmingham and the Black Country and not encourage movement to provide jobs in the Wyre Forest.		Yes	As before
Sport England	LPPS251	Paragraph 6.36, Policy 6E		Yes			Sport England supports the final bullet in policy 6E, which is consistent with paragraph 97 of the NPPF.		No	
Taylor Wimpey West Midlands	LPPS1019	Table 6.0.2		No		Justified Effective	Land at Rectory Lane Stourport Development Strategy		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the

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							Buffer The Pre-Submission Publication Local Plan identifies a total land supply within Table 6.0.2 to accommodate 6,362 dwellings. It is not clear from Table 6.0.2 whether this relates to net new supply or whether the information relates to a gross figure. Nevertheless, the land supply will provide a buffer to assist in ensuring a housing requirement of 5,520 homes will be provided within the plan period. Whilst the principle of a buffer is supported, advice of the Local Plan Expert Group suggested incorporating a buffer of 20%, which would result in the need to identify additional land equivalent to accommodating in the order of 1,104 additional dwellings. Therefore, in total, the Local Plan should be providing enough land equivalent to the delivery of a total of 6,624 dwellings over the plan period to 2036 in Wyre Forest District. To address this element of unsoundness within the Local Plan, additional allocations should be identified to deliver a minimum of a further 262 dwellings. *Urban Extensions vs Dispersal* Whilst it is good planning practice to reap the benefits of large scale development on the urban edge to comprehensively plan a neighbourhood and secure the delivery of required infrastructure, it is important that housing delivery is maintained throughout the plan period to enable households to form as and when they need to. The best way this can be achieved is through identifying additional sites elsewhere in the District. Further, different housing needs and preferences exist across the District and, therefore, to provide choice and variety to households, in a sustainable manner, is beneficial. This is particularly so when new housing is often a more popular choice for first time buyers given the support provided through the successful 'Help to Buy' initiative. Alternatively, households may choose to relocate elsewhere outside of Wyre Forest, which would be potentially detrimental to the local economy and to support the creation of 1,100 net new jobs to 2036. Whilst housing should be located in the most sustainable locations from the perspective of minimising the need to travel, there are a number of social benefits to locating homes in more rural locations (i.e. sustaining local services, allowing families to live nearby relatives and, inevitably, achieving a balanced population to help a location to thrive). Development can bring with it much needed facilities and infrastructure to communities, which could improve the quality of life for residents. It is therefore important that a reasonable level of development is dispersed to deliver sustainable communities across Wyre Forest. This should, however, not undermine the			examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

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							vision for a comprehensive urban extension to the east of Kidderminster and the strategic benefits this could deliver. The Pre-submission Publication document appears to represent a combination of both Option 'A' and Option 'B' sites identified through within the Preferred Options Local Plan consultation document. This balanced strategy is supported in principle by Taylor Wimpey and would assist in providing deliverable and sustainable growth in Wyre Forest. *Housing Trajectory* It is noted that a housing trajectory is set out at page 271 of the Pre-Submission Publication Local Plan (Picture 37.1). This identifies a range of assumed annual completions from a low point in 2017/18 (141 net completions) to a peak of over 450 completions in 2020/21. However, detailed site-specific information is not provided and therefore it is impossible to provide any scrutiny to determine whether the Council's assumptions are robust. It is extremely important that a site specific Housing Trajectory is prepared so that the development rates of each site are fully transparent and can be publicly scrutinised. A robust trajectory is important to demonstrate that the strategic policies of the Local Plan provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address housing needs over the plan period by planning for and allocating sufficient sites to deliver strategic priorities (para 23). The policies of the Local Plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 (para 67). The identification of deliverable and developable sites should accord with the definitions set out in the 2018 NPPF Glossary.			
Taylor Wimpey West Midlands	LPPS1003	Table 6.0.2		No		Justified Effective	**Comberton Road Kidderminster** **Development Strategy** ***Buffer*** The Pre-Submission Publication Local Plan identifies a total land supply within Table 6.0.2 to accommodate 6,362 dwellings. It is not clear from Table 6.0.2 whether this relates to net new supply or whether the information relates to a gross figure. Nevertheless, the land supply will provide a buffer to assist in ensuring a housing requirement of 5,520 homes will be provided within the plan period. Whilst the principle of a buffer is supported, advice of the Local Plan Expert Group suggested incorporating a buffer of 20%, which would result in the need to identify additional land		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern

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							equivalent to accommodating in the order of 1,104 additional dwellings. Therefore, in total, the Local Plan should be providing enough land equivalent to the delivery of a total of 6,624 dwellings over the plan period to 2036 in Wyre Forest District. To address this element of unsoundness within the Local Plan, additional allocations should be identified to deliver a minimum of a further 262 dwellings. ***Urban Extensions vs Dispersal*** Whilst it is good planning practice to reap the benefits of large scale development on the urban edge to comprehensively plan a neighbourhood and secure the delivery of required infrastructure, it is important that housing delivery is maintained throughout the plan period to enable households to form as and when they need to. The best way this can be achieved is through identifying additional sites elsewhere in the District. Further, different housing needs and preferences exist across the District and, therefore, to provide choice and variety to households, in a sustainable manner, is beneficial. This is particularly so when new housing is often a more popular choice for first time buyers given the support provided through the successful 'Help to Buy' initiative. Alternatively, households may choose to relocate elsewhere outside of Wyre Forest, which would be potentially detrimental to the local economy and to support the creation of 1,100 net new jobs to 2036. Whilst housing should be located in the most sustainable locations from the perspective of minimising the need to travel, there are a number of social benefits to locating homes in more rural locations (i.e. sustaining local services, allowing families to live nearby relatives and, inevitably, achieving a balanced population to help a location to thrive). Development can bring with it much needed facilities and infrastructure to communities, which could improve the quality of life for residents. It is therefore important that a reasonable level of development is dispersed to deliver sustainable communities across Wyre Forest. This should, however, not undermine the vision for a comprehensive urban extension to the east of Kidderminster and the strategic benefits this could deliver. The Pre-submission Publication document appears to represent a combination of both Option 'A' and Option 'B' sites identified through within the Preferred Options Local Plan consultation document. This balanced strategy is supported in principle by Taylor Wimpey and would assist in providing deliverable and sustainable growth in Wyre Forest. ***Housing Trajectory*** It is noted that a housing trajectory is set out at page 271 of the Pre-Submission Publication Local Plan (Picture 37.1). This identifies a range of assumed annual completions from a low			Extension in the overall spatial strategy contained therein.

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							point in 2017/18 (141 net completions) to a peak of over 450 completions in 2020/21. However, detailed site-specific information is not provided and therefore it is impossible to provide any scrutiny to determine whether the Council's assumptions are robust. It is extremely important that a site specific Housing Trajectory is prepared so that the development rates of each site are fully transparent and can be publicly scrutinised. A robust trajectory is important to demonstrate that the strategic policies of the Local Plan provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address housing needs over the plan period by planning for and allocating sufficient sites to deliver strategic priorities (para 23). The policies of the Local Plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 (para 67). The identification of deliverable and developable sites should accord with the definitions set out in the 2018 NPPF Glossary.			
Taylor Wimpey West Midlands	LPPS1033	Table 6.0.2		No		Justified Effective	**Land at Bewdley Road North Stourport** **Development Strategy** ***Buffer*** The Pre-Submission Publication Local Plan identifies a total land supply within Table 6.0.2 to accommodate 6,362 dwellings. It is not clear from Table 6.0.2 whether this relates to net new supply or whether the information relates to a gross figure. Nevertheless, the land supply will provide a buffer to assist in ensuring a housing requirement of 5,520 homes will be provided within the plan period. Whilst the principle of a buffer is supported, advice of the Local Plan Expert Group suggested incorporating a buffer of 20%, which would result in the need to identify additional land equivalent to accommodating in the order of 1,104 additional dwellings. Therefore, in total, the Local Plan should be providing enough land equivalent to the delivery of a total of 6,624 dwellings over the plan period to 2036 in Wyre Forest District. To address this element of unsoundness within the Local Plan, additional allocations should be identified to deliver a minimum of a further 262 dwellings. ***Urban Extensions vs Dispersal*** Whilst it is good planning practice to reap the benefits of large scale development on the urban edge to comprehensively plan a neighbourhood and secure the delivery of required infrastructure, it is important that housing delivery is maintained throughout the plan period to enable households to form as and when they need to. The best way this can be achieved is through identifying		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							additional sites elsewhere in the District. Further, different housing needs and preferences exist across the District and, therefore, to provide choice and variety to households, in a sustainable manner, is beneficial. This is particularly so when new housing is often a more popular choice for first time buyers given the support provided through the successful 'Help to Buy' initiative. Alternatively, households may choose to relocate elsewhere outside of Wyre Forest, which would be potentially detrimental to the local economy and to support the creation of 1,100 net new jobs to 2036. Whilst housing should be located in the most sustainable locations from the perspective of minimising the need to travel, there are a number of social benefits to locating homes in more rural locations (i.e. sustaining local services, allowing families to live nearby relatives and, inevitably, achieving a balanced population to help a location to thrive). Development can bring with it much needed facilities and infrastructure to communities, which could improve the quality of life for residents. It is therefore important that a reasonable level of development is dispersed to deliver sustainable communities across Wyre Forest. This should, however, not undermine the vision for a comprehensive urban extension to the east of Kidderminster and the strategic benefits this could deliver. The Pre-submission Publication document appears to represent a combination of both Option 'A' and Option 'B' sites identified through within the Preferred Options Local Plan consultation document. This balanced strategy is supported in principle by Taylor Wimpey and would assist in providing deliverable and sustainable growth in Wyre Forest. ***Housing Trajectory*** It is noted that a housing trajectory is set out at page 271 of the Pre-Submission Publication Local Plan (Picture 37.1). This identifies a range of assumed annual completions from a low point in 2017/18 (141 net completions) to a peak of over 450 completions in 2020/21. However, detailed site-specific information is not provided and therefore it is impossible to provide any scrutiny to determine whether the Council's assumptions are robust. It is extremely important that a site specific Housing Trajectory is prepared so that the development rates of each site are fully transparent and can be publicly scrutinised. A robust trajectory is important to demonstrate that the strategic policies of the Local Plan provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address housing needs over the plan period by planning for and allocating sufficient sites to deliver strategic priorities (para 23). The policies of the Local Plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY

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							sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 (para 67). The identification of deliverable and developable sites should accord with the definitions set out in the 2018 NPPF Glossary.			
Sport England	LPPS248	Policy 6B, Table 6.0.3		No		Positively Prepared Consistent with National Policy	Table 6.0.3 in policy 6B does not include sports and recreations uses as suitable development within Stourport-on-Severn.	Add sport and recreation uses to table 6.0.3 for Stourport-on-Severn.	No	
Mowbray Colin	LPPS26	6A A Sustainable Future - Development Strategy		No		Justified	I oppose the Wyre Forest proposed plans to build on the Green Belt and prime agricultural land east of Kidderminster. My understanding is that Green Belt land is an area of protected land around large estates. The main purpose is to stop continued growth of these estates and maintain agriculture, forestry, wildlife, open space and above all clean air. Areas with this designation must not be built on. Offmore and Comberton is a large housing estate and people who live here need that open space not only for our physical health but also for our mental health, further more I believe Wyre Forest council have a duty of care to ensure this. In today's environment, traffic, noise, pollution, strains and stresses of every day life the last thing the residents, their children and grandchildren need is another ring of development surrounding it. The very reason the authorities set up the Green Belt policy in the first place are exactly to stop what the Wyre Forest are proposing now but more importantly the people need the protection of the Green Belt more than ever before. We live by the law of the land, you do not dip in and out to suit.	Secondly, I fully understand the need for more homes but in this case there are many alternative sites. I also fully appreciate that many of these sites are not so attractive to the Wyre Forest or to a builder mainly I suspect due to size and cost, but I sincerely believe that the main consideration for future planning is 'what is best' for people and the environment which in this case includes the Green Belt and not an easy cheap solution by a politically motivated council or a big out of town builder. My final point is that any new future development anywhere, consideration must be given to the people and the environment which are already there. Things like natural screens, tree bunds, open space, anti traffic noise and pollution measures etc are needed to maintain and protect the existing environment, residents and character.		

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 7: STRATEGIC GREEN BELT REVIEW

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Homes England	LPPS96	Policy 7A	Yes	Yes	Yes		The Council's justification for reviewing Green Belt boundaries is clearly set out in the context of needing to accommodate development, and in particular meeting affordable and market housing needs. In the case of Lea Castle, the site is surrounded by the local road network, creating a long term robust boundary to the village and ensuring that the development is contained within this area, avoiding coalescence with other settlements in future. The land at Lea Castle beyond the previously developed part of the site accounts for only 0.25% of the Wyre Forest Green Belt and only 0.022% of the West Midlands Green Belt.		Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Bareford David	LPPS123	7A	Yes	No	No	Positively Prepared	The Lea Castle site has increased from that in 2017 without justification. There is no mention of loss of Green Belt land in Caunsall for the houses planned there.		Yes	As before
Bareford Karin	LPPS182	7A	No	No	No	Positively Prepared	There are no special circumstances evidenced, to justify the removal of Green Belt for the Lea Castle village. It will merge Cookley to Kidderminster and no visual measures can moderate this. That the site will become a sustainable village has not been evidenced, as the village local services, like school, doctors, shop etc are only aspirational.			
Hagley Parish Council	LPPS229	7A	Yes	No	Yes	Justified Effective Consistent with National Policy	This objection follows from sundry others. We object to the removal of Lea Castle East, West, and North and the two sites along Husum Way from the Green Belt. Furthermore, since the remainder of the Hurcott ADR is being designated as a Green Gap under policy 30.12, it would be better if it were restored to the Green Belt.		Yes	
Campaign to Protect Rural England	LPPS320	Policy 7A	No	No	Yes	Positively Prepared Effective	Paragraph 7.6 is inconsistent with Policy 7B. The paragraph says that the ADRs will be brought forward, which implies that they will certainly be released. The Policy merely says that they will be "subject to consideration" for release.	The paragraph should be amended: delete: brought forward; substitute: considered.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument. However we would hope this is a minor correction that can be accepted without debate.
Campaign to Protect Rural England	LPPS322	Policy 7A	No	No		Justified Consistent with National	Again all reference to the Lea Castle and Kidderminster East sites should be removed. Detailed reasons will be given in more specific objections on policies 31 & 32 relating to these	Delete section on Lea Castle and Kidderminster East sites Other alterations may be needed to adjust the proposed Green Belt	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides

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						Policy	sites. For clarity the reference to villages should refer back to those listed as washed over by Green Belt in Policy 6B. These washed over villages should have designated village envelopes within which infill is permissible.	boundaries around other objectionable sites. More detail of village envelopes for washed over villages		of the argument.
Shakespeare Joseph	LPPS480	Policy 7A	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Not enough notification given and poor use of the brownfield sites in the area being used first. It appears to be just for monetary gain without thought to affordable housing.		No	
Wills Lilian	LPPS521	Policy 7a	No	No	No	Justified Consistent with National Policy	The consultation leaflet was never received at this address. Other villages in this area e.g. Wolverley have not had any extra housing planned. I have no objection to the housing on Lea Castle but object to the extra housing adjoining Green Belt. Slowing but surely this is infilling and soon will be no clear boundaries. This plan does not meet the needs of the village/district for social housing. This development will benefit commuters but not local people. The percentage of social housing benefits the developer who won't increase the percentage as this affects their profit. Local people have been on the waiting list for social housing, families are being split as they move away. This goes against government policy where they are aiming to encourage families to provide/support for the elderly to alleviate pressures on local councils. Wyre Forest is classed as a low age area where local families cannot afford social housing without claiming housing benefit. This development will have a low ratio of affordable homes compared to other councils and the ratio has already been reduced from the original 30%.	Firstly there should be another consultation period. On the original Wolverley and Cookley 2018 Housing Needs Plan, 159 affordable/social/elderly housing needs were identified. However on this plan it is predominantly medium houses and executive homes which were never identified as a need. To comply with the local needs the proportion of affordable housing should be increased	No	
Plant Ian	LPPS527	Policy 7A	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	NPP4 (section 7.7) outlines a statement saying "Green Belt boundaries should only be altered in exceptional circumstances" but I fail to understand how this is exceptional circumstances. There are numerous sites within Wyre Forest where derelict buildings can and should be developed to provide additional housing to meet needs without touching Green Belt. There are plans to develop land adjacent A449 at the cross roads which was never included in the original Wyre Forest review so local residents including my self have never been	The only way that this process can be deemed fair and ethical is to scrap the Local Plan and start again using unbiased consultants and clear consultation of residents.	Yes	To make sure it is fair and ethical.

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							consulted on this. A consultant names Amec Foster Wheeler who worked on the Breen Belt Review 2016/17 also represented Homes England who plan to develop Green Belt land as part of the Local Plan - surely this is unethical on "Conflict of Interest" grounds.			
Barratt Homes West Midlands	LPPS782	Policy 7A	Yes	Yes	Yes		We support recognition that a strategic Green Belt review is required. It is not possible for Wyre Forest District Council to meet its housing growth requirements without Green Belt land release. A Green Belt review is, therefore, a necessity if the local authority is to meet the housing growth requirements. It is, however, necessary for suitable non-Green Belt sites to be allocated for development, before Green Belt land release can be supported. The Site on Pearl Lane demonstrates a perfect opportunity for development outside of the Green Belt, that can significantly contribute to addressing the housing requirement of the District.		No	
Persimmon Homes Limited	LPPS811	Policy 7A	Yes	No	Yes	Justified Effective	The Local Plan is underpinned by a strategy to meet the local housing need, which is a key requirement of the 2018 NPPF. Beyond existing settlement limits, the District of Wyre Forest is largely Green Belt, which limits the opportunity for growth in sustainable locations. Paragraph 136 of the NPPF is clear that where exceptional circumstances are justified, alteration to Green Belt boundaries can be made and Policy 7A clarifies that such circumstances exist. Accordingly, Policy 7A identifies a number areas for Green Belt release which will facilitate the allocation of a number of strategic and non-strategic sites around Kidderminster, Stourport and Bewdley. This is the correct decision to make, as growth will be severely limited without this strategic decision and RPS agrees that this is best dealt with through the Development Plan in a coordinated way. In particular, RPS supports the release of Green Belt to the east of Bewdley, along Kidderminster Road. Whilst the location of this land is clear from the accompanying proposals map, this information is not clear as part of the policy and should be strengthened. This approach should also be taken in respect of the Reasoned Justification (RJ) to the Policy. Whilst the RJ is clear why there are now development pressures which necessitate Green Belt release, the text could be clearer in drawing on the Council's evidence base (touched upon as part of	Drawing on the points above, RPS considers that Policy 7A should be amended to clarify which parcels of land will be released from the Green Belt, linked to the accompanying Proposals Map. Further to this, the RJ supporting the policy needs to be amended to specifically reflect the evidence base and how this has led to the particular parcels of land to be released under this policy. For the release of Green Belt land at Bewdley, this should draw on the landscape constraints limiting the suitability of alternative land on the west of Bewdley. In terms of the site WA/BE/3 in particular, the RJ should refer to the locally specific effects of development recorded as part of the Council's Green Belt Review as part of a high level	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination.

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							Paragraph 7.11) and why the proposed sites are being released.	strategic assessment. In addition to the Council's assessment, Pegasus has undertaken a detailed Green Belt assessment of site WA/BE/3 on behalf of Persimmon Homes. This assessment has considered the local landscape context, and how the impacts of the development could be mitigated through design considerations and green infrastructure. The assessment has been prepared as a preliminary Landscape Visual Assessment(LVA) and addresses matters of individual resources, character areas and representative viewpoints. The LVA also considers the interaction between landscape character and views in relation to physical components and also 'openness' and the consequent impact on Green Belt (in landscape and visual terms). The assessment finds that with a suitable approach to mitigation, and the implementation of a robust landscape and green infrastructure strategy, the masterplan on the site will be physically and visually well contained, show clear defensible boundaries and consequently, will be acceptable in landscape and visual terms The influence of the emerging proposals on the five purposes of the Green Belt (to check unrestricted sprawl, to prevent neighbouring towns from merging, to assist in safeguarding the countryside from encroachment, preserving the setting and special character of historic towns and to assist in urban regeneration) are considered within the assessment. The conclusions of that assessment are		

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								that the potential conflict of the proposed development of site WA/BE/3 with aspects of Green Belt policy will be limited to the site level and in the wider landscape context the proposed development will not conflict with the purpose or function of the Green Belt.		
Stanmore Properties Ltd	LPPS830	Policy 7A		No	Yes	Justified	The identification of Hurcott ADR south as Green Gap is unjustified and makes the Plan unsound. I act on behalf of Stanmore Properties Ltd who own land designated as BW/4 Hurcott ADR south. The site owned by my client was previously allocated as part of Core Housing Site BW/4 for 200 houses and is now proposed instead as Green Gap (Policy 30.12). The land in their ownership is shown on location plan 2639-100 Rev B. The northern part is in another ownership and now has planning permission for 91 houses. The southern part however, previously a Core Housing Site, has now been changed with no consultation with the owner to a Green Gap under Policy 30.12 but there is no evidence to justify this change. Policy 30.12 and the reasoned justification paragraphs 30.30 to 30.32 say the southern part of the ADR will be allocated as green gap and not released for development “in order to protect the Hurcott Pastures SSSI and the setting of the historic Hurcott Village.” The evidence base does not provide any justification to demonstrate any adverse impact of development to the SSSI or the setting of Hurcott village. There is no evidence to support why this approach is necessary. There are no other green gaps anywhere in the district and the policy has no basis. Evidence Base Location Plan 2639-100 Rev B shows Hurcott Pastures SSSI to be on the southern part of my client’s ownership and south of the proposed Green Gap. Hurcott village is at the junction of Hurcott Road and Hurcott Lane about 130m south of the proposed Green Gap. There is an extensive evidence base to the Pre-Submission Plan that includes: • Heritage Impact Assessment Oct 2018 • Preliminary Ecological Appraisal June 2018 • Sustainability Appraisal Appendix B (HELAA forms) • Worcestershire Sub-Regional Green Infrastructure Framework - Kidderminster East Strategic Development Corridor Concept Plan version 1.3	deleting Policy 30.12 to remove the Green Gap designation • the site reallocated for housing under Policy 30 Kidderminster Town - Table 30.0.1 Allocated Sites in Kidderminster - BW/4 Stourbridge Road ADR - BW/4 • consequential amendments to Policy 7A Strategic Green Belt Review - Hurcott ADR.	No	

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							• Site Selection Paper Oct 2018 None of these present any compelling evidence to support the conclusion that development of this site would damage the Hurcott Pastures SSSI or the setting of Hurcott village, rather the reports refer to constraints and recommend stand-off zones to Hurcott Lane might be needed if housing takes place. • Heritage Impact Assessment – Appendix A3 includes an assessment of site BW/4 and makes reference to the southern part of the site as a sensitive landscape setting for Hurcott village, Mill and pool. It accepts mitigation by way of "Retention of dense tree screening to the north of Hurcott Mill and pool will be essential to retain the historic character of the village and setting." It does not say the site should remain undeveloped or open to justify Green Gap; Furthermore, the significance of the heritage assets identified as WSM51479 and WSM08170 is stated as negligible and medium/low respectively; • Preliminary Ecological Appraisal refers in the event the site is developed, to at least a 50m stand off from Hurcott Lane and the southern site boundary (ie north of the SSSI on the attached Location Plan) but does not say development should be restricted on the rest of the site for any ecological reason; • Sustainability Appraisal is neutral in its assessment; • Green Infrastructure Framework suggests standoffs to Hurcott Lane; • Site selection paper refers to 'potential' adverse hydrology on Hurcott Pastures SSSI which is dry pasture. The District Council have been unable to produce any evidence of adverse impact. The evidence base lends no support for a designation as Green Gap to protect SSSI or heritage assets. The designation is unsound and is not justified by the evidence. It should be removed and the site reallocated for housing.			
Gillespie Gaynor	LPPS959	7A		No		Justified Consistent with National Policy	1. **BACKGROUND** <u>Call for Sites and HELAA</u> 1.1 In 2015, the land at Captains, Bromsgrove Road, was submitted into the call for sites and representations were made into the issues and options consultation. The subsequent HELAA in 2016 included the site as being 1.23ha of Brownfield land and 1.75ha of Greenfield land (at this time the site was both Captains and the adjacent property the	Site WFR/ST/1 should be included as a core housing site.	Yes	To update the inspector on further ecological and tree surveys carried of at the appropriate times of the year to inform how much of the site is available for development whilst protecting and improving biodiversity.

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							Lodge), with the total site capable of providing 135 dwellings (ref: WFR/ST/1). The HELAA commented that the Brownfield elements of the site could deliver housing within 5 years, as this would not require land to be taken out of the Green Belt. The remainder of the site was considered potentially developable after 5 years, as this land would need to be released from the Green Belt. <u>Green Belt Review April 2017</u> 1.2 In April 2017, the Amec Foster Wheeler Green Belt Review concluded that "the site makes only a limited contribution to Green Belt purposes, being well bounded with limited visual connection". 1.3 With regards to the effect of development on openness, this Review concluded that "development would extend the current built edge of Kidderminster along the A448 but this would not be substantial and would be visually contained by substantial boundary vegetation". 1.4 In more detail, the Review concluded: To check the unrestricted sprawl of large built-up areas — Limited contribution: development on this site would create a logical rounding off of the built edge ofKidderminster without creating sprawl along theA448 To prevent neighbouring towns merging into one another — Limited contribution: development would not contribute to coalescence To assist in safeguarding the countryside from encroachment — Limited contribution: the bounded character of the site means that development would not create a sense of encroachment into open countryside To preserve the setting and special character of historic towns — Limited contribution: the site has no role in this respect Overall assessment of contribution to Green Belt purposes — Limited contribution: The site makes only a limited contribution to Green Belt purposes, being well bounded with limited visual connection.			

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							Development would extend the current built edge of Kidderminster along the A448 but this would not be substantial and would be visually contained by substantial boundary vegetation (p.36 Appendix C Green Belt Review April 2017) 1.5 This assessment of the site was unaltered in the Green Belt Review Part II Site Analysis published in May 2018 <u>Preferred Options Sustainability Appraisal Report May 2017</u> 1.6 In Appendix G.4 Local Plan Review Site Testing Tables – Kidderminster East, this site WFR/ST/1 was identified as having "the potential to enhance the landscape by developing land that currently has a minor negative impact". The site was recognised as involving the redevelopment of a Brownfield site and "thus development has the potential for a significant positive effect". 1.7 Of the 13 sustainability appraisal objectives used (two of which were divided into two scores within each objective), this site scored "major positive" (development would resolve an existing sustainability problem) in three of the objectives, "minor positive" (no sustainability constraints) in six of the categories, "neutral" in four of the objectives, N/A in one objective and a "minor negative" (potential sustainability issues, mitigation and/or negotiation possible) in the objective "to maintain the integrity of the Green Belt within the District". 1.8 This site did not score any "major negative" (problematic and improbable due to sustainability issues, mitigation is likely to be difficult and/or expensive) or any "absolute constraints". 1.9 Objective 9 considered the objective of conserving and enhancing the District's biodiversity and geodiversity and development of this site was considered "neutral" in its potential to adversely affect nationally protected sites and was considered "minor positive" in its potential to adversely affect locally protected sites. <u>Local Plan Review Preferred Options (June 2017)</u>			

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							1.10 Consequently, in the preferred options publication June 2017, site WFR/ST/1 was the only potential site south of A448 Bromsgrove Road identified as a core housing site (i.e. a site common to both options A and B). Sites north of A448 Bromsgrove Road were also identified as core housing sites. Other sites south of Bromsgrove Road, surrounding this site WFR/ST/1 were included as option A housing sites only. In essence, option B sites were those identified as core housing sites and option A housing sites were proposed as additional to these option B core housing sites. The option A sites would require additional infrastructure. Clearly, WFR/ST/1 was seen as a site that could be brought forwards to meet housing needs without greater investment in infrastructure than required to meet the other core housing sites included in option B. <u>Preliminary Ecological Appraisal of potentially ecologically sensitive sites on WFDC's list of sites for allocation in the 2018 Local Plan (June 2018)</u> 1.11 The appraisal identified features of biodiversity significance that could affect development of this site: • Wet woodland adjoining the Captain's and Stanklyn Pools and Spennells Valley LWS • Drain and associated vegetation • Tall hedgerows – although the Leyland cypress trees are of very low ecological value, they do form substantial corridors across the site, along which bats and birds might commute. *Recommendations were therefore:* • Buffer the wet woodland and Captain's Pool by at least 50m and design the site to draw footfall away from/prevent access to the sensitive LWS receptor • Ensure that surface water is appropriately managed away from the wet woodland • A management plan should be produced to eradicate non-native species from the site (see section 4.1.2), including the Leyland cypress trees – although bat surveys should be carried out first • Extensive bat presence/absence and activity surveys, covering buildings and the wider site should be carried out to find out how bats use it for commuting and foraging. This information should be used to inform site layout and mitigation and compensation			

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							measures for bats, including fulfilling the connectivity function (if any) of the Leyland cypress hedgerows. • Full botanical surveys of the grassland are recommended when it has not been recently mown, to check for plant species of interest (e.g. the S41 species recorded nearby by WBRC). <u>Sustainability appraisal of the Pre-Submission Publication Draft Wyre Forest District</u> <u>Local Plan published October 2018</u> 1.12 This site receives a "neutral" score for local services and facilities need to travel and sustainable travel modes, economy and employment and for community and settlement identities. It scores "minor positive compared to the current situation – no sustainability constraints" for housing needs of all. For soil and land, water resources and quality, flood risk, landscape and townscape and for Green Belt, it scores a "minor negative compared to the current situation – potential sustainability issues, mitigation possible". For historic environment it scores "neutral uncertain" and for biodiversity and geodiversity it scores "major negative compared to the current situation – problematic sustainability issues, mitigation difficult and/or expensive". <u>Local Plan Review Preferred Options (June 2017) summary of consultation responses</u> <u>published October 2018</u> 1.13 The WFDC officer comments for this site read: "This site is not proposed for allocation in this local plan. Limited development may still be possible based on existing footprint of development. Key issue is impact on ancient woodland and pools and streams complex which would severely limit the developable area." (Appendix 3b Kidderminster Urban Extensions) 2. **MERITS OF THIS SITE** 2.1 The site is in sole ownership and there are no known legal constraints to development of this site, which could be delivered within five years. There is the potential to provide a minimum of 70 dwellings on the site, subject to further ecological survey work being carried out, which may show that more land is available for development than can be			

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							confirmed at this time. Housing mix, including affordable housing, would be in accordance with current policies. The site has mains water and sewerage, electricity and gas, with good access onto the public highway A448 Bromsgrove Road. There are no known abnormal costs, other than a programme of works to provide ecological and biodiversity enhancement, and no known issues that would influence economic viability. There are no bad neighbour uses; the current low- key caravan storage use would cease. The site lies in a sustainable location, adjacent to the existing Spennells residential development. 2.2 Development of this site meets all of the relevant principles in proposed policy 6B Locating New Development, as it provides for accessible housing to meet objectively assessed needs, it makes effective re-use of accessible, available and environmentally acceptable Brownfield land, it will safeguard and enhance the open countryside, it will have limited effect on the openness of the Green Belt and will be development adjacent to the urban area, where both housing needs and accessibility to more effective public service provision are greatest. 2.3 Until the publication of the Council's preliminary ecological appraisal (PEA) in June 2018, this site WFR/ST/1 was judged by the Council to be a good site for housing development. The Council has acknowledged that there will need to be Green Belt releases to meet projected housing needs and this site has been determined to make only a limited contribution to the purposes of land being included in the Green Belt. It was considered that development on this site would have limited effect on the openness of the Green Belt. 2.4 There is a local desire, expressed in the preferred options publication draft, that the number and scale of Greenfield sites taken for development should be as small as possible. The major part of this site (2.1ha) is Brownfield (see plan 8797-101 attached as **Appendix 1** to these submissions) and development on this site would thus meet this objective. 2.5 The Preferred Options Sustainability Appraisal recognised that there was potential to enhance the landscape by developing land that currently has a minor negative impact. 3. **NEW EVIDENCE**			

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							3.1 None of the recommendations in the Council's PEA prevent development of this site, they simply seek to protect and enhance the existing value of some parts of the site through measures to buffer the wet woodland and Captain's Pool by at least 50m, restrict public access, manage surface water appropriately, and carry out standard tree, protected species and botanical surveys to inform the site development 3.2 It is, unfortunately, the wrong time of year to carry out any detailed survey work of the site. Nonetheless, Swift Ecology were commissioned to provide an initial assessment of the relevant documents and a site visit was made in early December. Swift Ecology have since produced an ecological constraints and opportunities plan (ECOP attached as **Appendix 2** to these submissions). <u>Summary of Swift Ecology's initial comments:</u> *Main constraints:* • The WCC/Severnscape Preliminary Ecological Appraisal (2018) report recommends a minimum 50 m buffer of the designated Local Wildlife Site and ancient woodland. It may well be possible to reduce this buffer; this would need to be informed by further ecology surveys and information on the feasibility and effectiveness of mitigation for issues such as drainage, lighting, pollution and disturbance in order to demonstrate that the LWS will not be adversely impacted. At this stage we don't have enough evidence to specify and justify a smaller buffer, so the ECOP shows the full 50 m buffer to the LWS/ancient woodland. • Captain's Pool: recommend scrub planting in the buffer (whatever the size of the buffer) to limit public access to the pool and thereby protect wetland birds and their breeding/wintering habitats; drainage/pollution and lighting issues will also need consideration. • Ancient woodland: the buffer distance needs to be evidence-based (see guidance from The Woodland Trust). The key issues in determining the extent of the final buffer will be the ecological importance of the woodland and the site hydrology/drainage design. The ecological importance of the woodland can only be established through further survey (the optimal time for woodland botanical surveys is April-			

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							May). • Brook in southern part of the site. This will need buffering and could potentially be enhanced (see opportunities below). Minimum 5 m buffer along the banks based on EA guidance for minor watercourses has been included in the ECOP. • The mature cypress hedges provide a good network across the site and might be important for foraging/commuting bats. Further bat surveys would be needed to establish their importance. • The grassland across the site will need a more detailed survey in summer (May- July) to determine its importance. From the preliminary survey it seems unlikely that the grassland will be of high quality; however, if some or all of the grassland *is* identified as priority habitat, mitigation will be needed, although there is likely to be an opportunity to retain grassland/provide mitigation within a 50 m buffer of the LWS (to be determined by further survey). • The ecology buffer should be free from development and also have restricted or managed public access, with no public access to the designated sites (i.e. no footpaths or cycle paths to the woodland or pool). • Further surveys to inform detailed design (for example great crested newts (of which there are records within 1 km), bats roosts in buildings/trees, breeding birds, otter & water vole) could identify further mitigation requirements; however, it is likely that these could be incorporated into the ecology buffer of the LWS/ancient woodland. *Main opportunities:* • The southern part of the site is a pinch-point in an otherwise green corridor, most of which is designated as a Local Wildlife Site. Restoration of the woodland that was lost to the caravan area, and extension towards Captain's Pool with new planting/habitat creation in the buffers and along the brook, would provide biodiversity enhancements, strengthen the link between Local Wildlife Site areas and contribute to GI targets for the district. • If the cypress hedges are not found to be of high importance for bats, replacing them with native tree planting across the site would be an improvement for biodiversity.			

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							• There may be opportunities for SUDs scheme to deliver biodiversity benefits. • Habitat creation in GI (including buffers) could also deliver biodiversity benefits. 3.3 With the maximum ecology buffer of 50 m from the LWS and Ancient Woodland, this leaves approximately 2.6 ha (excluding The Lodge) as 'developable area' purely considering currently known ecological constraints. It may well be possible to increase this area if we can negotiate a reduced ecology buffer with the LPA following further ecology & hydrology survey and consideration of all the possible impacts to produce a sensitive development design. 4. **POTENTIAL FOR DEVELOPMENT** 4.1 The ECOP shows the maximum buffers that would be required until detailed survey work can be carried out which may well indicate that these buffer areas could be reduced. In other words, this plan takes a precautionary approach regarding the amount and location of land available for development. 4.2 Plan 8797-102 Proposed Developable Area (attached as **Appendix 3** to these submissions) shows that 2.6ha of land could be developed to meet housing needs, using the maximum buffer areas to protect ecological constraints. Of this 2.6ha development land, 2.1ha is Brownfield. 4.3 The property known as the Lodge has been excluded from the plans attached to this submission. The owners of the Lodge have not instructed Stansgate Planning Ltd to act for them and so the availability of this site for development is uncertain. 4.4 As can be seen from the proposed developable area plan, there are many advantages to allocating this site for development. Development of this site would enable a comprehensive management plan to be prepared and maintained for the land between the development site and Captain's Pool: this land includes existing woodland TPO, a Local Wildlife Site and an area of Ancient Woodland. The existing incursion of a substantial area of hard standing into the more sensitive areas of the site would be removed and the land restored to provide greater ecological and biodiversity value. The historic boathouse in the SW corner of the site, which has been identified as an undesignated			

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							heritage asset, could be protected within the proposed buffer zone. Whilst public access would need to be controlled to protect the ecological and biodiversity value of the land and the areas of water, there is no reason why the land management plan for the site could not allow some public access into some parts of the land. Without development, the cost of providing, maintaining and managing these areas for the benefit of the local community cannot be covered and these benefits will not be realised. <u>Sustainability appraisal of the pre-submission publication draft (October 2018)</u> 4.5 On the basis of the new ecological information now received, it is clear that the site should not be scored "major negative" for **biodiversity and geodiversity**. It should in fact be scored "major positive compared to the current situation – development would resolve an existing sustainability problem". 4.6 With regards to **soil and land**, whilst some of the site is Greenfield, from the preliminary ecological survey it seems unlikely that the grassland will be of high quality. The land is not being used for any active agricultural use, it is simply mown and maintained. This should not be scored "minor negative" and should be scored neutral. 4.7 Looking at the **water resources and quality, flood risk** objective, the revised proposals for the site, based upon the evidence from Swift Ecology, would leave areas of the site at risk of surface water flooding within the undeveloped parts of the site. Water here would be managed in accordance with more detailed surveys and ecological management proposals that would follow at a more detailed stage of the development process. The water cycle study flags up capacity issues but this is not unusual for many development sites and is not a reason to preclude development of this land. 4.8 Turning **to landscape and townscape**, the notes recognise that the site is well screened from the A448 and considers that there is potential for adverse impact on views from the adjoining housing estate. There would be no adverse impact on these views. The boundary between these houses and this site is heavily screened year- round by Leyland Cypress that have grown to a height greater than the houses. There are, at most, limited views into this site and, if there are views, these are currently harmed by the			

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							substantial areas of hardstanding, the uncompleted extension works to the property at Captains as well as the storage of much domestic paraphernalia and ancillary buildings, and the storage of caravans. There is potential therefore to improve the outlook for any properties that can obtain views into this site through the removal of the existing buildings, caravans and clutter, their replacement with an attractive housing scheme and through the restoration and improvement of the woodland and wildlife areas beyond. This score should therefore be amended from "minor negative" to "major positive compared to the current situation – development would resolve an existing sustainability problem", now that the Swift Ecology report has demonstrated that development on this site is realistic, subject to standard surveys being carried out. 5. **THE TESTS OF SOUNDNESS** <u>Inclusion within Kidderminster East Policy 32</u> 5.1 Paragraph 35 of the Framework 2018 requires, amongst other things, that a plan be "justified": that there is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. The plan should also be "consistent with national policy": enabling the delivery of sustainable development in accordance with policies in the Framework. 5.2 In light of the ecological assessment carried out by Swift Ecology, site WFR/ST/1 has been wrongly assessed and should not be excluded from the core housing sites identified by the Council. The objection raised by the Council which has led to this site's exclusion from the pre-submission publication draft document has been overcome by the evidence provided by Swift Ecology. In other words, the site is not constrained in the manner concluded by the Council. Based upon the evidence now available to the Council, exclusion of this site would not be justified and fails to meet the guidance in paragraph 35 of the Framework 2018. In this regard the proposed plan is unsound. 5.3 With regards to the removal of the land from the Green Belt, this site meets the considerations set out in paragraph 138 of the Framework. The evidence provided by Swift Ecology demonstrates that "the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility			

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							of remaining Green Belt" (para.138). 5.4 The pre-submission publication draft includes a summary of preferred options responses (pp.29-30). These responses included support for re-utilisation of Brownfield land and support for concentrating development in and around the main settlements. There was concern for loss of agricultural land and wildlife. 5.5 In light of the evidence from Swift Ecology, concerns regarding impact upon wildlife and valuable agricultural land can be allayed. The amount of land proposed for development (2.6ha) is only slightly more than the existing area of Brownfield land (2.1ha) and so development of this site, which is next to the main settlement in the District, would meet a key local objective to minimise development of Greenfield sites. In light of the evidence from Swift Ecology, this site should be developed in preference to any Greenfield sites within the Green Belt. 5.6 Whilst Council officers' comments have suggested that limited development may still be possible based on existing footprint of development, it would be better to allocate the site to make a more efficient use of land and to enable the "trade" of Brownfield land within the site for Greenfield land within the site for the best outcomes in landscape/townscape and in ecology and biodiversity impacts. <u>Reserved Housing Sites</u> 5.7 This site should be included in the list of reserved housing sites to meet longer term needs, ahead of the sites identified. Paragraph 7.5 (p.50-51 of the pre-submission publication draft) confirms that the ADR (area of development restraint) sites safeguarded in Policy 7B are all Greenfield sites (land removed from the Green Belt to meet longer-term needs). In looking to identify sites, the accepted hierarchy is: • Brownfield sites within urban areas • Greenfield sites within urban areas • Brownfield sites within the Green Belt • Greenfield sites within the Green Belt 5.8 This is confirmed by paragraph 6.16 of the pre-submission publication draft which advises that the urban			

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							areas of the District have the greatest housing needs and are locations where the cost of public service delivery is relatively low. "Accordingly, the bulk of development needs that cannot be met via Brownfield land (including Brownfield land in the Green Belt) will be via Greenfield land release adjacent to the main towns, especially Kidderminster". 5.9 In light of the evidence from Swift Ecology, that ecological and biodiversity matters do not preclude development of this site, site WFR/ST/1 should be included in the list of reserved housing sites, as a Brownfield site in the Green Belt, with no known constraints to development ahead of the inclusion of any Greenfield sites in the Green Belt. The exclusion of this site is neither justified nor is it consistent with national policy and therefore fails to meet paragraphs 35 and 139 of the Framework 2018 and the plan, in this regard, is unsound. 6. **CONCLUSIONS** 6.1 The site was included as a core housing site, with the potential to enhance the landscape by developing land that currently has a minor negative impact within the Green Belt, in the Council's preferred options document. 6.2 The Council's PEA resulted in the Council removing this site from the pre-submission publication draft. 6.3 The new evidence provided by Swift Ecology shows that the Council's position is not justified and, in this regard, the plan is therefore not sound. 6.4 The site should be included within the final version of the pre-submission document sent to the Planning Inspectorate as a site that should be developed for housing. If it is not to be included as land that is deliverable now then it should be removed from the Green Belt and included as a site within the reserved housing sites list, ahead of any Greenfield sites.			
Taylor Wimpey West Midlands	LPPS1002	Policy 7A		Yes			Comberton Road Kidderminster The Council recognises the need to release land from the Green Belt in order to meet the identified housing needs and other development requirements across the Plan period. It is noted that the strategic allocation on the eastern edge of Kidderminster urban area is identified as an area to be		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of

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							removed from the Green Belt. This is supported by Taylor Wimpey as 'sound.' A Strategic Review of the Green Belt (September 2016) prepared by Amec Foster Wheeler forms part of the Local Plan Review evidence base. The Green Belt Review assesses a number of parcels of land against the five purposes of the Green Belt as set out within the NPPF. Sites are identified as either making a 'significant contribution', a 'contribution' or a 'limited contribution' to the Green Belt purposes. The exceptional circumstances for releasing land from the Green Belt of increased housing demand coupled with a reduced level of brownfield land opportunities and a tightly drawn Green Belt boundary restricting the ability to deliver sustainable growth, are endorsed by Taylor Wimpey. The NPPF 2018, at paragraph 138, is clear that when reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. Kidderminster is the most sustainable location for growth within the District and the town is completely enveloped by Green Belt. Whilst brownfield sites may represent development opportunities within the existing urban area, this source of supply is diminishing or becoming increasingly difficult to bring forward for development due to identified barriers, therefore Green Belt release is necessary to support the sustainable growth of the town and to ensure identified issues and objectives are met within the plan period. Further consideration of the role of the Green Belt to the east of Kidderminster is set out later in these representations.			the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	LPPS1020	Policy 7A		Yes			Land at Rectory Lane Stourport The Council recognises the need to release land from the Green Belt in order to meet the identified housing needs and other development requirements across the Plan period. It is noted that the strategic allocation on the eastern edge of Kidderminster urban area is identified as an area to be removed from the Green Belt. This is supported by Taylor Wimpey as 'sound.' A Strategic Review of the Green Belt (September 2016) prepared by Amec Foster Wheeler forms part of the Local Plan Review evidence base. The Green Belt Review assesses a number of parcels of land against the five purposes of the Green Belt as set out within the NPPF.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall

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							Sites are identified as either making a 'significant contribution', a 'contribution' or a 'limited contribution' to the Green Belt purposes. The exceptional circumstances for releasing land from the Green Belt of increased housing demand coupled with a reduced level of brownfield land opportunities and a tightly drawn Green Belt boundary restricting the ability to deliver sustainable growth, are endorsed by Taylor Wimpey. The NPPF 2018, at paragraph 138, is clear that when reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. Kidderminster is the most sustainable location for growth within the District and the town is completely enveloped by Green Belt. Whilst brownfield sites may represent development opportunities within the existing urban area, this source of supply is diminishing or becoming increasingly difficult to bring forward for development due to identified barriers, therefore Green Belt release is necessary to support the sustainable growth of the town and to ensure identified issues and objectives are met within the plan period.			spatial strategy contained therein.
Taylor Wimpey West Midlands	LPPS1036	Policy 7A		Yes			Land at Bewdley Road North Stourport The Council recognises the need to release land from the Green Belt in order to meet the identified housing needs and other development requirements across the Plan period. It is noted that the strategic allocation on the eastern edge of Kidderminster urban area is identified as an area to be removed from the Green Belt. This is supported by Taylor Wimpey as 'sound.' A Strategic Review of the Green Belt (September 2016) prepared by Amec Foster Wheeler forms part of the Local Plan Review evidence base. The Green Belt Review assesses a number of parcels of land against the five purposes of the Green Belt as set out within the NPPF. Sites are identified as either making a 'significant contribution', a 'contribution' or a 'limited contribution' to the Green Belt purposes. The exceptional circumstances for releasing land from the Green Belt of increased housing demand coupled with a reduced level of brownfield land opportunities and a tightly drawn Green Belt boundary restricting the ability to deliver sustainable growth, are endorsed by Taylor Wimpey. The NPPF 2018, at paragraph 138, is clear that when reviewing Green Belt boundaries, local planning authorities		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

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							should take account of the need to promote sustainable patterns of development. Kidderminster is the most sustainable location for growth within the District and the town is completely enveloped by Green Belt. Whilst brownfield sites may represent development opportunities within the existing urban area, this source of supply is diminishing or becoming increasingly difficult to bring forward for development due to identified barriers, therefore Green Belt release is necessary to support the sustainable growth of the town and to ensure identified issues and objectives are met within the plan period.			
Bareford David	LPPS122	7A	Yes	No	No	Positively Prepared	The Lea Castle site has increased from that in 2017 without justification. There is no mention of loss of Green Belt land in Caunsall for the houses planned there.		Yes	As before
Hagley Parish Council	LPPS228	7A	Yes	No	Yes	Justified Consistent with National Policy	This objection follows from sundry others. We object to the removal of Lea Castle East, West, and North and the two sites along Husum Way from the Green Belt. Furthermore, since the remainder of the Hurcott ADR is being designated as a Green Gap under policy 30.12, it would be better if it were restored to the Green Belt. See also separate 7A-Omitted sites objection.	To reverse the removal of Lea Castle Village Development and the eastern edge of the Kidderminster Urban Area. Restore Hurcott ADR to the Green Belt.	Yes	To amplify as necessary this objection and natural justice, ensuring that the inspector hears both sides of the argument.
Nicholls Christopher	LPPS302	.Policy 7A	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Green Belt Conflict of interest by AMEC by undertaking reviews and now advising Homes England. Not consistent with National Policy in particular NPPF Para 136 relating to exceptional circumstances. Lea Castle Village No evidence that there is a need for a development of this size. Infrastructure highlighted in 31.1 is extremely limited - certainly not sufficient for 1400 homes.	Green Belt recent studies need to be revisited. An independent planning enquiry is required to establish whether exceptional need has been met. Infrastructure needs to be re-examined. The proposed community facility is insufficient. 'Potentially a G.P Surgery' needs to be examined.	Yes	I consider it absolutely essential that a more local perspective is given on the impact that a new larger village will have upon both the residents of Cookley and residents of the proposed development. Also it is necessary that the Green Belt is preserved.
Murphy Alison	LPPS445	Policy 7A	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	1. Para 7.7 - Green Belt should only be altered under exceptional circumstances - I do not believe this is the case in this circumstance. 2. The field along the A449 (between the copse behind The Crescent and the Wolverley Crossroads) was not included in the Local Plan Review - this is the first time it has been included in any consultation. 3. There is a conflict of interest whereby AMEC Foster Wheeler (GBR 16/17) are now consultants for the	The Green Belt needs to be reviewed again as the consultant has a conflict of interest.	No	

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							development of this site (Homes England).			
Plant Ben	LPPS528	Policy 7A	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Section 7.7 of NPPF clearly states that "Green Belt boundaries should only be altered in exceptional circumstances". As there are several Brown Belt areas within the Wyre Forest that would benefit from redevelopment this is not exceptional cirucmstances. The additional plans to develop fields adjacent to the A449 just outside Cookley was never included in the original Wyre Forest review so myself and other local residents were not consulted. Amec Foster Wheeler who worked on the Green Belt Review 2016/17 also represented Homes England who plan to develop Green Belt land as part of the Local Plan - surely this is a "Conflict of Interest".	So that it is fair and ethical the Local Plan must be scrapped and started again using unbiased consultants and clear consultation of residents.	Yes	To make sure it is fair and ethical and that local residents are consulted properly.
Association of Black Country Authorities	LPPS765	Policy 7A	No	No	No	Positively Prepared Effective Consistent with National Policy	Policy 7A has identified two areas of development restraint (ADR's) that could be released for residential development. Additionally, Policy 78 has identified "Reserved Housing Sites", should the Council fail to provide a 5 year housing supply or meet the housing delivery test. We request that Wyre Forest should first look to allocate these sites for housing during the Plan period to help meet the unmet housing needs of the Black Country.		Yes	The Black Country Authorities would wish to explain to the Inspector the current position regarding unmet housing need.
Kidderminster Harriers Football Club	LPPS774	Policy 7A-Strategic Green Belt Review		No		Positively Prepared Effective	Wish to change Policy 7A-Strategic Green Belt Review, to add reference to proposed allocation for the relocated Kidderminster Harriers and removal of the site from the Green Belt. This will be to recognise the need for the relocation to support sports, educational, and associated facilities for the town which cannot be provided elsewhere. Green Belt boundaries may be reviewed in order to accommodate all development needs and not confined to housing, as per NPPF paragraphs 136-137.	Change Policy 7A-Strategic Green Belt Review, to add reference to proposed allocation for the relocated Kidderminster Harriers and removal of the site from the Green Belt.	Yes	This is to be decided at a later stage in the plan making process.
Euro Property Investments Ltd.	LPPS785	Policy 7A	Yes	Yes	Yes		In light of the guidance in the Framework at paragraph 136 we agree that there are exceptional circumstances that justify the amendments to the Green Belt that are proposed within the Pre-Submission Draft of the Local Plan. The Council, have to date, been able to progress and adopt previous Local Plans due to the identification in earlier plans of safeguarded land and Areas of Development Restraint. This has enabled the Council to meet its development needs to date on land that is not in the Green Belt. Going forward, these are now no longer available and therefore, the Council would be unable to meet its development needs without		Yes	We are promoting one of the four draft residential allocations in Bewdley and therefore key to the delivery of new housing in the settlement

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							considering the use of Green Belt land. In our view, these constitute exceptional circumstances and are sufficient to warrant the amendments to the Green Belt that are now proposed. Specifically, we support the removal of land at Stourport Road, Bewdley, which is identified as a draft housing allocation known as the Stourport Triangle for removal from the Green Belt. Rolling back the Green Belt in this location will enable a new strong defensible boundary to be formed, which would accord with the guidance in paragraph 139.			
Richborough Estates	LPPS819	Policy 7A Strategic Green Belt Review		Yes			Policy 7A- Strategic Green Belt Review is sound. Green Belt release is necessary to ensure that the plan is positively prepared and the district housing needs are met in full.		Yes	We would welcome the opportunity to attend the examination hearing sessions to discuss the issues we have identified which affect the soundness of the plan, and to meet with the Council to discuss the above evidence base when it is further evolved.
Marmaris Investments Ltd.	LPPS843	Policy 7A	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	The proposed sites for release from the Green Belt do not follow the conclusions of the Green Belt study, and the land at Station Drive Blakedown should be proposed for removal from the Green Belt in line with the recommendations and conclusions of the Green Belt review.		Yes	Green Belt / Transportation / Housing issues are important areas of the plan and inclusion in the debate at the examination will be useful to the Inspector
Gladman Developments Ltd	LPPS863	Policy 7A	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	It is noted that the above policy seeks to amend Green Belt boundaries to enable development to the north of Kidderminster to enable the Lea Castle Village development and the eastern edge of Kidderminster urban area together with smaller scale Green Belt releases in the market towns and villages. Whilst Gladman do not object to the principle of releasing land from the Green Belt which no longer meets the purposes of Green Belt as defined by national policy, we do not consider the evidence provided by the Council is sufficient to justify the decisions arrived at. Indeed, to pass such a high bar in terms of demonstrating 'exceptional circumstances' the evidence which underpins Green Belt release must be substantive and detailed.		Yes	To discuss the issues raised in our written submissions.

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							The Government's position on Green Belt release has recently been reaffirmed in the Revised Framework. Paragraph 137 states: *'Before concluding that exceptional circumstances existing to justify changes to boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:* *a) Makes as much use as possible of suitable brownfield sites and underutilised land;* *b) Optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and* *c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.'* As previously stated, Gladman do not in principle object to authorities undertaking Green Belt release, however, the requirements of the Revised Framework set out above is clear that the evidence which underpins the plan and the decisions taken has not occurred. Gladman originally instructed FPCR to undertake a Green Belt Review which provided a thorough baseline desktop and site based analysis of the twelve sites identified within *Green Belt Review – Part II Sites* report for Kidderminster. A copy of this report can be found in Appendix 2. Following publication of the Council's updated 2018 Green Belt Review evidence base, Gladman requested FPCR to update this work and to provide a review of the sites identified within the update. This update can be found in Appendix 3. It is apparent that there are inconsistencies when comparing the findings of the report with the recommendations then made for parcels which should be brought forward for draft			

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							allocation. Indeed, the Council's Green Belt Review comments that sites WFR/WC/32 (Lea Castle East) and WFR/WC/34 (Land north of Lea Castle Hospital) are: - *"sites where the impacts are judged to be significant and damaging to the Green Belt, through their likely effect on openness" and are "sensitive gateway sites where even modest development would have a disproportionate effect both on the function of the Green Belt (principally in terms sprawl and effect on setting), but also on the wider perception of openness reflecting their prominence".* Yet this land is now proposed as part of the Lea Castle Hospital allocation. It is therefore unclear why the Council has decided to go against its own evidence base and allocate land which will have a significant impact on Green Belt. The sites which have been assessed in this report make a more significant contribution overall and have been brought forward whilst sites which have been assessed to make a less significant contribution to the Green Belt have not. There are also clear opportunities to meet housing needs outside of Green Belt areas, two such examples are discussed later in these representations. The Revised Framework is clear in its approach that exceptional circumstances must be demonstrated before releasing land from the Green Belt and that all other options for development should be fully explored. Accordingly, Gladman object to the decision to release land from the Green Belt on the basis that it is justified given that alternative options have not been fully explored and no discussion with neighbouring authorities has been undertaken through a SoCG.			
Kidderminster Civic Society	LPPS884	7A	Yes	No	Yes	Justified	Whilst our key objectives of high standards in planning and architecture, promotion of education/history of the area, preservation, development and improvement of features of historic and public interest are met, we do have concerns about the 2% Green Belt land taken for housing, east of Offmore, which includes prime agriculture A2 and 3A production land which benefits from a historic irrigation system installed by Lord Foley.	Saving 2% of Green Belt Land East of Offmore (or a good part of) by consideration given to fill this by other "other reserved for housing building" sites, OC/5 site especially should be saved from development because of the historical relevance to Lord Foley and, and also, that it contains prime agriculture land currently being farmed.	Yes	As an executive committee member and secretary designate of Kidderminster Civic Society, it is imperative that this society speaks up for the area it represents and the people who live in it.

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								Land available for use could be land at Sion Hill school site, land at Captains on Comberton Road, land off Wolverley Road adjacent to Marlpool Gardens estate and land off Ferndale Estate.		
Pre-submission Anonymous	LPPS940	7A Strategic Green Belt Review					Regarding your future planning for the area. I am all in favour of the improvement of any BROWN field sites in a manner that would that would be compatible with the area concerned. I am however not happy where GREEN field sites are pillaged for whatever reason and every effort should be made to avoid this situation as once they are used they are never to return to a GREEN field site. There is however a situation where this could be excepted WITHIN the boundaries of the three towns [NOT OUTSIDE OF THEM]. iowever parks should also be introduced within those said boundaries. Regarding town planning I feel on the present trend that, no amount of money thrown at trying to revive shops that have closed down will be successful in the long term. This therefore requires the thought of living accommodation within the town it's self, possible in flat dwelling form. The crown house situation should be revisited as no doubt it is. I have felt that the building although not a pleasant one, which could be rectified, should be used. As no doubt it is construction wise, in good health. The projected closure of the Grange again in Sutton park road is surely not advantages to its continuing changing resident and the reason why they are there. These type of places release pressure we are told in bed blocking at Hospitals with its ongoing effect on other members of the public. This is one of the areas where crown house could be used. It is also noted that the council recently invested in office space in the black country. Could it be turned into flats for whoever. We hear of homeless people and those said to be sleeping in the streets. I of course do not know how prevalent it is in the three town area.			
Wood John	LPPS513	Policy 7A	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Not legally compliant - Amec Foster Wheeler carried out the Green Belt Review in 2016/17 for Wyre Forest District Council. They have advised Homes England on Lea Castle since 2017. This is a clear conflict of interest. Not consistent with National Policy: Policy 7.7 of the Local Plan and NPPF paragraph 136 states that Green Belt	I believe that, as the Wyre Forest District Council Green Belt Review cannot be considered independent because of Amec's conflict of interest. I believe that the Green Belt review needs to be undertaken again with an independent consultant or at the very least subject to	Yes	I feel very strongly about the Local Plan and the way in which WFDC have not complied with the letter or the spirit of Green Belt policy. I also feel that the plan has been positively prepared in this respect

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							boundaries should be only altered where exceptional circumstances are fully evidence and justified. WFDC have not demonstrated exceptional use. Not consistent with National Policy - Policy 31 - WFDC have treated all the villages and hamlets within the Parish differently. Wolverley has been termed washed-over Green Belt but two sites in the Green Belt have been listed for potential development. Cookley is regarded is surrounded by Green Belt but an extremely large development will be allowed in the Green Belt. There are no such distinctions for Green Belt in National Policy. Not positively prepared - Policy 31.1 Lea Castle Village Vision Paragraph 1 - 'Affordable housing is expected to be in line with Policy 8b'. As there is no longer any obligation to put affordable housing on the Lea Castle Hospital Site (17/0205/OUTL) - 'it is accepted that provision is likely to be lower in the central part of the site'. This means that in order to meet that the remainder of the site should have well in excess of 25%. The Homes England Lea Castle Wider Site Plan shows a predominance of Lower Density and Medium Density homes - to be added to the Lower Density and Medium Density homes that predominate in approval (17/0205/OUTL) - without any area of Higher Density or Affordable Homes identified on this plan at all. Duty to co-operate - As a Parish Councillor I have spoken to a number of Parishioners (in excess of 100) did not receive any notification of the Consultation meetings on the Local Plan, this means that in my view, Wyre Forest District Council have failed in their duty to co-operate.	independent review. Green Belt boundaries should be only altered where exceptional circumstances and need to demonstrate this with independent overview. Also the WFDC estimate of Housing Ned over 20 years needs careful scrutiny. National Green Belt policy must be adhered to, it is not acceptable for Wyre Forest Council to play fast and loose with designations of Green Belt. All the North Worcestershire villages should have the same Green Belt criteria applied to them: Cookley, Caunsall and Wolverley. All development within the plan should conform to national guidelines of 30% affordable housing and meet local need. Using approval (17/0205/OUTL) - to negate this is not acceptable. The consultation for the Local Plan should be restarted with all homes in Wyre Forest being informed of consultation meetings with more than one consultation. In each location with times of opening to suit access from maximum numbers of the population. 3-7pm on a Friday meant that a number of working people within the Cookley and Caunsall parishes told me they were unable to attend as they were not home in time.		with the treatment of different rural villages being so inconsistent even though they lie in Green Belt. The consultation been rushed and badly advertised. As a Parish Councillor I can represent the view of the parishioners of Cookley and Caunsall.
Gillespie Gaynor	LPPS961	7B		No		Justified Consistent with National Policy	1. **BACKGROUND** Call for Sites and HELAA 1.1 In 2015, the land at Captains, Bromsgrove Road, was submitted into the call for sites and representations were made into the issues and options consultation. The subsequent HELAA in 2016 included the site as being 1.23ha of Brownfield land and 1.75ha of Greenfield land (at this time the site was both Captains and the adjacent property the Lodge), with the total site capable of providing 135 dwellings	Site WFR/ST/1 should be included as a core housing site.	Yes	To update the inspector on further ecological and tree surveys carried of at the appropriate times of the year to inform how much of the site is available for development whilst protecting and improving biodiversity.

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							(ref: WFR/ST/1). The HELAA commented that the Brownfield elements of the site could deliver housing within 5 years, as this would not require land to be taken out of the Green Belt. The remainder of the site was considered potentially developable after 5 years, as this land would need to be released from the Green Belt. <u>Green Belt Review April 2017</u> 1.2 In April 2017, the Amec Foster Wheeler Green Belt Review concluded that "the site makes only a limited contribution to Green Belt purposes, being well bounded with limited visual connection". 1.3 With regards to the effect of development on openness, this Review concluded that "development would extend the current built edge of Kidderminster along the A448 but this would not be substantial and would be visually contained by substantial boundary vegetation". 1.4 In more detail, the Review concluded: To check the unrestricted sprawl of large built-upareas: Limited contribution: development on this site would create a logical rounding off of the built edge of Kidderminster without creating sprawl along theA448 To prevent neighbouring towns merging into one another: Limited contribution: development would not contribute to coalescence To assist in safeguarding the countryside from encroachment: Limited contribution: the bounded character of the site means that development would not create a sense of encroachment into open countryside To preserve the setting and special character of historic towns: Limited contribution: the site has no role in this respect Overall assessment of contribution to Green Belt purposes: Limited contribution: The site makes only a limited contribution to Green Belt purposes, being well bounded with limited visual connection. Development would extend the			

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							current built edge of Kidderminster along the A448 but this would not be substantial and would be visually contained by substantial boundary vegetation (p.36 Appendix C Green Belt Review April 2017) 1.5 This assessment of the site was unaltered in the Green Belt Review Part II Site Analysis published in May 2018 <u>Preferred Options Sustainability Appraisal Report May 2017</u> 1.6 In Appendix G.4 Local Plan Review Site Testing Tables – Kidderminster East, this site WFR/ST/1 was identified as having "the potential to enhance the landscape by developing land that currently has a minor negative impact". The site was recognised as involving the redevelopment of a Brownfield site and "thus development has the potential for a significant positive effect". 1.7 Of the 13 sustainability appraisal objectives used (two of which were divided into two scores within each objective), this site scored "major positive" (development would resolve an existing sustainability problem) in three of the objectives, "minor positive" (no sustainability constraints) in six of the categories, "neutral" in four of the objectives, N/A in one objective and a "minor negative" (potential sustainability issues, mitigation and/or negotiation possible) in the objective "to maintain the integrity of the Green Belt within the District". 1.8 This site did not score any "major negative" (problematic and improbable due to sustainability issues, mitigation is likely to be difficult and/or expensive) or any "absolute constraints". 1.9 Objective 9 considered the objective of conserving and enhancing the District's biodiversity and geodiversity and development of this site was considered "neutral" in its potential to adversely affect nationally protected sites and was considered "minor positive" in its potential to adversely affect locally protected sites. <u>Local Plan Review Preferred Options (June 2017)</u>			

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							1.10 Consequently, in the preferred options publication June 2017, site WFR/ST/1 was the only potential site south of A448 Bromsgrove Road identified as a core housing site (i.e. a site common to both options A and B). Sites north of A448 Bromsgrove Road were also identified as core housing sites. Other sites south of Bromsgrove Road, surrounding this site WFR/ST/1 were included as option A housing sites only. In essence, option B sites were those identified as core housing sites and option A housing sites were proposed as additional to these option B core housing sites. The option A sites would require additional infrastructure. Clearly, WFR/ST/1 was seen as a site that could be brought forwards to meet housing needs without greater investment in infrastructure than required to meet the other core housing sites included in option B. <u>Preliminary Ecological Appraisal of potentially ecologically sensitive sites on WFDC's list of sites for allocation in the 2018 Local Plan (June 2018)</u> 1.11 The appraisal identified features of biodiversity significance that could affect development of this site: • Wet woodland adjoining the Captain's and Stanklyn Pools and Spennells Valley LWS • Drain and associated vegetation • Tall hedgerows – although the Leyland cypress trees are of very low ecological value, they do form substantial corridors across the site, along which bats and birds might commute. *Recommendations were therefore:* • Buffer the wet woodland and Captain's Pool by at least 50m and design the site to draw footfall away from/prevent access to the sensitive LWS receptor • Ensure that surface water is appropriately managed away from the wet woodland • A management plan should be produced to eradicate non-native species from the site (see section 4.1.2), including the Leyland cypress trees – although bat surveys should be carried out first • Extensive bat presence/absence and activity surveys, covering buildings and the wider site should be carried out to find out how bats use it for commuting and foraging. This information should be used to inform site layout and mitigation and compensation			

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							measures for bats, including fulfilling the connectivity function (if any) of the Leyland cypress hedgerows. • Full botanical surveys of the grassland are recommended when it has not been recently mown, to check for plant species of interest (e.g. the S41 species recorded nearby by WBRC). <u>Sustainability appraisal of the Pre-Submission Publication Draft Wyre Forest District</u> <u>Local Plan published October 2018</u> 1.12 This site receives a "neutral" score for local services and facilities need to travel and sustainable travel modes, economy and employment and for community and settlement identities. It scores "minor positive compared to the current situation – no sustainability constraints" for housing needs of all. For soil and land, water resources and quality, flood risk, landscape and townscape and for Green Belt, it scores a "minor negative compared to the current situation – potential sustainability issues, mitigation possible". For historic environment it scores "neutral uncertain" and for biodiversity and geodiversity it scores "major negative compared to the current situation – problematic sustainability issues, mitigation difficult and/or expensive". <u>Local Plan Review Preferred Options (June 2017) summary of consultation responses</u> <u>published October 2018</u> 1.13 The WFDC officer comments for this site read: "This site is not proposed for allocation in this local plan. Limited development may still be possible based on existing footprint of development. Key issue is impact on ancient woodland and pools and streams complex which would severely limit the developable area." (Appendix 3b Kidderminster Urban Extensions) 2. **MERITS OF THIS SITE** 2.1 The site is in sole ownership and there are no known legal constraints to development of this site, which could be delivered within five years. There is the potential to provide a minimum of 70 dwellings on the site, subject to further ecological survey work being carried out, which may show that more land is available for development than can be			

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							confirmed at this time. Housing mix, including affordable housing, would be in accordance with current policies. The site has mains water and sewerage, electricity and gas, with good access onto the public highway A448 Bromsgrove Road. There are no known abnormal costs, other than a programme of works to provide ecological and biodiversity enhancement, and no known issues that would influence economic viability. There are no bad neighbour uses; the current low- key caravan storage use would cease. The site lies in a sustainable location, adjacent to the existing Spennells residential development. 2.2 Development of this site meets all of the relevant principles in proposed policy 6B Locating New Development, as it provides for accessible housing to meet objectively assessed needs, it makes effective re-use of accessible, available and environmentally acceptable Brownfield land, it will safeguard and enhance the open countryside, it will have limited effect on the openness of the Green Belt and will be development adjacent to the urban area, where both housing needs and accessibility to more effective public service provision are greatest. 2.3 Until the publication of the Council's preliminary ecological appraisal (PEA) in June 2018, this site WFR/ST/1 was judged by the Council to be a good site for housing development. The Council has acknowledged that there will need to be Green Belt releases to meet projected housing needs and this site has been determined to make only a limited contribution to the purposes of land being included in the Green Belt. It was considered that development on this site would have limited effect on the openness of the Green Belt. 2.4 There is a local desire, expressed in the preferred options publication draft, that the number and scale of Greenfield sites taken for development should be as small as possible. The major part of this site (2.1ha) is Brownfield (see plan 8797-101 attached as **Appendix 1** to these submissions) and development on this site would thus meet this objective. 2.5 The Preferred Options Sustainability Appraisal recognised that there was potential to enhance the landscape by developing land that currently has a minor negative impact. 3. **NEW EVIDENCE**			

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							3.1 None of the recommendations in the Council's PEA prevent development of this site, they simply seek to protect and enhance the existing value of some parts of the site through measures to buffer the wet woodland and Captain's Pool by at least 50m, restrict public access, manage surface water appropriately, and carry out standard tree, protected species and botanical surveys to inform the site development 3.2 It is, unfortunately, the wrong time of year to carry out any detailed survey work of the site. Nonetheless, Swift Ecology were commissioned to provide an initial assessment of the relevant documents and a site visit was made in early December. Swift Ecology have since produced an ecological constraints and opportunities plan (ECOP attached as **Appendix 2** to these submissions). <u>Summary of Swift Ecology's initial comments:</u> *Main constraints:* • The WCC/Severnscape Preliminary Ecological Appraisal (2018) report recommends a minimum 50 m buffer of the designated Local Wildlife Site and ancient woodland. It may well be possible to reduce this buffer; this would need to be informed by further ecology surveys and information on the feasibility and effectiveness of mitigation for issues such as drainage, lighting, pollution and disturbance in order to demonstrate that the LWS will not be adversely impacted. At this stage we don't have enough evidence to specify and justify a smaller buffer, so the ECOP shows the full 50 m buffer to the LWS/ancient woodland. • Captain's Pool: recommend scrub planting in the buffer (whatever the size of the buffer) to limit public access to the pool and thereby protect wetland birds and their breeding/wintering habitats; drainage/pollution and lighting issues will also need consideration. • Ancient woodland: the buffer distance needs to be evidence-based (see guidance from The Woodland Trust). The key issues in determining the extent of the final buffer will be the ecological importance of the woodland and the site hydrology/drainage design. The ecological importance of the woodland can only be established through further survey (the optimal time for woodland botanical surveys is April-			

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							May). • Brook in southern part of the site. This will need buffering and could potentially be enhanced (see opportunities below). Minimum 5 m buffer along the banks based on EA guidance for minor watercourses has been included in the ECOP. • The mature cypress hedges provide a good network across the site and might be important for foraging/commuting bats. Further bat surveys would be needed to establish their importance. • The grassland across the site will need a more detailed survey in summer (May- July) to determine its importance. From the preliminary survey it seems unlikely that the grassland will be of high quality; however, if some or all of the grassland *is* identified as priority habitat, mitigation will be needed, although there is likely to be an opportunity to retain grassland/provide mitigation within a 50 m buffer of the LWS (to be determined by further survey). • The ecology buffer should be free from development and also have restricted or managed public access, with no public access to the designated sites (i.e. no footpaths or cycle paths to the woodland or pool). • Further surveys to inform detailed design (for example great crested newts (of which there are records within 1 km), bats roosts in buildings/trees, breeding birds, otter & water vole) could identify further mitigation requirements; however, it is likely that these could be incorporated into the ecology buffer of the LWS/ancient woodland. *Main opportunities:* • The southern part of the site is a pinch-point in an otherwise green corridor, most of which is designated as a Local Wildlife Site. Restoration of the woodland that was lost to the caravan area, and extension towards Captain's Pool with new planting/habitat creation in the buffers and along the brook, would provide biodiversity enhancements, strengthen the link between Local Wildlife Site areas and contribute to GI targets for the district. • If the cypress hedges are not found to be of high importance for bats, replacing them with native tree planting across the site would be an improvement for biodiversity.			

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							• There may be opportunities for SUDs scheme to deliver biodiversity benefits. • Habitat creation in GI (including buffers) could also deliver biodiversity benefits. 3.3 With the maximum ecology buffer of 50 m from the LWS and Ancient Woodland, this leaves approximately 2.6 ha (excluding The Lodge) as 'developable area' purely considering currently known ecological constraints. It may well be possible to increase this area if we can negotiate a reduced ecology buffer with the LPA following further ecology & hydrology survey and consideration of all the possible impacts to produce a sensitive development design. 4. **POTENTIAL FOR DEVELOPMENT** 4.1 The ECOP shows the maximum buffers that would be required until detailed survey work can be carried out which may well indicate that these buffer areas could be reduced. In other words, this plan takes a precautionary approach regarding the amount and location of land available for development. 4.2 Plan 8797-102 Proposed Developable Area (attached as **Appendix 3** to these submissions) shows that 2.6ha of land could be developed to meet housing needs, using the maximum buffer areas to protect ecological constraints. Of this 2.6ha development land, 2.1ha is Brownfield. 4.3 The property known as the Lodge has been excluded from the plans attached to this submission. The owners of the Lodge have not instructed Stansgate Planning Ltd to act for them and so the availability of this site for development is uncertain. 4.4 As can be seen from the proposed developable area plan, there are many advantages to allocating this site for development. Development of this site would enable a comprehensive management plan to be prepared and maintained for the land between the development site and Captain's Pool: this land includes existing woodland TPO, a Local Wildlife Site and an area of Ancient Woodland. The existing incursion of a substantial area of hard standing into the more sensitive areas of the site would be removed and the land restored to provide greater ecological and biodiversity value. The historic boathouse in the SW corner of the site, which has been identified as an undesignated			

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							heritage asset, could be protected within the proposed buffer zone. Whilst public access would need to be controlled to protect the ecological and biodiversity value of the land and the areas of water, there is no reason why the land management plan for the site could not allow some public access into some parts of the land. Without development, the cost of providing, maintaining and managing these areas for the benefit of the local community cannot be covered and these benefits will not be realised. <u>Sustainability appraisal of the pre-submission publication draft (October 2018)</u> 4.5 On the basis of the new ecological information now received, it is clear that the site should not be scored "major negative" for **biodiversity and geodiversity**. It should in fact be scored "major positive compared to the current situation – development would resolve an existing sustainability problem". 4.6 With regards to **soil and land**, whilst some of the site is Greenfield, from the preliminary ecological survey it seems unlikely that the grassland will be of high quality. The land is not being used for any active agricultural use, it is simply mown and maintained. This should not be scored "minor negative" and should be scored neutral. 4.7 Looking at the **water resources and quality, flood risk** objective, the revised proposals for the site, based upon the evidence from Swift Ecology, would leave areas of the site at risk of surface water flooding within the undeveloped parts of the site. Water here would be managed in accordance with more detailed surveys and ecological management proposals that would follow at a more detailed stage of the development process. The water cycle study flags up capacity issues but this is not unusual for many development sites and is not a reason to preclude development of this land. 4.8 Turning **to landscape and townscape**, the notes recognise that the site is well screened from the A448 and considers that there is potential for adverse impact on views from the adjoining housing estate. There would be no adverse impact on these views. The boundary between these houses and this site is heavily screened year- round by Leyland Cypress that have grown to a height greater than the houses. There are, at most, limited views into this site and, if there are views, these are currently harmed by the			

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							substantial areas of hardstanding, the uncompleted extension works to the property at Captains as well as the storage of much domestic paraphernalia and ancillary buildings, and the storage of caravans. There is potential therefore to improve the outlook for any properties that can obtain views into this site through the removal of the existing buildings, caravans and clutter, their replacement with an attractive housing scheme and through the restoration and improvement of the woodland and wildlife areas beyond. This score should therefore be amended from "minor negative" to "major positive compared to the current situation – development would resolve an existing sustainability problem", now that the Swift Ecology report has demonstrated that development on this site is realistic, subject to standard surveys being carried out. 5. **THE TESTS OF SOUNDNESS** <u>Inclusion within Kidderminster East Policy 32</u> 5.1 Paragraph 35 of the Framework 2018 requires, amongst other things, that a plan be "justified": that there is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. The plan should also be "consistent with national policy": enabling the delivery of sustainable development in accordance with policies in the Framework. 5.2 In light of the ecological assessment carried out by Swift Ecology, site WFR/ST/1 has been wrongly assessed and should not be excluded from the core housing sites identified by the Council. The objection raised by the Council which has led to this site's exclusion from the pre-submission publication draft document has been overcome by the evidence provided by Swift Ecology. In other words, the site is not constrained in the manner concluded by the Council. Based upon the evidence now available to the Council, exclusion of this site would not be justified and fails to meet the guidance in paragraph 35 of the Framework 2018. In this regard the proposed plan is unsound. 5.3 With regards to the removal of the land from the Green Belt, this site meets the considerations set out in paragraph 138 of the Framework. The evidence provided by Swift Ecology demonstrates that "the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility			

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							of remaining Green Belt" (para.138). 5.4 The pre-submission publication draft includes a summary of preferred options responses (pp.29-30). These responses included support for re-utilisation of Brownfield land and support for concentrating development in and around the main settlements. There was concern for loss of agricultural land and wildlife. 5.5 In light of the evidence from Swift Ecology, concerns regarding impact upon wildlife and valuable agricultural land can be allayed. The amount of land proposed for development (2.6ha) is only slightly more than the existing area of Brownfield land (2.1ha) and so development of this site, which is next to the main settlement in the District, would meet a key local objective to minimise development of Greenfield sites. In light of the evidence from Swift Ecology, this site should be developed in preference to any Greenfield sites within the Green Belt. 5.6 Whilst Council officers' comments have suggested that limited development may still be possible based on existing footprint of development, it would be better to allocate the site to make a more efficient use of land and to enable the "trade" of Brownfield land within the site for Greenfield land within the site for the best outcomes in landscape/townscape and in ecology and biodiversity impacts. <u>Reserved Housing Sites</u> 5.7 This site should be included in the list of reserved housing sites to meet longer term needs, ahead of the sites identified. Paragraph 7.5 (p.50-51 of the pre-submission publication draft) confirms that the ADR (area of development restraint) sites safeguarded in Policy 7B are all Greenfield sites (land removed from the Green Belt to meet longer-term needs). In looking to identify sites, the accepted hierarchy is: • Brownfield sites within urban areas • Greenfield sites within urban areas • Brownfield sites within the Green Belt • Greenfield sites within the Green Belt 5.8 This is confirmed by paragraph 6.16 of the pre-submission publication draft which advises that the urban			

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							areas of the District have the greatest housing needs and are locations where the cost of public service delivery is relatively low. "Accordingly, the bulk of development needs that cannot be met via Brownfield land (including Brownfield land in the Green Belt) will be via Greenfield land release adjacent to the main towns, especially Kidderminster". 5.9 In light of the evidence from Swift Ecology, that ecological and biodiversity matters do not preclude development of this site, site WFR/ST/1 should be included in the list of reserved housing sites, as a Brownfield site in the Green Belt, with no known constraints to development ahead of the inclusion of any Greenfield sites in the Green Belt. The exclusion of this site is neither justified nor is it consistent with national policy and therefore fails to meet paragraphs 35 and 139 of the Framework 2018 and the plan, in this regard, is unsound. 6. **CONCLUSIONS** 6.1 The site was included as a core housing site, with the potential to enhance the landscape by developing land that currently has a minor negative impact within the Green Belt, in the Council's preferred options document. 6.2 The Council's PEA resulted in the Council removing this site from the pre-submission publication draft. 6.3 The new evidence provided by Swift Ecology shows that the Council's position is not justified and, in this regard, the plan is therefore not sound. 6.4 The site should be included within the final version of the pre-submission document sent to the Planning Inspectorate as a site that should be developed for housing. If it is not to be included as land that is deliverable now then it should be removed from the Green Belt and included as a site within the reserved housing sites list, ahead of any Greenfield sites.			
Taylor Wimpey West Midlands	LPPS1005	Policy 7B		No		Effective Consistent with National Policy	Comberton Road Kidderminster Taylor Wimpey does not support the approach set out in respect of Areas of Development Restraint within the District. The NPPF 2018 states that it is crucial for Local Plans to "look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and	Safeguarded land should be identified around Kidderminster including land south of Comberton Road in the control of Taylor Wimpey.	Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of

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							opportunities, such as those arising from major improvements to infrastructure." Therefore, it is necessary for the Local Plan to consider future development needs within the District beyond the proposed Plan period (2036). Whilst there is currently no fixed guidance on the length of time beyond the proposed Plan period an LPA consider for through the plan making process, the NPPF at paragraph 139 states that 'safeguarded land' should be identified, where necessary, in order to meet longer term development needs stretching well beyond the plan period. It also states that plans should "be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period." Policy 7B identifies a very limited number of safeguarded sites that would only yield less than 150 homes in total. This equates to approximately half a year of supply for the District. Four of the five sites are safeguarded sites identified in the current Local Plan. In determining the appropriate quantum of safeguarded land to identify within Wyre Forest District it is necessary to consider the local context, including: the opportunities for meeting longer term development needs outside of the Green Belt beyond the plan period; and, the likely level of future housing and employment that will be required to meet the needs of the District beyond the plan period including cross boundary pressures. In terms of future development sites available or likely to become available within Wyre Forest, it needs to be recognised that over two thirds of the District currently lies within the West Midlands Green Belt. The most sustainable settlement in the District, Kidderminster, which is the focus for development within the current plan period, is completed enveloped by Green Belt. Within Kidderminster there are no, or very few opportunities, that exist to meet longer term development needs outside of the West Midlands Green Belt, other than the limited brownfield opportunities that may arise. In the longer-term Kidderminster will need to retain a key role in providing new homes to meet the objectively assessed housing needs of the District, including identified needs for affordable homes. With the existing Green Belt drawn tightly around the existing settlement boundary, it is necessary to release land from the Green Belt in the longer term to ensure future needs can be met and the vitality of services and facilities can be maximised in the longer term. Whilst the draft Local Plan proposes to roll forward a degree			the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

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							of safeguarded land, this level and location of provision is ineffective in ensuring long term development needs can be met and Green Belt boundaries will endure in the long term. To ensure Kidderminster continues to play an important role in meeting longer term housing needs and to ensure an enduring Green Belt boundary beyond the plan period, safeguarded land should be identified around Kidderminster within this Local Plan. Land to the south of Comberton Road within the control of Taylor Wimpey would represent a logical location for development beyond the plan period and should be safeguarded accordingly.			
Taylor Wimpey West Midlands	LPPS1021	Policy 7B		No		Effective Consistent with National Policy	Land at Rectory Lane Stourport Taylor Wimpey does not support the approach set out in respect of Areas of Development Restraint within the District. The NPPF 2018 states that it is crucial for Local Plans to "look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements to infrastructure." Therefore, it is necessary for the Local Plan to consider future development needs within the District beyond the proposed Plan period (2036). Whilst there is currently no fixed guidance on the length of time beyond the proposed Plan period an LPA consider for through the plan making process, the NPPF at paragraph 139 states that 'safeguarded land' should be identified, where necessary, in order to meet longer term development needs **stretching well beyond the plan period**. It also states that plans should "*be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period*." Policy 7B identifies a very limited number of safeguarded sites that would only yield less than 150 homes in total. This equates to approximately half a year of supply for the District. Four of the five sites are safeguarded sites identified in the current Local Plan. In determining the appropriate quantum of safeguarded land to identify within Wyre Forest District it is necessary to consider the local context, including: the opportunities for meeting longer term development needs outside of the Green Belt beyond the plan period; and, the likely level of future housing and employment that will be required to meet the needs of the District beyond the plan period including cross boundary pressures.	Safeguarded land should be identified around Kidderminster including land south of Comberton Road in the control of Taylor Wimpey.	Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

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							In terms of future development sites available or likely to become available within Wyre Forest, it needs to be recognised that over two thirds of the District currently lies within the West Midlands Green Belt. The most sustainable settlement in the District, Kidderminster, which is the focus for development within the current plan period, is completed enveloped by Green Belt. Within Kidderminster there are no, or very few opportunities, that exist to meet longer term development needs outside of the West Midlands Green Belt, other than the limited brownfield opportunities that may arise. In the longer-term Kidderminster will need to retain a key role in providing new homes to meet the objectively assessed housing needs of the District, including identified needs for affordable homes. With the existing Green Belt drawn tightly around the existing settlement boundary, it is necessary to release land from the Green Belt in the longer term to ensure future needs can be met and the vitality of services and facilities can be maximised in the longer term. Whilst the draft Local Plan proposes to roll forward a degree of safeguarded land, this level and location of provision is ineffective in ensuring long term development needs can be met and Green Belt boundaries will endure in the long term. To ensure Kidderminster continues to play an important role in meeting longer term housing needs and to ensure an enduring Green Belt boundary beyond the plan period, safeguarded land should be identified around Kidderminster within this Local Plan. Land to the south of Comberton Road within the control of Taylor Wimpey would represent a logical location for development beyond the plan period and should be safeguarded accordingly.			
Taylor Wimpey West Midlands	LPPS1037	Policy 7B		No		Effective Consistent with National Policy	Land at Bewdley Road North Stourport Taylor Wimpey does not support the approach set out in respect of Areas of Development Restraint within the District. The NPPF 2018 states that it is crucial for Local Plans to "look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements to infrastructure." Therefore, it is necessary for the Local Plan to consider future development needs within the District beyond the proposed Plan period (2036). Whilst there is currently no fixed guidance on the length of time beyond the proposed Plan period an LPA consider for through the plan making process, the NPPF at paragraph 139	Land at Bewdley Road North Stourport should ne removed from the Green Belt and either allocated in this plan or safeguarded for future development.	Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained

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							states that 'safeguarded land' should be identified, where necessary, in order to meet longer term development needs **stretching well beyond the plan period**. It also states that plans should "*be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period*." Policy 7B identifies a very limited number of safeguarded sites that would only yield less than 150 homes in total. This equates to approximately half a year of supply for the District. Four of the five sites are safeguarded sites identified in the current Local Plan. In determining the appropriate quantum of safeguarded land to identify within Wyre Forest District it is necessary to consider the local context, including: the opportunities for meeting longer term development needs outside of the Green Belt beyond the plan period; and, the likely level of future housing and employment that will be required to meet the needs of the District beyond the plan period including cross boundary pressures. In terms of future development sites available or likely to become available within Wyre Forest, it needs to be recognised that over two thirds of the District currently lies within the West Midlands Green Belt. The most sustainable settlement in the District, Kidderminster, which is the focus for development within the current plan period, is completed enveloped by Green Belt. Similarly, Stourport-on-Severn is also enveloped by the Green Belt, with the Green Belt terminating at its southern boundary. Within Kidderminster and Stourport there are no, or very few opportunities, that exist to meet longer term development needs outside of the West Midlands Green Belt, other than the limited brownfield opportunities that may arise. In the longer-term Kidderminster and Stourport will need to retain a key role in providing new homes to meet the objectively assessed housing needs of the District, including identified needs for affordable homes. With the existing Green Belt drawn tightly around the existing settlement boundary, it is necessary to release land from the Green Belt in the longer term to ensure future needs can be met and the vitality of services and facilities can be maximised in the longer term. Whilst the draft Local Plan proposes to roll forward a degree of safeguarded land, this level and location of provision is ineffective in ensuring long term development needs can be met and Green Belt boundaries will endure in the long term. To ensure Kidderminster and Stourport-on-Severn continue to play an important role in meeting longer term housing needs and to ensure an enduring Green Belt boundary			therein.

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							beyond the plan period, safeguarded land should be identified around Kidderminster within this Local Plan. Land to the south of Comberton Road within the control of Taylor Wimpey would represent a logical location for development beyond the plan period and should be safeguarded accordingly. Similarly, should the Council consider that Land at Bewdley Road North is not suitable for development during the plan period, it should nevertheless be removed from the Green Belt and safeguarded for longer-term development needs.			
Association of Black Country Authorities	LPPS766	Policy 7B	No	No	No	Positively Prepared Effective Consistent with National Policy	Policy 78 has identified "Reserved Housing Sites", should the Council fail to provide a 5 year housing supply or meet the housing delivery test. We request that Wyre Forest should first look to allocate these sites for housing during the Plan period to help meet the unmet housing needs of the Black Country.		Yes	The Black Country Authorities would wish to explain to the Inspector the current position regarding unmet housing need.
Marmaris Investments Ltd.	LPPS844	Policy 7B	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	arising from the findings of the Green Belt review, the land at Station Drive, Blakedown should be notated as a *"Reserved Housing Site"* for longer term development needs (if it is not allocated for development within the plan period). The policy should be amended to remove reference to "*Very Special Circumstances*" in 2, as the sites will be removed from the Green Belt by this local plan. The remaining parts of the policy as drafted will provide sufficient policy guidance as to when and if these sites should be brought forward for development.	The policy should be amended to remove reference to "Very Special Circumstances" in 2, as the sites will be removed from the Green Belt by this local plan. Land at Station Drive, Blakedown should be notated as a “Reserved Housing Site” for longer term development needs (if it is not allocated for development within the plan period).	Yes	Green Belt / Transportation / Housing issues are important areas of the plan and inclusion in the debate at the examination will be useful to the Inspector
Gladman Developments Ltd	LPPS864	Policy 7B	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Whilst the principle of safeguarded land is noted, Gladman do not consider it appropriate to allocate safeguarded land given the issues raised in response to Policy 7A above as there are available sites beyond the Green Belt, such as those identified in section 7 of these representations, that are able to come forward and assist the Council in meeting its development needs without resulting in the loss Green Belt. Only when all options have been fully exhausted should the Council consider releasing land from the Green Belt. Notwithstanding this, Paragraph 139(d) of the revised Framework is clear that when preparing a Local Plan, the Plan should make clear that the safeguarded land is not allocated for development at the present time and that planning permission for permanent development should only be		Yes	To discuss the issues raised in our written submissions.

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							granted following an update to a plan which proposed the development i.e. a Local Plan Review. If the Council is unable to demonstrate a 5 year housing land supply it should not be seeking to allocate reserve housing sites in response to an undersupply of housing as these sites are clearly safeguarded land that can only come forward through a future plan review. Given that the Council recognise that further land may be required should the Council be unable to demonstrate a five year housing land supply, then further flexibility should be built into the Plan which allows for consideration of sustainable greenfield sites to come forward at any time when a supply cannot be demonstrated.			
Home Builders Federation (HBF)	LPPS907	Policy 7B		No	No	Justified Effective Consistent with National Policy	If post consultation the Council's overall HLS or 5 YHLS change the HBF may wish to submit further comments of the soundness of the Local Plan in any subsequent written Examination Statements or orally at Hearing Sessions.	If post consultation the Council's overall HLS or 5 YHLS change the HBF may wish to submit further comments of the soundness of the Local Plan in any subsequent written Examination Statements or orally at Hearing Sessions.	Yes	
Luxford Graham	LPPS80	7.1, 7A, 7.6, 7.7, 7.8, 7.9, 7.10, 7.12, 7.13, 7.14, 7.16	Yes	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	One of the very important roles of the Green Belt is that it provides physical separation of our three towns. The Plan pays insufficient regard to the NPPF requirement for maintaining Green Belts and this key function. Removal of the Green Belt on the Wribbenhall side of the A456 Bewdley By-Pass will seriously weaken this role. With the sites that have now been allocated for housing on the Wribbenhall side and with the proposed Water Park and outline proposals for Hotel and Conference Centre on the Safari Park side, I believe this presents a radical change in the perceived rural setting of our towns, giving a much more urban feel and thereby a significant weakening of the Green Belt that will remain on the Safari Park side of the road only. If no alternative sites are available and these sites must be used to meet the required local housing need then effective measures should be incorporated in development proposals to mitigate this loss including additional tree screening and landscaping, reduced size, density and types of developments as well as appropriate designs and choice of materials.	Effective measures should be incorporated in development proposals to mitigate this important loss of Green Belt including additional tree screening and landscaping, reduced size, density and types of developments as well as appropriate designs	No	
Mayman Nick	LPPS194	7.1	Yes		Yes	Justified	Page 48 of the Plan refers to the stated aims of the Green Belt which include the protection of open countryside and prevention of urban sprawl. It is It also states that only "exceptional circumstances" justify Green Belt release for development purposes. It is particularly disappointing to note that of the 4 housing development sites proposed for Bewdley, 3 require such release. I argue elsewhere (sections 6 and Policy 34) that the total number of new dwellings	Release one or two sites only which should be those proposed for Catchem's End and Habberley Road. Given that the Plan envisages that new future householders will be commuting to/from Bewdley, this will minimise traffic disruption, particularly in regard to the schools in Stourport Road which already	Yes	to give personal testimony

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							proposed is not justified and therefore Green Belt release on the scale proposed is not necessary.	cause traffic chaos and is constantly (via a local Residents' Group) being brought to the attention of County Councillors, Police and the school Heads.		
Nicholls Kay	LPPS9	Policy 7a	No	No	No	Consistent with National Policy	NPPF states that Green Belt has various purposes. With respect to the Lea Castle Village: The newly identified parcels of land for development at Lea Castle would allow neighbouring areas to merge into one another (namely Broadwaters and Cookley). The positioning of such a large number of dwellings on the Lea Castle site would mean the urban regeneration of Kidderminster would likely not happen. Both of which are in contravention of para 80 of NPPF.	Whilst I would agree to the principle of development at Lea Castle, the scale of development now proposed would seem excessive with a severe impact on the Green Belt. The previous options report set out proposals for up to 950 dwellings which has now increased to 1400 homes. Therefore, the extent of development should be reduced to minimise the encroachment into the Green Belt and to maximise the gap between suburbs of Kidderminster and Cookley village to keep these areas distinct. In place of this, serious consideration should be given to revitalising derelict and unused brownfield sites. These sites would also provide better access to facilities and transport links already in place.	No	
Luxford Graham	LPPS79	7.1, 7A, 7.6, 7.7, 7.8, 7.9, 7.10, 7.12, 7.13, 7.14, 7.16	Yes	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	Wribbenhall side and with the proposed Water Park and outline proposals for Hotel and Conference Centre on the Safari Park side, I believe this presents a radical change in the perceived rural setting of our towns, giving a much more urban feel and thereby a significant weakening of the Green Belt that will remain on the Safari Park side of the road only. If no alternative sites are available and these sites must be used to meet the required local housing need then effective measures should be incorporated in development proposals to mitigate this loss including additional tree screening and landscaping, reduced size, density and types of developments as well as appropriate designs and choice of material	Effective measures should be incorporated in development proposals to mitigate this important loss of Green Belt including additional tree screening and landscaping, reduced size, density and types of developments as well as appropriate designs and choice of material	No	
Davies Jill	LPPS8	The removal of the Hurcott ADR status	Yes	Yes	Yes		Modifications proposed.	I believe the removal of the Hurcott area from ADR status places it at risk from future housing development. This area currently includes food production land and provides a break between the towns of Blakedown and Hagley and the Kidderminster area. This land is also used for recreation for much needed town dwellers to enjoy a small part of	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								countryside. By removing Hurcott from ADR status, it places it directly as risk of future housing development which, whilst necessary is I believe over-stated in the current plan. Parts of the centre of Kidderminster town are derelict and provide a forward thinking Council an opportunity to redevelop with living spaces which would help rejuvenate the poor old town centre. It seems short sighted to even consider removing food production farmland from use, given the current uncertainty over our Brexit status. We must protect food production for our future and recreational land for future generations.		
Campaign to Protect Rural England	LPPS321	Paragraph 7.6	No	No	Yes	Positively Prepared Effective	Paragraph 7.6 is inconsistent with Policy 7B. The paragraph says that the ADRs will be brought forward, which implies that they will certainly be released. The Policy merely says that they will be "subject to consideration" for release.	The paragraph should be amended: delete: brought forward; substitute: considered.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument. However we would hope this is a minor correction that can be accepted without debate.
Mahoney Kerry	LPPS496	Paragraph 7.7	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Section 7.7 of NPPF states clearly that "Green Belt boundaries should only be altered in exceptional circumstances." If there are numerous Brown Belt areas within the Wyre Forest that would benefit from redevelopment surely this is not exceptional circumstances. The additional plans to develop land adjacent to the A449 just outside Cookley was never outlined in the original Wyre Forest review so my self and may other local residents were not consulted properly. Amex Foster Wheeler a consultant who worked on the Green Belt Review in 2016/17 also represented Homes England (who plan to develop Green Belt land as part of the Local Plan) - surely this is a "Conflict of Interest" which is dishonourable and maybe even be corrupt.	So that it is fair and ethical the Local Plan must be scrapped and started again using unbiased consultants and clear consultation or residents.	Yes	To ensure the process is fair and ethical and that local residents are consulted properly.
Fitter Gary	LPPS524	PoParagraph 7.7	No	No	No	Justified Effective	Does not comply with duty to co-operate as were not informed of the consultation meetings until after they had	Independent agent should re-do the Green Belt review. Policy 8b does not		We were not notified of the consultation meetings.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Consistent with National Policy	taken place! (this happened to many others). Brownfield land should be used instead of Green Belt (ref Green Belt review 7.7 para. 133 The NPPF) - not exceptional circumstances! This will destroy local wildlife and lead to increase in pollution (section 31.3 para 23) The 2 main roads (A451 and A449) are already dangerous roads and have had recent fatalities. The current roads will not cope with an extra 2000+ cars. Country lanes are already horrendous at rush hour. There will be an increase in light pollution for the surrounding area. Surrounding areas and villages will be affected in particular Blakedown and the increased demand at the railway station where parking is inadequate. The Wolverley & Cookley Parish Council Housing Needs Survey showed a demand for starter homes and downsizing homes. This plan will not meet these needs and does not meet national guidelines for affordable housing (policy 8b). There was a conflict of interest with Amec Foster Wheeler used for both Homes England and the Green Belt Review.	meet these specifications or national guidelines on affordable housing.		Discussion of objections from section 6.
Plant Kay	LPPS511	Paragraph 7.7	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The NPP4 (7.7) states that Green Belt land should only be altered in exceptional circumstances and I do not believe this is the case with this local plan. I would like a clear explanation of how this is exceptional circumstances when there is brown belt land prime for development within the boundaries of Wyre Forest. Amec Foster Wheeler who produced the Green Belt review in 2016/17 for Wyre Forest and from 2017 they were consultants to Home England who plan to develop this land. Surely this is a conflict of interest and should not be allowed. The field adjacent to the lights on the A449 has plans to be developed but this was not included on the iriginal local plan review so I was not consulted on this proposal.	To ensure that this process is fair and clear to all local residents that are affected by it, I feel it should be scrapped and started again with a lead consultant who is not biased or has a conflict of interest.	Yes	To ensure it is fair
Humphries Edward	LPPS657	Paragraph 7.13	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The exceptional circumstance given in paragraph 7.13 to justify alteration to the Green Belt boundary is that more homes need to be built in the Wyre Forest District. New homes are built in the district each and every year, so this along cannot be exceptional.	Do not alter the Green Belt boundary or provide an exceptional circumstance to justify alteration.	No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Campaign to Protect Rural England	LPPS323	Policy 8A	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	The grammar of the third paragraph is unclear, meaning that the policy is not positively prepared. This is probably merely bad drafting that can be corrected by a minor amendment. Housing register data (relating to affordable housing needs) is unlikely to provide a satisfactory source for market houisng needs; and this may not be what it is intended. The table appears to add up to 275 not 276. We would comment that under-occupation by older people is likely to be more prevalent in market housing than affordable. Furthermore there is anecdotal evidence that older people wanting to downsize sometimes do not find it easy to find suitable smaller market housing to move to. This is a difficult issue, since compulsion (and even persuasion) is not an available method for freeing up under-occupied larger market houses.	Minor redrafting is needed to clarify what is meant, probably by removing the present reference to the Housing Register and adding a separate sentence concerning that. Make table add up.	Yes	
Barratt Homes West Midlands	LPPS764	Policy 8A-Housing density and mix	Yes	No	Yes	Effective	It should be possible that new developments in town centres can be over 35 dph and this should be supported in this policy.	Policy 8A should be amended to advise that densities of more than 35 dph will be supported provided that high quality design standards are met.		
Persimmon Homes Limited	LPPS809	Policy 8A	Yes	No	Yes	Justified Effective	RPS has made separate representations on the uncertainty of the housing requirement for Wyre Forest over the plan period, following the publication of the Government's consultation on assessing housing need. Policy 8A should be amended in due course to reflect any necessary change in the annual housing figure. It is welcomed that the average 276 dwellings per annum referred to in the Policy is referenced as a minimum figure. There is general support for the aspiration of Policy 8A to ensure that new housing developments are well designed and incorporate a range of different types, tenures and sizes of housing. However, the data included within Table 8.0.1 represents a snapshot in time and the suggested dwelling mix may not be as relevant over the whole plan period. The use of data from the most up-to-date Housing Register at the time of a decision being made, to inform housing mix is broadly supported the Policy should provide greater clarity that the Table is purely for indicative purposes so that the policy is not overly prescriptive regarding housing mix.	On the basis of dwelling size data including the data obtained from the Housing Register, which considers needs over aspirations and includes both general and supported housing needs (including housing needs for older people), Table 8.0.1 provides an indicative view on the overall mix of housing that may be required. The actual mix of housing will be influenced by the context of the site, the market needs and the most up-to-date housing specific to the site.	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination.
Gladman Developments Ltd	LPPS865	Policy 8A	No	No	No	Positively Prepared Justified Effective Consistent with National	Gladman are of the view that the above policy should not seek to rigidly apply generic housing mix and density requirements. Instead, the policy should allow for suitable flexibility in order to be responsive to the individual circumstances of a site, its viability and changes to market trends and conditions over time. As such, the policy should be altered so that it allows for consideration of alternative housing mix and densities which	Policy should be altered to allow for consideration of alternative housing mix and densities which respond to local characteristics of a settlement.	Yes	To discuss the issues raised in our written submissions.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Policy	respond to the local characteristics of a settlement.			
Taylor Wimpey West Midlands	LPPS1038	Policy 8A		No		Effective	Land at Bewdley Road North Stourport The policy sets out a suggested dwelling size and market/ affordable mix using proportions. This is considered to be overly prescriptive given that in different locations there may be an excessive amount of a particular dwelling size and, therefore, any new proposal should not be constrained from delivering an appropriate mix to achieve a better balance overall. However, it is noted that the policy has been updated since the Preferred Option to recognise that Table 8.0.1 provides an 'indicative view' on likely overall dwelling size required and that the actual mix achieved will be influenced by the market. This is supported by Taylor Wimpey. In terms of the average density requirement, this is consistent with the requirements of the NPPF (an average of 35 dwellings per hectare), and it is noted that modifications to the policy have been provided since the Preferred Options document to provide an element of flexibility to allow for new development to reflect local character, which may be at a lower/ higher density depending on the location of the proposal. This is supported by Taylor Wimpey as 'sound.'		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Homes England	LPPS97	Policy 8A	Yes	Yes	Yes		Homes England welcomes the guidance in this policy relating to the potential dwelling mix in the area and is supportive of the reference to this being a suggested mix as this provides sufficient flexibility to accommodate likely changes in mix over the plan period and to accommodate different mixes in different locations. It would be helpful if Table 8.0.1 also included percentages alongside actual numbers. It is noted that the policy makes reference to the anticipation that greenfield developments in town centres will have an average density of 35 dwellings per hectare. It is unclear if this is referring to greenfield developments in all locations, so this would benefit from clarification. The flexibility in this policy is welcomed as there could be reasons why this level of density is not appropriate on all sites.	Homes England welcomes the guidance in this policy relating to the potential dwelling mix in the area and is supportive of the reference to this being a suggested mix as this provides sufficient flexibility to accommodate likely changes in mix over the plan period and to accommodate different mixes in different locations. It would be helpful if Table 8.0.1 also included percentages alongside actual numbers. It is noted that the policy makes reference to the anticipation that greenfield developments in town centres will have an average density of 35 dwellings per hectare. It is unclear if this is referring to greenfield developments in all locations, so this would benefit from clarification. The flexibility in this policy is welcomed as there could be reasons why this level of density is not appropriate on all sites.	Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Taylor Wimpey West Midlands	LPPS642	Policy 8A		No		Effective	Comberton Road Kidderminster The policy sets out a suggested dwelling size and market/		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the

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							affordable mix using proportions. This is considered to be overly prescriptive given that in different locations there may be an excessive amount of a particular dwelling size and, therefore, any new proposal should not be constrained from delivering an appropriate mix to achieve a better balance overall. However, it is noted that the policy has been updated since the Preferred Option to recognise that Table 8.0.1 provides an 'indicative view' on likely overall dwelling size required and that the actual mix achieved will be influenced by the market. This is supported by Taylor Wimpey. In terms of the average density requirement, this is consistent with the requirements of the NPPF (an average of 35 dwellings per hectare), and it is noted that modifications to the policy have been provided since the Preferred Options document to provide an element of flexibility to allow for new development to reflect local character, which may be at a lower/ higher density depending on the location of the proposal. This is supported by Taylor Wimpey as 'sound.'			examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
West Midlands HARP Planning Consortium	LPPS768	Policy 8A		No		Effective Consistent with National Policy	Policy 8A - Housing Density & Mix The wording of Policy 8A indicates that schemes not achieving the average density of 35 dwellings per hectare will be subject to independent viability testing. Such wording is not consistent with national policy, and unlikely to be effective in encouraging development that appropriately responds to either the local context or identified housing needs. Whilst both the 2012 and 2018 NPPF encourage effective use of land and the imposition (in the case of the 2018 Framework) of minimum density standards, it does not encourage the inflexible application of these to the detriment of effective decision making. Applicants looking to bring forward developments with higher or lower densities need clarity as to how policy will be applied, but this must also mean policy is properly justified and viability tested. While the supporting text at paragraph 8.9 indicates that other densities may be acceptable, this does not tie in well with the policy wording. The above proposed modifications would more effectively enable discussion between the Council and applicants where schemes come forward with different densities.	We propose the below wording to better reflect the need for densities that deliver an uplift in development without penalising sustainable development proposals. The make up of individual developments, their design and density will be in sympathy with the development context (e.g. brownfield development in a town centre or greenfield) and existing neighbouring development. It is anticipated that new greenfield developments in town centres will have an average density of 35 dwellings per hectare, unless it can be shown that there are strong reasons why this would be in conflict with the development context and existing neighbouring development area. Individual site characteristics may mean that this level of density is not achievable on all greenfield developments and this will need to be robustly justified and evidenced by the applicant in relation to housing needs and the local context ~~through an independently verified financial viability assessment~~. While the supporting text at paragraph 8.9 indicates that other densities may be	No	

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								acceptable, this does not tie in well with the policy wording. The above proposed modifications would more effectively enable discussion between the Council and applicants where schemes come forward with different densities.		
Richborough Estates	LPPS820	Policy 8A-Housing Density and Mix		Yes			The flexibility of policy 8A is welcomed. This will ensure that the plan is able to adapt to rapid change, as required by NPPF paragraph 11.		Yes	We would welcome the opportunity to attend the examination hearing sessions to discuss the issues we have identified which affect the soundness of the plan, and to meet with the Council to discuss the above evidence base when it is further evolved.
Taylor Wimpey West Midlands	LPPS1022	Policy 8A		No		Effective	Land at Rectory Lane Stourport The policy sets out a suggested dwelling size and market/ affordable mix using proportions. This is considered to be overly prescriptive given that in different locations there may be an excessive amount of a particular dwelling size and, therefore, any new proposal should not be constrained from delivering an appropriate mix to achieve a better balance overall. However, it is noted that the policy has been updated since the Preferred Option to recognise that Table 8.0.1 provides an 'indicative view' on likely overall dwelling size required and that the actual mix achieved will be influenced by the market. This is supported by Taylor Wimpey. In terms of the average density requirement, this is consistent with the requirements of the NPPF (an average of 35 dwellings per hectare), and it is noted that modifications to the policy have been provided since the Preferred Options document to provide an element of flexibility to allow for new development to reflect local character, which may be at a lower/ higher density depending on the location of the proposal. This is supported by Taylor Wimpey as 'sound.'		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Homes England	LPPS98	Policy 8B	Yes	Yes	Yes		This policy states that a minimum of 25% affordable housing should be provided on sites of 10 dwellings or more. The policy recognises that in some cases this level may not be achievable, and in such instances evidence is required by a financial		Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to

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							viability assessment. This policy is supported as it recognises that 25% may not be viable in all cases and identifies how this should be dealt with. Clarity on the application of vacant building credit is welcomed. With regard to the indicative tenure split of 65% rented and 35% intermediate, it is agreed that this split should be determined on a site by site basis based on housing need and viability as this could change over the plan period and is also subject to different intermediate products that may be available over the plan period. Homes England welcomes reference to entry level exception sites and build to rent schemes and the role that they play in the provision of affordable housing.			have the opportunity to participate at the examination in support of the allocation.
Campaign to Protect Rural England	LPPS344	Policy 8B	No	No	Yes	Effective	Both policies on Entry Level and Rural exception sites require there to be a local need, but no mechanism is defined for determining the level of local need, (net need). It is important that this should derive from a Housing Needs Survey conducted before an application is submitted, not merely the number of people on the Council housing list. The latter shows gross need not net need. Where there is one family needing a bigger house and another needing a smaller one , the gross need is two, but the net need may well be zero.	It would be better if these policies were split into several separate ones on the various different types of housing. The requirement for a housing needs survey should be specified. The failure to conduct such surveys in advance causes doing so while an application is pending to produce unsatisfactory (biased) conclusions.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Taylor Wimpey West Midlands	LPPS640	Policy 8B		No		Justified	Comberton Road Kidderminster Policy 8B requires sites of 10 or more dwellings to deliver a minimum affordable housing provision of 25%. This is supported by viability evidence set out in Viability Report dated October 2018 by HDH Consultants. It is noted that the Council has tested 25% affordable housing provision, however this has not been tested in combination with other policy requirements, including 1% Part M Category 3, self/custom build plots, electric vehicle charging points and 10% renewable/low carbon energy. Whilst Taylor Wimpey supports the 25% affordable housing requirement, further representations are submitted in respect of the additional onerous requirement of Policies 8D and 8E. In relation to tenure split, Policy 8B identifies an indicative tenure split of 65% rented (including social rent) and 35% intermediate tenure will be sought. This does not appear to be aligned to the Council's own evidence base contained within the Wyre Forest Housing Needs Study 2018. This document, at page 54, instead identifies data to support a 60% rented/ 40% intermediate tenure split. To ensure the Policy is consistent with the Council's own evidence base, the indicative tenure split should be amended to provide an indicative 60% rented (including social rent) and		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

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							40% intermediate (including sub-market private rent and shared ownership) tenure split. The reference to the tenure split being 'indicative' is supported. It is recognised that there are a number of different affordable housing models that are being brought to the market and accordingly the local planning authority should not be too prescriptive setting out targets. In addition, it is advised that this policy requirement remains flexible to allow for site specific circumstances, such as viability and/ or tenure profile of location, whereby it may be appropriate to offer a different proportional split. With regard to build to rent schemes, the policy requires security of tenure through tenancy agreements of 3 years or more. This may not be appropriate for all build to rent proposals and there should be some flexibility in the application of this requirement.			
West Midlands HARP Planning Consortium	LPPS772	Policy 8B		No		Effective Consistent with National Policy	**Vacant Building Credit** National policy and guidance indicates that local authorities should incentivise brownfield development, and so this policy is broadly supported. As drafted however, the draft policy is too onerous, with no justification for imposing additional criteria not already set out within national guidance. The Council has sought to impose the guidance which is used for deductions in CIL, and the marketing requirement typically only applied when considering the loss of buildings in economic use. **Tenure Split** We welcome the Council's commitment to negotiating the tenure mix of affordable housing on individual sites as this will enable it to respond flexibly to schemes that come forward to meet local needs and which do not comply with that indicative split. This ensures that deliverable development may still come forward to meet locally-specific needs. It is also important that to be consistent with national policy that at least 10% of major developments be delivered as an affordable home ownership tenure. This policy should reflect the requirement, and exemptions, set out in paragraph 64 of the NPPF to ensure sufficient affordable housing is delivered to meet the full range of local housing needs. **Affordable Housing-Led Schemes** This section of the policy as currently written is not consistent with national policy which only seeks to restrict 'enabling' development of open market units in relation to rural exception sites. The policy as drafted could instead apply to schemes delivered by Registered Providers as straightforward	As drafted this policy is not consistent with national policy and effective and should be amended as below to meet the tests of soundness: **Vacant Building Credit** Vacant Building Credit will apply to brownfield land where vacant buildings are being reused or redeveloped. Applications relating to the redevelopment of vacant buildings will need to meet all the following criteria: 1. The building is not in use at the time the application is submitted, ~~and has not been in continuous use for any six months during the last five years up to the date of the planning application is submitted~~. 2. The building is not covered by an extant permission for a materially similar development, or a permission for a materially similar development expired within the six months up to the date of the planning permission is submitted. 3. The building has not been made vacant for the sole purpose of redevelopment: ~~the applicant will be required to provide evidence that the site has been actively marketed for at least two of those three years at realistic~~	No	

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							policy-compliant applications but on which the intention is to deliver an above-policy level of affordable housing. For example, a proposal for a 50 dwelling scheme would normally have a requirement for 25% affordable housing, delivering 13 affordable units; should an RP wish to deliver 45% as affordable (23 units) with only 25% secured in a S106 Agreement the policy as worded would require additional scrutiny of viability and effectively refuse an application for delivering a greater level of open market units (27) than affordable, and a proportion greater than 20% for which we see no clear basis. This could have the effect of suppressing delivery of affordable housing-led schemes by Registered Providers and we recommend that this section of the policy should be removed wholesale. This will ensure such developments can continue to be effectively delivered without overly onerous policy requirements and also ensure the wider policy is consistent with the Framework. **Entry Level Exception Sites** The introduction of this element of the policy is supported as it is consistent with the new Framework which supports the delivery of affordable housing adjacent to rural and urban settlements to meet local needs	~~prices, and that no financially viable interest has been expressed~~. **Tenure Split** The wording should be amended as below to better reflect the definition of affordable housing as set out in the NPPF 2018, without tying the Council to strict tenure splits. This will ensure the Plan is consistent with national policy and effective in enabling affordable housing that meets local needs to be delivered: An indicative tenure split of 65% rented (including social rent) and 35% ~~intermediate~~ affordable housing for sale tenure(s) (including ~~sub-market private rent and~~ shared ownership) will be sought for affordable housing provision on new sites. The exact split will be determined on a site by site basis based on housing need and viability (if relevant). **Entry-level exception sites** Inserting reference to early engagement with Registered Providers, as below, would be helpful in facilitating early understanding of need, the practical requirements of delivering affordable housing for local people and enabling earlier delivery of affordable housing where RPs may already have an active interest. The District Council will work with the Town and Parish Councils, Community Led Housing Groups, Registered Providers and Neighbourhood Planning Forums to identify appropriate sites for entry-level exception sites. Paragraph 71 of the new Framework sets out the criteria for entry-level exception sites – and unlike for rural exception sites there is no requirement for affordable housing delivered on such sites to be secured *in perpetuity* or for any subsidy to be recycled, except in relation to the provisions set out in Annex 2 on individual tenures. This section of the policy is inconsistent with national policy and should be		

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								removed. i. The site provides entry-level homes suitable for first time buyers (~~or equivalent, for~~ those looking to rent). ~~The scheme should include provisions to maintain houses at an affordable price or rent for future eligible households. Where legislation prevents this from happening then agreement must be reached with the Registered Provider to find a replacement unit if the original property is sold at market price~~. We have previously provided specific feedback to the Council on the need to abstain from seeking to secure all affordable housing in perpetuity, highlighting the impact of this on funding development not only on individual schemes but more widely. This restriction limits lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions. When used in a rigid fashion this also prevents tenants from being able to staircase to full home ownership. Receipts from the sales of affordable housing are not undertaken lightly by our members, all of which funnel receipts into the delivery of more affordable housing. It is more appropriate for the Council to consider the best use of conditions and legal obligations to maintain a supply of affordable housing, looking to other mechanisms to allow the recycling of any public subsidy in new stock. With regards to criterion (ii), the NPPF does not require entry-level exception sites to be accessible to local services and facilities; while this is clearly desirable the delivery of such developments not only enables more people to access affordable housing, but this improves the vitality and viability of those settlements, improving the ability to deliver local services and facilities. ii. The site is adjacent to the existing settlement, ~~and should be accessible to local~~		

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								~~services and facilities.~~ The wording of the fourth part of the policy is not consistent with the NPPF, nor reasonable in its expectations. Decision makers could not apply it consistently or with confidence as any development will change the character of the settlement and landscape; it is the effect of that change on protected areas or assets which is important. As the NPPF requires Local Plans to distinguish between the hierarchy of internationally, nationally and locally designated sites and protected and enhanced valued landscapes, this should be properly reflected. iv. The scale of the scheme should be <u>proportionate</u> appropriate to the size and character of the settlement and must not <u>significantly</u> damage the character of the settlement or <u>any</u> the surrounding <u>valued</u> landscape.		
Land Research & Planning Associates Ltd	LPPS833	Policy 8B	Yes	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	The Local Plan is unsound because it acknowledges an annual deficiency of 158 Affordable Homes (nearly 3000 over the plan period) and has not allocated land to accommodate this; and the percentage of 25% on larger sites is well below the average in adjoining LPAs. This is in addition to the annual requirement of 276 houses.	Allow land to be allocated such as has been promoted; but rejected by the LPA [Ref.: BR/RO/14 at Pound Bank] where landowners have offered 50% to be Affordable Homes in the Call for Sites/Preferred Sites Consultation in which we responded in August 2017. At paragraph 36.2 in the Local Plan Pre-consultation Responses [Oct 2018], the LPA has indicated in conjunction with other sites in Far Forest that it is a green field site [accepted] but is constrained by Ecological matters. The latter is absolutely refuted by our clients and no evidence has been shown by the LPA to substantiate this statement. Nevertheless the Reasoned Justification importantly confirms that: “Far Forest has a thriving Primary School – a Public House – a Shop and Churches” yet the Officer’s comment upon our representation in 2017 that it is not located in a suitable position. It is close to main A456 and just 5 minutes to Bewdley. The Highway Report attached confirms that there are not any safety or access issues in accessing this land for	Yes	In order to be able to have constructive dialogue with the Local Plan Inspector about the misconception that this Site is unsuitable and the NPPF requirements referred to above.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								Housing up to a sustainable figure. In addition the Local Plan does not accord with the advice set out in the NPPF 2018 and so this has not been met at paragraphs: 8b - 09 – 11a & 11b – 20a & 20b - 59 – 68 – 77 – 78 – 110a making the Plan unsound. Paragraphs 78/9 of the NPPF seek to assist the Rural Areas. The choice by WFDC in regard the west of Bewdley of some Sites is inconsistent with the reasons for rejecting our clients' Sites. These chosen Sites [Refs WF/UA/ 1, 4 and 6] which are more isolated than the land at Pound Bank are located much further away from other development suggesting that if these are regarded as Sustainable Locations - then our clients' land at Pound Bank surely must be too. In any event the Allocation in the Rural Areas is only 69 in total which is unacceptable in area not designated as Green Belt. This is not compliant with 78/79 of the NPPF. Paragraph 69 seeks that 10% of the Local Plan requirement should provide areas of 1 hectare or less to allow smaller developments. Upon examination of the Local Plan it is difficult to see where [if at all] that advice has been followed. The Plan does not provide for all the Social needs of the Community as there is a District Wide deficiency of land for Affordable Homes and so is not compliant with the NPPF and is therefore NOT Sound. There is a serious need to significantly modify Policies 8B and 8C which we shall draft for the Inquiry plus modification of other relevant Policies to address this shortfall.		
Home Builders Federation (HBF)	LPPS906	Policy 8B		No	No	Positively Prepared Justified Effective Consistent with National	The Council should have set out different policy requirements for the provision of affordable housing by site typology and market value area rather than the proposed District wide approach. Furthermore the Council's evidence does not support the "minimum" prefix to the 25% requirement for affordable housing provision.	It is recommended that the council reconsiders this policy.	Yes	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Policy				
Taylor Wimpey West Midlands	LPPS1023	Policy 8B		No		Justified	Land at Rectory Lane Stourport Policy 8B requires sites of 10 or more dwellings to deliver a minimum affordable housing provision of 25%. This is supported by viability evidence set out in Viability Report dated October 2018 by HDH Consultants. It is noted that the Council has tested 25% affordable housing provision, however this has not been tested in combination with other policy requirements, including 1% Part M Category 3, self/custom build plots, electric vehicle charging points and 10% renewable/low carbon energy. Whilst Taylor Wimpey supports the 25% affordable housing requirement, further representations are submitted in respect of the additional onerous requirement of Policies 8D and 8E. In relation to tenure split, Policy 8B identifies an indicative tenure split of 65% rented (including social rent) and 35% intermediate tenure will be sought. This does not appear to be aligned to the Council's own evidence base contained within the Wyre Forest Housing Needs Study 2018. This document, at page 54, instead identifies data to support a 60% rented/ 40% intermediate tenure split. To ensure the Policy is consistent with the Council's own evidence base, the indicative tenure split should be amended to provide an indicative 60% rented (including social rent) and 40% intermediate (including sub-market private rent and shared ownership) tenure split. The reference to the tenure split being 'indicative' is supported. It is recognised that there are a number of different affordable housing models that are being brought to the market and accordingly the local planning authority should not be too prescriptive setting out targets. In addition, it is advised that this policy requirement remains flexible to allow for site specific circumstances, such as viability and/ or tenure profile of location, whereby it may be appropriate to offer a different proportional split. With regard to build to rent schemes, the policy requires security of tenure through tenancy agreements of 3 years or more. This may not be appropriate for all build to rent proposals and there should be some flexibility in the application of this requirement.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Udall Diana	LPPS93	8B		No			I consider that the local plan is unsound as there is no mention of land designated for social housing. All the areas designated for housing are either solely for sale at the market rate or as part of the 25% at the so called		No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							"affordable" rate with some being for part rent-part buy. Wyre Forest is a low wage area, with families on either the minimum wage or just above - so such housing will be of no benefit to a significant proportion of Wyre Forest residents and those on the waiting list for Social Housing – as they will not be affordable. Wyre Forest needs considerably more Social Housing for rent – land for this should be designated in the plan otherwise such housing will not be built. When visiting the drop-in session at Kidderminster Town Hall I raised this issue with the staff at the event – their initial response was that there would be 25% affordable housing – I then explained to them that affordable was not social housing – the rent for social housing is less than "affordable" rent, making it really affordable for residents of Wyre Forest. WFDC staff should know the difference!!			
Hagley Parish Council	LPPS230	8B	Yes	No	Yes	Justified Effective	The policy on affordable housing will not be effective to deliver 25% affordable, because small sites (10 or under) deliver zero. This must mean that the average is likely to be less than 25%. WFCS provided for 60 affordable houses out of 175 per year, which is marginally under 35%. Actual delivery 2007-16 was 31% (Annual monitoring report 2016). For comparison, Bromsgrove with a target of up to 40% (but negotiable for viability) delivered only 28%.	The affordable housing target should be 33% or 35%.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Campaign to Protect Rural England	LPPS346	Policy 8B	Yes	No	Yes	Justified Effective	The adoption of a threshold of 10 dwellings (though in accordance with NPPF) leads to distortions in the market and particularly to very low provision in rural areas, where houses are often least affordable. 25% provision is actually low, when Bromsgrove and Birmingham are prescribing 40% (of which part are of intermediate tenures). In Bromsgrove recent delivery has been 28% affordable. A threshold of 10 encourages creates a cliff edge where developers will prefer to bring forward schemes for 9 swellings where there would be room for 10, because a scheme for 10 houses would require 2-3 affordable, whereas a scheme for 9 would have none affordable. If the target is to be 25%, the threshold should be 4 (4 x 25% = 1). If it were 35% the threshold should be 3 (also producing one affordable). Better still, WFDC should establish a scheme whereby builders paid or were paid for fractions of houses that	Threshold should be 3 and the target 40%.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.

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							they should have provided under the formula. The effect of the threshold is particularly severe in rural areas, where schemes tend to be smaller and may not reach the threshold at all. See https://www.cpre.org.uk/resources/housing-and-planning/item/4781-viable-villages-closing-the-planning-loophole-that-undercuts-affordable-housing-in-the-countryside and links therein			
	LPPS669	Policy 8b	No	No	No	Justified Effective	Policy 8b- Insufficient affordable homes being built. therefore affluent people from outside the area will be attracted and the current housing need for 2 bedroom homes will not be met. Should be 25% as per national guidelines.		No	
Euro Property Investments Ltd.	LPPS783	8B	Yes	Yes	Yes		We have no objection in principle to the provision of affordable housing being required as part of new residential developments. Furthermore, we have no objection to the suggested tenure split between social rented and intermediate tenures of 65%/35% respectively.		Yes	We are promoting one of the four draft residential allocations in Bewdley and therefore key to the delivery of new housing in the settlement
Gladman Developments Ltd	LPPS866	Policy 8B	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The above policy seeks to deliver a minimum annual average target of 90 affordable dwellings to be delivered during the plan period to 2036. This requires all sites of 10 homes or more to deliver a minimum of 25% affordable housing. Gladman raise concerns with the above policy and its approach to securing affordable housing as it would result in less affordable dwellings being delivered than that identified by the current housing needs evidence. Given that the Council's viability evidence identifies that Wyre Forest is not a particularly high value area, the policies in the Plan should be as flexible as possible. This is important as the policies of the Plan when taken as a whole, such as the optional building regulations and public open space contributions, which have not been cumulatively assessed in the Council's viability evidence, may result in even less affordable housing being delivered. This reinforces the need for additional housing land to be identified in the Plan to ensure the delivery of affordable housing through a mixed market led approach.		Yes	To discuss the issues raised in our written submissions.
Barberry Hurcott Limited	LPPS927	Affordable Housing Provision	No	No	No	Positively Prepared Justified Effective	Wyre Forest is a District with an acute affordable housing need. The Borough has historically set its affordable housing targets too low in order to give the impression that they have been achieving their targets. However, the reality is that the Council		Yes	Due to the complexities of the issues of concern to the promoter, and the nature and the extent of

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Consistent with National Policy	has been ignoring their affordable housing needs causing the situation to exacerbate further. The high levels of homelessness and households on the housing register are key indicators that the housing market is dysfunctional, especially when compared to neighbouring authorities. Critically the Council is ignoring its evidence base that recommends 158 affordable housing completion per annum. This policy approach is contrary to NPPF as the plan is not positively prepared or effective and therefore fails the tests of soundness.			public involvement in this site, it is considered that further verbal clarification and discussion at the EiP Hearings will be essential, and will further assist the inspector.
Taylor Wimpey West Midlands	LPPS1039	Policy 8B		No		Justified	Land at Bewdley Road North Stourport Policy 8B requires sites of 10 or more dwellings to deliver a minimum affordable housing provision of 25%. This is supported by viability evidence set out in Viability Report dated October 2018 by HDH Consultants. It is noted that the Council has tested 25% affordable housing provision, however this has not been tested in combination with other policy requirements, including 1% Part M Category 3, self/custom build plots, electric vehicle charging points and 10% renewable/low carbon energy. Whilst Taylor Wimpey supports the 25% affordable housing requirement, further representations are submitted in respect of the additional onerous requirement of Policies 8D and 8E. In relation to tenure split, Policy 8B identifies an indicative tenure split of 65% rented (including social rent) and 35% intermediate tenure will be sought. This does not appear to be aligned to the Council's own evidence base contained within the Wyre Forest Housing Needs Study 2018. This document, at page 54, instead identifies data to support a 60% rented/ 40% intermediate tenure split. To ensure the Policy is consistent with the Council's own evidence base, the indicative tenure split should be amended to provide an indicative 60% rented (including social rent) and 40% intermediate (including sub-market private rent and shared ownership) tenure split. The reference to the tenure split being 'indicative' is supported. It is recognised that there are a number of different affordable housing models that are being brought to the market and accordingly the local planning authority should not be too prescriptive setting out targets. In addition, it is advised that this policy requirement remains flexible to allow for site specific circumstances, such as viability and/ or tenure profile of location, whereby it may be appropriate to offer a different		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							proportional split. With regard to build to rent schemes, the policy requires security of tenure through tenancy agreements of 3 years or more. This may not be appropriate for all build to rent proposals and there should be some flexibility in the application of this requirement.			
Campaign to Protect Rural England	LPPS345	Policy 8C	No	No	Yes	Effective	Both policies on Entry Level and Rural exception sites require there to be a local need, but no mechanism is defined for determining the level of local need,(net need). It is important that this should derive from a Housing Needs Survey conducted before an application is submitted, not merely the number of people on the Council housing list. The latter shows gross need not net need. Where there is one family needing a bigger house and another needing a smaller one , the gross need is two, but the net need may well be zero	It would be better if these policies were split into several separate ones on the various different types of housing. The requirement for a housing needs survey should be specified. The failure to conduct such surveys in advance causes doing so while an application is pending to produce unsatisfactory (biased) conclusions.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Land Research & Planning Associates Ltd	LPPS835	Policy 8C	Yes	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	No consideration has been given to PPG001 and the need to support Rural Areas by allowing a greater amount of Housing Development to support these. This matter is supported by the Braintree Cases 2017 and 2018. Many of the settlements to the west of Bewdley could easily be supported by the facilities in Bewdley and Callow Hill as the distance is minimal and only perhaps five to six minutes drive by car or a few minutes more by bicycle. Policy Text 13.36 supports the need for people to walk/cycle.	Allow land to be allocated such as has been promoted; but rejected by the LPA [Ref.: BR/RO/14 at Pound Bank] where landowners have offered 50% to be Affordable Homes in the Call for Sites/Preferred Sites Consultation in which we responded in August 2017. At paragraph 36.2 in the Local Plan Pre-consultation Responses [Oct 2018], the LPA has indicated in conjunction with other sites in Far Forest that it is a green field site [accepted] but is constrained by Ecological matters. The latter is absolutely refuted by our clients and no evidence has been shown by the LPA to substantiate this statement. Nevertheless the Reasoned Justification importantly confirms that: “Far Forest has a thriving Primary School – a Public House – a Shop and Churches” yet the Officer’s comment upon our representation in 2017 that it is not located in a suitable position. It is close to main A456 and just 5 minutes to Bewdley. The Highway Report attached confirms that there are not any safety or access issues in accessing this land for Housing up to a sustainable figure. In addition the Local Plan does not accord with the advice set out in the NPPF 2018 and so this has not been met at paragraphs: 8b - 09 – 11a & 11b – 20a & 20b - 59 – 68 – 77 – 78 – 110a making the Plan unsound. Paragraphs 78/9 of the NPPF seek to assist the	Yes	In order to be able to have constructive dialogue with the Local Plan Inspector about the misconception that this Site is unsuitable and the NPPF requirements referred to above.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								Rural Areas. The choice by WFDC in regard the west of Bewdley of some Sites is inconsistent with the reasons for rejecting our clients' Sites. These chosen Sites [Refs WF/UA/ 1, 4 and 6] which are more isolated than the land at Pound Bank are located much further away from other development suggesting that if these are regarded as Sustainable Locations - then our clients' land at Pound Bank surely must be too. In any event the Allocation in the Rural Areas is only 69 in total which is unacceptable in area not designated as Green Belt. This is not compliant with 78/79 of the NPPF. Paragraph 69 seeks that 10% of the Local Plan requirement should provide areas of 1 hectare or less to allow smaller developments. Upon examination of the Local Plan it is difficult to see where [if at all] that advice has been followed. The Plan does not provide for all the Social needs of the Community as there is a District Wide deficiency of land for Affordable Homes and so is not compliant with the NPPF and is therefore NOT Sound. There is a serious need to significantly modify Policies 8B and 8C which we shall draft for the Inquiry plus modification of other relevant Policies to address this shortfall.		
West Midlands HARP Planning Consortium	LPPS985	Policy 8C		No		Effective Consistent with National Policy	This policy is supported as it encourages delivery of affordable housing in the district's rural areas, subject amended policy wording.	To make the policy sound we recommend the following minor changes to ensure effectiveness, and consistency with national policy: **iii.** The scale of the scheme should be appropriate to the size and character of the settlement and must not significantly damage the character of the settlement or any ~~the~~ surrounding valued landscape. The requirement for developers of major development to demonstrate how the needs of self- builders have been taken into account is overly onerous when considering the delivery of schemes of around 10 to 50 dwellings. It would be more appropriate for this policy to consider the viability of delivering self-build	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								plots on different scheme sizes and for this to be linked to known areas of interest across the District as at present this policy would apply to all major residential developments – including affordable housing-led schemes. With such a small register of household demand for self- and custom-build plots this policy does not appear reasonable, necessary or justified and is considered unsound. The Council should set a more appropriate threshold for delivering self-build plots such that it does not squeeze the delivery of affordable housing for people in greater need.		
Campaign to Protect Rural England	LPPS349	Policy 8C	Yes	No	Yes	Effective	We have seen a couple of cases in Bromsgrove District where housing has been sought in rural areas in support of commercial fisheries, but these are not "agriculture or forestry". However the need is similar. It is alleged that a person is needed on site to turn on oxygenation equipment if ponds suddenly become too warm (and lose oxygen) in summer.	Extend the wording to cover employment in commercial fisheries	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Gladman Developments Ltd	LPPS872	Policy 8C	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Whilst Gladman support the principle of directing future growth to the main town and market towns to meet development needs within the district, this should not be at the expense of ensuring that the housing and employment needs of other settlements lower down in the settlement hierarchy can come forward. Whilst it is recognised that some of these villages are small in scale and consideration of the setting and character of a settlement is important, these issues must be balanced against the needs of the local community for new housing, including affordable housing and the need to ensure the long term viability of services and facilities within the village. The Local Plan must avoid the creation of a sustainability trap whereby settlements are unable to improve the range of services and facilities available to residents that would allow it to escalate up the sustainability ladder. In this regard, Policy 8C provides a limited ability for settlements to thrive and grow to meet future generations needs and should be reconsidered.		Yes	To discuss the issues raised in our written submissions.
Gladman Developments Ltd	LPPS873	Policy 8D	No	No	No	Positively Prepared Justified Effective Consistent with National	In principle, Gladman welcome the addition of a policy in relation to self-build housing within the Local Plan. This would be in line with current government thinking and objectives by allowing those who are interested the opportunity to develop their own custom homes. It is key that the development industry is able to understand the implication of any such policy requirement, to assist with the design of schemes and		Yes	To discuss the issues raised in our written submissions.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Policy	the consideration of financial viability. It is supported that some flexibility is built within the policy which allows selfbuild plots to revert back to market housing to be provided as part of a wider scheme after a period of 12 months. However, the policy requires all developments above 50 dwellings to provide an element of self-build plots. This is not considered appropriate as it is clear from the evidence taken from the Council's Self/Custom Build Register that as of March 2018 only 60 people have registered interest in this form of development. It is therefore not the appropriate for a developer to provide such plots on site when there is no evidence to demonstrate a demand for such form of housing at the scale proposed. As such, the policy as currently worded is likely to have an adverse knock-on effect on people securing market housing.			
Taylor Wimpey West Midlands	LPPS1024	Policy 8D		No		Justified Effective	Land at Rectory Lane Stourport In terms of the requirement for all major housing development proposals to provide evidence that they have fully considered the provision of self/ custom build within the overall housing mix on site, from an urban design/masterplanning perspective, the integration of a number of self builds into a scheme being delivered by a volume housebuilder (that often work on standard house types) would possibly be difficult to achieve in respect of both making an efficient use of land; and to achieve design consistency. Further, sites currently being put forward by developers have been negotiated on the basis of existing planning policies and values and such an addition could impact on viability. It is recommended that further work be commissioned in order to find out where households would like to have the opportunity to undertake a self build, so that the planning policies can better provide for the need rather than simply asking developers of all large sites to offer land. In addition, the Council's own evidence base does not appear to fully justify a need for self/custom build properties to be considered on all sites over 10 dwellings. In March 2018 only 60 people had registered indicating preferences for plots in rural locations and larger dwellings with 3 or more bedrooms. This evidence does not support the Council's proposed requirements under this policy.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Barratt Homes West Midlands	LPPS759	Policy 8D-Self build and custom housing	Yes	No	Yes	Justified Effective	Policy to be reworded to the council will require provision of self build in locations where there is a recognised need, as identified by the self-build register. The 12 month marketing period should be reduced to 6 months.	Policy 8D should be amended to advise that self-build plots will only be sought where the Self- Build Register has identified a need for the plot. In addition, the market period should be	Yes	The delivery of self-build accommodation is a key issue. It affects scheme viability and delivery. The worded policy will not

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								shortened for reasons referred to in the attached response.		deliver self-build accommodation where it is required. It is necessary to attend the examination in order to explain the difficulties that will arise as a consequence of this policy.
Homes England	LPPS99	Policy 8D	Yes	Yes	Yes		The Council is seeking to support prospective self builders on sites of 10 or more dwellings or on sites with an area of 0.5 hectares of more by requiring developers to demonstrate how they have taken this need into account through agreement with the Council and consideration of demand on the Self Build Register. Homes England is supportive of the requirement for an agreed design code for such dwellings, but it is important to ensure that agreeing a design code does not delay the delivery of such dwellings unduly. The reference to custom build plots being built out by the developer if they have not sold after 12 months of marketing is helpful as this will avoid plots remaining vacant for too long.		Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Taylor Wimpey West Midlands	LPPS1040	Policy 8D		No		Justified Effective	Land at Bewdley Road North Stourport In terms of the requirement for all major housing development proposals to provide evidence that they have fully considered the provision of self/ custom build within the overall housing mix on site, from an urban design/masterplanning perspective, the integration of a number of self builds into a scheme being delivered by a volume housebuilder (that often work on standard house types) would possibly be difficult to achieve in respect of both making an efficient use of land; and to achieve design consistency. Further, sites currently being put forward by developers have been negotiated on the basis of existing planning policies and values and such an addition could impact on viability. It is recommended that further work be commissioned in order to find out where households would like to have the opportunity to undertake a self build, so that the planning policies can better provide for the need rather than simply asking developers of all large sites to offer land. In addition, the Council's own evidence base does not appear to fully justify a need for self/custom build properties to be considered on all sites over 10 dwellings. In March 2018 only 60 people had registered indicating preferences for plots in rural locations and larger dwellings with 3 or more bedrooms. This evidence does not support the Council's proposed requirements under this policy.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 8: A DESIRABLE PLACE TO LIVE

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Home Builders Federation (HBF)	LPPS908	Policy 8D		No	No	Positively Prepared Justified Effective Consistent with National Policy	Policy 8D is not clear, robust or effective for development management purposes especially for sites of 10 – 50 dwellings. Any policy requirement for self / custom build serviced plots on housing sites of more than 50 dwellings should be fully justified and supported by evidence of need. The Council should assess such housing needs as set out in the NPPG (ID 2a-021). With only 60 on the self-builders list the evidence does not support the proposed requirements in this policy. The proposed 12 month offered for sale period is too long.	It is recommended that the council reconsiders this policy.	Yes	
Persimmon Homes Limited	LPPS808	Policy 8D	Yes	No	Yes	Justified Effective	Policy 8D requires developers of sites of 10 or more dwellings to demonstrate how they have considered the needs of self builders and goes on to state that sites of more than 50 dwellings will be considered as most suitable for self-build dwellings. The Council's website states that in terms of locational preference most individuals on the Council's self and custom build register would prefer a rural or village location. Whilst the register states that most individuals on the register would consider a plot that was part of a new build housing development it is unlikely that there would be many developments of 50 dwellings or more approved within the rural area or within villages, which is where the demand for plots is. It is not clear at this stage whether the evidence produced in support of the plan justifies the proposed policy approach. The Council should also consider the practicalities self and custom builders developing individual plots as part of a wider development in relation to health & safety, working hours and the length of build programme. The Council should seek to allocate specific sites for self and custom build housing and they should consider incorporating this into a rural exceptions policy. The second paragraph of the policy is superfluous. If an application is in keeping with the policies in the Plan then it should automatically be approved without delay (in accordance with Paragraph 11.C of the NPPF.	The requirement for developments of 10 or more dwellings and more than 50 dwellings to incorporate self and custom-build should be deleted from the policy. The third paragraph should also be deleted.	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination.
Taylor Wimpey West Midlands	LPPS635	Policy 8D		No		Justified Effective	Comberton Road Kidderminster In terms of the requirement for all major housing development proposals to provide evidence that they have fully considered the provision of self/ custom build within the overall housing mix on site, from an urban design/masterplanning perspective, the integration of a number of self builds into a scheme being delivered by a volume housebuilder (that often work on standard house types) would possibly be difficult to achieve in respect of both making an efficient use of land; and to achieve		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							design consistency. Further, sites currently being put forward by developers have been negotiated on the basis of existing planning policies and values and such an addition could impact on viability. It is recommended that further work be commissioned in order to find out where households would like to have the opportunity to undertake a self build, so that the planning policies can better provide for the need rather than simply asking developers of all large sites to offer land. In addition, the Council's own evidence base does not appear to fully justify a need for self/custom build properties to be considered on all sites over 10 dwellings. In March 2018 only 60 people had registered indicating preferences for plots in rural locations and larger dwellings with 3 or more bedrooms. This evidence does not support the Council's proposed requirements under this policy.			participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
National Federation of Gypsy Liaison Groups	LPPS210	8F	Yes	No	No	Positively Prepared Justified Effective Consistent with National Policy	This policy does not comply with National policy as it fails to address the requirement to allocate sufficient land to meet the need for Traveller sites for at least a five year period. Furthermore, this policy is too restrictive. As and when applications for Traveller pitches are received, they should be dealt with in accordance with a realistic policy. Restricting sites to those which are "on previously developed land or in areas allocated primarily for residential development subject to all relevant policies" will effectively prevent any sites being acceptable since sites which comply with this restrictive policy will be equally acceptable for mainstream housing and will thus inevitable be beyond the reach of Travellers. Given the shortfall in allocated sites it is essential that the policy is sufficiently flexible to ensure that "windfall" sites come forward and are approved. That will not happen on the basis of this policy	Modify the criteria for acceptable Traveller sites, removing the restriction to previously developed land and areas allocated for residential development.	Yes	To ensure the views of Gypsies and Travellers are adequately represented.
Campaign to Protect Rural England	LPPS353	Policy 8G	No	No	Yes	Justified Effective Consistent with National Policy	The provision of one site for travelling showmen fails to deal with the possibility that another family of them may need accommodation within the Plan Period. Certain aspects of the present policy would be better included in the site-specific policy 30.29 on Zortec Avenue, or perhaps the whole of this one should be moved here and a separate policy to deal with the situation of a further site being needed.	Add paragraph to effect that if further sites are required they will be allocated [using the same criteria as for Gypsies and other Travellers] [or] [from land allocated for housing] - we are open to either alternative.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Worcestershire Wildlife Trust	LPPS329	8G	Yes	Yes	Yes		The WWT support the removal of the previously proposed site at Heath Lane, Stone from this policy.		No	
Campaign to	LPPS380	Policy 8G	No	No		Justified	This is essentially a drafting point: some of the conditions for	Policy 8G should merely allocate the site for	No	This is a minor drafting

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Protect Rural England						Effective	this development appear in Policy 30.22 and others in Policy 8G. It would be better for all the conditions to be in one place, probably 30.22	one Travelling Showmen family. The rest of the content of that policy should be moved to Policy 30.22.		issue, which we would hope the Council will accept without debate
Taylor Wimpey West Midlands	LPPS1041	Policy 8E		No		Justified Effective	Land at Bewdley Road North Stourport With regard to providing evidence to demonstrate that major housing development proposals have fully considered the provisions of certain tenures and types and for the need for 487 residential units to be met on sites allocated for housing, it must be recognised that the care accommodation industry is very different to the house building industry. Whilst on the larger schemes care homes can be provided for, on smaller schemes it is far more difficult to make a viable and meaningful contribution. The Council's policy should remain flexible in requiring such specialist development given the complexities. Further, it is likely that opportunity sites will exclusively come forward for homes for older people and/ or specialist housing, which may meet the needs identified. Under Policy 8E on sites of 10 or more dwellings 20% of dwellings must meet higher optional Building Regulation of Part M Category 2 accessible and adaptable homes and 1% Part M Category 3 wheelchair user homes. If the Council wishes to adopt the higher optional standards for Part M Category 2 and 3 then this should only be done in accordance with the 2018 NPPF (para 127f & Footnote 42). The Written Ministerial Statement (WMS) dated 25th March 2015 stated that "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG." Taylor Wimpey considers that this policy requirement has not been justified by the evidence base available and the higher optional standards should be removed.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Gladman Developments Ltd	LPPS875	Policy 8E	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	In principle, Gladman recognise the importance of delivering housing to assist in meeting the needs for older people. However, the policy as currently worded requires all major housing developments to contribute towards providing 20% of the total housing requirement to meet the higher access standards set out in M4(2) requirements and a further 1% of the overall number of housing units to meet M4(3) requirements for wheelchair user dwelling standards. In this regard, Gladman refer to the PPG which provides additional guidance on the use of these optional standards. The Council need to ensure that this policy is in line with the		Yes	To discuss the issues raised in our written submissions.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							guidance and that the justification and specific detail of the policy take account of the various factors which the PPG refers to: "Based on their housing needs assessment and other available datasets it will be for the local planning authorities to set out how they intend to approach the need for Requirement M4(2) (accessible and adaptable dwellings), and / or M4(3) (wheelchair user dwellings), of the Building Regulations. There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including: • The likely future need for older and disabled people (including wheelchair user dwellings) • Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes, or care homes). • The accessibility and adaptability of existing stock. • How needs vary across different tenures. • The overall impact of viability." PPG ID: 56-007-20150327 Gladman note that these technical standards have deliberately been set as optional standards which, if to be included as a policy in the Local Plan, would need to be justified by robust evidence. Gladman do not consider sufficient evidence has been made available to support the requirements on the policy. When considering this policy, the Council need to be aware of the impact that these requirements can have on scheme viability and the knock-on effects that this could have on the delivery of much needed housing. Gladman further remind the Council that the requirement for M4(3) homes should only be required for dwellings over which the Council is responsible for as required by the PPG. In order to be able to include such requirements in the Local Plan, the Council will need to be able to robustly justify the inclusion and demonstrate that consideration has been given to this requirement within the viability study. Gladman reserve the right to make further comments on this policy should additional evidence be provided by the Council.			
West Midlands HARP Planning	LPPS987	Policy 8E		No		Effective Consistent	As with our comments above in relation to requiring applicants to consider the need for and viability of delivering self-build		No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Consortium						with National Policy	plots on all major developments (i.e. schemes of 10 or more dwellings), the requirement to demonstrate such consideration for the range of specialist older persons' accommodation is overly onerous and will have the effect of dampening delivery. As sheltered and extra care housing schemes typically require communal (unsalable) living space and some element of care to be provided, and most providers of such accommodation have minimum levels of at least 40 units to deliver a viable scheme, it is entirely unreasonable to expect a major development of 10 units to consider whether delivery of such options is appropriate or deliverable. It is also important to consider that the delivery of bungalows immediately reduces the overall development densities that may be achieved due to the footprint of such buildings; this must be considered together with the minimum density requirement and the Council ensure that the two policies do not conflict in bringing forward viable, deliverable development with appropriate and sufficient levels of affordable housing to meet local needs. Expecting developers to deliver 10% affordable home ownership, a number of self- or custom- build plots, and specialist accommodation would cumulatively render most developments across the district unviable and undeliverable. Furthermore, expecting Registered Providers to deliver and manage such developments would produce illogical management arrangements and challenges. We ask that the Council reconsider this requirement in light of clear viability evidence and together with the other policy requirements set out in the Plan. As specialist accommodation often has distinct requirements it is also important that the Council reconsider its requirement for mixed tenure schemes in relation to management issues and financing including service charges. The requirement to deliver specialist accommodation for sale and rent, and including intermediate forms of provision (a turn of phrase no longer in use within the Framework and which should be reworded) delivers no clarity for applicants and should be properly considered in relation to the above points, the level of need for such accommodation and the viability of delivering this policy requirement.			
Homes England	LPPS100	Policy 8E	Yes	Yes	Yes		Homes England recognises that this policy is seeking to address National Planning Guidance that specifies that Local Plans should consider the needs of older people and other with particular housing needs. The policy requires developers to		Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							provide evidence that they have fully considered the provision of particular tenures and types. The policy would benefit from clarity as to what the Council expects from developers in this regard otherwise it could be open to interpretation.			have the opportunity to participate at the examination in support of the allocation.
Euro Property Investments Ltd.	LPPS784	8E	Yes	Yes	Yes		We have no objection in principle to widening choice of housing to older people and others with special housing requirements. The suggestion of requiring 20% of dwellings in major housing developments to meet higher access standards as set out in Part M of the Building Regulations is a more sensible approach than requiring all new dwellings to meet these standards.		Yes	We are promoting one of the four draft residential allocations in Bewdley and therefore key to the delivery of new housing in the settlement
Campaign to Protect Rural England	LPPS351	Policy 8E	No	No	Yes	Positively Prepared Justified Effective	1. Extra Care is an obscure term, which is not defined in the glossary. The market knows of sheltered housing (e.g. McCarthy & Stone schemes) and Care Homes, of which the latter are best classified as C2 institutions. Nursing Homes differ from other Care Homes only by having a registered nurse on duty at all times. 2. The policy combines several unrelated topics: these should be split or at least numbered separately, for ease of future reference in dealing with planning applications 3. Families with children is not a special category that needs to be mentioned in this policy at all. The text here adds nothing to the policy 8A, as to the number of bedrooms per house.	• Define (or delete) extra care. • Split the paragraphs as separate policies, which will be easy to reference. • Delete section on families with children	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Taylor Wimpey West Midlands	LPPS636	Policy 8E		No		Justified Effective	Comberton Road Kidderminster With regard to providing evidence to demonstrate that major housing development proposals have fully considered the provisions of certain tenures and types and for the need for 487 residential units to be met on sites allocated for housing, it must be recognised that the care accommodation industry is very different to the house building industry. Whilst on the larger schemes care homes can be provided for, on smaller schemes it is far more difficult to make a viable and meaningful contribution. The Council's policy should remain flexible in requiring such specialist development given the complexities. Further, it is likely that opportunity sites will exclusively come forward for homes for older people and/ or specialist housing, which may meet the needs identified. Under Policy 8E on sites of 10 or more dwellings 20% of dwellings must meet higher optional Building Regulation of Part M Category 2 accessible and adaptable homes and 1% Part M Category 3 wheelchair user homes.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							If the Council wishes to adopt the higher optional standards for Part M Category 2 and 3 then this should only be done in accordance with the 2018 NPPF (para 127f & Footnote 42). The Written Ministerial Statement (WMS) dated 25th March 2015 stated that "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG." Taylor Wimpey considers that this policy requirement has not been justified by the evidence base available and the higher optional standards should be removed.			
Persimmon Homes Limited	LPPS807	Policy 8E	Yes	No	Yes	Justified Effective	Policy 8E states that developers of all major housing development proposals will be required to provide evidence that they have fully considered the provision of the following tenure and type within the overall housing mix on site (and that they should include housing for sale and rent): · Bungalows · Sheltered Housing · Extra Care Units · Other types of supported housing This requirement is overly prescriptive and potentially places unnecessary requirements on developments that do not appear to have been properly evidenced. The proposed wording is also imprecise, in that no further guidance is included to clarify what evidence would be required. There also appears to be no acknowledgement within the Policy that the provision of this accommodation may impact on the viability and deliverability of a development, and that it may not be appropriate from an urban design perspective. Policy 8E also states that all major housing development proposals will be required to contribute towards providing 20% of the total housing requirement to meet higher access standards (Category 2 M4(2) dwellings) and a further 1% of the overall number of housing units to meet Category 3 M4(3) wheelchair user dwelling standard. Whilst paragraph 8.28 states that financial viability testing has been undertaken to account for this requirement it is not clear within the Local Plan Viability Assessment (2017) or the 2018 Update that this has been undertaken holistically, in addition to the provision of affordable housing and the potential inclusion of bungalows, sheltered housing or extra care units, as also requested by the policy. The provision of housing for older people and others with special housing requirements is supported in principle but this is often best delivered by specialist providers, who may also need to manage the accommodation. In the case of Category	The Policy should be rewritten to be less prescriptive, allow for a greater degree of flexibility and for development proposals to be designed, and considered on a case by case basis.	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							M4(3) dwellings, it can be more appropriate for the accommodation to be provided with the specific needs of an identified end user in mind. There is an apparent conflict between the requirement referred to under 'Accommodation for children with families' for the majority of affordable housing to be 'family style housing' and the suggested dwelling mix set out in Table 8.0.1 of Policy 8A, that requires a third of affordable housing to be three bedrooms and above. As written the policy places a significant burden on major residential developments with little apparent scope for proposals to be considered on a case by case basis.			
Home Builders Federation (HBF)	LPPS909	Policy 8E		No	No	Positively Prepared Justified Effective Consistent with National Policy	If council wishes to adopt the higher optional standards for Part M Category 2 and 3 2 and 3 then this should only be done in accordance with the 2018 NPPF (para 127f & Footnote 42). It is incumbent on the council to provide a local assessment evidencing the specific case for Wyre Forest which justifies the inclusion of optional higher standards in Policy 8E.	It is recommended that the Council re-considers this policy.	Yes	
Hagley Parish Council	LPPS232	8E	Yes	No	Yes	Positively Prepared Justified Effective	There seems to be a mismatch between policies 8A and 8E. The section of 8E on families is redundant, as it adds nothing useful. The emphasis on bungalows is welcome, but it should be listed as a house type in 8A, not here. However, (1) Bungalow needs to be defined to exclude so-called dormer bungalows. (2) a specific policy is needed to prohibit the addition of a second floor to bungalows, so as to maintain the stock of them. It is likely that a significant number of older people will live in general market housing, but it is impossible to predict in the long run which ones. WFDC should accordingly require all houses to be built so that they can easily be adapted (if necessary) for older people, whenever the marginal cost of doing so is modest e.g. so that a stair lift can easily be installed.	Delete section on families with children. Define bungalows and prohibit conversion to 2-storey houses. Ensure all new houses are suitable for adaptation for elderly and disabled, whenever this can be done without a significant marginal expense.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Taylor Wimpey West Midlands	LPPS1025	Policy 8E		No		Justified Effective	Land at Rectory Lane Stourport With regard to providing evidence to demonstrate that major housing development proposals have fully considered the provisions of certain tenures and types and for the need for 487 residential units to be met on sites allocated for housing, it must be recognised that the care accommodation industry is very different to the house building industry. Whilst on the larger schemes care homes can be provided for, on smaller		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							schemes it is far more difficult to make a viable and meaningful contribution. The Council's policy should remain flexible in requiring such specialist development given the complexities. Further, it is likely that opportunity sites will exclusively come forward for homes for older people and/ or specialist housing, which may meet the needs identified. Under Policy 8E on sites of 10 or more dwellings 20% of dwellings must meet higher optional Building Regulation of Part M Category 2 accessible and adaptable homes and 1% Part M Category 3 wheelchair user homes. If the Council wishes to adopt the higher optional standards for Part M Category 2 and 3 then this should only be done in accordance with the 2018 NPPF (para 127f & Footnote 42). The Written Ministerial Statement (WMS) dated 25th March 2015 stated that "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG." Taylor Wimpey considers that this policy requirement has not been justified by the evidence base available and the higher optional standards should be removed.			considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Cadman Phil	LPPS20	8.13 and 8.14	Yes	No	Yes	Positively Prepared	Inconsistency between the statement in 8.13 - "Evidence suggests that there is a significant need for affordable housing," and the figure set aside for this - 25% of all housing (8.14). 25% is neither significant, nor appropriate, in meeting the needs of the existing local population.	"Significant" is defined as being important or substantive. The figure of 25% is neither. A figure of 40% upwards would be important, would be substantive, and would be far more appropriate in meeting your own stated policy (8.13) - "that there is a significant need for affordable housing."	Yes	I do not consider it necessary to participate at the oral examination - my objection is clear enough - but the responses above do not answer the question posed: "do you consider it necessary?" Instead, they answer the question: "do you wish to participate?" This is anomalous and misleading.
Bareford David	LPPS124	8A	Yes	No	Yes	Justified	New housing developments must be well designed and address local housing needs. The housing at Lea Castle does not satisfy local needs. The first 600 houses has not been planned to contain any affordable housing.		Yes	As before
Hagley Parish Council	LPPS231	8A	Yes	No	Yes	Positively Prepared Justified Effective	The emphasis on bungalows is welcome (in policy 8E), but it should be listed as a house type in 8A, not here. However, (1) Bungalow needs to be defined to exclude so-called dormer bungalows. (2) a specific policy is needed to prohibit the addition of a second floor to bungalows, so as to maintain the	Define bungalows and prohibit conversion to 2-storey houses.	Yes	To amplify as necessary this objection and natural justice, ensuring that the inspector hears both sides of the argument.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							stock of them			
Euro Property Investments Ltd.	LPPS787	8A	Yes	No	Yes	Justified	Table 8.0.1 sets out a suggested dwelling mix for how the annual housing requirement for both market and affordable housing could be delivered. Whilst we have no objection in principle to the Council seeking to achieve a balanced delivery of housing to meet needs, we would wish to avoid having to strictly adhere to the contents of this table when bringing forward development proposals. There are a number of different issues that need to be taken into account when bringing forward development proposals on different sites and it is clear that a one size fits all approach will not work. Whilst certain sites may be capable of achieving a good mix of properties in terms of size and type, not all sites will. We would want to avoid a situation where sites were prevented from coming forward when they did not meet size or dwelling type requirements as prescribed in the policy. Furthermore, housing needs in the District will change and evolve over the Plan Period. As such, a flexible, market facing approach to the delivery of housing should be adopted, where changes to the type and size of dwellings proposed can change so that they respond to demand. Developers will not bring schemes forward if they cannot produce a product that is in demand and which will sell. We also note the requirement for greenfield development to achieve an average density of 35 dph. Again, we have no objection in seeking to make effective use of land by aiming for 35 dph, however, it must be acknowledged that not all sites will be able to developed out at 35 dph due to site specific constraints and characteristics. The policy should state that development should aim to achieve 35 dph, but that there may be instances where a lower density would be more appropriate. Conversely, we have no objection to development achieving a density greater than 35 dph where it is appropriate to do so.	Please response to 6.	Yes	We are promoting one of the four draft residential allocations in Bewdley and therefore key to the delivery of new housing in the settlement

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 9: HEALTH AND WELLBEING

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Homes England	LPPS101	Policy 9	Yes	Yes	Yes		Homes England supports the broad principles of this policy and believes that the Lea Castle Strategic Allocation can meet a number of the requirements set out in the policy. The significant Green Infrastructure that forms part of the scheme provides opportunities for physical activity close to where people live, and the provision of land for a potential new health centre within the concept masterplan will be significant in offering the opportunity for better services in the area. This, along with a new primary school and local centre will encourage walking and cycling rather than car use. The concept masterplan includes land for allotments or community orchard to increase residents' opportunities for access to fresh food.		Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Taylor Wimpey West Midlands	LPPS637	Policy 9		Yes			Comberton Road Kidderminster The policy aspirations set out in Policy 9 are supported by Taylor Wimpey as 'sound.' Land north of Comberton Road provides a unique opportunity to provide facilities that would foster and encourage healthy, active lifestyles for new residents and the existing residents of Kidderminster by providing significant new green infrastructure and a new network of footpaths/cycleways that would encourage walking, cycling, physical activity, exercise and informal recreation. In addition, opportunities are present for the provision of a community orchard and for a new accessible health facility.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Marmaris Investments Ltd.	LPPS846	Policy 9	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	This policy seeks to introduce the requirement for most housing applications over 25 dwellings to be accompanied by a Health Impact Assessment, which will measure or balance the "wide range of social, environmental and economic factors that have an impact on human health and wellbeing". We see this as an unwarranted additional burden to be placed on development proposals at a time when Government policy seeks to significantly boost the supply of homes being delivered through the planning system. The matters to be considered		Yes	Green Belt / Transportation / Housing issues are important areas of the plan and inclusion in the debate at the examination will be useful to the Inspector

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							are all development control matters, typically assessed as part of the reserved matters applications in any event. The bringing in of a screening / scoping stage leading to a request for a formal HIA is unnecessary and not supported by NPPF or regulation.			
Taylor Wimpey West Midlands	LPPS1042	Policy 9		Yes			Land at Bewdley Road North Stourport The policy aspirations set out in Policy 9 are supported by Taylor Wimpey as 'sound.' Land north of Comberton Road provides a unique opportunity to provide facilities that would foster and encourage healthy, active lifestyles for new residents and the existing residents of Kidderminster by providing significant new green infrastructure and a new network of footpaths/cycleways that would encourage walking, cycling, physical activity, exercise and informal recreation. In addition, opportunities are present for the provision of a community orchard and for a new accessible health facility.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
West Mercia Police	LPPS563	Policy 9 (2)	Yes	Yes	Yes		West Mercia Police welcome and support part (2) of Policy 9, which states that development should be designed to minimise the potential for crime and anti-social behaviour.	Not applicable.	No	Whilst we do not consider it necessary to participate at the oral part of the examination, we would be happy to do so if the Inspector considered this to be beneficial to proceedings.
Persimmon Homes Limited	LPPS806	Policy 9	Yes	No	Yes	Justified Effective	The general aim of Policy 9 is supported, in that development is encouraged to promote health and wellbeing, which is a positive element of good urban design. Some of the listed criteria (the provision of affordable housing and the provision of dwellings that meet the needs of older people) are essentially a replication of the other policies within the plan and it is not necessary to repeat them here. In relation to Health Impact Assessments (criteria 10 of the Policy) the wording is considered to be	The Policy should be re-written so that it is clearer and more effective. At the present time it reads almost as a 'wish list' of matters that the council will encourage applicants to provide within their schemes. Some of the criteria could have significant implications for the density of development and, as a result the viability of development proposals, for example the inclusion of	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							overly restrictive and inconsistent with the Planning Act (2008). Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The statement within the Policy that planning permission will not be granted if it is established through a Health Impact Assessment (HIA) that there will be an adverse impact on health. While the principle of ensuring that development proposals do not result in a negative impact on health is supported, the Policy must acknowledge that there may be other material planning considerations, or compliance with other Policies within the Plan, that would weigh in favour of a planning application during the decision-making process. Greater clarity should be provided on the HIA process, including the screening stage. Do the Council envisage that the Department for Health – Health Impact Assessment Tools (2010) document will be used by applicants, or is a more up-to-date and locally produced document due to be provided? Paragraph 9.11 of the supporting text makes reference to the production of a Supplementary Planning Document on Health and Wellbeing, however the timetable for the production of this document and what it would contain, are not known at this stage.	allotments and orchards within developments. As stated above, the refusal of planning applications that would have a negative impact on health, with no scope to consider other material planning considerations, is inconsistent with Planning Law		
Taylor Wimpey West Midlands	LPPS1026	Policy 9		Yes			Land at Rectory Lane Stourport The policy aspirations set out in Policy 9 are supported by Taylor Wimpey as 'sound.' Land north of Comberton Road provides a unique opportunity to provide facilities that would foster and encourage healthy, active lifestyles for new residents and the existing residents of Kidderminster by providing significant new green infrastructure and a new network of footpaths/cycleways that would encourage		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							walking, cycling, physical activity, exercise and informal recreation. In addition, opportunities are present for the provision of a community orchard and for a new accessible health facility.			significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Parsonage Louise	LPPS158	9.3	Yes	No	No	Positively Prepared Justified	Consideration should be given to the impact on health and well being on the loss of green spaces caused by over-development.		No	
Sport England	LPPS253	Policy 9		No		Consistent with National Policy	Policy 9 fails to cross-refer to other policies in the plan that inter-relate to health and well-being namely Policy 20A-C. Linking the policy that promotes health and well-being with the policies for community facilities, open space, sport and recreation policies would be consistent with paragraph 96 of the NPPF, which recognizes that having access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.	To amend the wording of policy 9 by adding a cross reference to policies 20A-C.	No	
Euro Property Investments Ltd.	LPPS788	9	Yes	No	Yes	Effective	We object to the requirement to have to submit a Health Impact Assessment for all developments of 100 dwellings or more. This will just add to the cost and complexity of bringing sites forward development and make the planning application process more protracted without actually delivering any tangible benefit. Our view is that the Council should take a more concerted District wide approach to health considerations and look to plan for this accordingly at a strategic level rather than on a site by site basis.		Yes	We are promoting one of the four draft residential allocations in Bewdley and therefore key to the delivery of new housing in the settlement

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 10: A GOOD PLACE TO DO BUSINESS

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Homes England	LPPS102	Policy 10A	Yes	Yes	Yes		Homes England recognises that WFDC needs to safeguard land for economic development over the plan period. It is important that the Council regularly reviews its employment land availability and take up to ensure that the sites that are available are attractive to the market and that there is take up of these sites, avoiding sites being left vacant for too long a period of time. Regular review of employment sites and take up will enable the Council to react to any changes in circumstances throughout the plan period. Paragraph 10.12 recognises the importance of the plan being flexible and responsive to market demands. A commitment regarding regular review of employment land could be added to this paragraph to set out how the Council will seek to be flexible in response to changing circumstances or changes in the market.	A commitment regarding regular review of employment land could be added to this paragraph to set out how the Council will seek to be flexible in response to changing circumstances or changes in the market.	Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Taylor Wimpey West Midlands	LPPS638	Policy 10A		No		Positively Prepared Justified Effective	Comberton Road Kidderminster As set out above, the Local Plan gives a figure of 29ha of employment land that will be brought forward in the period up to 2036. This requirement is informed largely by the Employment Land Study 2018 undertaken by Lichfields, which identifies a decline in jobs within the District over the past 20 years. However, a concern with the 29ha employment land requirement is that it does not appear to take into account what could be needed in the event of Wyre Forest seeing stronger economic growth. For example, the Worcestershire Local Enterprise Partnership's Strategic Economic Plan has a vision to grow the LEP economy by 25,000 jobs by 2025 and to support growth sectors such as advanced manufacturing. It is unlikely that Wyre Forest will make much of a contribution to this target if its economy only grows under baseline conditions. Consideration should therefore be given to increasing the quantum of employment land brought forward by the Local Plan.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	LPPS1043	Policy 10A		No		Positively Prepared Justified Effective	Land at Bewdley Road North Stourport As set out above, the Local Plan gives a figure of 29ha of employment land that will be brought forward in the period up to 2036. This requirement is informed largely by the Employment Land Study 2018 undertaken by Lichfields, which identifies a decline in jobs within the District over the past 20 years. However, a concern with the 29ha employment land requirement is that it does not appear to take into account what could be needed in the event of Wyre Forest seeing stronger economic growth. For example, the Worcestershire Local Enterprise Partnership's Strategic Economic Plan has a vision to grow the LEP economy by 25,000 jobs by 2025 and to support growth sectors such as advanced manufacturing. It is unlikely that Wyre Forest will make much of a contribution to this target if its economy only grows under baseline conditions. Consideration should therefore be given to increasing the quantum of employment land brought forward by the Local Plan.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

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Brudenell-Pryke Penelope	LPPS86	10A	Yes	No	Yes	Positively Prepared Effective	Entrepreneurship: Some of the empty business/retail units could also be used to house a "Beta-Den" type incubator for budding tech entrepreneurs, for gaming etc. We have such young people being trained in Kidderminster and other local colleges. We don't have many large businesses now, so we should be encouraging more entrepreneurs of the future in the area. Retail: Some of the long term empty shop floor space in the town centre (e.g. old Woolworth's site) could be made into permanent sites for small local retail businesses, creating niche shopping areas. Such businesses that might be suitable would be specialist retail suppliers such as home-made/craft, comic book stores, music and books, steampunk and vintage clothing, etc. This has worked well in other towns and cities. Some of the retail stores from other areas (the Horsefair for example,) might be encouraged to move to the town centre, also relieving some of the traffic congestion in that area of town. We also have fashion designers being trained in Kidderminster via B-Met; they could be offered a permanent outlet for their senior students work. Office: Office space with parking in the town centre would encourage businesses who want a central location to relocate. The employees would bring more retail/café business during the working day. This has been shown to rejuvenate town centres.	Please see comments in previous sections.	No	
Sport England	LPPS281	10A		No		Positively Prepared Consistent with National Policy	Sport England objects to allocation LI/12 Former Club at Golf Course for proposed employment development as this would result in the loss of an existing sports facility as this does not accord with the guidance in paragraphs 96 and 97 of the NPPF. No evidence has been prepared to demonstrate that the golf course is surplus to requirements to address NPPF paragraph 97a.	Amend Table 10.0.1 to remove allocation LI12, or to include provision within the plan for appropriate investment in an equivalent or better provision of sports facilities in a suitable location to accord with paragraph 97 of the NPPF, and in accordance with the evidence in the Council's Playing Pitch Strategy and Built Sports Facilities Strategy.	No	
Taylor Wimpey West Midlands	LPPS1027	Policy 10A		No		Positively Prepared Justified Effective	Land at Rectory Lane Stourport As set out above, the Local Plan gives a figure of 29ha of employment land that will be brought forward in the period up to 2036. This requirement is informed largely by the Employment Land Study 2018 undertaken by Lichfields, which identifies a decline in jobs within the District over the past 20 years. However, a concern with the 29ha employment land requirement is that it does not appear to take into account what could be needed in the event of Wyre Forest seeing stronger economic growth. For example, the Worcestershire Local Enterprise Partnership's Strategic Economic Plan has a vision to grow the LEP economy by 25,000 jobs by 2025 and to		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the

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							support growth sectors such as advanced manufacturing. It is unlikely that Wyre Forest will make much of a contribution to this target if its economy only grows under baseline conditions. Consideration should therefore be given to increasing the quantum of employment land brought forward by the Local Plan.			Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Campaign to Protect Rural England	LPPS354	Policy 10B	No	No	Yes	Effective	The policy in the last bullet point (as to vacant space) is welcome, but the intervention of residential properties in the midst of a shopping area means people have to walk further between shops. A better solution will be to reduce the extent of the Primary Retail area, with other uses being encouraged in these areas: offices; dentists, physiotherapists and other medical practitioners. Industrial uses are probably unsuitable for a town centre. The provision of any new retail premises (as opposed to recycling existing ones) needs to be strongly discouraged, to give effect to Policy 6A. A policy on rural developments is out of place in the midst of one on Towns and should be located elsewhere, perhaps linked to rural employment as an addition to Policy 10A.		Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
West Midland Safari Park	LPPS915	10C	Yes	No	Yes	Consistent with National Policy	WMSP is generally supportive of this policy, recognising as the supporting text does the regional significance of West Midlands Safari Park as a tourist attraction. However, WMSP object to the Policy as presently drafted. The third bullet point gives the Council an opportunity to request off-site improvements and or contributions towards transport infrastructure. The policy and/or the supporting text should be amended to more closely reflect paragraph 108 of the National Planning Policy Framework so that it is made clear that such provision or such contributions will only be sought where the residual cumulative impact of developments are severe, and where it is practical and viable so to do.	The amendments should be as Policy 6C.	Yes	RPS would like to elaborate on why it is concerned the Policy as presently drafted gives the Council an opportunity to request off-site improvements and or contributions towards transport infrastructure, and how this is contrary to paragraph 108 of the National Planning Policy Framework which seeks to ensure that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 11: A UNIQUE PLACE

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reason for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Home Builders Federation (HBF)	LPPS910	Policy 11A		No	No	Positively Prepared Justified Effective Consistent with National Policy	Reference to SPD in policy is not in compliance with the regulations. The Council is referred to the recent High Court Judgement between William Davis Ltd, Bloor Homes Ltd, Jelson Homes Ltd, Davidson Homes Ltd & Barwood Homes Ltd and Charnwood Borough Council Neutral Citation Number : [2017] EWHC 3006 (Admin) Case No. CO/2920/2017.	It is recommended that these references are deleted	Yes	
Homes England	LPPS103	Policy 11A	Yes	Yes	Yes		Homes England supports the principles of this policy that seek to achieve high quality design and looks forward to the opportunity to comment on the Council's revised design guidance Supplementary Planning Guidance when it is published for consultation.		Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Persimmon Homes Limited	LPPS805	Policy 11A	Yes	No	Yes	Justified Effective	The general aim of Policy 11A is supported as good design is, as stated in Paragraph 124 of the NPPF, a key aspect of sustainable development. Policy 11A seeks to go beyond ensuring that development proposals that represent good design are supported, by stating that development will be expected to exhibit 'high quality' design. The reference to conserving and enhancing heritage assets and their setting is covered in more detail in Policy 11B and does not need to be repeated in this policy. The reference to 'within Wyre Forest District' is unnecessary as the policy clearly applies to the district. The requirement for development to 'integrate effectively with its surroundings' could, when considered at the extreme, result in development on sites that are surrounded by poor quality development having to replicate what is currently there. The reference in the NPPF (para 127 (c) to development being 'sympathetic to local character' while not preventing or discouraging 'appropriate innovation or change' would more clearly allow for development to diverge from the local contest where appropriate. Paragraph B of Policy 11A recognises this potential situation.	A. High Quality Design All development will be expected to exhibit good design. It should be sympathetic to local character and history in terms of form and function and new and innovative designs will be encouraged and supported where they enhance the overall quality of the built environment	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination.
Marmaris Investments Ltd.	LPPS849	Policy 11A	No	No	Yes	Positively Prepared Justified Effective	This policy is unnecessary and is vague and generalised in its approach and guidance. The matters covered by the policy are included in NPPF and other proposed local policies. It is unnecessary and should be deleted from the	Policy should be deleted	Yes	Green Belt , transportation and housing issues are important areas of

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						Consistent with National Policy	plan.			the plan and inclusion in the debate at the examination will be useful to the inspector
West Mercia Police	LPPS562	Paragraph 11.11	Yes	Yes	Yes		The recognition that crime and the fear of crime can affect the well-being of the District's communities is welcomed and supported by West Mercia Police. This provides the necessary underpinning for requesting the design and infrastructure measures needed to mitigate these problems in new development. This in turn will ensure the delivery of the objectives on this issue set out by paragraphs 91 of the National Planning Policy Framework (2018).	Not applicable.	No	Whilst we do not consider it necessary to participate at the oral part of the examination, we would be happy to do so if the Inspector considered this to be beneficial to proceedings.
Gladman Developments Ltd	LPPS877	Policy 11B	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The above policy seeks to protect, conserve and enhance all heritage assets and its settings. This policy is not in accordance with the requirements of the Framework as it does not allow for a distinction to be made between designated and non-designated heritage assets and the different policy tests which should be applied to each. In this regard, paragraph 196 of the revised Framework clearly states: *"Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weight against the public benefits of the proposal including, where appropriate, securing its optimum viable use."* Paragraph 197 of the Revised Framework considers development which may have an effect on non-designated heritage assets. It states that: "*The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of a heritage asset."* Consideration of the separate balancing exercises must be included within the policy wording.		Yes	To discuss the issues raised in our written submissions.
Gladman	LPPS879	Policy 11C	No	No	No	Positively	Policy 11C requires all new development to protect and		Yes	To discuss the issues

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Developments Ltd						Prepared Justified Effective Consistent with National Policy	where possible enhance the character of the landscape including individual settlements or hamlets located within it. Gladman raise concerns with this policy in relation to the fact that it requires all development to protect the landscape character of an area without considering the significance of landscape areas, and that protection should be commensurate with their status and gives the appropriate weight to their importance and contribution to wider networks. Opinions on landscape are highly subjective, therefore, without further clarity; this policy is likely to lead to inconsistencies in the decision making process and is therefore not considered to be 'effective' as required by national policy.			raised in our written submissions.
Bewdley Town Council	LPPS903	Policy 11C, Landscape Character	Yes		Yes		Support policy 11C, and the planning authority's strategic policies to safeguard and value such landscapes and countryside are commended.			
Limbrey Susan	LPPS888	Policy 11C		No		Justified Consistent with National Policy	Evidence Base Addendum 2, the Preliminary Ecological Appraisal, makes it clear why this site should not be developed. It is a valuable wildlife habitat and a component of a network of corridors linking it to ancient woodland, species-rich meadows, hedgerows and other traditional orchards, Policy 11D3 iii and iv and reasoned justification 11.30, apply here.	Re-drawing of Far Forest village boundary to exclude Land Adjacent to Tolland Bungalow.	No	
Campaign to Protect Rural England	LPPS356	Policy 11C	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	NPPF Policy 170 requires the protecting and enhancing valued landscapes. The WCC Landscape Character Assessment, is a useful tool, but serves merely to classify landscapes without determining which are "valued" landscapes. Other than the proposed Severn Valley Park, the plan also fails to do so. Older plans designated the whole area west of the Severn as a Landscape Protection Area. However such a wide-ranging designation will have no effect in determining what are and are not acceptable sites for development. We would suggest, for example, that there should be a buffer zone between Bewdley and the Wyre Forest, to protect its setting and conservation value. Some other areas of the district were identified as of Great Landscape Value in the last Worcestershire County Structure Plan.		Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Persimmon Homes Limited	LPPS804	Policy 11C	Yes	No	Yes	Justified Effective	There is a general point throughout the plan that some policies state that development 'must' comply with a		Yes	A number of relevant considerations have

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							policy, some policies state that they 'should' and other that development will be 'encouraged' to. It is not clear whether the differences that occur have been drafted that way deliberately. RPS notes that by definition, development will have an impact on the landscape of an area, whether this is on developed or undeveloped land. Presently, this policy makes no allowance for this, and would conflict with the application of the proposed allocations. The wording to 'protect and enhance landscape character' is however consistent with the approach towards valued landscapes (paragraph 170 of the NPPF) or land within the Green Belt (paragraph 141) and on this basis. The wording of Policy 11C – that development 'must' protect and enhance the unique character of the landscape makes no allowance for other material considerations to be taken into account, and any development that fails to protect the landscape would be unacceptable. It is also unclear why the landscape of Wyre Forest is referred to as being 'unique'. The second paragraph implies that the policy relates to development within the rural areas, but this is not explicit in the first paragraph.			been raised and RPS would welcome the opportunity to discuss these as part of the Examination.
Pre-submission Anonymous	LPPS848	Policy 11D-Protecting and Enhancing Biodiversity	No	No	No		Overall I believe that this revised plan for Kidderminster now satisfies the previous unplanned use of Green spaces. My primary concern when considering development in to the Green space is that wildlife value is considered first, and I am pleased to say that the new revised plans do that and so the Wilden Marsh site and the meadows off Hurcott Road have been withdrawn. Yes there will be the need for some housing around the edge of Offmore and at Lea castle but this is primarily agricultural land with less wildlife value. The maps appear to show some good wildlife corridors and green space areas at Lea Castle and the Borrington area. My hope is that the lower meadows off Hurcott Road running down off the terrace might be considered as a LNR or open green space to link with Hurcott Wood LNR.	.		
Gladman Developments Ltd	LPPS880	Policy 11D	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The above policy requires development proposals to deliver 'measurable' net gains in biodiversity. Whilst new development will often deliver improvements to existing biodiversity features, the policy lacks clarity on how a developer is expected to deliver 'measurable' net gains when this is not defined by either the policy wording or the supporting text. As such, the policy is considered ambiguous and it is unlikely that a decision maker will be	Requirement to deliver 'measurable' net gains in biodiversity should be deleted. Reference to SPD should be deleted.	Yes	To discuss the issues raised in our written submissions.

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							able to apply this policy consistently and with ease. Gladman recommend that this element of the policy is deleted. Gladman further remind the Council that it is not appropriate to require development proposals to comply with the Green Infrastructure Supplementary Planning Document (SPD). SPDs are intended to act as guidance documents for developers to consider and are not required to be strictly adhered to as they have not gone through the rigours of examination in public. Essentially this element of the policy will confer the same status as a development plan which has not been subject to the same process of plan preparation, consultation and examination. It is therefore recommended that the reference to SPDs is also deleted.			
Natural England	LPPS653	Policy 11D	Yes	No	Yes		Some of the information in the table is incorrect or missing.	Incorrect or missing details in Table 1 Missing information, which should be added: Hurcott Pasture SSSI - a good example of species-rich, lowland, acidic grassland pasture Incorrectly named SSSI's, which should be changed: Hartlebury Common and Hilldtich Coppice SSSI Showground Meadow, Callow Hill SSSI SSSI which would benefit from further information: Kinver Edge SSSI is also notified for geology. We request that the LPA makes the corrections listed above and confirms that this has been done via email in advance of the Examination.	No	
Persimmon Homes Limited	LPPS803	Policy 11D	Yes	No	Yes	Justified Effective	The requirement for planning policies to minimise impacts on and provide net gains for biodiversity is established within Chapter 15 of the NPPF and is supported in principle. Policy 11D (1) appears to go beyond that requirement by stating that the level of net gain will be proportionate to the type, scale and impact of the development. Whilst larger scale development has the potential to have a greater impact on biodiversity than smaller scale developments, there is no requirement for the scale of net-gain to be greater. As long as a development results in net-gain this would accord with the requirement in the NPPF. The level of mitigation will need to be proportionate to the level of impact that a development would have, but the degree of net-gain does not need to be higher. Policy 11D (6) requires garden boundaries to be permeable to wildlife, with Paragraph 11.36 of the reasoned	11D (1): The Council will expect proposed developments to deliver measurable net gains in biodiversity through the promotion and re-creation of priority habitats, ecological networks and the protection and recovery of legally protected and priority species populations. Delivery of measurable net biodiversity gains should be designed to support the delivery of the identified biodiversity network. Enhancements for wildlife within the built environment will be sought where appropriate from all scales of development. Policy 11D (6) should be deleted.	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination.

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							justification stating that this can be achieved through the use of 125mm2 holes/gaps in fences. This requirement would place a significant burden on the Council's enforcement officers as it is likely that this would need to be controlled through the use of an appropriately worded planning condition. It is likely that occupiers of dwellings will ultimately block the gaps as they may prove to be a nuisance, for example households with small dogs and other pets would prefer a more secure boundary treatment.			
Limbrey Susan	LPPS891	Policy 11D		No		Justified Consistent with National Policy	Evidence Base Addendum 2, the Preliminary Ecological Appraisal, makes it clear why this site should not be developed. It is a valuable wildlife habitat and a component of a network of corridors linking it to ancient woodland, species-rich meadows, hedgerows and other traditional orchards, Policy 11D3 iii and iv and reasoned justification 11.30, apply here.	Re-drawing of Far Forest village boundary to exclude Land Adjacent to Tolland Bungalow.	No	
Worcestershire Wildlife Trust	LPPS331	11D	Yes	Yes	Yes		The WWT welcome this policy and consider that it is both legally compliant and sound.		No	
Natural England	LPPS654	Table 1	Yes	No	Yes		Some of the information in the table is incorrect or missing.	Incorrect or missing details in Table 1 Missing information, which should be added: Hurcott Pasture SSSI - a good example of species-rich, lowland, acidic grassland pasture Incorrectly named SSSI's, which should be changed: Hartlebury Common and Hilldtch Coppice SSSI Showground Meadow, Callow Hill SSSI SSSI which would benefit from further information: Kinver Edge SSSI is also notified for geology. We request that the LPA makes the corrections listed above and confirms that this has been done via email in advance of the Examination.	No	
Environment Agency	LPPS957	Policy 11F Regenerating the Waterways					We note the above policy has been updated in line with our recommendations, and it now refers to Policy 15C as well as the inclusion of some further wording, we support this update.			
Pulford Grahame	LPPS867	Policy 11		No		Justified Effective	Movement of the settlement boundary does not meet the soundness test as WFDC fail to acknowledge Addendum (2) Preliminary Ecological Appraisal of potentially ecologically sensitive sights on WFDC`s list of sites for allocation in the 2018 Local Plan. October 2018 BR/RO/4/6 Adjacent to Tolland Bungalow.	The settlement boundary review has failed to take into account Addendum (2) to Preliminary Ecological Appraisal of potentially ecologically sensitive sites on the WFDC list of sites for the allocation in the 2018 plan. English Nature has also previously expressed written concern regarding the site and proposals. The only	No	

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							Summary of conclusions and recommendations Page 3 States: `The presence and positions of ancient fruit trees and tree lines on two boundaries restricts developable area and layout. Due to the nature of the ecological constraints we caution that WFDC consider removing this site from allocation in its entirety` Removing this site from the settlement boundary is supported by: • Policy 11 B Historic environment ii • Policy 11D- Protecting and Enhancing Biodiversity 2 iv This site as a whole provides a unique wildlife corridor for a multitude of species to be able to access surrounding areas, there is no alternative corridor. The area is a Biodiversity Area Action Plan in Worcestershire, any changes would have serious impact and local SSI sites should be taken into consideration	sound out come is to remove BR/RO/4/6 from the settlement boundary and not develop Orchard House in preference for other brown field sites within WFDC. Locally the village has extended with caravan sites that are now full 12 month sites as per concerns raised by Rock and District Council see minutes November 2018. The pub, school and shop are thriving with no extra amenity required		

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 12: STRATEGIC INFRASTRUCTURE

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Bareford David	LPPS125	12	Yes	No	No	Positively Prepared Effective	While the Local Plan is very specific and detailed about housing allocation, the depth of analysis of the requirements for local infrastructure, especially transport, is sadly very superficial; in summary "The Council will work closely with its partners, especially the County Council, to bring forward the appropriate, proportionate and necessary infrastructure that is required". The transport infrastructure is sadly deficient before we start on the Local Plan. The muted Kidderminster, Hagley and Blakedown bypass should have been built years ago, the southern link from the A449 to the Stourport Road and then onto the Bewdley bypass has never even been mentioned. As a fair proportion of the residents of these new houses will be working in Birmingham or the Black Country then we need better road and public transport links at the beginning to these conurbations.		Yes	As before
Campaign to Protect Rural England	LPPS360	Policy 12	Yes	No	Yes	Justified Effective Consistent with National Policy	See Accompanying Annex CPRE 12-13 Transport Annex, which deals with Hagley bypass; Torton traffic lights & approach; Mustow Green; Blakedown station; and cycling. We have seen in draft and support the transport submissions of Bromsgrove District Council (as submitted to their Cabinet) and Hagley Parish Council.	Much more detail is needed on the cost of infrastructure and how it will be delivered. The delivery of infrastructure needs to take place before the housing is built. Too often in the past the houses have been built, but the infrastructure to mitigate development has never been.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Taylor Wimpey West Midlands	LPPS720	Policy 12		No		Effective	Comberton Road Kidderminster This policy, whilst acceptable in principle, does not refer to the role of CIL and how this will be used to fund strategic infrastructure. The mechanisms by which the strategic infrastructure is to be delivered should be clearly set out to ensure that developers are fully aware of any requirements relating to their schemes so that the necessary financial planning relating to securing land options/agreements can be undertaken from the outset.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	LPPS1028	Policy 12		No		Effective	Land at Rectory Lane Stourport This policy, whilst acceptable in principle, does not refer to the role of CIL and how this will be used to fund strategic infrastructure. The mechanisms by which the strategic infrastructure is to be delivered should be clearly set out to ensure that developers are fully aware of any requirements		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect

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							relating to their schemes so that the necessary financial planning relating to securing land options/agreements can be undertaken from the outset.			of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Homes England	LPPS104	Policy 12	Yes	Yes	Yes		Homes England welcomes the Council's commitment to working with its partners to bring forward infrastructure that is required to deliver the plan. Part B of the policy may benefit from additional reference to such contributions meeting the planning obligation tests set out in the NPPF.	Part B of the policy may benefit from additional reference to such contributions meeting the planning obligation tests set out in the NPPF.	Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Hagley Parish Council	LPPS211	Policy 12	Yes	No	Yes	Justified Effective Consistent with National Policy	The Infrastructure Delivery Plan is inadequate to render the Plan Sound, due to the likely increase in traffic on A456 and A491 through Hagley.	Both Lea Castle and Kidderminster East Extensions should be deleted unless traffic issues on A456 and A491 though Hagley can be adequately dealt with.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Campaign to Protect Rural England	LPPS386	Policy 12	No	No	Yes	Justified Effective	Even though a Stourport Relief Road is no longer in the LTP4, this is a necessary scheme and cannot easily be provided elsewhere. Accordingly, the line of the proposed road should continue to be safeguarded, in the hope that it can eventually be delivered. If it is not safeguarded, it will never be possible for it to be delivered. LTP4 suffered from a severe lack of ambition for the improvement of the county's road network, no doubt imposed by austerity since the Credit Crunch.	Delete this site, so far as it would prevent the creation of a Stourport Relief Road, development proposal 33.18 should be deleted and a policy added safeguarding the proposed line of the road.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Environment Agency	LPPS958	Policy 12- Strategic Infrastructure					We support your integrated approach to strategic infrastructure in policy 11F.	We have suggested that, for some specific sites which may be reliant upon flood warning and/or contribute to flood defence infrastructure, you include some reference to such within the policy/reasoned justification.		
Taylor Wimpey West Midlands	LPPS1044	Policy 12		No		Effective	Land at Bewdley Road North Stourport This policy, whilst acceptable in principle, does not refer to the role of CIL and how this will be used to fund strategic infrastructure. The mechanisms by which the strategic infrastructure is to be delivered should be clearly set out to ensure that developers are fully aware of any requirements		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect

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<tr><th>Respondent</th><th>Response No.</th><th>Part of Document</th><th>Legally Compliant?</th><th>Sound?</th><th>DTC?</th><th>Reasons for being unsound</th><th>Summary of Response</th><th>Suggested Modifications</th><th>Attend Oral Examination?</th><th>Reason for Attending</th></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>relating to their schemes so that the necessary financial planning relating to securing land options/agreements can be undertaken from the outset.</td><td></td><td></td><td>of the plan.
Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</td></tr>
<tr><td>Highways England</td><td>LPPS604</td><td>12.7 IDP</td><td></td><td></td><td></td><td></td><td>An update to Wyre Forest’s Infrastructure Delivery Plan (IDP) will be necessary to ensure the transport implications of the plan for the SRN are mitigated and for the plan to be sound in the view of Highways England. This is likely to require policy support through the wording contained within the main Pre-Submission Plan document.
While the current IDP dated October 2018 does not record the need for an improvement at M5 junction 4 Table 3A of that document lists the Strategic Transport Infrastructure requirements and should therefore list this scheme. We have provided draft text for this as follows, which should also be used to update other such entries contained within the IDP:

Location | Project | Estimated Cost | Potential Funding Sources
M5 Junction 4 | Improvement of A491 Sandy Lane arm | TBC | S106 Developer Contributions, Government Funding, Local Enterprise Partnerships Highways England, Worcestershire County Council

We have listed potential funding sources above so that this entry will accord with the approach you have taken in recording other identified schemes. In this regard, while we consider it is reasonable to list Highways England as a potential funding source, as well other parties, this should not been taken as any commitment from us to provide funding in the future. We do commit, however, to undertake further investigatory assessment jointly with Worcestershire County Council to explore further the scope of these works, including likely costs, so that this can in future be recorded in the IDP.</td><td></td><td></td><td></td></tr>
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							Additional supporting text is likely to be necessary within the IDP to explain the need for this scheme. The details provided within this letter, and the Technical Note summarising the evidence for this assessment we have previously provided to you, should contain adequate information to explain this priority. We would however be happy to assist in any further drafting and would welcome sight of such text prior to the update of the IDP. This update should be made at the first available opportunity.			
Sport England	LPPS255	Paragraph 12.8		Yes			Sport England supports policy 12 but suggest to add sports and recreation facilities to the types of infrastructure in paragraph 12.8.	Add sport and recreation facilities to the types of infrastructure referenced in paragraph 12.8.	No	
Bromsgrove & Redditch DC	LPPS236	12	Yes	No	Yes	Justified Effective Consistent with National Policy	It is the view of Bromsgrove District Council (BDC) that unfortunately The Wyre Forest Local Plan (WFLP) is unsound, BDC do not consider that the plan is Justified, Effective, or Consistent with National Policy. The objection focuses on Policy 12 - Strategic Infrastructure and Policy, and the evidence base supporting Policy 12. BDC fail to see how the infrastructure requirements are deliverable. BDC also fails to see and how the policy is clear and unambiguous on what infrastructure is required, and when and how it is to be delivered. BDC objects to paragraph 12.3 in which it is not understood why the consideration of infrastructure funding streams would be left for a plan review to decide. If a CIL is the mechanism to fund the plans infrastructure, then it would need to be clearly timetabled, and then progressed in line with that timetable to ensure the benefits of having a CIL are realised from all the development in the plan. The Local Development Scheme states that the position on a CIL will be considered alongside the preparation of the pre-submission plan. There is no timetable for the production of a CIL and the WFLP does not clarify the position on CIL.	BDC consider that the wording of policy 12 could be amended to strengthen them and provide more clarity in relation to the mitigation required. But as the fundamental issue is with the evidence which underpins these policies, without a more robust evidence base BDC do not consider this plan can be made sound with simple policy wording changes.	Yes	To hopefully aid the inspectors understanding of the particular local circumstances specific to the objections raised.
Pre-submission Anonymous	LPPS938	Policy 12 Strategic Infrastructure					Regarding the LPR (new houses) as with many developments I've encountered on my travels around Britain do they cater for any services other than the housing itself? With current services like the NHS and Police really struggling,(e.g. Worcestershire) where are the schools, possible shops, clinics and Hospitals to cater for the influx. Are we all going to have to pile in and further congest Worcester Hospital? Our roads now see at least 1 car for every two people of our current population, and humankind's money-making short term approach with vehicles and general materialism will only further congest.			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 13: TRANSPORT AND ACCESSIBILITY

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Bareford David	LPPS126	13	Yes	No	Yes	Positively Prepared	"The location and layout of development will minimise the demand for travel" is incorrect for Lea Castle. The residents of these new houses will be working in Birmingham or the Black Country and use their own transport to these conurbations.		Yes	
Hagley Parish Council	LPPS215	Policy 13	Yes	No	Yes	Justified Effective Consistent with National Policy	The Infrastructure Delivery Plan is inadequate to render the Plan Sound, due to the likely increase in traffic on A456 and A491 through Hagley.	Both Lea Castle and Kidderminster East Extensions should be deleted unless traffic issues on A456 and A491 though Hagley can be adequately dealt with.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Campaign to Protect Rural England	LPPS359	Policy 13	Yes	No	Yes	Justified Effective Consistent with National Policy	See Accompanying Annex CPRE 12-13 Transport Annex, which deals with Hagley bypass; Torton traffic lights & approach; Mustow Green; Blakedown station; and cycling. We have seen in draft and support the transport submissions of Bromsgrove District Council (as submitted to their Cabinet) and Hagley Parish Council.	Much more detail is needed on the cost of infrastructure and how it will be delivered. The delivery of infrastructure needs to take place before the housing is built. Too often in the past the houses have been built, but the infrastructure to mitigate development has never been.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Persimmon Homes Limited	LPPS802	Policy 13	Yes	No	Yes	Justified Effective	Policy 13 A (i) states that 'proposals must (rather than should) demonstrate that the location and layout of development will minimise the demand for travel. There are two concerns with the wording of this sentence. Firstly, it is possible for proposals to include information that shows how the demand for travel could be minimised, but it cannot guarantee that the demand will be minimised. Secondly, if the intention of this criteria of the policy is that development should aim to reduce the demand for travel by private cars then it should be more explicit. There will be a demand for travel in even the most sustainable of locations / developments, whether this is by car, foot or bicycle, any often this should be encouraged rather than minimised. Policy 13 A (iii) states that proposals must demonstrate that they address road safety issues. Development proposals should not be expected to address existing road safety issues (and greater clarity should be provided on who is responsible for identifying road safety issues, as residents often have a different view on such matters that the Local Highway Authority). Paragraph 109 of the NPPF states that "development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe".	A. Proposals should demonstrate that: i. the location and layout of development will limit the need to travel; ii. they offer viable sustainable transport choices, with a particular focus on active travel modes (walking and cycling); iii. they do not result in unacceptable road safety issues; and in particular, iv. they are consistent with the delivery of the Worcestershire Local Transport Plan objectives	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination.
Pulford	LPPS869	Policy 13		No		Justified Effective	Policy 13 - Transport and Accessibility in Wyre Forest A i,	The settlement boundary review has failed to take into account Addendum (2) to Preliminary	No	

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Grahame							iii,iv There is insufficient work opportunities in Far Forest to support the proposed number of extra households . The bus service currently runs 2hrly with plans to review this service again imminently. It does not facilitate use for commuting to work. Far Forest Lea Memorial Primary school is full in most years, any extra children would need to be driven to other schools to in the locality At peak times traffic on the A4117 is at a standstill with the junction on the A456, this is a recognised accident blackspot, a further rise in vehicles will no doubt jeopardise safety and increase noise and pollution to the immediate area. We would urge for a highways assessment to be undertaken.	Ecological Appraisal of potentially ecologically sensitive sites on the WFDC lst of sites for the allocation in the 2018 plan. English Nature have also previously expressed written concern regarding the site and proposals . The only sound out come is to remove BR/RO/4/6 from the settlement boundary and not develop Orchard House in preference for other brown field sites within WFDC. Locally the village has extended with caravan sites that are now full 12 month sites as per concerns raised by Rock and District Council see minutes November 2018. The pub, school and shop are thriving with no extra amenity required.		
Homes England	LPPS105	Policy 13	Yes	Yes	Yes		Homes England supports the principles of this policy. The proposals for the Lea Castle Village have been designed to ensure that car use is minimised, through incorporation of mixed uses including a school and local centre, and through consideration of how existing bus services can divert through the site, making the services themselves more viable whilst offering a choice of modes of transport. New pedestrian and cycle links will encourage these modes of transport and mitigation is proposed to ensure that any off site capacity or road safety issues are addressed.		Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Pannell Warrick	LPPS162	13	No	No		Positively Prepared Justified	Managing Travel Demand: "the location and layout of development will minimise the demand for travel; they offer viable sustainable transport choices, with a particular focus on active travel modes (walking and cycling); they address road safety issues; and in particular, they are consistent with the delivery of the Worcestershire Local Transport Plan objectives." The Lea Castle Village development is not compliant or sound, in that it does not minimise the demand for travel, not being located close to transport hubs sufficient to cater	The local area transport links are not appropriate to support a development of the size of Lea Castle Village. It's proposed size and/or location should be reconsidered in order to comply with the LTP	No	

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							for the needs of the size of the development. Furthermore, given that the most direct route into Kidderminster Town centre, this would increase the traffic flow through the Horesefair which is already recognised as an air quality management area, as noted within the Worcestershire LTP 2018-2030. The local bus service from Kidderminster to Cookley and Caunsall was under threat in 2018. The lack of forthcoming support by the council demonstrates a lack of future planning and appropriate consideration of the impact the Lea Castle Village development will have on the local and wider area.			
Campaign to Protect Rural England	LPPS357	Policy 13	No	No	Yes	Justified Effective Consistent with National Policy	The Plan should have more provisions than mere warm words in support of the enhancement of Kidderminster Railway Station, including more Park and Ride car parking. This needs to be free (with the rail operator recovering the cost through ticket prices, in order that the car park can compete, with that at Stourbridge Junction, which is enormous but full by the end of the morning peak period. It must be born in mind that many people cost their car travel by its marginal cost (for example in fuel), rather than the actual average cost per mile; also on speed and convenience. Transport choices are not necessarily based purely on economics.	In order to promote rail-based commuting, the plan should provide for additional free parking at Kidderminster Station	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Highways England	LPPS603	Policy 13					The mitigation of cross boundary implications of growth on the SRN should receive policy support within the plan. Further this should be treated equally to requirements within Wyre Forest. In this regard we recommend that Policy 13 should be amended to list M5 Junction 4 as a strategic cross boundary improvement requirement alongside any further strategic cross boundary improvements should they be identified. We acknowledge that the view of Worcestershire County Council is also relevant to you in the final drafting of these sections and we would be happy to consider the detail of any further wording via correspondence with you.			
Marmaris Investments Ltd.	LPPS850	Policy 13	No	No	Yes	Positively Prepared Justified Effective Consistent with National	Part F of the policy refers to the Worcestershire Local Transport Plan and highlights a number of schemes that are *"the most significant for the successful implementation of the WFLPR".* One of these is the Blakedown Rail Station Enhancement	Point G should be reworded to state that "schemes that support the aims of these objectives will be encouraged"	Yes	Green Belt , transportation and housing issues are important areas of the plan and inclusion in the debate at the examination will be

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						Policy	Scheme. This particular *"scheme",* very much like the other locations raised, is in fact not a *"scheme"* but merely an unspecified ambition, lacking any definition or detail. It is vague as to intent, timescale and funding. As such it cannot be used as the basis for a development plan policy. It lacks the precision / clarity and deliverability required by NPPF and this could unreasonably prejudice the delivery of development in the absence of scheme specific details. Paragraph 13.20 confirms that the County Council's Rail Investment Strategy is only *'emerging'* at this stage. Point G is negatively phrased in any event and should be reworded to state that "*schemes that support the aims of these objectives will be encouraged".*			useful to the inspector
West Midland Safari Park	LPPS920	13	Yes	No	Yes	Effective	WMSP support section D of Policy 13 which will give priority to improving infrastructure, technology and services to support active travel (walking and cycling) and passenger transport (bus, rail and community transport) during the plan period. Paragraph 13.24 refers to the Severn Valley Railway as "one of the leading heritage railways in the UK", and "one of the major tourist attractions in Worcestershire with over 200,000 visitors annually." It also states that the potential exists to open up the line for commercial rail services. The line runs along parts of the south west boundary of WMSP. WMSP considers that the potential exists to develop a halt along the line in this location to link the two attractions and allow visitors to the Park to arrive by rail, and is in the approved Masterplan and Planning Brief for the site, although the precise details of this halt would need to be agreed between the main stakeholders. This would increase the potential for sustainable access to the WMSP site.	Consideration should be given to recognising this synergy between the District's two main tourist attractions and this should be recognised in the Policy and the supporting text.	Yes	
Marmaris Investments Ltd.	LPPS851	Para. 13.5 & 13.6	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	These paragraphs set out quite well the lack of definitive master planning for the expansion sites chosen within the plan. There is no clear link identified between the proposed housing sites at Kidderminster and the proposed expansion of Kidderminster station, even though traffic congestion in the town and the urgent need to increase the capacity of Kidderminster station are highlighted as issues to be addressed and solved by these expansion sites. Phraseology such as *'increasingly impassable' should* be avoided. A more clear and joined up strategy is required that will resolve these issues. This should not be a vague reference to expanded		Yes	Green Belt , transportation and housing issues are important areas of the plan and inclusion in the debate at the examination will be useful to the inspector

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							use of Blakedown Station as this will result in more car journeys and congestion, matters the plan is at pains to point out it is seeking to avoid.			
Highways England	LPPS602	Paragraph 13.11					Highways England is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England. The network includes all major motorways and trunk roads, and in the vicinity of Wyre Forest comprises the M5 motorway. Highways England has previously commented on the Preferred Options consultation, undertaken in 2017, and have further engaged with you since to outline the potential implications of development traffic on the SRN; specifically at M5 Junction 4. Although this part of the SRN lies within the adjacent Worcestershire district of Bromsgrove the traffic implications of development can inherently be cross boundary in nature depending on the origin and destination of journeys. In this regard M5 Junction 4 is one of two principal accesses to the SRN, along with M5 Junction 3, for longer distance and regular commuting journeys that either begin or end within Wyre Forest. Technical work carried out for Highways England, including traffic modelling, has demonstrated that the effects of Local Plan growth in Wyre Forest will be expected to exacerbate existing traffic congestion issues on the A491 Sandy Lane arm of M5 Junction 4 with wider consequences for the operation of the junction. This arm has a direct relationship with traffic accessing Wyre Forest and consequences include the blocking of traffic seeking to exit the M5 northbound off-slip resulting in queuing on the slip road. To date our assessment has demonstrated the link between these issues and local plan growth. It has demonstrated that a highway related intervention should be made in order to allow delivery of the overall growth envisioned within the plan. However the point at which such a scheme would need to be brought forward has yet to be determined. Our assessment has considered how these issues can be mitigated and has identified that further assessment will be required to outline the form of the necessary works. This scheme is anticipated to require joint works on the SRN and the adjacent local highway network as maintained by Worcestershire County Council. We will work with that authority to identify the scale and likely costs of this	Amend paragraph 13.11 to read: The District does not benefit from local access to the motorway network (M5); however, M5 Junctions 3 and 4, which lie within Bromsgrove and Dudley respectively, provide key access from Wyre Forest to the Strategic Road Network. They then provide connections to the wider West Midlands Conurbation to the north-east, Bromsgrove and Redditch to the east, and Worcester to the south via the local principal road network.		

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							scheme. To update you on the evidence we used in our assessment we can confirm that we have considered the revised development assumptions contained within the current pre-submission version of the plan. We note that some variance in the overall development quantum and balance of sites within the district has occurred since our assessment. However, while the assumptions we used at that time are not sufficiently different to suggest this would be likely to alter the results of the assessment at M5 Junction 4, the revised development assumptions will be used in later assessment work to be undertaken by us. An update to Wyre Forest's Infrastructure Delivery Plan (IDP) will be necessary to ensure the transport implications of the plan for the SRN are mitigated and for the plan to be sound in the view of Highways England. This is likely to require policy support through the wording contained within the main Pre-Submission Plan document. Policy 12 Strategic Infrastructure and Policy 13 Transport and Accessibility in Wyre Forest presently do not recognise these cross boundary issues and make little reference to the importance of SRN access to Wyre Forest. At present para 13.11 indicates only that: 13.11 (Existing)The District does not benefit from local access to the motorway network (M5); however, it has connections to the Black Country and wider West Midlands Conurbation to the north/west, Bromsgrove and Redditch to the east, and Worcester to the south, provided by the local principal road network. While semantically accurate in so far that M5 J4 lies within the adjacent Worcestershire District of Bromsgrove this does not reflect the cross boundary implications of traffic arising from Wyre Forest. We recommend the following changes in wording be made: 13.11 (Highways England proposed modification) The District does not benefit from local access to the motorway network (M5); however, M5 Junctions 3 and 4, which lie within Bromsgrove and Dudley respectively, provide key access from Wyre Forest to the Strategic Road Network. They then provide connections to the wider West			

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							Midlands Conurbation to the north- east, Bromsgrove and Redditch to the east, and Worcester to the south via the local principal road network.			
Bareford David	LPPS127	13.13	Yes	No	No	Positively Prepared	There is nothing in this plan to show that this has been addressed effectively before the proposed housing developments.		Yes	
Bareford David	LPPS128	13.16	Yes	No	Yes	Positively Prepared	Kidderminster railway station could erect a double story car park as seen at many stations along the rail network these days.		Yes	
Marmaris Investments Ltd.	LPPS852	Para. 13.21	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	Refers to Blakedown station specifically, noting that patronage is low at present. Various improvements are proposed, including enhanced user facilities and a new station car park.		Yes	Green Belt, transportation and housing issues are important areas of the plan and inclusion in the debate at the examination will be useful to the inspector.
Marmaris Investments Ltd.	LPPS853	Para. 13.22	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	Refers to limited opportunity to increase car parking for Kidderminster Railway Station and says that the opportunities for car parking at Blakedown and Hartlebury Railway Stations will be essential to accommodate anticipated rail growth in Wyre Forest. Whilst we note that car parking in Blakedown is identified at Station Yard at 36.9. we consider this is premature in the absence of completed studies and as set out above, paragraph 13.20 confirms that the County Council's Rail Investment Strategy is only *'emerging'* at this stage. No detailed evidence has been provided to confirm demand, capacity or funding mechanisms for implementation.		Yes	Green Belt , transportation and housing issues are important areas of the plan and inclusion in the debate at the examination will be useful to the inspector.
Bareford David	LPPS129	13.22	Yes	No	Yes	Positively Prepared	Kidderminster railway station could erect a double story car park as seen at many stations along the rail network these days.		Yes	
Bareford David	LPPS130	13.29	No	No	No	Positively Prepared Effective	The transport infrastructure is sadly deficient before we start on the Local Plan. There are no substantive proposals to alleviate the already poor transport networks in Wyre Forest.		Yes	
Budden Keith	LPPS17	13	Yes	No	Yes	Effective Consistent with National Policy	Report does not refer to growth of electric vehicles or refer to UK Government national electric vehicle policies or provide guidance and requirements for EV charging. My view is that the local plan should provide a requirement for both active and passive charging at new residential and commercial developments. The current norm is passive provision of "sufficient power to enable an Electric Vehicle			

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							to charge at 32amp, 7kWh with hardware compliant to IET and Office of Low Emission Vehicle standards" at all new homes with office street parking and active provision of "Chargepoints with 32amp, 7kWh hardware compliant to IET and Office of Low Emission Vehicle standards for 1 in 5 homes without offstreet parking. Leeds SPD for parking is a good example.			
Bromsgrove & Redditch DC	LPPS242	13	Yes	No	Yes	Justified Effective Consistent with National Policy	It is the view of Bromsgrove District Council (BDC) that unfortunately The Wyre Forest Local Plan (WFLP) is unsound, BDC do not consider that the plan is Justified, Effective, or Consistent with National Policy. The objection focuses on Policy 13 - Transport and Accessibility in Wyre Forest, and the evidence base supporting Policy 13. BDC fail to see how the infrastructure requirements are deliverable. BDC also fails to see and how the policy is clear and unambiguous on what infrastructure is required, and when and how it is to be delivered. BDC also notes the inconsistency in Policy 13 in that it refers to a junction enhancement scheme at Mustow Green, but this is referred to a bypass in the Infrastructure Delivery Plan (IDP).	BDC consider that the wording of policy 13 could be amended to strengthen them and provide more clarity in relation to the mitigation required. But as the fundamental issue is with the evidence which underpins these policies, without a more robust evidence base BDC do not consider this plan can be made sound with simple policy wording changes.	Yes	To hopefully aid the inspectors understanding of the particular local circumstances specific to the objections raised.
Worcestershire County Council, Planning Economy & Performance	LPPS983	Policy 13					**Sustainable Transport** Throughout the development of the plan, WCC has worked with Wyre Forest to develop the sustainable transport policy for the plan and the growth it proposes. There have been multiple elements of this work, including draft policies, transport modelling and site allocations. WCC is content with the transport policies in the plan, which prioritise sustainable transport and include some critical schemes for the district. However, the sustainable approach to rail is undermined by failure to allocate land for the further phase 2 expansion of Blakedown station and associated car parking provision. Although this may appear to be a minor matter, the consequence of this is to undermine the sustainable transport strategy which WCC have sought to achieve through the Local Transport Plan 4 and the Rail Investment Strategy, and its impact may be wider than WFDC itself. Rail travel offers an alternative to road-based travel, particularly for local commuting into and out of the West			

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							Midlands conurbation, not only for existing and new residents, but more widely, and is an opportunity to deliver modal shift from car to rail transport which is more sustainable and will assist in reducing congestion. Delivering the phase 1 and 2 expansion of Blakedown station is critical, because to secure future funding from Government - directly or indirectly - for road improvement schemes, WCC must be able to demonstrate that all reasonable alternatives have been explored and the opportunities for sustainable travel prioritised and delivered. Failure to allocate land for the phase 2 of Blakedown station totally undermines this case. A suitable area of land was submitted to the plan through the call for sites, but unfortunately has not been included in the draft plan, despite it being (with regard to transport) a sustainable location. This requirement was outlined in WCC's adopted Local Transport Plan 4, and has been discussed with Wyre Forest DC officers at a number of meetings concerning the Local Plan. Through the Duty to Co-operate we would like work together to address this omission, and to develop a solution which enables us to deliver the required expansions and sustainable transport aspirations of the Wyre Forest Local Plan and the Local Transport Plan.			
Asby Marc	LPPS5	13.21	Yes	Yes	Yes		No comment - Modification provided.	The train station at Blakedown is very convenient and is long overdue some work to enhance it. However, my concern specifically lays with the car park. This is to be situated opposite to where I live (on the old brownfield site formally Callow) and as such any issues would affect myself and my family greatly. The specifics are surrounding ASB/crime during the evening night, light intrusion into my property and fencing. The village of Blakedown has of late been more a victim of ASB and I fear that having an open air car park in a quiet location will attract motorists outside the village to use as a meeting point. This will inevitably involve the playing of music, drug taking and matters to outrage public decency. In addition to this, criminals will also use the car park to deal drugs/otherwise and also potentially scope potential burglary targets. The local Police are	No	

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								already stretched and will not have the resources to patrol this and instead would rely on British Transport Police to do so given that this will be railway property. Given that their parade stations are a fair distance away it would be highly unlikely that it would ever get patrolled. The request would be to have open and closure times limited to 0700 - 1900 hours daily. I would also suggest that lighting of the area is also limited to these hours to prevent light intrusion into adjacent homes such as mine. Finally fencing needs to be adequate to prevent sight of the vehicles and also noise.		
Jenkins Rachel	LPPS200	13 and 6	No	No	Yes	Justified	I welcome and agree with Bromsgrove District Council's Response to the Wyre Forest District Local Plan Pre-Submission Publication (October 2018). There has been no road infrastructure in North Worcestershire since the 1960-70's. The impact on Hagley regarding the increase of homes in Kidderminster in the given areas in the Wyre Forest District Plan will affect Hagley via the A456 and A491 in increase traffic, congestion and pollution. As stated in the WFDP over 40% of residents commute to Birmingham\Worcester and with plans to develop business and industry traffic will continue to increase to those area and regional and national connection via major infrastructures of the M5/M6 and M5/M42/M40 of which Hagley is the quickest route to access these networks. Worcestershire's Local Transport Plan 4 (LTP4) does not include any work towards or plans for any major road infrastructure in the Wyre Forest District Council and Hagley (A456 and A491). This goes against point A,iv of Policy 13 that the Transport and Accessibility proposals are: "they are consistent with the delivery of the Worcestershire Local Transport Plan objectives". This is not so. The LTP4 in relation to Hagley is the NEST6/7. Nest 6 only states: "A complete review of a number of junctions in Hagley to assess capacity, traffic flows, design and signalling apparatus (where provided) for all suitable transport modes, to identify whether capacity and/or safety improvements are required.		Yes	I represent residents who will be directly effected by this plan.

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							If so, this will be followed by a detailed design process to identify a costed improvement scheme to tackle identified issues and constraints." This work however was completed before the end of the LTP4' s first Public consultation with no action to be taken as there isn't much to be done to the junctions to help the traffic flows. Work done by developers on the A456/Worcester Road junction has actually increased congestion and queuing in Hagley increasing by 40-60% (instead of only 20% estimation given by the developers) causing tailbacks on the A456 towards Kidderminster. As yet there is no mention in the LTP4 of any relief road or bypass for Hagley and so no indication of any funding streams. If the junction work mentioned previously has been superseded by a bypass then where is the money or work to justify this? To expect developers (as stated in the WFDP) to fund major infrastructure is ridiculous and money has to become available from central government for economic regeneration of Kidderminster and the Black Country. Until there is a realistic proposition with funding allocated the WFDP is flawed and cannot be considered sustainable. To state: 6.50 "Transport links between the urban and rural areas should be improved to increase the sustainability of the relationship of the areas;" is not enough with out evidence, facts, strategy and finance. The document is very stand-alone and does not consider any impacts their plan will have on the surrounding population and road infrastructure. This plan has not taken into account any plans that Sandwell, Dudley, South Staffordshire, Shropshire and Bromsgrove have for future growth.			
Pulford Grahame	LPPS868	Policy 13		No		Justified Effective	Policy 13 - Transport and Accessibility in Wyre Forest A i, iii,iv There is insufficient work opportunities in Far Forest to support the proposed number of extra households. The bus service currently runs 2hrly with plans to review this service again imminently. It does not facilitate use for commuting to	The settlement boundary review has failed to take into account Addendum (2) to Preliminary Ecological Appraisal of potentially ecologically sensitive sites on the WFDC list of sites for the allocation in the 2018 plan. English Nature have also previously expressed written concern regarding the site and proposals . The only sound out come is to remove BR/RO/4/6 from	No	

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							work. Far Forest Lea Memorial Primary school is full in most years, any extra children would need to be driven to other schools to in the locality At peak times traffic on the A4117 is at a standstill with the junction on the A456, this is a recognised accident blackspot, a further rise in vehicles will no doubt jeopardise safety and increase noise and pollution to the immediate area. We would urge for a highways assessment to be undertaken.	the settlement boundary and not develop Orchard House in preference for other brown field sites within WFDC. Locally the village has extended with caravan sites that are now full 12 month sites as per concerns raised by Rock and District Council see minutes November 2018. The pub, school and shop are thriving with no extra amenity required.		

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 14: STRATEGIC GREEN INFRASTRUCTURE

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Homes England	LPPS106	Policy 14	Yes	Yes	Yes		Homes England supports the broad principles behind this policy, but considers that part B should include reference to site specific circumstances that may mean the required percentage of GI on site cannot be achieved. For instance it may not be possible to achieve 40% on all greenfield sites, but there may be good reasons why this is not possible. The policy makes reference to viability, but not to other site specific circumstances/constraints that may need to be taken into account.	Homes England supports the broad principles behind this policy, but considers that part B should include reference to site specific circumstances that may mean the required percentage of GI on site cannot be achieved. For instance it may not be possible to achieve 40% on all greenfield sites, but there may be good reasons why this is not possible. The policy makes reference to viability, but not to other site specific circumstances/constraints that may need to be taken into account.	Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Campaign to Protect Rural England	LPPS362	Policy 14	Yes	No	Yes	Justified Effective	Very small areas of public Open Space are largely useless for any kind of recreational activity. Areas of Open Space should be large enough for a Play Area or for a football to be kicked about. They should be located away from roads for the safety of children playing (unless suitably fenced). An exception may be linear open spaces (e.g. footpaths). WFDC should accept contributions in lieu of actual provision for small sites, with a view to collecting funds to provide or enhance a larger facility.		Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Euro Property Investments Ltd.	LPPS789	14	Yes	No	Yes	Effective	The policy requires the provision of 40% of a greenfield site in excess of 1 hectare in size to accommodate green infrastructure. Whilst in principle we have no objection to the need to provide green infrastructure in new residential development, we object to this blanket requirement to achieve 40% on all sites. The policy has no regard to the site specific circumstances of individual sites, nor does it in our view take into account the need to accommodate a number of other development specific requirements such as SUDS for example. Where these, along with open space, landscaping, roads and circulation space are provided, it is highly questionable whether all these can be accommodated on site, along with 40% green infrastructure and for the site to actually be able to deliver the quantum of development that is envisaged for it. The requirement to deliver 40% green infrastructure on all sites could have the adverse impact of actually reducing the overall level of housing that is delivered. This would impact on the delivery of market housing, but would also result in a reduction in the amount of affordable housing that would come forward. The policy as drafted is not sound as it will not be effective in terms of delivering the development needs of		Yes	We are promoting one of the four draft residential allocations in Bewdley and therefore key to the delivery of new housing in the settlement

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							the District. In order to address this concern, we would like to see the policy reworded so that the 40% requirement was an aspiration but that there is an acknowledgement that in certain cases and on some sites it will not be possible to achieve the stipulated level of green infrastructure, and that in these cases, it would not result in a reason to withhold planning permission.			
Richborough Estates	LPPS821	Policy 14-Strategic Green Infrastructure		No		Justified	Policy 14 is not justified by the open space evidence base and could compromise the plan's ability to effectively meet the district's housing needs over the plan period.	40% requirement for green infrastructure to be modified in policy to reflect the local evidenced needs.	Yes	We would welcome the opportunity to attend the examination hearing sessions to discuss the issues we have identified which affect the soundness of the plan, and to meet with the Council to discuss the above evidence base when it is further evolved.
Environment Agency	LPPS960	Policy 14-Strategic Green Infrastructure		No		Justified Effective Consistent with National Policy	We support your approach to incorporating, protection/enhancement of GI within the Locality – we would encourage GI that would help to enhance and maintain habitat for those species protected under the Conservation of Habitats and Species Regulations 2010.	Within Policy 14 we would recommend the addition of the need to enhance blue infrastructure: We would seek appropriate blue infrastructure i.e. 'blue' landscape elements are linked to water such as pools, pond and wetland systems, artificial basins or watercourses. Along with green infrastructure they help form an interconnected network of environmental enhancements within and across catchments. We would also welcome identification of opportunities for and measures to secure net gains for biodiversity, and other environmental improvements, in line with the NPPF recent revisions.		
Taylor Wimpey West Midlands	LPPS1029	Policy 14		No		Justified Effective	Land at Rectory Lane Stourport This policy requires new development to contribute positively to the District's green infrastructure network and requires a proportion of each site to be dedicated to green infrastructure. There is concern that this requirement will negatively impact upon a number of policies set out above, including housing land supply,		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.

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							density and viability. The inclusion of a specific percentage is too prescriptive and green infrastructure provision should be considered on a site by site basis.			Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Worcestershire Wildlife Trust	LPPS334	Policy 14 Strategic Green Infrastructure	Yes	Yes	Yes		The WWT welcomes this policy and consider that it is both legally compliant and sound.		No	
Natural England	LPPS652	Policy 14 (Biii)	Yes	Yes	Yes		Minor amendment would improve policy.	If there is scope to make a minor amendment to the plan, then we consider that the following change would improve policy 14. We note that you have not given a specific figure for the provision of green infrastructure (GI) on brownfield land. We suggest that you add in a proviso for circumstances where you may need to require a certain amount of GI for a proposal. For example for onsite mitigation for impacts on a protected site or where brownfield sites have high environmental value.		
Persimmon Homes Limited	LPPS801	Policy 14	Yes	No	Yes	Justified Effective	Policy 14 is titled 'strategic' green infrastructure, but none of the references to GI within the policy and the reasoned justification include the prefix 'strategic' and further clarification would be welcome on this. The policy requires 40% of greenfield sites to be directly delivered as GI, subject to viability. This appears to be a significant proportion of a site and greater clarity should be provided in terms of what would and would not be regarded as GI. If residential gardens, grass verges and incidental areas of open space, are regarded as GI then the 40% requirement would be much more achievable.	RPS would welcome the change to reflect the ability for residential gardens to contribute towards GI	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination
Gladman Developments Ltd	LPPS881	Policy 14	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Gladman raise concerns to the above policy as it seeks to safeguard the existing green infrastructure (GI) network for its own sake. The above policy could lead to inconsistencies being made through the decision making process. In addition, new development will be expected to protect and enhance Green Infrastructure assets and contribute towards additional Green Infrastructure as follows:	Specific policy requirements should be removed with GI considered on a site-by-site basis through the development management process.	Yes	To discuss the issues raised in our written submissions.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							• For Greenfield sites exceeding 1ha (gross): 40% GI • For Greenfield sites of less than 1ha but more than 0.2ha (gross): 20% GI. • For Brownfield Sites: no specific GI figure. Gladman considers that the policy requirements are overly onerous and are not fully evidenced. It should be noted that the Council's viability evidence has not tested the cumulative impact of all proposed policy requirements contained in the Plan and therefore it is unlikely that a developer would be able to provide this level of GI when taking account of other policy requirements such as affordable housing, optional building standards etc. New development will often provide new areas of GI to serve the new development through new public open space, landscape features and so on. This matter should therefore be considered on a site by site basis through the development management process rather than placing a specific policy requirement on the level of GI to be provided as this may render development proposals unviable and is contrary to the requirements of the Framework.			
Taylor Wimpey West Midlands	LPPS1006	Policy 14		No		Justified Effective	Comberton Road Kidderminster This policy requires new development to contribute positively to the District's green infrastructure network and requires a proportion of each site to be dedicated to green infrastructure. There is concern that this requirement will negatively impact upon a number of policies set out above, including housing land supply, density and viability. The inclusion of a specific percentage is too prescriptive and green infrastructure provision should be considered on a site by site basis.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	LPPS1045	Policy 14		No		Justified Effective	Land at Bewdley Road North Stourport This policy requires new development to contribute positively to the District's green infrastructure network and requires a proportion of each site to be dedicated to		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							green infrastructure. There is concern that this requirement will negatively impact upon a number of policies set out above, including housing land supply, density and viability. The inclusion of a specific percentage is too prescriptive and green infrastructure provision should be considered on a site by site basis.			amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Sandford Nick	LPPS42	Policy 14 Strategic Green Infrastructure	No	No	Yes	Justified	We welcome the strong commitment in this policy to including specified percentages of green infrastructure as part of new development. We would like to see trees and woods play a key part in this green infrastructure, including street trees, in view of the wide range of environmental, social and economic benefits provided by trees and woods when they are planted near to where people live. Our main concern about this policy is the lack of any clear commitment to giving strong protection to irreplaceable habitats such as ancient woodland and ancient or veteran trees. We do not consider that para 3 of the policy gives strong enough protection to these habitats. Ancient woodland is land which has been under woodland cover since before 1600 and hence it cannot be replaced by new planting and it is of exceptional conservation importance, as are individual ancient trees which may be found outside of woodland. We would like to see as a minimum the policy reflect the wording of para 175 of the new NPPF, which states that: When determining planning applications, local planning authorities should apply the following principles: c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons58 and a suitable compensation strategy exists; Without wording giving this level of protection to ancient woodland and ancient/veteran trees, we do not consider the plan to be in conformity with the NPPF.	Addition of a wording which is in conformity with para 175 of the new NPPF in respect of protection of ancient woodland and ancient or veteran trees.	No	

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Sport England	LPPS258	Policy 14		No		Positively Prepared Consistent with National Policy	Policy 14B only makes provision to retain, protect and enhance Green Infrastructure. It fails to reference providing new green infrastructure which is required to be consistent with other policies in the plan. In respect of part 6 of the policy Sport England objects to the exclusion of site allocations from the requirements of this part of the policy to appropriately address the loss of Green Infrastructure as this is not consistent with paragraph 97 of the NPPF.	Amend wording of Part B to read New development will be expected to retain, protect, enhance and provide Green Infrastructure… Delete the words Other than specific site allocations in the development plan from part 6 of the policy to accord with paragraph 97 of the NPPF. Amend the wording part 6ii to read Replacement of, or investment in, GI, of at least equivalent quantity and quality and of equal community and technical environmental benefit is secured in a suitable location to accord with paragraph 97 of the NPPF.	No	
Barratt Homes West Midlands	LPPS758	14- Strategic Green Infrastructure	Yes	No	Yes	Justified Effective	Wish to reduce 40% green infrastructure provision as outlined in policy 14 of pre submission plan.	The green infrastructure requirement for a greenfield site of 1 hectares or more should be reduced to 25% and the policy text to be amended to reflect that local green infrastructure provision will a consideration in establishing the exact quantum of green infrastructure that should be provided.	Yes	This is a key matter for the plan. It offsets the capacity of sites and overall housing delivery. We request the excerpts to explain the policy issues.

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 15: WATER MANAGEMENT

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Gladman Developments Ltd	LPPS882	Policy 15A	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Gladman do not consider the requirement for the higher water efficiency standard to be appropriate. The Written Ministerial Statement dated 25 March 2015 made clear that the optional technical standards should only be required through Local Plan policies if there is a clearly evidenced based need for them, and where their impact on viability has been considered. Gladman has reviewed the Council's Water Cycle Study Final Report (2017) which identifies that: *"Overall, there are no major identified issues which indicated that the planned scale, location and timing of planned development within the District is unachievable from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters."* As Wyre Forest is not a water stressed authority it is inappropriate to try and implement the higher water efficiency standards and this policy should be deleted in full.	Policy should be deleted in full	Yes	To discuss the issues raised in our written submissions.
Environment Agency	LPPS962	Policy 15 Water Conservation		No		Justified Effective Consistent with National Policy	We note that you have included a policy to secure higher (more stringent) levels of water efficiency for residential development throughout the district. In line with the approach for justifying higher levels of water efficiency policies, we have recently produced mapping which show areas of water stress and/or catchments that are likely failing due to low flows. This is within appendix A for your information/inclusion within your Water Cycle Study evidence. It should be noted that whilst this does not cover the whole area, it covers most of your district (covering the east of the district). You may want to secure higher water efficiency throughout the district as proposed in your policy to help achieve this water resource reduction objective. Note - primary sources of evidence which might support higher water efficiency standards for new dwellings are detailed in appendix A. Our map is collated based on the following sources: Water Stressed Areas Classification (2013), Water resource management plans produced by water companies, River Basin Management Plans.	Please refer to the Environment Agency's map on water resource and efficiency. You may want to secure higher water efficiency throughout the district as proposed in your policy to help achieve this water resource reduction objective.		
Taylor Wimpey West Midlands	LPPS1030	Policy 15A		No		Justified	Land at Rectory Lane Stourport Whilst it is commendable to deliver water conservation and efficiency, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. Optional new national technical standards should only be	The requirement for the higher water efficiency standard should be deleted	Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. This evidence does not appear to be present. The Water Cycle Study Final Report (May 2017) and the Addendum dated October 2018 concludes that "*overall, there are no major identified issues which indicate that the planned scale, location and timing of planned development within the District is unachievable from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters.*" This would indicate that accelerating beyond the requirements of building regulations in respect of water conservation and efficiency is not justified. The requirement for the higher water efficiency standard should be deleted.			are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Persimmon Homes Limited	LPPS800	Policy 15A	Yes	No	Yes	Justified Effective	Policy 15A - Water Conservation and Efficiency requires proposals for residential development to demonstrate that a water efficiency standard of 110 litres per person can be achieved. The NPPG states (Paragraph: 014 Reference ID: 56-014-20150327) that where there is a *"clear local need, local planning authorities can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres/person/day*". Paragraph 015 states that: *"it will be for a local planning authority to establish a clear need based on: Existing sources of evidence, Consultations with the local water and sewerage company, the Environment* Agency and catchment partnerships, *Consideration of the impact on viability and housing supply of such a* requirement.*"* Paragraph 15.1 of the Plan refers to the Wyre Forest Water Cycle Study (2017, and 2018 update) and the Wyre Forest Strategic Flood Risk Assessment (2018). None of those documents appear to include an assessment of whether a 'clear local need' exists for the more restrictive efficiency standard to be applied. In addition, whilst the Policy states that the additional cost of meeting the standard is as little as £9 per day (a 2014 DCLG document is referred to in Paragraph 15.8), this does not appear to have been included within the Local Plan Viability Appraisals that form the evidence base for the Plan.	Without evidence to demonstrate that there is a 'clear local need' the policy should be deleted.	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination.
Home Builders Federation (HBF)	LPPS913	Policy 15A		No	No	Positively Prepared Justified Effective	The optional standard of 110 litres per person per day of water efficiency should be deleted as this reduced water consumption requirement was solely applicable to water stressed areas. Wyre Forest is not identified as a water stress area.	The requirement for the higher water efficiency standard should be deleted.	Yes	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Consistent with National Policy				
Taylor Wimpey West Midlands	LPPS1007	Policy 15A		No		Justified	Comberton Road Kidderminster Whilst it is commendable to deliver water conservation and efficiency, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. Optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. This evidence does not appear to be present. The Water Cycle Study Final Report (May 2017) and the Addendum dated October 2018 concludes that "*overall, there are no major identified issues which indicate that the planned scale, location and timing of planned development within the District is unachievable from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters.*" This would indicate that accelerating beyond the requirements of building regulations in respect of water conservation and efficiency is not justified. The requirement for the higher water efficiency standard should be deleted.	The requirement for the higher water efficiency standard should be deleted	Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	LPPS1046	Policy 15A		No		Justified	Land at Bewdley Road North Stourport Whilst it is commendable to deliver water conservation and efficiency, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. Optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG. This evidence does not appear to be present.	The requirement for the higher water efficiency standard should be deleted	Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							The Water Cycle Study Final Report (May 2017) and the Addendum dated October 2018 concludes that "overall, there are no major identified issues which indicate *that the planned scale, location and timing of planned development within the District is unachievable from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters.*" This would indicate that accelerating beyond the requirements of building regulations in respect of water conservation and efficiency is not justified. The requirement for the higher water efficiency standard should be deleted.			participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Environment Agency	LPPS965	Policy 15B Sewerage Systems and Water Quality		No		Justified Effective Consistent with National Policy	Policy 15B should seek reference to the inclusion of the Water Framework Directive (WFD) objectives. We would expect your Council to help address WFD failures through its role as planner, issuing ordinary watercourse consents and as land manager. All watercourses in the district (and UK) are duty bound to reach Good Ecological Status or Potential (GES/GEP) by 2027. It is essential that WFD is fully integrated into the Local Plan process and that all future development helps to address the issues that currently prevent the watercourse from achieving GES/GEP.	We suggest the policy be amended to include – "Proposals should seek opportunities to improve water quality and help achieve good ecological WFD status". Reasoned Justification text (15.12) could include - "WFD data is available from the Environment Agency's Catchment Data Explorer tool at: http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/9"		
Environment Agency	LPPS966	Policy 15C Flood Risk Managment		No		Justified Effective Consistent with National Policy	We would support the Policy 15c subject to the following amendments.	Part ii - bullet point add – confirms "any opportunities for wider flood risk benefits" "Flood management and flood warning plan requirements" Bullet Point 5 of Policy 15cii) after 'flood storage will be maintained' could say "improved" (where possible). Additional point within 15cii: Bullet point 3 could also include "Where necessary any flood proofing/resistance measures are incorporated into the design". 15Cii) Where appropriate, the FRA could recommend contributions towards new or existing flood defence infrastructure maintenance and/or improvement where necessary and flood warning contributions where development is reliant upon that service, in accordance with the NPPG tests for such obligations. Part iii appears to duplicate some text from within the NPPG (flood risk). You could make it more locally specific by amending it/adding the following: iii) Consideration of wider benefits and opportunities, including from cumulative impact		

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								assessment, to help ensure development will be safe, and reduce flood risk in the catchment where possible. Amend Part v) so it reads: A minimum 8 m access strip is provided adjacent to watercourses for maintenance purposes. It should be appropriately landscaped for biodiversity benefits. The width of the strip may be reduced for smaller '**Ordinary**' watercourses, i.e. to separate out from those EA Main River ones.		
Worcestershire Wildlife Trust	LPPS336	Policy 15D	Yes	Yes	Yes		WWT welcome this policy and consider that it is both legally compliant and sound. In particular WWT consider that the policy meets the requirements of the NPPF and also responds appropriately to the Government's ambitious 25-year Environment Plan. Requiring SUDS that deliver biodiversity and GI improvements is in line with these documents and offers considerable benefits to the environment and the communities which utilise new development. The local plan offers a unique opportunity to properly embed SUDS in GI and GI benefits into SUDS, an opportunity that would otherwise be missed to the detriment of the environment and public.		No	
North Worcestershire Water Management	LPPS217	Flood Risk Sequential Test Evidence Document					I believe that the methodology followed needs to be set out clearer in the document. It is my understanding that sites have been included that have a fluvial flood risk in 1 in 1000 yr event or which have an area greater than 10% at risk of surface water flooding in 1:1000 yr event. I believe that the approach and presentation should be consistent for both fluvial and surface water flood risk. In addition for every site that meets the criteria it needs to be set out clearer why allocation of that particular site is believed to be appropriate despite the flood risk identified. This can be because the flood risk areas can be excluded from the development without affecting the viability, because the site is believed to be key for regeneration, because there are no suitable alternative sites available at lesser risk of flooding etc. For all allocated sites with flood risk issues it needs to be demonstrated that the proposed uses are deemed suitable and that there are sufficient policy safeguards that make these sites suitable for allocation despite the flood risk identified. Reference to site specific policies should be made so readers are aware of the development limitations that are present due to the flood risk identified. Finally it needs to be clear that developers of allocated sites will still need to provide a site specific flood risk assessment with any future planning application; passing the sequential test	1) On page 4 it is stated that 'The results of the SFRA provide the basis for undertaking the sequential and exception test to inform the allocation of development sites'. I disagree with this. I agree that the sequential test informs the allocation of development sites (or should do!), but the exception test is something that the development will need to undertake as part of a future planning application. The exception test has not been undertaken as part of the Local Plan process and will not inform the allocation of sites. 2) The section about climate change allowances is in my opinion unnecessary and not relevant. All that needs to be said is that the flood risk percentages quoted do include the impacts of climate change as the methodology used in the SFRA did attempt to make appropriate allowances for Climate Change. 3) The methodology section (page 6) does not provide information regarding the methodology followed; I did find information regarding the methodology on page 11. 4) On page 9 it is stated that sites containing greater than 10% probability of surface water are		

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							does not negate that requirement. The site specific flood risk assessment needs to include evidence that the exception test has been passed.	discussed further in the document. I believe that this needs clarifying as it is not clear whether the 10% refers to a chance or an area. Also, it is not clear what return period has been assessed. Wording could for instance be: Only sites of which more than 10% of the site area is believed to be at risk of flooding up to the 0.1 % annual probability event (1 in 1000 year) have been included in the Sequential Test. 5) Following on from point 4. I do wonder why a similar approach has not been followed for Fluvial Flooding. This would mean that only sites with a site area of more than 10% in flood zone 2 or 3 would be discussed further in the document. For the remainder of the sites it would be assumed that the development can be allocated outside the area at risk of flooding. Only sites where this is not the case (conversions) would need to be included. I believe that all types of flooding should be treated equally as it does not matter from what source people flood. Therefore a consistent approach would in my opinion be best. 6) The table on page 9 (flood risk vulnerability and flood zone compatibility) does not mention that this compatibility is after the sequential test has been passed first. The first step is always to ensure there are no sites available for development that are lesser risk of flooding. Then if there is no alternative site available certain uses are classed appropriate in flood risk areas. 7) Under the review of site FPH24 + MI/26 (page 13) it is stated that the surface water flood risk will need to be considered for any development proposal. I would welcome this to be more specific. Could you for instance include that all planning proposals for development on sites at risk of surface water flooding must be accompanied by a Flood Risk Assessment which should ensure that the development is safe and also looks to reduce the overall level of flood risk through the layout and form of the development, and through the appropriate application of sustainable drainage techniques (sentence copied from page 15 where this has been included for a site with fluvial flood risk). 8) Under the same review on page 13 it is included that 'overall it is considered that		

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								development will be suitable for the sites'. Based upon what?? 9) Under the same review on page 13 it is stated that 'sites that are located in higher flood risk zones are all previously developed sites where it is considered that they provide real regeneration potential'. The 2012 sequential test concluded something similar for certain sites but perhaps a bit more elegantly: It is considered that the uses proposed, the policy safeguards included, and the regeneration potential of the sites make them suitable areas for allocation. 10) I believe that surface water flood risk information should get included in the tables, such as the tables on page 14/15. 11) I think it is inconsistent that fluvial flood risk maps have been included in the document, but surface water flood risk maps haven't. This again gives the impression that fluvial flood risk is somehow more important. 12) For the readability of the document I wondered whether only sites that need to be assessed in the document could be included in the main document, with all other sites simply being included in an appendix (which is basically repeating the conclusions of the SFRA anyway). 13) On page 15 it is stated that 'in principle residential development can be allocated within the development plan for sites falling within FZ2'. I like to add that this is only the case if the sequential test has been passed first (there are no alternative sites available at lesser risk of flooding). See also point 6. 14) Maps like the one included on page 17 are somewhat confusing as red lines are used both to indicate the site boundary and the boundary of flood zone 2). This is the same for a number of other maps. 15) On page 28 the fact that land was previously development seems to be used as a justification for developing in flood zone 2 and 3. I don't think that this is a valid reason. 16) On page 32 the fact that sites meet the development strategy of the emerging Local Plan is used as a justification. I don't really know what is meant, and doubt that this would be a valid reason. For instance the strategy to build x		

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								amount of houses in Kidderminster area does not mean that this would warrant building them in flood risk areas if sites at lesser risk of flooding would be available within the Kidderminster area. 17) On page 67 and 69 east and west has been mixed up. It is the western side of the site that is top be allocated for open space use as it is at risk of flooding.		
Environment Agency	LPPS964	Policy 15 Water Conservation		No		Justified Effective Consistent with National Policy	Text in paragraph 15.5 not entirely accurate.	We would suggest to remove this line and suggest you replace it with the following: "The Wyre Forest area covers surface and groundwater bodies that are either at risk of or have been impacted by abstraction. In areas such as this the Environment Agency is working with abstractors including water companies to reduce the impact of abstraction on the environment and bring it to more sustainable levels". For non-residential, we would recommend that you could also include – "Ensuring/supporting developments that follow the water conservation hierarchy. Where standards currently exist for a particular non-domestic building type in BREEAM, maximum points should be scored on water and a minimum of 25% water savings for any other development";		
Severn Trent Water Ltd	LPPS1052	Policy 15	Yes	Yes	Yes	Positively Prepared	Policy 15A, B and C Severn Trent is supportive of the following policies 15A – Water Conservation and Efficiency, 15B – Sewerage Systems and Water Quality, 15C – Flood Risk Management and 15D – Sustainable Drainage Systems (SuDS).		No.	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 16: POLLUTION, MINERALS AND WASTE

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
The Coal Authority	LPPS606	Policy 16A	Yes	Yes		Positively Prepared Justified Effective Consistent with National Policy	**Coal Issues in Wyre Forest District** As you will be aware, the Wyre Forest District Council area has 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. Within the plan area there are approximately 52 recorded mine entries and 2 coal mining related hazard has been reported to The Coal Authority through its emergency procedures. A range of other mining legacy features are present in the District. In total The Coal Authority High Risk Development Area covers approximately 2% of the Council area. 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 Planning Authorities to ensure that site allocations and other policies and programmes will not lead to future public safety hazards. No development should take place over mine entries even when treated. Although mining legacy occurs as a result of mineral workings, it is important that new development recognises the problems and how they can be positively addressed. However, it is important to note that land instability and mining legacy is not always a complete constraint on new development; rather it can be argued that because mining legacy matters have been addressed the new development is safe, stable and sustainable. As The Coal Authority owns the coal and coal mine entries on behalf of the state, if a development is to intersect the ground then specific written permission of The Coal Authority may be required. **Specific Comments on the Wyre Forest Local Plan Pre Submission Publication (October 2018)**			

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							The comments the Coal Authority would like to make are: **Policy 16A – Pollution and Land Instability** **Test of Soundness** **Positively Prepared** / **Justified** / **Effective** / **Consistency to NPPF** / **Legal & Procedural Requirements Inc. Duty to Cooperate** **Yes** / **Yes** / **Yes** / **Yes** / **Yes** **Support** – The Coal Authority supports the inclusion of this policy which identifies that where land stability is identified it should be full addressed as part of the development. **Conclusion** The Coal Authority welcomes the opportunity to make these comments. The Coal Authority also wishes to continue to be consulted both informally if required and formally on future stages.			
Campaign to Protect Rural England	LPPS366	Policy 16A	No	No	Yes	Justified Effective Consistent with National Policy	The policy is generally good, but seems only to apply to filled land. Part of the district is within the Wyre Forest Coalfield, where in the past underground mining took place.	The reference to filled land should be replaced by "filled or mined land"	No	This is probably a minor issue, which we would hope WFDC can accept without argument.
Environment Agency	LPPS967	Policy 16A Pollution and Land Instability		No		Justified Effective Consistent with National Policy	Suggestion of re wording policy. Would support inclusion of the need for developers to consider our Groundwater Protection position statements in relation to protection of groundwater.	Suggest to include this sentence- "We would encourage the parallel (twin) tracking) of an Environmental Permit application with the planning application to provide reasonable degree of certainty on the land use planning impacts and pollution control measures". You could say that "These applications should provide an appropriate level of detail to inform a reasonable degree of certainty on the planning application and to ensure the principle of the development and use of the land is acceptable with cross reference to permitting constraints". We would support the inclusion of the need for developers to consider our		

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								Groundwater Protection position statements in relation to protection of groundwater. (recommend put a link to it in the reasoned justification 16.6).		
Worcestershire County Council, Planning Economy & Performance	LPPS981	16B					Part 3 of policy 16B should not be included. Mineral development, and the development of policy relating to mineral development, is a County Matter and, as such, is beyond the remit of the Wyre Forest Local Plan. Policies on protecting and enhancing the environment and amenity will be included in the emerging Worcestershire Minerals Local Plan, and this section of the policy should be deleted. **Site Allocations** Not all allocated sites should be fully exempt from mineral safeguarding requirements and, as such, the footnote in Policy 16B should either be removed or amended. The allocations and their individual policies as drafted do not optimise require partial extraction or incidental recovery of mineral resources either in advance of development taking place or in phases alongside it. This is contrary to paragraph 206 of the NPPF, which states that "Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working". The emerging Minerals Local Plan (Fourth Stage Consultation) will state that "Site allocations which do not make reference to safeguarding, or where requirements for safeguarding mineral resources and/or supporting infrastructure are outlined, will not be exempt." As the Mineral Planning Authority, we seek to work with Local Planning Authorities to review potential site allocations and ensure that the requirements for mineral safeguarding are included, to ensure that requirements for partial extraction or incidental recovery will be delivered for sites within Mineral Safeguarding Areas. The list of allocations which need to take account of safeguarding issues is too long for this comment box, so is attached as an Appendix.			
Worcestershire County Council, Planning Economy & Performance	LPPS982	16C					We welcome the recognition of waste matters and the reference to the Waste Core Strategy in paragraphs 16.22-16.29. However, we do not consider that the policy is sound as currently drafted. The points included in the reasoned justification (such as expecting future developments to implement the waste hierarchy and address the waste implications of the development, and safeguarding existing and permitted waste management facilities, as well as the issue of incorporating facilities for storage and separation of waste in new development which is included in policy 16C) are already addressed within the adopted Development Plan in policies WCS16 and WCS17 of			

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							the Waste Core Strategy. We suggest that the section could be retained to direct developers to the requirements of the Waste Core Strategy, but that it is unnecessary to include Policy 16C itself. If, however, Policy 16C is retained, the wording of the policy is not sound. It currently states that "Waste management facilities should be well-designed", and if this is taken as it reads - in that it applies to applications for waste management development - we consider that this is beyond the remit of the Wyre Forest Local Plan and should be deleted. However, it may be that the intention is for the point to relate to the earlier sentence of the policy requiring all new development to incorporate facilities for the storage and separation of waste for recycling and recovery and that these should be well-designed. If so, we would suggest replacing "Waste management facilities" with "Such facilities".			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 17: DEVELOPMENT MANAGEMENT INTRODUCTION

THERE WERE NO RESPONSES TO THIS SECTION

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 18: A DESIRABLE PLACE TO LIVE

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Gladman Developments Ltd	LPPS883	Policy 18A	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The above policy requires an applicant to demonstrate that the policy requirements contained in the Local Plan would render a development proposal unviable. Gladman remind the Council that the viability evidence supporting the Plan has not tested the cumulative impacts on viability. As such, it is unlikely that future development will be policy compliant and viability negotiations will occur more frequently rather than exceptionally undertaken. It is the Council's responsibility to ensure that the Plan does not create viability burdens of policy requirements which will affect the deliverability of development proposals. The only way this can be remedied is through the reassessment and reconsideration of policy choices through further viability work. Gladman reserve the right to comment on this issue at a later date.		Yes	To discuss the issues raised in our written submissions.
Home Builders Federation (HBF)	LPPS914	Policy 18A		No	No	Positively Prepared Justified Effective Consistent with National Policy	The Council has not robustly viability tested the cumulative burden of its proposed policy requirements as set out in **Policy 8**. It is highly likely that most future development will not be policy compliant and viability negotiations will be routinely rather than exceptionally undertaken. It is recommended that the financial viability impacts of all policy requirements set out in the Local Plan are re-assessed and re-considered.	It is recommended that the financial viability impacts of all policy requirements set out in the Local Plan are re-assessed and re-considered.	Yes	
Woodhall Joan	LPPS644	Policy 18B		No	No	Positively Prepared Justified Effective Consistent with National Policy	The changes to settlement boundaries in Far Forest which now include land adjacent to Tolland bungalow, BR/RO/4 seem to ignore WFDC's own ecological appraisal at one in 2018. There are several ancient trees and old hedges bound this site. Policy 11B Historic Environment ii supports this site's removal and Policy 11D protecting and enhancing biodiversity 2 iv reinforces that this is a wildlife corridor for may species. To destroy it for housing and access roads would have a lasting effect. Orchard House BR-RO-6 infill policy 18B residential infill development I, ii, iv, vii, viii - the properties surrounding Orchard House are all bungalows. This site also contains old trees (countryside manager 2018). Two bungalows have legal access to this site as the outfall for their septic tanks. Part of the orchard shown as Orchard House is in separate ownership and not for sale for development. New buildings would need to echo existing bungalows rooflines. the B4117 is very busy, traffic regularly exceeds the speed limit. Creating more vehicular access onto it would only increase the number of accidents cars have been written off exiting the shop car park. Plough land and Orchard House drive are often obscured by lorries parking to buy food at the shop and by the Baptist Church congregation. The Lem Hill Nursery site BR-RO-2 also has sensitive ecological issues and the speed of traffic also applies here. Street lighting would also impact as would increased traffic.	Development of BR-RO-4, BR-RO-6 and BR-RO-2 would alter our village and destroy ecology. Any children in the new developments wouldn't necessarily be able to go to Far Forest School, we have locals already who go elsewhere as no places from them. Low cost housing wouldn't necessarily benefit local youngsters, we already have low cost housing in New Forest Close - not all are local people. There are no jobs here, the pub is an 'eatery' not a social hub. Other sites exist with easy access to Kidderminster/Birmingham/Worcester. Develop these instead.	No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 18: A DESIRABLE PLACE TO LIVE

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Pulford Grahame	LPPS870	Policy 18b		No		Justified Effective	Policy 18B - Residential Infill Development i , ii, iv Infill of the proposed area with dwellings would be uncharacteristic in this part of the village. Locally properties are detached and scattered. WFDC local plan officers have suggested up to 18 dwellings on the site. This density would be more than expected in town planning let alone village planning. Being mindful of the fact that mainly bungalows or low set cottages border the boundary for the proposal, 2 storey buildings would impact hugely on light and lead to over shadowing and not be in keeping.	The settlement boundary review has failed to take into account Addendum (2) to Preliminary Ecological Appraisal of potentially ecologically sensitive sites on the WFDC list of sites for the allocation in the 2018 plan. English Nature have also previously expressed written concern regarding the site and proposals. The only sound out come is to remove BR/RO/4/6 from the settlement boundary and not develop Orchard House in preference for other brown field sites within WFDC. Locally the village has extended with caravan sites that are now full 12 month sites as per concerns raised by Rock and District Council see minutes November 2018. The pub, school and shop are thriving with no extra amenity required.	No	
Watkins Robert	LPPS600	Policy 18B	No	No	No	Positively Prepared	The Housing Needs Study (2018) shows an average demand of 276 dwellings/year over the plan period. Over the last 10 years (2008 - 2018) average net completions have been 248, so the target of 276 is achievable. However sub-area data is presented by political wards (e.g. Tabled 4.1; 4.2) three of which are geographically large and contain a mixture of town (or large nucleated villages) and extensive rural areas. The translation of Housing Needs Data by ward into site allocation policies is logical and transparent in the two large uban areas of Kidderminster and Stourport. However such a direct translation is not possible in Bewdley and Rock; Wribbenhall and ARley; and Wyre Forest Rural (which contains the nucleated settlements of Cookley, Wolverley, Chaddesley Cotbett and Blakedown). It is therefore not possible to conclude whether or not the housing allocation for these 3 areas is a sustainable way a meeting the objectively assessed housing needs. This is especially so as there are no specific new allocations for Wolverley, Cookley and Blakedown, all 'sustainable' settlements, and only one small	Policies 18B and 36 require modifications to better reflect disaggregated data on housing needs. The policies should also insist that new dwellings are for local need and/or affordable by making an explicitly link to Policy 6B Table 6.0.3	Yes	Until the LPA presents disaggregated data it will not be possible to come to firm conclusions. There is no other opportunity to make representations other than at the oral examination.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							allocation (BR/BE/1) in Bewdley Town, this having an estimated capacity of just 15 dwellings (Table 34.0.1). Even though the Settlement Boundaries of Rock, Bliss Gate, Callow Hill and Far Forest have been extended slightly, and that for these Policy 18B applies, I still conclude that the rural housing allocations policy 36 Villages and Rural Sites is 'unsound' as it has not, in part, been 'positively prepared', by having a clear link to data on housing need.			
Bateman Foley & Anita	LPPS645	Policy 18B	Yes	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	Settlement boundary changes in Far forest do not meet soundness test as WFDC fails to take account of its own Preliminary Ecological Appraisal Addendum 2 undertaken in October 2018 in relation to BR/RO/4 adjacent to Tolland Bungalow. Summary of conclusions and recommendations P.3 state "The presence and positions of ancient trees and tree lines on two boundaries restricts developable area and layout. due to the ecological constraints we caution that WFDC consider removing this site from allocation in its entirety". Policy 11B Historic environment ii supports this sites removal Policy 11D Protecting and Enhancing Biodiversity 2iv - this land provides a wildlife corridor for may species, its destruction or housing or access roads would have an important impact now and in the future. The old hedgerow to the east of Plough Lane along footpath 541 also supports may species. Settlement boundary changes relating to BR-RO-6 Orchard House Policy 18B Residential Infill Development I, ii, iv, vii, viii infill dwellings on this site would be surrounded by the following bungalows - Coppice View, Tolland, Shemara, Lawn View and Berllan Celros there should not have a higher roof line. The density of the development would need to take into account that this site also contain old trees as identified by the Countryside Manager in early 2018. Lawn View and Berllau Ceiros have septic tanks in this site which they have a legal right to access for maintenance as this land originally belonged to both bungalows. Alternative drainage arrangements would need to be made by a developer or avoid building over the tanks and soak-away areas thus considerably reducing the development potential. Vehicular access onto extremely busy A4117 would involve demolition of Orchard House or through ecological sensitive land adjacent to Tolland bungalow into Plough Lane. In both cases increasing traffic at two junctions which are often obscured by lorry and tractor drivers parking while visiting the shop, Baptist Church worshippers add frequent in and out traffic to The Plough Inn and shop which causes congestion.	Development of BR-RO-6 and BR-RO-4 should not take place both for ecological reasons and it would destroy the existing nature of the village. Other sites in the parish at Pound Bank, Rock, Bliss Gate, Heightington could be available for housing which would take traffic pressure off the busy A4117. Pupils from these areas are already bussed to Far Forest School.	No	
Limbrey Susan	LPPS890	Policy 18B		No		Justified Consistent with National Policy	**Far Forest Village Boundary** has been drawn to include **Land Adjacent to Tolland Bungalow**, a small relic traditional orchard, so identifying it as a **potential site for infill housing (Policy 18B**) and putting it at high risk of destruction prior to any planning application being submitted. Its owner is not known to local people and has no other interest in the village.	Re-drawing of Far Forest village boundary to exclude Land Adjacent to Tolland Bungalow.	No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 19: PROVIDING ACCOMMODATION FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Stourport on Severn Civic Society	LPPS365	Policy 19 Providing accommodation for Gypsies, Travellers and Travelling Showpeople	Yes	No	No	Justified	Objection to policy 19 as these sites should be dispersed across the district and not concentrated in Stourport. The plan did not receive the publicity it should have done and many local people will be unaware of how it will adversely affect them. The consultation form is not user friendly and does not encourage response.		No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 20: COMMUNITY FACILITIES

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Campaign to Protect Rural England	LPPS364	Policy 20B	Yes	No	Yes	Justified Effective	Very small areas of public Open Space are largely useless for any kind of recreational activity. Areas of Open Space should be large enough for a Play Area or for a football to be kicked about. They should be located away from roads for the safety of children playing (unless suitably fenced). An exception may be linear open spaces (e.g. footpaths). WFDC should accept contributions in lieu of actual provision for small sites, with a view to collecting funds to provide or enhance a larger facility.	WFDC should accept contributions in lieu of actual provision for small sites, with a view to collecting funds to provide or enhance a larger facility.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Home Builders Federation (HBF)	LPPS916	Policy 20C		No	No	Positively Prepared Justified Effective Consistent with National Policy	The council should seek contributions to meet open space requirements originating from new development only.	It is recommended that **Bullet Point (iii)** is amended as follows :- iii. Contributions towards the enhancement and creation of new areas of open space and / or sports facilities where ~~a local deficiency has been identified and/or where~~ the development will lead to a deficiency ;	Yes	
Homes England	LPPS107	Policy 20C	Yes	Yes	Yes		Homes England supports the broad principles of Policy 20C relating to the provision of open space, sports pitches and outdoor community uses in housing development. However, the wording of the seventh bullet point implies that new development should address existing deficiencies in the provision of play and open space rather than providing for the new requirements associated with the development. The Council may wish to consider re-wording this element of the policy. In the case of the district wide requirement for 3G pitches, whilst these may need to be provided at the Strategic Allocations, it is anticipated that contributions towards the cost of these would come from other development schemes in the area as they are for use by all within the district.	The wording of the seventh bullet point implies that new development should address existing deficiencies in the provision of play and open space rather than providing for the new requirements associated with the development. The Council may wish to consider re-wording this element of the policy. In the case of the district wide requirement for 3G pitches, whilst these may need to be provided at the Strategic Allocations, it is anticipated that contributions towards the cost of these would come from other development schemes in the area as they are for use by all within the district.	Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Sport England	LPPS267	Policy 20C		Yes			Sport England supports policy 20C and the associated justification in paragraphs 20.14-20.19 which accords with paragraph 96 of the NPPF regarding the need to plan positively for meeting the needs for open space, sport and recreation facilities.		No	
Sport England	LPPS261	Policy 20A		Yes			Sport England supports policy 20A and the associated justification in paragraph 20.6 which accords with paragraph 97 of the NPPF and Sport England's policy guidance regarding development affecting existing sport and recreation facilities including playing fields. Sport England supports the exclusion of sport and recreation facilities from the viability test in part iv) of the policy		No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							since viability is not part of the test to be applied from paragraph 97 of the NPPF.			
Theatres Trust	LPPS77	Policy 20A	Yes	Yes	Yes		The Trust supports the protection afforded to valued community, cultural and social facilities through this policy, and that paragraph 20.2 explicitly states the policy applies to cinemas and theatres alongside other uses such as pubs, community centres and village halls which facilitate cultural activity. We consider this to reflect the NPPF (2018).	n/a	No	
West Mercia Police	LPPS569	Paragraph 20.2	Yes	Yes	Yes		We welcome and support the recognition of the emergency services as part of the facilities needed to support sustainable communities and development. This is supported by numerous appeal decisions by the Secretary of State and Planning Inspectorate.	Not applicable.	No	Whilst we do not consider it necessary to participate at the oral part of the examination, we would be happy to do so if the Inspector considered this to be beneficial to proceedings.
Campaign to Protect Rural England	LPPS368	Paragraph 20.2	No	No	Yes	Justified Effective	The plan defines Community Facilities both here and in the Glossary. The definition here gives more detail than the Glossary. There is probably no actual inconsistency, but they should be cross-referenced	Make a cross-reference between 20.2 and Glossary. Ideally the definition should be part of Policy 20A, rather than mere commentary.	No	This is essentially a minor drafting issue, which we hope can be accepted as a minor amendment, without needing debate
Sport England	LPPS264	20.12		Yes			Sport England supports policy 20B and the associated justification in paragraph 20.12 which accords with paragraph 97 of the NPPF and Sport England's policy guidance regarding development affecting existing sport and recreation facilities including playing fields.		No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 21: EMPLOYMENT LAND

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Homes England	LPPS108	Policy 21A	Yes	Yes	Yes		Homes England recognises that WFDC needs to safeguard land for economic development over the plan period. It is however important that the Council regularly reviews its employment land availability and take up to ensure that the sites that are available are attractive to the market and that there is take up of these sites, avoiding sites being left vacant for too long a period of time. Regular review of employment sites and take up will enable the Council to react to any changes in circumstances throughout the plan period. Where sites have not been taken up and there is no demand for more traditional employment uses (B1, B2, B8), the Council could give consideration as to whether there is demand for other employment generating uses prior to the site being considered for residential or other land uses.		Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Barberry Hurcott Limited	LPPS924	Employment Land	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	It is noted that the council appears to be re-allocating a number of longstanding existing employment sites. Have these sites been robustly reviewed? We note that paragraph 7.75 notes that the net outflow of workers out of the District is 37,685 but at table 3.2 of the same report it notes that the net outflow is -8980. Can the Council please confirm how the figure at 7.75 has been calculated? There is an urgent need to rebalance the job density ration of the district (0.64) which is lower than the West Midlands (0.79).	The council must take a more proactive approach to employment growth in the District to readdress this imbalance.	Yes	Due to the complexities of the issues of concern to the promoter, and the nature and the extent of public involvement in this site, it is considered that further verbal clarification and discussion at the EiP Hearings will be essential, and will further assist the inspector.

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 22: TOWN CENTRE DEVELOPMENT AND RETAIL

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Brudenell-Pryke Penelope	LPPS83	22A	Yes	No	Yes	Effective	Kidderminster Town Centre: The current plans do not go far enough to regenerate the town centre. Residential: I would support the continued expansion of conversion of upper floors of existing retail properties into residential dwellings, whilst retaining retail properties on lower floors. In addition I would support conversion of ex-retail properties into residential properties in areas of the town that are now almost devoid of retail stores. Office: Office space with parking in the town centre would encourage businesses who want a central location to relocate. The employees would bring more retail/café business during the working day. This has been shown to rejuvenate town centres. Retail: Some of the long term empty shop floor space in the town centre (e.g. old Woolworth's site) could be made into permanent sites for small local retail businesses, creating niche shopping areas. Such businesses that might be suitable would be specialist retail suppliers such as home-made/craft, comic book stores, music and books, steampunk and vintage clothing, etc. This has worked well in other towns and cities. Some of the retail stores from other areas (the Horsefair for example,) might be encouraged to move to the town centre, also relieving some of the traffic congestion in that area of town. We also have fashion designers being trained in Kidderminster via B-Met; they could be offered a permanent outlet for their senior students work. Community: Re-introduce raised flower beds with seating around the town centre to present the town as a more pleasant place to visit and live. This would also encourage the new town centre residents to take pride in their surroundings. The current town centre looks rather bleak and shabby, despite the money spent on the uneven paving and shin-stabbing record stack "features". The walking route from the train station to the town centre should be a pleasant one to encourage visitors to return again. I've heard too often "I went to Kidderminster once; I wouldn't go back again!"	Please see comments in previous sections.	No	
Bareford David	LPPS131	22A	Yes	No	No	Justified	I agree we need to focus on planning the initial houses on brownfield sites, but, for the imminent viability of Kidderminster as a town centre, we need now to attract young couples into affordable and also upwardly mobile housing within the very centre to boost trade and encourage eateries etc as seen when one now walks down Broad Street in Birmingham.		No.	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 22: TOWN CENTRE DEVELOPMENT AND RETAIL

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
McDonalds Restaurants Ltd	LPPS954	Policy 22G Hot Food Takeaways		No		Consistent with National Policy	Planware Ltd on behalf of McDonald's Restaurants Ltd Planware Ltd consider that there is no sound justification for Policy 22G point 2 which imposes a ban on restaurant that includes a element of A5 use within 400 meters of the boundary of a school. Planware Ltd do not believe a cogent evidence base has been assembled to justify this point. It is also considered that Policy 22G point 2 is not consistent with national policy. Restricting the location of A5 proposals through a 400m exclusion zone around a boundary of a school is not a positive approach to planning. This is contrary to paragraph 11 of the NPPF that advises authorities to positively seek opportunities to meet development needs of their area. Policy discriminates to A5 use and does not discuss A1 and A3 use which can sell foods high in fat and sugar.	To remove bullet point 2 of policy 22G.		
Kentucky Fried Chicken (Great Britain) Limited	LPPS197	Policy 22G	Yes	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	We consider that inclusion of Policy 22G bullet points 2 and 4 render the draft Plan unsound because the they fail to meet the tests for policies as follows: POSITIVELY PREPARED The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a school as zero, but does so without evidence of either a link between the incidence of obesity and the proximity of hot food takeaways to such places or any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed. In fact, the distance chosen could have the effect of banning hot food takeaways from a majority of the District. No assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, so it is not possible to balance these impacts. The policy is negative in its assumptions, using the concept of 'unhealthy food', which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. We are further of the view that food of high energy density or poor nutritional value is sold from and at a range of premises within a variety of other classes, including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, and that focussing on Class A5 uses or elements thereof is both unhelpful and unfair. JUSTIFIED There is no evidence for a causal link between the incidence of obesity and proximity of hot food takeaways to school and only limited	Delete Policy 22G bullet points 2 and 4.	Yes	Because it may be necessary to discuss the evidence base for the policy and any additional evidence the LPA presents.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							evidence of any correlation at all, so it is unclear how refusing planning permission for hot food takeaways within 400 metres of such locations could ever be justified. The inclusion of primary schools is particularly problematic, as it is clear that pupils there are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility their parents or guardians. This is the view taken by Inspectors at appeal (e.g. APP/P4415/A/11/2159082 and APP/W4515/W/16/3154960) for some considerable time. Consequently, it is far from clear how refusing planning permission for hot food takeaways within 400 metres of primary schools could ever be justified. It is better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of designated centres, there is scope to widen their application to support the retail health of retail provision outside centres, such as standalone or parade units. As it is usually impractical to apply a maximum frontage proportion outside centres, the 400-metre walk distance might be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold as set for centres. In adopting such an approach, it would be preferable to consider optimal proportions of all retail uses that could contribute to healthy centres or a healthy offer generally, whether in- or out-of-centre, instead of focussing on particular uses considered to be a problem, apparently for wider social reasons unrelated to retail planning. On a practical point, there is a significant difficulty in using distance radii in that it takes no account of real barriers, physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. It is far better to use real walk isochrones. Finally, whilst Health Impact Assessment is a good idea in principle, in practice it can be a very subjective exercise. We find formats vary considerably from area to area, but a nationally-agreed format may offer a way forward. Our client would be pleased to engage further on this or any healthy catering scheme you may wish to develop. EFFECTIVE For the reasons set out, it is unclear how refusing permission for hot food takeaways within 400 metres of primary schools could ever be effective. Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods, however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not.			

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							The area that would be affected by the policy covers a large part of the City, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against objectives result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal? Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key determinant and must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more effective strategy for reducing childhood obesity. CONSISTENT WITH NATIONAL POLICY We consider that no regard has been had to national policy and advice in preparing Policy 22G bullets 2 and 4 because no NPPF policies include dietary issues. The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are within walkable distances of local facilities and public transport to other facilities. Whilst PPG part 53 paragraph 6 now suggests that regard could be had to proximity to schools, community centres and playgrounds, it omits of what. Similarly, it refers only to over-concentration and clustering of "certain use classes" and high levels of obesity "in specific locations". It leaves plan-makers to evidence any such policy.			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 23: SUSTAINABLE TOURISM

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
West Midland Safari Park	LPPS921	23 A	Yes	Yes	Yes		The economic impact study submitted with the planning application for the Hotel, Conference Centre and Water Park (referenced in paragraph 13.26) has demonstrated the special contribution to the local economy made by WMSP. It is important that appropriate policies are provided that create a positive framework for facilities at WMSP to be upgraded and improved in order to sustain visitor numbers and boost the economic prosperity of the park and local area as a whole, and WMSP considers that Policy 23 A achieves these objectives, and supports the Policy. WMSP particularly welcomes reference in the Policy itself and in the supporting text to the Masterplan approved by Wyre Forest District Council in 2013. Whilst paragraph 23.13 rightly observes the focus of the Masterplan was the future development of the Hotel, Conference Centre and Waterpark. The Masterplan will continue to provide a framework for considering future development of the site, to ensure that development takes account of the potential wider impact it may have. Given the projected lifespan of the Local Plan, it is important that the Policy is sufficiently flexible to enable the evolving plans and aspirations of the owners of WMSP to be reflected in an updated or amended Masterplan, and the reference in the Policy to "any other similar agreed document" appears to give this flexibility. On this basis, and with the particular characteristics of WMSP considered, this general tourism policy for Wyre Forest District as a whole making specific mention of the WMSP as one of the most important tourist attractions within the region, is welcomed.	None proposed.	No.	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Richborough Estates	LPPS824	Policy 24A-Telecommunications and Broadband				Justified	Policy 24A to be modified to be clear that it is not a requirement of new development to provide 5G technology, rather it should encourage it where possible.	Policy 24A to be modified to be clear that it is not a requirement of new development to provide 5G technology, rather it should encourage it where possible.	Yes	We would welcome the opportunity to attend the examination hearing sessions to discuss the issues we have identified which affect the soundness of the plan, and to meet with the Council to discuss the evidence base when it is further evolved.
Homes England	LPPS109	Policy 24B	Yes	Yes	Yes		Homes England supports the broad principles of this policy that seek to reduce carbon emissions. The bullet point that seeks at least 10% of energy requirements from new development to be from renewable or low carbon sources should in addition to the issue of viability recognise that this may not be practical or physically appropriate on all sites. The policy could therefore make reference to viability and feasibility in accordance with the NPPF.	The bullet point that seeks at least 10% of energy requirements from new development to be from renewable or low carbon sources should in addition to the issue of viability recognise that this may not be practical or physically appropriate on all sites. The policy could therefore make reference to viability and feasibility in accordance with the NPPF.	Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Campaign to Protect Rural England	LPPS367	Policy 24B	No	No	Yes	Justified Consistent with National Policy	For Stand Alone renewable and other low carbon schemes, an assessment of their landscape impact should be explicitly required and applications should be refused where the impact is excessive. They should only be allowed on agricultural land if of the poorest quality. Elsewhere in Worcestershire, we have found it necessary to oppose such schemes. The sites proposed are frequently good agricultural land, which ought to be retained in production	Add: Such development will not be permitted where it has an adverse effect on the landscape or takes agricultural land (better than grade 4) out of production.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Richborough Estates	LPPS825	Policy 24B-Renewable and Low Carbon Energy				Justified Consistent with National Policy	For the policy to be consistent with national policy and justified the requirements of new development over one dwelling should incorporate renewable energy technology to generate at least 10% of the development's energy need and to include electric vehicle charging points should be removed.	For the policy to be consistent with national policy and justified the requirements of new development over one dwelling should incorporate renewable energy technology to generate at least 10% of the development's energy need and to include electric vehicle charging points should be removed.	Yes	We would welcome the opportunity to attend the examination hearing sessions to discuss the issues we have identified which affect the soundness of the plan, and to meet with the Council to discuss the evidence base when it is further evolved.
Taylor Wimpey West	LPPS1008	Policy 24B		No		Justified	Comberton Road Kidderminster Whilst it is commendable to deliver renewable and	The requirement for the vehicle charging points at every property is unjustified and should be deleted	Yes	Taylor Wimpey considers it necessary to participate in the oral part of the

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Midlands							low carbon energy as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF 2018. In addition, the policy states that all new developments should include electric vehicle charging points. This requirement is not considered to be fully justified by the Council and it is questioned whether the network capacity exists for such provision. Again, in respect of the viability assessment, it is not clear that the cost of providing every property with a charging point has been considered alongside other policy requirements to determine whether the requirement would have an adverse impact on housing delivery. It is therefore recommended that this requirement is unjustified and should be deleted.			examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	LPPS1047	Policy 24B		No		Justified	Land at Bewdley Road North Stourport Whilst it is commendable to deliver renewable and low carbon energy as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF 2018. In addition, the policy states that all new developments should include electric vehicle charging points. This requirement is not considered to be fully justified by the Council and it is questioned whether the network capacity exists for such provision. Again, in respect of the viability assessment, it is not clear that the cost of providing every property with a charging point has been considered alongside other policy requirements to determine whether the requirement would have an adverse impact on housing delivery. It is therefore recommended that this requirement is unjustified and should be deleted.	The requirement for the vehicle charging points at every property is unjustified and should be deleted	Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Brudenell-Pryke	LPPS85	24B	Yes	No	Yes	Positively Prepared	Renewables:	Please see comments in previous sections.	No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Penelope						Effective	The minimum requirements for sustainable development will probably not be good enough in 20 years' time, so we should be thinking about the next step. The recent lessons learned by Wyre Forest House and the Wyre Forest Leisure centre should have taught us this. Plans should be made now to build energy efficient and renewable solutions into ALL new builds, whether for business or residential use. These should include in-built solar panels, battery storage and waste water heat recovery wherever possible, as well as grey water harvesting and re-use. In addition, more "joined-up" thinking is required for large developments. If properties need heat, is there a local district heating network or a business that is generating heat and not re-using it? If a new business development is planned, will it generate waste heat, and if so where will it be used? If not on-sit, is there, or could there be a district heating network? Many existing private properties in the Wyre Forest area are ex-council owned single brick houses, which are naturally prone to cold and damp. These properties are not eligible for grants for wall insulation. Whilst funding this locally may not be possible, pressure should be put on central government to introduce grants for this to England; they are already available in Scotland. We have an ageing population: We need to ensure that residential properties are suitable for our ageing population. Homes need to be well insulated, so that they are cheap and easy to keep warm, as well as keeping cool in the hotter summers which are to come. In addition the residents need to feel safe in their communities with good access to public transport. Effective street lighting is essential and choosing the cheapest LED lighting is not always the best long term option. For example PLEP lighting has been shown to be more energy efficient than most LED lights and has a more controllable light spread, resulting in the need for fewer light fittings. This also has the effect of lower maintenance costs.			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Bareford David	LPPS132	24B	Yes	No	No	Positively Prepared	I note the desire to reduce the installation of wind turbines in the Wyre Forest. No mention is made of the use of water turbines with the natural asset of the River Severn and Stour passing through the area.		Yes	
Persimmon Homes Limited	LPPS799	Policy 24B	Yes	No	Yes	Justified Effective	Policy 24B states that "all new developments should include electric vehicle charging points". Whilst the promotion of electric vehicle charging points is positive in principle there are issues with the provision of charging points that need to be carefully considered and supported with appropriate evidence. The Council should demonstrate that it has discussed this approach with energy suppliers to determine whether there would be a detrimental impact on the network if all new developments included re-charge facilities. There could be constraints on necessary increases in electric loading in an area because of the limited size and capacity of existing infrastructure. New substations could be required to accommodate the additional capacity which would have both urban design and viability implications for development. In addition, the inclusion of electric charging points in areas of communal parking (for apartments or shared parking courtyards for example) can be problematic as parking spaces are not always allocated to a particular dwelling and arrangements to ascertain who pays for the electricity used can be difficult. It is not clear at this stage whether the matter has been properly considered, and evidenced, by the Council.	The wording of Policy 24B should be amended to state that the installation of electric charging points in new development will be encouraged.	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity to discuss these as part of the Examination.
Home Builders Federation (HBF)	LPPS917	Policy 24B		No	No	Positively Prepared Justified Effective Consistent with National Policy	Recommend to delete requirement of electric vehicle charging point installations. This should be undertaken nationally in a standardised way after a proposed consultation to be undertaken by the DoT. Recommend to delete requirement to incorporate 10% renewable energy in all new developments. Any local requirements for the sustainability of buildings should reflect the government policy for national standards.	Recommend to delete requirement of electric vehicle charging point installations. Recommend to delete requirement to incorporate 10% renewable energy in all new developments.	Yes	
Taylor Wimpey West Midlands	LPPS1031	Policy 24B		No		Justified	Land at Rectory Lane Stourport Whilst it is commendable to deliver renewable and low carbon energy as part of a proposal, it is important that local planning policies do not	The requirement for the vehicle charging points at every property is unjustified and should be deleted	Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF 2018. In addition, the policy states that all new developments should include electric vehicle charging points. This requirement is not considered to be fully justified by the Council and it is questioned whether the network capacity exists for such provision. Again, in respect of the viability assessment, it is not clear that the cost of providing every property with a charging point has been considered alongside other policy requirements to determine whether the requirement would have an adverse impact on housing delivery. It is therefore recommended that this requirement is unjustified and should be deleted.			amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Parsonage Louise	LPPS160	24.1	Yes	Yes	Yes		I welcome the emphasis on low carbon technology and feel that it is essential that homes have the best possible insulation to reduce energy costs as much as possible, to reduce fuel poverty.		No	
Parsonage Louise	LPPS159	24.1	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	Solar panels are an effective way of cutting energy costs (especially important for low income households). They are also good for the environment.		No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 25: GREEN BELT

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Parsonage Louise	LPPS157	Policy 25 b	No	No	Yes	Justified Consistent with National Policy	The building of 1400 homes in Cookley is excessive and disproportionate to the needs of the community. Whilst some housing would be beneficial, the scale is unreasonable and would negatively impact the surrounding countryside.		No	
Bareford David	LPPS133	25	Yes	No	No	Positively Prepared Justified Consistent with National Policy	The Lea Castle site seems to be totally unsuitable for the housing needs of Wyre Forest and occupies prime green belt. The large majority of houses will be bought by people who will commute to Birmingham along an already congested route with poor access onto this in the first place. The Lea Castle West site and to a lesser extent Lea Castle North will join Kidderminster to Cookley no matter how deep the tree screening will be.		Yes	
Brooks Karen	LPPS165	25	Yes	Yes	Yes		No comments submitted.		No	
Sport England	LPPS271	Policy 25	Yes	No	Yes	Consistent with National Policy	Sport England generally supports Policy 25 which recognizes that outdoor sport and recreation are recognized as not being inappropriate development in the Green belt in accordance with paragraph 145 of the NPPF. However, the wording of the policy is not consistent with the recent amendment to the NPPF paragraph 145b) which has clarified that this includes being in connection with the existing use of land or a change of use.	Amend the wording of Policy 25 part ii) to read Provision of appropriate facilities (both for existing use of land or a change of use) for outdoor sport, outdoor recreation… to ensure that the wording of the policy is consistent with paragraph 145b) of the NPPF.	No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 26: SAFEGUARDING THE HISTORIC ENVIRONMENT

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Gladman Developments Ltd	LPPS885	Policy 26	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The above policy states that "*any development proposal causing harm or loss of significance to a heritage asset will be resisted unless clear and convincing justification is provided…*" Gladman reiterate the comments made in response to Policy 11B. The policy fails to have regard to the separate balancing exercises as required by national policy and is not considered to be positively prepared.		Yes	To discuss the issues raised in our written submissions.
Historic England	LPPS224	Policy 26	No	No		Positively Prepared Justified Effective Consistent with National Policy	We continue to object to the inclusion of a policy which indicates support for 'enabling development' in respect of the historic environment. A policy indicating support for heritage at risk, or the conservation or enhancement of heritage assets is a different matter but support for 'enabling development' could be misinterpreted.	It is recommended the wording related to 'enabling development' is removed from the Plan. Any such schemes could be dealt with sufficiently and appropriately under proposed historic environment policies and the proposed viability policies within the Plan.	No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 27: QUALITY DESIGN AND DISTINCTIVENESS

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Campaign to Protect Rural England	LPPS371	Policy 27C	Yes	No	Yes	Justified Effective	The policy does not (but should) provide for the retention of existing hedges wherever possible		Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
West Mercia Police	LPPS564	Policy 27C (v)	Yes	Yes	Yes		West Mercia Police welcome and support the recognition that planting can help to prevent crime and vandalism. This compliments part (XIII) of Policy 27A. Together they will ensure the achievement of the objective of creating safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; as set out in paragraph 91 of the NPPF (2018).	Not applicable.	No	Whilst we do not consider it necessary to participate at the oral part of the examination, we would be happy to do so if the Inspector considered this to be beneficial to proceedings.
Home Builders Federation (HBF)	LPPS912	Policy 27A		No	No	Positively Prepared Justified Effective Consistent with National Policy	Reference to SPD in policy is not in compliance with the regulations. The Council is referred to the recent High Court Judgement between William Davis Ltd, Bloor Homes Ltd, Jelson Homes Ltd, Davidson Homes Ltd & Barwood Homes Ltd and Charnwood Borough Council Neutral Citation Number : [2017] EWHC 3006 (Admin) Case No. CO/2920/2017.	It is recommended that these references are deleted	Yes	
Homes England	LPPS110	Policy 27A	Yes	Yes	Yes		Homes England supports the broad principles of this policy that seek to achieve high quality design and looks forward to the opportunity to comment on the Council's revised design guidance Supplementary Planning Guidance when it is published for consultation.		Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.
Persimmon Homes Limited	LPPS798	Policy 27A	Yes	No	Yes	Justified Effective	Policy 27A – Quality Design and Local Distinctiveness significantly builds on Policy 11A and there appears to be a degree of repetition between the two. As with our representation to Policy 11A, the general aim of Policy 27A, to ensure that design is of a good quality, in accordance with the NPPF is supported. However, Policy 27A also seeks to go well beyond the requirement in the NPPF by requiring design to be of a 'high' quality rather than a 'good' quality. Policy 27A A also requires development to 'integrate effectively with its surroundings' and this could result in development on sites that are surrounded by poor quality development having to replicate what is currently there. The reference in the NPPF (para 127 (c)) to		Yes	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							development being 'sympathetic to local character' while not preventing or discouraging 'appropriate innovation or change' would more clearly allow for development to diverge from the local contest where appropriate. There is a degree of repetition between Part A of the Policy and Part B (ii) in relation to development complementing the character of the area. There are other references to 'high quality' within the Policy, including proposed materials and hard and soft landscaping. It is not clear whether Local Plan Viability Appraisals have taken account the requirement to push for a 'high' rather than a 'good' quality of design. Policy 27A, B, xi states that existing trees should be incorporated into development or replacements provided where a tree survey demonstrates retention is not possible. This should be extended to include proposals where a tree survey demonstrates that the trees proposed for removal are not worth of retention, or where suitable replacement planting can be provided within the site.			
West Mercia Police	LPPS567	Policy 27A (xiii)	Yes	Yes	Yes		West Mercia Police very much welcome and support the inclusion part (xiii) within Policy 27A. In addition, the proposed policy provision is consistent with those in existing development plan documents in Wyre Forest and is also fully supported of the decisions taken by Planning Inspectors looking at this elsewhere in Worcestershire and Herefordshire. The details of these are as follows: Policy 40 - '*High Quality Design and Safer Communities*' of the Borough of Redditch Local Plan No.4 (adopted January 2017) states: *vi. encourage community safety and 'design out' vulnerability to crime by incorporating the principles, concepts and physical security standards of the 'Secured by Design' award scheme; providing infrastructure for policing and emergency services; and considering the incorporation of fire safety measures.* Planning Inspector Michael J Hetherington wrote in paragraph 84 of his report (16 December 2016) that: *'Concern has been raised about the Plan's approach to crime reduction and safety, including the provision of appropriate infrastructure for policing and the emergency services. A statement of common ground has been agreed between the Council and the Police and Fire and Rescue services in respect of these matters. Changes suggested by the Council in this regard, including the inclusion of up-to-date crime statistics and a greater emphasis on emergency services infrastructure are necessary for reasons of effectiveness.'* Policy BDP19 - 'High Quality Design' of the Bromsgrove District Plan 2011-2030 (adopted January 2017) states:	Not applicable.	No	Whilst we do not consider it necessary to participate at the oral part of the examination, we would be happy to do so if the Inspector considered this to be beneficial to proceedings.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							o. Designing out crime and the fear of crime by incorporating measures and principles consistent with those recommended by 'Secured by Design'. The above policy was also considered and deemed acceptable by Planning Inspector Michael J Hetherington, though he did not write about it specifically in his final report dated 16 December 2016. Policy SWDP 21 - ' *Design* of the South Worcestershire Development Plan (adopted February 2016) states: xiv. *Creating a Safe and Secure Environment* *Opportunities for creating a safe and secure environment and providing surveillance should be included, principally through the layout and positioning of buildings, spaces and uses. Where appropriate, development should incorporate measures for crime reduction that are consistent with those recommended by the Secured by Design guides. Buildings and their surrounding spaces should incorporate fire safety measures and be designed to allow rapid access by emergency service vehicles.'* Planning Inspector Roger Clews wrote in paragraph 148 of his report (04 February 2016) that: *'Policy SWDP 21 is a wide ranging policy dealing with design quality. The changes introduced by MM15/21A are necessary for compliance with national policy on energy and water efficiency standards and to ensure that all the policy's requirements are proportionate and unambiguous. In the light of consultation, the changes were adjusted to eliminate duplication of other planning requirements and to include an accurate reference to Secured by Design.'* Policy SD1 - '*Sustainable design and energy efficiency*' of the Herefordshire Local Plan - Core Strategy (adopted 16 October 2015) states: *'Development proposals should create safe, sustainable, well integrated environments for all members of the community. In conjunction with this, all development proposals should incorporate the following requirements...* *Create safe and accessible environments, and that minimise opportunities for crime and antisocial behaviour by incorporating Secured by Design.* Planning Inspector Christine Thorby wrote the following in paragraph 82 of her report (29 September 2015): *' SD1 relates to sustainable design and energy efficiency setting out a range of general principles that developments are required to consider. MM058 removes unnecessarily prescriptive measures and simplifies text to ensure the policy is consistent with the provisions of the NPPF. The modification also alters explanatory paragraph to reflect the changes and is necessary to make the policy sound.'*			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 27: QUALITY DESIGN AND DISTINCTIVENESS

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Pulford Grahame	LPPS871	Policy 27a		No		Justified Effective	Policy 27A Quality design and local distinctiveness vii, viii Access to the A4117 for the proposed dwellings adjacent to Tolland bungalow and Orchard house would have to be made via Plough lane or the entrance currently used to service Orchard House. This short section of road already contains several busy junctions including: The Plough Inn serving more than 1200 meals per week The bus stops allowing outside the Plough Inn, when travelling towards Cleobury Mortimer causing traffic to overtake adjacent to Plough Lane. Similarly, towards Bewdley it stops at the junction with New Road and the Village hall. Far Forest Stores, although a car park is provided for customer use it cannot accommodate HGVs and tractors resulting in them parking on pavements and verges. Far Forest Methodist Chapel has parking for 2 cars with other congregation members parking on road and pavement. New Road Visibility out of Plough lane is often restricted, accidents and near misses are common. Plough lane is a foot path, an increase in traffic would put walkers at risk	The settlement boundary review has failed to take into account Addendum (2) to Preliminary Ecological Appraisal of potentially ecologically sensitive sites on the WFDC lst of sites for the allocation in the 2018 plan. English Nature have also previously expressed written concern regarding the site and proposals. The only sound out come is to remove BR/RO/4/6 from the settlement boundary and not develop Orchard House in preference for other brown field sites within WFDC. Locally the village has extended with caravan sites that are now full 12 month sites as per concerns raised by Rock and District Council see minutes November 2018. The pub, school and shop are thriving with no extra amenity required.	No	
West Mercia Police	LPPS566	Paragraph 27.21	Yes	Yes	Yes		West Mercia Police welcome and support the recognition that planting can help to prevent crime and vandalism. This compliments part (XIII) of Policy 27A. Together they will ensure the achievement of the objective of creating safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; as set out in paragraph 91 of the NPPF (2018).	Not applicable.	No	Whilst we do not consider it necessary to participate at the oral part of the examination, we would be happy to do so if the Inspector considered this to be beneficial to proceedings.
Campaign to Protect Rural England	LPPS369	Paragraph 27.39	Yes	No		Justified	These paragraphs of supporting text inadequately reflect the role of the river Stour in providing power for medieval fulling mills and early modern and 19th century iron production. The present text seems to focus only on its industrial role in Kidderminster. This applies to the Titan Steels works at Cookley. Wilden Works (now industrial estate) and two sites at Stourport, with some more rural sites.	Add at end of 27.39: Outside Kidderminster, the river powered medieval fulling mill and early modern and later iron forges and slitting mills.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
										Since this is amplification, we would hope this amendment could be accepted as a minor amendment without debate
Campaign to Protect Rural England	LPPS370	Paragraph 27.40	Yes	No		Justified	These paragraphs of supporting text inadequately reflect the role of the river Stour in providing power for medieval fulling mills and early modern and 19th century iron production. The present text seems to focus only on its industrial role in Kidderminster. This applies to the Titan Steels works at Cookley. Wilden Works (now industrial estate) and two sites at Stourport, with some more rural sites.		Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument. Since this is amplification, we would hope this amendment could be accepted as a minor amendment without debate

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 28: RURAL DEVELOPMENT

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Campaign to Protect Rural England	LPPS372	Policy 28A (F)	No	No	Yes	Justified Effective	We suspect the policy leaves a loophole, relating to agricultural buildings converted to residential use under permitted development rights. If so this loophole should be closed	Refer not only to conversions under this policy or predecessors by "by other means" or "under Permitted Development rights".	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Environment Agency	LPPS986	Policy 28B-Chalets, Caravans, and Mobile Homes		No			We support the policies set out for *Chalets, Caravans, Mobile Homes,* as well as conforming to flood risk management policies set out in the document and NPPF.			
Campaign to Protect Rural England	LPPS373	Policy 28B	No	No	Yes	Justified Effective	We support the principle of this policy. However there is scope for tightening it up. Many such chalets and mobile are in practice the occupiers' main home by virtue of them being allowed to occupy it for 11 months of the year, excluding a month during the winter, when they take a holiday in (say) southern Europe. Technically the 11 months' occupation appears not to be sufficient to offend against prohibition on "permanent". We would suggest that there should be an additional restriction (a new one) as to any person being in occupation continuously for more than 6 months. This would apply only to new cases.		Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Worcestershire Wildlife Trust	LPPS337	Policy 28C Equestrian Development	Yes	Yes	Yes		The WWT welcomes this policy and consider that that is both legally compliant and sound.		No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 29: SITE ALLOCATIONS INTRODUCTION

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Gould Singleton Architects Ltd	LPPS816	Paragraph 29.3, Call for Sites				Justified	There is a clear need to allocate a substantial amount of additional land for new housing. It is contended that the authority has not provided the flexibility to respond to unforeseen circumstances to deliver an adequate supply of housing.	To include site FHN/7, land south of Wolverley road which was in the call for site process, into the local plan.		
Watson David	LPPS676	Paragraph 29	Yes	Yes	Yes		I support the proposals as set out in the new Local Plan, as they seem the best compromise of land usage, satisfying housing needs whilst limiting damage to the Green Belt, the ecology and the public rights of way, The decision to exclude Spennells fields is a sound one as it would cause and excessive loss of Green Belt lane, rights of way that are enjoyed by hundreds of people, and a well-established ecosystem. The land surrounding Offmore does not enjoy these valuable natural resources. It would be preferable to ensure that all the brownfield sites are used before any Green Belt land is lost, with an on-going programme to add to the brownfield stock as it becomes available.		No	
Mills John	LPPS702	Paragraph 29	Yes	Yes	Yes		I support the present plan. I am writing to oppose any changes which would mean re-designation of Green Belt and development on the Green Belt adjacent to Spennells. It is only in exception circumstances that development on Green Belt should be considered. This area is far from being marginal land. It is agriculturally productive. It is also a wildlife haven. In particular it supported very large numbers of skylarks which are a species in great decline nationally. This area also has enormous amenity value with its many footpaths which are greatly used by walker and joggers. Obesity is a severe problem putting great strain on NHS resources so amenity areas which encourage activity must not be lost. The added infrastructure costs of developing this area would be large and fall on council tax payers. An exit onto the Worcester Road would be extremely problematic as this area already suffers greatly from congestion, particularly during rush-hour. In an area of fairly static population and limited local employment development here would only lead to increased commuting into Worcester or Birmingham. air pollution is such a great concern we should encourage people to live close to their employment and reduce commuter travel especially by car.		No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 29: SITE ALLOCATIONS INTRODUCTION

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Legg Russell	LPPS701	Section 29	Yes				I support the retention of the Green Belt on the Spennells Fields because: It protects our countryside from urban sprawl.		No	
Mills Margery	LPPS746	Section 29	Yes	Yes	Yes		I wish to comment on the original inclusion of the Green Belt to the east of Kidderminster in the original local plan for Wyre forest and to argue that the Spennells fields should remain Green Belt land because of its high environmental quality and amenity value to the local community. The former relates mainly to the loss of wild life habitat for many threatened species of birds, including sky larks and linnets. The retention of mature hedgerows and trees, such as oak and horse chestnut is another positive attribute. Moreover, the fields are crisscrossed by numerous footpaths and one bridleway. It provides space for a number of recreational activities such as horse riding, walking and cycling. Therefore, it is of great value to the health of the local community. Local residents make the most use of the fields, but it also attracts walkers from Aggborough and other more urbanised areas of Kidderminster. In protecting Green Belt land here, we would also protect adjacent hamlets and villages, such as Shenstone and Stone from being absorbed in urban sprawl. We understand that the population of Kidderminster is fairly static, so we would not require extra housing. Therefore, the only conclusion might be that commuters would be attracted to the area contributing to the already heavy traffic flow in rush hours on the Worcester-Wolverhampton road feeding into the very congested ring road bottleneck. Most commuting would be northwards to the West Midlands conurbation, so if extra housing is required proposed sites to the north of the town centre would be more appropriate.		No	
Environment Agency	LPPS971	Paragraph 29.7		No		Justified Effective Consistent with National Policy	Sites within Flood Zone 3 and 2: For site allocations which include areas of Flood Zones 2 and/or 3, we would seek clarification that your Council are satisfied there is sufficient land available within Flood Zone 1 to accommodate the proposed development (ie. number of houses or hectares (ha) of employment land). There is some uncertainty in relation to some sites. We would recommend that you cross reference/include		No	

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							specific FRA requirements and circumstances local to the site within the related site allocation policy text ie. "the design of the site will need to satisfactorily address flood risk..." We have not assessed/cross referenced all of the sites in your SFRA summary table with the site allocation document but provided some comments below to highlight the above and assist an improved policy document. There are several sites which are allocated brownfield sites with high risk Flood Zones, and some are partially protected by Flood Alleviation Schemes. Such developments should consider FRA overtopping and breach scenarios - flood proofing resilience and sequential approach, no ground floor accommodation.			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Rogers Timothy	LPPS166	Policy 30	Yes	Yes	Yes		In my opinion, the strategic site allocations set out within the Local Plan represent a viable and sustainable future for Kidderminster Town Centre and the rest of the Wyre Forest. The site allocations are located in sustainable locations with good access to public transport and walking/cycling facilities. In addition, minimal land has been removed from the Green Belt which will ensure that the planned growth within the region is contained largely within the existing footprint of the urban area, reducing the impact on the environment and promoting urban regeneration and economic growth on existing brownfield sites.		No	
Worcestershire Wildlife Trust	LPPS338	Policy 30-Kidderminster Town	Yes	Yes	Yes		The WWT consider that this policy is both legally compliant and sound.		No	
Stanmore Properties Ltd	LPPS832	Policy 30	Yes	No	Yes	Justified	The identification of Hurcott ADR south as Green Gap is unjustified and makes the Plan unsound. I act on behalf of Stanmore Properties Ltd who own land designated as BW/4 Hurcott ADR south. The site owned by my client was previously allocated as part of Core Housing Site BW/4 for 200 houses and is now proposed instead as Green Gap (Policy 30.12). The land in their ownership is shown on location plan 2639-100 Rev B. The northern part is in another ownership and now has planning permission for 91 houses. The southern part however, previously a Core Housing Site, has now been changed with no consultation with the owner to a Green Gap under Policy 30.12 but there is no evidence to justify this change. Policy 30.12 and the reasoned justification paragraphs 30.30 to 30.32 say the southern part of the ADR will be allocated as green gap and not released for development “in order to protect the Hurcott Pastures SSSI and the setting of the historic Hurcott Village.” The evidence base does not provide any justification to demonstrate any adverse impact of development to the SSSI or the setting of Hurcott village. There is no evidence to support why this approach is necessary. There are no other green gaps anywhere in the district and the policy has no basis. **Evidence Base** Location Plan 2639-100 Rev B shows Hurcott Pastures SSSI to be on the southern part of my client’s ownership and south of the proposed Green Gap. Hurcott village is at the junction of Hurcott Road and Hurcott Lane about 130m south of the proposed Green Gap. There is an extensive evidence base to the Pre-Submission Plan that includes:	• Deleting Policy 30.12 to remove the Green Gap designation • Tthe site reallocated for housing under Policy 30 Kidderminster Town - Table 30.0.1 Allocated Sites in Kidderminster - BW/4 Stourbridge Road ADR - BW/4 • Cconsequential amendments to Policy 7A Strategic Green Belt Review - Hurcott ADR	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							• Heritage Impact Assessment Oct 2018 • Preliminary Ecological Appraisal June 2018 • Sustainability Appraisal Appendix B (HELAA forms) • Worcestershire Sub-Regional Green Infrastructure Framework - Kidderminster East Strategic Development Corridor Concept Plan version 1.3 • Site Selection Paper Oct 2018 None of these present any compelling evidence to support the conclusion that development of this site would damage the Hurcott Pastures SSSI or the setting of Hurcott village, rather the reports refer to constraints and recommend stand-off zones to Hurcott Lane might be needed if housing takes place. • Heritage Impact Assessment – Appendix A3 includes an assessment of site BW/4 and makes reference to the southern part of the site as a sensitive landscape setting for Hurcott village, Mill and pool. It accepts mitigation by way of "Retention of dense tree screening to the north of Hurcott Mill and pool will be essential to retain the historic character of the village and setting." It does not say the site should remain undeveloped or open to justify Green Gap; Furthermore, the significance of the heritage assets identified as WSM51479 and WSM08170 is stated as negligible and medium/low respectively; • Preliminary Ecological Appraisal refers in the event the site is developed, to at least a 50m stand off from Hurcott Lane and the southern site boundary (ie north of the SSSI on the attached Location Plan) but does not say development should be restricted on the rest of the site for any ecological reason; • Sustainability Appraisal is neutral in its assessment; • Green Infrastructure Framework suggests standoffs to Hurcott Lane; • Site selection paper refers to 'potential' adverse hydrology on Hurcott Pastures SSSI which is dry pasture. The District Council have been unable to produce any evidence of adverse impact. The evidence base lends no support for a designation as Green Gap to protect SSSI or heritage assets. The designation is unsound and is not justified by the evidence. It should be removed and the site reallocated for housing.			
Worcestershire County Council, Planning Economy & Performance	LPPS988	Policy 30					Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource) or within 250m of a waste site or within 250m of mineral site. • BHS/16 Timber Yard, Park Lane.	To ensure that as the 'agent of change' (NPPF Para 182) the highlighted developments in the document will include suitable migration to ensure that the operation of the existing business will not		

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							• BHS/38 Kidderminster Fire Station. • BW/4 Stourbridge Road ADR. • FPH/5 Ambulance Station. • FPH/10 (housing) Silverwoods Phase 2. • FPH/23 (housing) Silverwoods Phase 1. • OC/11 Stourminster School site. • WFR/WC/18 Sion Hill School site. • WA/KF/3 Land at Low Habberley. • LI/10 Land r/o Zortech Avenue. • BHS/11 Green Street Depot. • BHS/17 Rock Works, Park Lane. • FPH/8 SDF and adjacent land. • FPH/10 (Employment) Silverwoods Phase 2. • FPH/23 (Employment) Silverwoods Phase 1. • FPH/24 Romwire. • FPH/27 Adj Easter Park, Worcester Road. • FPH/28 Land at Hoobrook. • LI/12 Former Burlish Golf Course Clubhouse. • MI/26 Ratio Park, Finepoint. • BW/4 (Green Gap) Stourbridge Road ADR.	have a significant adverse effect on the new developments. **BHS/16 -** Policy 30.6 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development. **BHS/38 -** Policy 30.7 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development. **BW/4 -** Paragraph 30.29 states that this site already has planning permission for 91 dwellings. Therefore no changes required. **FPH/5 -** This site is within 250m of an existing concrete batching plant. Policy 30.14 should include a requirement to ensure that as the 'agent of change' (NPPF paragraph 182) the development will include suitable mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development). **FPH/10 -** (housing) Policy 30.15 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste		

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								management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development. **FPH/23 -** (housing) This site is within 250m of an existing concrete batching plant. Policy 30.15 should include a requirement to ensure that as the 'agent of change' (NPPF paragraph 182) the development will include suitable mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development). **OC/11 -** Policy 30.19 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it. **WFR/WC/18 -** Policy 30.20 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it. **WA/KF/3 -** Policy 30.21 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it. **LI/10 -** Policy 30.22 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial		

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it. **BHS/11 -** Policy Policy 30.24 require the developer to demonstrate that as the agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development. **BHS/17-** Policy 30.24 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development. **FPH/8** - This site is within 250m of an existing concrete batching plant. Policy 30.25 should include a requirement to ensure that as the 'agent of change' (NPPF paragraph 182) the development will include suitable mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development). This site is also within 250m of a waste site. Policy 30.25 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse		

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								effect on the new development. **FPH/10 -** (Employment) This site is within 250m of an existing concrete batching plant. Policy 30.15 should include a requirement to ensure that as the 'agent of change' (NPPF paragraph 182) the development will include suitable mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development). This site is also within 250m of a waste site. Policy 30.15 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development. **FPH/23 -** (Employment) This site is within 250m of an existing concrete batching plant. Policy 30.15 should include a requirement to ensure that as the 'agent of change' (NPPF paragraph 182) the development will include suitable mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development). **FPH/24 -** Paragraph 30.2 states that planning permission are already in place for this allocation, therefore no amendments required. **FPH/27 -** Policy 30.26 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.		

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								FPH/28 - Policy 30.27 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing waste management site and will include any necessary mitigation to ensure that the operation of the existing business will not have a significant adverse effect on the new development. **LI/12 -** Policy 30.29 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it. **MI/26 -** Paragraph 30.2 states that planning permission are already in place for this allocation,therefore no amendments required. **BW/4 -** (Green Gap) We note that policy 30.12 is intended to prevent built development in this "green gap" and therefore no change to this policy is required.		
Associated British Foods Plc	LPPS797	Policy 30 Kidderminster Town		No		Positively Prepared Justified Effective Consistent with National Policy	The submitted version of a plan should re-instate Option B to the Preferred Options- i.e. release site FPH/1 from the Green Belt and allocate 4 hectares in this area of 100 houses.	The submitted version of a plan should re-instate Option B to the Preferred Options- i.e. release site FPH/1 from the Green Belt and allocate 4 hectares in this area of 100 houses.	Yes	The site was previously proposed to be allocated in the Preferred Options. The site has been de-allocated on ground of potential impact on the adjoining SSI. We consider these grounds are not valid and have presented evidence to that effect. We would like the inspector, when appointed. to have the opportunity to consider this evidence and ask

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
										questions to JLL.
Gladman Developments Ltd	LPPS895	Policy 30	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Gladman are promoting land at Wolverhampton Road, Kidderminster for residential-led development. A location plan and vision document are provided in Appendix 6. The parcels offer an opportunity to release land from the Green Belt to ensure the delivery of sustainable and distinctive development in an attractive market location. The site is a sensible location for development and the Council's own assessment confirmed that the parcel to the east could be release for development without undue harm to the purpose of the Green Belt. We consider this conclusion can be extended to the parcel to the west too. The site was previously considered by the Council as one of the Options for development at Kidderminster, following the conclusions of the Council's Stage II Site Analysis (April 2017) report. Gladman have commissioned further studies to consider an assessment of the sites which are identified within the Council's Part II assessment for potential residential development and the proposed development site (provided in Appendix 2). The study demonstrates that not only should the western parcel be included in the consideration for development, but that it represents a more viable option for development than some of the other sites considered for future allocation. The site is relatively well contained with views being limited to the valley which is reinforced by tree belt planting to the Lea Castle Hospital site and in the west. If the Site were to be developed, the countryside gap between Cookley and Kidderminster would remain substantial at approximately 0.9km. This remaining gap would ensure an extensive tract of countryside is retained between Cookley and Kidderminster and would not impact upon the identity of Cookley as a rural standalone settlement. Development of the Site would not create inter-visibility between the settlements. Furthermore, there is an opportunity with development to link existing woodland belts across the northern edge of Kidderminster creating a robust new edge and gateway, with green infrastructure implemented as per the	Land at Wolverhampton Road should be allocated for up to 400 dwellings	Yes	To discuss the issues raised in our written submissions.

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							recommendations of the Green Belt Review documents. The officer's comment given in the recently published Special Overview and Scrutiny Committee Appendix 2 – Consultation Responses for the Preferred Options Consultation Document (Oct 2018) for HELAA parcel WFR/WC/16 (the site promoted by Gladman Developments Ltd) concluded: - "*This is a very open, rural landscape currently distinct from the northern suburban fringe of Kidderminster. Development of any part of this site will result in a substantial impact to the landscape character.*" However, as considered in Appendix 3, following a detailed site assessment, FPCR have concluded that development of the site would form a logical urban extension, infilling the gap between the permitted residential sites to the west and east and presenting an opportunity with development to create and deliver a new robust green infrastructure and Green Belt boundary to the north-eastern edge of Kidderminster and a new attractive gateway to the town from this direction. Whilst this would substantially alter the landscape of the site, as development of any site would, this would not "*result in a substantial impact to the landscape character".* The site is capable of delivering over 400 dwellings. Gladman consider that the site can be brought forward to deliver new homes within 5 years of its removal from the Green Belt through the local plan preparation process. It would therefore be able to make a significant contribution to the sustainable delivery of new housing to meet development needs. The proposed development also benefits from direct frontage onto a number of main roads, providing various vehicular access options. As part of the Lea Castle Hospital Re-development, there are committed highway improvements proposed at key junctions close to the site. Gladman commissioned WYG to provide additional transport and highways advice for the site which is included at Appendix 7. Their report concludes that the site offers opportunities to provide additional betterment at the assessed junctions. This includes: ▪ A signal controlled improvement at the Park Gate Road/Stourbridge Road priority junction.			

<table>
<tr><th>Respondent</th><th>Response No.</th><th>Part of Document</th><th>Legally Compliant?</th><th>Sound?</th><th>DTC?</th><th>Reasons for being unsound</th><th>Summary of Response</th><th>Suggested Modifications</th><th>Attend Oral Examination?</th><th>Reason for Attending</th></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>▪ An additional approach lane at the Park Gate Road/Wolverhampton Road junction.

These additional proposals would therefore result in an improvement of operation (e.g. shorter delays) when compared to a no development scenario.

There are also opportunities to deliver community uses such as sports pitches, children’s play areas and land for a doctor’s surgery on-site which would be a benefit to both new and existing residents.

Land at Wolverhampton Road offers an opportunity for Wyre Forest District Council to plan, and importantly – deliver, a new exemplary sustainable development at the edge of the District’s main settlement that embraces the character and distinctiveness of the surrounding area and enable the definition of a clear new Green Belt boundary using recognisable and permanent physical features.</td><td></td><td></td><td></td></tr>
<tr><td>Severn Trent Water Ltd</td><td>LPPS1053</td><td>Policy 30</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Positively Prepared</td><td>We would like to draw your attention to the High and Medium risk sites which we would be keen to discuss further to understand likelihood and growth trajectories.
<table>
<tr><td>BW/4</td><td>STOURBRIDGE ROAD ADR</td><td>Known hydraulic flooding risks downstream, combined risk to Hoobrook Terminal Pumping Station with Lea Castle Growth.</td><td>Medium Risk</td></tr>
<tr><td>WA/KF/3</td><td>LAND AT LOW HABBERLEY PHASE 1</td><td>Known hydraulic flooding risks downstream, combined risk to Hoobrook Terminal Pumping</td><td>Medium Risk</td></tr>
</table></td><td></td><td>No</td><td></td></tr>
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							Station with Lea Castle Growth.			
Place Partnership Ltd	LPPS209	.Policy 30	Yes	Yes	Yes		On behalf of our client, Worcestershire County Council (WCC), we welcome and support the proposed allocation of Naylor's Field for 35 Class C3 dwellings. We fully concur with the assessment of Wyre Forest District Council that there are no constraints to the development of the site to deliver this allocation, as detailed in its October 2018 Site Selection Paper. Whilst it is acknowledged that the hedgerows referred to in Policy 30.17 would need to be protected by any proposed scheme for the site, WCC consider that this can be achieved. It has therefore been demonstrated that the site is available, suitable and achievable in all respects in our view. It is however understood that objections were made to the allocation of the site during the Preferred Options public consultation phase on two grounds: 1. There is no evidence that the site is surplus to requirements; 2. 35 Class C3 dwellings would be out of character with the area. In response to the first ground, WCC can confirm that the site has been officially declared surplus to educational requirements and is available immediately for development. There are no impediments to this. This declaration by WCC underpins the statement made to this effect in paragraph 30.42 of the Local Plan. Turning to the second, far from being out of character with the area, a development of 35 Class C3 dwellings would be very much in-keeping with the existing residential area in which it would be situated. Indeed, it is very difficult to envisage an alternative development scheme that could be more compatible in this highly sustainable location in Kidderminster. It is clear from this that the site should contribute to meeting the District's housing needs during the forthcoming plan period. Without it, land to accommodate the resulting housing number shortfall would have to be found elsewhere. This would likely involve far less desirable sites in unsustainable locations in other parts of the District. The proposed allocation of Naylor's Field therefore clearly represents the effective use of land held in public ownership to deliver much needed new homes in the District, as envisaged and supported by Chapter 11 (paragraphs 117-123) of the National Planning Policy Framework (2018) (NPPF). This in turn helps support the delivery of the Government's	Not applicable.	No	Whilst we do not consider it necessary to participate at the oral part of the examination, we would be happy to do so if the Inspector considers this to be beneficial to proceedings.

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							objective of boosting the supply of homes (paragraph 59) and helps the Council to plan for a mix of housing in the District for different groups (paragraph 61).			
Hyde-Fynn Amy	LPPS715	Policy 30.21	Yes	No	Yes	Justified Effective	A further consideration is the overall visual effect on the area. Currently there is a view over the fields all the way to the hills; it is one of the reasons we purchased this property as it is not completely surrounded by houses, and has a more open aspect. Having 120 new homes built on the opposite side of the road will do away with this benefit, and leave us exactly where we did not want to be; in the middle of a housing estate. On a site that size, in order to get the number of houses listed, they would be unlikely to have the inside or outside space required. As many homeowners are older before they purchase, and renting is becoming a way of life for may, these will need to be family homes, and for 120 to be on that size site, I do not believe they will be suitable.	The land in question is not large enough to fit 120 new homes of a sufficient size for a family especially with adequate parking. There are already issues with parking on St Davids Close and St Michaels Place, and it is the closest place for any overspill from the proposed development to go.	Yes	It is difficult to get across al of the reasons, and the explanations, in a limited space.
Environment Agency	LPPS973	Policy 30.8, BHS/39 Boucher Building		No			Agree this site needs a further site specific FRA – whole site in Flood Zone 2 however is inundated in a 1 in 100 year plus 35%. If any residential dwellings are proposed we would expect them to be located above ground floor, and the FRA to detail possibility of overtopping, flood management and warning, contributions to defence maintenance and warning.			
Brudenell-Pryke Penelope	LPPS84	30.11	Yes	No	Yes	Positively Prepared Effective	**Sladen School Site:** The proposed direct link from this site to the area of the flats is a concern. The area in which the flats are based has a relatively high crime rate for the area, The Sladen site backs onto mostly privately owned properties which would be detrimentally affected if the criminals were enabled to easily access this area. The current of the privately owned properties are mostly young families or those approaching/at retirement; this would have an undesirable effect on this area. In addition the road access to Hurcott Road would need careful positioning so as to not damage the trees. The traffic flowing in/out of the new development would cause further traffic issues along Hurcott Road. The section of Hurcott Road between the site and Stourbridge Road is often congested due to the abundance of cars and vans parked on the road. Buses also use this Hurcott Road.	Please see comments in previous sections.	No	
Campaign to	LPPS374	Policy 30.12	No	No	Yes	Positively	The Green Gap forms part of an ADR. ADRs are "protected as		Yes	To amplify as necessary

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Protect Rural England						Prepared Justified Effective Consistent with National Policy	Green Belt" until they need to be released for development through a Local Plan Review. The designation as a Green Gap is tantamount to saying that the land never is to be developed. In these circumstances, the land ought to be designated as Green Belt. The north western boundary was (and partly still is) the parish boundary of Wolverley (now Cookley and Wolverley). It forms a narrow dry valley described in Saxon charter of AD 866 as dyke (or ditch). This will make a robust boundary for the Green Belt, which the hedge between it and Hurcott Pastures SSSI would not be.			this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Stanmore Properties Ltd	LPPS831	Policy 30.12	Yes	No	Yes	Justified	The identification of Hurcott ADR south as Green Gap is unjustified and makes the Plan unsound. I act on behalf of Stanmore Properties Ltd who own land designated as BW/4 Hurcott ADR south. The site owned by my client was previously allocated as part of Core Housing Site BW/4 for 200 houses and is now proposed instead as Green Gap (Policy 30.12). The land in their ownership is shown on location plan 2639-100 Rev B. The northern part is in another ownership and now has planning permission for 91 houses. The southern part however, previously a Core Housing Site, has now been changed with no consultation with the owner to a Green Gap under Policy 30.12 but there is no evidence to justify this change. Policy 30.12 and the reasoned justification paragraphs 30.30 to 30.32 say the southern part of the ADR will be allocated as green gap and not released for development “in order to protect the Hurcott Pastures SSSI and the setting of the historic Hurcott Village.” The evidence base does not provide any justification to demonstrate any adverse impact of development to the SSSI or the setting of Hurcott village. There is no evidence to support why this approach is necessary. There are no other green gaps anywhere in the district and the policy has no basis. **Evidence Base** Location Plan 2639-100 Rev B shows Hurcott Pastures SSSI to be on the southern part of my client’s ownership and south of the proposed Green Gap. Hurcott village is at the junction of Hurcott Road and Hurcott Lane about 130m south of the proposed Green Gap. There is an extensive evidence base to the Pre-Submission Plan that includes: • Heritage Impact Assessment Oct 2018 • Preliminary Ecological Appraisal June 2018 • Sustainability Appraisal Appendix B (HELAA forms) • Worcestershire Sub-Regional Green Infrastructure	- Deleting Policy 30.12 to remove the Green Gap designation - The site reallocated for housing under Policy 30 Kidderminster Town - Table 30.0.1 Allocated Sites in Kidderminster - BW/4 Stourbridge Road ADR - BW/4 - Consequential amendments to Policy 7A Strategic Green Belt Review - Hurcott ADR	No	

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							Framework - Kidderminster East Strategic Development Corridor Concept Plan version 1.3 • Site Selection Paper Oct 2018 None of these present any compelling evidence to support the conclusion that development of this site would damage the Hurcott Pastures SSSI or the setting of Hurcott village, rather the reports refer to constraints and recommend stand-off zones to Hurcott Lane might be needed if housing takes place. • Heritage Impact Assessment – Appendix A3 includes an assessment of site BW/4 and makes reference to the southern part of the site as a sensitive landscape setting for Hurcott village, Mill and pool. It accepts mitigation by way of "Retention of dense tree screening to the north of Hurcott Mill and pool will be essential to retain the historic character of the village and setting." It does not say the site should remain undeveloped or open to justify Green Gap; Furthermore, the significance of the heritage assets identified as WSM51479 and WSM08170 is stated as negligible and medium/low respectively; • Preliminary Ecological Appraisal refers in the event the site is developed, to at least a 50m stand off from Hurcott Lane and the southern site boundary (ie north of the SSSI on the attached Location Plan) but does not say development should be restricted on the rest of the site for any ecological reason; • Sustainability Appraisal is neutral in its assessment; • Green Infrastructure Framework suggests standoffs to Hurcott Lane; • Site selection paper refers to 'potential' adverse hydrology on Hurcott Pastures SSSI which is dry pasture. The District Council have been unable to produce any evidence of adverse impact. The evidence base lends no support for a designation as Green Gap to protect SSSI or heritage assets. The designation is unsound and is not justified by the evidence. It should be removed and the site reallocated for housing.			
Environment Agency	LPPS974	Policy 30.13, BT Building FHN/11		No			We note the site benefits from the Kidderminster Flood Alleviation scheme, any FRA must take into account climate changes impact and any breach scenarios/ contributions.			
Campaign to Protect Rural England	LPPS375	Policy 30.15	No	No	Yes	Justified Effective	The requirement to "incorporate the railway" suggests the intention is that the railway should be redeveloped as part of the site, which would clearly contradict other parts of the Plan. We do not understand that the phrase is trying to achieve and would suggest the phrase is void for uncertainty	A better verb or phrase to reflect WFDC's intentions in relation to the relationship of this site to the railway should be substituted.	Yes	We hope this can be dealt with as a minor modification.

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN

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Place Partnership Ltd	LPPS686	.Policy 30.17	Yes	Yes	Yes		On behalf of our client, Worcestershire County Council (WCC), we welcome and support the proposed allocation of Naylor's Field (see enclosed site plan) for 35 Class C3 dwellings. We fully concur with the assessment of Wyre Forest District Council that there are no constraints to the development of the site to deliver this allocation, as detailed in its October 2018 Site Selection Paper. Whilst it is acknowledged that the hedgerows referred to in Policy 30.17 would need to be protected by any proposed scheme for the site, WCC consider that this can be achieved. It has therefore been demonstrated that the site is available, suitable and achievable in all respects in our view. It is however understood that objections were made to the allocation of the site during the Preferred Options public consultation phase on two grounds: 1. There is no evidence that the site is surplus to requirements; 2. 35 Class C3 dwellings would be out of character with the area. In response to the first ground, WCC can confirm that the site has been officially declared surplus to educational requirements and is available immediately for development. There are no impediments to this. This declaration by WCC underpins the statement made to this effect in paragraph 30.42 of the Local Plan. Turning to the second, far from being out of character with the area, a development of 35 Class C3 dwellings would be very much in-keeping with the existing residential area in which it would be situated. Indeed, it is very difficult to envisage an alternative development scheme that could be more compatible in this highly sustainable location in Kidderminster. It is clear from this that the site should contribute to meeting the District's housing needs during the forthcoming plan period. Without it, land to accommodate the resulting housing number shortfall would have to be found elsewhere. This would likely involve far less desirable sites in unsustainable locations in other parts of the District. The proposed allocation of Naylor's Field therefore clearly represents the effective use of land held in public ownership to deliver much needed new homes in the District, as envisaged and supported by Chapter 11 (paragraphs 117-123) of the National Planning Policy Framework (2018) (NPPF). This in turn helps support the delivery of the Government's objective of boosting the supply of homes (paragraph 59) and helps the Council to plan for a mix of housing in the District for different groups (paragraph 61).	Not applicable.	No	Whilst we do not consider it necessary to participate at the oral part of the examination, we would be happy to do so if the Inspector considers this to be beneficial to proceedings.

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Campaign to Protect Rural England	LPPS376	Policy 30.17	No	No		Justified Effective	The requirement in condition 3 merely to "investigate" retention as Public Open Space is too weak and liable to be ignored by a developer. The policy should require the part mentioned to be retained (or dedicated) as Public Open Space. A developer could say he had investigated this and then decided to build on the whole site, leaving only the minimum quota of Public Open Space.	The policy should require the part mentioned to be retained (or dedicated) as Public Open Space. However the precise wording might provide some scope for flexibility	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument. However this is a minor drafting point.
Campaign to Protect Rural England	LPPS377	Policy 30.19	No	No		Justified Effective	Condition 3: Where buildings are located near Badgers' setts, it is necessary not only to protect the badgers from the people, but the people and buildings from the actions of badgers. Newspaper reports in Dudley have recorded the distress of residents whose houses and gardens have been adversely affected by badgers extending their set into the garden and under buildings.	Stronger wording is needed as to new barriers to separate people from badgers.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Campaign to Protect Rural England	LPPS378	Policy 30.22	No	No		Justified Effective	This is essentially a drafting point: some of the conditions for this development appear in Policy 30.22 and others in Policy 8G. It would be better for all the conditions to be in one place, probably 30.22	Policy 8G should merely allocate the site for one Travelling Showmen family. The rest of the content of that policy should be moved to Policy 30.22.	No	This is a minor drafting issue, which we would hope the Council will accept without debate
Environment Agency	LPPS980	Policy 30.23, Frank Stone Building, BHS/10		No			We would support the opportunity for River corridor enhancements here, as well as the addition of and flood risk reduction benefits. We support Policy 30.23 points 1-4.			
Environment Agency	LPPS977	Policy 30.24, Rock Works, BHS/17		No			We note that the majority of this site is within Flood Zone 3 and 2, related to conversion of the carpet factory building, but you are saying it is not suitable for residential conversion?	Is site suitable for residential conversion?		
Whitehouse Robert	LPPS679	Policy 30.24		No		Justified	I object to the employment allocation for the Rock Works. I wish to convert this building to residential flats, retain the façade and remove central core to allow for natural lighting of flats. Undercroft posting below.		No	
Campaign to Protect Rural England	LPPS381	Policy 30.29	No	No	Yes	Justified Effective Consistent with National Policy	We are troubled by this site. see CPRE 30.29 Zortech annex	Better used for a small number of bungalows.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Pre-submission Anonymous	LPPS951	Policy 30.29					I attended a public meeting on the 4th Dec where plans were being discussed regarding the former Wyre Forest Golf Course and the suggested proposals were discussed with council representatives. There has been land set aside which is in the hands of the			

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							countryside team but I am writing to strongly object to the land which has been identified in the local plan review as an area for potential development. We view this as a blatant disregard for local residents in an area which already suffers from congestion the Kingsway and Windermere Way are already used by many as a Bypass and if any of your council representatives have carried out a survey this would become very apparent I very much doubt this has been taken into consideration. The Schools are already full and congestion around the Burlish Primary school is a major issue and at times unsafe, getting an appointment at the local doctors is challenging enough but these proposals would make it impossible if houses were built in this area, Perhaps your focus as a council should be to keep this children safe whilst travelling to and from school rather than selling land off to make major profits. The plans for a Nature Reserve are good but this will also add to congestion with plans for a Cafe and Bike repair shop within the reserve. You also have driver speeding issues on the Kingsway which have never been addressed and as you have many children crossing here to access the sporting facilities and high school you have a duty of care to put some restrictions in place. The site of the old Burlish Park middle school is riddled with Asbestos and when it was in flames last year this posed a major threat to the residents nearby and don't see anything being done about this We strongly object to any Housing development being built on the old Wyre Forest Golf Course site and we look forward to your response.			
Wood Roger and Brenda	LPPS1061	Policy 30.21 - Land at Low Habberley					We would like to offer our comments re the housing development in Low Habberley. This would be a total waste of prime agricultural land and a breach of the council's responsibility to the people for the use of the Green Belt. There is NO logical reason to build on the prime agricultural land in Low Habberley except that it is cheaper to build there than in the run down / brown field sites nearer the centre of town. The nearer the centre of town you get the more the properties are run-down and dilapidated. Anybody with half			

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							an eye can see that the centre of town is withering away, what with charity shops, dilapidated workplaces, run-down council offices and empty workplaces waiting for the millennium to arrive. It will do no good to build on the outskirts of town and expect the wealth of the town to pick up. Give the people of the town reasonable quality housing within walking distance of their places to work.			
Natural England	LPPS647	Policy 30.21	Yes	Yes	Yes		Amendments proposed. Policy 30.21 Land at Low Habberley WA/KF/3 If there is scope to make a minor amendment to the plan, then we consider that the following change would improve policy 30.21. The allocation should set how biodiversity and environmental net gain will be achieved*, in line with the National Planning Policy Framework (paragraphs (118a, 170d, 174b) and delivering the aspirations of the Government's 25 year Environment Plan. Specifically, we recommend that the policy requires planning proposals to specify how the existing and surrounding habitats (which includes Habberley Valley Local Wildlife Site/Nature Reserve and Easthams Coppice) will be taken into consideration. Measures to protect and mitigate for bats and brown hare should also be considered.	Policy 30.21 Land at Low Habberley WA/KF/3 If there is scope to make a minor amendment to the plan, then we consider that the following change would improve policy 30.21. The allocation should set how biodiversity and environmental net gain will be achieved*, in line with the National Planning Policy Framework (paragraphs (118a, 170d, 174b) and delivering the aspirations of the Government's 25 year Environment Plan. Specifically, we recommend that the policy requires planning proposals to specify how the existing and surrounding habitats (which includes Habberley Valley Local Wildlife Site/Nature Reserve and Easthams Coppice) will be taken into consideration. Measures to protect and mitigate for bats and brown hare should also be considered.	No	
Field Mike	LPPS660	Policy 30.21	No	No	No	Consistent with National Policy	9. Protecting Green Belt land Paragraphs 79 to 92 79. The government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. 80. Green Belt serves five purposes: • to check the unrestricted sprawl of large built-up areas • to prevent neighbouring towns merging into one another • to assist in safeguarding the countryside from encroachment • to preserve the setting and special character of historic towns • to assist in urban regeneration, by encouraging the recycling of derelict and other urban land 81. Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to	There are plenty of brown field sites in the area plus large expanses of empty and very poor condition retail property in the town. This should all be used up in the first instance.	No	

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							provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land. 82. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should: • demonstrate why normal planning and development management policies would not be adequate • set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary • show what the consequences of the proposal would be for sustainable development • demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas • show how the Green Belt would meet the other objectives of the Framework 83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. 84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. 85. When defining boundaries, local planning authorities should: • ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development • not include land which it is unnecessary to keep permanently open • where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period			

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							• make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development • satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period • define boundaries clearly, using physical features that are readily recognisable and likely to be permanent 86. If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt. 87. As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. 88. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. 89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are: • buildings for agriculture and forestry • 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 • the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building • the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces • limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan • limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary			

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							buildings), which 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 90. Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are: • mineral extraction • engineering operations • local transport infrastructure which can demonstrate a requirement for a Green Belt location • the re-use of buildings provided that the buildings are of permanent and substantial construction • development brought forward under a Community Right to Build Order 91. When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources. 92. Community Forests offer valuable opportunities for improving the environment around towns, by upgrading the landscape and providing for recreation and wildlife. An approved Community Forest plan may be a material consideration in preparing development plans and in deciding planning applications. Any development proposals within Community Forests in the Green Belt should be subject to the normal policies controlling development in Green Belts. There are plenty of brown field sites in the area plus large expanses of empty and very poor condition retail property in the town. This should all be used up in the first instance.			
Day Stephen	LPPS670	Policy 30.21		No		Justified	This land is good agricultural land benefiting from an irrigation system and regularly used for salad/other crops. To propose taking this land for housing development will not only be detrimental to the Green Belt but reduce the ability for this country to produce food crops which may become essential in the light of the current political climate. This land is also the wrong side of Kidderminster to be near employment opportunities meaning that people living there would be commuting. This will cause added congestion to the existing surrounding road network, which already struggles to cope at peak periods. Especially when you consider the pending application for the proposed Crocky Trail	There are several brown field sites and derelict factories/offices/shops in and around the town centre that should be considered for housing development before taking any Green Belt land.	No	

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							development (application reference 18/0520/FULL) There is a lack of drainage infrastructure in this area to accommodate a further 120 dwellings. Flooding already occurs on several occasions in this area following heavy rainfall. In this case the development of this land at Low Habberley would not only be detrimental to food production and the Green Belt but would start to encroach onto the community of Low Habberley itself thereby losing its village identity. There are several brown field sites and derelict factories/offices/shops in and around the town centre that should be considered for housing development before taking any Green Belt land.			
Hyde-Fynn Amy	LPPS718	Policy 30.21	Yes	No	Yes	Justified Effective	It is our belief that the infrastructure in this area cannot support 120 new households due to a lack of school places, dentists, doctors and the budget to make the changes needed to find them. The three primary schools in the local area are already stretched and over-subscribed. The standards of education are barely being maintained with the large class sizes, although I believe that the Teachers are trying their best. Adding new students to these schools will lead to a rapid decrease in the education standard, as teachers will not be able to properly educate larger classes. There is an insufficient amount of NHS doctors and dentists in this area to serve the current population. For example, I am registered with a doctor's surgery on the other side of town, and my dentist is in Stourbridge. A family member cannot find an affordable NHS dentist. As the bus route serving Habberley has been cancelled, there is currently a lack of public transportation serving the area. The Franche/Malpool/Habblerley area cannot support more households. We have recently had approximately 100 new houses built on the site of any old church, and the infrastructure cannot cope with more. These houses need to be paced where there is a greater ability to cope with the amenities needed by the new residents.	The Franche/Malpool/Habblerley area cannot support more households. We have recently had approximately 100 new houses built on the site of any old church, and the infrastructure cannot cope with more. These houses need to be paced where there is a greater ability to cope with the amenities needed by the new residents.	Yes	It is difficult to get across all of the reasons, and the explanations, in a limited space.
Pre-submission Anonymous	LPPS930	Policy 30.21, Land at Low Habberley WA/KF/3					I am shocked at the proposal to build on a site of such natural beauty is sacrilege! We know houses are needed but the choice is unbelievable. I am sure a lot more thought could be applied to this proposal and look at areas that would benefit from upgrading and transformed into suitable residential use. I pray common sense will prevail. Not to mention the volume of extra traffic that constantly breaks the 40mph restriction.			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 30: KIDDERMINSTER TOWN

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Kidderminster Foreign Parish Council	LPPS206	Policy 30.21 Land at Low Habberley	No	No	No	Positively Prepared Justified Consistent with National Policy	Legally Compliant / Positively Prepared - we would challenge this on these grounds: a) Echoing comments made by councillors in other parts of the District, the Parish Council contend that the District Council have been negligent in advertising this Local Plan Review to the district electorate. Not everyone has access to the local Kidderminster Shuttle or Local Press (and there are no free deliveries of this in the parish), nor in this rural parish of Kidderminster Foreign do they have good access to the internet, if at all. Leaflets (A5 Glossy leaflets) we were advised would be posted out to parishioners. These did not arrive. How are local people to know about the Review and developments planned if the District is negligent in advertising these to ALL the people in the district, and not just those in the towns? We would challenge therefore the statement that this Review was either legally compliant or indeed positively prepared as many of the district electorate, particularly those in this parish, were unaware of the Review and its implications. b) The documentation states that the Review has been "informed by agreements with other authorities" Which authorities? How can this statement be truthfully claimed? Certainly, we, Kidderminster Foreign as the local parish authority (the first tier of local government) have neither been consulted nor have we given any agreement to a development such as proposed under WA/KF/3 for the Land at Low Habberley which is within the parish boundary of Kidderminster Foreign. There has been no consultation or agreement with our Parish Council about this proposed development. Justified - we would challenge this on these grounds: a) We feel that the proposed development WA/KF/3 for Low Habberley is not "an appropriate strategy" to meet the housing needs of this area. Whilst we understand the need for affordable housing as starter homes for young couples, we feel that there are other more appropriate sites within the district (particular brown belt sites, and the town centres) where we feel that there are opportunities which could provide sufficient and more suitable housing to meet the Government stipulation with careful and inventive planning. b) The proposal to develop site WA/KF/3 is particularly unsuitable as it comes within a couple of hundred yards of the village boundary of Low Habberley, and will swamp the village, being more than double the number of dwellings, and			

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							irrevocably change the total character of this small rural village. c) In Wyre Forest District Council's Pre Submission document (Oct 2018) it states on page 224 under "Reasoned Justification" 30.51 for inclusion of land for development that "This site is well contained by solid boundaries on three sides". However, in Wyre Forest Local Plan Issues and Options Paper (Sept. 2015) on Page 27 under environmental constraints point 6.12 it says that the area falls within the West Midlands Green Belt, and is therefore subject to Green Belt Policy which "restricts development except for very special circumstances". We do not believe that having a boundary on three sides is a "very special circumstance". Also, the open boundary side of the development proposed invites further sprawl towards the small village of Low Habberley, encouraging a serious erosion of the Green Belt buffer zone between the urban town of Kidderminster, and the small rural village of Low Habberley. This Green Belt buffer zone must be maintained at whatever cost to maintain the integrity and individuality of this small village from being swallowed by the town. d) The Local Plan Review seems to have total disregard for maintaining the integrity of the Green Belt, and does not give any importance or weight to the five purposes of Green Belt as specified: - Check unrestricted sprawl of large built up areas - Prevent neighbouring towns (or indeed villages) merging into one another - Assist in safeguarding the countryside from encroachment - Preserve the setting special character of historic towns - Assist in urban regeneration by encouraging the recycling of derelict and other urban land. The plan to develop on site WA/KF/3 does not comply with at least 3 (possibly 4) of these five purposes, and indeed in the Local Plan Preferred Options Sustainability Appraisal of May 2017, the District Council comment that development of this site "would have a significant negative impact on the integrity of the Green Belt and would not positively address any of the 5 purposes of the Green Belt" and furthermore the District comments in the same document that although close to an existing road network "a development of this site in this location would have a significant negative impact on the surrounding road network". How can opinion have changed so much in just a few months?			

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							e) We would also object by adding that this proposed development is on the wrong side of the urban area of Kidderminster whereby access to the West Midlands Conurbation would prove difficult. A high proportion of district inhabitants commute to the larger industrial areas of Stourbridge, or Worcester, and development of this site would mean that the supporting road infrastructure is not in place to take commuting traffic away from the town centre areas. Planners need to place developments which have easy access to take commuting traffic easily away from the town, not make it worse, and be close to major highway networks; this point should be given a high priority to avoid expensive capital outlay on highway improvements on the wrong side of the town, away from main highways, in this rural area. f) The Parish Council of Kidderminster Foreign are unanimous in objecting to development of site WA/KF/3. Apart from the fact that this land provides an important buffer between the town and the village of Low Habberley, it is also agricultural land with the valuable addition of irrigation. The agricultural output on these fields, therefore, on this site is significantly enhanced by this irrigation feature, and in recent years has provided valuable onion and salad crops – which may be in short supply after Brexit. It is in the national interest therefore that such land is kept in production for the good of the country as a whole, when other more suitable, unproductive sites for housing development could be chosen.			
Hayes Valerie	LPPS659	Policy 30.21		No			I disagree with this proposal to build on the Green Belt it's very close to Habberley valley which is a local nature reserve and beauty spot. I believe the Green Belt should be respected and preserved. It is used primarily for growing crops providing local employment. It will also caused congestion on these roads which is at present quite difficult to exit from low Habberley at the island on that road.	I disagree with this proposal to build on the Green Belt it's very close to Habberley valley which is a local nature reserve and beauty spot. I believe the Green Belt should be respected and preserved. It is used primarily for growing crops providing local employment. It will also caused congestion on these roads which is at present quite difficult to exit from low Habberley at the island on that road.	No	
Wilcox Richard	LPPS661	Policy 30.21		No		Justified	Why Allow Building on Green Belt land in Kidderminster? Having read the publication of the local plan, I was very disturbed to read that 5.6 acres of greenfield land in the Green Belt at Low Habberley (WA/KF/3) is proposed as sites for housing. The centre of Kidderminster is like a ghost town in the evenings. Kidderminster obviously took a massive hit as a result of the decline in the carpet industry. Now in common with towns across the Country, another problem is occurring		Yes	May I also add the comment that it has been made particularly difficult to send in a response. The Wyre Forest website had a banner headline announcing that the consultation was going

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							through the rise in internet shopping and internet banking. Unfortunately, I see no prospect that this will be reversed. In fact, it can only get worse. At the present rate of decline the amount of retailing in Kidderminster is likely to be very much less than it is now by the time this proposal comes to fruition. news.sky.com — 15th November 2018: NEXT, The FTSE 100 retailer said it had experienced its toughest period in a quarter of century as pre-tax profits for the year to 27 January 2018 slipped 8% to £726m - and said more “challenging” times were to come. High Street crisis: Shops closing at a rate of ‘14 per day’ The crisis facing the high street is set to “intensify” after shops closed at a rate of almost 14 a day in the first half of the year, a report says. Like-for-like full price sales in stores fell by 9.1% while in marked contrast, online full price sales were up 11.2%. The big banks have closed 1700 branches in the last five years and more closures are planned Source: The Guardian Office space must follow suit in becoming less needed as the internet makes it progressively less necessary to have a physical base. This situation should be contrasted to towns on the Continent where town centres bustle because there is lots of living accommodation in the centre of towns. I would invite anyone who doubts this to visit Baden-Baden in Germany. It is my honest opinion that even now, a significant proportion of the town centre must be viewed as Brownfield Land and this supply of brownfield land is increasing. The Local Plan is a real opportunity to re-invigorate the town centre by making really good living accommodation in the town centre. I walked around the centre of Kidderminster on 3/12/18 to look for empty properties. I was surprised to find just how many premises are taken by charity shops. Charity shops obviously have their place but really do not replace standard retailing of new products. Their number is further evidence of problems in the high street. There are 12 in all (maybe more if I have missed any): British Heart Foundation St Richards Hospice Acorns Kemp Hospice Kemp Hospice clearance shop Sense Hospital League of Friends Forces Support Scope Mind			on but this headline did not include any link to allow response. The link to the response document was hidden in the small print. On opening the response document, I found that it was in a non-editable format. The only way that I was able to use it was to use copy and paste into a new document that I created on my computer. Was this difficulty intentional with the purpose of discouraging responses from all but the most keen?

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							Happy Staffie Forest Dogs Rescue I parked in Upper Mill Street and walked around the centre looking at premises with “sale or to let signs”: In Mill Street there is the old telephone exchange with parking behind, a sign said it was a total of 1 acre. Beside it was an empty Pizza shop. The office building of the Conservative Club states that it has 4174sq feet empty In Park Lane there is a very large derelict former mill building but no sale sign The former Job Centre building is empty and, although a new building, will soon become dilapidated if simple maintenance tasks such as gutter clearance are not done — total 7379 sq feet Crown House has been empty for years. Floor space not stated but must be huge. With new cladding and imaginative re-design of the interior, this could be a really nice apartment block Further down lower Mill Street, the former Kidderminster Pharmacy is empty, 13 Bull Ring is empty and for sale but advertises that it has planning consent for 4 apartments In Church Street numbers 1,3,7 and 27 are empty with For sale signs. No 27 carries advertising that it has planning consent for 8 dwellings On High Street above Payers shoes outlet is empty space advertised at 13470sq feet The former Woolworth building advertises 65000sq feet of empty space. This is I admit unlikely to be viable to be renovated as living accommodation, but one thing is certain and that is that it will never be Woolworths again, nor indeed any other large single retail outlet. In Coventry Street there are at least three empty shops where the former Kidderminster Shuttle office was and next door the former “wash house” premises. On the first and second floor of this very large building there appears to be masses of empty space Continuing along Worcester Street I counted at least 13 empty shops including the former Royal Bank of Scotland premises, all with potential living accommodation above In the Swan Centre, there appeared to be seven empty units. There are large former industrial buildings opposite Aldi on Green Street, one of these advertising 0.83 acre and another large empty site where a building was burned down some years ago near to Iceland In Vicar Street there are again empty shops and empty first floor above Thomas Cook, Carphone Warehouse etc.			

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							Proceeding towards the Town Hall above WHSmith, Trespass, there appear to be three complete upper floors of these magnificent buildings empty Directly opposite the Town Hall there are five shops with potential accommodation above, all empty In the Rowland Hill Centre I counted 4 empty shop units The former Law Courts Building on Worcester Road is a magnificent building but again deteriorating severely due to lack of simple care but could be reused as living accommodation The former Leisure Centre site on Prospect Hill is empty, the sale sign states it is 3.56 acres The former Kidderminster Hospital site on Bewdley Road has a large amount of empty buildings Of course, some of these buildings will not be suitable for conversion to housing. If this is the case, they should be demolished and replaced with purpose-built state of the art housing blocks. I realise that the large house builders love to build on greenfield sites — they must be very profitable (how else would they be able to pay their chief executive a bonus of £75million?) This however is a very poor reason to encroach on Green Belt land. There really is loads of scope for development of good affordable housing and also for high end of the market apartments in and around the town centre if only the house builders were forced to make the effort and not given the easy option of Green Belt land. Site WA/KF/3 is good agricultural land and has irrigation. It is at present used for growing high value crops. This agricultural use should continue. The purpose that the Green Belt was established in the first place was to stop urban sprawl and to avoid towns and villages merging. This principle should be maintained and the Green Belt allowed to do exactly what it was set up for. I see absolutely no justification for this area of Green Belt to be covered with housing. The Council should look at what it can do to encourage the retailers that remain and to encourage landlords holding empty buildings to do something with them. Cutting business rates for occupied shops and doubling and redoubling business rates for empty properties might be a strategy to consider.			
Becker Margreth	LPPS633	Policy 30.21	No	No			We are worried about plastic In the oceans but not about our local wildlife. The proposed estate of 120 houses would be built very close to Habberley Valley, a Nature Reserve. The valley walks end	I do suggest to build all brownfield sides up and give nature a change for everybody involved including us and our children.	Yes	

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							very close to High Habberley which borders on the site and I don't think animals know borders. Of course there would be a lot of light and noise pollution. Some people will keep pets and one likely would have more cats and dogs in the valley (another pressure on the wildlife). Habberley Valley is known to have raptors, owls, bats, adders, green woodpeckers, greater spotted woodpeckers, yellow hammers. The 'Habberley Valley Circular Walk' published by English Nature and Worcestershire Council mentions also the 'occasional hare'. It does not mention that one finds badgers and deer. We had put a night camera and after Just one night managed to photograph a badger close to the proposed building site. The Valley is an oasis for nature. Kidderminster itself has a long list of empty buildings which could be turned into beautiful and light apartments. Coming from the Continent I having grown up living in apartments. I know they can be fine and they do not have to be a recipe for social deprivation. But one does not have to go abroad to see this. Birmingham, Liverpool, Manchester have inner town apartments that are really lovely and sought after.			
Lilley Karen Petition Members	LPPS144	Policy 30.21	Yes	No	Yes	Positively Prepared	Re: Proposed Build Low Habberley Ref WA/KF/3 Environmental Proposed build at Low Habberley will have a significant impact from an environmental perspective: Presently the B4190 acts as a boundary to the sprawl of a built up area thus beyond this point we have access to prime agricultural land with full irrigation, such prime farming land must be seen as of the utmost importance with food shortages 'Britain is running out of land for food and faces a potential shortfall of two million hectares by 2030 according to new research. The report, from the University of Cambridge, says the growing population plus the use of land for energy crops are contributing to the gap. This report shows that agricultural land will need to be multi-functional, delivering a range of goods and services. We will need the full range of tools to meet future demand, employing the very best technology and innovation to drive efficiency, quality, yields and profitability." Andrew Montague-Fuller says that there is a danger that the future farming landscape of Britain might not be compatible with the country's needs. He said: "We may well find that there's a large amount of the land growing biofuels, has solar panels and wind farms on it, when actually we need more land put aside for the food		No	

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							needs of our growing population.' (Matt McGrath 2014) Key Reasons to protect farmland: • Community food security. With rising oil prices, increasing food shortages, and a changing global climate, we need to enhance and retain the ability to feed ourselves, as well as future generations, farmland is finite and irreplaceable. Good soil takes years to be created and cannot be manufactured overnight. • Economic development opportunities. Markets for locally grown and processed foods are expanding putting more money into the hands of farmers and rural communities. But these growing markets depend on the land remaining productive and available for agriculture. • Ecological integrity. Well-managed agricultural land provides ecosystem services, such as flood control, groundwater recharge, wildlife habitat, carbon banking, and open space. • Farmland is critical to protecting and promoting regional food systems programs. More and more regions and urban areas are looking to create local food systems, and want to ensure there is a source of high-quality, healthy food. Not only does supporting local farms provide this, but it also provides a stable and higher paying market for these growers and decreases costs for consumers by decreasing marketing costs by farmers. This land has the benefit of an irrigation system and is used for food production - an important consideration in the current political climate • Farmland is green space, even though many don't think of it that way. It is a significant contributor to environmental quality. Farmland provides food and cover for wildlife, help control flooding, (There is a lack of drainage infrastructure in the area) protect wetlands and watersheds, and maintain air quality. They can absorb and filter wastewater and provide groundwater recharge. New energy crops even have the potential to replace fossil fuels." • Farmland provides fiscal stability to local governments and boosts the economy. It does this by contributing to a community's infrastructure and helps a local economy through sales, job creation, and support services or businesses. • Tourism - A key benefit to maintaining key Green Belt areas is tourism, or more specifically, agri-tourism. There are plenty of places that people visit to see rural scenery / farmland and the area at Low Habberley is seen as the gateway to key areas of recreational land in particular that of Habberley Valley. • Health & Wellbeing – this is of key importance to all councils as mentioned within the report			

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							9.2 Health challenges for the district include obesity in children and in adults, mental health, limiting long term illness or disability and increased numbers of people living with dementia This land provides benefits in terms of privacy, recreational opportunities (walking, horse riding), biodiversity and several other ecosystem services. Perhaps most important is the opportunity to see and potentially access open space, some local residents our unable to access many recreational areas and leisure facilities due to health and mobility however they live alongside this open Green Belt which assists in improving mental health and wellbeing. • Loss of Identify This proposed build would start to merge Kidderminster and Low Habberley, one of the fundamental reasons for Green Belt is to keep towns and villages separate, maintaining history and identity thus to check the unrestricted sprawl of large built up areas, this build would more than double the population in Low Habberley and clearly the infrastructure is not sufficient to manage this. • Jobs – The farmland provides jobs for those with a range of skills and while some may be seasonal such as the fruit and vegetable pickers there are many other roles which continue throughout the year and as with many industries it's not only the immediate frontline staff but the supplies chain that would be impacted if land was lost to residential. The need for building more homes is understood but has to be measured against the high cost of losing Green Belt and valuable agricultural land. Many objections will be looked upon as 'not in my back yard' attitudes but concerns for the loss of the Low Habberley are greater than this, and the concern is with more than just local residents but those who access the area for recreational reasons, the loss of such a versatile and beautiful area from the wider community would be great indeed.			
Hyde-Fynn Amy	LPPS716	Policy 30.21	Yes	No	Yes	Justified Effective	The land at Habberley is used daily by walkers and dog walkers. There is a stile and various points of entry to allow people to walk in a more natural area and allow their pet some freedom, rather than having to keep them tightly leashed and allow them to foul the pavements; where despite warning signs many refuse to clean up after their pets. Not only would this land being converted deprive local residents of the use of it, it is also likely to lead to more reports of dog mess on the pavements. The land is farmed, and produces a fair quantity of food each year. If Green Belt land must be released, then it make more sense for it to be land not used to produce food.	The land in question is used not just for the local production of food, but daily by joggers and dog-walkers.	Yes	It is difficult to get across all of the reasons, and the explanations, in a limited space.

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							I am also aware that there is an oil pipeline crossing this field. It was raised when we purchased our home as the disused one crosses our property boundaries. As the one crossing this field is a current one, this may cause issues with the development, sale and resale of properties on this land.			
Richborough Estates	LPPS829	Policy 30.21 Land at Low Habberley		No		Justified	More suitable description of site is land north west of Habberley Road, Kidderminster. The requirement in paragraph 3 of the Development to be set back from bridleway to protect setting of High Habberley House, to be removed. Habberley House is not a designated heritage asset and afforded no special protection.	Rename site to land north west of Habberley Road, Kidderminster. Remove third requirement of policy.	Yes	We would welcome the opportunity to attend the examination hearing sessions to discuss the issues we have identified which affect the soundness of the plan, and to meet with the Council to discuss the evidence base when it is further evolved.
Pre-submission Anonymous	LPPS953	Policy 30.21, Land at Low Habberley WA/KF/3					I wish to lodge my very strong objection to the site ref WA/KF/3 as a site under consideration for 120 dwellings to be erected. My objections are as follows: Years ago planning approval was refused for the fields around Ferndale Estate including this plot of land for development. The reasons given for refusal was that all of this land is Grade A agricultural land and there is not much land with this excellent grade in Worcestershire, and the land produces good crops, and food production is essential, especially with Brexit approaching. This area was also designated a site of "Outstanding beauty", and I want it to stay that way. I also think that our councillors and planners should look harder for brown field sites before encroaching on to Green Belt land wherever it is situated. Why cannot the site of what was The Glades be used for housing and bring footfall into the town also the empty shops in Worcester Street be developed to put flats above, there is also Park Lane's disused building. My other objections are the problems that we have now with traffic congestion. How much worse is this going to be for the residents of Ferndale who have to wait at the junction by the mini island for, at times ten minutes to cross the traffic onto Habberley Road towards the police station, the traffic coming down Habberley Road from Bewdley seems to be never			

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							ending particularly in the morning and afternoon? There is also the problem that will occur if the proposed Theme Park on the former site of the Habberley Golf club is given permission to go ahead. A large number vehicles are expected including coaches, lorries and other commercial vehicles. Habberley Lane, Low Habberley cannot possibly cope with this amount of traffic as the road is narrow, and we Ferndale residents will be even more inconvenienced than we are now especially where the entry to this new site is being proposed, we too are entitled to consideration. I must not forget the long delays for the Safari Park which causes gridlock at weekends and school holidays and again this impacts on Ferndale residents. I hope that you won't forget this. Another objection is that we do not have the infrastructure for more dwellings. Schools are" bursting at the seams" More cars will be using these roads to get to Redditch and Worcester Hospitals, doctors surgeries are few and far between and over subscribed, and bus users are badly let down by poor service. Emergency vehicles will not find it easy to get from A to B. Every new dwelling built in this area will add to traffic congestion. This should be turned down.			
Cameron Homes	LPPS771	Policy 30.19	Yes	Yes	Yes	Positively Prepared Justified Effective Consistent with National Policy	We write in support on Policy 30.19 which identifies the former Stourminster school site as a residential allocation. The site has been confirmed to be surplus to requirements by Worcestershire County Council and approval has been received from the department of education to dispose of the site for an alternative use. As a site within Kidderminster Settlement boundary, has a strong residential context and good access to services and facilities, a residential use is the natural and sustainable alternative. Following the publication of the Site Assessment Paper, Cameron Homes has now been confirmed as the preferred bidder for the site. Cameron are looking to drive this site forward and are in the process of a full planning application for the residential development of this site. As part of this process Cameron have had positive pre-application discussions with the Council in relation to a scheme of 56 dwellings. The final survey work is being undertaken and the planning application will be submitted in the new year.	Criteria 2 in Policy 30.19 It is our view that the requirements of Criteria 2 are overly specific, and that greater flexibility should be allowed in the policy text to facilitate an appropriate solution to be agreed in relation to biodiversity and surface water drainage. For example@ "Measures to provide ecological protection and enhancements and a strategy to deal with surface water drainage should be submitted with the planning application." Pre-submission Policy Map We note that the proposed residential allocation fro the Stourminster school site is overlapped by the open space designation for the adjacent playing fields. It is assumed that this is a drafting error as the school site and the adjacent playing fields are two distinctively separate sites. To avoid confusion in the future, the open space	Yes	In order to provide the inspector with the latest position in relation to the progress of the planning application, findings of the detailed survey / assessment work produced to support the planning application and feedback from consultees.

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							The progress in relation to the scale of the site supports the conclusion in the Housing and Economic Land Availability assessment 2016 that the site is deliverable within the next 5 years. Cameron Homes will develop the site and we anticipate that the site would be fully delivered and occupied by June 2022, allowing for the grant of planning permission, discharge of conditions, demolition / site works and the development of all the houses. In addition to securing the redevelopment of a previously developed site in the urban area as supported by Paragraph 118 c of the National Planning Policy Framework,the proposal also offers the opportunity to secure enhancements to the wet woodland in the south eastern part of the site. The wet woodland is in a poor state of repair and would benefit from appropriate management. Cameron Homes intend to protect and secure enhancements to this woodland, and this would be a clear and significant benefit of the residential allocation. The site assessment paper correctly identifies that the constraints identified relate to the woodland corridor, rather than the location of the school buildings and associated playground. With the residential development focused on the school buildings and associated playground, there would not be any direct conflict in this regard. In this context, Policy 30.19 is positively prepared because it would serve the redevelopment of a brownfield site in the urban area that has been identified as a surplus to requirements; is justified because it is based on the evidence surrounding the site; effective; and consistent with National Policy. Criteria 2 in Policy 30.19 The only part of Policy 30.19 that we do not support is the second of the development criteria set out, which requires the provision of a 'pond'. This is overly prescriptive in the context of the Framework which allows for the appropriate solutions to be agreed in relation to biodiversity and surface water drainage in the context of the site in question. There has been nothing through the work undertaken to date or in the pre-application discussions with the Council that would suggest a 'pond' is essential or to suggest that other methods / measures will not achieve the underlying objectives of Criteria 2 in relation to biodiversity protection /	designation should be reduced so as not to overlap the proposed residential allocation. To assist in defining the extent of the proposed residential allocation, the plan in appendix B of Chapter 30 'Site Plans for OC/11 Stourminster School Site is an accurate reflection of the extent of the residential allocation.		

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							enhancements and surface water drainage. Consequently, we consider the wording should be amended to allow for an appropriate solution to be identified for this site.			
Sport England	LPPS283	Table 30.0.1, Policy 30.29		No		Positively Prepared Consistent with National Policy	Sport England objects to the allocation on the LI/12 Burlish Golf Course site. Neither the council's PPS or BFS assesses the need for golf courses, with no evidence has been prepared to demonstrate that the golf course is surplus to requirements. There is no provision within the policy allocation for securing equivalent or better provision elsewhere to address paragraph 97b of the NPPF. The loss of the existing sport facility with the allocation of employment does not accord with the guidance in paragraphs 96 and 97 of the NPPF.	Amend Table 30.0.1 in policy 30, to remove allocation LI12, or to include provision within the plan for appropriate investment in an equivalent or better provision of sports facilities in a suitable location to accord with paragraph 97 of the NPPF, and in accordance with the evidence in the Council's Playing Pitch Strategy and Built Sports Facilities Strategy.	No	
Lilley Karen Petition Members	LPPS143	Policy 30.21	Yes	No	Yes	Positively Prepared	Proposed Build Low Habberley Ref WA/KF/3 Concerns raised in regards to proposed build at Low Habberley site Kidderminster in foreign parish. Traffic concerns have been raised in relation to this site due to present traffic conditions, challenging access to and from existing residential areas which will be compounded by proposed site build. The B4190 has a number of issues already in existence, speed of traffic and volume. It can be witnessed on a daily basis with traffic being backed up from the island on Low Habberley and extending in all directions. Significantly the traffic can often back up the full length of Habberley road past the present turning to the Habberley estate down towards Bewdley. With the entrance to the new site being suggested as being on this road volume and safety is a concern. • Residents attempting to leave Hillside Drive and the Habberley estate have tremendous difficulty due to traffic levels and this proposed build would make the access to Hillside in particular incredibly difficult. • Volumes of traffic on B4190 Habberley road also impact Low Habberley and access onto the Ferndale estate which if planning were to go ahead could prove to be a 'rat run' for commuters increasing risk to residents in particular elderly and school children that already need to cross the very busy B1490 road to access services. • Increased traffic over number years has led to both islands one at Low Habberley and one at Franche Road being under strain which means that the traffic can be backed up between the two islands, it has also become clear to residents at Low Habberley that this has led to many people using the Shattersford road to either come to Kidderminster or Bewedly and these roads are unsuitable for this increase in volume. • No alternatives to car use via a train as there are no such		No	

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							services this side of town and buses around the Ferndale and Habberley areas have now been severely cut or removed. • When attending council meeting and asking about the traffic review being done in relation to this and the other suggested sites we were informed that a report is done specific to a site, this creates a false picture as it does not take into consideration increased traffic in relations to other sites being developed at the same time such as: Proposed development of Lea Castle site of up to 1100 houses, while most would travel via Stourbridge and Wolverhampton Road due to the constant bottle neck in Kidderminster area known as Horse Fair which grinds the centre to a halt new residents may seek alternative routes such as via Franche Road again increasing strain on area. Proposed development of Sion Hill school site which would again mean the use of the same roads. Proposed sites in Catchems End Bewdley will mean that new residents/commuters will select Habberley road once again increasing the strain on this already strained route. Crocky Trail adventure Park to be built on the site of Habberley golf course, we very much hope that this site will be refused for this type of installation but as the company has already started to install activities and has built toilet blocks, monitoring station, entrance canopy and decking areas and is only now asking for retrospective planning I think a clear contempt of due process is being shown and this level of confidence/arrogance leads us to believe that they have every confidence in getting proposed planning accepted even without proper consultation with their local residents. This company is hoping to attract 1000 visitor per day and will be open 365 days a year, being open from early morning till 9 in the evening. To get a true view and understanding of traffic impacts each proposed sites need to be considered both individually but also as a whole. • The proposed build is the opposite side of the town for potential residents to access most local work opportunities and as previously stated there is insufficient public transport to support area which will mean new residents will need to drive. There is also no easy access to major road networks. We appreciate that the council are looking at many brown land sites but also that we have areas marked for business development/retail, however we also have a number of areas which have already been earmarked to help with new business initiatives that have not been taken up in which case should such areas be looked again and perhaps looked at for residential areas – many towns have successfully rejuvenated			

<table>
<tr><th>Respondent</th><th>Response No.</th><th>Part of Document</th><th>Legally Compliant?</th><th>Sound?</th><th>DTC?</th><th>Reasons for being unsound</th><th>Summary of Response</th><th>Suggested Modifications</th><th>Attend Oral Examination?</th><th>Reason for Attending</th></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>their area by bringing residential areas into town or ‘city’ living which is often of interest to first time buyers and those downsizing. Within the councils report such a concern has been raised
• Concern regarding the amount of employment land required when units at Easter Park have taken a long time to fill and are not all occupied.
It is understood that the council are under great pressure to identify suitable areas to build homes to meet targets set by government but it is very possible that with the decline in the population as seen in some areas there may be sufficient brown land sites and it is also extremely possible that future brown land sites my become available in the coming years as industry moves and/or changes its needs in which case we feel that to have this area of Green Belt under consideration is ill advised and premature.</td><td></td><td></td><td></td></tr>
<tr><td>Kidderminster Harriers Football Club</td><td>LPPS773</td><td>Policy 30, Table 30.0.1</td><td></td><td>No</td><td></td><td>Positively Prepared
Effective</td><td>Wish to change table 30.0.01 in policy 30 Kidderminster Town to include allocate for housing the Aggborough stadium and car park site for housing (total approx. 96 units) subject to the relocation of Kidderminster Harriers. This is in accordance with the NPPF which seeks to ensure delivery of housing. The allocation would assist the delivery of new dwellings in accordance with the LP spatial strategy and reduce the need for other proposed housing allocations which may be in less suitable locations. The site is likely to come forward for development in the LP period.</td><td>Amend table 30.0.01 include allocate for housing the Aggborough stadium and car park site for housing (total approx. 96 units) subject to the relocation of Kidderminster Harriers. This is in accordance with the NPPF which seeks to ensure delivery of housing.</td><td>Yes</td><td>This is to be decided at a later stage in the plan making process.</td></tr>
<tr><td>Severn Trent Water Ltd</td><td>LPPS167</td><td>Policy 30, 31, 32, 33, 34, 15</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Positively Prepared</td><td>We would like to draw your attention to the High and Medium risk sites which we would be keen to discuss further to understand likelihood and growth trajectories.
<table>
<tr><td>BW/4</td><td>STOURBRIDGE ROAD ADR</td><td>Known hydraulic flooding risks downstream, combined risk to Hoobrook Terminal Pumping Station with Lea Castle Growth.</td><td>Medium Risk</td></tr>
<tr><td>WA/KF/3</td><td>LAND AT LOW HABBERLEY</td><td>Known hydraulic flooding</td><td>Medium Risk</td></tr>
</table></td><td></td><td>No</td><td></td></tr>
</table>

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							<table><tr><td></td><td>PHASE 1</td><td>risks downstream, combined risk to Hoobrook Terminal Pumping Station with Lea Castle Growth.</td><td></td></tr></table>			
Richborough Estates	LPPS826	Table 30.0.1		No		Positively Prepared Effective	Table 30.0.1 'Allocated sites in Kidderminster' identifies an 'indicative' capacity for dwellings at each of the allocated sites. It could therefore be that sites deliver less than the indicative figure shown, which risk the plan's supply under delivering, and ultimately the Council's position to demonstrate a five year housing land supply.	Modify table 30.0.1 to be expressed as a minimum to ensure the plan is positively prepared and effective in meeting the district's housing need.	Yes	We would welcome the opportunity to attend the examination hearing sessions to discuss the issues we have identified which affect the soundness of the plan, and to meet with the Council to discuss the evidence base when it is further evolved.
Pre-submission Anonymous	LPPS945	Policy 30 Kidderminster Town					We have premium farm land that should not be built on whilst there is plenty of brown field sites around Kidderminster for example Green St.- Park Lane- Worcs st - the old Magistrates Court but to name a few we need to keep and maintain our agriculture land need to inject new life in to the town by converting existing buildings & demolishing old factories it is for our future generation the town needs life.			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 31: LEA CASTLE VILLAGE

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Hinksman Judy	LPPS671	Policy 31	No	No		Justified	The original local plan indicated 600 homes to be built on Lea Castle site. This was much more acceptable then the proposed 1400, which would now mean building on Green Belt land. I believe there is a conflict of interest. Amex/Foster/Wheeler conducted the Green Belt Review in 2016/17 and are also the agents acting for Homes England who won the Lea Castle Site. I feel the Green Belt Review should be redone independently.	It is my understanding that Green Belt land can be used only in "exceptional circumstances". Why are identified brownfield sites not being using first. The current proposals would take an adverse affect on the environment, pollution, traffic, schools and doctors. (Section 31.3 para 2.3) the proposals do not address the needs of the Housing Needs Survey which identified more affordable housing and 2 bedroom downsizing homes. the 25% rational quote would not be met. the roads, towns and rail car parks are already fully congested. The proposed housing would attract affluent commuters thus making things worse.	No	
Nicholls Christopher	LPPS847	.Policy 7A	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Green Belt Conflict of interest by AMEC by undertaking reviews and now advising Homes England. Not consistent with National Policy in particular NPPF Para 136 relating to exceptional circumstances. Lea Castle Village No evidence that there is a need for a development of this size. Infrastructure highlighted in 31.1 is extremely limited - certainly not sufficient for 1400 homes.	Green Belt recent studies need to be revisited. An independent planning enquiry is required to establish whether exceptional need has been met. Infrastructure needs to be re-examined. The proposed community facility is insufficient. 'Potentially a G.P Surgery' needs to be examined.	Yes	I consider it absolutely essential that a more local perspective is given on the impact that a new larger village will have upon both the residents of Cookley and residents of the proposed development. Also it is necessary that the Green Belt is preserved.
Worcestershire County Council, Planning Economy & Performance	LPPS989	Policy 31					Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource). WFR/WC/32 Lea Castle East WFR/WC/33 Lea Castle West WFR/WC/34 Lea Castle North	Part of this site was previously allocated and therefore has been removed from the Mineral Consultation Areas proposed in the Fourth Stage Consultation on the Minerals Local Plan as a Mineral Safeguarding Area, but a larger area is now proposed for allocation and therefore Policy 31.2 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.		
Palmer	LPPS543	Policy 31	No	No	No		* Not Clear on alterations necessary to roads * Concern with over development of site, using Green Belt land * No definitive plan for GP surgery	Local Plan— Lea Castle Site Since writing last year, our views on the		

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							* Allocation of dwelling types not confirmed * Concern with secondary school provision * Increase in hospital facilities, ambulance, fire, police to cope with increased housing?	development of the Lea Castle site have not changed dramatically since attending the recent local drop-in session. • We are not opposed to the development of this site for dwelling, light business and community facilities but allowing all the Green Belt areas of this site to be developed is not acceptable and we are very concerned with the OVER development and number of increased dwellings and the fact that these will be built close to the A449. • The Sion Hill & Hurcott/Stourbridge Road development does not seem to be counted in the Lea Castle dwelling figures and we feel strongly that this should be. As stated the proposal for 56 dwellings on this site and 91 on Stourbridge Road/Hurcott MUST is added in to the mix as this is a lot of development in one area. All of which will have a MAJOR impact on the same roads/amenities/schools etc as the Lea Castle development. These developments will neighbour each other and results in a lot of building in one area. With reference to 31.2 of the Plan. • It is not clear from the plan, the plans/proposals are for changes to roads and junctions that WILL be necessary to sections of the A449 and surrounding roads to ensure congestion is minimal and safety is high. We would like to see a consultation on this before any development on the site is permitted. The impact the increased residential/commuter, visitor, employee/business traffic will have on the surrounding roads will be significant. The junction in/out Cookley — a regular for RTAs, fatalities — one in recent weeks) - a busy junction on fast road/bad bend. Not particularly well lit at night (on the forest side) and can be a nightmare at peak times of the day to get out of—we have witnessed many near misses. The bend by Axborough Lane, the Caunsall cross roads at the A449 and the turning into Axborough Lane all the same as		

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								above, accident hot spots. Secondary access from the Crescent and from the Main Park Gate Road will only make this and surrounding roads more congested and dangerous if not dealt with appropriately. • At all costs Cookley, (Castle Road, Lea Lane and the Caunsall Road and cross roads) MUST be prevented from becoming a rat run to Wolverley/Kinver/ Kidderminster and other outer lying areas by creating smoother traffic flow on the A449 and A451 so a rat run through Cookley is not the favoured alternative. Lea Lane hosts a Primary School, GP Surgery, a large elderly population, Village Hall and recreational grounds and these should be protected from commuter and general traffic for obvious safety and pollution reasons. • Axborough Lane - although it is only proposed that a small amount of houses access this road, it will inevitably be a choice road to cut through to the Stourbridge Road if people exit via The Crescent. This road is narrow with a blind summit and very poor visibility for exiting at both ends. Entry and exit into this road, at both ends is also a concern if used more regularly. • We appreciate you have said Lea Castle will be self-sustainable and we agree that every effort needs to be made to minimise the need to travel outside of Lea Castle to ease congestion and travel on the surrounding roads. Therefore dwelling types is an important factor (see below). With Reference to 31.1 of the plan • To quote the wording 'Perhaps a GP surgery' is not acceptable this should be a MUST - local GP surgeries are already pressured! • Primary School is a MUST but what about a Secondary school? The solution of expanding school places at existing Secondary schools is		

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								not acceptable — the infrastructure around, for instance, Wolverley Secondary School is such that increased traffic along these roads, through a small, historic village will have a significant impact. Including pollution and safety to children walking to school. The road leading to the school is congested every morning and sometimes grid locked when adding the school buses into the mix. Reliance on the local pub carpark for dropping off and collecting is tenuous as the pub could stop this at any point and if this were to happen even today, this would cause chaos as it would mean more parents driving up to the school. Increasing buses is not necessarily the answer given that the current provider, Diamond, is diabolical, unreliable and on occasions could be considered dangerous. Wolverley Village residents must be considered. A proposed primary school of 420 places primary school is huge well over twice the size of Cookley School (indication that Lea Castle Village would be twice the size of Cookley and overpowering in population and residential, occupational and visitor traffic). Where are these students to go when they leave primary? Cookley/St Oswalds/St Marys and Wolverley Sebright are feeder school for Wolverley Secondary — so a potential 60 student intake from Lea Castle alone (not counting Sion Hill/Hurcott development) may jeopardise places for current incumbents of the other feeder schools. A considerable impact for a secondary school on buildings, teaching and accessibility as stated above. Other secondary schools will also be under pressure to find extra places for students from proposed building developments near them. Dwelling types on Lea Castle: Any development on this site should include a good proportion of affordable houses BUT MUST also include LARGE proportion of specialised accommodation for the elderly in the form of low-level bungalows and apartments as you have indicated in the Plan.		

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								Provision for this on the Lea Castle site is not clear from the plan. This is an opportunity to address this at Lea Castle. Dwellings should be ring- fenced purely for the over 65 with facilities on site appropriate for our ageing residents e.g. clubs/community facilities, hairdressers, GP surgery. We all have elderly neighbours stuck in 3/4/5 bedroom houses because bungalows are rare, expensive too big and not necessarily local to where they have spent the majority of their lives, close to friends/families. Apartments have a place BUT bungalows (in varying sizes) should be there as an alternative to those who don't want apartment living. Good bus services are essential to alleviate the need to drive and for those who can't drive. Considerable provision for this type of housing on this development may result in fewer drivers on surrounding roads at peak times (commuting) because of the very nature of their age. Providing appropriate facilities on site would also negate the need to use the car on a daily basis. We are living longer and there is a need for these types of dwellings so that the middle section of housing (3/4 bedrooms houses) can be freed up, lessening the need to keep building more houses. On a positive note providing such facilities for the elderly may create much needed employment. Covenants on affordable houses: We feel very strongly that a covenant should be place on any affordable houses built so they remain affordable houses if sold on in the future, that they cannot be extended in size (so remain in the affordable price bracket). It should also be that these houses cannot be bought as second home rental houses for obvious reasons of rental prices becoming unaffordable (greedy landlords). They should be protected and always remain available as affordable. Failure to do this will result in more affordable houses required to replace the affordable houses that are no longer affordable and a threat to more Green Belt land!		

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								Environment: What measures will be made by WFDC to ensure/prevent any 'accidental' damage/removal to the current landscape/ancient woods that are to remain insitu? Hospital: One of our major concerns, which does not seem to be being addressed as part of the proposed increase in housing in Wyre Forest is the lack of a General Hospital with A&E facilities. It is time for the WFDC & WCC to push for Kidderminster to be upgraded. In the process ensuring the Wyre Forest and surrounding areas have local access to all NHS services (lessening the need for patients/visitors to travel reducing impact on traffic). This will also increase employment opportunities which Kidderminster, with an expanding housing and a depleting carpet industry needs. Worcester and Russell's Hall are always under pressure which will only get worse with increases in housing in their areas. Has the Lea Castle site ever been considered as an Emergency Services Hub (hospital, ambulance, police/fire stations)? As the plan states the fire and ambulance sites will be developed, the same could be achieved by re-locating the police station and hospital to a bigger site. Will our police/fire/ambulance services increase in personnel to be able to manage the increase in housing a in Wyre Forest?		
Matthews Roger	LPPS545	Policy 31	No	No	No	Consistent with National Policy	There is insufficient provision of affordable housing (Policy 8b) The National Policy Framework (paragraph 136) states clearly that Green Belt land should not be altered. There is no justification for it. Adjacent roads will not cope, neither will local amenities. There appears to be a conflict of interest because the Green Belt review was produced by Amec (2016/17). From 2017 Amec are the consultants employed by the developers "Homes England". This is a disgrace and should never have been allowed - being blatantly biased.	A further Green Belt review should be conducted by independent consultants. The 25% affordable housing requirement should be strictly adhered to. There are many brown field sites in Wyre Forest that are still not included in the local plan. Using Green Belt land should not be allowed as an easy option by WFDC	No	
Anderson Megan	LPPS547	Policy 31	No	No	No	Positively Prepared Justified Effective	As a Cookley resident I have not received any form of notification about this proposed building site, this proposal has all been rushed through with no consultation with any local people we have not had the opportunity to have our voice	I feel the review of Green Belt site needs to be carried out again with an independent body, to ensure this site is fit for purpose, which I	No	

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						Consistent with National Policy	heard over this development. The local authority declared this site as Green Belt for a reason. At the time they must have felt that: To check the unrestricted sprawl of large built-up areas To prevent neighbouring towns from merging into one another To assist in safeguarding the countryside from encroachment was a good enough reason to protect our countryside for our next generation I also believe this development will increase the issues we have with the lack of transport, health and education infrastructure in the surrounding area.	feel it is not. I have not seen any plans for any amenities to be added to the site which means our local schools that currently are close to capacity will be under more pressure. Also the doctors surgery which once again is hard to get appointments will be even more over crowded. Focusing on the transport links, the local labour market with Wyre Forest only having 0.64 jobs per person against a UK average of 0.84 which in my view suggests that the Wyre forest isn't the place to build new houses as the jobs aren't in the Wyre Forest. Any additional population would be travelling out of the area but the transport links cannot sustain this. I feel all of the above makes this proposed site unsound for the local area.		
Cox Dean	LPPS550	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	AMEC Foster Wheeler carried out the Green Belt Review in 2016 and 2017. They have advised Home England on Lea Castle since 2016. This is a conflict of interest. 7.7 & NPPF paragraph 136 Green Belt boundaries should be only altered where exceptional circumstances are fully evidenced and justified. WFDC have not done shown justification. WFDC have treated all the villages within the Parish differently. Caunsall is designated 'washed-over Green Belt' but two sites in the Green Belt have been listed for potential development: WFR/WC/36 and WFRIWC/37. Cookley is termed surrounded by Green Belt but development will be allowed in the Green Belt. Wolverley is washed-over Green Belt and development with no sites for development within the Local Plan. This is not consistent with National Policy for Green Belt. Policy 31.1 Lea Castle Village Vision Paragraph I — 'Affordable housing is expected to be in line with Policy 8b'. For Lea Castle Hospital Site (17/0205/OUTL) — 'it is accepted that provision is likely to be lower in the central part of the site'. This means little or no affordable housing. The Homes England Lea Castle Wider Site Plan shows Lower Density and Medium Density	The Wyre Forest Green Belt Review cannot be considered independent because of AMEC Foster Wheeler's conflict of interest. The Green Belt Review needs to be subject to review by an independent body. Green Belt boundaries should be only altered where exceptional circumstances are fully evidenced and justified. WFDC have not shown exceptional circumstances and need to prove this. Wyre Forest Council cannot treat different settlements within the Green Belt differently. Wolverley, Cookley and Caunsall should be treated the same with regards to Green Belt legislation. The consultation for Wyre Forest Local Plan should begin again so that all homes in the Wyre Forest can be informed of consultation meetings.	No	

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							homes only, without any area of Higher Density or Affordable Homes identified on this plan at all. Where are the 25% affordable homes going to be built? That's 350 homes of the 1400. Wyre Forest District Council has failed in their duty to co-operate. As a Parish Councillor I have spoken to a large number of Parishioners who did not receive any leaflet informing them about the Local Plan Consultation Meetings.			
Cutler Susan	LPPS552	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	As a Cookley resident I have not received any form of notification about this proposed building site, this proposal has all been rushed through with no consultation with any local people we have not had the opportunity to have our voice heard over this development. The local authority declared this site as Green Belt for a reason. At the time they must have felt that: To check the unrestricted sprawl of large built-up areas To prevent neighbouring towns from merging into one another To assist in safeguarding the countryside from encroachment was a good enough reason to protect our countryside for our next generation I also believe this development will increase the issues we have with the lack of transport, health and education infrastructure in the surrounding area.	I feel the review of Green Belt site needs to be carried out again with an independent body, to ensure this site is fit for purpose, which I feel it is not. I have not seen any plans for any amenities to be added to the site which means our local schools that currently are close to capacity will be under more pressure. Also the doctors surgery which once again is hard to get appointments will be even more over crowded. Focusing on the transport links, the local labour market with Wyre F only having 0.64 jobs per person against a UK average of 0.84 which in my view suggests that the Wyre forest isn't the place to build new houses as the jobs aren't in the Wyre Forest. Any additional population would be travelling out of the area but the transport links cannot sustain this. I feel all of the above make this proposed site unsound for the local area.	No	
Adams Giovanna	LPPS554	Policy 31	Yes	No	No	Positively Prepared Justified Effective Consistent with National Policy	The assessed needs of the area through the housing survey showed we need retirement homes and FTB houses. Not a party social upper class housing estate. The infrastructure of the village cannot support the needs of a huge housing development. My major concern is the road network the new houses would use is not able to cope with existing needs. Very recently a driver was killed at the junction of Castle Road and Wolverhampton Road. Extra pressure on road network will only increase the problem and fatalities. No brainer - don't build.			
Bickford Tim	LPPS556	Policy 31	No	No	No	Justified Effective Consistent with	Already too much traffic on roads Road safety issues School children at risk due to excess traffic Will be willing to discuss points as mentioned in section 6.		Yes	Will be willing to discuss points as mentioned in section 6

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						National Policy				
Adams John	LPPS558	Policy 31	No	No	No	Positively Prepared	Duty to co-operate I have been to several planning meeting and there has not been anyone there from the highways to answer my concerns relating to what road improvements are going to be implemented for development. Sound Due to the nature of the roads surrounding the proposed development there would need to be major road alterations to make the roads safe i.e. A449 this is a notoriously dangerous section which has seen countless fatalities over the years from lea Castle gates down to and beyond the Caunsall crossroads, by just having traffic lights or roundabout to allow access or exit from development site would cause traffic to stack up on the blind bends further down towards the Island Pool which is a recipe for disaster especially the Axborough site. The Stourbridge site is another concern given this also being notorious black spot, so to allow access along that stretch would be totally inappropriate. There appears to be no plans to help alleviate the rush hour congestion that is already very bad travelling the A449, which I find incredulous considering it is one of the main corridors north avoiding the M5/M6. As a haulage contractor I am constantly reminded of my duty to reduce pollution, so given that there seems to be plans for any sort of relief/bypass near the site and already knowing how bad the congestion gets around the Broadwaters are it raises my concerns about what will happen to the air quality once the development has happened by adding in excess at 2400 extra vehicles to this problem. At the moment it is nearly impossible to get a doctors appointment in the surrounding areas due to the already high ratio of patients to Doctors and being told that by calling the development a village "might" be able to get grants to help finance a Doctors surgery is not very reassuring, nor is being told that there is no provision to increase the hospital capacities to help cope with the already struggling services. At the moment there is a proposal to provide so much light industrial units off the Stourbridge Road which also concerns me given that they will need to be serviced by heavy goods vehicles which again will be highly dangerous given the nature of that stretch of road. Another thing that concerns me is the development off Axborough Lane knowing that some of the main Elan to Birmingham water pipes run under part of the one proposed site. I find it incredible that this is being put forward	Improved road structure i.e. by pass/relief roads, extensive alterations to the A449. Its own Doctors. Provision for extra hospital capacity. Some provision to maintain air quality in surrounding areas i.e. maybe making it a car neutral area services only by public transport. Or maybe only electrical vehicle to be used by residents. Maybe the proposed number of houses could be reduced drastically and under new guide lines soon to be issued by the Government the fields could be used to plant trees to help protect the environment.	No	

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							considering how much damage can be caused if a rupture should occur as witnessed at Wolverley and the other side of Bewdley. I hope that my point of view and concerns help you make an informative decision on these matters.			
Campaign to Protect Rural England	LPPS560	Policy 31	No	No	Yes	Justified Effective Consistent with National Policy	We object to the development of Lea Castle East, West, and North. • This has an irreparably adverse impact on a valued landscape. • There has been no prior public consultation on Lea Castle West and North. • The development is unnecessary, because WFDC does not need to identify (and should not identify) sites for more than 5420 houses, less an allowance for windfalls. • Since Wyre Forest is not part of Greater Birmingham HMA, it should not be providing housing for Birmingham or skewing its allocations to encourage commuting to there. • A456 through Hagley is used to (or even above) its capacity and this will make traffic on it worse. • The Green Belt Assessment on which the release is based is flawed: see paper on this annexed to objection CPRE 6B.E.	Delete Lea Castle East, West and North	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Homes England	LPPS111	Policy 31	Yes	Yes	Yes		Homes England supports the allocation of Lea Castle Village as a new sustainable community, focussed around the brownfield former hospital site. Although currently within the Green Belt, it is clear that the Council needs to remove some sites from the Green Belt to deliver the overall housing needs of the District. The site has clear robust boundaries, being bounded by the A451 to the west, Axborough Lane to the north and the A449 to the west ensuring that it is contained within this area and does not merge with other settlements. The allocation is of an appropriate scale that can accommodate a mix of uses including a local centre and school, and that makes it viable to have a bus running through the site. This ensures that the overall impact of the development on surrounding facilities and services is minimised. Technical and environmental baseline work has been undertaken for the site and this demonstrates that there are no significant physical constraints to development. The land is within the ownership of a single landowner ensuring that there are no land assembly issues to delay development. Homes		Yes	As landowners of the Lea Castle Village Strategic Allocation, Homes England would like to have the opportunity to participate at the examination in support of the allocation.

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							England has set out its commitment to the site through the planning application for the central previously development part of the site. Homes England is in the process of selecting a development partner for this core part of the site and is committed to accelerating delivery of the site to ensure that much needed new homes can be delivered on site quickly. The technical work has informed the development of the concept masterplan that sets out a framework for how the site could be developed. Going forward, Homes England welcomes the opportunity to work with the Council and key local stakeholders to development the masterplan further to ensure that it is a well designed scheme that provides new facilities for new and existing residents in the area and that mitigates its highway impact appropriately. Homes England is responsible for increasing the number of new affordable and market homes that are built in England and helping to stimulate economic growth by using land and investment to attract private sector investment. This includes investing over £4 billion in building new homes, helping families and individuals to own or rent their own home.			
Woods Darrell	LPPS169	31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	This is a disproportionate amount of housing, as 600 houses have already been approved in the area and is way too excessive to have an additional 800 houses and is taking up too much Green Belt land, concentrated in one area. Although the plans suggest doctors, schools and shops this may not happen and if it does they will be built last and will put enormous pressure on Cookley facilities. There is lots of land in dis-used industrial areas of Kidderminster town which could be built on or converted to homes, will allow people to use existing infrastructure and bring life back into the town centre, which is much needed.	There is lots of land in dis-used industrial areas of Kidderminster town which could be built on or converted to homes, will allow people to use existing infrastructure and bring life back into the town centre, which is much needed.	No	
Churchill and Blakedown Parish Council	LPPS207	Policy 31 - Lea Castle					Lea Castle and other developments which will result in increased traffic through Churchill and Blakedown. The draft plan now presented does not take into account concerns expressed at the time of the original consultation and it does not include any consideration for highway infrastructure in terms of roads or public transport. The Parish Council has concerns regarding the sustainability of those projects, without the necessary infrastructure. The Parish Council does not object in principle to the house building proposals but has major concerns regarding traffic on the A456. How do commuters get from Lea Castle to the A456 and Blakedown Station? The Parish Council does not believe that one-track rural roads are suitable to take traffic from			

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							these developments. The increase in traffic from elsewhere coming through Blakedown needs to be considered. Once the traffic is on the A456, how are we going to get it out of Blakedown? There are currently major tailbacks on both the Birmingham and Worcester Roads at Hagley, perhaps some communication with Bromsgrove District Council might be beneficial. The Parish Council requests that its concern regarding lack of plans regarding major traffic infrastructure, especially in relation to transport, be noted and it requests input to future discussion on plans to alleviate the problems which will be caused by developments outside the Parish boundary.			
Lloyd John	LPPS238	Policy 31		No		Consistent with National Policy	The Lea Castle Village allocation is not considered to be deliverable for transport and highway reasons. Please refer to the technical note dated 14th December 2018; this identifies the fundamental issues and subsequent non-compliance with Section 9 of the NPPF.	Omission of the Lea Castle Village allocation and instead a greater dispersal of allocated accessible development. Alternatively, the allocation of a village in a more appropriate location.	No	
Thomas Paul	LPPS417	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	As a Cookley resident I have never received any form of notification about this proposed building site, this proposal has all been rushed through with no consultations with any local people we have not had the opportunity to have our voice heard over this housing estate. The local authority declared this site as Green Belt for a reason. At this time they must have felt that * To check the unrestricted sprawl of large built-up areas * to prevent neighbouring towns from merging into one another * To assist in safeguarding the countryside from encroachment was a good enough reason to protect our countryside for our next generation. I also believe this estate will increase the issues we have with the lack of transport infrastructure in and around Kidderminster which includes the A449 which currently a busy road and only recently had a fatal accident on the castle Road Junction.	I feel the review of the Green Belt site needs to be carried out again with an independent body, to ensure this site is fit for purpose, which I feel it isn't. I have not seen any plans for any amenities to be added to the site which means our local schools that currently are close to capacity will be under more pressure. Also the Doctors surgery which once again is hard to get appointments will be even more over-crowded. I feel all of the above makes this proposed site unsound for the local area.	No	
Oliver Kevin	LPPS419	Policy 31		No		Justified	I recognize the need for additional housing in Wyre Forest District and the Lea Castle area is an appropriate location. I also welcome the concept of a sustainable, cohesive, settlement with its own school, shops and other facilities. Without the integrated infrastructure, inappropriate pressures would be placed on the community and facilities of Cookley. I also welcome and support the "Principles of Development" (Policy 31,2), particularly with regard to provision of public open space and green infrastructure, enhanced woodland	I feel the local Plan should be modified by reducing the scale of the proposed Lea Castle Village development to a size which, whilst retaining the principle of a sustainable, cohesive, settlement with its own school, shops and other facilities, involves less Green Belt land take and preserves greater settlement separation and community	No	

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							screening and specifically the proposal that the development will be expected to provide 40% greenspace; this is particularly important given the loss of existing Green Belt. However, the scale of the proposed village has grown significantly since the Preferred Options Document (2017). As a result, the proposal creates a large settlement which effectively, and visually, establishes virtually one continuous urban settlement from Cookley and Caunsall to Kidderminster. The required loss of Green Belt is very disappointing given the purposes of Green Belt contained in national Planning Policy Gramework (Section 9 Para 80). The Council's own Green Belt Review (Part ii Site Analysis) confirms all identified site within the proposal as making a "significant contribution" or "contribution" to the Green Belt. The report concludes that for 2 of 3 sites "even modes development would have a disproportionate effect both on the function of the Green Belt (principally in terms of sprawl and effect on setting), but also on the wider perception of openness reflecting their prominence". I also have concerns about the additional traffic the development would generate with the associated noise, pollution, potential congestion and safety issues; the latter particularly given the dreadful accident history on the A449 adjacent to the proposed development. Information regarding future traffic volume and proposed vehicular access to the development site is limited and vague. Finally, whilst I recognize that no decision has been made regarding the name of the development, I would question whether "Lea Castle Village" would be appropriate. The historic Lea Castle was site some distance to the west of the proposed development.	identity. The Plan should provide further details of future road network provision. Given the impact of the development on traffic and the associated implications (as outlined in 6. above), an analysis of how this will be addressed, whether by construction of a relief road or by other traffic management proposals should be included. The Plan should suggest that other names for the development (other than "Lea Castle Village") will be considered. Existing names from within the site e.g. Axborough or Talbots Hill might be more appropriate; or something entirely new.		
Jolly Ian	LPPS425	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	• Not enough low cost housing. • Removing Green Belt status. • Over development for this area, insufficient support infrastructure - road access. • Not in line with planning line NPPF paragraph 136	Limit development to 'Brownfield' area i.e. hospital site, not surrounding green land. High proportion of affordable housing for local need. Independent review of the Wyre Forest Green Belt review.	No	
Phillips Joanna	LPPS427	Policy 31	No	No	No	Justified Effective	1. Green Belt policy - Green Belt land should only be used in exceptional need. Table 3.2 paragraph 6. This is not exceptional need. There are other brown field sites available.	Reduce the size of this development! it is a travesty.	No	

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							2. Amec Foster Wheeler did the strategic Green Belt review for Wyre Forest - acting on behalf of Homes England for the Lea Castle site. This is not only morally wrong but a conflict of interests. 3. There is currently a drive to reduce emissions - how can this plan be viable when creating 1400 homes will add at least 1.5 cars per household who will add masses of traffic to existing busy roads A449/A451. 4. How can the local representatives have already voted for this before it has been pre-determined. 5. We did not receive any information through the post regarding the consultation - many people are unaware of the plan.			
Laud Ben	LPPS444	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	I have had no notification regarding any consultation about the plans.	The number of houses is too many by far and will put too much stain on roads etc. Local labour market in Wyre forest is 0.64 jobs per person, lower than national average. With less employment in the area, it will mean more travel from new homes. This will therefore put too much pressure on transport systems, like the busy A449.	Yes	I feel that the concerns of local people who understand the area are being ignored. Less homes built on the site would not put as much stain on local roads, schools etc. If feels like the housing developers are being greedy and its all about profit.
Cook Peter	LPPS450	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	No communications to notify of the consultations This is not needed in this local area Conflict of interest re Amec Foster Wheeler	The road network will not be able to deal with additions - it is already too busy and dangerous No infrastructure guarantee Green Belt review needs to be carried out again by an independent Does not comply with government regs/requirement for 30% affordable housing	No	
Jones David	LPPS460	Policy 31	No	No	No	Positively Prepared Justified Effective	1. No demonstrated need for 800 houses on Green Belt. 2. Road infrastructure will not be able to cope. 3. Unjustified removal of Green Belt. 4. Reduced social/affordable housing for plan Wyre Forest people require greater percentage than 25% Policy and Para 8.3 5. Disproportionate distribution of housing at odds with	Utilisation of existing brown field and disused industrial sites in Kidderminster Town for housing. Industrial sites will not return to use. Increasing population will regenerate extremely depressed surroundings to the benefit of all residents of Wyre Forest.	Yes	Because I am against any construction on the Green Belt and unnecessary and unjustified.

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							location of WFDC dedicated employment area.			
Wood Mary	LPPS468	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Amec Foster Wheeler did strategic Green Belt review for Wyre forest and act on behalf of Homes England: Lea Castle ... conflict of interest. Building on Green Belt should only be considered in case of exceptional need. Not environmentally friendly. Traffic congestion and pollution. Two local reps have already voted in favour yet consultation has not yet closed. Information re consultation vent was not received. Below government recommendation for affordable housing.	Green Belt review should be undertaken by an independent body. Needs to comply with Government regulations re 30% affordable housing.	Yes	Strong view in the village of Cookley to building on Green Belt site.
Huxtable Amanda	LPPS471	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	1. The majority of residents did not receive any hard copy information on consultative meetings to be held in November, only those with access to Facebook and other social media sites were informed. 2. We have a moral responsibility to protect areas designated as Green Belt area, that is precisely why it is called Green Belt! 3. Regeneration of Kidderminster should be given priority, Brown field sites should be regenerated with housing etc. Regeneration is proven to work from an inner core working outwards not the other way. 4. We need to minimise our reliance on the car and encourage the design or more walkable cities - ones that the high streets imagined by Mary Portas would benefit from, and which could begin to arrest the slide into obesity and diabetes it seems we are on.ing etc. Regeneration is proven to work from an inner core working outwards not the other way (http://theconversation.com/brownfield). 5. Green Belt land is there to stop Towns and Villages merging. The only barrier to mergence is A449. Not Green Belt land as designed by GOV.UK 6. The Green Belt serves to preserve the setting and special character of a town. 7. The Green Belt assists in urban regeneration by encouraging the recycling of derelict and other urban land.	• Non compliance occurs where there is insufficient social housing. There should be 30% of SH on this site but we are told that as there are increased costs this will be limited to 25%. • No provision for single person accommodation or starter homes. • Light warehousing industrial units not supporting adequate employments. • Provide much needed affordable housing. • Only replace current buildings with building for same use. • Replace with outdoor sport facility or recreation facility.	Yes	I am a reasonably articulate woman and feel that I may demonstrate the Misguidance of the Planning department and councillor supporting this proposal. I also cannot put all my issues onto this electronic document as it only allows 4 comments per section!
Phillips Ian	LPPS473	Policy 31	No	No	No	Justified Effective Consistent with	1. Under Green Belt policy - Green Belt land should only be used in exceptional need. This is not exceptional need. Housing questionnaire needed - single occupancy dwellings, homes for old people and affordable housing not big executive	Please think what this will do to Cookley - there has to be a reduction in the size of the development.	No	

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						National Policy	homes. 2. Reducing emissions - how does this fit with plan to reduce emissions - everyone will drive from this site to work, schools, shops etc. This is no 'green'. 3. Conflict of interest? Amex Foster Wheeler did the strategic Green Belt review of Lea Castle, acting on behalf of Homes England - morally wrong? 4. No literature was received regarding consultation through the post - local people do not know what is happening. 5. Local representatives have already voted on this before. It has been pre-determined - how can this be right, they are meant to be working on behalf of local people who are very much ill informed and against it.			
Bass Deborah Alison	LPPS475	Policy 31					I have lived in this village all of my life, I was actually born in this village. I would like to keep this village. I think this will make this into a town and I don't think this will help the school and doctors and aid more traffic on the Wolverhampton Road as this is already difficult to pull out on as it already is! NPPF (para 136) Green Belt boundaries should only be altered in exceptional circumstances Wyre haven't proved this!	Wyre Forest must follow regulations for Green Belt.	No	
Wills Grant	LPPS477	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The use of the surrounding Green Belt land/field in addition to the former hospital site. NPPF clearly states that the use of Green Belt land should be used/altered in exceptional circumstances. There is no justification for the use of these fields and the Authority cannot justify it when other brownfield sites exist and are not explored. There is little or no plan for local infrastructure or budget identified to improve infrastructure.	There has been no consideration (if the demand exactly exists for housing) to provide its housing through multiple other sites in the local area. This has been progressed on a lazy and convenient solution to expand around the original Lea Castle scheme. The Lea Castle site should be of a suitable size on the original footprint, and other sites explored/used.	No	
Shakespeare Joseph	LPPS481	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Not enough notification given and poor use of the brownfield sites in the area being used first. It appears to be just for monetary gain without thought to affordable housing.		No	
Tibbetts	LPPS487	Policy 31	No	No	No	Positively	Not what is required in the local area. Conflict of interest i.e.	Dangerous A449, busy junctions already.	Yes	There is no need for

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 31: LEA CASTLE VILLAGE

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Christopher						Prepared Justified Effective Consistent with National Policy	Amec Foster Wheeler who carried out a Wyre Forest Review in 2016 and 2017 and have been advising Homes England since 2017.	Needs to affordable at lease 30% not 20% as it stands at the moment. Grenbelt review to be carried out again with an independent body. no new infrastructure guarantees. Cookley will be overloaded.		the development. Will not regenerate the main town.
Branson Susan	LPPS494	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	I do not consider the local plan to be legally compliant due to the fact that there was a covenant on Lea Castle stating that build should take place only on the existing build footprint. Also protected species on site include dormice, badges, grass snake, adders, barn owls, tree creepers and thrushes. There are also otters in the river Stour in Cookley.	By building on Lea Castle footprint only and not the Green Belt land. 600 houses is quite adequate for the area. 1400 houses will be far too many for the area to cope with 2000 plus more cars to add to the already busy road network in rush hour. Building 1400 houses will mean the people of Cookley and Caunsall and surrounding villages with their amenity greatly harmed.	No	
Painter Ann-Louise	LPPS503	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The houses planned are not affordable for the families of Cookley. There are many empty residential and commercial properties located within Kidderminster that can be made habitable. The local infrastructure, roads, doctors and school cannot cope as it is. 7.7 NPPF Para 136 GB boundaries should only be altered when exceptional circumstances are fully justified.	I don't mind and would like to see the existing buildings on Lea Castle removed and existing footprints for buildings built on. The space utilised on the sugar beet used, along side properties and grounds on Mill Lane, Kidderminster used. The use of brownfield sites must be used prior to Green Belt.	Yes	I feel very heartfelt about the use of our beautiful Green Belt being taken away. I am from a major UK city and moved here for the rural position and to be near family. My son had to fight for his place at Cookley School which is over subscribed as it is, I want him to be able to get an affordable house in the village when he needs.
Hooper Emily	LPPS516	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Building on existing Lea Castle Hospital site acceptable. Strongly object to extra 800 houses on Green Belt and beautiful farming land. NPPF (para 13b) GB boundaries should only be altered where exceptional circumstances are fully evidenced and justified and I do not believe Wyre Forest have done this	National legislation should be followed and until then such a large development on Green Belt land is NOT justified. Plenty of alternative non-Green Belt land suitable around Wyre Forest.	No	
Fallon Sally	LPPS519	Policy 31	No	No	No	Positively Prepared Justified	Not legally compliant as we did not receive a leaflet re the presentation days. Many didn't attend as didn't know anything about it. Also a conflict of interest re Amec Foster Wheeler	Green Belt review should be done again by an independent consultant. There needs to be transparent justification for building on green	No	

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						Effective Consistent with National Policy	who carried out the Green Belt review in 16 and 17 and then advised Homes England on the way forward for their plan to build homes on their land. It is not justified as they haven't justified building on Green Belt land (NPPF) para 136 states Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The whole site seems to have been moved from the original proposal to the field alongside the A449 (not in proposal) It also fails to comply with the amount of affordable housing in line with Policy 31.1 (8b)	field without affecting the integrity of neighbouring villages. The proposal is not as was presented in the original and needs to be represented with the proper notification. This seems to be a 'fait a complis'. There needs to be the appropriate amount of affordable housing re national guidelines.		
Southam William	LPPS526	Policy 31	No	No	No		It is my understanding that the land in question was only sold to the NHS originally with the condition attached that if ever the hospital was demolished only the hospital footprint could be built on. Therefore extra housing is not legally compliance and also goes against statement that Green Belt will only be used when absolutely necessary as it is obvious these houses are not for locals but are to attract affluent outsiders that means it is not necessary. It is not a sound plan because the road infrastructure cannot be improved on to get into Kidderminster would mean going along roads that cannot be widened and the journey at peak times is already a nightmare. I hate to think what the hundreds of additional cars would create. Also neither of the local rail services could cope with an influx of cars to park. Seventy extra spaces at Blakedown couldn't cope especially if the other adjacent roads are going to have yellow lines. It would also make Wagon Lane a rat run. Also local trains to Birmingham are already crowded as are the roads.	Keep to the original plan of building on the existing hospital footprint (max 400-600 houses) of a type that are affordable and needed by residents of Wyre Forest and not of a type to attract rich outside higher rate payers as this plan is obviously intended to attract. NEED NOT GREED	No	
Harris Paul	LPPS530	Policy 31	No	No	No	Positively Prepared Consistent with National Policy	There are two main reasons why the local plan is unsound. Firstly there is a conflict of interest with regard to the promotion of the additional Green Belt land surrounding Lea Castle over other more suitable sites within Kidderminster. The Green Belt review was undertaken by Amec Foster Wheeler who are also the agents acting for Homes England on the Lea Castle site - therefore it is obviously in AFW's best interests to increase the boundary limits on land that they are involved with compared to other sites within the district. Why else would the land adjoining existing residential areas e.g. Stourbridge and Birmingham Road sites be ignored in favour of land that has no obvious connection to existing residential area - land along the Wolverhampton and Stourbridge Roads (The Lea Castle site is screen from these roads by heavy tree planting) this having more of an impact on the Green Belt. The second reason is that it would appear that the Council have not taken account of the concerns attached to the	The sites currently located for residential development surrounding the Lea Castle site should be removed in favour of sites with less impact on the Green Belt, e.g. Stourbridge Road and Birmingham Road. The Council will need to produce a revised OAN once the outcome of the Government's consultation is known and will also need to revisit their minimum housing need figures when the above findings have been published and the revised Draft Local Plan should be subject to a complete public reconsultation.	No	

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							standardised methodology of the 2016 household projections by Central Government. The Council should have been aware of the review being undertaken by Central Government.			
Seagrave Stacey	LPPS533	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Apparent conflict of interest between A F Wheeler who carried out WF review in 2016 and 2017 who then also has been advising Homes England since 2017. Very little information and notification for consultation if any at all	Major reconsideration to traffic and road infrastructure needs on A449 and surrounding country roads/lanes that will have a huge influx of traffic. Green Belt review, why not stick to Lea Castle Hospital Grounds, why need to destroy out Green Belt land that surrounds it. Schools/Doctors/Shops - need guarantee's that these will be included - and not in the final stages of development.	Yes	Very happy to verbally illustrate my concerns
Harrison Christine	LPPS535	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	I did not receive leaflet informing me of all this through my door. Amex Foster Wheeler did the Green Belt review for Wyre forest Council in 2017 at the same time they were consultants for Homes England. (Conflict of interest).	I should have been given the chance to attend meetings. The Green Belt review needs to be redone or reviewed by someone who is an independent consultant.	No	
Bickford Gail	LPPS537	Policy 31	No	No	No	Justified Effective Consistent with National Policy	The current road infrastructure will be unable to cope with the extra capacity of traffic. Vehicles already use the lanes as short cuts, travelling at unsuitable speeds making it sometimes dangerous travelling down the lanes. It is already difficult getting in and out of the car outside our cottages. Schools, GP surgeries are already oversubscribed.		No	
Caseley Rosalinda	LPPS539	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	1. Local infrastructure in Cookley already overloaded and unable to handle Lea Castle hospital development, plan does not provide school/doctor expansion until hundreds of new houses have been sold. 2. Local people priced out of Lea Castle development with some houses £1 million + 3. A449 - Regular accidents/facilities. Cannot handle thousands of extra cars. 4. Greenfield there for a reason. Should not be built on. 5. Poor communication from WFDC for residents, especially those not online.	Face clarification of legal/planning terms and process. Online documents confusing - more confused after trying to read them. Only told about consultation by word of mouth. WFDC negligent in duty to properly appraise residents of situation.	Yes	I would like someone to explain in plain English points pertaining to 4.1 and 4.2 (page 2 of this document).
Banks Nick	LPPS541	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with	As a Cookley resident I have not received any form of notification about this proposed building site, this proposal has all been rushed through with no consultation with any local people we have not had the opportunity to have our voice heard over this development. The local authority declared this site as Green Belt for a reason. At the time they must have felt	I feel the review of Green Belt site needs to be carried out again with an independent body, to ensure this site it fir for purpose, which I feel it is not. I have not seen any plans for amenities to be added to the site which means our local schools that currently are close to	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						National Policy	that: • To check the unrestricted sprawl of large built up areas. • To prevent neighbouring towns from merging into one another • To assist in safeguarding the countryside from encroachment was a good enough reason to protect our countryside for our next generation. I also believe this development will increase the issues we have with the lack of transport, health and education infrastructure in the surrounding area.	capacity will be under more pressure. Also the doctors surgery which once again is hard to get appointments will be even more over crowded. Focusing on the transport links, the local labour market with Wyre F only having 0.64 jobs per person against a UK average of 0.84 which in my view suggests that the Wyre Forest isn't the place to build new houses as the jobs aren't in the Wyre Forest. Any additional population would be travelling out of the area but the transport links cannot sustain this. I feel all of the above make this proposed site unsound for the local area.		
Laud Jade	LPPS542	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	* We received no letter of consultation * It does not meet the need of the local area * Concerned about Amec Foster Wheeler who may have a conflict of interest (while advising Homes England since 2017) who did the Wyre Forest Review	* An independent body needs to carry out Green Belt review * A449 is a busy road and needs to have junctions reviewed * Needs to comply with Governments aim of 30% affordable homes - this one is 20% * Needs to look at the overload of infrastructure to area	Yes	To explain my conservation concerns of Green Belt and the lack of understanding area infrastructure. Homes need to be affordable for all and brown field sites used even if they are not the most financially rewarding for big companies.
Jones Joanne	LPPS544	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Regarding Lea Castle Plan: * 200 houses our of 1400 houses which are designated as affordable housing is not in keeping with national policy - should be 25% (policy 8b) * The Green Belt should be preserved - paragraph 7.7 of the local plan (P51). There is no evidence for the Green Belt to be built on. Once it is lost it will never be retrieved. This will have an adverse impact on the local community. * There has been poor consideration of the road network. This is a safety risk. * This was not included on original local plan * "Cross roads fields to The Crescent" inadequate communication and consultation I would like to comment that this paperwork is not easy to understand in order to make an appropriate response. This has been poorly conceived.	Do not build on Green Belt land - as the housing need in the Wyre Forest does not justify exceptional need. The Green Belt should be reviewed independently before any decisions about building on it are made. Amec were not an independent consultant	No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 31: LEA CASTLE VILLAGE

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Hall B	LPPS546	Policy 31	No	No	No	Consistent with National Policy	The consultants employed by the developers - Homes England - are Amec. The same company who were employed to produce Green Belt review. I feel this would not be an unbiased revue. Development in this area would use large amounts of Green Belt land. Other areas should be considered. The impact on Cookley would be a disaster. Roads, schools, Dr's shops all insufficient.		No	
Hartill Matt	LPPS549	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	How can residents answer of the plan is legally compliant? We are not legally trained in planning law and procedure. Only three boxes to tick how can residents express their viewpoint? Original plan for the Lea Castle site was for 600 homes now it is 1600 homes!! It is a planning and environmental disaster based on population growth figures not relevant to Wyre Forest. I attended the drop in session at Cookley Village Hall, I questioned many of the official representative present about the Lea Castle development. They could not answer many of the questions posed by myself and other residents. They gave vague answers to many of the important questions, in particular with regard to schools, highways and Green Belt. Many, many homes did not receive the official leaflet informing them about the consultation (not everyone uses social media). Not legally compliant. This is quite frankly absurd to expect ordinary people to be able to command on this in any meaningful way. This form, is designed in a way that will exclude the population from commenting constructively about development that will affect their way of life for generations. The whole plan is not legally compliant, the population was not properly informed. The experts at the meetings could not answer questions correctly. The whole plan is against every environmental strategy, locally. Minimal affordable housing Detrimentally affects the existing population of Wyre Forest.			
Mathews Joyce	LPPS551	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	There is insufficient affordable housing (Policy 8b). The National Policy Framework Paragraph 136 states categorically that Green Belt should not be altered - there is absolutely no justification for it. All roads will not cope - neither will local amenities!!! There appears to be a conflict of interest because the Green Belt review was produced by Amec 2016 and 2017 and from 2017 they are consultants to Homes England. THIS SHOULD NEVER BE!!!!	Surely the Green Belt review should be started anew with independent consultants. As the case for exceptional need for housing - Wyre Forest has not been met - There is absolutely no justification for building on the Green Belt. No development should take place without the 25% affordable housing being met. This is not the case on the original Lea Castle site.	No	
Wrigley Richard	LPPS553	Policy 31	No	No	No	Justified Effective	I was not informed until after the consultation had taken place. It will destroy wildlife and habitat whilst increasing		No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Consistent with National Policy	pollution (section 31.3, para 2.3) Policy 8b does not meet these specifications or national guidelines on affordable housing. We were not notified of the consultation meetings until after they had taken place			
Cutler Mike	LPPS555	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	As a Cookley resident I have not received any form of notification about this proposed building site, this proposal has all been rushed through with no consultation with any local people we have not had the opportunity to have our voice heard over this development. The local authority declared this site as Green Belt for a reason. At the time they must have felt that: To check the unrestricted sprawl of large built-up areas To prevent neighbouring towns from merging into one another To assist in safeguarding the countryside from encroachment was a good enough reason to protect our countryside for our next generation I also believe this development will increase the issues we have with the lack of transport, health and education infrastructure in the surrounding area.	I feel the review of Green Belt site needs to be carried out again with an independent body, to ensure this site is fit for purpose, which I feel it is not. I have not seen any plans for any amenities to be added to the site which means our local schools that currently are close to capacity will be under more pressure. Also the doctors surgery which once again is hard to get appointments will be even more over crowded. Focusing on the transport links, the local labour market with Wyre F only having 0.64 jobs per person against a UK average of 0.84 which in my view suggests that the Wyre forest isn't the place to build new houses as the jobs aren't in the Wyre Forest. Any additional population would be travelling out of the area but the transport links cannot sustain this. I feel all of the above make this proposed site unsound for the local area.	No	
Hall Philip	LPPS557	Policy 31	No	No	No	Consistent with National Policy	I feel there is no justification for the use of Green Belt land. The National Policy Framework states that this should not be altered (paragraph 136). My concern is regarding the size of this development and the problems it would cause in our area and village of Cookley. Lack of local amenities (schools, shops, doctors) also the infrastructure. Would cause chaos mostly on our roads. The other concern is that the consultants who produced the Green Belt review were Amec 2016 - 2017. Since 2017 they are now being employed by the developers Homes England. I feel that this would be an unbiased review.		No	
Cox Jo	LPPS559	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National	AMEC Foster Wheeler carried out the Green Belt Review in 2016 and 2017. They have advised Home England on Lea Castle since 2016. Is this a conflict of interest? 7.7 & NPPF paragraph 136 Green Belt boundaries should be only altered where exceptional circumstances are fully evidenced and justified. Wyre Forest has not done this. Policy 31.1 Lea Castle Village Vision Paragraph I — 'Affordable	The Wyre Forest Green Belt Review cannot be considered independent because of AMEC Foster Wheeler's conflict of interest. The Green Belt Review needs to be reviewed. Green Belt boundaries should be only altered where exceptional circumstances are fully	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Policy	housing is expected to be in line with Policy 8b'. For Lea Castle Hospital Site (1 7/0205/OUTL) — 'it is accepted that provision is likely to be lower in the central part of the site'. This means they are deliberately reducing affordable housing. The Homes England Lea Castle Wider Site Plan shows Lower Density and Medium Density homes, without any area of Affordable Homes identified on this plan at all. WFDC have no intention of providing 25% affordable housing out of the 1400 homes in Lea Castle 'Village' (housing estate). I did not receive an information leaflet telling me about the Local Plan Consultation.	evidenced and justified. WFDC have not shown exceptional circumstances and need to do so. Exceptional circumstances do not exist in this case. Wyre Forest District Council cannot treat different villages within the Green Belt differently. Wolverley, Cookley and Caunsall should be treated the same under national legislation NPPR paragraph 36. The consultation for Wyre Forest Local Plan should begin again so that all homes in the area know about the consultation meetings.		
Mcgovern Angela	LPPS658	Policy 31		No	No	Effective	I object to all plans due to the large scales of the developments. May main objection is based on the Lea Castle Village proposal. We are already dealing with high volume of traffic along the A449. The extra development is going to cause more traffic and noise pollution which will have a major impact to our small community. The development will change the character of the area. The roads are not able to cope with more traffic going through Kidderminster ad the surrounding areas. I believe that this development is not planning for the benefit of the local people. The new Lea Castle Village will also damage the wildlife in the area. The footpath along Chestnut Wood will be damaged by the increased volume of population in this new village. We should be protecting the woods and damaging them.	• Reduce the number houses to be built in each area • Review the locations of the plans to make it more even across the county • Carefully consider the short and long-term impact of each building to the local community rather than the benefits of the build to bring more people in from the city. • Build in brown field land and improve existing derelict buildings rather than exploring areas that are classed under Green Belt.	No	
Parry Andrew	LPPS698	Policy 31	No	No	No	Positively Prepared Justified	1. Whilst I am not totally opposed to the development of the Lea Castle Site, I have yet to see evidence that this is the best site from a list of properly researched options. I t comes across as just being "it seemed a good idea at the time". 2. I received no notice of the consultation. 3. I am not convinced enough thought has been given to implications for infrastructure - road access, facilities etc	Properly research and publish other options. Especially those that would use brownfield sites. Also to provide reassurance that new houses will be "life-time friendly" and DDA compliant Also to provide assurance that the new houses will be affordable to all Also to provide assurance that the infrastructure need will dove-tail with the build programme, not added as an afterthought.	No	
Pre-submission Anonymous	LPPS939	Policy 31					I would like to lodge my concerns regarding the proposed Lea Castle site. I strongly oppose the building of 1400 houses due			

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							to the following reasons: • I did support the original proposal to build 600 houses on the brownfield site BUT: • I oppose the illegal building on Green Belt - There are no 'exceptional circumstances' to warrant the additional 800 houses • The estate will effectively join up the historic village of Cookley with Kidderminster - The Green Belt land is there to protect the separate heritage of the village • There has been little thought to infrastructure surrounding this site - The A449 is an extremely busy and dangerous road with several serious accidents including a fatality this year - The new development could bring up to 3000 additional cars onto this road, but no measures have been provided for traffic calming or any consideration as to how the road will be crossed for residents wishing to move between villages on foot • The proposal for industrial units is not in keeping with the local rural environment - Similar units in rural locations around Kidderminster have remained empty for lengthy periods of time, showing there is no urgent requirement for units of this type • The proposed houses are not for local people. A smaller number of smaller houses would be more appropriate for this site if the true intention was to house the local community • I am concerned that there is only a 'proposal' to provide schools and doctors. We have no assurances this will happen and if these do not go ahead then the local facilities will be swamped. With 600 houses you would not need to build additional facilities as existing schools and doctors could absorb the new families • There have been many reports of large out of town housing estates creating communities that are cut-off. Due to the lack of public transport, all families living on the new estate will need to drive and this will significantly increase emissions with a large environmental impact for the area • Furthermore, many people within the village were not given notice by the council of the consultation process and the process has not been easy to oppose Unfortunately as I do not have a degree in Law I am unable to work with your diabolical complaints form! Not only do I not understand the deliberately confusing terminology, the			

<table>
<tr><th>Respondent</th><th>Response No.</th><th>Part of Document</th><th>Legally Compliant?</th><th>Sound?</th><th>DTC?</th><th>Reasons for being unsound</th><th>Summary of Response</th><th>Suggested Modifications</th><th>Attend Oral Examination?</th><th>Reason for Attending</th></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>formatting of the Microsoft Word document is appalling and will not let me comment within the appropriate spacing. I have a degree and am not able to operate it, so I can only imagine how difficult this has been for the older people who live in Cookley Village! I would kindly ask you to take my comments and those of other villagers into consideration with or without the legalese of the form. I would also ask you to consider simplifying your consultation process in future.</td><td></td><td></td><td></td></tr>
<tr><td>Severn Trent Water Ltd</td><td>LPPS1054</td><td>Policy 31</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Positively Prepared</td><td>We would like to draw your attention to the High and Medium risk sites which we would be keen to discuss further to understand likelihood and growth trajectories.
<table>
<tr><td>WFR/WC/15

WFR/WC/32

WFR/WC/33</td><td>LEA CASTLE – FULL SITE</td><td>There are known capacity issues downstream of this site. We are in discussions with the developer regarding the drainage strategy for this site and required capacity upgrades.</td><td>Medium Risk</td></tr>
</table></td><td></td><td>No</td><td></td></tr>
<tr><td>Brudenell- Pryke Penelope</td><td>LPPS88</td><td>31</td><td>Yes</td><td>No</td><td>Yes</td><td>Positively Prepared Effective</td><td>This development of a new village offers the opportunity to build something renowned nationally by making the village as eco-friendly as possible.

The minimum requirements for sustainable development will probably not be good enough in 20 years’ time, so we should be thinking about the next step. The recent lessons learned by Wyre Forest House and the Wyre Forest Leisure centre should have taught us this. Plans should be made now to build energy efficient and renewable solutions into ALL new builds, whether for business or residential use. These should include in-built solar panels, battery storage and waste water heat recovery wherever possible, as well as grey water harvesting and re-use.

In addition, more “joined-up” thinking is required for large developments. If properties need heat, is there a local district heating network or a business that is generating heat and not re-using it? If a new business development is planned, will it generate waste heat, and if so where will it be used? If not on-</td><td>Please see comments in previous sections.</td><td>No</td><td></td></tr>
</table>

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							site, is there, or could there be a district heating network? Community initiatives which bring together old and young residents in a common cause have been shown to be very effective in benefitting all concerned. Encouragement and enablement for this should be considered when planning new communities, such as Lea Castle.			
Hibble Gillian	LPPS137	Table 3.2 paragraph 6	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	AMEC FOSTER WHEELER have a vested interest. The land is Strategic Green Belt so therefore this is a conflict of interest and is morally wrong. There is non compliance with Homes England as there will not be enough percentage of single occupancy homes or starter homes built. Increased emissions from vehicles for 1400 new homes with no planned changes to the existing A449. No plans for new schools, doctors' surgery to support the extra number of people who will be living in the area. This form has been difficult to complete with the expectation that the ordinary lay person would have knowledge of completing without knowing all rules and regulations. Finally leaflets informing villagers of this process of consultation were not delivered!			
Little Anna	LPPS175	Chapter 31 and 32	Yes	Yes	Yes		The revised Local Plan has considered the technically valuable comments put forward in the previous consultation and has identified the most sustainable locations for housing and employment development. I support the proposed development sites put forward. The development of Lea Castle Village is a logical use of a brownfield development site that can be developed into a community with supporting facilities. The site is also located off the main road and could be easily accessed by public transport. The site is well-bounded by two main roads and a local road which could form a natural boundary to the development site. Furthermore, the development at Kidderminster East, the Land East of Offmore (OC/6) and Land at Stone Hill North (OC/13N) (and OC/11 and OC/12), is supported. With appropriate transport improvements in place, the development could be		No	

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							accessed by the A456 and A448. The sites are located in close proximity to the main roads and public transport services (buses) could easily divert to serve a community. Housing within OC/13N, although mixed-use, would be in a reasonable travel distance for access to Kidderminster Station. Locating development in this area could mitigate any additional impacts that could arise from additional housing in the district and increased pressure on the car park at the rail station. The development also rounds off the eastern boundary of Kidderminster. Use of brownfield sites is also supported.			
Hagley Parish Council	LPPS216	Policy 31	Yes	No	Yes	Justified Consistent with National Policy	We oppose Lea Castle East, West and North: * On strategic grounds, that the development should be on other sides of Kidderminster: * Because this includes some grade 2 farm land, which ought to be kept growing food (according to Plan Policy 28D). * It is unnecessary: WFDC is allocating more land for development than it needs to and can show no "Exceptional circumstances" for doing so. This point is developed more fully as an objection to Policy 6A annex on quantum. * Because of their landscape impact (see NPPF para. 170), particularly on the tract of open countryside on either side of A451 between Axborough crossroads and Park Gate Inn (for Lea Castle East) and as viewed from Wolverley Road (for Lea Castle West). * Because the use of the site (particularly Lea Castle West) removes the strategic gap between Kidderminster and Cookley, leading to the virtual coalesce of Kidderminster and Cookley via Lea Castle, (cont under 7) contrary to at least 2 of the 5 purposes of Green Belt.	Delete Lea Castle East, West, and North sites, with consequential amendments Policy 31.2 paragraph 14 does not seem to make sense and should be redrafted to make its meaning clear.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument
Clarke Stephen	LPPS244	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	I do not consider the Local Plan to be legally compliant due to the fact that there was a covenant on Lea Castle stating that build should take place only on the existing build footprint. Also protected species on site include Dormice, Badgers, Grass Snakes, Adders, Barn Owls, Tree Creepers and Thrushes. There are also otters in the River Stour in Cookley.	By building on Lea Castle footprint only and not the Green Belt land, 600 houses is quite adequate for the area. 1400 will be far too many for the area to cope with, 2000 plus more cars to add to the already busy road network in rush hour. Building 1400 houses will mean the people of Cookley, Caunsall and surrounding villages will have their amenity greatly harmed.	No	
Biggs Yolande	LPPS418	Policy 31	Yes			Justified Consistent with National Policy	The plan does not seek to meet the local needs for housing, community facilities, infrastructure for transport, education and doctors. The village of Cookley recently had a housing needs survey, it requires 159 houses. The Crescent, adjacent to the Lea Castle site is part of Cookley. The area of Lea Castle	Exceptional circumstances necessitating use of Green Belt have not been given. Not in line with local needs. Cookley is a village surrounded by Green Belt, no requirement for 1400 homes in this area and no infrastructure	No	

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							is wholly included within the area designated for Cookley and Caunsalls neighbourhood plan. This plan isn't justified. It has not been prepared with participation of the community, many villagers objected to the original 600 houses due to lack of infrastructure. This has been ignored and replaced with an additional 800 houses? There is no implementation plan, showing how and when the roads and schools will be built/improved. Current roads cannot cope with any increase in traffic volumes, regular jams leading to poor air quality, increased accidents and delays. Green Belt boundaries should be altered only in 'exceptional circumstances' and after all other reasonable options for meeting housing need have been examined fully. The housing requirement numbers for Wyre Forest are highly ambitious and well above recent trends of actual house building. There is no prospect of there being the kind of public investment in housing that would enable these requirements to be met any time in the future. Housing demand alone isn't a reason to change Green Belt boundaries and the many brownfield sites and empty factories and offices in Kidderminster should be used before one blade of Green Belt is built on. Not consistent with National Policy - Policy 7.7 and NPPF (paragraph 36) Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. The road infrastructure cannot support additional traffic. The route into Kidderminster or through the lanes to Hurcott or Churchill cannot be made wider or expanded to deal with increased volumes. I am of the belief that when Lea Caste hospital was built in the Green Belt, part of the agreement for it being built was that any subsequent development would not be allowed to exceed its original footprint. Why is this stipulation being ignored? How can it be correct that the Company that is the agent for the owners of Lea Castle i.e. Amec Foster Wheeler are the same company that have advised WFDC on suitable sites? Surely a massive conflict of interest?	to support them		
Pannell Katrina	LPPS420	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	I was not notified of the consultation the development does not meet the needs of the local area in terms of size of development, amenities provided, upgrading of existing transport links (in particular rail services, given that due to the location, it is unlikely that residents will find local employment. I understand that there is a conflict of interest due to the advisors to WFDC have also been advising Homes England.	No development of greenfield land is to be undertaken until such time as brownfield sites have been fully developed. The development should be located close to transport links for reasons of sustainable living. The council's own transport plan highlights the routes from this development in	No	

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							Development of the Green Belt land should not be considered until brownfield sites have been fully developed. The siting of a development of this scale should consider local transport links. There is not sufficient capacity within the local road network or rail networks to support a development of this size.	Kidderminster town centre as already being areas of high pollution. The size of development should reflect the housing needs of the district.		
Dunphy Joseph	LPPS426	Policy 31	No	No	No		The road system is not good enough. Medical Centre not big enough. Schools not big enough. Cookley village too busy now NPPF (Para 136) Green Belt boundaries should only be altered where exceptional circumstances are fully considered and justified.	NPPF (136) Green Belt boundaries should only be altered when exceptional circumstances are fully considered and justified.	No	
Pannell Richard	LPPS436	Policy 31	No	No	Yes	Justified Effective	Lea Castle plan does not achieve a sustainable development. Infrastructure plans do not qualify as a sustainable development. Infrastructure is not guaranteed. Access for vehicles from 1400 homes is given as white arrows and clearly not to engineering and safety standards. Vehicle, cycle and pedestrian access to the infrastructure and resources of Cookley will be highly dangerous and an overload. As an isolated island within a dangerous major road and farm land and protected wildlife sites, travel out will all have to be done by vehicles which is contrary to United Nations Climate Change requirements until fully electric vehicles charged from renewable energy are the legal norm. A sustainable development has to follow the example of Graven Hill, Bicester, Oxfordshire. This housing and community site, once an MOD ordinance depot, has similarities with Lea Castle in that it is a brownfield site, isolated but in a protected greenfield area. It had planning permission for 1900 homes and is in its first phase of affordable homes delivered by Bromford. www.gravehill.co.uk The range of different sized projects includes detached, semi detached and bungalow designs using a mix of kit homes and self-build projects. There's the potential for groups of people to work collaboratively, for example by creating a terrace of eco homes, and a primary school, local pub and shops are planned.	Lea Castle development must follow a more sustainable plan as indicated with reference to the Graven Hill, Oxfordshire site. A new requirement will be for a proportion of housing to be to the 'passive house' standard. Do the team of designers who put in a postage stamp 'allotment', when each house has a two car garage think we are easily misled? Phased building of the infrastructure has to be legally guaranteed without a drain on the local public funds and in phase with the take-up of occupation. That should consider free transport to the rail interchange for employment access in the West Midlands. Otherwise local communities and already overloaded transport systems will suffer. This solution is being implemented in European cities (Luxembourg, Hamburg) and it is negligent of planners not to indicate where the money would come from. Local authorities are falling behind in maintaining infrastructure and are unable to cope with expansion.	No	
Powell Katie	LPPS448	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent	I had no communication to notify me of the consultation. The local area does not need or want this. There is a conflict of interest regarding Amec Foster Wheeler.	• A Green Belt review needs to be carried out again by an independent body. • The road network will be overcrowded on a road that is already far too busy	Yes	There is no need for these houses in this area - the survey identifies this surely there must be

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						with National Policy		and dangerous. • It does not comply with the government requirement of 30% affordable housing. • No infrastructure guarantee.		brownfield sites elsewhere that could be utilised instead of using beautiful Green Belt full of wildlife.
Grumbridge Charles	LPPS456	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Out of the 1400 houses there are only 200 affordable houses. Why use Green Belt when there are brownfield sites in Kidderminster. There is no consideration for the safety for road users.	Build houses near to where people work.	No	
Harrison Lee	LPPS467	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	I did not receive leaflet through the post. Amec Foster Wheeler, did Green Belt review also consultants for Homes England in 2017 (conflict of interest).	We need the right to be able to attend meetings. Green Belt review needs to be reviewed by an independent consultants.	No	
Lee Stephen	LPPS470	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	If this plan goes ahead, Kidderminster would effectively swallow up Cookley. Green Belt land is in place to prevent this merger. The Green Belt is to preserve the setting and character of a town.	1. There is no provision for single person accommodation or starter homes. 2. The plan doesn't provide much needed affordable housing. 3. There should be 30% social housing on the site - this is not the case.	No	
Preece Daryl	LPPS472	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	I believe that national legislation is being abused. I also believe that the infrastructure is out of place for such a project of this size.	A greatly reduced number of dwellings that falls in line with original plans must comply with NPPR.	No	
Powell Kenneth	LPPS474	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with	No letter received in post to notify me of consultation or meeting to attend. The houses proposed do not meet the need for our areas. Conflict of interest re Amex Foster Wheeler who carried out	Green Belt review needs to be carried out by an independent body. Roads in the area not able to cope with the extra traffic required for a development of proposed magnitude. Only 20% of affordable housing proposed. The	No	There is not a need for these houses in this area as per the survey carried out.

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						National Policy	Wyre Forest review in 2016-17 have been advising Homes England since 2017.	Government requires 30%. Infrastructure not in place to cope with the extra needs required (Doctor, Roads, Shops)		
Huntley Wendy	LPPS476	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	As Amec have been used for the source consultation with Green Belt review and Home England and there is a conflict of interest. Para 136 boundaries should not be used when there are other brownfield sites that should be used.	It would be better to get all the infrastructure in place and then decide where small affordable houses should be built having school, doctors and transport in place. It should be looked into legally as to how it has been the Amec and Green Belt and Home England can be allowed to consult on the same issues. When all disused brownfield site have been used then it is time to look at these sites.	No	
Talbot Jayne	LPPS479	Policy 31	No	No	No	Positively Prepared Justified	My understanding of the development at the Lea Castle site is that the majority of housing is not all is going to be high end housing thus making it impossible for our young local families to afford their own homes. This development will only attract people from the likes of Birmingham that can afford these types of homes which will bring more people into the area which will put further stain on our poorly organizes and underfunded amenities like school's road network and our local NHS.	First of all, making a larger percentage of affordable housing available for young local family's. Secondly putting into place from the start on the Lea Castle site amenities like schools and a Doctors surgery. Improving the road network around the site to reduce serious accidents like the death of a young motor bike rider on the tee junction of the A449 from Cookley in recent months. Also, the way into Kidderminster centre through the Horsefair is another serious congestion point I do not see the plans to make a one-way system around the Peacock Pub a viable alternative because of the complexity of the traffic control that will need to be put into place.	No	
Powell Joanne	LPPS486	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	I received no communication to notify of the consultation and therefore did not attend. The development does not meet the need of the local area. Conflict of interest regarding Amec Foster Wheeler who conducted Wyre Forest Review in 2016 and 2017 and have been advising Homes England since 2017.	A Green Belt review needs to be carried out again by independent body. The A449 is already extremely busy and dangerous, lives have already been lost. The road network will simply be overloaded ad no amount of modifications will alter this. It does not comply with the government requirements for 30% of affordable housing. There are no infrastructure guarantees re doctors, schools, roads and shops.	Yes	There is not a need for these houses in this area. The survey carried out states this. Please refer to the aforementioned comments highlighting my other areas of concern.
Powell-Tibbetts	LPPS490	Policy 31	No	No	No	Positively	No letter to notify of consultation.	• Green Belt review to be carried out	Yes	To explain my

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Jemma						Prepared Justified Effective Consistent with National Policy	Not meeting the need of the local area. Conflict of interest re Amec Foster Wheeler who carried out Wyre Forest Review in 2016 and 2017 have been advising Homes England since 2017.	again with an independent body. • Dangerous A449 road. Busy junctions. • Needs to comply with Government re 30% affordable housing not 20% in this instance. • No infrastructure guarantees - Doctors? Shops? Schools? • Road network overloaded.		views. There is not a need for these houses. As per the survey carried out we all know there is no need there. Certainly not for the kind of properties proposed. Will not regenerate the main part of Kidderminster. I am absolutely fed up of everything these days being ruled by money. We all know the only reason our beautiful Green Belt is being considered for development is to mutually line the pockets of both the council and housing developers. You certainly wouldn't have it on your doorstep and there is no mention of the wildlife that will be destroyed. Lives lost for money!
Wills Peter	LPPS499	Policy 31	No	No	No		No delivery of leaflets to household. Original consultation did not include the release of Green Belt fields.	There appears to be over development of the area. Whilst the Lea Castle Site is acceptable for development the greenfield sites do not tend to be taken in to the equation.	No	
Woods Carol	LPPS515	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National	This is a disproportionate amount of housing as 600 houses has already been approved in this area and it was too excessive to have an additional 800 houses and is taking up far too much Green Belt, concentrated in one area. Although the plans suggest doctors, school and shop, this may not happen and if it does they will be built last and will put enormous pressure on Cookley facilities	There are lots of land in disused industrial areas in Kidderminster town which could be built on or converted to homes which will allow in people to use current infrastructure and bring life back to the town centre - much needed!	No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 31: LEA CASTLE VILLAGE

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Policy				
Fallon Boyd	LPPS518	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Amec Foster Wheeler clearly have a conflict of interest being involved in the Green Belt review and advising Homes England. I did not receive notification of the presentation events as is the case for many others. There is no evidence that there are exceptional circumstances for the Green Belt boundaries to be altered. The whole development falls woefully short of affordable housing as required by law	The public need to be made fully aware of the plans that are being put forward and be kept informed of proposed developments. Proof of the exceptional circumstances to alter the Green Belt boundaries needs to be displayed and shown to be credible. The number of affordable homes across the whole proposed development needs to meet national guidelines and local need to ensure the opportunity for local children can continue to live in the community they were raised in.	Yes	Many voices of the people who will be affected by these plans should be listened to.
Fitter Gary	LPPS525	Policy 31	No	No	No	Justified Effective Consistent with National Policy	Does not comply with duty to co-operate as were not informed of the consultation meetings until after they had taken place! (this happened to many others). Brownbelt land should be used instead of Green Belt (ref Green Belt review 7.7 para 133 The NPPF) - not exceptional circumstances! This will destroy local wildlife and lead to increase in pollution (section 31.3 para 23) The 2 main roads (A451 and A449) are already dangerous roads and have had recent fatalities. The current roads will not cope with an extra 2000+ cars. Country lanes are already horrendous at rush hour. There will be an increase in light pollution for the surrounding area. Surrounding areas and villages will be affected in particular Blakedown and the increased demand at the railway station where parking is inadequate. The Wolverley & Cookley Parish Council Housing Needs Survey showed a demand for starter homes and downsizing homes. This plan will not meet these needs and does not meet national guidelines for affordable housing (policy 8b). There was a conflict of interest with Amec Foster Wheeler used for both Homes England and the Green Belt Review.	Independent agent should re-do the Green Belt review. Policy 8b does not meet these specifications or national guidelines on affordable housing.		We were not notified of the consultation meetings. Discussion of objections from section 6.
Merrill Richard	LPPS529	Policy 31	Yes	No	Yes	Justified Effective	Unsound because it does not take into account the effect on traffic on adjacent and nearby 'commuter' roads which are already overbusy at peak travel time.	1. It is a fair assumption that a high proportion of Lea Castle Village residents will work in the Birmingham/Halesowen direction. The only west/east road nearby is Rocky Lane/Stakenbridge Lane. This is already heavily used at peak times witness the queues in the morning to get out onto the A456 adding to the existing delays all the way to Hagley Roundabout. Also the queues in the pm at 5 ways junction adding to what is already a very	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								dangerous junction where there have been a number of fatalities. The development also will increase the traffic along Axborough Lane. a very narrow land and already being increasingly used as a 'rat run' in the evenings as people try and avoid the 10-15 mins queue trying to join the A449 from Beechtree Lane. If this development proceeds it is essential to consider the effect on traffic on the principle commuter road on the east/west line and improve what are principally lanes accordingly. 2. Irrespective of the above the building of houses and industry outside of the Lea Castle Hospital site is a gross intrusion in the greenfield area and should be resisted, indeed not allowed when other bronfield land exists around Kidderminster and in the Wyre Forest Area.		
Hackett Debbie	LPPS532	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Not notified of consultation Does not meet the need of the local area Conflict of interest regarding Amec Foster Wheeler who carried out Wyre Forest review in 2016/17, they have been advising Homes England since 2017.	An independent body to carry out the Green Belt review again. The A449 is a dangerous road with junctions that are already busy. 20% affordable housing does not comply with government recommendation of 30%. No infrastructure guaranteed - doctors, schools, etc. Road network will be overloaded.	Yes	To explain my view that the proposed development is not needed. There are already several developments within the area such as Hagley and Silverwoods that have not finished being built and sold so there is definitely no requirement for these houses on precious Green Belt land. No consideration has been taken for the wildlife that will lose their homes, it is purely an act of greed!!
Harris Simon	LPPS534	Policy 31	No	No	No	Positively Prepared	- It would appear that there has been a conflict of interest between Amec Fosters review at Wyre Forest Council whom	No Guarantee of amenities required to service the extended community. No enough	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Justified Effective Consistent with National Policy	has also been advising Homes England within same time frame. - No consideration to meet the needs of the established local area - no letter of consultation notification	consideration for current infrastructure and impending impact on road system and safety, drainage and irrigation lost. Significant and unnecessary loss of Green Belt land lost, currently providing irrigation.		
Carloss Adrian	LPPS536	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	1. Plan not positively prepared as 1 and involves terminology confusing to the layman, therefore as I don not have planning/legal training I have no idea if it is legally compliant, sound or complies with the duty to co-operate. 2. Not justified as local needs survey from Cookley shows we need a total of less than 200 houses, therefore the Lea Castle Development is designed for national needs, particulars driven by immigration not local needs of local people. 3. Not effective - Lea Castle Development will cause road chaos, inflamed by the proposed quarry. 4. WFDC consultation notice not received by many residents.	Formal chaired WFDC/Residents public meeting needed to explain legal terminology. Many residents did not receive the WFDC formal notification of the consultation. This means the community has not been formally made aware of developments. Whilst the local conservative team have put their own flyers out, they are very often put straight in the bin as they are seen as political bulletins. Greater school/doctors facilities needed.	Yes	To clarify and expand on lack of communication and impact on local road network.
Anderson Peter	LPPS538	Policy 31	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	As a Cookley resident I have not received any form of notification about this proposed building site, this proposal has all been rushed through with no consultation with any local people we have not had the opportunity to have out voice heard over this development. The local authority declared this site as Green Belt for a reason. At the time they must have felt that: * to check the unrestricted sprawl of large built up areas * To prevent neighbouring towns from merging into one another * To assist in safeguarding the countryside from encroachment was a good enough reason to protect our countryside for our next generation. I also believe this development will increase the issues we have with the lack of transport, health and education infrastructure in the surrounding area.	I feel the review of Green Belt site needs to be carried out again with an independent body to ensure this site is fit for purpose, which I feel it is not. I have not seen any plans for any amenities to be added to the site which means our local schools that currently are close to capacity will be under more pressure. Also the doctors surgery which once again is hard to get appointments will be even more over crowded. Focusing on the transport links, the local labour market with Wyre F only having 0.64 jobs per person against a UK average of 0.84 which in my view suggest that the Wyre Forest is not the place to build new houses as the jobs aren't in the Wyre Forest. Any additional population would be travelling out of the area but the transport links cannot sustain this. I feel all of the above make this proposed site unsound for the local area.	No	
Banks Jackie	LPPS540	Policy 31	No	No	No	Positively	As a Cookley resident I have not received any form of	I feel the review of Green Belt site needs to be	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Prepared Justified Effective Consistent with National Policy	notification about this proposed building site, this proposal has all been rushed through with no consultation with any local people we have not had the opportunity to have our voice heard over this development. The local authority declared this site as Green Belt for a reason. At the time they must have felt that: * To check the unrestricted sprawl of large build up areas. * To prevent neighbouring towns from merging into one another * To assist in safeguarding the countryside from encroachment was a good enough reason to protect our countryside for our next generation I also believe this development will increase the issues we have with the lack of transport, health and education infrastructure in the surrounding area.	carried out again with an independent body, to ensure this site is fit for purpose, which I feel it is not. I have not seen any plans for any amenities to be added to the site which means out local schools that currently are close to capacity will be under more pressure. Also the doctors surgery which one again is hard to get appointments will be even more crowded. Focusing on the transport links, the local labour market with Wyre F only having 0.64 jobs per person against a UK average of 0.84 which in my view suggests that the Wyre Forest is not the place to build new houses as the jobs aren't in the Wyre Forest. Any additional population would be travelling out of the area but the transport links cannot sustain this. I feel all of the above makes this proposed site unsound for the local are.		
Worcestershire Wildlife Trust	LPPS339	Policy 31.1 Lea Castle Vision	Yes	Yes	Yes		The WWT consider that this policy is both legally compliant and sound.		No	
Bareford Karin	LPPS179	31.1	No	No		Positively Prepared Justified	The infrastructure requirements of the village of Cookley are presented incorrect, the bus service is poor and under threat, the post office has now closed. Since the preferred options consultation in 2017 there have been significant changes to the local plan. There is significant wealth inequality in Wyre Forest, the new houses to be built on Lea Castle will not be affordable and therefore out of reach for the people in Wyre Forest. The needs for Cookley are, according to the housing survey, mainly affordable housing for young couples and bungalows, the Lea Castle Village does not aim to address this. The traffic on the A 449 is very busy and an increase with the infrastructure for an increase, let alone improvements for the present, have not even been addressed. These proposed houses on Lea Castle Village will only be affordable for wealthier people from outside our area, and burden road network and all other local services. Furthermore we have not received any notification of the consultation meetings			
Bareford David	LPPS136	31.1	Yes	No	No	Positively Prepared	The MUGA is situated alongside the A451 so would have to be surrounded by a very unsightly high netting along the road side	It should be moved.	Yes	To be heard

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							making an adverse impact on the remaining Green Belt.			
Long Jim	LPPS198	31.2	Yes	No	No		Unsound in that (1) Insufficient consideration has been given to the detrimental effect on surrounding areas and parishes to the Lea Castle Village development. In particular the effect of enhanced commuter traffic on Churchill and Blakedown as residents of the new village will require access to Birmingham and the West Midlands conurbation for services, employment and leisure. As a long standing resident of Blakedown I have seen the creeping saturation of capacity on the A456 and am concerned that rat-runs will be created all over the parish of Churchill and Blakedown by additional movements from the new village, affecting Hurcott Lane, Perriford Lane and Stakenbridge Lane, all routes to the A456. This will be not only through motor vehicles being used by new residents but also HGVs servicing the new village. There is to be a new car park facility at Blakedown Station under another part of the plan, and this is inevitably going to be attractive to commuters not only from Lea Castle but elsewhere and the A456 cannot cope realistically with all this additional pressure. (2) There has not been sufficient cross border liaison on solutions with neighbouring parishes, or if there has been more than the public documents the results have not been with Churchill and Blakedown PC of which I am a member. Although my comments are personal and the PC is making its own submission I would like to be associated with the comments of Mr John Lloyd (attached) who has circulated a copy to the Parish Council and addressed a meeting where I was in attendance. I understand the PC is referring to these comments in its own submission. A solution may be found in the following suggestions. I realise that transport matters are not in themselves a matter for the District Council since these are the responsibility of the County Council I would therefore hope the County Council will engage with local parishes to find I support the principle of increasing rail and bus travel, but suggest that public transport to and from Blakedown Station should be a new priority to provide a sustainable system. The Lea Village logic itself acknowledges that necessity in point 16 , viz: "A through route serving the school/community facility and the residential development should be provided to allow		No	

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							for buses to be diverted through the centre of the site to enable quality public transport provision". This principle should be extended and be at the core of the sustainability of this new development in particular but also generally. Frequent and suitably timed buses and improved interchange facilities at Blakedown Station (not purely parking) should be planned. These may take some time to become accepted by commuters who are used to no alternative to the private car, and so will inevitably require subsidy in the medium term by the developer, and possibly in the long term by the taxpayer but this would be in the interests of the wellbeing of the whole Wyre Forest community and serve to make a positive contribution to holding or even reducing traffic levels in the future. Inventive fare pricing methods such a "2 for 1" bus tickets or "through" tickets combining train and the last leg by bus should be explored.			
Worcestershire Wildlife Trust	LPPS340	Policy 31.2 Lea Castle Village Principles of Development	Yes	Yes	Yes		The WWT consider this policy both legally compliant and sound.		No	
Historic England	LPPS225	Policy 31.2	No	No		Positively Prepared Effective Consistent with National Policy	The Lea Castle Village principles for development do not refer to the potential archaeology or recording of above ground assets as set out in the LPA's site allocation heritage assessment work. It is noted that outline permission has been granted but this could expire and the requirements would not be clear since the policy makes no provision for the consideration of heritage assets but does for other matters.	It is recommended the principles for development include a criteria relating to the historic environment requirements as set out in the LPA's own site allocation heritage assessment information to demonstrate a positive approach to the historic environment and to ensure future developers are clear about the heritage requirements for the site.	No	
Natural England	LPPS649	Policy 31.2	Yes	No			Amendments needed to policy.	Policy 31.2 Lea Castle Village Principles of Development Surface water drainage from this site discharges into Hurcott pool, part of the Hurcott and Podmore Pools Sites of Special Scientific Interest (SSSI) (17/0205 Drainage Strategy- http://www.wyreforest.gov.uk/fastweb/welcome.asp), development at the site could impact the SSSI through bad water quality and reduced water quantity. The SSSI has suffered in the past from poor water quality and reduced water levels which have led to a loss of aquatic plants in favour of algae and	No	

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								impacted on invertebrate species, both of which are important food sources for a range of wetland birds. This policy should reflect these issues and include a point to ensure that current levels of water quality and volume entering the SSSI from the proposal site are maintained and that that improvements and net gains especially in terms of water quality are achieved as part of the development.		
Parsonage Louise	LPPS156	31.1	Yes	No	Yes	Positively Prepared Effective	The provision of a GP surgery and school would be essential if an additional 1400 homes are built. Cookley Surgery is already very busy and the school already over-subscribed. Smaller scale developments would lessen the strain on infrastructure.		No	
Sport England	LPPS277	Paragraph 31.1		No		Positively Prepared Consistent with National Policy	The land allocated for a 3G pitch as outlined in policy 31 should also clearly set out that an agreed contribution towards the cost of implementing the proposed 3G pitch is expected to be provided. The policy does not make provision for ensuring the management, operation and maintenance of the pitches which should be secured as part of the development. As set out, the policy therefore does not fully secure the proposed sports facilities in accordance with policy 96 of the NPPF and the evidence set out in the Playing Pitch Strategy.	Amend part 4 of policy 31.1 to read Retain and upgrade 3 existing grass playing pitches, provide new changing facilities, provision of car parking, provision of land for an artificial grass pitch (3G), together with an agreed financial contribution towards the cost of implementing the proposed AGP, and a financial contribution towards off-site built sports facilities, and securing on-going arrangements for the management, operation and maintenance of the new sports facilities that shall be clearly established as part of the outline planning application for the development of the site. This will ensure that the proposed new sports facilities are suitably secured in accordance with policy 96 of the NPPF and the evidence set out in the Playing Pitch Strategy.	Yes	
Tilly Jane	LPPS145	Policy 31, WFR/WC/33		No		Justified Consistent with National Policy	I believe that this aspect of the Local Plan is unsound. The Wyre Forest Green Belt Review (2018) identifies that this site 'contributes to the role of the wider Green Belt in this location, being part of open countryside to the north of Kidderminster. The land forms the principal context of the northern gateway to Kidderminster along the A449 Wolverhampton Road and development would alter the relationship between town and country in this location'. In particular, the review states it contributes to the following purposes of Green Belt land:	Removal of site reference WFR/WC/33 from the Local Plan.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							To check the unrestricted sprawl of large built-up areas - the site, whilst bounded on all sides, is of a sufficient scale and distinct character to mean that development would constitute a degree of sprawl into open countryside which separates Kidderminster and Cookley. Current development at Lea Castle comprises this role to some degree when the land is considered as part of a wider strategic parcel, although this is well screened and set on a plateau, meaning that the site retains a distinct countryside character. To assist in safeguarding the countryside from encroachment - the site contributes to the Green Belt through maintaining the openness of the countryside to the north of Kidderminster, notwithstanding adjacent development to the north and east at Lea Castle. Whilst the site is well bounded, it is of a scale and orientation to constitute a distinct landscape, particularly when viewed from the north western corner of the site where it adjoins the A449. Whilst it is accepted that there will be extensive development of the Lea Castle Hospital site (site reference WFR/WC/15), the above highlights the significantly greater impact on the Green Belt as a result of any development on site reference WFR/WC/33. I do not believe such an impact is justified and I believe that the Council should pursue the provision of more sustainable residential accommodation within the town centre of Kidderminster, in line with the need for elderly persons' dwellings and affordable housing as identified in the Wyre Forest Housing Needs Study (2018).			
Bareford David	LPPS135	31	No	No	No	Positively Prepared Consistent with National Policy	To call Lea Castle Village a sustainable, well-designed village is untrue. It is 1400 houses with little space to develop a village centre. It occupies prime Green Belt land, virtually links Cookley to Kidderminster, closes the corridor between Kidderminster and the Black Country and only encourages commuters to Birmingham along an already congested road link.	This should be kept to the original Lea castle Hospital site which is well contained.	Yes	To be heard
Pannell Warrick	LPPS164	31.0.1	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	- Local residents not notified appropriately of consultation meetings. WFDC have failed in their duty to co-operate with local residents. - Local Plan States: "identify where housing, retail and employment land should be located and the infrastructure required to support this growth" The proposals for Lea Castle Village do not reflect where		No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							residential developments are required in the greater area. Taken from www.nomisweb.co.uk/reports/imp/la/1946157198/printable.aspx the local labour market in the Wyre Forest (in 2016) was 0.64 jobs per head, therefore it would not appear that there are jobs within the local area to support a development of this scale. - Transport links are insufficient to support a development of this scale with it noted in the Worcestershire LTP that Kidderminster Railway station "ranks as the second busiest railway station in the county". With it further noted within the LTP that "There is a poor quality bus station in Kidderminster Town Centre which is not fit for purpose, and will need to be replaced with more suitable passenger transport stopping and interchange facilities". - The development of this site sets a precedent for developing on Green Belt land and, until such time as no further brownfield sites are available this land should not be considered.			
Talbot Dean	LPPS422	Policy 31	No	No	No	Positively Prepared Justified	My understanding of the development at Lea Castle site is that the majority of housing if not all is going to be high end housing thus making it impossible for our young local families to afford their own homes. This development will only attract people from the likes of Birmingham that can afford these types of homes which will bring more people into the area which will put further strain on our poorly organizes and under funded amenities like school's road network and our local NHS,	First of all, making a larger percentage of affordable housing available for young local families. Secondly putting into place from the start of the Lea Castle site amenities like schools and a Doctors surgery. Improving the road network around the site to reduce serious accidents like the death of a young motor bike rider on the tee junction to the A449 from Cookley in recent months. Also, the way into Kidderminster centre through the Horse Fair is another serious congestion point and I do not see the plans to make a one-way system around the Peacock Pub a viable alternative because of the complexity of the traffic control that will need to be put into place.	No	
Fitter Samantha	LPPS1012	Policy 31, Lea Castle Village	No	No	No	Justified Effective Consistent with National	Object to development on grounds of transport, that it does not meet the local housing survey, that there is a conflict of interest in the same agent used for the Green Belt review and for homes England, and that many local residents were not informed of the consultation meetings resulting in the failure	Green Belt review should be re-done with an independent agent. Not meeting national guidelines of 25% affordable housing. It falls below specifications in policy 8b.	Yes	As per the objections stated. We were not notified in time of the consultation

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 31: LEA CASTLE VILLAGE

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						Policy	of compliance and duty to co-operate.			meetings.

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Little Anna	LPPS1060	Chapter 31 and 32	Yes	Yes	Yes		The revised Local Plan has considered the technically valuable comments put forward in the previous consultation and has identified the most sustainable locations for housing and employment development. I support the proposed development sites put forward. The development of Lea Castle Village is a logical use of a brownfield development site that can be developed into a community with supporting facilities. The site is also located off the main road and could be easily accessed by public transport. The site is well-bounded by two main roads and a local road which could form a natural boundary to the development site. Furthermore, the development at Kidderminster East, the Land East of Offmore (OC/6) and Land at Stone Hill North (OC/13N) (and OC/11 and OC/12), is supported. With appropriate transport improvements in place, the development could be accessed by the A456 and A448. The sites are located in close proximity to the main roads and public transport services (buses) could easily divert to serve a community. Housing within OC/13N, although mixed-use, would be in a reasonable travel distance for access to Kidderminster Station. Locating development in this area could mitigate any additional impacts that could arise from additional housing in the district and increased pressure on the car park at the rail station. The development also rounds off the eastern boundary of Kidderminster. Use of brownfield sites is also supported.		No	
Taylor Wimpey West Midlands	LPPS1009	Policy 32		Yes			Policy 32 is supported as 'sound,' which includes two large sites under the control of Taylor Wimpey. Sites OC/6 and OC/13N form the majority of the proposed Kidderminster Eastern Extension, which will represent a sustainable, well designed extension to Kidderminster. The proposed Eastern Extension is underpinned by a wide range of evidence produced by the Council and supported by further technical reports commissioned by Taylor Wimpey to demonstrate the site is sustainable, suitable and deliverable.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in

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										the overall spatial strategy contained therein.
Guest Simon	LPPS139	Proposed access off Husum Way	Yes	No	Yes	Effective	I would like to object to the proposals for the proposed access off Husum Way. This proposal would greatly increase the volume of traffic in the area to unacceptable levels both in volume, noise and pollution. The area could not sustain such an increase and will block up this end of town like it has around the Worcester Road Island which was another ridiculous decision and has just served to create another bottleneck when trying to drive around Kidderminster. Perhaps investing in the old empty industrial building by turning them into flats may be a better idea.		No	
Bennett Laura	LPPS146	32	Yes	No	Yes	Justified	I do not believe other alternative areas have been fully considered. The land in question is Grade 2 Agricultural land and might be vital post Brexit for food production. It is also home to hedgerows full of wildlife and badgers. The access road off Husum Way will be dangerous and channel even more traffic down Hurcott road which is already overused in rush hour. The development will mean more people to use facilities on the estate which are already over subscribed such as the schools, which means children will face further competition to get a place at a school close to home. This will prove bad for the environment as more families will have to drive their children to other areas for school. A new spine road from Husum Way to Comberton Road would be used as a 'by pass' and we already suffer with excess traffic and boy racers at night. The spine road should snake through the development with far more twists and turns to support a proposed 20mph limit. It should also be closed at either side and a narrow pedestrian or cycle only bridge be built, Alternatively if the bridge must be suitable for vehicles then it must only be accessible for emergency vehicles using rising bollards. Whilst the new development has plenty of tree cover, very little thought has been given to the protection of the environment for existing residents. A tree 'bund' of at least 20 metres should be provided along the boundary of the existing Offmore development behind all existing properties at Husum Way, Munro Close, Rosetti Close, Tennyson Way, Chaucer Crescent, Prior Close and Ashdene Close.		No	
Bridge John	LPPS154	OC/5 to	No	No	No	Justified	Alternative and available land should be considered first. Green	Alternative and available land should	No	

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		OC/12					Belt land should be the very last resort to build on particularly as already mentioned is high grade agricultural land. I accept this may lead to fewer houses being built to the East of Kidderminster but missing homes could easily be provided by utilising other available land: - • Former Carpets of Worth site • Land at the former Sion Hill School site; which is currently 'reserved for future housing' • Extend the Lee Castle Site (as opposed to the suggestion of using part of the area for a quarry!) To bring more 'living space' into Kidderminster town centre. This would result in housing more suitable to 'younger' people and to evolve/enhance a more vibrant community spirit. If you do not consider the local plan is sound, please specify on what grounds; The following comments relate to the 'tick' box Justify The Green Belt to the east of Kidderminster plays a vital part in separating the town from the West Midlands conurbation. We already see major development at Hagley and any new development between our area and Blakedown can only contribute to closing the gap. The land in question to the East of Offmore is high grade agricultural land. With the uncertainty of Brexit and the uncertainty surrounding food prices post Brexit land should be kept available for food production. The land in question as well as being high grade agricultural land benefits from a historic irrigation system installed by Lord Foley. To the destruction of the beautiful Green Belt landscape to the east off Offmore would result in the loss of annual nesting habitat for endangered/declining bird species i.e., Corn Buntings, Yellow Hammers; also ground nesting birds, Lapwings, Skylarks and occasionally Curlew. More common wildlife loss would be to Badgers, Foxes, Hares and protected Bats which are often seen flying overhead to the east of Offmore. All this Green Belt land if proposals are passed to the building of houses would be lost forever! And this is unforgivable. Loss of privacy to the proposed building to the east of Offmore where existing houses are bordering the fields on the Green	be considered first. Green Belt land should be the very last resort to build on particularly as already mentioned is high grade agricultural land. I accept this may lead to fewer houses being built to the East of Kidderminster but missing homes could easily be provided by utilising other available land: - Former Carpets of Worth site Land at the former Sion Hill School site; which is currently 'reserved for future housing' Extend the Lee Castle Site (as opposed to the suggestion of using part of the area for a quarry!) To bring more 'living space' into Kidderminster town centre. This would result in housing more suitable to 'younger' people and to evolve/enhance a more vibrant community spirit.		

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							Belt/farmland. This will have a significant visual impact as the ground is elevated. Building in this area will result in LOSS OF PRIVACY for residents, high visibility, light and noise pollution. Access to the new road over the bridge from Husum Way will be dangerous. Cars are regularly seen speeding over the bridge - which also has a blind summit. Even a proposed island by Shakespeare Drive will be too close a distance from the bridge being approximately 475 feet/144 meters. The new proposed spine road must NOT give a continuous road link from Husum Way to Comberton Road for ordinary traffic. This road will become a 'Rat Run' and will become an unofficial 'By-Pass'! Whilst the proposed new development indicates some tree cover, very little thought appears to be given to the protection of the environment for existing residents. I therefore propose a tree boundary of AT LEAST 150 METERS should be provided along the boundary of the existing Offmore properties, Offmore Court barn conversions and cul-de-sac ends at: Husum Way, Munro Close, Rosetti Close, Tennyson Way, Chaucer Crescent, Prior Close, Elmdale Drive, Silver Birch Drive and Ashdene Close to ensure the privacy from people, noise and car pollution. Pressure of additional numbers of people to the existing Worcestershire Acute Hospital. All of my comments above are supported by OCAG -LP action group and majority of local residents in Prior Close.			
Pratt Stephen	LPPS700	Policy 32	Yes	No	Yes	Positively Prepared Justified Consistent with National Policy	National Policy states that Green Belt should only be developed in exceptional cases. Economic growth is not 'exceptional'. the proposed development of OC/6 agricultural land would destroy breeding habitat for endangered species which are on the RSPB Red list (Skylarks). Irresponsible development having no regard for impact on existing local residents. Fails to address any measures to regenerate Kidderminster town centre by obsession with developing rural areas.	The use of previously identified sites and brownfield sites has not been maximised. There is scope to increase development of Lea Castle Village area which is bordered by 'A' roads. There are other sites at Sion Hill, Bromsgrove Street, Hoobrook, Wilden Lane, Churchfields, Clensmore Street etc which are more suitable to development would help contribute to boosting town centre footfall.	No	
Ranford John	LPPS705	Policy 32	No	No	No	Justified	1. Have all brownfield land available sites been explored if so			

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						Effective	these should be used first. 2. Has prospect for developing in graded 2.3A agricultural land with historic irrigation systems. 3. Land is a flood plain in winter and summer 4. With Brexit we will require all good land.			
Lowe Donna	LPPS707	Policy 32	No	No	No		There are **buffer zones** where there are **no houses** and **no buffer zones** where there are **lots of houses.** The field at the top of the development narrows to 120m. How is this going to allow room for a road, houses, cycle way and a **promised buffer** zone of at least **30m** but now not shown on the plan? The exits proposed onto Husum Way, which is already a manic cut-through, will just be another death trap, accident black spot. It is just after a blind brow of a railway bridge, cars and motorbikes already speed in excess of 50 mph up this road, providing **another** 'rat run' too. This land is also Grade 2 agricultural land. Isn't this best kept for food production with the uncertainty of food prices after Brexit? Whilst land being saved, 'Spennells Fields' is of poor quality!! Behind the existing Offmore Estate the land rises sharply and is visible from a distance, whilst land behind Heathy Mill Farm is low lying. I have trouble crossing Husum Way now and I'm not elderly **yet** so how the elderly people who live in the bungalows on Husum Way get on especially at busy times beggars belief. This Green Belt land to the east of Kidderminster also is important to separate us from the West Midlands conurbation. We moved from Hagley after 20 years to come here because of the major building development going on there. Any more development here now is just closing the gap between us and Blakedown.	Stop the road and houses being built where the stream crosses the field so there is no need for an exit onto Husum Way. The houses then needed to help make up this 'required quota' can be built at the former Sion Hill School site already 'reserved for future housing' and if necessary the land at Captains on the Comberton Road. Also it's on the low lying part of the land. Zebra crossing on Husum Way is required now without any extra houses/traffic. The merging of all this traffic onto the Birmingham Road is a frightening thought as this is a notorious accident blackspot with collisions on a weekly basis, so an island here too is already required	No	
Lowe Geoffrey	LPPS709	Policy 32	No	No	No		Whilst fully understanding the need to create extra housing I feel that to take Green Belt land cannot ever be justified. The land to the east of Offmore is, in the farmer's own words, 'some of his most productive' and with an unsecure future post Brexit, surely this land must be kept safe for food production. I also feel the amount of properties on the development is far too great for one area, there are other areas around Kidderminster that could be utilised for housing, such as the former Sion Hill school and I also notice there is a 7.5 acre parcel of land near Silverwoods by the newly built Aldi supermarket - could this land not be used for housing? There is already a perfectly good road system in place complete with drainage and I presume utility services.		No	

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							These areas and others should be built on before taking productive Green Belt land. The addition of the road to this proposed development is also a worry, this is just creating another 'rat run' which then ends up at an already very busy road at Husum Way. To have a junction not very far from the railway bridge/blind summit is madness and needs to be re-thought. As in my previous notes the road junction needs to be modified. The Birmingham Road/Husum Way and Birmingham Road/Hurcott Lane junctions are an accident black spot. This new junction will create another. If this development goes ahead then the existing residents' privacy needs to be respected with a tree/bush planted buffer zone between the two with a minimum of 30 metres.			
On Behalf of Hodge Hill Farm Barns	LPPS711	Policy 32		No		Effective Consistent with National Policy	History Hodge Hill Farm Barns date in parts from the 17th Century and are of local historic interest. The conversion of the farm house and barns was shortlisted for the National LABC 2014 awards. The site is in Green Belt in the settlement of Hurcott. **Revised Local Plan** Hodge Hill Farm Barns lie to the east of the area designated by the Preferred Options as OC/5 (Husum Way, to the east of Kidderminster in the parish of Blakedown and Churchill). This is all Green Belt. The revised Wyre Forest District Council Local Plan is heavily based on the outsourced Amec Foster Wheeler Environment & Infrastructure UK Ltd. (AFW) Green Belt Review — Strategic Analysis report of September 2016. In addition, their Green Belt Review — Part II Site Analysis report of April 2017. The AFW reviews contained some conflicting comments, but above all else sought to designate the Green Belt as having a “Significant Contribution” (SC), “Contribution” (C) or “Limited Contribution” (LC). The revised Local Plan upon which we are passing comment in this document is based heavily on the original AFW reviews which are generally very subjective and contain factual inaccuracies such as lack of countryside views to the surroundings. Nonetheless, 0C/5 is stated as having designations of SC in the protection against “sprawl”, C for “encroachment” and an “overall” rating of C. Strangely, they gave a classification of LC	Yes		

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							with regards to “merger”. It is necessary to go back to the sub-contracted reviews and their reasoning by AFW as these have been adopted wholesale by the local authority in producing their current Local Plan, the subject of this submission. The AFW reports gave an assessment of “none” against the Green Belt preserving the setting of the character of villages and other settlements in relation to this site, which is opposed to their SC designation for protection against sprawl. The proposed road indicated for access to OC/5 is stated as the current access to Hodge Hill Farm and Barns plus Hodge Hill Cottages. This is a private road and would require a Compulsory Purchase Order to use for OC/5 and be a massive loss of amenity to the existing residents. If this access to the dual carriageway A456 Birmingham Road was used for any OC/5 domestic use, it would require a large amount of work to the junction — possibly a new traffic island — or at least arrangements as exist at the junction of Husum Way and the A456. **National Planning Policy Framework** It is considered the salient sections of the NPPF relating to loss of Green Belt land when considering the Local Plan by WFDC are: The purpose of Green Belt includes to assist in safeguarding the countryside from encroachment. • Preserving the setting and character of villages and other settlements. • Assist in urban regeneration by encouraging the re-cycling of derelict and other urban land. • Avoiding taking out of Green Belt prime agricultural land. **Local Plan** The extent of the original AFW proposals included a new Eastern By-pass from the A456 Birmingham Road to the A449 at the south of Kidderminster. This has been amended to a new road from Husum Way, just south of the railway line, leading through the proposed OC/6 housing and OC/13 N mixed “Kidderminster Eastern Extension” development to the traffic island at the junction of Comberton Road, Stone Hill and Spennells Valley Road. This new road will cause a massive loss of amenity to all the residents nearby (Offmore Farm and Spennells) via noise, visual amenity, pollution and additional vehicle traffic. The A456 is restricted to single carriageway through Churchill and Blakedown and further to the east at Hagley where recent residential			

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							development has added to the traffic congestion problems. The proposed new road will become a “rat run” as it will attract people to use it as a cut through to avoid the congestion at busy times along the Chester Road and on to the Kidderminster inner ring road. By using this new road, and travelling along Spennells Valley Road, access would be gained from the A456 to the A449 leading towards Worcester, missing out a large part of Kidderminster. The OC/13 N mixed development site will obviously attract additional traffic to businesses located there, as well as the usual amount of residential traffic, in addition from people living in the OC/5, and OC/6 developments. Coupled with the proposed new residential development sites in Hurcott to the north of the A456, the increased traffic movements will be enormous. Wyre Forest Local Plan proposals are to build in Green Belt in Hurcott and around Hodge Hill Farm Barns (OC/5), effectively becoming part of the town of Kidderminster. This can rightly be classed as urban sprawl and against the five main purposes of Green Belt. From the north passing to the east and south will be housing development culminating in a further massive loss of Green Belt land. The Local Plan is based on the WFA Preferred Options reports which attempted to qualify the loss of Green Belt land via use of its Sustainability Appraisal Methods. These then go on to list 13 points, the most pertinent ones being: No 6 SA Objective - To protect soil and land Decision-Aiding Criteria: Use brown field land. Result in loss of Grade 1, 2 or 3 agricultural land No 8-SA Objective to protect and enhance landscape and townscape Decision-Aiding Criteria: Likely impact on the District’s landscape/townscape, also the features that contribute to the character of the townscape/ landscape. No 12-SA Objective: To maintain the integrity of the Green Belt within the district? Decision-Aiding Criteria: How does it contribute to the five purposes of Green Belt: 1. Check unrestricted sprawl of large built up area.			

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							2. Prevent neighbouring towns merging into one another. 3. Assist in safeguarding the countryside from encroachment. 4. Preserve the setting and special character of historic towns. 5. Assist in urban regeneration, by encouraging the recycling of derelict and other urban land. No 13-SA Objective To maintain and enhance community and settlement identities Decision-Aiding Criteria: Retain the character and individuality of existing. Enhance the characteristics whilst accommodating growth. The above 4 SA Objectives have clearly been ignored, as have the decision-aiding criteria with the WFA Preferred Options, now incorporated and accepted by WFDC into the Local Plan. Using the above references, our comments are as follows: 6 There is obviously no attempt to protect Green Belt land. Accepting the loss of Green Belt land is ridiculous and against both the local authorities' own claimed aims as well as NPPF guidelines. It is questionable that it is suitable for use for housing and mixed development as it would be urban sprawl in an area which contributes to the separation of Kidderminster from its neighbouring towns, villages and settlements. The lack of in-depth detail in the document with regards to use of existing brownfield sites throughout the District is very shocking. The proposed OC/5 site results in the loss of prime agricultural land. 8 As for 6 above, the use of OC/5 would not enhance the landscape and the setting. This would rob every-one of the pleasant views across this rolling land with the hills beyond. It would lose the features which contribute to the character of the landscape. 12 The five points showing the purposes of the importance and integrity of the Green Belt appear to have been totally ignored in WFDC's decision to produce their Local Plan. It has been identified that the important break the Green Belt to the east of Kidderminster plays a vital part as a buffer to separate the settlements (of which Hodge Hill Farm Barns forms part) from the urban sprawl of Kidderminster. The loss of Green Belt to this area via proposed residential development would incorporate			

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							part of the parish of Churchill and Blakedown into Kidderminster. It is undoubtedly encouraging urban sprawl. Coupled with the proposed new road through the above mentioned parcels of land, makes the proposals totally unacceptable. If some form of south eastern traffic relief road is needed, it should be done via a major by-pass which incorporates and addresses the problems associated with the traffic congestion with other villages and towns in the general area. This is a parochial view by WFDC looking only at this district and not at the wider situation of traffic congestion problems. 13 In no way, shape or form can the proposals be classed as maintaining the character and enhancing the individuality of existing community and settlements. Not only will it remove the identity and characteristics of many smaller settlements and villages, it would deprive forever the benefits and purpose of this Green Belt land. The local authority has also ignored numerous environmental aspects. The noise, visual intrusion and pollution will be massive from the new road from Husum Way to Spennells. This would affect a large number of people both living and working in the areas. There are various breeds of bats to Hodge Hill Farm Barns. When these structures were converted from farm buildings to dwellings, the planning permission demanded the provision of both bat roosts, bat boxes and provision for other wildlife habitats based on the ecological survey. There is scant regard for the affects to wildlife in the Local Plan, including three species of bats, birds of prey and herons around Hodge Hill Farm Barns. The effects of the proposals would undoubtedly be detrimental to wildlife including protected species within and around 0C/5, OC/6 and OC/13 N sites. No ecological survey has been undertaken for these three parcels of land, which is shocking as such surveys and reports are a requirement for planning applications in semi-rural areas. Under the land forming OC/5 is a pumped foul water sewer which has not been mentioned by WFDC in the District Plan, which would affect the number of houses which could be built on the land. **Summary** The residents of Hodge Hill Farm Barns accept the need for new			

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							housing development within Wyre Forest District, but have major concerns regarding the amount of development proposed concentrated to eastern Kidderminster, including the use of prime agricultural Category 2 and 3 land in the Green Belt. It is averred this would not be sustainable development. We also believe that the WFDC Local Plan could better support the community through intelligent and sustainable regeneration of key areas of Kidderminster, Stourport and Bewdley. It is not considered sufficient investigation has been made of brownfield sites throughout the District. If the modifications to the Local Plan proposed were spread more evenly around the District, it would minimise the adverse impact on Green Belt, areas of SSI and reduce the urban sprawl of Kidderminster. The Local Plan as proposed is contrary to the aims and objectives of both Wyre Forest's stated planning objectives and those of the NPPF. WFDC appear to disregard the objectives of Green Belt policies. The concentrated loss of good quality Green Belt and agricultural land is unacceptable. It is considered for the above reasons as outlined in this Objection, Wyre Forest District Council should consider in more detail their own Sustainability Objectives. There has not been any information provided on estimated vehicle movements for the new road from Husum Way to Spennells. If common sense is used, it becomes obvious that any such road is going to attract traffic so as to avoid existing traffic routes in Kidderminster. The roads through Offmore Farm are inadequate to accommodate increases in traffic movements that the 0C/5, OC/6 and 0C/13 N proposals will generate from the proposed 2,800 dwellings for eastern Kidderminster. No account has been made for the reduction in air quality so many traffic movements will generate. The obvious increase in traffic caused by the proposals for the Kidderminster east developments for domestic and commercial use would require a major road by-pass, as stated above. This would probably be outside of the district to take into account the bigger problems of traffic congestion to this part of the West Midlands. Instead, the proposals show a relatively minor road which will become a 'rat run" depriving everyone living near its route of their amenity. It will create a "bottleneck" at the junction of Borrington Road and Comberton Road, Husum Way and Birmingham Road which will be exacerbated by the proposed			

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							closure of Hurcott Lane. The objections and reasoning behind them — outlined in this document cannot be classed as “not in my back yard” comments by ourselves. The proposals seriously affect a very large number of residents on the eastern side of Kidderminster plus other visitors to the locality.			
Capewell Jane	LPPS717	Policy 32	No	No	No	Justified Effective Consistent with National Policy	1. Have all brown land availability sites been explored if so these should be used first. 2. Farm land proposed for development is grade 2-3A agricultural land with historic irrigation systems. 3. This land is a flood plain in winter and summer. 4. Green Belt should be preserved for future generations. 5. Wealth of wildlife excluding badger sets near Silverbirch Drive. 6. With Brexit we will require all good agricultural land - when it's gone it's gone!. 7. The so called bund of trees should be at least 50 metres deep. 8. Under no circumstances should a spine road become an unofficial 'Eastern' by pass. 9. The road should snake through the proposed development to maintain a 20mph limit. 10. Use empty buildings e.g. Crown House change of use to residential there must be plenty of these in Wyre Forest.		No	
Maskery Kim	LPPS723	Policy 32		No			The land to the East of Offmore is completely unsuitable for development. There is already a disproportionate amount of traffic going through the Offmore Estate via Husum Way which is the proposed access point for the suggested housing scheme. Any new development on this scale needs to have a self-sufficient infrastructure and have easy access to main roads without impacting on existing local community traffic. The Lea Castle development will remove a sizeable area of what is currently Green Belt land but, if Green Belt land is to be used, it makes sense to utilise it fully, creating a single self-contained village rather than taking numerous swathes of rural land from around the town with the prospect of these areas eventually homogenizing.	If Lea Castle is developed sensitively but to its full potential it would certainly accommodate enough homes to make it unnecessary to build on land designated as OC/6/	No	
Green Kate	LPPS751	Policy 32	Yes	No	Yes	Positively Prepared Justified Effective	1. The proposed building plans for Offmore and Comberton concerns land which is in the Green Belt and is good, productive agriculture land. This is wrong. 2. The land at the proposed site stands on high ground and will be seen for a long way. 3. The bottom field is subject to flooding. Existing properties already suffer flooding. Any development will increase this. 4. Existing residents in the area will be affected greatly. All	1. There are many other sites in the area which could be developed instead of destroying the Green Belt fields. Such as: • Extending Lea Castle plans even further • Sion Hill school site, at present currently to be	No	

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							thought seems to have been given to the future residents of the development. 5. The site is full of wildlife, There is a large protected badger set very close to the existing barn conversion There are also owls, bats and foxes that live here. 6. The proposed road from Spennells island will be a rat run and the plan show it is to end with a junction at Husum Way, This will clearly be dangerous as it is just below a hump back railway bridge. Also, it seems there are no plans put forward to improve the hazardous junction of Husum Way/ Birmingham Road/Hurcott Lane. Both these areas will inevitably have increased traffic as a result of the new road. The proposed road will be used as a short cut around Kidderminster town and inevitably used by HGV's. 7. At the drop in session on Sat 17th November, at Offmore Evangelical Hall, I felt that the way that the plans were presented were misleading and difficult to understand. For e.g. The parcel of land between the railway line and Birmingham Road was marked on the council maps as housing, but on the Pegasus map was left untouched. Also, the colours used for the keys to the maps were too similar which made the maps difficult to understand.	'reserved for future housing' • Land at Captains on Comberton Road • Land off Wolverley Road adjacent to the Marlpool Gardens • Land off cul de sacs on Ferndale • Land currently for sale near the new Leisure Centre • Disused properties in Kidderminster Town Centre such as those above shops, Crown building and many other eyesores that stand empty. This would be a positive thing, bringing Kidderminster back to life instead of destroying our children's heritage. 2. Land behind Heathy Mill Farm could be used as this is low lying. Also 'Stone Hill North' area is also low lying and should be considered. 3. Obviously any increase in concrete and tarmac will exacerbate the flooding risk 4. The tree bunds proposed is completed lacking at the back of the Offmore barns and the rear and side of Offmore Care Home. It is lacking also along all existing properties and cul de sac ends at Husum Way, Munro Close, Tennyson Way, Rossetti Close, Chaucer Crescent, Prior Close and Ashdene Close. A bund of at least 100 metres should be provided, all along these properties. I am concerned about the access to Offmore Farm Close which is a very small and narrow, it will lead to the so called community orchard. Unfortunately, such unsupervised areas often lead to anti social		

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								behaviour. The Offmore Farm barn conversions have a private driveway, there is no mention of what will happen to this. 5. I would like to know what the planners are going to do about the large badger set that has been here for years.. 6. The proposed road should be access to the new estate only, and should definitely have traffic calming measures in place. Also a weight restriction to prevent HGV's using it. The road could be made in two parts so that it can never be used as a rat run. The dangers at the proposed junction at Husum Way is impossible to resolve. I feel the planners should make public the number of vehicles expected to use this new road. 7. In future drop in sessions, it would be helpful to be shown the true details in an easy to understand format.		
Whittle Peter	LPPS732	Policy 32	No	No	No		1. It is important all brownfield sites are utilised before the use of Greenfield A2 agricultural land, presently used for food production. 2. Utilising the additional land at the former Sion Hill sites be brought forward and included for housing in the review. 3. The empty Post Office in the centre of town be considered for redevelopment into flats for housing. 4. However if the development to the east of Offmore and Comberton is to take place, the following alteration to the proposals are essential: • The proposed access road off Husum Way is far too dangerous and must be altered. Access to the New Road must be taken from a point opposite the junction with Shakespeare Drive via a traffic island. • The new spine road from Husum Way to Comberton must		No	

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							not be used as a rat run and further planning must be taken to avoid this happening. • A tree bund at least 20 metres deep to be provided at the boundary of the existing Offmore development, i.e. behind all existing properties and cul de sac end at Husum Way, Munro Close, Rossetti Close, Tennyson Way, Chaucer Crescent, Prior Close, Silverbirch Drive and Ashdene Close. • A similar tree bund must also be provided at the rear and side of Offmore Farm Residential Home and the barn conversion development at Offmore Court by an extension of the proposed Community orchard.			
Martin Kev	LPPS734	Policy 32	No	No	No		I do not believe that it is justified to use Green Belt land for the proposed plan. The land to the east of Offmore and Comberton is Grade 2 agricultural land and I feel it would be unjustified to develop on such land, especially with the uncertainty of food prices post Brexit. Also, the proposed island by Shakespeare Drive will be too close a distance to the bridge, thus making it dangerous as cars are already seen speeding over the railway bridge.	I think the plan cold be modified by using other land such as the former Sion Hill School site which is reserved for future housing anyway. this would save the land to the East of Offmore and Comberton and would cause no need for the new unsafe road to be built.	Yes	I will do anything I can to protect this land.
Whittle Joan	LPPS736	Policy 32	No	No	No		Please use brownfield sites first! All farm land is needed for food production after Brexit. Please improve road safety at the junction of Husum Way traffic island and speed camera (if plan approved) If planning goes ahead a tree bund of 30 metres Access to the new development must be via Shakespeare Drive via a traffic island If planning is passed 20 mph limit on the spine road and speed bumps!		No	
Anderson Dana	LPPS739	Policy 32	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The land in question off Husum Way is Grade 2 agricultural land. It provides a Green Belt separation between the town and the West Midlands Conurbation. It would be a loss of quality land. The access road off Husum Way would be very dangerous because of the railway bridge. The spine road would need to have many snakes and twists and turns or be two cul de sacs to maintain a 20 mph limit. A tree band of at least 30 metres to be provided behind all existing properties at Husum Way, Munro Close, Rosetti Close, Tennyson Way, Chaucer Crescent, Prior Close and Ashdene Close. Similar band at rear and side of Offmore Residential Home and Barn Conversion development at Offmore Court. (extension of Community Orchard). The land behind the current Offmore estate rises sharply and is visible from a distance, while the land behind Heathy Mill farm is low lying. The bulk of the new housing must be in the low lying	Use of lower land in the Stone Hill North area and the additional land at the former Sion Hill School together with land off Captain's on Comberton Road. Use of land at Lea Castle to increase numbers for village status. Husum Way access should be opposite junction with Shakespeare Drive.	Yes	

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							ground of the "Stone Hill North" area. The amount of housing may be reduced however, missing homes can be provided by utilising the additional land at the former Sion Hill School site reserved for future housing and also the land at Captains on the Comberton Road. Also we did not receive any postal hard copy leaflets regarding the proposals. When we attended the 2018 earlier in the year or 2017 we could not get a hard copy of the proposals. It was very difficult to submit the online consultation reply. Very confusing as you could only remark on each page. The use of the tree band of 30 meters would provide tree cover to protect both existing residents and the environment. Extra traffic would raise levels of pollutants in surrounding air. The trees would offset some of the CO2. The band of sessile oak trees on Husum Way - these are mature oaks and provide a habitat for wildlife, which would be able to move across from the railway to Stone. The vegetation would also help the bees and other pollinating insects that could reduce once the farm land is used for housing. Sessile oaks are part of the Wyre forest and once formed woods throughout this area. The remaining sessile oak trees can also be viewed from a distance and would distract from the environment if felled.			
Perks Iain	LPPS741	Policy 32	Yes	No	No	Justified Effective	It is unsound in that access off Husum Way to provide a spine road is extremely dangerous. There will be a very short distance from the brow of the railway bridge to the proposed junction especially as not every vehicle adheres to the speed limit. The proposal that the speed limit of the spine road should be 20 mph is fanciful, vehicles are very rarely going to keep to that and will be used as a "rat run". No thought seem to have been given to the visual impact on existing homeowners backing onto the new development. Also the increase in noise particularly from approx. 3000 more motor vehicles.	In respect of the access off Husum Way for the spine road, I offer no modifications as for the reasons stated, this alone should prohibit the whole scheme happening. To prevent the spine road being a "rat run" the road should be closed at either side of the bridge, in effect two cul de sacs with access to pedestrians and cycle use only. At no point on Husum Way should there be an access road. For the reason set out, this part of the local plan that includes 300 homes should not go ahead. Even if trees are planted in front of our homes, it will take years before they are effective.	No	
Green Martin	LPPS743	Policy 32	Yes	No	Yes	Positively Prepared Justified Effective	1. The planners wish to destroy productive agricultural Green Belt land at Offmore and Comberton. 2. The proposed site stands on high ground and will be visibly offensive. 3. The bottom field is subject to flooding. Any development will increase the likelihood further. 4. It seems that little consideration has been made to the existing residents that will be effected, the priority seems	1. There are many other sites available without destroying the Green Belt fields. Such as: • Extending the Lea Castle site plans even further • Sion Hill School site, at	No	

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							to have been made to the future residents of the development. 5. This site has an abundance of wildlife, including a large protected badger set very close to the existing barn conversions. There are also owls, bats and foxes that live here. 6. The proposed road from Spennells island will be a rat run and it is planned to end with a junction at Husum Way, just below a hump back railway bridge. This will be dangerous. Also there are no plans put forward to improve the dangerous junction of Husum Way/Birmingham Road/Hurcott Lane which will have increased traffic as a result of the new road. I do not believe that the planners have researched the amount and type of vehicles e.g. HGV's that will use the proposed road as a short cut around Kidderminster town. 7. At the drop in session on Saturday 17th November at Offmore Evangelical Hall, I felt that the plans were presented were misleading and difficult to understand. For e.g. The parcel of land between the railway line and Birmingham Road was marked on the council maps as housing but on the Pegasus map was left untouched. Also, the colours used for the keys to the maps were too similar which made the maps difficult too understand.	present currently to be reserved for future housing • Land at Captains on Comberton Road • Land off Wolverley Road adjacent to Marlpool Gardens • Land off cul de sacs on Ferndale • Land currently for sale near the new Leisure Centre • Disused properties in Kidderminster Town Centre such as those above shops, Crown building and many other eyesores that stand empty. This would be a positive thing, bringing Kidderminster back to life instead of destroying our children's heritage. 2. IF building on farm land is deemed necessary, the land behind Heathy Mill Farm is low lying. Stone Hill North area is also low lying and should be considered. 3. Obviously any increase in concrete and tarmac will exacerbate the flooding risk. 4. The tree bunds proposed appears to be completely lacking at the back of the Offmore barns and the rear and side of Offmore Care Home. It is lacking also along all existing properties and cul de sac ends at Husum Way, Tennyson Way, Rossetti Close, Chaucer Crescent, Prior Close and Ashdene Close. A bund of at least 100 metres should be provided all along these properties. I am concerned about the access to Offmore Farm Close and the Offmore Care Home. the proposed pedestrian and cycle way is planned for Offmore		

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								Farm close which is a very small and narrow, it will lead to the so called Community orchard. Unfortunately such unsupervised areas often lead to anti social behaviour. 5. I would like to know what the planners are going to do about the large badger set that has been here for years. 6. The proposed road should be access to the new estate only, and should definitely have traffic calming measures in place. Also a weight restriction to prevent HGV's using it. Preferably the road should be in two parts so that it can never be used as a rat run The dangers at the proposed junction at Husum Way is impossible to resolve. I feel the planners should make public the number of vehicles expected to use this new road. 7. In future drop in sessions, it would be helpful to be shown the true details in an easy to understand format.		
Ensor Barry	LPPS747	Policy 32	Yes	No	No	Positively Prepared	The following is a response to the general layout map provided in the above document. We submit that the road layout shown in this map is presents obvious dangers to the public, with regard to the junction between the new road and Husum Way. A site visit should make it obvious that such a junction, just below the blind brow of the railway bridge should not even be contemplated. At the very least a traffic island at the junction of Shakespeare Drive and Husum Way, with the new road joining at this point, is the only safe option. We do not understand how the existing proposal could even be contemplated. Such an island would also have the effect of in the speed of traffic both up and down Husum Way. The speed surveys carried out by Highways can only be considered to be inaccurate due probably to their statistical nature, Any local pedestrian will point out that at peak and other times, a significant minority of drivers proceed in both directions at very high speed indeed. We submit that an examination of the maximum speed of some vehicles would be			

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							frightening in the extreme. The survey only shows that the majority of vehicles are travelling at a more reasonable speed. It is of no comfort to be told that most drivers on this road, probably won't kill you, if a significant proportion certainly may do so! We also doubt that the shear volume of traffic on Husum Way is clear from the survey. Again the statistics show the average daily number of vehicles. This does not take into account the fact that at other times of day, there is no traffic what so ever for extended periods. Anyone delivering or collecting small children on foot, to Offmore Primary School, will know the difficulty of crossing Husum Way at all during peak times. The elderly residents are also trapped in their houses at these times. The statistics need to be examined with reference to these peaks and troughs and it will then become clear that the addition of the huge number of Commuter Traffic vehicles from the new development will overload this junction and significantly overload the Husum Way/Birmingham road junction, even allowing for the provision of islands. There is already a queue twice a day from the Land Oak lights back to Husum Way. This will bring the new island at the junction to a standstill, just as it has at the similar junction at Hoo Brook. There is a rule of thumb in road junction design, that traffic lights and islands must not under any circumstances, be mixed on the same road, in this case the A456. The Hoo Brook Junction and the Ring road junction at Sainsbury's both prove this to be true, but Wyre forest now propose to make the same mistake again. It is obvious that a solution to the existing two problems caused by this avoidable error is not forthcoming, so why does the 'so called 'Local Plan, set out to do it again? At peak times, Husum Way is akin to Park Street and Wood Street, as an extension of the Ring road. This 'plan' will compound the errors made previously and render Borrington Road and Husum Way unusable for long periods of each day. An examination of a dictionary will make the definition of the word 'Plan' clear.			
Wood Alan	LPPS6	Local Plan Pre-Submission Publication (October 2018)	No	No	No	Justified Effective Consistent with National Policy	1: We have not been consulted as to the public right of way across our shared land which links Offmore Farm Court and the Offmore First Care home to Offmore Farm Close. I will not agree unless the Council adopts the whole of the road to the court yard. 2: The access opposite Shakespeare Drive via an island will be an accident black spot. Legally you should be held responsible for any claims. 3: The border surrounding the courtyard and care home is far too small. We have security issues with the rear of our properties. Land levels are such that our drive may collapse if disturbed by new works. We also have soak away on and to the farm land which can't be disturbed. 4: The bottom field floods and you want to build on it! They also	Possible solutions; 1. Adopt the road to the care home and courtyard, ownership would then be with the council. 2. This proposed island will be a massive danger no solution. 3. Increase the boarder to 100m around all affected properties. 4. Do not continue the link road over	Yes	See point 1.

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							cause flooding in the adjoining roads and gardens. More houses will cause further flooding. 5: This new road will be a rabbit run and the police will not enforce a 20mph limit. 6: The ground to the rear of the courtyard rises so much that new development will be visible across Offmore. 7: Who will remove the huge protected badgers set to the rear of Offmore court?	the river. IE 2 separate developments. 5. Again 2 developments. 6: Do not develop the high rise land. 7. No solution.		
Folkes Sally	LPPS43	0C/5 - OC/12	No	No	No	Justified	The following comments relate to not consulted properly • I and many local residents do not think that Offmore as an area has been consulted properly and clearly by Wyre Forest District Council. The whole process feels like a 'done deal'. The farmer agreeing to sell his land and the council agreeing readily to the usage of green land to building land. There are many brown filed sites to explore along with town centre 'living'. To date there are a lot of people totally unaware of the magnitude and scale of the proposed building area and the effect this will have on the surrounding roads. • The Consultation Response form (1st November – 17th December 2018) is not an easy form to just pick up and respond to. There are a lot of residents who are happy to respond but 'put off' by the difficulties of the legal and formal jargon used. • At the local drop in session at Offmore Evangelical church hall some of the council representatives were unclear and unable to respond to certain questions; and responded with 'I am unsure of that'. • Not received the green leaflet outlining all the proposed dates - I personally did not receive that leaflet. The following comments relate to the 'tick' box Justify • The Green Belt to the east of Kidderminster plays a vital part in separating the town from the West Midlands conurbation. We already see major development at Hagley and any new development between our area and Blakedown can only contribute to closing the gap. • The land in question to the East of Offmore is high grade agricultural land. With the uncertainty of Brexit and the uncertainty surrounding food prices post Brexit land should be kept available for food production.	• Alternative and available land should be considered first. Green Belt land should be the very last resort to build on particularly as already mentioned is high grade agricultural land. I accept this may lead to fewer houses being built to the East of Kidderminster but missing homes could easily be provided by utilising other available land: - A. Former Carpets of Worth site B. Land at the former Sion Hill School site; which is currently 'reserved for future housing' C. Extend the Lea Castle Site (as opposed to the suggestion of using part of the area for a quarry!) D. To bring more 'living space' into Kidderminster town centre. This would result in housing more suitable to 'younger' people and to evolve/enhance a more vibrant community spirit.	No	

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							• The land in question as well as being high grade agricultural land benefits from a historic irrigation system installed by Lord Foley. • To the destruction of the beautiful Green Belt landscape to the east off Offmore would result in the loss of annual nesting habitat for endangered/declining bird species i.e., Corn Buntings, Yellow Hammers; also ground nesting birds, Lapwings, Skylarks and occasionally Curlew. More common wildlife loss would be to Badgers, Foxes, Hares and protected Bats which are often seen flying overhead to the east of Offmore. All this Green Belt land if proposals are passed to the building of houses would be lost forever! And this is unforgivable. • Loss of privacy to the proposed building to the east of Offmore where existing houses are bordering the fields on the Green Belt /farmland. This will have a significant visual impact as the ground is elevated. Building in this area will result in LOSS OF PRIVACY for residents, high visibility, light and noise pollution. • Access to the new road over the bridge from Husum Way will be dangerous. Cars are regularly seen speeding over the bridge - which also has a blind summit. Even a proposed island by Shakespeare Drive will be too close a distance from the bridge being approximately 475 feet/144 meters. • The new proposed spine road must NOT give a continuous road link from Husum Way to Comberton Road for ordinary traffic. This road will become a 'Rat Run' and will become an unofficial 'By-Pass'! • Whilst the proposed new development indicates some tree cover, very little thought appears to be given to the protection of the environment for existing residents. I therefore propose a tree boundary of AT LEAST 150 METERS should be provided along the boundary of the existing Offmore properties, Offmore Court barn conversions and cul-de-sac ends at: Husum Way, Munro Close, Rosetti Close, Tennyson Way, Chaucer Crescent, Prior Close, Elmdale Drive, Silver Birch Drive and Ashdene Close to ensure the privacy from people, noise and car pollution. • Pressure of additional numbers of people to the existing Worcestershire Acute Hospital. • All of my comments above are supported by OCAG -LP action group and majority of local residents in Prior Close.			
Vickers John	LPPS58	OC/6,OC/13	Yes	No	No	Positively	I consider that the part of the Local Plan that refers to the spine	If the spine road is to be built the	No	

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						Prepared Justified Effective	road for the Kidderminster Eastern Extension is unsound for the following reasons. The junction shown on the map onto Husum Way is very close to the railway bridge which has a blind crest with Husum Way falling away steeply to its junction with Tennyson Way. Any queue of traffic below the railway bridge to the new junction would not be visible to traffic coming from the A456. Most traffic would be turning right from the spine road across that coming from the A456 again visibility would be a problem. Husum Way is already very busy not only does it carry all the traffic to and from the A456 from Offmore and Comberton and the three schools serving them but acts as an eastern bypass for traffic from Spennells, the A448 and via Spennells Valley Road from the A449 and A442. A junction onto Husum Way is not a viable proposition and is certainly not future proof considering the existing traffic flow and the additional traffic 1400 new houses, a community hub for public and retail services and a school would create. I do not consider the plan for a massive development to the east of Offmore to be sound. All the land concerned is high grade agricultural land that is used for food production and is part of the Green Belt that separates Kidderminster from nearby Blakedown. Part of the proposal is for a 400 place Primary school, this may well be too small as both Comberton and Offmore schools are already over subscribed. There is no mention of what happens to children of senior school age as all senior schools in Kidderminster are already over subscribed they would have to travel to schools some distance away. 1400 new houses will be home for a considerable number of children. I consider the whole consultation process to be flawed certainly with respect to the development to the east of Offmore, very few people appear to have received the council green leaflet which was supposedly delivered to all households, nobody I have spoken to in Prior Close received one despite this road being badly affected by the proposed development. The local drop-in session on Offmore was poor with some council representatives unable or unwilling to answer some questions. Many residents have had difficulty understanding what is required on the printed forms. The forms on the online portal require you to navigate your way through several windows before you get to them and so are difficult to find without any instructions. Sometimes you are not able to recover a saved draft to allow you to continue or only part of it is recovered, these problems have caused many people to give up and not respond at all.	only safe solution is to re-align it and route it over a new railway bridge to give access to and from the A456. It may even be possible to have a roundabout at map ref OC/5 which would give access to and from the A456 not only for Husum Way but also the new spine road. The spine road, Husum Way, Tennyson Way and Borrington Road should also be subject to a weight limit to reduce the amount of heavy goods vehicles using these roads as an eastern bypass. All alternative land should be considered and used first before any development takes place on the valuable agricultural and Green Belt land to the east of Offmore, any development that has to take place should be kept to an absolute minimum. Other options such as The former Carpets of Worth site, all land at the former Sion Hill School site, the site suggested for a quarry near Lea Castle, any derelict land or other unused sites in or near the town centre should be considered first.		
Poole Amanda	LPPS703	Policy 32	No	No	No		The proposed development of approximately 1,300 houses behind Offmore and Comberton would use valuable agricultural land (Grade 2, 3A) which also benefits from an historic irrigation system. This land will become even more agriculturally valuable		No	

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							when we leave the EU! The proposed access off Husum Way will make this well used 'rat run' even more dangerous. The only way to make it safe will be by the inclusion of a small traffic island adjacent to the Husum Way/Shakespeare Drive junction. Any new access roads that are built will need to 'snake' in order to keep the speed of the traffic down.			
Mowbray Colin	LPPS706	Policy 32		No		Justified	I oppose the Wyre Forest proposed plans to build on the Green Belt and prime agricultural land east of Kidderminster. Green Belt land is an area of protected land around large estates. The main purpose is to stop continued growth of these estates and maintain agriculture, forestry, wildlife, open space and above all clean air. Areas with this designation must not be built on. Offmore and Comberton is a large housing estate and the people who live here need that open space not only for our physical health but also for our mental health, further more I believe Wyre Forest council have a duty of care to ensure this. In today's environment, traffic, noise, pollution, strains and stresses of every day life the very last thing the residents, their children and grandchildren need is another ring of development surrounding it. The very reasons the authorities set up the Green Belt policy in the first place are exactly to stop what the Wyre Forest are proposing now but more importantly the people need the protection of the Green Belt more than ever before. We live by the law of the land, you do not dip in and out to suit. I fully understand the need for more homes but in this case there are many alternative sites. I also fully appreciate that many of these sites are not so attractive to the Wyre Forest or to a builder mainly I suspect due to size and cost, but I sincerely believe that the main consideration for future planning is 'what is best' for people and the environment which in this case includes the Green Belt and not an easy cheap solution by a politically motivated council or a big out of town builder. My final point is that any new future development anywhere, consideration must be given to the people and the environment which are already there. Things like natural screens, tree bunds, open space, anti traffic noise and pollution measures etc. are needed to maintain and protect the existing environment, residents and character.		No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Harper Anthony	LPPS708	Policy 32	No	No	No		• The Green Belt to the east of Kidderminster plays a vital part in separating the town from the West Midlands Conurbation. We already see major development at Hagley and any development between our area and Blakedown can only contribute to closing that gap • The land in question is Grade 2 Agricultural Land. With the uncertainty surrounding food prices post Brexit it is vital that such land is kept available for food production. Ironically this still holds true and we are aware that the land to the east of Offmore and Comberton, with built in irrigation is most productive yet is being taken for housing whilst the less productive land known as Spennells Fields is being "saved" even though it is poor quality and without irrigation! We accept, however, that whilst development to the East of Offmore and Comberton can take place WITHOUT development East of Spennells, development, East of Spennells is less easily developed without development East of Offmore and Comberton. However IF the development to the East of Offmore and Comberton is to take place, the following alterations to the proposals are essential: • The proposed access road off Husum Way it far too dangerous and MUST be altered. • Access to the new road must be from a point opposite the junction with Shakespeare Drive, preferably via a traffic island. • The new spine road must NOT give a continuous road link from Husum Way to Comberton Rd for ordinary traffic; if it s a continuous route it WILL be used as a "rat run" and will become an unofficial "by pass"- We propose that at the point where the new road crosses the brook via a bridge one of the following 2 options should be chosen: Either: A. the road should be closed at either side of the bridge (creating effectively two cul-de-sacs) and a narrow Pedestrian and Cycle ONLY bridge should be built. B. IF the bridge MUST be suitable for vehicles to access then it must ONLY be accessible for emergency vehicles (and possibly buses via rising bollards which would prevent access by private cars, vans etc. • In order to support a proposed 20mph limit on the "spine road", that road should snake through the development with far more		No	

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							twists and turns! Comments & Proposed Amendments Whilst the proposed new development has plenty of tree cover, very little thought appears to have been given to protection of the environment for existing residents. We therefore propose:-- • A tree “bund” at least 20 metres deep should be provided along the boundary of the existing Offmore development iebehind: all existing properties and cul-de-sac end at: Husum Way, Munro Close, Rosetti Close, Tennyson Way, Chaucer Crescent, Prior Close and Ashdene Closes • A similar tree “bund” MUST also be provide at the rear and side of. Offmore Farm Residential Home and the barn conversion development at Offmore Court, this could perhaps be by an extension of the proposed community orchard. We believe that, as the land behind the current existing Offmore estate rises sharply and is visible from a distance, whilst the land behind Heathy Mill Farm is low lying, the bulk of the proposed new housing MUST be in the low lying ground which is the “Stone Hill North” area. We accept that our proposals MAY lead to a smaller development but believe that any “missing” homes can easily be provided by for example utilising the additional land at the former Sion Hill School site which is currently to be “reserved for future housing”; the land at Captains on the Comberton Rd; land off Wolverley Rd. adjacent to the Marlpool Gardens estate OR on land off cul-de-sacs on Ferndale. We have spoken to two local estate agents in Kidderminster who have said that the housing demand in Kidderminster is static and supply of housing is adequate. Kidderminster is full of empty buildings - develop these into housing, e.g. Crown House. Please look at Brownfield sites before using valuable farm land			
Offmore Farm Residential Home	LPPS710	Policy 32	No	No	No		Ref: Part B Section 6 Our objections are as below: 1. The access to the Care Home and the Barns is via a Private drive. We would not be willing for others to use this to access the		No	

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							proposed new development. This would raise serious noise and security issues for our Care Home and be detrimental to the safety of the vulnerable residents that live here. 2. We also object to the proposal for a community orchard on the land behind Offmore. I believe that we would require far more than 20 metres of trees to absorb the sound, absorb Carbon - dioxide and screen the new development from our Residents. The main reason that we have such a high occupancy(98%) and a waiting list is that the Home is near Kidderminster but feels that it is in the middle of the countryside to our residents. The views from our lounges and first floor windows would be destroyed. Our Residents live with Dementia and often walk around the estate accompanied by our staff. The Seclusion and quiet is very important to them. 3. The Care Home has a reputation of being "homely" and a large scale development on its doorstep with all the accompanying noise and chaos would have a detrimental effect on the business and our occupancy. We are confident that the noise and disruption for our residents would be distressing for them, due to the nature of their illness and this could cause behavioural issues. We would argue this is one of the reasons that they moved into a care home rather than stay in their own homes. 4. We have some very real safety concerns for our residents about the impact of the increased traffic in the area. Most of them live with Dementia and should they wander this could cause fatalities. At the moment the residents enjoy walking with a staff member around the grounds, but with the increase in traffic so near to the home this could cause safety issues for people living in the home.			
Maskery Oliver	LPPS712	Policy 32		No			I purchased a house on Husum Way just three years ago. In that time the amount of traffic travelling to and from the Birmingham Road has increased dramatically and continues to grow at an alarming rate. Surely the traffic surveys that have been carried out prior to the creation of the Local Plan will have shown this? At peak times it is often difficult to get a car off the drive, which is a ridiculous situation on what was once a relatively quiet residential estate. Screening the new development with planting will not help at all as the added noise and pollution will be coming from the road immediately outside my house. This is to say nothing of the loss of the edge of countryside character of this area which is one of the reasons for buying this property in the first place. The planned development will inevitably have an impact on house prices in this area, particularly for those of us whose homes face	Brownfield and previously developed sites within the town should be the primary source of housing. Beyond that, although developing Lea Castle is regrettable, it appears to be a done deal. Surely such a huge piece of land will accommodate enough houses to meet the quota without having to remove this extensive area of Green Belt as well.	No	

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							or back on to land which is currently agricultural.			
Bridge Deborah	LPPS150	OC/5 to OC/12	No	No	No	Justified	The following comments relate to not consulted properly I and many local residents do not think that Offmore as an area has been consulted properly and clearly by Wyre Forest District Council. The whole process feels like a 'done deal'. The farmer agreeing to sell his land and the council agreeing readily to the usage of green land to building land. There are many brown field sites to explore along with town centre 'living'. To date there are a lot of people totally unaware of the magnitude and scale of the proposed building area and the effect this will have on the surrounding roads. The Consultation Response form (1st November – 17th December 2018) is not an easy form to just pick up and respond to. There are a lot of residents who are happy to respond but 'put off' by the difficulties of the legal and formal jargon used. At the local drop in session at Offmore Evangelical church hall some of the council representatives were unclear and unable to respond to certain questions; and responded with 'I am unsure of that'. Not received the green leaflet outlining all the proposed dates - I personally did not receive that leaflet. If you do not consider the local plan is sound, please specify on what grounds; The following comments relate to the 'tick' box Justify The Green Belt to the east of Kidderminster plays a vital part in separating the town from the West Midlands conurbation. We already see major development at Hagley and any new development between our area and Blakedown can only contribute to closing the gap. The land in question to the East of Offmore is high grade agricultural land. With the uncertainty of Brexit and the uncertainty surrounding food prices post Brexit land should be kept available for food production. The land in question as well as being high grade agricultural land benefits from a historic irrigation system installed by Lord Foley. To the destruction of the beautiful Green Belt landscape to the	Alternative and available land should be considered first. Green Belt land should be the very last resort to build on particularly as already mentioned is high grade agricultural land. I accept this may lead to fewer houses being built to the East of Kidderminster but missing homes could easily be provided by utilising other available land: - Former Carpets of Worth site Land at the former Sion Hill School site; which is currently 'reserved for future housing' Extend the Lee Castle Site (as opposed to the suggestion of using part of the area for a quarry!) To bring more 'living space' into Kidderminster town centre. This would result in housing more suitable to 'younger' people and to evolve/enhance a more vibrant community spirit.	No	

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							east off Offmore would result in the loss of annual nesting habitat for endangered/declining bird species i.e., Corn Buntings, Yellow Hammers; also ground nesting birds, Lapwings, Skylarks and occasionally Curlew. More common wildlife loss would be to Badgers, Foxes, Hares and protected Bats which are often seen flying overhead to the east of Offmore. All this Green Belt land if proposals are passed to the building of houses would be lost forever! And this is unforgivable. Loss of privacy to the proposed building to the east of Offmore where existing houses are bordering the fields on the Green Belt/farmland. This will have a significant visual impact as the ground is elevated. Building in this area will result in LOSS OF PRIVACY for residents, high visibility, light and noise pollution. Access to the new road over the bridge from Husum Way will be dangerous. Cars are regularly seen speeding over the bridge - which also has a blind summit. Even a proposed island by Shakespeare Drive will be too close a distance from the bridge being approximately 475 feet/144 meters. The new proposed spine road must NOT give a continuous road link from Husum Way to Comberton Road for ordinary traffic. This road will become a 'Rat Run' and will become an unofficial 'By-Pass'! Whilst the proposed new development indicates some tree cover, very little thought appears to be given to the protection of the environment for existing residents. I therefore propose a tree boundary of AT LEAST 150 METERS should be provided along the boundary of the existing Offmore properties, Offmore Court barn conversions and cul-de-sac ends at: Husum Way, Munro Close, Rosetti Close, Tennyson Way, Chaucer Crescent, Prior Close, Elmdale Drive, Silver Birch Drive and Ashdene Close to ensure the privacy from people, noise and car pollution. Pressure of additional numbers of people to the existing Worcestershire Acute Hospital. All of my comments above are supported by OCAG -LP action group and majority of local residents in Prior Close.			
Miah Shazu	LPPS202	OC/5 and OC6	Yes	Yes	Yes	Positively Prepared Justified Effective	The Council has failed to inform residents properly or adequately of the consultation process.	There are number of unused brownfield sites that have not been allocated. Land adjacent to the former Sion Hill site should be built	Yes	It is important to hear the views of members of public as this is a major development which

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								upon. There will be rising buildings on the hills at the site which will reduce privacy to residents. The green space proposed is likely to attract anti social behaviour and will be insecure. There needs to be at least 50 meters of tree to enable privacy and mask any noise and disturbance. The road junction will dangerous at the Husum Way site.		will change the feel, culture and lifestyle of the residents
Worcestershire Wildlife Trust	LPPS341	Policy 32-Kidderminster Eastern Extension	Yes	Yes	Yes		The WWT consider that this policy it is both legally compliant and sound.		No	
Campaign to Protect Rural England	LPPS561	Policy 32	No	No	Yes	Justified Effective Consistent with National Policy	Our objection is very similar to that to Policy 31. The development is unnecessary, because WFDC does not need to identify (and should not identify) sites for more than 5420 houses, less allowance for windfalls. (See objection 6.10). Since Wyre Forest is not part of Greater Birmingham HMA, it should not be providing housing for Birmingham or skewing its allocations to encourage commuting to there. We have seen and support Hagley Parish Council's paper on this. A456 through Hagley is used to (or even above) its capacity (see objection to 12-13) and this will make traffic on it worse. The Green Belt Assessment on which the release is based is flawed: see paper on this annexed to objection CPRE 6B.E. Additionally, some of this land is Grade 2 agricultural land, which ought to be kept producing food. Some of the land is marked on OS map as marshy, suggesting that it may be difficult to build houses that have good foundations and are dry.		Yes	
Machen Robert	LPPS648	Policy 32					1. Objection to building on Grade 2 Agricultural land with access to water when there are available brown sites in this area which need to be cleared. 2. The proposed access junction onto Husum Way, close a hump back railway bridge is highly dangerous with the prospect of 1,300 new homes having to access this junction is a danger to life.		No	

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							Husum Way is only a minor road already accessed as a cut through from the Spennells Valley estate making the Husum Way T junction to the Birmingham Road even more dangerous. 3. A proposed tree bund of 20 metres proving a boundary of the existing development is highly unacceptable and should be increased to the minimum of 40 metres, when a new access road has been agreed. 4. It will also be a shame to kill off the plentiful wild life on this agricultural land providing food and natural water resources.			
Ward Gary	LPPS769	Policy 32	No	No	No	Justified Effective	I feel that too much Greenfield land at Offmore Estate is being considered for housing and other areas should take share of the housing needs.	In reference to OC/5 on the plan. Is there a need to build up to 30 houses. Also there could be a danger with adding another junction on the main Husum Way Road, as this is already a busy road. Also, a junction south of the railway bridge is also a possible hazard to speeding traffic and location of other junctions. If a new road is built from the Spennells Valley Road to Husum Way, this will be used as a bypass/ rat run for traffic and would increase noise and pollution. My suggestion is to not build up to 30 houses on Green Belt Land OC/5 on Husum Way but to leave it as a 'Green Pocket'. As a gateway to Kidderminster and use it as a buffer zone for wildlife. Worst case, if houses are to be built on this land, modify the entrance that is already there which services the houses/ cottages at the Birmingham Road/ Hurcott Lane Junction so no need to build a new roundabout on the Husum Way - Birmingham Road junction. Also, if houses are to be built on the Green Belt east of Offmore Estate, limit them and have roads linked to Munro Close, Rosetti Close and Silverbirch Drive for access and make the new road from Spennells Valley Road a 'No through road' as to deter it from being used as a bypass / rat run.	No	

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								There should also be a buffer zone of 50 metres of trees/bushes to help reduce noise and pollution for the existing houses. One final point, other areas of the Wyre Forest District should share the housing needs, i.e. the vacant brown field land at the former Parsons Chain site on the Hartlebury /Worcester Road at Stourport on Severn. Also, the land at Ferndale and Habberley Estates on Habberley Lane in Kidderminster.		
Maskery Richard	LPPS726	Policy 32		No			I strongly believe that the current Local Plan proposals concerning development of land to the East of Kidderminster area are unsound, impractical and contrary to the best interests of the town. The council has a duty to protect Green Belt land and only use it for development as a last resort. With the present number of "brownfield" and previously developed sites available within the town, further expansion into the rural areas to the East is unnecessary and sets a dangerous precedent for the future. With space available for dwellings on sites such as Churchfields (231 homes), Limekiln Bridge (80), Silverwoods (59+) and Sion School (59) it is inconceivable that so much Green Belt land should be earmarked for housing. The planned Lea Castle development raises concerns of its own but is more practical in that it promises a self- contained community. With such a large scale development already rubber-stamped, it is hard to believe that so much other undeveloped land is being set aside as part of the proposal. The land to the East of Offmore is unsuitable for development for a number of reasons: 1/ There is already too much traffic passing through the estate. This has increased dramatically within the last two years (possibly following roadworks within the town) and drivers are not discouraged by existing speedramps. The volume of traffic that passes along Husum Way at peak times makes it unsuitable for a junction with the proposed new development at any point. If a new primary school is to be included within this development this problem would escalate, with those travelling to or from the new school having to merge with existing school traffic at key junctions. 2/ Even now, Offmore is a large estate. Extending it further creates the kind of "urban sprawl" that most councils are looking to avoid in order to protect the welfare of the population. Adding	The land to the East of Offmore OC/6 should be removed from the local plan on the basis that, combined with full utilisation of land available at Lea Castle, there are adequate sites within the town that will accommodate a sufficiently high level of housing to make the removal of this area from Green Belt and subsequent development both unnecessary and detrimental to the town as a whole. Instead, the following areas should be used a primary stage of housing allocation: • Churchfields Site ref BW/1 231 dwellings • Silverwoods Phase 1 ref FPH/23 59 dwellings • Silverwoods Phase 2 ref FPH/10 58 dwellings • Sion Hill School ref WFR/WC/18 56 dwellings	No	

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							another layer of residential development to an area of already extensive housing will create a mini-town but without the infrastructure to support it. 3/ Development to the OC6 area would be highly visible. The land rises to the East with the trees and fields providing an historic and important vista for both residents and visitors. Any housing here would be very prominent and detrimental to the overall appearance and perception of this side of the town. It should be noted that these factors were instrumental in ruling out the Baldwin Road development. 4/ Furthermore, the longstanding perception of Kidderminster is that of a country town. People who move here, particularly to this part of town are not doing so for employment — most work further afield - but because of its close proximity to the countryside. Extending the town will erode this character and impact upon the rural gateway that welcomes visitors to the town and its major attractions — the Safari Park and Severn Valley Railway - both of which are best served by more rural surroundings. 5/ Some of the land east of Offmore is Grade 2 agricultural land which will become increasingly important in years to come. Once it has been developed it will never be reclaimed for this purpose again. 6/ The amount of green buffering required to absorb the increase in noise and pollution (I would suggest at least 20 metres) would significantly reduce the area available for housing and make any development to the east of Offmore unviable. The housing quota is supposedly based upon an anticipated growth in population. Global population is falling, UK population growth has slowed and even the most recent Wyre Forest figures show a reducing figure. Social changes indicate that this trend is likely to continue and therefore the quota is likely to need revising in the near future. It makes complete sense to only use allocated sites within the town for the foreseeable future and review the housing requirement again in years to come.			
Poole Roy	LPPS719	Policy 32	No	No	No		I believe the land is of high grade 3 and 3A therefore should be used for crops. Tennyson Way would become a rat run and 20mph speed limit would be impossible to implement.		No	
Martin Emma	LPPS731	Policy 32	No	No	No		I do not consider this plan to be sound due to the fact that it destroys high grade agricultural land to the East of Offmore. It infringes on residents privacy as this East of Offmore land is elevated. It creates noise pollution and air pollution. It strips the wildlife of its natural habitat and quite honestly as human beings I don't know why we feel we have a right to do this (such arrogance!)	As stated on politics - Green Belt.org.uk website - the main purpose of Green Belt policy is to protect land around larger urban centres from urban sprawl, and maintain the designated area for forestry and agriculture as well as	Yes	I think that it is easier to get your point across verbally and also expand into further details on your objections.

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							Access to the new road over the bridge from Husum Way will be dangerous. Cars already speed at that point and the proposed island will be too close to the bridge, plus it will only become a rat run! I have knocked every door in Prior Close and I know that everyone that answered and spoke to me feel the same way.	provide habitat to wildlife. Areas that are designated as Green Belt must not be built upon as Green Belt is defined as an open space. However, building for agricultural uses are usually allowed: farm building/livestock buildings. Plus it maintain unique character or rural communities. I believe this should be respected and to go against this policy only lets down Kidderminster as a whole. Letting down current residential and wildlife with the destruction of this high grade agricultural land. Not to mention the safety aspect of creating such a ridiculous rat run!		
Pease Jillian	LPPS733	Policy 32	No	No	No		I don't see how using Green Belt land for development or building an unsafe road can be legally compliant or sound. Especially as it is so close to schools, it surely poses too big a risk. Neither do I see how it can be thought as being OK to strip our beautiful wildlife of its natural habitat.	There is still land to be used on the former Sion Hill school site and also Lea Castle which would not pose a danger or infringe on Kidderminster's Green Belt land, surely it is out job as residents to protect this land and help maintain the integrity of our home town, especially when there is land available else where!	No	
Pease Robert	LPPS735	Policy 32	No	No	No		The destruction of the Green Belt land to the East of Offmore Comberton would result in Kidderminster losing much needed grade 2 Agricultural Land. this land benefits from an historic irrigation system that was installed by Lord Foley and is also home to may endangered declining bird species, not to mention the more common wildlife, such as badgers, foxes, hares and protected bats that are often seen flying overhead to the East of Offmore.	I would propose that this land be preserved and left alone whilst the development should take place at the more appropriate site that doesn't infringe on Green Belt land at all.	No	
Folkes Neil	LPPS738	Policy 32					**Compliance with the** Duty **to co-operate** The following comments relate to not consulted properly • I and many local residents do not think that Offmore as an area has been consulted properly and clearly by Wyre Forest District Council. The whole process feels like a 'done deal'. The farmer agreeing to sell his land and the council agreeing readily to the usage of green land to building land. There are many brown field sites to explore along with town centre 'living'. To date there are a lot of	Alternative and available land should be considered first. Green Belt land should be the very last resort to build on particularly as already mentioned is high grade agricultural land. I accept this may lead to fewer houses being built to the East of Kidderminster but missing homes could easily be provided by utilising		

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							people totally unaware of the magnitude and scale of the proposed building area and the effect this will have on the surrounding roads. • The Consultation Response form (November — December 2018) is not an easy form to just pick up and respond to. There are a lot of residents who are happy to respond but 'put off' by the difficulties of the legal and formal jargon used. • At the local drop in session at Offmore Evangelical church hail some of the council representatives were unclear and unable to respond to certain questions; and responded with 'I am unsure of that'. • Not received the green leaflet outlining all the proposed dates - I personally did not receive that leaflet. **If you do not consider the local plan Is sound, please** specify **on what grounds;** The following comments relate to the 'tick' box Justify • The Green Belt to the east of Kidderminster plays a vital part in separating the town from the West Midlands conurbation. We already see major development at Hagley and any new development between our area and Blakedown can only contribute to closing the gap. • The land in question to the East of Offmore is high grade agricultural land. With the uncertainty of Brexit and the uncertainty surrounding food prices post Brexit land should be kept available for food production. • The land in question as well as being high grade agricultural land benefits from a historic irrigation system installed by Lord Foley. • To the destruction of the beautiful Green Belt landscape to the east off Offmore would result in the loss of annual nesting habitat for endangered/declining bird species i.e., Corn Buntings, Yellow Hammers; also ground nesting birds, Lapwings, Skylarks and occasionally Curlew. More common wildlife loss would be to Badgers, Foxes, Hares and protected Bats which are often seen flying overhead to the east of Offmore. All this Green Belt land if proposals are passed to the building of houses would be lost forever! And this is unforgivable. • Loss of privacy to the proposed building to the east of Offmore where existing houses are bordering the fields on the Green Belt/farmland. This will have a significant visual impact as the ground is elevated. Building in this area will result in LOSS OF PRIVACY for residents, high visibility, light and noise pollution.	other available land: 1. Former Carpets of Worth site 2. Land at the former Sion Hill School site; which is currently 'reserved for future housing' 3. Extend the Lea Castle Site (as opposed to the suggestion of using part of the area for a quarry!) 4. To bring more 'living space' into Kidderminster town centre. This would result in housing more suitable to 'younger' people and to evolve/enhance a more vibrant community spirit.		

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							• Access to the new road over the bridge from Husum Way will be dangerous. Cars are regularly seen speeding over the bridge - which also has a blind summit. Even a proposed island by Shakespeare Drive will be too close a distance from the bridge being approximately *475* feet/144 meters. • The new proposed spine road must NOT give a continuous road link from Husum Way to Comberton Road for ordinary traffic. This road will become a 'Rat Run' and will become an unofficial 'By Pass'! • Whilst the proposed new development indicates some tree cover, very little thought appears to be given to the protection of the environment for existing residents. I therefore propose a tree boundary of AT LEAST 150 METERS should be provided along the boundary of the existing Offmore properties, Offmore Court barn conversions and cul-de-sac ends at: Husum Way, Munro Close, Rosetti Close, Tennyson Way, Chaucer Crescent, Prior Close, Elmdale Drive, Silver Birch Drive and Ashdene Close to ensure the privacy from people, noise and car pollution. • Pressure of additional numbers of people to the existing Worcestershire Acute Hospital. All of my comments above are supported by OCAG LP action group and majority of local residents in Prior Close.			
Kirk Jon	LPPS740	Policy 32	No	No	No	Consistent with National Policy	This idea is extremely unsound and ill considered. The levels of pollution rose and congestion in my local area is going to double and my cul de sac will no longer be a cul de sac. This idea of building new housing on virgin land is a very poor idea as there has been at least 6 major sized buildings left to almost fall down that could and can be used if not for redevelopment but to build on within the town centre infrastructure alone to cater for the extra people alone is going to have to be massively upgraded and this will not be done. I find it very hard to accept that I have been looking for five years for a small plot of land to build a house on but as there is an unwritten rule for the minions of this country (no you can't) but here we have over 300 acres of virgin land being built on when there is enough money you can get what you want.	None. Drop the idea totally. Use what is already usable first before virgin land is used up in the name of greed	No	No point the decision is already made this is just a tick box exercise.
Cailfield Austin	LPPS742	Policy 32	No	No	No		I have attended two consultation sessions regarding the Offmore Plan and basically as other plans such as Spennells and Baldwin Road project have fell by the wayside, suddenly the Offmore project seems to railroaded in with no consideration to Green Belt containing Grade 2 agricultural land, traffic problems throughout the Offmore Farm and Comberton areas, and better sites lie	I am totally opposed to this due to these points: 1. Major safety issues on Husum Way which is a residential road	Yes	It is quite evident that the Council and its Planning Section have given hardly any consideration to brownfield sites

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							dormant throughout the Wyre Forest area.	2. Building on good agricultural land 3. Damage to wild life 4. There are many other brownfield sites which would be used		which could convert into dwellings. Furthermore, other sites such as the old schools of Sladen and Sion Hill remain empty and obviously the Lea Castle site into the perfect village for dwellings with easy access from two main roads. Where the Offmore site has safety problems especially at the Birmingham Road/Husum Way end of this proposed site.
Green Eileen	LPPS744	Policy 32	Yes	No	Yes	Positively Prepared Justified Effective	1. The planners wish to destroy productive agricultural Green Belt land at Offmore and Comberton. 2. The proposed site stands on high ground and will be visibly offensive. 3. The bottom field is subject to flooding. Any development will increase the likelihood further. 4. It seems that little consideration has been made to the existing residents that will be affected, the priority seems to have been made to the future residents of the development. 5. This site has an abundance of wildlife, including a large protected badger set very close to the existing barn conversions. there are also owns, bats and foxes that live here. 6. The proposed road from Spennells island will be a rat run and it is planned to end with a junction at Husum Way, just below a hump back railway bridge. This will be dangerous. Also there are no plans put forward to improve the dangerous junction of Husum Way/Birmingham Road/Hurcott Lane which will have increased traffic as a result of the new road. I do not believe that the planners have researched the amount and type of vehicles eg. HGV's that will use the proposed road as a short cut around Kidderminster town. 7. At the drop in session on Saturday 17th November at Offmore Evangelical Hall, I felt that the plans were presented were misleading and difficult to understand. For e.g. The parcel of land between the railway line and Birmingham Road was marked on the council maps as housing but on the Pegasus map was left	1. There are many other sites available without destroying the Green Belt fields. Such as: • Extending the Lea Castle site plans even further. • Sion Hill school site, at present currently to be 'reserved for future housing' • Land at Captains on Comberton Road • Land off Wolverley Road adjacent to the Marlpool Gardens • Land of cul de sacs on Ferndale • Land currently for sale near the new Leisure Centre • Disused properties in Kidderminster town centre, such as those above shops, Crown building and many other eyesores that stand empty. This would be a positive thing, bringing Kidderminster back to life	No	

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							untouched. Also, the colours used for the keys to the maps were too similar which made the maps difficult to understand.	instead of destroying our children's heritage/ 2. If building on farm land is deemed necessary, the land behind Heathy Mill Farm is low lying. Stone Hill North area is also low lying and should be considered. 3. Obviously any increase in concrete and tarmac will exacerbate the flooding risk. 4. The tree bunds proposed appears to be completely lacking at the back of the Offmore barns and the rear and side of Offmore Care Home. It is lacking also along all existing properties and cul de sacs at Husum Way, Munro Close, Tennyson Way, Rossetti Close, Chaucer Crescent, Prior Close and Ashdene Close. A bund of at least 100 metres should be provided all along these properties. I am concerned about the access to Offmore Farm Close and the Offmore Care Home. The proposed pedestrian and cycle way is planned for Offmore Farm Close which is a very small and narrow, it will lead to the so called community orchard. Unfortunately such unsupervised areas often lead to anti-social behaviour. 5. I would like to know what the planners are going to do about the large badger set that has been here for years. 6. The proposed road should be access to the new estate only, and should definitely have traffic calming measures in place. Also a weight restriction to prevent HGV's using it. Preferably the road should be in two parts so that it can never be used as a		

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								rat run. The dangers at the proposed junction at Husum Way is impossible to resolve. I feel the planners should make public the number of vehicles expected to use this new road. 7. In future drop in sessions, it would be helpful to be shown the true details in an easy to understand format.		
Rowley Alan	LPPS748	Policy 32					<u>The following comments relate to not consulted properly</u> • I and many local residents do not think that Offmore as an area has been consulted properly and clearly by Wyre Forest District Council. The whole process feels like a 'done deal'. The farmer agreeing to sell his land and the council agreeing readily to the usage of green land to building land. There are many brown filed sites to explore along with town centre 'living'. To date there are a lot of people totally unaware of the magnitude and scale of the proposed building area and the effect this will have on the surrounding roads. • The Consultation Response form (November —December 2018) is not an easy form to just pick up and respond to. There are a lot of residents who are happy to respond but 'put off' by the difficulties of the legal and formal jargon used. • At the local drop in session at Offmore Evangelical church hall some of the council representatives were unclear and unable to respond to certain questions; and responded with 'I am unsure of that'. • Not received the green leaflet outlining all the proposed dates - I personally did not receive that leaflet. The following comments relate to the 'tick' box Justify • The Green Belt to the east of Kidderminster plays a vital part in separating the town from the West Midlands conurbation. We already see major development at Hagley and any new development between our area and Blakedown can only contribute to closing the gap. • The land in question to the East of Offmore is high grade agricultural land. With the uncertainty of Brexit and the uncertainty surrounding food prices post Brexit land should be kept available for food production. • The land in question as well as being high grade agricultural land benefits from a historic irrigation system installed by Lord Foley. • To the destruction of the beautiful Green Belt landscape	• Alternative and available land should be considered first. Green Belt land should be the very last resort to build on particularly as already mentioned is high grade agricultural land. I accept this may lead to fewer houses being built to the East of Kidderminster but missing homes could easily be provided by utilising other available land: 1. Former Carpets of Worth site 2. Land at the former Sion Hill School site; which is currently 'reserved for future housing' 3. Extend the Lee Castle Site (as opposed to the suggestion of using part of the area for a quarry!) 4. To bring more 'living space' into Kidderminster town centre. This would result in housing more suitable to 'younger' people and to evolve/enhance a more vibrant community spirit.		

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<tr><td>Severn Trent Water Ltd</td><td>LPPS1057</td><td>Policy 32</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Positively Prepared</td><td>We would like to draw your attention to the High and Medium risk sites which we would be keen to discuss further to understand likelihood and growth trajectories.
<table>
<tr><td>OC/5</td><td>Husum Way</td><td rowspan="2">The development</td><td rowspan="2">Medium Risk</td></tr>
<tr><td>OC/6</td><td>R/O Offmore</td></tr>
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<table>
<tr><td>OC/12</td><td>Comberton Lodge</td><td>size

compared to the existing system means modelling will be required to determine the capacity impact. The site will likely require pumping and with combined growth capacity issues are expected at Hoobrook Terminal Pumping Station.</td><td></td></tr>
<tr><td>OC/13N</td><td>Land at Stone Hill North</td><td></td><td></td></tr>
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<tr><td>Gillespie Gaynor</td><td>LPPS963</td><td>Policy 32</td><td></td><td>No</td><td></td><td>Justified Consistent with National Policy</td><td>1. BACKGROUND
<u>Call for Sites and HELAA</u>

1.1 In 2015, the land at Captains, Bromsgrove Road, was submitted into the call for sites and representations were made into the issues and options consultation. The subsequent HELAA in 2016 included the site as being 1.23ha of brownfield land and 1.75ha of greenfield land (at this time the site was both Captains and the adjacent property the Lodge), with the total site capable of providing 135 dwellings (ref: WFR/ST/1). The HELAA commented that the brownfield elements of the site could deliver housing within 5 years, as this would not require land to be taken out of the Green Belt. The remainder of the site was considered potentially developable after 5 years, as this land would need to be released from the Green Belt.

<u>Green Belt Review April 2017</u>

1.2 In April 2017, the Amec Foster Wheeler Green Belt Review concluded that “the site makes only a limited contribution to Green Belt purposes, being well bounded with limited visual</td><td>Site WFR/ST/1 should be included as a core housing site.</td><td>Yes</td><td>To update the inspector on further ecological and tree surveys carried of at the appropriate times of the year to inform how much of the site is available for development whilst protecting and improving biodiversity.</td></tr>
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1.3 With regards to the effect of development on openness, this Review concluded that “development would extend the current built edge of Kidderminster along the A448 but this would not be substantial and would be visually contained by substantial boundary vegetation”.

1.4 In more detail, the Review concluded:

<table>
<tr><td>To check the unrestricted sprawl of large built-up areas</td><td>Limited contribution: development on this site would create a logical rounding off of the built edge of Kidderminster without creating sprawl along the A448</td></tr>
<tr><td>To prevent neighbouring towns merging into one another</td><td>Limited contribution: development would not contribute to coalescence</td></tr>
<tr><td>To assist in safeguarding the countryside from encroachment</td><td>Limited contribution: the bounded character of the site means that development would not create a sense of encroachment into open countryside</td></tr>
<tr><td>To preserve the setting and special character of historic towns</td><td>Limited contribution: the site has no role in this respect</td></tr>
<tr><td>Overall assessment of contribution to Green Belt purposes</td><td>Limited contribution: The site makes only a limited contribution to Green Belt purposes, being well bounded with limited visual connection. Development would extend the current built edge of Kidderminster along the A448 but this would not be substantial and would be visually contained by substantial boundary vegetation</td></tr>
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(p.36 Appendix C Green Belt Review April 2017)

1.5 This assessment of the site was unaltered in the Green Belt Review Part II Site Analysis published in May 2018

<u>Preferred Options Sustainability Appraisal Report May 2017</u>

1.6 In Appendix G.4 Local Plan Review Site Testing Tables – Kidderminster East, this site WFR/ST/1 was identified as having</td><td></td><td></td><td></td></tr>
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							"the potential to enhance the landscape by developing land that currently has a minor negative impact". The site was recognised as involving the redevelopment of a brownfield site and "thus development has the potential for a significant positive effect". 1.7 Of the 13 sustainability appraisal objectives used (two of which were divided into two scores within each objective), this site scored "major positive" (development would resolve an existing sustainability problem) in three of the objectives, "minor positive" (no sustainability constraints) in six of the categories, "neutral" in four of the objectives, N/A in one objective and a "minor negative" (potential sustainability issues, mitigation and/or negotiation possible) in the objective "to maintain the integrity of the Green Belt within the District". 1.8 This site did not score any "major negative" (problematic and improbable due to sustainability issues, mitigation is likely to be difficult and/or expensive) or any "absolute constraints". 1.9 Objective 9 considered the objective of conserving and enhancing the District's biodiversity and geodiversity and development of this site was considered "neutral" in its potential to adversely affect nationally protected sites and was considered "minor positive" in its potential to adversely affect locally protected sites. <u>Local Plan Review Preferred Options (June 2017)</u> 1.10 Consequently, in the preferred options publication June 2017, site WFR/ST/1 was the only potential site south of A448 Bromsgrove Road identified as a core housing site (i.e. a site common to both options A and B). Sites north of A448 Bromsgrove Road were also identified as core housing sites. Other sites south of Bromsgrove Road, surrounding this site WFR/ST/1 were included as option A housing sites only. In essence, option B sites were those identified as core housing sites and option A housing sites were proposed as additional to these option B core housing sites. The option A sites would require additional infrastructure. Clearly, WFR/ST/1 was seen as a site that could be brought forwards to meet housing needs without greater investment in infrastructure than required to meet the other core housing sites included in option B. <u>Preliminary Ecological Appraisal of potentially ecologically sensitive sites on WFDC's list of sites for allocation in the 2018 Local Plan (June 2018)</u>			

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							1.11 The appraisal identified features of biodiversity significance that could affect development of this site: • Wet woodland adjoining the Captain's and Stanklyn Pools and Spennells Valley LWS. • Drain and associated vegetation • Tall hedgerows – although the Leyland cypress trees are of very low ecological value, they do form substantial corridors across the site, along which bats and birds might commute. *Recommendations were therefore:* • Buffer the wet woodland and Captain's Pool by at least 50m and design the site to draw footfall away from/prevent access to the sensitive LWS receptor • Ensure that surface water is appropriately managed away from the wet woodland • A management plan should be produced to eradicate non-native species from the site (see section 4.1.2), including the Leyland cypress trees – although bat surveys should be carried out first • Extensive bat presence/absence and activity surveys, covering buildings and the wider site should be carried out to find out how bats use it for commuting and foraging. This information should be used to inform site layout and mitigation and compensation measures for bats, including fulfilling the connectivity function (if any) of the Leyland cypress hedgerows. • Full botanical surveys of the grassland are recommended when it has not been recently mown, to check for plant species of interest (e.g. the S41 species recorded nearby by WBRC). <u>Sustainability appraisal of the Pre-Submission Publication Draft Wyre Forest District</u> <u>Local Plan published October 2018</u> 1.12 This site receives a "neutral" score for local services and facilities, need to travel and sustainable travel modes, economy and employment and for community and settlement identities. It scores "minor positive compared to the current situation – no sustainability constraints" for housing needs of all. For soil and land, water resources and quality, flood risk, landscape and townscape and for Green Belt, it scores a "minor negative compared to the current situation – potential sustainability issues,			

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							mitigation possible". For historic environment it scores "neutral uncertain" and for biodiversity and geodiversity it scores "major negative compared to the current situation – problematic sustainability issues, mitigation difficult and/or expensive". Local Plan Review Preferred Options (June 2017) summary of consultation responses published October 2018 1.13 The WFDC officer comments for this site read: "This site is not proposed for allocation in this local plan. Limited development may still be possible based on existing footprint of development. Key issue is impact on ancient woodland and pools and streams complex which would severely limit the developable area." (Appendix 3b Kidderminster Urban Extensions) **2. MERITS OF THIS SITE** 2.1 It is in sole ownership and there are no known legal constraints to development of this site, which could be delivered within five years. There is the potential to provide a minimum of 70 dwellings on the site, subject to further ecological survey work being carried out, which may show that more land is available for development than can be confirmed at this time. Housing mix, including affordable housing, would be in accordance with current policies. The site has mains water and sewerage, electricity and gas, with good access onto the public highway A448 Bromsgrove Road. There are no known abnormal costs, other than a programme of works to provide ecological and biodiversity enhancement, and no known issues that would influence economic viability. There are no bad neighbour uses; the current low- key caravan storage use would cease. The site lies in a sustainable location, adjacent to the existing Spennells residential development. 2.2 Development of this site meets all of the relevant principles in proposed policy 6B Locating New Development, as it provides for accessible housing to meet objectively assessed needs, it makes effective re-use of accessible, available and environmentally acceptable brownfield land, it will safeguard and enhance the open countryside, it will have limited effect on the openness of the Green Belt and will be development adjacent to the urban area, where both housing needs and accessibility to more effective public service provision are greatest. 2.3 Until the publication of the Council's preliminary ecological appraisal (PEA) in June 2018, this site WFR/ST/1 was judged by			

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							the Council to be a good site for housing development. The Council has acknowledged that there will need to be Green Belt releases to meet projected housing needs and this site has been determined to make only a limited contribution to the purposes of land being included in the Green Belt. It was considered that development on this site would have limited effect on the openness of the Green Belt. 2.4 There is a local desire, expressed in the preferred options publication draft, that the number and scale of greenfield sites taken for development should be as small as possible. The major part of this site (2.1ha) is brownfield (see plan 8797-101 attached as **Appendix 1** to these submissions) and development on this site would thus meet this objective. 2.5 The Preferred Options Sustainability Appraisal recognised that there was potential to enhance the landscape by developing land that currently has a minor negative impact. **3. NEW EVIDENCE** 3.1 None of the recommendations in the Council's PEA prevent development of this site, they simply seek to protect and enhance the existing value of some parts of the site through measures to buffer the wet woodland and Captain's Pool by at least 50m, restrict public access, manage surface water appropriately, and carry out standard tree, protected species and botanical surveys to inform the site development 3.2 It is, unfortunately, the wrong time of year to carry out any detailed survey work of the site. Nonetheless, Swift Ecology were commissioned to provide an initial assessment of the relevant documents and a site visit was made in early December. Swift Ecology have since produced an ecological constraints and opportunities plan (ECOP attached as **Appendix 2** to these submissions). <u>Summary of Swift Ecology's initial comments:</u> *Main constraints:* • The WCC/Severnscape Preliminary Ecological Appraisal (2018) report recommends a minimum 50 m buffer of the designated Local Wildlife Site and ancient woodland. It may well be possible to reduce this buffer; this would need to be informed by further ecology surveys and information on the feasibility and effectiveness of			

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							mitigation for issues such as drainage, lighting, pollution and disturbance in order to demonstrate that the LWS will not be adversely impacted. At this stage we don't have enough evidence to specify and justify a smaller buffer, so the ECOP shows the full 50 m buffer to the LWS/ancient woodland. • Captain's Pool: recommend scrub planting in the buffer (whatever the size of the buffer) to limit public access to the pool and thereby protect wetland birds and their breeding/wintering habitats; drainage/pollution and lighting issues will also need consideration. • Ancient woodland: the buffer distance needs to be evidence-based (see guidance from The Woodland Trust). The key issues in determining the extent of the final buffer will be the ecological importance of the woodland and the site hydrology/drainage design. The ecological importance of the woodland can only be established through further survey (the optimal time for woodland botanical surveys is April-May). • Brook in southern part of the site. This will need buffering and could potentially be enhanced (see opportunities below). Minimum 5 m buffer along the banks based on EA guidance for minor watercourses has been included in the ECOP. • The mature cypress hedges provide a good network across the site and might be important for foraging/commuting bats. Further bat surveys would be needed to establish their importance. • The grassland across the site will need a more detailed survey in summer (May- July) to determine its importance. From the preliminary survey it seems unlikely that the grassland will be of high quality; however, if some or all of the grassland *is* identified as priority habitat, mitigation will be needed, although there is likely to be an opportunity to retain grassland/provide mitigation within a 50 m buffer of the LWS (to be determined by further survey). • The ecology buffer should be free from development and also have restricted or managed public access, with no public access to the designated sites (i.e. no footpaths or cycle paths to the woodland or pool). • Further surveys to inform detailed design (for example great crested newts (of which there are records within 1 km), bats roosts in buildings/trees, breeding birds, otter & water vole) could identify further mitigation requirements; however, it is likely that these could be incorporated into the ecology buffer of the LWS/ancient			

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							woodland. *Main opportunities:* The southern part of the site is a pinch-point in an otherwise green corridor, most of which is designated as a Local Wildlife Site. Restoration of the woodland that was lost to the caravan area, and extension towards Captain's Pool with new planting/habitat creation in the buffers and along the brook, would provide biodiversity enhancements, strengthen the link between Local Wildlife Site areas and contribute to GI targets for the district. • If the cypress hedges are not found to be of high importance for bats, replacing them with native tree planting across the site would be an improvement for biodiversity. • There may be opportunities for SUDs scheme to deliver biodiversity benefits. • Habitat creation in GI (including buffers) could also deliver biodiversity benefits. 3.3 With the maximum ecology buffer of 50 m from the LWS and Ancient Woodland, this leaves approximately 2.6 ha (excluding The Lodge) as 'developable area' purely considering currently known ecological constraints. It may well be possible to increase this area if we can negotiate a reduced ecology buffer with the LPA following further ecology & hydrology survey and consideration of all the possible impacts to produce a sensitive development design. **4. POTENTIAL FOR DEVELOPMENT** 4.1 The ECOP shows the maximum buffers that would be required until detailed survey work can be carried out which may well indicate that these buffer areas could be reduced. In other words, this plan takes a precautionary approach regarding the amount and location of land available for development. 4.2 Plan 8797-102 Proposed Developable Area (attached as **Appendix 3** to these submissions) shows that 2.6ha of land could be developed to meet housing needs, using the maximum buffer areas to protect ecological constraints. Of this 2.6ha development land, 2.1ha is brownfield. 4.3 The property known as the Lodge has been excluded from the plans attached to this submission. The owners of the Lodge have			

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							not instructed Stansgate Planning Ltd to act for them and so the availability of this site for development is uncertain. 4.4 As can be seen from the proposed developable area plan, there are many advantages to allocating this site for development. Development of this site would enable a comprehensive management plan to be prepared and maintained for the land between the development site and Captain's Pool: this land includes an existing woodland TPO, a Local Wildlife Site and an area of Ancient Woodland. The existing incursion of a substantial area of hard standing into the more sensitive areas of the site would be removed and the land restored to provide greater ecological and biodiversity value. The historic boathouse in the SW corner of the site, which has been identified as an undesignated heritage asset, could be protected within the proposed buffer zone. Whilst public access would need to be controlled to protect the ecological and biodiversity value of the land and the areas of water, there is no reason why the land management plan for the site could not allow some public access into some parts of the land. Without development, the cost of providing, maintaining and managing these areas for the benefit of the local community cannot be covered and these benefits will not be realised. <u>Sustainability appraisal of the pre-submission publication draft (October 2018)</u> 4.5 On the basis of the new ecological information now received, it is clear that the site should not be scored "major negative" for **biodiversity and geodiversity**. It should in fact be scored "major positive compared to the current situation – development would resolve an existing sustainability problem". 4.6 With regards to **soil and land**, whilst some of the site is greenfield, from the preliminary ecological survey it seems unlikely that the grassland will be of high quality. The land is not being used for any active agricultural use, it is simply mown and maintained. This should not be scored "minor negative" and should be scored neutral. 4.7 Looking at the **water resources and quality, flood risk** objective, the revised proposals for the site, based upon the evidence from Swift Ecology, would leave areas of the site at risk of surface water flooding within the undeveloped parts of the site. Water here would be managed in accordance with more detailed surveys and ecological management proposals that would follow at a more detailed stage of the development process. The water			

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							cycle study flags up capacity issues but this is not unusual for many development sites and is not a reason to preclude development of this land. 4.8 Turning **to landscape and townscape**, the notes recognise that the site is well screened from the A448 and considers that there is potential for adverse impact on views from the adjoining housing estate. There would be no adverse impact on these views. The boundary between these houses and this site is heavily screened year- round by Leyland Cypress that have grown to a height greater than the houses. There are, at most, limited views into this site and, if there are views, these are currently harmed by the substantial areas of hardstanding, the uncompleted extension works to the property at Captains as well as the storage of much domestic paraphernalia and ancillary buildings, and the storage of caravans. There is potential therefore to improve the outlook for any properties that can obtain views into this site through the removal of the existing buildings, caravans and clutter, their replacement with an attractive housing scheme and through the restoration and improvement of the woodland and wildlife areas beyond. This score should therefore be amended from “minor negative” to “major positive compared to the current situation – development would resolve an existing sustainability problem”, now that the Swift Ecology report has demonstrated that development on this site is realistic, subject to standard surveys being carried out. **5. THE TESTS OF SOUNDNESS** <u>Inclusion within Kidderminster East Policy 32</u> 5.1 Paragraph 35 of the Framework 2018 requires, amongst other things, that a plan be “justified”: that there is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. The plan should also be “consistent with national policy”: enabling the delivery of sustainable development in accordance with policies in the Framework. 5.2 In light of the ecological assessment carried out by Swift Ecology, site WFR/ST/1 has been wrongly assessed and should not be excluded from the core housing sites identified by the Council. The objection raised by the Council which has led to this site’s exclusion from the pre-submission publication draft document has been overcome by the evidence provided by Swift Ecology. In other words, the site is not constrained in the manner concluded by the Council. Based upon the evidence now available to the			

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							Council, exclusion of this site would not be justified and fails to meet the guidance in paragraph 35 of the Framework 2018. In this regard the proposed plan is unsound. 5.3 With regards to the removal of the land from the Green Belt, this site meets the considerations set out in paragraph 138 of the Framework. The evidence provided by Swift Ecology demonstrates that "the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt" (para.138). 5.4 The pre-submission publication draft includes a summary of preferred options responses (pp.29-30). These responses included support for re-utilisation of brownfield land and support for concentrating development in and around the main settlements. There was concern for loss of agricultural land and wildlife. 5.5 In light of the evidence from Swift Ecology, concerns regarding impact upon wildlife and valuable agricultural land can be allayed. The amount of land proposed for development (2.6ha) is only slightly more than the existing area of brownfield land (2.1ha) and so development of this site, which is next to the main settlement in the District, would meet a key local objective to minimise development of greenfield sites. In light of the evidence from Swift Ecology, this site should be developed in preference to any greenfield sites within the Green Belt. 5.6 Whilst Council officers' comments have suggested that limited development may still be possible based on existing footprint of development, it would be better to allocate the site to make a more efficient use of land and to enable the "trade" of brownfield land within the site for greenfield land within the site for the best outcomes in landscape/townscape and in ecology and biodiversity impacts. <u>Reserved Housing Sites</u> 5.7 This site should be included in the list of reserved housing sites to meet longer term needs, ahead of the sites identified. Paragraph 7.5 (p.50-51 of the pre-submission publication draft) confirms that the ADR (area of development restraint) sites safeguarded in Policy 7B are all greenfield sites (land removed from the Green Belt to meet longer-term needs). In looking to identify sites, the accepted hierarchy is: • Brownfield sites within urban areas			

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							• Greenfield sites within urban areas • Brownfield sites within the Green Belt • Greenfield sites within the Green Belt 5.8 This is confirmed by paragraph 6.16 of the pre-submission publication draft which advises that the urban areas of the District have the greatest housing needs and are locations where the cost of public service delivery is relatively low. "Accordingly, the bulk of development needs that cannot be met via brownfield land (including brownfield land in the Green Belt) will be via greenfield land release adjacent to the main towns, especially Kidderminster". 5.9 In light of the evidence from Swift Ecology, that ecological and biodiversity matters do not preclude development of this site, site WFR/ST/1 should be included in the list of reserved housing sites, as a brownfield site in the Green Belt, with no known constraints to development ahead of the inclusion of any greenfield sites in the Green Belt. The exclusion of this site is neither justified nor is it consistent with national policy and therefore fails to meet paragraphs 35 and 139 of the Framework 2018 and the plan, in this regard, is unsound. **6. CONCLUSIONS** 6.1 The site was included as a core housing site, with the potential to enhance the landscape by developing land that currently has a minor negative impact within the Green Belt, in the Council's preferred options document. 6.2 The Council's PEA resulted in the Council removing this site from the pre-submission publication draft. 6.3 The new evidence provided by Swift Ecology shows that the Council's position is not justified and, in this regard, the plan is therefore not sound. 6.4 The site should be included within the final version of the pre-submission document sent to the Planning Inspectorate as a site that should be developed for housing. If it is not to be included as land that is deliverable now then it should be removed from the Green Belt and included as a site within the reserved housing sites list, ahead of any greenfield sites.			
Maskery Oliver	LPPS713	Paragraph 32.1		No			I purchased a house on Husum Way just three years ago. In that time the amount of traffic travelling to and from the Birmingham Road has increased dramatically and continues to grow at an	Brownfield and previously developed sites within the town should be the primary source of housing. Beyond	No	

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							alarming rate. Surely the traffic surveys that have been carried out prior to the creation of the Local Plan will have shown this? At peak times it is often difficult to get a car off the drive, which is a ridiculous situation on what was once a relatively quiet residential estate. Screening the new development with planting will not help at all as the added noise and pollution will be coming from the road immediately outside my house. This is to say nothing of the loss of the edge of countryside character of this area which is one of the reasons for buying this property in the first place. The planned development will inevitably have an impact on house prices in this area, particularly for those of us whose homes face or back on to land which is currently agricultural.	that, although developing Lea Castle is regrettable, it appears to be a done deal. Surely such a huge piece of land will accommodate enough houses to meet the quota without having to remove this extensive area of Green Belt as well.		
Shaw Anthony	LPPS728	Policy 32.1		No		Effective	The proposal to build a junction on Husum Way adjacent to Shakespeare Drive is unsafe and unsound. It can only worsen an already overloaded road system. The safest and most expedient solution is to build another road off the proposed Birmingham/Husum roundabout to bridge the railway line and provide a safe connection to Comberton.		No	
Brown Linda	LPPS651	Policy 32.1	Yes	No	Yes	Justified	OC/5 land at Husum Way - this is prime As/3A Agriculure production land with a historic irrigation system installed by Lord Foley many year ago. It should not be taken out of the Green Belt for housing use. OC/12, OC/6 and OC/BN are related to 00/5 as they make up the whole package for Offmore East in the plan. 2% of the Green Belt is needed for Offmore East development this should be disallowed. OC/16 and OC/13N are already in the hands of national housebuilding so delay in building could be the only solutions for these but OC.5 and OC.12 could be permanently saved.	Proposed road off Husum Way should be by a roundabout at Shakespeare Drive junction. Husum Way already a rat run to Spennells and should be closed off at junction of Tennyson Way with access for emergency vehicles only. New road proposed should be full of twists to ensure 20mph requirement met. Tree/hedge bund of 40 metres deep behind existing Offmore estate houses at Munro Close, Rosetti Close, Tennyson Way, Chaucer Crescent, Prior Close and Ashdene Close. This will halt pollution and noise to present homeowners. Alternative site for housing. Sion Hill school site, land at Wolverley Road adjacent to Marlpool Gardens estate, land off Ferndale Estate.	Yes	As my home has been occupied by family members since 1970, I think I have the right to speak up to try to protect it from this disturbance and to protect the Green Belt land it is next to for future members of my family.
Ensor Barry	LPPS680	Policy 32.1	Yes	No	No	Positively Prepared	With Reference to Policy 32.1 Land at Husum Way OC/5 Lines 6 to 10. Together with Policy 32.4 Site Specific Principles of Development. These policy statements should apply equally to the western boundary of the development for exactly the reasons stated in the		No	

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							policy. Further, we would point out that much care has been taken over the outlook and provision of green spaces to enhance wild life corridors along all site boundaries, for houses in the new development, the railway and Hodge Hill Farm. Unfortunately, no provision for similar amenities, are included for existing residents of Husum Way and the many residents of Offmore estate. Therefore, we suggest that for the reasons given in the policy, that at the minimum, a 'buffer strip' of broadleaf, native trees, at a minimum of 25metres in width, should be provided along the eastern edge of Husum Way and the Offmore Estate. The plan calls for such a strip between the new development and the open parkland alongside Borrington road and an extension linking this buffer strip, to those alongside the railway way and around Hodge Hill farm, would provide a continuous wildlife corridor, instead of leaving a huge sterile gap between 2 corridors. As well as greatly enhancing the green space amenity for both the new and existing developments it significantly soften the blow of the loss of Green Belt land, whatever the necessity of this sacrifice. We would question the motives for this neglect of existing voters in local council elections, in favour of home owners that will not be voters for some time and would point out that there may well be "a quid pro quo" to be paid.			
Environment Agency	LPPS969	Policy 32.2 Comberton Lodge Nursery, OC/12		No		Justified Effective Consistent with National Policy	Appears that 0.24ha of site OC/12 falls within a flood zone, however there is no detail on how this site has been assessed, or what modelling has been undertaken.	To seek clarity on the above to inform the deliverability of this site and further development requirements.		
Nixon Francis	LPPS749	Policy 32.2	Yes	No	Yes	Justified	The submission 32.2.2 states that this development will be accessed from the A448. The A448 is kinked at this point, has limited visibility and vehicles travel at speed. To provide an access to a development of this size at this point would be dangerous.	Policy 32.2 - Access will either have to be provided from the spine road proposed for site OC/60 and OC/13N (Policy 32.3) or substantive traffic control measures provided to the A448 access point, e.g. traffic lights.	Yes	These issues are not covered in the submission document.
Edwards Nigel	LPPS688	Policy 32.3		No		Justified	I consider the proposed exit onto Husum Way from the new spine road to be unsound because of limited distance from the crest of the railway bridge to the proposed junction. This would have an adverse effect on motorists coming on to the estate because of short stopping distances, especially in darkness and bad weather conditions. Concern for the safety of pedestrians, particularly school children who regularly use Husum Way and for inexperienced cyclists etc. The junction of Husum Way with the A456 is already notoriously dangerous and the extra volume of traffic from the new spine	In order to make the local plan sound and justified with regard to part B6 I would suggest that the new spine road goes over a new railway bridge onto the A456 and not into Husum Way. I do not think that monetary concerns should come before public safety and a duty of care for local residential. If this is not possible the	No	

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							road will only add to the danger. Concerns that the new spine road will be used as a bypass from the A448 to A456 and a 20 mph speed restriction will be difficult to enforce.	new building should be contained in OC13.N, Stone Hill North, as the access from Spennells island is more compliant.		
Fletcher Adrian and Sandra	LPPS697	Policy 32.3		No		Justified	The land behind the original Offmore Farm building is valuable productive Grade 2 agricultural land. It has an historic irrigation system which was installed by Lord Foley. In these uncertain times does it not make sense to keep our growing lands intact? There are countless areas locally which are totally unsuitable for agriculture would these not be more suitable for development. The proposed new access road from Husum Way onto the new development is unsafe and dangerous.	If the development to the East of Offmore and Comberton does take place then the new access road proposed for Husum Way needs to be moved. It should be situated opposite Shakespeare Drive and include a small island to make it safer for both traffic and pedestrians. It should not be a continuous route through the development as you would be creating a 'rat run' which would not be acceptable to new families wishing to buy. A tree bund of 20 to 50 metres should be created around the field at the back of existing properties. This would help reduce the pollution from all of the extra traffic which will be using the new road off Husum Way. We live in a small unique courtyard environment surrounded by fields. there are no street lights at all so a bund of trees and bushes would help reduce the noise and light pollution for all of the existing residents and would also protect the new properties from being overlooked. It would also go a little way to protect the abundant wildlife around the old Offmore Farm buildings which includes Offmore Court. We have badgers, foxes pheasants, owls, bats and abundant birdlife. Some land which might be of interest for development as it is not used for agriculture is land either side of the Bridgnorth Road between low Habberley, Franche and Fairfield. It	No	

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								has existing road access to both the A442 and A449.		
Parker Michael	LPPS29	OC/6 Kidderminster East	Yes	No	Yes	Effective	I believe the Local plan not to be sound on the grounds that it does not carefully consider the impact of the proposals on existing residential areas which abuts the land in question. Neither have the planned access/egress for the new road been carefully considered.	Part OC/6 shows the proposed development boundary marked in red as abutting the existing property boundaries to the east of Offmore Estate. Yet the rest of the proposal clearly shows large swathes of greenery as a clear buffer. This is particularly noticeable along the Stone Hill OC/13N section which clearly has much less residential abutments. The same is obvious near the Offmore Residential home and the adjoining barn conversions. Why are these areas being protected and not the majority of others? The existing land immediately adjacent to the rear of Prior Close on the east of Offmore is already elevated at about 1.5 metres at the point it abuts existing gardens. The field then rises in both an easterly and northerly direction. Development in this area will have a significant impact upon the quality and wellbeing of the existing residents because any new housing will be at a much higher level and result in severe overlook from the new properties. WFDC should amend this on OC/6 and outline what assurances will be in place to ensure that future development does not have any detrimental impact upon those residents affected in this way. OC/13N lends itself more suitable to development because it is in a low lying area which will not have the same impact on existing properties. OC/6 should include a very substantial way leave in parity with the Stone Hill North as an absolute minimum. The proposed access/egress of the new road is in a dangerous position which is close to the summit of a railway bridge at	No	

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								Husum Way. It is clear that the authorities are making this fit in order to avoid the original proposal to link up with the A456, which would have had to include crossing the existing rail network. Costs are taking precedence over safety. The data put forward by WFDC in terms of future housing requirement is in direct contradiction of the actual population growth recorded over the recent decade. The actual population has risen at a much lower rate than the forecast for future housing would have us believe, and as such the numbers proposed for housing on OC/6 should be reduced to reflect the factual reality.		
CORE11	LPPS90	32.3 0C/6	Yes	No	No	Consistent with National Policy	This part of the plan [32.3] is not sound as it has fundamental faults regarding site description and plan. At pedestrian cycle and pathways from the new developments to existing Comberton estate is shown through Offmore park {wrongly named Borrington park Terminating at Tennyson way on Offmore Farm estate, this is none compliant with the development plan 2016-2019 , The correct location should be from the new estate to Comberton Estate. This would be in Offmore park adjacent to the Comberton allotments which are on the Comberton Estate, then to Borrington road on Comberton Estate. The new Offmore cycle and pathway for Offmore from the new development is shown correctly as per the policy 32.3 OC/6. It should be noted that there are no Comberton properties on the Offmore part of Borrington road. This point should be visited by WFDC			
Smith Laila	LPPS646	Policy 32.3	Yes		Yes	Justified	My general concern is that the burden of new housing developments in the WFDC area need to be shared across the area and not entirely along the eastern boundary of Kidderminster, only including the Comberton and Offmore areas, which is essentially Green Belt land currently used as arable land growing essential food crops. Whilst I understand the need for development and that inevitably this land will eventually be developed as an expansion of Kidderminster, the immediate development I feel should take into account previously developed land of other areas in Kidderminster, including the following: Lea Castle hospital site, the former school sites of Sion Hill and	• It is understood that the developer is anxious to commence building as soon as possible. I would urge you to consider all the other possible brown field available sites before this is allowed. • The former Lea Castle hospital site near Cookley, which is already earmarked for a development of 600 dwelling will put pressure on	No	

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							Sladen and also the empty buildings along the canal behind Matalan. Once the empty shops in Kidderminster have been regenerated then the space above these stores could also be converted in to flats. Offmore Court is a small unique development of seven homes, which are the converted, former farm buildings, dating back to the late 1800's, situated at the rear of the Offmore Farm Care Home. This development was completed in the mid 1990's and is surrounded on three sides by Grade 2 agricultural farmland. The fields surrounding the development have been used on a continuous basis, to grow crops (originally sugar beet, until the Kidderminster sugar beet factory closed down) and latterly wheat, potatoes, carrots etc). The land is considered as by far the most productive. It also has an irrigation system allowing the crops to be watered during prolonged dry spells. This land is far more productive than much of the land to the east of Spennells and Baldwin Road, as an example.	the existing facilities in Cookley namely the primary School and doctor's surgery. If this site was to be extended to include the land up to the Wolverhampton Road and then Axborough Lane at the rear of the Lea Castle site, then this would enable around 2,000 dwellings to be built. The development would then be a sustainable community and be eligible for its own school, bus service and doctor's surgery, taking the pressure off the village of Cookley. As this area is on the other side of the A449 and already well screened by woodland it would not have a significant visual impact on the village. It would then also be in the catchment area for Wolverley CE High School. • That regular (every 5 or 10 years) assessments are carried out concerning the need for additional housing in the Kidderminster area as there has been little or no increase in the population of Kidderminster over the past twenty years. • Should the need for extra housing be significantly less than the estimated population growth then the valuable agricultural land earmarked for development should be optimised and continue to provide much needed food produce and reduce the need to import food from elsewhere. As we all know once arable land is developed for housing there		

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								is no going back! • That consideration is given to the effect of flooding of the stream which flows from the eastern direction and along the edge of the Offmore estate towards Spennells. Currently any rainfall is absorbed by the land but when this land is developed there will be significant run-off as the land available for natural drainage will be greatly reduced. • There have been occasions during heavy rainfalls that there has been flooding from the field into Offmore Farm Close. • That the unique nature of the Offmore Court development is respected and an area of undeveloped land should be allowed to remain around the development to enable its unique character to be retained as the buildings have a certain 'group value' and that their setting as former farm buildings should be treated sympathetically in any future Master Plan. This specifically should include the land between the barn and the abandoned Nissan hut as far as the vertical drops to the east and south of the Offmore Court corn m unity. • In order to protect the amenity of existing residents on the east of Offmore any new development would need to be separated from the backs of existing residents by a bund of trees at least 20 metres deep,		

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								which would absorb pollution from the new proposed road and would also absorb sound whilst also helping to protect our existing semi-rural situation; this must include land to the rear of Offmore Court. • There is an active badger set in and around the Nissan hut and skylarks regularly nest in the field to the north of Offmore Court. • Consideration must be given to the junction of the proposed access road to the proposed development and Husum Way. This will be very busy and safety measures must be adequate. • The proposed access road to the proposed development must not be continuous between Husum Way and Comberton Road. It should be closed off at the stream and only emergency vehicles should be allowed full access by the use of Rising Bollards. • In addition the access road to the proposed development must not be straight but be allowed to snake through the development with a number of twists and turns included, to prevent excessive speeds even though it is supposed to have a 20mph speed limit.		
Folkes Kevin	LPPS650	Policy 32.3					My main objection to this plan is the access off Husum Way is totally inadequate it is a blind spot over the bridge and the build up of traffic to and from Birmingham Road will cause severe tail backs and possible accidents. • The Green Belt to the east of Kidderminster plays a vital part in separating the town from the West Midlands Conurbation. We already see major development at Hagley and any development		No	

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							between our area and Blakedown can only contribute to closing that gap. • The land in question is Grade 2 Agricultural Land. With the uncertainty surrounding food prices post Brexit it is vital that such land is kept available for food production. Ironically this still holds true and we are aware that the land to the east of Offmore and Comberton, which is easily irrigated and is most productive is being taken for housing whilst the less productive land known as Spennells Fields is being “saved” even though it is poor quality and without irrigation! We accept, however, that whilst development to the East of Offmore and Comberton can take place WITHOUT development East of Spennells, development, East of Spennells is less easily developed without development East of Offmore and Comberton. However IF the development to the East of Offmore and Comberton is to take place, the following alterations to the proposals are essential: • The proposed access road off Husum Way it far too dangerous and MUST be altered. • Access to the new road must be from a point opposite the junction with Shakespeare Drive, preferably via a traffic island. • The new spine road must NOT give a continuous road link from Husum Way to Comberton Rd. for ordinary traffic; if it is a continuous route it WILL be used as a “rat run” and will become an unofficial “by pass”. We propose that at the point where the new road crosses the brook via a bridge one of the following 2 options should be chosen: Either: A. the road should be closed at either side of the bridge (creating effectively two cul-de-sacs) and a narrow Pedestrian and Cycle ONLY bridge should be created. OR B. IF the bridge MUST be suitable for vehicles to access then it must ONLY be accessible for emergency service vehicles (and possibly buses) via rising bollards which would prevent access by private cars, vans etc. • In order to support a proposed 20mph limit on the “spine road”, that road should snake through the development with far more twists and turns! Whilst the proposed new development has plenty of tree cover, very little thought appears to have been given to protection of the environment for existing residents. We therefore propose: • A tree “bund” at least 20 metres deep should be provided along the boundary of the existing Offmore development i.e. behind: all existing properties and cul-de-sac end at : Husum Way, Munro Close, Rosetti Close, Tennyson Way, Chaucer Crescent, Prior Close and Ashdene Close. • A similar tree “bund” MUST also be provide at the rear and side			

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							of Offmore Farm Residential Home and the barn conversion development at Offmore Court, this could perhaps be by an extension of the proposed Community Orchard. We believe that, as the land behind the current existing Offmore estate rises sharply and is visible from a distance, whilst the land behind Heathy Mill Farm is low lying, the bulk of the proposed new housing MUST be in the low lying ground which is the “Stone Hill North” area. We accept that our proposals MAY lead to a smaller development but believe that any “missing” homes can easily be provided by for example utilising the additional land at the former Sion Hill School site which is currently to be “reserved for future housing” and if necessary the land at Captains on the Comberton Rd.			
Kettle Anthony and Norma	LPPS655	Policy 32.3		No		Justified	This land was proposed prior to Brexit and the follow on demand for self sufficiency farming throughout the country. The land is virtually inaccessible Green Belt irrigated agricultural farmland, with no public right of way, and is still proposed for development whereas accessible Green Belt land, albeit agricultural, is saved due to 'listed' nesting birds equating to bird life being more important than human life. We have lived here for forty seven years and excepting for two/three years 'set aside', arable or vegetable crops have been harvested annually. Safe accessibility to the development a major concern. This proposed new road off Husum Way veers off to the left down a steep embankment almost immediately after the crest of a blind spot railway bridge. Existing from this junction would be an accident waiting to happen as, although a 30 mph limit, without accelerating, acceleration is automatic descending the hill meaning lower gear/braking almost always necessary. Near the bottom of the hill at Shakespeare Drive and road curves to the right. Husum Way, Tennyson Way and Borrington Road are used as a 'cut through' both by cars and lorries, which relieves Chester Road South, and with extra new development traffic of unknown quantity, road calming measures have adverse effects on residential passengers with skeletal problems. Currently plans show no consideration or division between the old and new developments. A 'corridor' for all aspects of farmland and marshland wildlife, between the two developments, say thirty metres wide, should be considered, along with the renewal of	1. We oppose the suggestion of a roundabout of Husum Way/Shakespeare Drive and propose that all new development traffic uses the Comberton Road entrance only. Public footpaths could be incorporated for the 'top' development for access to Offmore shops, church, bus route etc. 2. Should it be necessary to risk a Husum Way approach road this must be restricted for the use of the 'top end' development only at the Hoobrook marsh land area a small crossing for walking/cycling only, but sufficiently wide for emergency and disability transport only. Thus making the development a more 'exclusive, quiet and private' area. 3. Should there be a loss of dwellings due to a 'wildlife corridor' we understand there are other designated areas to take up the shortfall. 4. If the proposed Local Plan for this area is accepted has the extra traffic on the Comberton Road, especially at	No	

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							existing boundary fencing. Has a flood risk been examined? No mention has been made for compensation for loss of semi-rural house value, already being experienced by properties for sale on the boundary of this previously sought after area.	the Chester Road South junction and particularly at the varying peak times, been fully considered, including the creation of a third lane specifically for traffic turning right?		
Nixon Francis	LPPS750	Policy 32.2	Yes	No	Yes	Justified	The main access would be off Spennells Valley roundabout. the submission already states at para 13.3 "... the A448 between Kidderminster and Bromsgrove suffer from significant congestion during peak times." This proposal will only exacerbate this problem. The access road serving the new development may also be used as a through route worsening congestion. The submission clearly acknowledge that the eastern extension of the town together with infill development will only make congestion worse. The plan states that new ways of travel will be required but beyond vague aspirations fails to mention any solutions to address the problem. The same is true of the Worcestershire Local Transport Plan.	The submission needs to address how the problem of increased traffic congestion as the result of the plan will be addressed. This needs to include road improvement proposals within the town including, segregated cycleways. Consideration of a by-pass to Kidderminster. The enhancement of bus services to include evening and weekend provision as well improved rail services including improvement in time taken to Birmingham. In the vicinity of the Spennells Valley Road the following road junction pinpoints needs to be addressed in the light of the increased traffic. Improvement of the current A448 and Spennells Valley Road is already congested and dangerous. There needs to be a provision for traffic lights or a further roundabout to deal with the increased traffic flows along Spennells Valley Road. Roundabout at the junction of Chester Road South, Spennells Valley Road and the Viaduct Trading Estate. This junction is congested and has inconsistent filtering lanes coming from Worcester Road direction which pose a danger on the island itself. The island needs to be redesigned with the provision of traffic lights. Roundabout at the junction of the Worcester Road, Wilden Lane and Chester Road South. This is heavily congested and dangerous. New approach lanes need to be provided together with the consideration of traffic signals. Finally steps need to be taken to prevent the spine road	Yes	These issues are not covered in the submission document.

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								serving sites OC/60 and OC/13N being used as a "rat run"		
Pratt Stephen	LPPS699	Policy 32.3	Yes	No	Yes	Positively Prepared Justified Effective	Proposed new road access to OC/6 would be irresponsible and dangerous. Proximity to existing railway bridge would create a 'blind' junction with reduced visibility for approach traffic. Convergence of additional traffic onto already over used Husum Way and Birmingham Road would create congestion and safety issues.	Any proposed new road to the east of Offmore should like Spennells Valley Road/A448 Comberton Road roundabout DIRECTLY to Birmingham road A456. This road would then become an eastern ring road to help divert traffic away from town centre and reduce traffic through Comberton/Offmore estate.	No	
Environment Agency	LPPS970	Policy 32.3, Land East of Offmore (OC/6) and Land at Stone Hill North (OC/13N)		No		Justified Effective Consistent with National Policy	Some watercourses and ditches have not appeared to have been picked up in the SFRA appraisal for this site. Policy 9. Could be amended to included: The Hoo Brook and its tributaries will require an ecological buffer to protect existing wildlife, as well appropriate 'blue infrastructure' enhancements.	We note that this is a large development with an Ordinary Watercourse (Hoo Brook) which flows across the site from east to west. Some smaller watercourses/ditches don't appear to have been picked up in the SFRA appraisal? Although the site is primarily in Flood Zone 1 here we would seek flood risk reduction/betterment. We would support the ecological enhancements in Policy 32.3, points 5,8,9. Point 9. Could be amended to include: The Hoo Brook and its tributaries will require an ecological buffer to protect existing wildlife, as well appropriate 'blue infrastructure' enhancements including flood storage reduction measures where possible. We acknowledge point q which states – Further detailed hydraulic modelling will be required to confirm actual floodplain extent The brook along the western boundary currently discharges into a culvert under the A448. Improvements to the		

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								watercourse should be sought as part of any road proposals to improve species migration between the nature reserve and the wet woodland corridor.		
Taylor Wimpey West Midlands	LPPS1010	Policy 32.3		Yes			Policy 32.3 relates to the sites under the control of Taylor Wimpey. The overall vision is supported and reflects the emerging proposal for the site as introduced through the Development Vision document appended to this representation		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
CORE11	LPPS91	32.4	Yes	No	No		This part of the Development Plan 2016-2019 which has overriding SUDS ISSUES as noted in the policy specific principles, New developments will combine with adjacent areas that are within the same Riparian Rights responsibilities. Pathways in some parts could be adversely affected by poor drainage The Lord Foley irrigation plan plus Riparian Right responsibilities, by existing land owner, or managers must be addressed immediately.	The proposed Masterplan will be needed urgently so that sound infrastructure can prove a benefit to existing drainage and wildlife. Open space and play areas with other outdoor functions ,which have been allocated 50% of some sites, prioritise the SUD`s issue.	No	
Ensor Barry	LPPS681	Policy 32.4	Yes	No	No	Positively Prepared	With Reference to Policy 32.1 Land at Husum Way OC/5 Lines 6 to 10. Together with Policy 32.4 Site Specific Principles of Development. These policy statements should apply equally to the western boundary of the development for exactly the reasons stated in the policy. Further, we would point out that much care has been taken over the outlook and provision of green spaces to enhance wild life corridors along all site boundaries, for houses in the new development, the railway and Hodge Hill Farm. Unfortunately, no provision for similar amenities, are included for existing residents		No	

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							of Husum Way and the many residents of Offmore estate. Therefore, we suggest that for the reasons given in the policy, that at the minimum, a 'buffer strip' of broadleaf, native trees, at a minimum of 25metres in width, should be provided along the eastern edge of Husum Way and the Offmore estate. The plan calls for such a strip between the new development and the open parkland alongside Borrington road and an extension linking this buffer strip, to those alongside the railway way and around Hodge Hill Farm, would provide a continuous wildlife corridor, instead of leaving a huge sterile gap between 2 corridors. As well as greatly enhancing the green space amenity for both the new and existing developments it significantly soften the blow of the loss of Green Belt land, whatever the necessity of this sacrifice. We would question the motives for this neglect of existing voters in local council elections, in favour of home owners that will not be voters for some time and would point out that there may well be "a quid pro quo" to be paid.			
Worcestershire Wildlife Trust	LPPS342	Policy 32.4 Site specific principles of development	Yes	Yes	Yes		The WWT consider that the policy is both legally compliant and sound.		No	
Taylor Wimpey West Midlands	LPPS1011	Policy 32.4		Yes			Policy 32.4 is supported by Taylor Wimpey as 'sound.' Work has been undertaken to demonstrate how these principles can be incorporated within a deliverable scheme. These principles underpin the Framework Development Plan introduced through the Development Vision document.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan. Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Maskery Kim	LPPS724	Paragraph 32.1		No			The land to the East of Offmore is completely unsuitable for development. There is already a disproportionate amount of	If Lea Castle is developed sensitively but to its full potential it would	No	

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							traffic going through the Offmore Estate via Husum Way which is the proposed access point for the suggested housing scheme. Any new development on this scale needs to have a self-sufficient infrastructure and have easy access to main roads without impacting on existing local community traffic. The Lea Castle development will remove a sizeable area of what is currently Green Belt land but, if Green Belt land is to be used, it makes sense to utilise it fully, creating a single self-contained village rather than taking numerous swathes of rural land from around the town with the prospect of these areas eventually homogenizing.	certainly accommodate enough homes to make it unnecessary to build on land designated as OC/6/		
Maskery Richard	LPPS729	Paragraph 32.1		No			I strongly believe that the current Local Plan proposals concerning development of land to the East of Kidderminster area are unsound, impractical and contrary to the best interests of the town. The council has a duty to protect Green Belt land and only use it for development as a last resort. With the present number of "brownfield" and previously developed sites available within the town, further expansion into the rural areas to the East is unnecessary and sets a dangerous precedent for the future. With space available for dwellings on sites such as Churchfields (231 homes), Limekiln Bridge (80), Silverwoods (59+) and Sion School (59) it is inconceivable that so much Green Belt land should be earmarked for housing. The planned Lea Castle development raises concerns of its own but is more practical in that it promises a self- contained community. With such a large scale development already rubber-stamped, it is hard to believe that so much other undeveloped land is being set aside as part of the proposal. The land to the East of Offmore is unsuitable for development for a number of reasons: 1. There is already too much traffic passing through the estate. This has increased dramatically within the last two years (possibly following roadworks within the town) and drivers are not discouraged by existing speed ramps. The volume of traffic that passes along Husum Way at peak times makes it unsuitable for a junction with the proposed new development at any point. If a new primary school is to be included within this development this problem would escalate, with those travelling to or from the new school having to merge with existing school traffic at key junctions. 2. Even now, Offmore is a large estate. Extending it further creates the kind of "urban sprawl" that most councils are looking to avoid in order to protect the welfare of the	The land to the East of Offmore OC6 should be removed from the local plan on the basis that, combined with full utilisation of land available at Lea Castle, there are adequate sites within the town that will accommodate a sufficiently high level of housing to make the removal of this area from Green Belt and subsequent development both unnecessary and detrimental to the town as a whole. Instead, the following areas should be used a primary stage of housing allocation: • Churchfields Site ref BW/1 231 dwellings • Silverwoods Phase 1 ref FPH/23 59 dwellings • Silverwoods Phase 2 ref FPH/10 58 dwellings Sion Hill School ref WFR/WC/18 56 dwellings	No	

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							population. Adding another layer of residential development to an area of already extensive housing will create a mini-town but without the infrastructure to support it. 3. Development to the OC/6 area would be highly visible. The land rises to the East with the trees and fields providing an historic and important vista for both residents and visitors. Any housing here would be very prominent and detrimental to the overall appearance and perception of this side of the town. It should be noted that these factors were instrumental in ruling out the Baldwin Road development. 4. Furthermore, the longstanding perception of Kidderminster is that of a country town. People who move here, particularly to this part of town are not doing so for employment — most work further afield - but because of its close proximity to the countryside. Extending the town will erode this character and impact upon the rural gateway that welcomes visitors to the town and its major attractions — the Safari Park and Severn Valley Railway - both of which are best served by more rural surroundings. 5. Some of the land east of Offmore is Grade 2 agricultural land which will become increasingly important in years to come. Once it has been developed it will never be reclaimed for this purpose again. 6. The amount of green buffering required to absorb the increase in noise and pollution (I would suggest at least 20 metres) would significantly reduce the area available for housing and make any development to the east of Offmore unviable. The housing quota is supposedly based upon an anticipated growth in population. Global population is falling, UK population growth has slowed and even the most recent Wyre Forest figures show a reducing figure. Social changes indicate that this trend is likely to continue and therefore the quota is likely to need revising in the near future. It makes complete sense to only use allocated sites within the town for the foreseeable future and review the housing requirement again in years to come.			
CORE11	LPPS75	32,0. 1	No	Yes	Yes	Consistent with National Policy	This part of the submission plan is unintentionally not conforming to the LDF as adopted . The reason for this is that the complexity and timescale of the various developments are inevitably connected. Each development cannot be treated as a stand alone	The addition of a notice referring to a possible number of SPD`s relating to a particular development; as apposed to a general SPD, may avoid local	No	

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							project. The general public will have to be informed that the parameters and time targets will need to be flexible, otherwise different services and project fabric, will be frustrated..	concerns , should changes be necessary. The SPD`s should be produced as quickly as possible when required.		
CORE11	LPPS82	32.2	Yes	No	Yes		The Husum way development OC/5 s not positively prepared; It will be accessed from a new island no detail. OC/6 is not justified, it shows the north side of the development having a new road giving access from Husum Way. The problems are it also travels through the eastern extension as per 0C/6, down to Spennells Valley island. This will create a mini Kidderminster bypass from Birmingham Road to Stourport, with all that comes with extra traffic. This northern end should be accessed from Husum Way as per the documents but only as far as the lower Dunclent Brook, [wrongly name Hoo Brook] If houses are built near the brook. The rest of the eastern 0C/6 development should then be accessed from the Spennells Valley island as shown in the documents. This also relegates a road bridge over the Dunclent Brook, to a cycle and footpath bridge.		No	
Maskery Oliver	LPPS714	Paragraph 32.2		No			I purchased a house on Husum Way just three years ago. In that time the amount of traffic travelling to and from the Birmingham Road has increased dramatically and continues to grow at an alarming rate. Surely the traffic surveys that have been carried out prior to the creation of the Local Plan will have shown this? At peak times it is often difficult to get a car off the drive, which is a ridiculous situation on what was once a relatively quiet residential estate. Screening the new development with planting will not help at all as the added noise and pollution will be coming from the road immediately outside my house. This is to say nothing of the loss of the edge of countryside character of this area which is one of the reasons for buying this property in the first place. The planned development will inevitably have an impact on house prices in this area, particularly for those of us whose homes face or back on to land which is currently agricultural.	Brownfield and previously developed sites within the town should be the primary source of housing. Beyond that, although developing Lea Castle is regrettable, it appears to be a done deal. Surely such a huge piece of land will accommodate enough houses to meet the quota without having to remove this extensive area of Green Belt as well.	No	
Maskery Kim	LPPS725	Paragraph 32.2		No			The land to the East of Offmore is completely unsuitable for development. There is already a disproportionate amount of traffic going through the Offmore Estate via Husum Way which is the proposed access point for the suggested housing scheme. Any new development on this scale needs to have a self-sufficient infrastructure and have easy access to main roads without impacting on existing local community traffic. The Lea Castle development will remove a sizeable area of what is currently Green Belt land but, if Green Belt land is to be used, it	If Lea Castle is developed sensitively but to its full potential it would certainly accommodate enough homes to make it unnecessary to build on land designated as OC/6/	No	

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							makes sense to utilise it fully, creating a single self-contained village rather than taking numerous swathes of rural land from around the town with the prospect of these areas eventually homogenizing.			
Underhill Mattie	LPPS40	Land at Husum Way (OC/5) 2.1Ha	Yes	No	Yes		I am concerned about both the junctions set out on Husum Way as being unsafe to traffic.The one half-way down the junction is too close to Shakespeare Drive and the railway bridge. Visibility is already poor; this plan is an accident waiting to happen.	Roundabouts, traffic lights or other calming measures are required at both the top junction with Birmingham main road and where the new service road (which may become a 'rat run' off the Birmingham Rd) meets Husum way. The speed limit on the Birmingham Road is 40 mph and cars travel very fast where there is the poor visibility, although the actual speed limit is, of course, then 30 mph. Many young children use the same roads as a walking route to primary school and have to cross these dangerously planned roads.	No	
Maskery Richard	LPPS730	Paragraph 32.2		No			I strongly believe that the current Local Plan proposals concerning development of land to the East of Kidderminster area are unsound, impractical and contrary to the best interests of the town. The Council has a duty to protect Green Belt land and only use it for development as a last resort. With the present number of "brownfield" and previously developed sites available within the town, further expansion into the rural areas to the East is unnecessary and sets a dangerous precedent for the future. With space available for dwellings on sites such as Churchfields (231 homes), Limekiln Bridge (80), Silverwoods (59+) and Sion School (59) it is inconceivable that so much Green Belt land should be earmarked for housing. The planned Lea Castle development raises concerns of its own but is more practical in that it promises a self- contained community. With such a large scale development already rubber-stamped, it is hard to believe that so much other undeveloped land is being set aside as part of the proposal. The land to the East of Offmore is unsuitable for development for a number of reasons: 1. There is already too much traffic passing through the estate. This has increased dramatically within the last two years (possibly following roadworks within the town) and drivers are not discouraged by existing speed ramps. The volume of traffic that passes along Husum Way at peak	The land to the East of Offmore 00/6 should be removed from the local plan on the basis that, combined with full utilisation of land available at Lea Castle, there are adequate sites within the town that will accommodate a sufficiently high level of housing to make the removal of this area from Green Belt and subsequent development both unnecessary and detrimental to the town as a whole. Instead, the following areas should be used a primary stage of housing allocation: • Churchfields Site ref BW/1 231 dwellings • Silverwoods Phase 1 ref FPH/23 59 dwellings • Silverwoods Phase 2 ref FPH/10 58 dwellings • Sion Hill School ref WFR/WC/18 56 dwellings	No	

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							times makes it unsuitable for a junction with the proposed new development at any point. If a new primary school is to be included within this development this problem would escalate, with those travelling to or from the new school having to merge with existing school traffic at key junctions. 2. Even now, Offmore is a large estate. Extending it further creates the kind of "urban sprawl" that most councils are looking to avoid in order to protect the welfare of the population. Adding another layer of residential development to an area of already extensive housing will create a mini-town but without the infrastructure to support it. 3. Development to the OC/6 area would be highly visible. The land rises to the East with the trees and fields providing an historic and important vista for both residents and visitors. Any housing here would be very prominent and detrimental to the overall appearance and perception of this side of the town. It should be noted that these factors were instrumental in ruling out the Baldwin Road development. 4. Furthermore, the longstanding perception of Kidderminster is that of a country town. People who move here, particularly to this part of town are not doing so for employment — most work further afield - but because of its close proximity to the countryside. Extending the town will erode this character and impact upon the rural gateway that welcomes visitors to the town and its major attractions — the Safari Park and Severn Valley Railway - both of which are best served by more rural surroundings. 5. Some of the land east of Offmore is Grade 2 agricultural land which will become increasingly important in years to come. Once it has been developed it will never be reclaimed for this purpose again. 6. The amount of green buffering required to absorb the increase in noise and pollution (I would suggest at least 20 metres) would significantly reduce the area available for housing and make any development to the east of Offmore unviable. The housing quota is supposedly based upon an anticipated growth in population. Global population is falling, UK population growth has slowed and even the most recent Wyre Forest figures show a reducing figure. Social changes indicate that this trend is likely to continue and therefore the quota is likely to need revising in the near future. It makes complete sense to only use allocated			

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							sites within the town for the foreseeable future and review the housing requirement again in years to come.			
Sport England	LPPS273	Policy 32.3		No		Positively Prepared Consistent with National Policy	Sport England considers that the development of over 1400 dwellings in this allocation should make appropriate provision for new outdoor sports and recreation facilities to meet the needs of the proposed development, given the evidence in the Playing Pitch Strategy that there are current shortfalls of provision for football and rugby union and the evidence in the Built Sports Facilities Strategy regarding the need for investment in sports facilities within the catchment of this development.	Amend policy 32.3 to include the provision of on-site playing fields to meet the needs of the development in accordance with policy 20C, or to require an equivalent contribution for off-site investment in accordance with policies 12 and 20C and the evidence in the Playing Pitch Strategy. Include provision for an off-site contribution towards built sports facilities in accordance with policies 12 and 20C and the evidence in the Built Sports Facilities Strategy. This will ensure that new sports and recreation facilities are suitably secured in accordance with policy 96 of the NPPF and the evidence set out in the Playing Pitch Strategy.	Yes	
Newbold Philip	LPPS140	32.3	Yes	No	Yes	Justified	The eastern boundary of Kidderminster should not be moved towards Blakedown, Alternatives are available such as Spennells Fields		No	
Milligan Robert	LPPS693	Policy 32.3	No	No		Justified Effective	My main reason as to why the Local Plan is unsound is because it is going to be built on existing Green Belt land. This is particularly relevant to the proposed housing development on land to the east of Offmore and Comberton. This Green Belt land surely must be protected as it is productive grade 2 agricultural land. The east of Offmore agricultural land should surely be only available for food production and wildlife conservation. With the uncertainty of Brexit the need to produce our own home grown sustainable food is even more pressing. There are other vacant existing sites both brownfield and lower grade agricultural land that are available for housing in and around the Wyre Forest District. These sites have been mentioned in the leaflet produced by the 'Offmore Comberton Action Group Local Plan (OCAG-LP) a copy of which I have enclosed in my letter.	We are constantly being warned by politicians, scientists or various self appointed green eco-warriors about the disastrous consequences of global warming and the different forms of air or land pollution. Building more homes on productive Green Belt land only adds to the problem as well as the erosion of our beautiful precious countryside. As an existing resident protection to the environment in the form of a 30 metre tree "bund" along the boundary of the development is essential. To combat global warming tree planting in the UK must double by 2020 according to the Committee of Climate Change (CCC). This tree barrier would not only absorb noise, water and air pollution, but be beneficial to wildlife and	No	

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								conservation in general. Finally, I wish to give my full support to the OCAG-LP because I agree with everything that they suggest in their leaflet. As far as I am concerned they speak for me. Please consider the arguments and save our national treasure. The English Countryside.		
Sport England	LPPS276	Policy 32.4		No		Positively Prepared Consistent with National Policy	Sport England considers that the development of over 1400 dwellings in this allocation should make appropriate provision for new outdoor sports and recreation facilities to meet the needs of the proposed development, given the evidence in the Playing Pitch Strategy that there are current shortfalls of provision for football and rugby union and the evidence in the Built Sports Facilities Strategy regarding the need for investment in sports facilities within the catchment of this development.	Amend policy 32.4 to include the provision of on-site playing fields to meet the needs of the development in accordance with policy 20C, or to require an equivalent contribution for off-site investment in accordance with policies 12 and 20C and the evidence in the Playing Pitch Strategy. Include provision for an off-site contribution towards built sports facilities in accordance with policies 12 and 20C and the evidence in the Built Sports Facilities Strategy. This will ensure that new sports and recreation facilities are suitably secured in accordance with policy 96 of the NPPF and the evidence set out in the Playing Pitch Strategy.	Yes	
Powell David	LPPS11	Table 32.0.1	Yes	Yes	Yes		I support this plan which allows Spennells Fields to remain out of consideration for housing. My reasons for supporting the Spennells Fields remaining out of the housing plan are:- 1 .Any future housing should not be built on Green Belt land as specified in the planning guidelines. 2. Building on Spennells Fields would endanger the wildlife habitat and would result in a loss of productive agricultural land. 3. There would also have to be an exit on to the A449 which would add to an already congested road and would presumably require a new bridge over the railway line, at huge expense. 4. On a personal basis, this would affect my well-being as I am a very active walker and cyclist and cross these fields several times a week. It is so lovely to be able to reach the countryside in a couple of minutes from leaving my house door.			
CORE11	LPPS81	Table 32.0.1	No	No	No		This part of the document refers by way of a list only therefore rendering it , IMPOSSIBLE TO COMMENT		No	
Smith Peter	LPPS48	Policy 32-	Yes	No	Yes	Justified	My general concern is that the burden of new housing	Consideration is given to the effect of	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
		Kidderminster Eastern Extension					developments in the WFDC area need to be shared across the area and not entirely along the eastern boundary of Kidderminster, only including the Comberton and Offmore areas, which is essentially Green Belt land currently used as arable land growing essential food crops. Whilst I understand the need for development and understand that inevitably this land will eventually be developed as an expansion of Kidderminster, the immediate development I feel should take into account previously developed land of other areas in Kidderminster, including the following: Lea Castle hospital site, the former school sites of Sion Hill and Sladen and also the empty buildings along the canal behind Matalan. Once the empty shops in Kidderminster have been regenerated then the space above these stores could also be converted in to flats. Suggestions and proposals concerning the WFDC Proposed Housing Development on the East side (Offmore) of Kidderminster. The fields surrounding the development have been used on a continuous basis, to grow crops (originally sugar beet, until the Kidderminster sugar beet factory closed down) and latterly wheat, potatoes, carrots etc). It also has an irrigation system allowing the crops to be watered during prolonged dry spells. This land is far more productive than much of the land to the east of Spennells and Baldwin Road, as an example. As and when the development of the fields adjoining Offmore Court takes place we would like to suggest the following: • That consideration is given to the effect of flooding of the stream which flows from the eastern direction and along the edge of the Offmore estate towards Spennells. Currently any rainfall is absorbed by the land but when this land is developed there will be significant run-off as the land available for natural drainage will be greatly reduced. • There have been occasions during heavy rainfalls that there has been flooding from the field into Offmore Farm Close. • That the unique nature of the Offmore Court development is respected and an area of undeveloped land should be allowed to remain around the	flooding of the stream at Offmore Court. That the unique nature of Offmore Court development is respected. That a minimum 50 metre buffer zone is established between the existing Comberton developments and the proposed build area. Consideration must be given to the junction of the proposed access road to the proposed development and Husum Way. Access road to be built with curves to prevent excessive speed. To consider other brownfield sites before Lea Castle site is allowed. That regular 5 to 10 year assessments are carried out concerning the need for additional housing. If housing is significantly less than the estimated growth then the land should be used for agriculture.		

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							development to enable its unique character to be retained as the buildings have a certain 'group value' and that their setting as former farm buildings should be treated sympathetically in any future Master Plan. This specifically should include the land between the barn and the abandoned Nissan hut as far as the vertical drops to the east and south of the Offmore Court community. • That a minimum 50m buffer zone is established between the existing Comberton developments and the proposed build area. This could easily be attained by reducing the proposed green area at the far east end of the field where there are no existing properties. • There is an active badger set in and around the Nissan hut and skylarks regularly nest in the field to the north of Offmore Court. • I am concerned about the future of the existing lane from Offmore Farm Close to the Offmore Court community. Ideally the Offmore Court community would like to take ownership of this track and be entirely responsible for its upkeep. We do not foresee the local authority wishing to adopt this. It is our one and only access to our properties and we do not wish for a third party owning it and imposing conditions for its use. • Consideration must be given to the junction of the proposed access road to the proposed development and Husum Way. This will be very busy and safety measures must be adequate. A traffic light system would probably satisfy this situation. • The proposed access road to the proposed development must not be continuous between Husum Way and Comberton Road. It should be closed off at the stream and only emergency vehicles should be allowed full access. • In addition the access road to the proposed development must not be straight with a number of curves included to prevent excessive speeds even though it is supposed to have a 20mph speed limit. I would like to propose the following concerning the general development of the eastern Kidderminster area. • It is understood that the developer is anxious to commence building as soon as possible. I would urge you to consider all the other possible brown field available sites before this is allowed. • The former Lea Castle hospital site near Cookley, which is already earmarked for a development of 600 dwelling will			

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							put pressure on the existing facilities in Cookley namely the primary School and doctor's surgery. If this site was to be extended to include the land up to the Wolverhampton Road and then Axborough Lane at the rear of the Lea Castle site, then this would enable around 2,000 dwellings to be built. The development would then be a sustainable community and be eligible for its own school, bus service and doctor's surgery, taking the pressure off the village of Cookley. As this area is on the other side of the A449 and already well screened by woodland it would not have a significant visual impact on the village. It would then also be in the catchment area for Wolverley CE High School. • That regular (every 5 or 10 years) assessments are carried out concerning the need for additional housing in the Kidderminster area as there has been little or no increase in the population of Kidderminster over the past twenty years. • Should the need for extra housing be significantly less than the estimated population growth then the valuable agricultural land earmarked for development should be optimised and continue to provide much needed food produce and reduce the need to import food from elsewhere. As we all know once arable land is developed for housing there is no going back!			
Whittle Joan	LPPS63	32 Kidderminster Eastern Extension	No	No	No		Please use brownfield land first. All farm land is needed for food production after Brexit. Please improve road safety at the junction of Husum Way traffic island and speed camera (if plan approved) If planning goes ahead a tree bund of 30 metres. Access to the new development must be via Shakespeare Drive via a traffic island. If planning is passed 20 mph limit in the spine road and speed bumps.			
Hagley Parish Council	LPPS218	Policy 32	Yes	No	Yes	Justified Consistent with National Policy	We oppose the sites on Husum Way (OC/5-6): • On strategic grounds, that the development should be on other sides of Kidderminster. • Because this is grade 2 farm land, which ought to be kept growing food (accordingly to Plan Policy 28D. • It is unnecessary: WFDC is allocating more land for development that it needs to and can show no "Exceptional circumstances" for doing so. This point is developed more fully as an objection to Policy 6A annex	Sites OC/5-6 should be deleted.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument

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							on quantum.			
Brakewell Ian	LPPS7	O/C 6 O/C 13N	Yes	No	Yes	Effective Consistent with National Policy	1. By-pass. No matter how much you attempt to conceal it, this proposed development is nothing other than a Kidderminster Eastern By-pass with ribbon development on either side of it. Furthermore although it has a roundabout at the southern end, its T-junction connection on Husum Way hill is dreadful and, with a blind summit on the railway bridge itself, would be dangerous for motorists turning in and out of the new road. Increased traffic using this new road as a town by-pass to drive towards Stourbridge or Wolverhampton will only push more traffic along the hopelessly inadequate Hurcott Lane. Constructing 1400 new homes without the correct supporting road/ railway-bridge infrastructure is ridiculous. 2. Car Usage. It is a frequent complaint from central government that new housing developments are rendering people car dependant. This straggly new proposed estate, especially at the O/C 6 end, connects with nowhere and goes nowhere. If each house has only one car owner (often they have two or more) that means, minimally, 1400 home-owners over the whole development will be putting at least 1400 cars on to a road system that was just not built for those kind of numbers. We can envisage an estate that is over-trafficked at both ends and worse than that becomes an appalling rat-run. 3. Devaluation of homes. Everybody living on the following Offmore roads will suffer depreciation and devaluation of their homes with a large estate at the rear: - Munro Close, Rossetti Close, Offmore Farm Close, Ruskin Avenue, Chaucer Crescent, Prior Close and Elmdale Drive. Further south there is Ashdene Close and Silver Birch Drive. Will these residents be offered compensation for the noise, dirt and inconvenience when building works commence? 4. Offmore Farm Residential Home. This looks like becoming an "island" with roads and houses around it. It still retains many of the features, barn conversions, outbuildings etc of its original use. We think that encircling it with a housing estate, chopping down trees and upsetting the still evident and plentiful wildlife is a terrible idea and is yet another part of the plan that doesn't make any sense. 5. Conclusion. In conclusion we, along with friends and neighbours on Offmore, think that the whole plan for an eastwards extension of Kidderminster are essentially flawed, as presented, and are most definitely not "sound".	Abandon O/C 6 in its entirety on account of the comments above. Rethink O/C 13N including putting a physical barrier at the Hoo Brook, making this the northwards limits of building from the A448, and thus preventing it from becoming a through route. This doesn't necessarily make the plan "sound", but it might make it less "unsound" than before.	No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 32: KIDDERMINSTER EASTERN EXTENSION

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Kidderminster Civic Society	LPPS887	Policy 32	Yes	No	Yes	Justified	Whilst our key objectives of high standards in planning and architecture, promotion of education/history of the area, preservation, development and improvement of features of historic and public interest are met, we do have concerns about the 2% Green Belt land taken for housing, east of Offmore, which includes prime agriculture A2 and 3A production land which benefits from a historic irrigation system installed by Lord Foley.	Saving 2% of Green Belt Land East of Offmore (or a good part of) by consideration given to fill this by other "other reserved for housing building" sites, OC/5 site especially should be saved from development because of the historical relevance to Lord Foley and, and also, that it contains prime agriculture land currently being farmed. Land available for use could be land at Sion Hill school site, land at Captains on Comberton Road, land off Wolverley Road adjacent to Marlpool Gardens estate and land off Ferndale Estate.	Yes	As an executive committee member and secretary designate of Kidderminster Civic Society, it is imperative that this society speaks up for the area it represents and the people who live in it.
Pre-submission Anonymous	LPPS929	Policy 32-Kidderminster Eastern Extension					One big advantage of using the Offmore outskirts is that it will give an opportunity to build an outer ring road which will relieve the Chester Road/ Broadwaters area. It will also avoid people using Offmore as a rat-run.			
Whittle Peter	LPPS57	Kidderminster Eastern Extension	No	No	No		Important that all brownfield sites are utilised before the use of greenfield, agricultural land is presently used for food production. Utilising the additional land at the former Sion Hill site be brought forward and included for housing in this review. The empty post office in the centre of town be considered for redevelopment into flats for housing. If development to the east of Offmore and Comberton is to take place the following alteration to the proposals are essential: The proposed access road off Husum Way is far too dangerous and must be altered. Access to the new road must be from a point opposite the junction with Shakespeare Drive via a traffic island. The new spine road from Husum Way to Comberton must not be used as a rat run and further planning must be taken to avoid this happening. A tree bund at least 20 metres deep to be provided at the boundary of the existing Offmore development i.e. behind all existing properties and cul-de-sac end at Husum Way, Munro Close, Rossetti Close, Tennison Way, Chaucer Crescent, Prior Close, Silver Birch Drive, Ashdene Close. A similar tree bund must also be provided at the rear and side of Offmore Farm residential Home and the barn conversion development at Offmore Court by an extension of the proposed community orchard.	The proposed access road off Husum Way is far too dangerous and must be altered. Access to the new road must be from a point opposite the junction with Shakespeare Drive via a traffic island. The new spine road from Husum Way to Comberton must not be used as a rat run and further planning must be taken to avoid this happening. A tree bund at least 20 metres deep to be provided at the boundary of the existing Offmore development i.e. behind all existing properties and cul-de-sac end at Husum Way, Munro Close, Rossetti Close, Tennison Way, Chaucer Crescent, Prior Close, Silver Birch Drive, Ashdene Close. A similar tree bund must also be provided at the rear and side of Offmore Farm residential Home and the barn conversion development at Offmore Court by an extension of the		

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								proposed community orchard.		
Barberry Hurcott Limited	LPPS928	Kidderminster Eastern Extension	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Discussion relates to site OC/4 Land to the Rear of Baldwin Road, which was in the preferred options document but has not been brought forward in the pre submission plan. It is considered that is inconsistent for the council to disregard this site due to its potential impact on the SSSI and then to allocate a site that is located a similar distance to the SSSI (site BW/4). The site has no more than local significance for archaeological remains. The site is situated within Flood Zone 1and the site is suitable for SuDS features. Rejects the landscape reasoning on why the site was not put forward in pre-submission plan. Site was to impact on setting of Hurcott hamlet. This hamlet has no listed buildings nor is in a conservation area. The allocation of a roundabout on site OC/5 (Policy 32.1) will urbanise the area, which was one of the reasons in which this site was rejected.	To include site OC/4 Land to the Rear of Baldwin Road in the Wyre Forest District adopted local plan.	Yes	Due to the complexities of the issues of concern to the promoter, and the nature and the extent of public involvement in this site, it is considered that further verbal clarification and discussion at the EiP Hearings will be essential, and will further assist the inspector.
G Herbert Banks	LPPS684	Policy 32	Yes	No	No	Effective	The above site, off the Birmingham Road, was included in previous drafts/consultation documents as an employment site next to the Kidderminster Eastern Extension. Site WFR/CB/7 was initially identified by WFDC themselves and in that regard was not put forward by the landowner in the original call for sites. Similarly to the site of Husum Way - the site is self-contained/self -governing. It is bound by the Birmingham Road to the North, the railway to the South, Hodgehill Farm to the West and Hodgehill Farm shop/Deli/Cafe to the East. Birmingham Road itself has space for upgrade to accommodate upgraded access depending on the employment uses proposed and its location on the outskirts would assist in keeping traffic off the more limited road network within Kidderminster itself. Comments were made regarding the sustainability of the site, however, as noted below - a development of this scale will ensure effective provision of infrastructure to support new development. There are regular bus services along the Birmingham Road and this route itself is a strategically important route, is a lorry route network and also a cycle route network. There are good footpath links back into Kidderminster. The site, considering the cycle links and bus services, is one which already has sustainable transport links but links which are able to be vastly improved by a development of this size and nature through increased users. The proposal, for an urban extension, maximises two key basic principles - a key one of which is a scale of new development which will allow effective provision of infrastructure and will thus capture sufficient contributions for supporting infrastructure.	Inclusion of the previously proposed site reference WFR/CB/7.will boost the supply of employment land adjacent to the proposed Kidderminster Eastern Extension. It is considered that given the restrictions for adjoining local authorities, including Bromsgrove DC which is in excess of 90% Green Belt, that WFDC should be working to assist in any potential shortfalls from adjoining LPAs. Modification, to include this previously included site, will assist in making the plan more effective in providing employment land for the district and thus sound.	No	

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							It is not clear why the above site has been removed from the Local Plan Pre-Submission Publication, however, it is still considered that this proposal would be a strong option for employment land. It will be adjacent to a larger extension to Kidderminster but also offer strong transport links/road access to Hagley, Stourbridge, Dudley and Birmingham. Being on the outskirts also assists with traffic movement through the town centre itself. There are few other options, of this scale, on the outskirts of Kidderminster. The site in question is currently allocated as Green Belt and would require removal from the Green Belt. The Green Belt has not been reviewed, in WFDC, since the 1970s and WFDC acknowledges that previously developed land alone will not be sufficient to meet the growth requirements of the district. A development of this size will clearly bring with it social and economic benefits and would be directly required to provide educational and employment sites which is an advantage over smaller developments. It is noted that any proposals would be required to take account of existing constraints. Given the notable increase in housing it would be prudent to allow for larger new employment sites during the plan period and not rely on mixed use sites for allocation. It is not considered that the pre-submission plan is sound because it does not effectively deliver sustainable employment sites which would be important to the district - instead there is a reliance on mixed use sites.			
Worcestershire County Council, Planning Economy & Performance	LPPS990	Policy 32					**Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)** OC/5 Land at Husum Way OC/6 Land east of Offmore. OC/12 Comberton Lodge Nursery OC/13N Stone Hill North.	Policies 32.1, 32.2 and 32.4 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.		

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Place Partnership Ltd	LPPS682	Policy 33	Yes	Yes	Yes		The County Buildings site in Stourport-on-Severn provides a very significant brownfield regeneration opportunity in the town. The site is triangular and bounded by Foundry Street, Bewdley Road and Worcester Street. The buildings themselves are part two and three storeys in height, constructed of concrete frame with brick infill and there is undercroft parking beneath In the existing Site Allocations and Policies Local Plan (adopted July 2013) the site is already allocated for the following mix of uses by Policy SAL.STC2 – Tan Lane and County Buildings: • Residential (Class C3); • Community Use (D1, including police and fire services); and • Commercial uses (offices) It was though not possible to redevelop the site during the current development plan period as alternative locations for the existing occupiers had not been found. These are: • Hereford & Worcester Fire and Rescue Service (HWFRS); • Stourport Health Centre (NHS GP Surgery); • Mobile phone masts (EE) located on roof; and • West Mercia Police (WMP). However, HWFRS were granted planning permission (18/0034/FULL) on 20 March 2018 for the construction of a new Emergency Services Hub in Kidderminster. Once complete this new facility will replace all three existing fire & rescue stations in the District, which are in Kidderminster, Stourport-on-Severn (County Buildings site) and Bewdley. All three sites are intended to provide positive opportunities for regeneration and the receipts generated will go towards the cost of the new Hub, which is scheduled to become operational by the end of 2019. At the time of writing WMP are in the process of moving out of the County Buildings site and re-locating to the Stourport Civic Centre (known as 'The Civic'). This will be completed by Spring 2019. The other two occupiers are subject to leases that expire by the end of 2021, whereupon the whole County Buildings site will become available for redevelopment. This confirms that new housing can be delivered within the next five years, as recognised by the conclusion of the District Council's Housing and Economic Land Availability Assessment 2016 (updated October 2018) on the site. It is therefore trusted that the above information is sufficient to wholly allay the objections from third parties during the Preferred Option stage that there was no	Not applicable.	No	Whilst we do not consider it necessary to participate at the oral part of the examination, we would be happy to do so if the Inspector considers this to be beneficial to proceedings.

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							certainty that the site would become available. By contrast, it is now demonstrably the case that the site will be fully available for redevelopment from the beginning of 2022 onwards. WCC therefore supports the District Council's assessment of the site alongside Policies 33 and 33.9, which allocate the site for 40 Class C3 dwellings. We also support the fact that the total given is specified as being indicative and WCC wish it to remain as such, as WCC consider that there may well be potential for more dwellings at the site. This can be tested appropriately at the planning application stage. The proposed allocation therefore clearly represents a proactive and effective use of brownfield land, held in public ownership, to deliver much needed new homes in the District, as envisaged and supported by Chapter 11 (paragraphs 117-123) of the National Planning Policy Framework (2018). This in turn helps support the delivery of the Government's objective of boosting the supply of homes (paragraph 59) and helps the Council to plan for a mix of housing in the District for different groups (paragraph 61).			
Gladman Developments Ltd	LPPS889	Policy 33	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Gladman are promoting land at Areley Common, Astley Cross, for residential development (the location plan is attached). This 8.32ha site presents an ideal opportunity to create a sustainable, distinctive residential development to the south of Astley Cross and Stourport-on-Severn. A residential development on this site would incorporate both new market and affordable housing to help meet current and future housing needs. A small proportion of the site falls within Wyre Forest District, with the majority falling within Malvern Hills District. The site is situated immediately adjacent to existing residential development on the southern edge of Astley Cross, Stourport and the proposed built up area extends no further south than the existing hedgerow which forms a defensible site boundary running west to east. The proposal represents a logical extension in a sustainable location with access to a good range of local services and facilities.	Land at Astley Cross, Areley Common should be considered for allocation for 125 homes.	Yes	To discuss the issues raised in our written submissions.

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							Development in this area was considered for the planning application 13/01405/OUT on land off Pearl Lane (Malvern Hills) where the Officer Report clearly acknowledges the locational sustainability of the nearby site in relation to access to services and facilities in the built-up area. The site is available and achievable for the delivery of 125 new homes and should be considered for allocation. Given the cross boundary location of the site the Council should consider the site to help meet the housing needs within Stourport-on-Severn. Gladman are keen to work with the Council's to bring this site forward as a high quality residential development. Indeed, the delivery of this development could provide an ideal opportunity for the authority to work in collaboration with Malvern Hills through the Duty to Cooperate to ensure housing needs are delivered across the wider housing market area.			
Bourne T	LPPS266	Policy 33	Yes	No	Yes	Effective	No robust justification has been put forward as to why site, such as AKR/14, which were not previously indicated as core housing sites are now proposed for allocation in the pre-submission version of the local plan. The site off Lickhill Road North (WFDC ref: L1/6/7), especially that of Bournewood Nurseries, was previously indicated as a core housing site but is not longer included in the pre-submission version. We fully support commitment to Green Belt Review through its plan preparation process. It is fully acknowledged that this will enable development to be brought forward in a number of sustainable locations that would otherwise be constrained from growth without compromising too heavily the purposes of including land within the Green Belt. Bournewood Nurseries, L1/6/7, if brought forward for housing, would not extend the development boundary any closer to Bewdley/Blackstone than The paddocks which stretches beyond the boundary of this site nor any further than the existing housing to the North. The site is immediately on to a main road, with a well-established traffic light system at Burlish Crossing, as well as access to services including electricity and drainage. Future occupiers of the site are on the outskirts of the	Ensure allocation of brownfield sites over green field sites when including within the proposed local plan. This will assist in justifying release of Green Belt and effectively deliver land for housing and development needs in the district.	No	

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							town where they have a choice of routes by car to Kidderminster, Bewdley and two routes to Stourport Town assisting in management of traffic. This is a direct contrast to the sites in the town centre, which already regularly has notable congestion issues due to parking either side of the high street and slow traffic around Gilgal. Locating house on a site such as this removes pressure on town centre infrastructure yet still allows as sustainable development with strong public transport links and services to reduce reliance on the private car. There are bus links (15,294) adjacent to Garland Road, to the South, and bus links on Bewdley Road North (16, S15) which provide bus links to Stourport, Bewdley and Worcester all within a few hundred meters which is walking distance of the proposed site. There are footpath links, with a footpath (570 (C)) adjacent to the site and pavement links, allowing access to a variety of open space including the River Severn, Blackstone Rock, Burlish Top Nature Reserve, Rifle Range Nature Reserve and Devil's Spittleful Nature Reserve. Further more within the local area there are schools (Lickhill Primary School, Burlish Park Primary School and Stourport High/Sixth Form Centre), community centres, a sports ground and a park as well as local services within walking and cycling distance. It is understood, from officers at WFDC, that Bournewood nurseries was removed from potential allocation due to unspecified highway reasons. The site is located on the outskirts of Stourport on one of two main roads to Kidderminster and Bewdley. Traffic from this site would be onto Lickhill Road North, however, it should be noted that traffic from other proposed sites such as AKR.18, off Lickhill Road to the South, will still come out into Lickhill Road and use this route to Burlish Crossing as will M1/6. We see no reason why the site should be excluded for "highway" reasons as other sites will contribute just as much to increased road usage as Bournewood Nurseries if brought forward. Whilst we agree with the principle of a Green Belt review to accommodate housing and development need in the district we do not agree with removal of green field, Green Belt, land ahead of previously developed sites within the Green Belt. It is acknowledged that Green Belt			

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							is a spatial planning tool, however, given the location and the points discussed above it is not considered that development of this site conflicts with the reason for including land within the Green Belt. The re-development of previously utilised, brownfield, sites should take precedence over green field sites and in light of the fact the LPA are already seeking to remove land from the Green Belt - brownfield land should take precedent. The current approach is not justified or effective.			
Green Catherine	LPPS35	paragraph 33		No		Justified Effective	I do not consider the planning for 2 new housing developments (Map ref: M1/1, M1/38) to be sound for the following reasons: 1. Para 4.2, section 13.6 transport access and sustainable future. The proposed building developments were not on early planning development submissions and so this is the first and only opportunity to comment upon them, which is totally unfair as the final date for comments is 17th December 2018. I do not accept that the council has sufficiently considered and justified all the factors that will impact on the existing housing area and traffic chaos created at the start and end of the school day and rush hours, at 2 major road junctions. The council had already recognised that a previous planned development (L1/2) would impact on the traffic chaos, but this newly proposed development does nothing to negate the issue. The existing housing estate, Burlish Park, already suffers from poor parking provision for parents collecting and delivering pupils to two schools, causing chaos as parents jostle for parking spaces on the main route through the estate, Windermere Way and all streets off it. Children from the High School are often seen to wander dangerously through the traffic melee as they try to access the cars at the end of Windermere Way and Kingsway. I can see no way this will be reduced by the new developments, as both are also rat runs, accessing the same major junctions. Whilst this plan states the new houses would be accessed from Kingsway, this may not be the case in future. The extension of the Burlish Top Nature Reserve could exacerbate these issues were the housing development to continue, as it needs a car park which would again lead off	That housing development should not go ahead, but be given over wholly to the extension of Burlish Top nature reserve.	No	

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							Kingsway. Stourport very much needs the Nature Reserve to ensure that Kidderminster and Stourport are clearly defined and not one long conurbation. Its Green Belt status has been removed which is concerning as the council could then decide further building development in the future could be carried out on this land. The estate itself is poorly served by public transport which might have relieved some of the congestion. 2. M1/38 This Site is surplus to educational Needs. The document justifies this development, as the pupils from the original Middle School on the site are now incorporated into the provision by the new Burlish Primary (rebuilt and opened in 2014 following Wyre Forest reorganisation in 2007. However the new site runs along side M1/38 means there would be no where for it to extend to accommodate the probable extra pupils. In the Burlish Primary Ofsted Report of July 2018, the schools numbers were listed as 471, but with an authority allocation of 420. How could that school accommodate further pupils in its immediate catchment area. The very building of more houses on this land would mean no room for it to expand in future years. This policy states that by selling land M1/38 (30.33) after being permitted to build on existing playing fields to create a new Sixth Form Centre, The Stourport High School exceeds the playing pitch requirement already, but is to have an extra 30 pupil intake for the next 5 years. It has agreement to use the Stourport Sports Centre facilities to make up this discrepancy. However this statement does not take into account that the school has to pay to a high sum do this and that in the current economic climate, that in itself may not be sustainable.			
Green Alan	LPPS174	paragraph 33/ table33.0.1		No	No	Justified Effective	I do not consider the planning for 2 new housing developments (Map ref: M1/1, M1/38) to be sound for the following reasons: 1. Para 4.2, section 13.6 transport access and sustainable future The proposed building developments were not on early planning development submissions and so this is the first and only opportunity to comment upon them, which is totally unfair as the final date for comments is 17th		No	

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Green Alan	LPPS173	paragraph 33/ table33.0.1					No comment submitted.			
Hale Angharad	LPPS297	Policy 33			No	Positively Prepared Justified Effective	I do not consider the allocation of proposed site L1/11 - 200 Houses on the Land West of School Site Coniston Crescent to be justified as appropriate to the are or sustainable development. If this development goes ahead in addition to proposed site M1/38 - 115 House on School site Consiton Crescent, this would be overdevelopment of the area. (I have no objection to proposed site M1/38 if just 115 houses are built). The volume of additional traffic that would be created from an extra 315 house using The Kingsway as their main exit road would not be sustainable. The Kingsway is already in a poor state of repair, includes blind bends, no pavement or street lighting and would be hazardous with this additional volume of traffic. The cost of upgrading and making The Kingsway fit for purpose to be used by residents of this new development, would no doubt need to b absorbed into the developers costs and could result in poorer, smaller housing or more houses being squeezed in to the area.	I would suggest proceeding with proposed site M1/38 and NOT proposed site L1/11 as this small number of houses would not put the same strain on the infrastructure of the area.	No	
Betts Maisie Beatrice	LPPS37	Paragraph 33 table 33.0.1		No		Justified Effective	I do not consider the planning for 2 new housing developments (Map ref: M1/1, M1/38) to be sound for the following reasons: 1. Para 4.2, section 13.6 transport access and sustainable future	That the housing development should not go ahead, but be given over to the much needed nature reserve as a Green Belt buffer against the merging of Stourport and Kidderminster towns which is totally unacceptable.	No	

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							The proposed building developments were not on early planning development submissions and so this is the first and only opportunity to comment upon them, which is totally unfair as the final and only date for comments is 17th December 2018. I do not accept that the council has sufficiently considered and justified all the factors that will impact on the existing housing area and traffic chaos created at the start and end of the school day and rush hours, at 2 major road junctions. The council had already recognised that a previous planned development (L1/2) would impact on the traffic chaos, but this newly proposed development does nothing to negate the issue. The existing housing estate, Burlish Park, already suffers from poor parking provision for parents collecting and delivering pupils to two schools, causing chaos as parents jostle for parking spaces on the main route through the estate, Windermere Way and all streets off it. Children from the High School are often seen to wander dangerously through the traffic melee as they try to access the cars at the end of Windermere Way and Kingsway. I can see no way this will be reduced by the new developments, as both are also rat runs, accessing the same major junctions. Whilst this plan states the new houses would be accessed from Kingsway, this may not be the case in future. The extension of the Burlish Top Nature Reserve could exacerbate these issues were the housing development to continue, as it needs a car park which would again lead off Kingsway. Stourport very much needs the Nature Reserve to ensure that Kidderminster and Stourport are clearly defined and not one long conurbation. Its Green Belt status has been removed which is concerning as the council could then decide further building development in the future could be carried out on this land. The estate itself is poorly served by public transport which might have relieved some of the congestion. 2. M1/38 This Site is surplus to educational Needs The document justifies this development, as the pupils from the original Middle School on the site are now incorporated into the provision by the new Burlish Primary (rebuilt and opened in 2014 following Wyre Forest reorganisation in 2007. However the new site runs			

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<tr><td>Severn Trent Water Ltd</td><td>LPPS1056</td><td>Policy 33</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Positively Prepared</td><td>We would like to draw your attention to the High and Medium risk sites which we would be keen to discuss further to understand likelihood and growth trajectories.
<table>
<tr><td>AKR/10</td><td>Queens Road Shops</td><td>Known hydraulic sewer flooding downstream and downstream pumping station has storage issues. Modelling will be required.</td><td>Medium Risk</td></tr>
<tr><td>AKR/14</td><td>Pearl Lane</td><td>Known hydraulic sewer flooding and surface water flooding issues at this site. Severn Trent are looking to work in partnership</td><td>High Risk</td></tr>
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<tr><td></td><td></td><td>regarding a flood alleviation scheme in this area.</td><td></td></tr>
<tr><td>MI/6</td><td>Steatite Way</td><td>Known highway flooding downstream of these developments and potential pollution risks.</td><td>Medium Risk</td></tr>
<tr><td>MI/38</td><td>School site Coniston Crescent</td><td>Any redevelopment of this site needs to ensure surface water runoff is managed sustainably and every effort is made to remove any surface water flows currently connected to the foul sewerage system.</td><td>Medium Risk</td></tr>
<tr><td>LI/11</td><td>Land west of former school site</td><td>Known sewer flooding issues immediately downstream. Modelling will be required.</td><td>Medium Risk</td></tr>
</table>
</td><td></td><td></td><td></td></tr>
<tr><td>Worcestershire County Council, Planning</td><td>LPPS991</td><td>Policy 33</td><td></td><td></td><td></td><td></td><td>Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource) or within 250m of a waste site.</td><td>AKR/14 Policy 33.5 should require the developer to undertake a minerals resource assessment to inform design and to optimise</td><td></td><td></td></tr>
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Economy & Performance							AKR/14 Pearl Lane, Areley Kings. AKR/18 Yew Tree Walk. LI/11 Land west of former school site Coniston Crescent. MI/10 Four Acres Caravan Park. MI/24 Adj Rock Tavern Wilden Lane. MI/38 School site Coniston Crescent. MI/36 Firs Yard Wilden Lane MI/18 Land north of Wilden Industrial Estate.	opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it. AKR/18 Policy 33.6 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it. LI/11 Policy 33.8 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it. MI/10 Policy 33.13 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it. MI/24 Policy 33.15 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.		

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								MI/38 Policy 33.16 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it. MI/36 Policy 33.17 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it. MI/36 Policy 33.17 should require the developer to demonstrate that as the 'agent of change' (NPPF paragraph 182) the proposed development will not prevent, hinder or unreasonably restrict the operation of the existing. MI/18 Policy 33.19 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.		
Worcestershire Wildlife Trust	LPPS343	Policy 33-Stourport-on-Severn Site Allocations	Yes	No	Yes	Consistent with National Policy	WWT believe that site allocation AKR/18 Yew Tree Walk is not consistent with national policy and that the proposed allocation is not sound.	We believe that this site allocation should be removed or the overall number of dwellings significantly reduced. Unfortunately we cannot recommend an 'acceptable' number of dwellings as this would be dependent on the findings of additional ecological surveys, suggesting that at this stage deletion of the site could be the most appropriate way forward.	No	

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Bourne T	LPPS775	Policy 33	Yes	No	Yes	Justified Effective	The objections for this site in the preferred options consultation see WFDC officers comment that the site is no longer included "mainly due to highway issues at Burlish Crossing". The objections/comments stated that traffic was an issue at Burlish Crossing, and this was a key concern along with negative impact on wildlife and Green Belt land. WFDC have already undertaken a Green Belt review and concluded that removal of some land from the Green Belt, was necessary. The consultation fails to acknowledge that the site is a well trafficked garden/nursery centre already. The site is run commercially, is already partly developed (And thus a brownfield site) and open to the public and wholesale. The site already experiences a good volume of traffic movements (deliveries, customers and employees etc.) on a daily basis as a commercial set up - development for housing will not, therefore, result in a significantly increased impact. The site is deliverable within five years.	Ensure allocations of brownfield sites over Green Field sites when including within the proposed local plan. This will assist in justifying release of Green Belt and effectively deliver land for housing and development needs in the district.	No	
Stourport on Severn Civic Society	LPPS361	Policy 33.3 Swan Hotel Working Men's Club, AKR/7	Yes	No	No	Justified	Objection to AKR/7 Swan Hotel and Working Men Club as this fails to recognise the growing night time economy of Stourport and need for car parking. The plan did not receive the publicity it should have done and many local people will be unaware of how it will adversely affect them. The consultation form is not user friendly and does not encourage response.		No	
Borrill Irene	LPPS312	Policy 33.5		No		Justified Effective	This response relates to reference AKR/14 proposed development of 250 units at Pearl Lane, Areley Kings. The town of Stourport on Severn has only one main thoroughfare running through it and this is a notorious bottleneck with traffic frequently backing up along the Dunley Road (A451). A ring road around Stourport on Severn has been anticipated for many years but has not been carried forward by Wyre Forest District Council. The proposed development at AKR/14 of 250 units would substantially increase the number of road hours all vying to gain access to the main road through Stourport. Such a large development could increase the vehicles on the road by anything from 250 - 1,000. Additionally, this proposed development is not the only one in the area (Malvern Hills DC are also contemplating a development of some 62 units also off Pearl Lane). This will have the attendant problems as those expressed above. From this area, the only way to reach the railway station at Kidderminster (for those working in Birmingham or the Black Country or the other way into Worcester, etc) is via	In my view, to make such a huge development sound or justifiable, WFDC would need to either significantly reduce the proposed number of units in the development AKR/14 or improve the road infrastructure in and around the Stourport area.	No	

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							the above mentioned road through Stourport on Severn. This can only lead to extreme traffic congestion and this, coupled with the reduced parking in Stourport on Severn, owing to the proposed development at the Swan Hotel, (AKR/7) will mean that locals and visitors alike will have severe problems accessing the town and parking. The road infrastructure in and around the Stourport area simply does not support such an increase in road users and will, I have no doubt, lead to an increase in road traffic accidents and road pollution. The fact that land is available does not always mean that it is suitable for development and in my view, it is reckless of WFDC to consider increasing the housing units in this area by such a large amount without first improving the road infrastructure. In addition to the above, with such a large proposed increase in people in the area, the WFDC would need to introduce additional GP surgeries in the town. The present ones struggle to provide appropriate care for their already large doctor to patient ratios. I am sure Stourport is not the only town to experience this problem but why make it worse? How awful to live in an area where to attempt to visit the local town, the GP surgery, the Dentist, etc, will become a nightmare. Is this what newcomers to the area will want to come to? Local businesses and shops in Stourport will not really benefit from the additional footfall as locals from this side of Stourport will not find it attractive to sit in endless traffic all vying to get into a town where they know they will have trouble parking. Many will simply keep going through Stourport and head to another more convenient town. I do hope that this proposed development does not turn Stourport into a ghost town.			
Pre-submission Anonymous	LPPS936	Policy 33.5 Peal Lane AKR/14					Following our visit to Areley Kings Village Hall on Friday this is just a letter of thanks and appreciation to you and your staff for kindness and helpful answers to questions we raised in particular for a copy of a key map which has just been received by post and which helps to resolve a question of particular interest to me and my wife as householders affected by nearby building development. It also now clear to us that we do not have the ability to take part in any further discussion of the developments nor the resources to finalise legal requirements in the style required.			
Pre-	LPPS952	Policy 33.5,					I am very unhappy with the on line form which had to be			

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submission Anonymous		Pearl Lane, AKR/14.					completed and submitted. I was not able to follow the form and despite emailing twice was told that this was the only way to do it. I'm very disappointed and to be honest disgusted that your way is the only way to submit an objection or comments. Perhaps you should look at your form and accept that not everyone is happy with what you deem the only acceptable way. I am completely against any more housing in Areley Kings until the roads are improved. There is a major problem with traffic into /through Stourport already. I cannot believe that yet again new housing is being discussed without any thought, plans for a ring road or by pass. The residents of Areley Kings seem to be ignored and treated with disdain. Unless the roads are sorted no discussion on housing should be even on the agenda. I feel that the fields suggested should be properly surveyed, to make sure it is of no historical significance. I believe some items of Roman pottery have been found. This is the second reason but the Road is the priority with or without more housing.			
Smith Gillian	LPPS142	33.5	No	No	No	Positively Prepared Justified Effective	Local infrastructure cannot cope with the building of additional houses in Arley Kings. The only access into the town and local amenities shops schools doctors etc is by way of a bridge built in 1870. I do not consider that this bridge is able to withstand the additional traffic. At peak times there is considerable delay in accessing the town. With this housing development this delay will only worsen. In addition the weight of multiple building lorries crossing this bridge will cause it considerable stress. Stourport High street Bridge Street and Gilgal are areas of gridlock. The additional traffic caused by this housing development will only increase this. The crossroads of the B4194 Pearl Lane and A451 Dunley road is a notorious accident black spot. There have been several serious collisions here. Increasing the amount of traffic will only further increase the number of accidents	I do not believe that any modifications could be made to make this plan legally compliant or sound.	Yes	The reasons listed above.

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							here. It is believed by residents that the site of the development contains traces of a Roman Settlement as such an archaeological survey would need to be carried out prior to any building work commencing. The land itself has varied wildlife including birds of prey and bats such a development would have a detrimental effect on these. The development site is elevated and would cause loss of privacy to the existing houses in the area. A previous planning application for the erection of a mobile phone mast on the same site was successfully objected and planning refused. Research discovered that this land was an area of outstanding natural beauty and as such could not be built on.			
Bird David and Carol	LPPS308	33.5					Me and my wife feel that we do need more homes in Stourport but to build homes on the corner of Pearl Lane and Dunley Road would put more traffic through our now congested town and on a Friday with the car boot at the Wobbly Wheel it will be hell. If you have to build 250 homes there can the doctors cover? Approximately 500 people more we only have two doctors' surgeries. If we need to go to Kidderminster we would have to allow an hour to get there i.e. hospital. We both feel that there is still room for homes on the old Bond Worth site but as I said before, if we do have to have more homes at the corner of Pearl Lane may I suggest under section 106 that the builder puts an island or traffic lights at the cross roads of Pearl Lane/Dunley Road as there have been a lot of accidents there and it might save one or two lives in the future. I am sure the police have a record of accidents that have happened there and it might slow the traffic down to stop speeding to and from the town. I apologise for not filling the form in as I did not understand what to fill in sorry.		No	
Cooper Karen	LPPS112	33.5 AKR/14	Yes	No	Yes	Consistent with National	1. Consent already given for housing estate in triangle between Areley Common and Pearl Lane - we do not want		No	

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						Policy	any further development. 2. More building in this area will ruin beautiful fields and walks, reduce wildlife habitats and farming and also considerably increase pollution and exacerbate current traffic problems - both speeding and volume of traffic in Pearl Lane and awful queues for cars wanting to cross Stourport and Bewdley bridges. Shrawley Road to Worcester already very difficult for residents - noise, pollution and danger as road so bendy and narrow. Other areas of district more suitable, nearer better transport links and employment opportunities.			
Keen Maxwell	LPPS141	AKR/14: Pearl Lane	No	No	No	Justified Effective	Proposed development AKR/14 Pearl Lane, Stourport. I object in the strongest possible terms. I understand that 300 4 bed houses are planned, which would mean an estimated 500 extra vehicles, not to mention delivery, service and mail vehicles. There is already gridlock in the town. At peak times, it takes 20-30 minutes to get through the town from the Arley Kings direction; all the traffic is funnelled over the Victorian bridge to a very small crossroads in the town centre. This is a significant and highly undesirable bottleneck. The increased traffic from this proposed development will make this untenable and dangerous. There is already a planned development going ahead at the bottom of Pearl Lane with all the additional vehicles that will be using the bridge. The infrastructure is just not there on the western side of the town to support this. The eastern side of town is clearly far better suited to support further growth, notwithstanding the fact that the road system is clearly more able to sustain the increased vehicular access, the majority of schools, doctors, supermarkets and other services are all east side! There is also land available/unused. This planned development at Pearl Lane is very short sighted - notwithstanding the fact that it is an area of natural beauty and productive farmland. Also, a Roman site was identified during the work on the Blackstone to Astley aqueduct at Dunley Road at SO 79527007. So, a geology survey would need to be insisted on I would think.	Simple - develop the eastern edge of town, for the reasons above!	No	
Hjelter Jerry	LPPS301	Policy 33.5		No		Justified Effective	With reference to Wyre Forest District Local Plan Pre-submission publication 2018, Policy 33.5. If feel compelled to make the following comments following viewing the plans at their recent showing at Areley Kings Village Hall. I find it inconceivable that planners could ever consider any major building plans on the Areley Kings side of the Stourport Bridge. The bridge is the only link to the town		Yes	

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							for multiple areas that depend on it for access to schools, doctors, major stores plus all the other amenities both social and business the town is so reliant on to remain viable. As the bridge is I believe around 100 years old, I must question the logic of increasing the wear and tear on a structure that is the lifeline of the town. I also have doubts whether the structure is capable of standing up to the additional stress it will have to bear with multiple 40 tonne lorries crossing it both during and after any major building development. If the planner's have conducted an in depth study on traffic flow and the problems currently encountered on a daily basis, particularly during rush hours and weekends, these proposals would never be considered as they are a recipe for disaster. Indeed, I have genuine fears if the population and housing increases on this side of the river, should, heaven forbid, there be a major disaster, the emergency services would become impotent due to unavoidable delays in reaching their destination. In this instance, the people responsible for these plans will have blood on their hands in the event of fatalities. Are the planner's prepared to accept responsibility in writing when submitting any plans resulting in the building proposals we viewed? I must point out the crossroads of Pearl Land and Dunley Road, is an accident blackspot and any increase in traffic volume will add to the problem and as such is unthinkable. The traffic problems will also drastically affect the traffic flow in Stourport. Any traffic coming from Areley Kings must make a return journey and particularly during rush hours, areas like Gilgal, are hazardous and dangerous. To highlight this problem I know people, myself included, who have been hit by wing mirrors while walking on the pavement in that area, this is in addition to the many accidents already documented. The parking problems in Stourport are common knowledge and getting worse, especially since half of the Vale Road car park has been used for housing, contrary to the wishes of the residents and local businesses. Any additional traffic is undesirable but unavoidable with public transport ceasing around 20.00 hours. With this in mind any additional housing the Areley Kings area can only increase the traffic problems as the lack of public transport means the residents have no option but to drive			

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							into Stourport. I wonder if any thought or consideration has been given to the "hidden population" present in Stourport and surrounding areas. I refer to the vast number of people who reside in caravans and mobile homes. I know most of the sites are classed as Holiday parks, but a large percentage of the residents actually live on these sites up to 11 months of the year but will not appear on any population survey. Are they taken into consideration when statistics are compiled? They do of course still need to use all the facilities in the town including schools, hospitals, doctors, dentists, roads, car park as well as the shops and in doing so add to the pressures on the already overstretched infrastructure. Any housing development on the field highlighted is unthinkable for many reasons. Access in and out is fraught with danger, particularly as some drivers treat that stretch of Dunley Road as a racetrack and I fear it would be a matter of time before the unthinkable would occur. It is said by some of the senior residents in the area, the field in question of any possible development is a site of archaeological importance, it is rumoured to contain traces of a Roman Settlement so prior to any future construction work it is incumbent on any prospective building to ensure a full archaeological survey to be carried out. I would point out any future development will also have a detrimental effect on the wildlife such as the birds of prey I have witnessed circling overhead and the bats in the trees surrounding the field itself. About 15 year ago a residents protest group of which I was a member, were successful in preventing the erection of a Vodafone phone mast on land adjoining to the field in question. During investigations, one of the things the researchers discovered and assured us of, was that the field was part of an area of outstanding natural beauty, and as such could not be built on. These finding were part of the argument presented at the planning meeting and subsequently approval was refused. In closing I am of the firm opinion the proposals are not sound, not justified, not effective, will cause chaos and the infrastructure of the town is woefully inadequate to handle any increase in population in addition to the new			

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							housing Malvern DC have earmarked half a mile away. I have no doubt the new residents will want to avail themselves of the Stourport amenities.			
Duggan Derek	LPPS305	Policy 33.5	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	AKR/14 Pearl Lane is an unsuitable suggestion for housing. The footpaths on the fields are well used for local recreation, including dog walkers. There are roman remains evident on the fields and surrounding properties will suffer increased noise and air pollution with additional car usage. Stourports one and only bridge is a bottleneck with traffic extending back to Dunley village during the Wobbley Wheel car book sale on Fridays and during school holidays. Dunley Road/Pearl Lane/Ribbesford Road crossroads regularly witness road traffic incidents and I fear Dunley Road will suffer high levels of dioxins resulting in poor health for many of the elderly residents living in the bungalows fronting the road. The area specified is also a flood risk. Importantly, Malvern Hills DC are yet to build at the bottom of Pearl Lane and we await to see the impact of that development. Too many residents who appreciate the flora and fauna evident along this rural fringe this proposal will leave to a complete change of character. The views to Ribbesford Woods are exceptional. Wildlife will suffer and the "village" feel of Areley Kings will be lost to what is in effect urban sprawl over green and pleasant land.	Wyre Forest District is blessed with brownfield sites. Kidderminster has several areas which need to be utilised first including Worcester Street. Stourport has a sports centre boarded up with surrounding land - wouldn't this make more sense than using fields. There are disused areas of land around Tesco in Stourport too. Bridge Street has lots of empty premises too - can't the gravel patch where the former Lloyds garage be utilised. On the corner of Abberley Avenue with Bredon Way a bungalow has sat empty for over 5 years and I feel it is disgusting that so many buildings are just being left to rot.	No	
Stourport on Severn Civic Society	LPPS358	Policy 33.5 Pearl Lane AKR/14	Yes	No	No	Justified	Objection to AKR/14 site allocation as will exacerbate congestion and will affect wildlife. The plan did not receive the publicity it should have done and many local people will be unaware of how it will adversely affect them. The consultation form is not user friendly and does not encourage response.		No	
Smith Roy & Jennifer	LPPS391	Policy 33.5	Yes	No	Yes	Effective	Inadequate investigation, statistics and proposals to alleviate traffic congestion in and around Stourport and the effects of proposals in the plan to increase congestion. Suitability of site AKR/14 for housing. This is more detailed under Section 7.	The proposals for up to 250 houses on this site will undoubtedly cause a massive increase in traffic. The single bridge over the River Severn, coupled with the traffic bottleneck around Gilgal and the rest of the Stourport one way road system has difficulties coping with current levels of vehicle traffic, particularly at commuting times. The problems with traffic in Stourport are recognised under 6.39 of the Local Plan. No practical suggestions have been made how to	Yes	To question how transport management for the whole District has been developed and what the future plans are to alleviate the problems as this has not been adequately addressed in the Plan.

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								improve the situation. Whilst encouragement (Policy 13B "Travel Enhancement") is given to promoting the use of cycling and walking, the fact is that 40% of residents in and around Stourport travel to work in the West Midlands conurbation and Worcester. Just how this encouragement will be positively promoted to reduce car usage is missing from the Plan, otherwise the statement just remains an empty statement. There is a high proportion of older people living in the area where cycling and / or walking is an unlikely alternative. The use of public transport has to be looked at sensibly. To get from Areley Kings to the bus station in Kidderminster the number 3 bus route takes 25 minutes. It is then a 10 minute walk to the train station for the journey to Birmingham, which takes up to an hour with a similar time for a bus. The journey when travelling by car is much quicker. There is a train station in Hartlebury, but realistically it has to be accessed by car which means crossing the bridge, travelling up the accepted bottleneck of the one way system and adding to the vehicle movements around Stourport. To Worcester is a bus journey of 40 minutes but the bus stop is by the bridge in Stourport some 0.8 of a mile from the corner of Pearl Lane with Dunley Road. This is a 20 minute walk. To drive to Worcester one can either go over the river and get to the A449, or use the narrow lanes to go via Holt Fleet river crossing or continue in through Hallow. It is a half hour car journey. It has to be expected, therefore, that most of this 40% of the local population working outside the District will travel by car. Other people from the Areley Kings side of the river will have to travel over the Severn bridge to get to employment locations within the District, to use local shops, health facilities, etc., aiding to the		

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								congestion. The Local Plan acknowledges the traffic congestion problems, but offers no relief or suggests any alleviation with the use of AKR/14 for housing. Slow moving traffic causes poor air quality, as noted under 9.12G the "Health and Wellbeing" section of the Plan. Under policy 16.3 this is defined as pollution (which includes noise and fumes which impart on the environment and quality of life). The use of AKR/14 will therefore increase pollution. Under paragraph 6.39 of the Plan it is stated "in respect of future development in and around the town the strategic transport infrastructure in the town is therefore a key consideration". Wonderful strategy, but where are the solutions? Merely stating accessibility to the town centre by alternative modes for residents and visitors alike is extremely important to the town's future functionality and viability" is inadequate. Positive means as to how this will be achieved is a requirement to allow all the other policies to work. The Plan under 10C calls for encouraging tourism and improving transport links and connectivity within the District. Under 23.1 Tourism is a call for road infrastructure to be improved around tourist attractions. It calls for improvements in connectivity and achieving more sustainable travel patters and reducing the need for car journeys. However, no practical suggestions are made as to how this will be implemented. It will not go away by hoping more people use cars less. No statistical information has been provided, either in the plan or in supporting documents, what the peak traffic flow is travelling over the River Severn bridge and through Stourport plus travelling in the opposite way. Neither has information been provided on the estimated additional peak traffic flows all of the proposed developments both in Areley Kings area and in Stourport itself. Such information must be a requirement to assess the true viability and sustainability of developing the AKR/14 site and		

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								to a lesser degree other proposed developments on that side of the river. Common sense dictates there will be a large increase in traffic movements which current routes will have difficulty accommodating. The proposed overall increase in housing for Stourport of 1,068 houses would represent an increase in population of around 3,200 people (assuming just 3 people per household). For a population of 20,800 this represents an increase of about 15% over the period of the plan. Without increases in schools, health facilities and other infrastructure necessary for such an increase in people, the plan does not adequately propose any long term sustainability solutions. On traffic problems alone, the AKR/14 land should not be used for any development unless major road infrastructure improvements are introduced. This is likely to require another River Severn road bridge and association roads, with a full and effective traffic management plan. This Greenfield site is not considered to be a sustainable development location. The proposed housing site would result in the loss of prime Grade 2 and 3 agricultural land. The Local Plan Review Preferred Options Appraisal of May 2017, upon which the current Local Plan Review is based, clearly stated that the land in Areley Kings is high quality agricultural land. High quality agricultural land should not be built on. Paragraph 33.9 states that there is evidence of a Roman villa on the northern part of the site. This needs full archaeological investigation as without that information, the viability of the site is called into question in its ability to provide 250 houses. It should not be left until a planning application is made, but a proactive attitude is needed to assess archaeologically how suitable all of the site would be for development. We also believe that the WFDC Local Plan could better support the community through		

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								intelligent and sustainable regeneration of key areas of Kidderminster, Bewdley and some of the smaller villages in the area. It is not considered sufficient investigation has been made of brownfield sites throughout the District. It is considered for the above reasons outlined in this objection, Wyre Forest District Council should consider in more details how their sustainability Objectives can be implemented in particular transport.		
Barratt Homes West Midlands	LPPS763	Policy 33.5,AKR/14 Peal Lane	Yes	No	Yes	Effective	Capacity of AKR/14 Peal Lane site to be increased from 250 to 400. This additional development can be accommodated on site based upon enhanced school provision. Evidence of a Roman Villa to be removed as the Archaeological Assessment by the consultee has found no evidence for this on site.	The policy should be amended to advise that criteria identified in the policy are advisory and if more appropriate solutions are established, they can be departed from. The capacity of the site should be revised to be up to 400 dwellings given that it has been established the school capacity is not a constraint to the quantum of development through the EFM School Capacity Report, which has been submitted in support of these representations.	Yes	Barratt control site APR/14 – Pearl Lane, Areley Kings. They are, therefore, responsible for bringing the largest allocation at Stourport forward for development. In addition, it is our view that the capacity of the site should be increased further. We request to attend the examination in order to explain the intentions for delivering the site and to confirm how it will make a valuable contribution toward the housing requirement of the district, exceeding the current levels of development envisaged.
Warren Carol	LPPS389	Policy 33.6		No		Justified	This site was refused planning permission previously and the grounds for this are still pertinent today, namely: 1. Poor access 2. It lies beyond natural boundary of the town and would intrude into the Severn Valley landscape protection area. 3. It would be visible over a wide area. 4. Cost of development because of the nature of the soil means that any developer would maximise units built and exacerbate traffic problems. 5. Single narrow account would potentially impede	Remove this site from the local plan	No	

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							emergency vehicles gaining access.			
Yew Tree Walk Ltd	LPPS1059	Yew Tree Walk					I write on behalf of the owner of Land off Yew Tree Walk, Stourport. This land is identified at the end of this representation, as Appendix A. My client welcomes the decision to remove this land from the Green Belt and allocate it for housing and will continue to fully cooperate with due process. To date work has been undertaken to assist with site capacity studies and other baseline information. My client intends to submit a robust planning application at the earliest possible opportunity following confirmation of the change in planning status of the land. This application will be made in outline format with all the necessary attendant reports and surveys required to satiate the Development Control process. Such reports will include but is not limited to Ecology, Drainage, Masterplanning, topographical surveys and a transport assessment. All the necessary consultants have been instructed and funds are available to fund the endeavour. It is highly likely that the application will be submitted next year, and provided the DM process runs reasonably smoothly the site will be sold within 5 months of a consent. Reserved Matters submissions will need to be prepared by the housebuilder and conditions dealt with, however the site, being small in nature could be fully delivered within the first five years of the new Plan period. My client has already discussed the site with a number of regional builders who have all expressed an interest in tendering. As such my client endorses the findings of the Green Belt Review and fully supports the removal of the site from the same.			
Worcestershire Wildlife Trust	LPPS347	Policy 33.6 Yew Tree Walk (AKR/18)	Yes	No	Yes	Consistent with National Policy	The WWT believe that this site cannot be delivered in a manner consistent national policy. The WWT believe that this allocation cannot sustain the numbers of dwellings proposed, will have an adverse impact on the wider ecological network, and there is not enough suitable habitat to retain to maintain the population of reptiles and other wildlife.	We believe that this site allocation should be removed or the overall number of dwellings significantly reduced. Unfortunately we cannot recommend an 'acceptable' number of dwellings as this would be dependent on the findings of additional ecological surveys, suggesting that at this stage deletion of the site could be the most	No	

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								appropriate way forward.		
Pre-submission Anonymous	LPPS933	Policy 33.6, Yew Tree Walk, AKR/18					I have always lived in the area adjacent to the above location and have no memory of sand or gravel extraction at this site for more than eighty years. The elevation of the site makes it liable to flooding which would be impractical. The tip had other materials than flyash or clinker dumped, seemingly quite casually.			
Pre-submission Anonymous	LPPS937	33.6 Yew Tree Walk					We wish to strongly object to the proposed development of Patrick's Field, Stourport on Severn. This is on several grounds including traffic congestion both during and after the construction process, the impact on wildlife and the potential detrimental effect on local house prices. The development could also have an impact on the safety of children attending the two local schools, simply through increasing the traffic flow, particularly at peak times. We would like these concerns included in the considerations of the Planning Committee and would welcome being informed of progress and the eventual outcome.		No	
Moore Debbie	LPPS393	Policy 33.6		No		Justified	Traffic on estate and surrounding areas. Potential health hazards in site clearance Loss of habitat Inconsistencies in the plan Poor knowledge of the site Access road too narrow Schools already at capacity Restrict access for emergency vehicles Lickhill Road already a know problem area for speeding - this would be made worse by increase of approximately 150 on to estate		No	
Tindell Keith	LPPS395	Policy 33.6		No		Justified	Traffic on the estate and surrounding areas Potential health hazard in site clearance Loss of habitat Inconsistencies in the plan poor knowledge of the site		No	
Beach Denise	LPPS397	Policy 33.6		No		Justified	Pressure on roads, schools and in general Destructive to wildlife Terrible access to properties Soil not fit for purpose		No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN

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Stourport on Severn Civic Society	LPPS363	Policy 33.6 Yew Tree Walk AKR/18	Yes	No	No	Justified	Objection to AKR/18 Yew Tree Walk allocation. This had no consultation with local residents. This is a green field site which is used by local residents and wildlife. There are sufficient vacant brownfield sites within Stourport without taking greenfield land. The plan did not receive the publicity it should have done and many local people will be unaware of how it will adversely affect them. The consultation form is not user friendly and does not encourage response.		No	
Campaign to Protect Rural England	LPPS382	Policy 33.6	No	No	Yes	Justified Effective Consistent with National Policy	We are concerned about this site, as the only access is down a narrow cul-de-sac. This is suitable to the houses along it, but not to a substantially larger estate beyond it. If the site is included, the developer should be required to purchase sufficient of the front gardens of the existing houses to widen the road to match the width of the main estate roads in the area and pay for the widening. In practice this means that the residents should have a ransom strip This site represents an intrusion into the proposed Severn Valley Park, as what is currently the developed area has a generally straight edge.	Delete site AKR/18.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Gallagher Darrin	LPPS307	Policy 33.6		No		Justified	This plan is unsound due to increase in traffic from new houses which will impact immensely. School times are horrendous already and this will only get worse. Traffic tends to speed through Ribbesford Drive already and it will become a main road through to the new builds. I believe it was mentioned about protected species on that land too.		No	
Harris Julie	LPPS309	Policy 33.6		No		Justified	Increased traffic on the estate and further increased congestion around the two schools on the estate. There is a threat to the habitat of the wildlife at the site. The access road "Yew Tree Walk" is narrow and restrictive access for emergency vehicles. There is also a potential health hazard in clearing the site.		No	
Trickett Barbara	LPPS311	33.6		No		Justified	The plan to develop Patricks Field will create immense traffic problems on the Lickhill Estate. At certain times of the day (8:30am and 3:00pm) the Stagborough Way road is heavily congested and indeed dangerous. The local schools do not have capacity to accommodate children from the proposed development. The local residents fear lives may be lost with a heavier volume of traffic.		No	
Knott Robert	LPPS286	Policy 33.6		No		Justified	Effect of Traffic on the Surrounding Area		No	

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							If as the local plan pre-submission publication (October 2018) page 239 policy 33 table indicates 85 dwellings on the site, which to me suggest there could potentially be approximately 150+ cars (or mixture of cars, vans, mobile homes, caravans, service vehicles etc) toing and froing along Yew Tree Walk puts pressure on to Stagborough Way and Ribbesford Drive feeding onto Lickhill Road leading up to Burlish Crossing the one way, and Park Avenue, Moorhall Lane the other way. It would be like a bottle neck on Yew Tree Walk. Looking at the number of vehicles per household on the adjacent roads, that number averages approximately 2 to 3. So the additional vehicles, increases the congestion. The amount of industry in this area has declined in recent years hence people have to travel outside the area to find work. The development of the plan (AKR/18) would potentially increase the number of persons by a multiple of 2 per household. The traffic on Stagborough Way, around the two schools, is chaotic at the start and end of the school day at present, so with the increase in number, imagine the chaos. (this is mainly parents dropping their young ones off on their way out to work). This will also increase the pressure on the schools with respect to numbers. Following on from the population numbers, pressure would be put on the NHS and GPs. Potential health hazards The ash that has been deposited would possibly need to be removed as the ground is contaminated, hence the nature of the pulverised ash would tend to create airborne dust to the surrounding area, especially along the adjacent houses. I suffer from asthma, I find this disturbing. Plus, are there any other medical problems that can be envisaged, has there been any competent professional survey been conducted to explore these concerns? Along with any future development, noise would be associated. Ground Quality Have the planners considered the ground quality, with respect to contamination of pulverised ash from the old CEGB power station being piled on the site. Was it compacted to any regulated standard of compaction? Has the ash been laboratory tested at various points, prior to			

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							this proposed plan? There is I believe a stream that runs beneath the field, and also there is a sewer pipe that runs beneath the field, whose outlet can be seen, via a brick upstand (located down where the river floods). This spills over when heavy rain or snow water overwhelms the system, hence acts as a relief valve. If the site was developed would there need to have soil removed? If it then would the land become unstable, hence possible subsidence may occur to the line of adjacent homes nearest the development. Who would be legally liable? Wildlife and Habitat The field is a haven for wildlife, with many varieties of butter flies, bees, dragon flies and similar creatures. Foxes, rabbits, squirrels, deer, reptiles, with the protected bats and badger sets that burrow into the side of the ash spoil. There is also a large bird variety, kestrels hovering in the air currents, and if you're lucky at night, the owls swooping past. Trees of various species are growing on the site which form a habitat for the bats, have been pruned by the field owner, to make way for an enclosure for cattle, this has not happened yet, but surely there may be a protection notice on these trees. The field has a nature and semi mature woodland either side of the site with interesting flora and fauna, which should be maintained for the habitat of the wildlife, surely we shouldn't be destroying wildlife habitats, otherwise we won't have any wildlife left. Green Belt My understanding was that the government policy was to retaining of Green Belt land. So by taking this site out of the Green Belt, does this create a precedent for other possible developments in the future? The site in question is part of the Green Belt along the river from Stourport on Severn to Bewdley. Once this site is developed, this section of the Green Belt has gone for ever. Contradictions People have said this site was a quarry originally prior to			

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							the ash fill. I have lived in Stourport all my lift and can't remember any of this nature. Knowledge of Site The Town Council deleted this site from the previous local plans, and also the recent consultation earlier this year due to not being suitable, retaining the status as Green Belt. So if it was not suitable then, how can be suitable now? It has been said the local town council had not been consulted, prior to this site being put into this local plan, surely they would know, or could find out the objections. The local residents could have been consulted, who would have given some knowledge and input to WFDC to consider before putting the site into the plan. I believe my concerns are valid, and the site should be removed from the local plan and retention in the Green Belt, as for the development percentage this site for would be minimal.			
Beach Susan	LPPS325	Policy 33.6		No		Justified	1. There are two schools on Stagborough Way. Traffic is chaotic at the start and end of the school day. I am concerned about the possibility of more traffic. 2. The access road is only narrow. If cars are parked there any emergency vehicles may have trouble getting through. 3. Can the local schools cope with any more pupils. 4. Can the local Doctors take any more patients		No	
Harris Peter	LPPS328	Policy 33.6		No		Effective	Increase in traffic on already busy housing estate. Poor access to proposed site. School facilities already at full capacity. HGV's would have difficulty in entering the site, one parked vehicle would make this impossible. Extra traffic on Lickhill Road, habitat loss for existing wildlife. Even existing roads are unsuitable for new volumes of traffic, extra pollution, noise, fumes, etc.	The area proposed is totally unsuitable for extra housing. If there were only 50 dwellings built that would probably mean at least 80 vehicles.		
Powell-Barnett Claire	LPPS196	33.6 AKR 18	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	I am part of Patrick's Field group. I am submitting this from my perspective as a mum and also as a childminder working from my home. I am fully subscribed and currently having a waiting list for most days. The traffic is already very challenging to navigate through to access the two schools and preschools. There is crossing patrol that does a great job of crossing the children safely but the main problem we	Leave the field to nature but perhaps make it easier for the community to access, maybe add in pedestrian gates so people are able to continue to access footpaths without having to climb through the nature reserves. Re designate the field as greenfield and Green Belt. It has never been a quarry and by national	Yes	I have a unique voice as I work and live in a house that would be directly impacted by development of this site. I have legitimate concerns for children's safety because of both traffic and ash. I have

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							encounter is cars parked everywhere including on the pavements meaning we often have to walk in the road if we cannot get past the cars parked on the pavements. If cars do not park on the pavements then cars cannot fit through the gap left on the road. It is poorly designed and can not afford to have traffic increase in this area. I worry it is an accident waiting to happen and worry for children's safety. I have heard of children being knocked into by reversing cars and I feel this whole situation has been overlooked by the local plan. The field is made up from power station ash, it was never a quarry as local historical maps can evidence. The ash lies very near to the grassy surface and is easily disturbed by tractors and other equipment. In the summer this year a fence was attempted to be erected and during the cutting of trees and clearing of grasses, ash was brought to the surface which can still be seen. Disturbing the ash created a dusty atmosphere and as our house backs onto the field, my young son was unfortunately unable to cope with this and suffered a bad asthma attack. He has never been troubled by the field before and has not since, no previous or further work has been carried out. I feel the ashy structure of the field is a threat to health when disturbed by digging, especially in young children- who I care for in my home daily. I believe it is best left undisturbed so wildlife can continue to thrive and people can continue to live healthy lives. The field is home to many different animal species - a large proportion of which are protected or rare. They thrive on this field because it is unique in its creation and content of what can grow there. The children I care for have become mini experts in identifying bird species, tracking animals and having early knowledge and access to British wildlife. This is a daily experience for them and as mentioned by the prime minister earlier this year, children should have daily inspiring experiences with nature. Changing this field would be not only disastrous to the wildlife, it would have a detrimental effect on my sons health (and others with breathing difficulties) and would be depriving many people and children of their daily access to nature.	standards does not fit criteria for brownfield. The wildlife needs protection so an accurate ecological report would be a start. Monitor the traffic on the Stagborough Way road so planners can get an accurate number of cars etc throughout the day. This road feeds into the main town or Burlish crossing. Two other sites were disregarded because of the traffic that this would also be feeding onto. These forms are quite confusing for general public and so has been the council approach and lack of transparency with need sites in the Local Plan. Only being able to upload one supporting document is not giving a balanced approach and I have heard reports of residents struggling to use the system.		directly enjoyed and been inspired by the current animal inhabitants of the site and feel they should be respected and left to thrive.
Lloyd Carl	LPPS60	33.6 AKR/18		No		Justified	Yew Tree Walk - situated midway across the existing estate and with only vehicular access to the site. No other road access possible. This means increased traffic on Stagborough Way and Ribbesford Drive both during and after construction. These roads are busy now at the		No	Yew Tree Walk - situated midway across the existing estate and with only vehicular access to the site. No

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							beginning and end of each day. Areas around the schools are very bad now. I believe schools are at capacity and extra homes, families and vehicles will make matters worse. Having lived here 40 years I am aware this is the former Stourport Power Station playing field and the area was built up with 'spoil' brought from the power station. Is this suitable ground for building? Previous requests have been turned down why? Geographically under this land and at the rear of the Riverside Meadows is an area of marshy/bog. Where is this water coming from? Wildlife including owl and buzzard colonise this area.			other road access possible. This means increased traffic on Stagborough Way and Ribbesford Drive both during and after construction. These roads are busy now at the beginning and end of each day. Areas around the schools are very bad now. I believe schools are at capacity and extra homes, families and vehicles will make matters worse. Having lived here 40 years I am aware this is the former Stourport Power Station playing field and the area was built up with 'spoil' brought from the power station. Is this suitable ground for building? Previous requests have been turned down why? Geographically under this land and at the rear of the Riverside Meadows is an area of marshy/bog. Where is this water coming from? Wildlife including owl and buzzard colonise this area.
Church James	LPPS68	Policy 33.6		No		Justified Effective	Patrick's Field Proposed Development. Constructed on tipped ash and rubbish from the power station over some years. It was then used as a sports field. When the power station was no longer, it became a haven		No	

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							for wildlife and foxes, badgers and muntjacs are common sights. Access off Stagborough Way is restricted and the prospect of additional traffic is to be a danger. I understood that the building line was not to be nearer to the river as previously indicated by the Local Authority.			
Shuttes Angela	LPPS233	Policy 33.6	No	No	No	Justified	Traffic: the number of houses proposed will increase the traffic at key times, such as school times, and make a bad situation far worse. SITE: The site is poorly filled and unstable, particularly at the edges. The process to make it suitable for development is likely to be hazardous to adjacent residents' health, based on the health of people who lived there when it was filled with PFA ash from the power station. HABITAT: Since the area was placed in the Green Belt in 1987, little has been done to the field. It has become a significant area for all sorts of wildlife, a place worthy of being treated as offset for larger development already in the plan. DEVELOPMENT: To take this area out of the Green Belt will give others the opportunity to challenge the use of other plots beyond the current urban sprawl	Retain AKR/18 within the Green Belt	No	
Martin Keith	LPPS237	Policy 33.6				Justified	Traffic on estate and surrounding area already at breaking point. Any minor accident in Stourport creates gridlock on one way system. Potential health hazard in site clearance. Loss of wildlife habitat. Restricted access for emergency vehicles. Lickhill Road already a problem area for speeding - this would become worse by increase of at least 100 cards on the estate. Inconsistencies in the plan. Poor knowledge of the site. Access road too narrow. Schools already at capacity	One road only into site would cause traffic build up trying to exit	No	
Floyd Victoria	LPPS241	Policy 33.6		No		Justified	The traffic in Stagborough Way, especially during school times, is gridlocked by the two schools there. Also, there are no turning points so cars resort to turning on private drives. As there are no extra roads to the proposed site, no new schools planned, no extra doctors and very little in the way of jobs, this site seems like madness to us.		No	
Hunt Denis	LPPS245	Policy 33.6		No		Justified	Problems with increased traffic on Stagborough Way and rest of estate. Problems with increases schools traffic and parents inconsiderate concerns for residents i.e. parking, turning on drives, etc. Noise, disruption and damage caused by construction traffic during development.		No	
Hawkins Mark	LPPS247	Policy 33.6 AKR/18		No		Justified	Traffic through the estate is already a problem with two schools at the one end. 85 new houses will further create issues in and out at either end plus Ribbesford Drive.		No	

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							Further pollution will add issues to the environment and wildlife within the area and planned site where it will be severely diminished. Planners so not appear to have given due consideration to access via Yew Tree Walk which will create many other traffic and health & safety issues. The planned site has a poor ground quality with spoil from the old power station plus other unknown elements buried to which previous prosecutions have been made and cases won.			
Booth Tim	LPPS250	Policy 33.6		No		Justified	Traffic in Stourport is already almost gridlocked. More houses will only make it worse. I have lived here 34 years and no new roads have been built and no attempt made to streamline any of the ridiculous junctions. Also this is Green Belt but it seems in name only		No	
Mills Michael	LPPS254	33.6AKR/18		No		Justified	This is Green Belt Land. Brownfield sites should be developed. Will result in increased congestion and pollution to an already congested area. Much wildlife will lose their habitat. Access via Yew Tree Walk to the site is inadequate. A sewer runs through the site which could be damaged the ground is not 'settled'. It was built up with ash fro the Stourport Power Station. Stagborough Way gets blocked in the mornings and afternoons because of the parents delivering and collecting children.			
Edwards Margaret	LPPS257	Policy 33.6		No		Justified	I wish to express my concerns as to the unnecessary intrusion into established Green Belt. This is an area of outstanding natural beauty inhabited by species of flora and fauna. The site is totally unsuitable for construction of dwellings, lacking reasonable access and will cause major problems at peak times with traffic and schools.			
Wood Kenneth	LPPS260	33.6AKR/18		No		Justified	Several mornings a week I take my grandchildren to Burlish Park Primary School in Windermere Way. I think I have the authority to speak on the traffic problems. By the Lickhill and St Wulstan's Primary Schools there is a particularly dangerous bend. Cars are always parked on either side of the road and there have been several 'near misses'. In addition Ribbesford Drive, Lickhill Road and Burlish Crossing are very busy. The Lickhill lights are a nightmare. The other route takes you past the school by the Memorial Park, already necessitating the need for ramps. You then have to take the main Stourport Road, with traffic slow.			

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							The prospect of numerous delivery vans, trucks carrying building material, diggers etc coming along Stagborough Way and having to access via Yew Tree walk which is totally unsuitable, is very worrying. I would also like to mention that when we purchased our house in 2007, our Solicitor insisted on obtaining for us an Indemption Insurance Certificate as the land on Patricks Field during the search was stated as being contaminated by years of dumped ash.			
Wood Sheila	LPPS263	33.6AKR/18		No		Justified	I have several serious concerns: 1. The traffic in Stagborough Way leading to Lickhill Road is mayhem during school times delivering and collecting children from Lickhill and St Wulstan Primary schools, as well as that affected by the two nurseries that operate at times other than the daily mornings and afternoons. Most of this traffic feeds into the Lickhill Road lights which are always slow and cause traffic hold ups. My understanding is that previous plans for development in the Burlish area were halted because of this problem. This proposed new development will impact in exactly the same way regarding traffic. Equally traffic going the other way is hampered by the other primary school by the Memorial Park and the usual traffic build up on the main Stourport Road. 2. I find it outrageous that anyone could consider access via Yew Tree Walk. The impact on residents in this small, narrow road is monumental. 3. The impact of 85 houses will mean possible hundreds of cars, even more people and children (no doubt attending the two schools mentioned). Stagborough Way just cannot deal with any more traffic. 4. The filed had fuel ash dumped in it for many years, there is a stream and a sewer running beneath it. There are protected silver birch trees (one already hacked down by the 'developer') and a great deal of wildlife. Despite comments on the document that every attempt will be made to ensure the wildlife remains, this is an insult to our intelligence. The minute a digger enters the field, all wildlife will be gone, despite badgers and bats being protected species.			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Fisher Lisa	LPPS269	33.6AKR/18		No		Justified	There is already an issue with heavy traffic on the estate especially at school times. NO emergency services are able to get through at that time. There will be a loss of habitat. We have foxes and muntjacs that can be seen on the estate at night. The plan is inconsistent, there appears to be a poor knowledge of the site and its previous use. The only access road to proposed development is far too narrow and would also restrict current residents parking outside their houses. There would be an increase of traffic on the main Lickhill Road which is already a known problem as there has been speed monitoring recently. The two schools on the estate are already at capacity. Speed of cars on Stagborough Way sometimes is ridiculous, traffic management would not address this problem.		No	
Fisher Karima	LPPS272	33.6AKR18	No	No	No		Better communication with residents of the estate. Extra access in/out of 'Wrens Nest'. Loss of habitat. Schools are already full Children learn to ride bikes on the estate with the schools Little access for emergency services Only one access road and will be far too narrow Potential health hazard from site Traffic bad enough with 700+ cars Lack of communication			
Whiteley Lynda	LPPS290	Policy 33.6		No		Justified	Traffic on the estate and surrounding areas. Loss of habitat. Inconsistencies in the plan. Poor knowledge of the site.		No	
Flavell Madge	LPPS292	Policy 33.6		No		Justified	There are various forms of wildlife which I believe are protected species. The volume of traffic in Stagborough Way is heavy especially at school times. The road leading up to the gate where a road would be built is quite narrow. The logistics of lorries, building equipment, etc is so impractical. It is not viable. Emergency services would be hampered. Also, most households have more than one car. The volume of traffic would be dangerous with two schools in the vicinity.			

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Clewes Valerie	LPPS295	Policy 33.6		No			Habitat for wild life Traffic congestion Poor knowledge of site Inconsistent plans		No	
Ward Richard	LPPS298	Policy 33.6		No			Traffic on estate is almost at breaking point during term time. Having been involved with the cycle track at Stourport I am concerned about the disturbance of the underfill.		No	
Williams Mary	LPPS310	Policy 33.6	No	No	No	Positively Prepared Justified Effective	Not legally compliant due to lack of consultation, the requirement which is set out in the NPPF. Unsound as the land does not meet the criteria for a brownfield site. Also would not help meet need for affordable housing. Not justified as not based on accurate information, i.e. the land has never been previously developed with no permanent structures or industrial use. This site has considerable value for wildlife which would be destroyed if this land is built on. The knock on effects of decontamination works would cause health problems for local residents. Hard landscaping would cause worse flowing to the adjoining land at the base of the hill.	Too late to correct lack of consultation, although this is seen as an important feature of planning in the NPPF. This land should not be names as brownfield as there is no justification this the designation should be removed and the land considered purely Green Belt, the point of which is to avoid the erosion by housing and building forward from the settlement line, which this would do. This land has high value at first sight but only by developing a few high price bracket homes will any developer have a chance of recovering the outlay entailed b decontamination of the area. This flies in the face of the Council's need for affordable housing. This area is not "shovel ready" and will mean heavy plant and poling equipment on site for months, causing great damage to wildlife, both on this field and on the nature reserve beside it. There are several badger sets in close vicinity which are long established. The local residents will have the strong possibility of disturbed pulverised fuel ash, which can easily be found just below the surface of the field, blowing into their houses from the prevailing west and south-westerly winds. At the foot of steep slope on the river-side of the plot, are several cabins which suffer from flooding at certain times of the year. The water does not come up from the river but down from the field above - hard landscaping associated with roads, paving, houses, etc would only exacerbate this problem.	No	

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Ashmore (OBE) Graham	LPPS299	33.6AKR/18		No		Justified	1. The site is currently scheduled Green Belt and is part of the Severn Valley corridor. This is an important national site and it is important that our major rivers should not run through a canyon of housing. The development proposed on the site would be an intrusion of the views from the river. 2. The land, being largely composed of unwashed ash and other debris from a power station, is unsuitable for such a development. Any unsuitable arterial from the site would need to be removed via the Lickhilll lodge housing estate which would represent a health hazard to residents. 3. Many factors of this site including the existing sewer and stream that runs below the site would severely restrict development and not achieve the level proposed in the plan. It would not be worth losing such a site for a marginal gain in housing provision; There are other sites in the district that could be developed more easily and without such an impact on the natural environment. 4. Access to the site is restricted and there would be severe traffic congestion particularly at school opening and closing times when there is already a hazardous amount of traffic in Stagborough Way. 5. The site has become a haven for wildlife - deer, foxes, toads, badgers, butterflies etc and abuts the protected wetlands site. It would be 'criminal' to lose such a site for such a marginal gain. Development of the site would undoubtedly also affect rainwater run off into the wetlands site and the Severn flood plain in general. Site AKR/18 should be removed from the sites considered suitable for housing development.		Yes	
Hicks Diane	LPPS289	Policy 33.6		No		Justified	Limited access to site. Increased Traffic		No	
Clewes Douglas	LPPS294	Policy 33.6		No			Traffic congestion Loss of habitat or wild life Poor knowledge of site Inconsistent plans		No	
Barnett Andrew	LPPS163	33.6 AKR/18	No	No	No	Positively Prepared Justified Effective	The plan is contradictory; the plan talks about wildlife but does not consider the impact of building works on habitats. It does not consider the protected species resident there or how it would affect the marshland - effectively creating an island for the inhabitants which	The council needs to amend their incorrect records of the site. The planners should visit it and also visit during peak traffic times when 500 children and their parents / carers are accessing	Yes	I have first hand experience of the traffic problems and safety issues children face along this road. I

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						Consistent with National Policy	would be severely damaging to the unique and delicate balance. The plan does not mention the ground is ash based right beneath the grass. Work in the summer (cutting down protected trees that the owners are having legal action brought against them for) brought ash to the surface. This is a serious risk to Asthma sufferers. Asthma kills 3 people a day in the UK and is not a matter to disregard. The traffic in this area is already over capacity. 500 children use the road to get to the two schools and two nurseries mere yards away. An increase in traffic whether it be construction or residential would seriously threaten the safety of these young children, some of which are only 2 years old. This has not been mentioned or considered at all in the plan. Access at times throughout the day is extremely limited due to the current volume of traffic. The access road to the site is very small and as mentioned above very close to the schools. Traffic would then feed in to the Burlish crossing road or into the main town. Two previous sites were already removed from the plan due to the increase in traffic that they would create at these very same roads. This makes no logical sense to then add in this site which flows onto the same roads but also has the worse impact on residential roads and children's safety. Very little notice has been given to residents about this, it was quietly added into the previous plan and the council did not advise there had been any changes from the advertised 2017 plan. Information requested under the freedom of information act has not been provided so information is still unknown. The plan states that the site was used as a quarry and this is incorrect and by NPPF standards this land does not meet classification for Brownfield and to call it such is false and misleading. It shows inaccurate record keeping by the council which poses the question what do they actually know about this land?	the road. I provided the planners with a sample of soil/ ash and would like to highlight that they are yet to comment on the health implications this could have. The local hospital has no a&e department so asthma attacks in an emergency are dealt with at Worcester Hospital which is 30 mins away. More time and transparency over documents in relation to duty to cooperate. Freedom of information requests dealt with as priority in such circumstances. Ecology report needs to mention active badger setts- we had an expert out in July confirming active setts. Rare birds such as song thrush and yellow hammer are present here as well as barn owls and buzzards. It makes no sense to plan for human housing when they are already thousands of homes for species of animal here- at least 10 protected ones. I'm uncertain how legal destruction of protected species is, many animals will be killed directly or indirectly by development of this site. Creating new habitats is not going to reverse the damage that will be done.		daily walk to school with 4 children and sometimes have to walk on the road as cars have left no room to walk on the pavement with a pushchair. With my son being directly impacted by ashy dust I have a valid and significant view about this.
Knott Barbara	LPPS282	Policy 33.6		No		Justified	My concerns for the proposed development of the site know as Wrens Nest and also locally as Patricks Field are: 1. Environmental		No	

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							This development would cause disruption or removal of a habitat that supports a variety of plant and wildlife. Badgers, foxes, kestrels, owls, bats and many varieties of butterfly, inspect and reptile species to name just small proportion of the wildlife this field supports. As laid out in your own studies and reports. Building here would require stabilising the ground with pilings this would impact on the Badgers. Badger sets cover an area of 100 metres any construction would drive them away. 2. Composition of the field This field was filled with ALL of the waste products from Stourport Power Station. This did not just include ash. The PFA used on this site was not compacted down and after thirty years is still moving. Ash can be seen in the field and dust can be seen in the air. Subsidence on the edges of all three sides is visible. 3. Health of residents of Lickhill Estate If this field was developed the construction equipment used would release the PDF and ash of the field causing clouds of toxic ash, which has been linked to Cancer and other ailments, to be released over the estate and further, damaging ALL our health. 4. New houses would generate more people, cars and children. Children would need more access to schools. At this present time cars dropping children at the schools on Stagborough Way block the road from 8.30 to 9.30 in the morning and this is repeated in the afternoon. These cars also block the driveways of residents causing distress to the householders who live there and some cases refusing to move. These parents leaving and collecting children don't just drop off their children but stand talking for 10, 20 or even 30 minutes. The roads on Lickhill Estate are not adequate for the potential 20 plus cars of 85 new homes. Even the 40 homes mentioned would generate 80 cars plus, as most households have a MINIMUM of two cars each.			
Brookes Ian & Sarah	LPPS67	Policy 33.6 AKR/18		No		Justified	For these houses to be built would be utter madness - it is an old ash pile, so unstable, next to a flood plain. The			

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							beautiful wildlife that resides here should be left alone. There are also issues of local roads not coping with current traffic, without adding to it. Noise pollution would also be a problem on this land as bungalows clubhouse Lickhill caravan park and steam railway make so much noise regularly.			
Perks Barbara	LPPS208	AKR/18		No		Justified	Traffic congestion and safety already been driven at on the pavement. Emergency services cannot get through. Cars reversing onto my drive, blocking in neighbours. Illegal and dangerous parking too close to junctions.		No	
Wright Robert and Jeanette	LPPS235	Policy 33.6		No		Justified	Danger of work creating a landslide which will come towards bungalow site. Health concerns of unwashed ash falling onto our site. View from Riverside would be ruined. Protect the Green Belt.		No	
Garner Anthony	LPPS240	Policy 33.6		No		Justified	I do not believe this is a sound plan due to traffic movement in and out of such a small road/entrance causing such distress and change of life to residents of long standing.		No	
Philipps Carol	LPPS243	Policy 33.6		No		Justified	Parking and cars are very most days it is very very dangerous for the children. I'm very very worried about when the building work starts and we have lorries and building vehicles. The way in and out of Yew Tree Walk is barely wide enough for two small cars. The building will be a very very big danger to the children going to and from school.		No	
Grant Carole	LPPS246	Policy 33.6		No		Justified	Stagborough Way and all access to it cannot sustain increases of up to 95 houses, approx. 180 cars and around 225 extra people. Yew Tree Walk is a very small cul-de-sac. More traffic on this estate increases safety risks, emergency vehicles would have great difficulty getting access via Yew Tree Walk. Planners have not taken account the ground quality (from old Power Station). Existing sewer beneath the site and stream runs underneath. Health - Potential hazard to health of residents in locality when earth disturbed. Safety - Risk to pedestrians (i.e. children from schools. etc) 1987 The field was withdrawn from area plan as Government Inspector ruled that the site could not be shielded from being an eyesore from the opposite side of the river due to the high density of ash on the bank leading down to Stourport Meadows. Any development would also encourage ribbon development all up the Severn Valley to Bewdley. Nothing has changed.		No	

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							Habitat - There is an abundance of wildlife at risk. Animals and vegetation.			
Ward Margaret	LPPS249	Policy 33.6		No		Justified	By taking possession of this Green Belt area to build a housing development will open up the flood gates right along the River Severn. The location of the development will cause major traffic problems along Stagborough Way and Lickhill Road. The wild life that lives on the field and surrounding woodland is wonderful and all this will be lost forever. Where possible we need to preserve beautiful locations on our planet.		No	
Hawkins Julie	LPPS252	33.6/AKR18		No			Stagborough Way and all accesses to it cannot sustain increases of up to 85 houses, approximately 180 cars and around 255 extra people. Yew Tree Walk is a tiny cul-de-sac. More traffic on this estate increases safety risk, emergency vehicles struggle at times getting through this estate with traffic as it is now! Planners have not taken account of the ground quality (from the old power station) the existing sewer beneath the site, the stream that runs underneath the field or the wildlife that uses it. Potential health hazard in site clearance. Loss of habitat for wildlife. Inconsistencies in Plan. Poor knowledge of site.		No	
Booth Marion	LPPS256	Policy 33.6		No		Justified	Traffic in Stourport is almost gridlocked. More houses will only make it worse. I have lived here 34 years and no new roads have been built and no attempt made to streamline any of the ridiculous junctions. Also this if Green Belt but it seems in name only.			
Wakefield Peter	LPPS259	33-6AKR/18		No		Positively Prepared Justified	Impact of additional traffic on existing roads. Potential health hazards and unknown consequences of ground clearance. Impact on existing road surfaces due to heavy plant and loaded vehicles. Loss of habitat. Inconsistencies in the plan in respect to Green Belt demarcation. Poor knowledge of site as indicated from available information. Pressure on existing public services (e.g. health, schooling). Potential for danger to emergency services due to access/egress from a single point.		No	
Edwards Frank	LPPS262	Policy 33.6		No		Justified	My concerns in opposing any planning consent to the Meadow are on the grounds of the unsuitability of the site, which is contaminated with hazardous chemicals derived from deposits of loose ash produced by the former power station in Stourport. Below the ground are natural water courses and if disturbed would cause			

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							pollution to the surrounding areas and into the adjacent river. The accesses to the meadow are unsuitable because of the narrow roads, designed primarily for the size of the original site and also are now congested at peak times. Further development would cause chronic overcrowding in the local schools, traffic hazards to school-children, parents and all the problems associated with general pollution and noise. Disturbance to all wildlife notably badgers, foxes, butterflies, moths, deer, all bird life, lizards, bats, etc.			
Tindell Ann	LPPS265	Policy 33.6		No		Justified	Traffic on estate and surrounding area. Potential health hazards in site clearance. Loss of habitat. Inconsistencies in the plan. Poor knowledge of the site.		No	
Hughes Gillian	LPPS268	Policy 33.6		No		Justified	Site entrance is totally unsuitable. We have enough cars parked for the schools already. Site is not suitable for building on. Only one entrance to site.		No	
Hicks Brian	LPPS270	Policy 33.6		No		Justified	Increase in traffic. Limited access to site.		No	
Hunt Valerie	LPPS274	Policy 33.6		No		Justified	Narrow access roads to the proposed site. Disruption, damage and noise caused by construction traffic. Problems with increased schools traffic.		No	
Dredge David	LPPS314	Policy 33.6		No			My wife and I have very grave concerns regarding the development of Patricks Field. We feel it is grossly unfair to the residents of Yew Tree Walk and Stagborough Way who will suffer because of the increased traffic using these roads, not only during the construction phase but also when the development is complete. We are also very worried about air quality particularly when the site is being developed with heavy machinery moving the black ash around the prevailing wind is likely to carry noxious dust over Lickhill Lodge estate, Hafren Way and probably much further. Should some form of retention wall be required around the edges of the field, unless it is built in a very sensitive manner it could, in time become an eyesore. Regarding the flora and fauna in Patricks Field you will be receiving a great deal of information from people with a great deal more knowledge about it than we have but it is an issue that needs careful consideration.		No	
Sheppard Dixon & Janice	LPPS324	Policy 33.6		No	No	Justified	Re AKR 18 Land off Yew Tree Walk known as Patrick's Field My wife and I have strong objections and deep concerns with regards the development of this site :- 1) In 1987 the site was the subject of a Government	Please remove AKR18 from the draft plan.	No	

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							enquiry. The Government Inspector reported the following:- "Any development of Patrick's Field could not be shielded from being an eyesore from the other side of the River Severn. The site is on a high plateau and trees would not grow in the ash ground as the bank on the riverside of the field is totally ash. If development took place on this field it would encourage ribbon development all up the Severn Valley to Bewdley. Nothing has changed in 2018. 2) I have been in contact regularly with WFDC Planning Department, when there has been activity on this field. The last time was I about August 2018 when the owners tried without success to dig in posts for fencing. This was abandoned after a few hours. They tried to dig into the concrete foundations of the old sports pavilion!! I have repeatedly been told by WFDC that the field was Green Belt until 2026 and I had nothing to worry about. 3) This site has been included at the last minute in the draft Plan. One of our neighbours under "Freedom of Information" has tried to get copies of correspondence between the owners and WFDC. This has been refused. 4) The land has never been used for the extraction of sand and gravel as suggested in the Kidderminster Shuttle. 5) There is a non culverted underground stream running under the field from left to right. There is also a main sewer near to existing properties. The land naturally undulating made of uncompacted ash from the former Stourport Power Station. Tests carried out in recent years reported water at 13 metres. The land is totally unsuitable for building. 6) The access to the field via Yew Tree Walk is very narrow and by WFDC own admission is POOR. Proposed development of land further up Lickhill Road North has been widthdrawn because of the impact of traffic on the Burlish Crossing Traffic Lights. Where would the additional traffic generated go - to the Burlish Crossing Traffic Lights or Lickhill Road junction with Lombard Street. 7) There are numerous contradictions in the draft plan concerning preservation of the Green Belt and this site AKR 18. 8) There are 2 schools in close proximity to the site. The traffic morning and afternoon is substantial often blocking the road for up to 250 metres. The schools are also full. there are no plans in the document for any infrastructure improvements. GP's cannot cope, Dentists books are full and where is the Stourport Relief Road still only partly			

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							built. The Halcrow Report in 2001 predicted gridlock in the next few years. In the south of Worcestershire there appears to be no problem with new roads/bridges. Why is no money spent on improvements in the north of Worcestershire? 9) There is substantial wildlife on the site, including badgers, rabbits monkjack deer and this morning I saw a very healthy fox at 9.40am. There are also rare butterflies, owls and woodpeckers just to name a few of the various wildlife. This wildlife partly comes from the adjacent nature reserve. 10) The land would require substantial soil/ash removal and piling with noise and dust affecting neighbouring properties with potential health hazards. I am informed when ash and other refuse was dumped on the site in the late 60's the residents were subjected to dust and noise for up to 6 years. There would also be the substantial nuisance of heavy lorries coming and going from the site whilst construction is underway. This site is totally unsuitable for development. Once constructed there would also be a lack of privacy. Many existing residents have very short gardens. 11) The petition submitted to WFDC contains 193 signatures against this site being in the area plan. These are almost entirely from Lickhill Lodge. If there had been more time, more signatures could have been obtained. To my knowledge, nobody asked to sign the petition refused to do so. 12) We are shocked that WFDC should include this site in the draft plan when it should have been fully aware of the substantial opposition to any development. 13) Wyre Forest has a low wage economy people buying properties on this site would have to travel to Birmingham or Worcester to find suitable work - more pollution. 14) The draft plan refers to a local bus service this only operates once every 2 hours at best!! 15) The draft plan allows for an over provision of 15%. This site would only contribute around 1% of the total requirement.			
Beach John	LPPS327	Policy 33.6		No		Justified	1. There are two schools on Stagborough Way. Traffic is chaotic at the start and end of the school day. I am concerned about the possibility of more traffic. 2. Can the local schools cope with any more pupils? 3. The access road is only narrow. Emergency vehicles may have a problem with access if vehicles are parked there.		No	

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							4. The field is a haven for several species of wildlife where will they all go?			
Perrins Kevin	LPPS330	Policy 33.6		No		Justified	As a resident of Yew Tree Walk, the road is far too narrow for the volume of traffic which will be generated by the proposed development. Loss of habitat for the natural wildlife. Potential health hazards in site clearance. Increase in traffic on the estate and surrounding area.		No	
Williams Michael	LPPS379	Policy 33.6	No	No	No	Justified Consistent with National Policy	Legal Compliance - the change in the status of this land i.e. its removal from the Green Belt resulted from the 'Call for Sites' process represents a material change to the Local Plan subsequent to the main period of resident consultation in 2017. Many residents including myself attended this earlier consultation and specifically asked those planning officers present whether any change to the designation of this land was proposed. We were reassured that no change would take place and the land would remain part of the Green Belt. This subsequent change was not drawn to the attention of residents, who are now being told that they can only comment on the grounds of legal compliance and/or unsoundness and that all comments will be passed on to the Inspector without further review. We have been given approximately 7 weeks to respond to what is a new element to the plan and one to which we were not previously aware. This is not what is demanded of local authorities by law and fails to comply with the duty to co-operate and NPPF July 2018. A change of this nature should have been specifically drawn to the attention of local residents who should have been given the opportunity to make wider comments on the merits or otherwise of what is proposed. Councillors should also be given an opportunity to reflect on resident opinion and make changes to the local plan as necessary. The fact that proper and adequate resident consultation did not take place means that the plan is not legally compliant. Why the plan is unsound 1. The underlying basis on which the removal of the land from Green Belt is justified (33.11) is that the site was previously used for the extraction of sand and gravel and therefore the site can be viewed as pre-developed. This is incorrect. The site was formerly agricultural land and orchard and was then used for the dumping of pulverised fuel ash from Stourport Power Station. Sand and gravel extraction have never taken place from this site. 2. Because of the nature of the sub-soil and the fact that is classed as contaminated land for any development to take	The number of dwellings that could be constructed here in reality is much less than the number stated. Overall, the contribution this site would make to meeting perceived housing need is very small. Given that more land is being proposed for allocation than is recommended by Government, given the constraints to development and the importance of this site to the Green Belt, the inclusion of this site must be viewed as being unsound. Taking land out of the Green Belt is a serious step and should only be considered as a last resort. The local plan fails to justify why this land should be taken out of the Green Belt and it should therefore remain.	Yes	I wish to be able to put forward my views in person and contribute to a better understanding of the ecological importance of the site.

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							place means it will need to be capped and dwellings piled. This process requires the use of heavy machinery plus considerable ground disturbance and the probably importation of topsoil from elsewhere, a process not compatible with meeting the ecological requirements set out in the policy i.e. maintaining wide buffers around the site, retaining areas of tussocky grassland. 3. Given the constraints of the site, it would be completely impossible to achieve the 85 dwellings suggested in the plan. As well as the ecological aspects, some of which but not all are acknowledge, there is also a min sewer crossing the site which places further constraint on land available for building. 4. The ecological survey on which the mitigating policies are based is weak, is not sufficiently thorough, under-estimates the wildlife value of the site and does not take into account the importance of the site within the wider landscape. The site forms an important part of an important wildlife corridor stretching along the River Severn stretching from Moorhall Lane to the Lickhill Caravan Park and cannot be looked at in isolation. Damage to this site, which is inevitable if dwellings are constructed here, will affect not just this site but the whole corridor including the local nature reserve at Moorhall Marsh. It is not true that the land "plays a limited role in fulfilling the Green Belt purposes". Indeed this is contradicted elsewhere in the plan where it states that this land meets four out of the five principles of Green Belt. 5. The inconsistency within the plan is further illustrated by the reference (point 8) to the need for "rear gardens to be permeable to wildlife to maintain the site's function as a green corridor" when the construction of the dwellings themselves will effectively have destroyed this. 6. Emphasis given to bats and hedgehogs demonstrate a lack of awareness (point 7) of the wildlife that occur on the site and which are important in a local context. Much of the importance of the site stems from the vegetation that has developed on poor quality soils over many years. This vegetation supports many plants and insects which require further study. It is not just bat and reptile surveys that are required (point 4). There are active badger setts present and badgers are regularly seen crossing the field. It is an offense to knowingly destroy setts or disturb areas of land which badgers inhabit and given the frequency of sightings and obvious signs of badger activity throughout the site it would be extremely difficult to achieve this. A			

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							large number of butterflies and moths occur including species that are uncommon elsewhere. Recent research has shown how moths in particular are adversely affected by levels of light pollution (point 6). 7. Any consideration of a wetland feature on the south side of the site (point 3) would need to take account of existing features of wildlife interest and would be no compensation for what will be destroyed. 8. Moves to restrict public access to the site (point 5) are inappropriate and likely to result in claims of adverse possession. The local community have always enjoyed full access to the site. Any future woodland management plan (point 9) should honour this right of access, take account of those animals present (which include Muntjac deer) and only be agreed after resident consultation. 9. Any construction here will be visible from across the valley (33.11) and it will not be possible to avoid this as the existing line of development can already be seen. It will also be extremely difficult to integrate with existing development as it will jut out from the existing housing line and inevitably lead to further proposals to build on Green Belt land. 10. Access to the site has not been properly considered. The proposed access via Yew Tree Walk is very narrow and currently a quiet, residential cul-de-sac. The use of this road by construction traffic would be very difficult to achieve and would involve such traffic passing through the Lickhill Lodge estate. This would cause major issues for local residents with noise, pollution and danger to safety being the inevitable outcomes. These were some of the main reasons why the Inspector turned down previous attempts to build housing on this land at the 1987 Public Enquiry. Access remains unchanged while the traffic situation has worsened. The Local Plan fails to take these matters into account. 11. Any development on this site would contribute significantly to existing problems of traffic congestion particularly caused by parents taking children to local primary schools. 12. No consideration has been given to matters of infrastructure. Both local schools are operating at full capacity and are not able to accept additional children meaning from any new development.			
Gallagher Margaret	LPPS306	Policy 33.6		No		Justified	This plan is unsound due to increase in traffic from new houses which will impact immensely. School times are horrendous already and this will only get worse. Traffic		No	

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							tends to speed through Ribbesford Drive already and it will become a main road through to the new builds. I believe it was mentioned about protected species on that land too.			
Bettridge Peter	LPPS348	Policy 33.6		No		Justified	Yew Tree Walk is shown as the access road to the proposed development yet it is only approximately 5 metres wide and was designed as a cul de sac to serve five houses. It seems totally unsuited to carry the anticipated traffic of a development of 85 dwellings and unless an alternative means of access to the proposed site can be arranged I consider the proposal should be rejected. This is my main objection to the proposal but I understand there are other issues regarding the condition of the site ground but these are technical and would presumably be reconciled by discussion between the developers and the planning department. Obviously agreed on these matters would be necessary for the development to proceed.	An alternative access road to the site.	No	
Miltadou Charlotte	LPPS390	Policy 33.6		No		Justified	Next to Lickhill Primary School and St Wulstans School the traffic is chaotic already, never mind adding more houses to the estate which will result in more cars and more children going to these schools. Cars are parked on both sides of the road on all surround cul de sacs and Stagborough Way until you get half way down the estate. I've even had people trying to park their cars over pavements and I've been walking on them with my children and there is barely enough space to get passed some cars. I can't see how the roads around the estate can cope with more cars. A few years ago there was an incident where the fire engine couldn't get down the road with cars parked either side, it's dangerous around here at school times, I fear for the safety of the children getting to school. It is also a concern about the wildlife that live in the field and that this was Green Belt land. I am also concerned about the quality of the site. I believe the site was used to dump ash from the power station and can't imagine the ground being of good enough quality to build houses.		No	
Moore Peter	LPPS392	Policy 33.6		No		Justified	Traffic on estate and surrounding potential health hazard. Areas in site clearance. Loss of habitat. Inconsistencies in the plan Poor knowledge of the site		No	

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							access Road too narrow Schools already at capacity Restricted access for emergency vehicles Lickhill Road already a known problem area for speeding. 150 extra cars would result.			
Hicks Anna	LPPS394	Policy 33.6		No		Justified	Drainage (stream under site) Loss of habitat Insufficient knowledge of site Loss of Green Belt Health hazard when site cleared (contaminated land) Access problems via Yew Tree Walk (see also previous planning refusal) Increase in traffic on the estate and Burlish crossing		No	
Robin Peter	LPPS396	Policy 33.6		No		Justified	Planners haven't taken into account the quality of the ground upon which countless ash from the old power station as dumped, the existing sewer beneath the site, the stream that runs underneath the field or the wildlife that uses it. The increased traffic that will be using the existing road system which is already extremely busy at the beginning and the end of the school day due to parents picking up and dropping off their children at the two schools that are off Stagborough Way.		No	
Beach Chris	LPPS398	Policy 33.6		No		Justified	Increased traffic on existing road system Pressure on schools in the area Destruction of wildlife habitat		No	
Friends of Patrick's Field (Shuttes)	LPPS514	Policy 33.6	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	*" To be legally compliant the Local Plan has to be prepared in accordance with the Duty to Co-operate and legal and procedural requirements, including the 2011 Localism Act and Town and Count Planning (Local Planning) (England) Regulations 2012 (as amended".* *Given that we have had less than 7 weeks in which to digest, research and respond to the array of documents relating to Policy 33.* 6, *this does not meet the requirements of the Duty to co-operate. This places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local and Marine Plan preparation in the context of strategic cross boundary matters.* *We do not consider the Local Plan to be sound as in*	*We consider that removing Policy 33.6 - AKR/18 from the Green Belt would be wrong.* • *It would have a negative impact on the Severn Valley Corridor and open the floodgates to future encroachment.* • *It would exacerbate already severe traffic congestion around the 2 schools off* *Stagborough Way and also the Tan Lane school and the 12,inch points at either end of Lickhill Road.* • *Reduce the biodiversity in the Severn Valley Corridor.*	Yes	*As we have not had sufficient time to in which to digest, research and respond to the array of documents relating to Policy 33.* 6. *We are still waiting on responses from the council and other bodies and they are unlikely to be received before the 17h December 2018 deadline. We would want to have the opportunity to deliver*

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							particular to Project 33.6 - AKR/18 it is not Justified, Effective nor Consistent with national Policy. *Within the limited time that we have had to prepare a full submission, please find our current detailed submission in the accompanying document*	*As part of the recently published Net Gain initiative which sets out to increase the biodiversity of any future planning, Policy 33.* 6 *could be used to offset any loss of biodiversity in other areas of the Local Plan.* *The Policy 33.*6 *should be amended to protect the Green Belt and ensure that the land is developed to provide more social and leisure facilities within the Local Plan area and ensure that the rich ecological system that has developed from the re-wilding of the land should be enhanced.*		*further findings that may provide a more cogent response.*
Landowner Lickhill, Stourport	LPPS754	Policy 33.6 Yew Tree Walk, AKR/18	Yes	No	Yes	Justified	Believes that the selection of site AKR/18 is not justifiable based on a number of issues including environmental, ecological, and vehicle access factors. The building height could dominate views from the Severn Valley and do the local schools have the capacity for this additional development?	To reconsider other sites with fewer constraints e.g. Lickhill Road North that have been declined for inclusion in the Local Plan. In previous Stourport Greenfield document in Local Plan Selection Paper it was considered possible to deliver infrastructure improvements at Burlish Crossroads. Therefore Junction improvements should be facilitated to ease congestion. Consideration should be given to building height.	No	
Landowner Lickhill, Stourport	LPPS756	Policy 33.8, site LI/11	Yes	No	Yes	Justified	Selection of site is not justifiable based on the pre submission plan not discussing any proposed improvements to the Kingsway Junction, this will be a loss of Green Belt land, and the impact on local schools-is there capacity for the additional pupils from this development?	.In previous Stourport Greenfield document in Local Plan Selection Paper it was considered possible to deliver infrastructure improvements at Burlish Crossroads. Therefore Junction improvements should be facilitated to improve access between Stourport, Bewdley and Kidder-minster to ease congestion. To reconsider other development sites at Lickhill Road North that have been declined for inclusion in the Local Plan that have fewer constraints. The council should be encouraging the use of land for recreational activities and not building on it. With all the proposed building in the area would it not be sensible to re-establish the Coniston Crescent school as an extension of the existing	No	

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								Primary School which lies adjacent to this site.		
Moore David	LPPS385	Policy 33.8		No		Justified	For the attention of the Government Inspector and WFDC Planning Committee, I strongly make the following bullet points and fully expanded comments for submission against the use of LI/11 and MI/38 for residential development. 1. Unacceptable to use Green Belt before all brownfield sites have been exhausted. 2. Sites LI/11 and <I/38 were added to the plan recently and need to be withdrawn from the plan for the exact same reasons that LI/2, LI/5 and LI/6/7 were withdrawn. 3. There has been failure to publicise the consultation effectively. None of the residents on the perimeter of were notified of any impending consultation. 4. Unexploded bomb on site, potential flooding and contamination problems on site as shown in recent surveys. In the first instance, I feel it is unacceptable that Green Belt should be used for residential development before the use of all brownfield sites, i.e. that they have been actually built on. And completely appalling to find out at the eleventh hour that before the final consultation period commenced 1 Nov 18 the Council had removed LI/11 land off the Green Belt register ready for residential development showing clearly that they had already concluded the end result of the consultation before if ever began, not informing the potentially affected rate payers, i.e. the residents that the site was at risk, as it had been recently added to the plan. Safety Issues re the access to sites LI/11 and MI/38 - The Kingsway is a narrow lane without any footpath on either side which is already subject to regular congestion and becomes a "rat run" when there is any sort of hold up (whether major or minor) on the A451 into Stourport. There is already daily substantial traffic to and from Stourport High School, nursery and Sports Club. Any increase in traffic would cause a severe safety hazard to pedestrians, cyclists and anyone using the new proposed country park and would create a situation of an accident waiting to happen and therefore would be madness to contemplate! The majority of the substantial extra traffic created by 315 new dwellings would exit these sites turning left down Kingsway to avoid crossing the main A451 to miss an congestion on entering Stourport and accessing Bewdley and would automatically go through	Remove sites LI/11 and MI/38 from Plan	No	

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							the Burlish traffic lights and B4195 which was the actual reason sites LI/1, LI/5 and LI/6/7 were removed from the original proposed plan because of the congestion caused and to be increased by the waiting/queuing air polluting traffic at the four way traffic light system currently in operation. Local Councillor Autumn Newsletter states LI/11 and MI/38 have been added to the plan as a compromise but all sites mentioned above display without doubt the exact same objections. It is quite obvious sites LI/11 and MI/38 should also be removed from the plan. We have not had the same chance as the residents involved with LI/2, LI/5 and LI/6/7 making us totally disadvantaged from a lack of time perspective and having to use confusing Government forms, which Councillors agreed were difficult to understand, than able to object in letter form as in the first consultation. Council and Councillors seemed unable to deal with the matter in a professional way many giving conflicting information making residents feel that they have been deliberately put in a position of fait accompli giving a variety of poor/lame excuses i.e. notice in the library which many never use, to the point of giving an automated email response saying it would not be available until it was too late i.e. 17th December 2018 from the Head of Planning who we were advised by our local Councillor we could contact for help with this important matter. I would challenge you and have challenged council representatives that if you were put in the exact same position you could not feel anything other than deliberately let down, made to feel disadvantaged so that the council could go ahead without our right to appeal the late inclusion of LI/11 and MI/38 by withholding the relevant information we as rate payers are entitled to which failed to afford us uniform democratic rights and has been unjust and unfair. This is the second time in a short space of time that the Council Planning Department has failed in their duty to notify residents of impending developments on the golf course which was so serious that it generated an apology from Chief Councillor. If the Council feel that part of the old Wyre Forest Golf Course needs to be developed, the only part of the golf course that would benefit from development is the part/site adjacent to the A451 immediately opposite the Stourport Waste Tip, well within the boundaries of Stourport. It is at present due to bad management and poor planning a terrible eyesore but available to be developed.Traffic from that site would be channelled on to the dual carriageway, not a lane,			

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							removing the localised congestion to Bewdley Road traffic lights: 1. Making the area safer 2. Removing the current "blot on the landscape" which would then be put to better use providing the houses needed. Aside from all the above mentioned, the land LI/11 is and has been well maintained by local residents giving outdoor pleasure and well being to humans (which supports Government mental health issues) and is a continued habitat for skylarks, badgers, Muntjac deer and a variety of other plants, insects and wildlife, which is now being continued by the rangers and should continue indefinitely for the good of all.			
Pre-submission Anonymous	LPPS944	Policy 33.8					The plan to have access to this area from Kingsway is likely to be a dangerous decision as this road is narrow with a blind bend. It is already used by drivers that do not respect either the speed limit or the fact that pedestrians and horses on the road. At present cars are parked by the allotments and unless a parking facility is planned for these allotments, this will be an added danger to both vehicles and pedestrians. The additional traffic will also cause problems for persons using the Sports Centre. Is there a plan to put a controlled pedestrian crossing to enable people to cross safely? Is a pavement planned for the length of Kingsway for pedestrians? There is no mention in the plan for additional school places or a Doctors surgery. Our schools and Doctors are already oversubscribed. I also think the ground between Stourport and Kidderminster is in danger of being used to join Stourport and Kidderminster together. I have made my comments in good faith and hope they will be taken into consideration.			
Sport England	LPPS285	33.14		No		Positively Prepared Consiste	Sport England objects to the allocation of the following sites:	The allocation of site LI/11 for employment development does not accord with guidance in paragraphs 96 and 97 of the NPPF.	No	Amend Table 33.0.1 to remove allocations LI11 or to amend the wording of policies

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						nt with National Policy	• LI/11 Land west of former school site Coniston Crescent Paragraph 96 of the NPPF sets out that planning policies should be based on robust and up- to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate. Paragraph 97 of the NPPF states that existing open space, sports and recreational buildings and land, including playing fields should not be built on unless: a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current for former use The Council's Playing Pitch strategy identifies that there are shortfalls of provision to meet quantitative needs for football (including the need for additional match sessions on grass pitches and additional 3G artificial grass pitches), and rugby union, with provision for cricket and hockey currently being met. Future demand at the end of the proposed plan period (2033) to take into account population growth is also assessed where existing shortfalls of provision are maintained or exacerbated. LI/11 Land west of former school site Coniston Crescent This allocation would result in the loss of an existing sports facility at the disused Burlish Golf Course. The Council's playing pitch strategy does not assess the need for golf courses. No evidence has been prepared to demonstrate that the golf course is surplus to			33.8 to require equivalent or better provision of sports facilities in quantity and quality in a suitable location in accordance with paragraph 97b) of the NPPF.

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							requirements to address paragraph 97a). The site adjoins existing playing fields. Additional playing field provision in this location could therefore make a positive contribution to addressing identified needs set out in the Playing Pitch Strategy (in the event that the golf course was demonstrated to be surplus to requirements). The Council's Built Sports Facilities Strategy identifies the need to make qualitative improvements to existing sports halls and swimming pools at existing school sites and to provide new/improved facilities including potential replacement of the athletics track at Stourport Sports Club close to the golf course site. There is therefore the potential to invest in alternative sports provision close by that would align with this evidence base. There is no provision within the policy allocation for securing equivalent or better re-provision elsewhere to address paragraph 97b) in accordance with the evidence in the Playing Pitch Strategy. Therefore, the allocation of this site for employment development does not accord with the guidance in paragraphs 96 and 97 of the NPPF.			
Burlish Concerned Residents	LPPS177	Table 33.0.1	No	No	No	Justified	This submission is on behalf of Burlish Concerned Residents group. The group includes upwards of 50 (and rising) residents of Burlish Park Estate who wish to speak with one voice to register their disquiet, unease and anger at the cavalier manner in which WFDC has unilaterally and without proper consultation made last-minute changes to the Local Plan. This site was removed from green-belt in mid-October 2018 and added to the Revised Local Plan in November 2018, only 6 weeks before the final submission of the plan, a process which began in July 2013. Eight public drop-in sessions were held through 16th to 30th November 2018 so leaving only 2 weeks for concerned residents to collaborate, liaise with local representatives, consult outside organisations and prepare submissions. Beyond these sessions and a notice on the Council's website no official publicity was distributed to draw resident's attention to the last-minute inclusion of this site in the revised Local Plan. Alternative sites nearby in the same geographical area as this site were included earlier in the gestation of the Local Plan. These sites were dropped at some time during 2017-18 for the reason that they would impose unacceptable	1. This site should be returned to green-belt immediately and be the subject of proper, public consultation as to whether it should be removed or remain green-belt. 2. The Local Plan should be 'paused' while residents are given the same opportunity to review the sites added to the Local Plan at the last-minute as was afforded to sites considered last year.	Yes	I wish to exercise my democratic right to participate

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							pressure on local infrastructure; specifically roads and road junctions. This site will utilise the exact same roads and junctions and will inflict similar, unacceptable pressure on them as were the cause of sites being withdrawn from the Local Plan earlier in the process. While this site was within the green-belt and allocated for sporting use it was managed as a golf-course which allowed a number of sensitive species to colonise the land including skylarks. The overall consultation process has favoured comments from residents regarding sites included early in the formulation of the Local Plan and disadvantaged those wishing to comment on the handful of sites added at the very last minute who have been presented with a fait accompli. The same consideration and assessment afforded to the 'early' sites should be given to the 'last-minute' sites. To do otherwise is not fair or democratic. Addendum Until recently, this site was actively run as part of a golf course by private company who leased the land from WFDC. That business failed due to overly ambitious plans to landscape the course over-stretching the business for which planning consent was inappropriately awarded by WFDC in 2015. Neighbouring residents were not informed of this planning consent at the time, an omission by WFDC which elicited a formal letter of apology from the council leader to those residents kept in the dark. It seems that council is attempting to repeat the same evasive tactics in 2018.			
Hunt Julia	LPPS180	L1/11	No	No	Yes	Justified Consistent with National Policy	According to the National Planning Policy framework, land should only be removed from the Green Belt in exceptional circumstances. Housing in this case does not represent exceptional circumstances. There are protected species of wildlife on this land, including pipistrelle bats, skylarks as well as badgers, buzzards and foxes. The High School has very few additional school places available and Windermere Way is already severely congested on a daily basis due to the current school traffic. The appropriate infrastructure is not in place to support an additional 318 dwellings. Further consideration should be given to other brownfield sites rather than look to remove sites from the Green Belt.		No	
Turner Peter & Joanne	LPPS303	Policy 33.8		No		Justified	We purchased our property on 30th July and at no time did our searches indicate any property development on the old golf course. This land is being used increasingly by local residents for a much needed recreational area. The	By removing policy L1/11 it will defer building works close to existing residents and continue to allow the area to be used as a recreational area. There will also be better access and less	No	

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							wildlife on the golf course is increasing with regular sightings of barn owls, kestrels and buzzards. We have also had a newt in our garden pond. We are also led to believe there is an unexploded bomb of this site of the old golf course, near to the existing crater. This area is also a soak away from existing higher grounds. The lack of notification also indicates the local council wishing to submit plans on the quiet or underhandedly.	disruption if the Zortech Avenue side of the old golf course was built on as it already has better vehicular access in place and will be less disruptive to residents. This area of the old golf course is also less used.		
Hunt Julia	LPPS186	L1/11 33.8	No	No	No	Justified	According to the National Planning Policy Framework, land should only be removed from the Green Belt in exceptional circumstances. The housing proposed in this case can not be regarded as requiring exceptional circumstances. There are protected species on wildlife on the land in question, including pipistrelle bats and nesting skylarks, as well as badgers, foxes and buzzards. The current infrastructure will not support the additional 318 dwellings (including MI/38; the High School has very few additional school places available the Windermere Way is severely congested every morning and early afternoon, at the time of the school run. Further consideration needs to be given to developing brownfield sites across the county before removing valuable land from the Green Belt. The consultation period should be extended to allow for proper consideration of other options, particularly as a number of sites, including this one, have been added at the very last minute with insufficient time to consult and respond.		No	
Byrne Julie	LPPS171	Land west of former school site Coniston Crescent LI/11 (9.52Ha)	Yes	No	No	Positively Prepared Justified Effective Consistent with National Policy	I am well educated but have no idea what these questions are asking, I just wish to object to the plans being made on the old Burlish Golf Club site. This hasn't been properly consulted with the local residents. How on earth will the local area and Kingsway cope with the level of traffic 315 homes will make?? I believe the other site at the top of Kingsway was scrapped for the same reason and that was only 80 odd homes?	Other sites need to be proposed. How has the Green Belt been lifted so easily? How will provisions be made at the local schools, how will the roads be regenerated to cope with the volume of traffic, where will the entrances be? I believe it says Kingsway but can't see how that tiny road will cope?	No	
Jones Alan & Stephanie	LPPS333	Policy 33.8		No		Justified	We live overlooking the golf site, which was a main reason we bought our property. Most people have lived in these houses for years. The noise and mess would be terrible. I feel the site should be for housing where all the dirt has been dumped and left where no property would be disturbed. Leave the back of our houses for the wild life that is there.	Have also heard rumours that there is an unexploded bomb from the war there. Would also state we were not given much time to express our views on this planning due to no letters or seen advertisement only found out due to neighbours. Again we feel that there are plenty of other Green Belt sites available which can also be changed like the golf course has.	No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 33: STOURPORT-ON-SEVERN

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Pre-submission Anonymous	LPPS943	Policy 33.8, Land west of Coniston Crescent, LI/11					I understand that the highways department have made no objections to this proposal, a development that will devastate the local road system which already can't cope, what do we pay the highway department for? We are unable to access the roads for many hours of the day and these additional houses in one area will make the roads near impossible to use. The Green Belt has now been removed which no one knew about. Stourport-on-Severn is now according to this plan part of Kidderminster, who decided that we were going to have one huge estate which will devastate local services such as schools and doctors?			
Pre-submission Anonymous	LPPS315	Policy 33.8, Land west of former school site, Coniston Crescent LI/11					I wish to raise a grievance, at the very idea, you would even consider potential development, up the burlish area, on the old Wyre Forest golf course, between the school and housing estate. . There is not much Green Belt land around the area in which people can walk and enjoy the country side. Surely you would like to maintain a little bit of Green Belt area that we have! This is one of the attractive points of Stourport that brings people in, why on earth would you want to build on it? We might as well live in a city!! As a parent of three, I understand that we need more housing, but destroying perfect Green Belt land, what future are we actually leaving our children? Please take this as a strong objection, against any motion of building on this land. I wish to be kept informed, of any plans for the project to proceed.			
Pre-submission Anonymous	LPPS948	Policy 33.8, Land west of school site Coniston Crescent LI/11					I attended a public meeting on the 4th Dec where plans were being discussed regarding the former Wyre Forest Golf Course and the suggested proposals were discussed with council representatives There has been land set aside which is in the hands of the countryside team but I am writing to strongly object to the land which has been identified in the local plan review as an area for potential development. We view this as a blatant disregard for local residents in an area which already suffers from congestion the Kingsway and Windermere Way are already used by many as a Bypass and if any of your council representatives have carried out a survey this would become very apparent I			

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							very much doubt this has been taken into consideration. The Schools are already full and congestion around the Burlish Primary school is a major issue and at times unsafe, getting an appointment at the local doctors is challenging enough but these proposals would make it impossible if houses were built in this area, Perhaps your focus as a council should be to keep this children safe whilst travelling to and from school rather than selling land off to make major profits. The plans for a Nature Reserve are good but this will also add to congestion with plans for a Cafe and Bike repair shop within the reserve. You also have driver speeding issues on the Kingsway which have never been addressed and as you have many children crossing here to access the sporting facilities and high school you have a duty of care to put some restrictions in place. The site of the old Burlish Park middle school is riddled with Asbestos and when it was in flames last year this posed a major threat to the residents nearby and don't see anything being done about this. We strongly object to any Housing development being built on the old Wyre Forest Golf Course site and we look forward to your response.			
Pre-submission Anonymous	LPPS950	Policy 33.8, Land west of school site Coniston Crescent LI/11					I attended a public meeting on the 4th Dec where plans were being discussed regarding the former Wyre Forest Golf Course and the suggested proposals were discussed with council representatives There has been land set aside which is in the hands of the countryside team but I am writing to strongly object to the land which has been identified in the local plan review as an area for potential development. We view this as a blatant disregard for local residents in an area which already suffers from congestion the Kingsway and Windermere Way are already used by many as a Bypass and if any of your council representatives have carried out a survey this would become very apparent I very much doubt this has been taken into consideration.			

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							The Schools are already full and congestion around the Burlish Primary school is a major issue and at times unsafe, getting an appointment at the local doctors is challenging enough but these proposals would make it impossible if houses were built in this area, Perhaps your focus as a council should be to keep this children safe whilst travelling to and from school rather than selling land off to make major profits. The plans for a Nature Reserve are good but this will also add to congestion with plans for a Cafe and Bike repair shop within the reserve. You also have driver speeding issues on the Kingsway which have never been addressed and as you have many children crossing here to access the sporting facilities and high school you have a duty of care to put some restrictions in place. The site of the old Burlish Park middle school is riddled with Asbestos and when it was in flames last year this posed a major threat to the residents nearby and don't see anything being done about this. We strongly object to any Housing development being built on the old Wyre Forest Golf Course site and we look forward to your response.			
Green Catherine	LPPS1050	paragraph 33		No		Justified Effective	I do not consider the planning for 2 new housing developments (Map ref: M1/1, M1/38) to be sound for the following reasons: 1. Para 4.2, section 13.6 transport access and sustainable future The proposed building developments were not on early planning development submissions and so this is the first and only opportunity to comment upon them, which is totally unfair as the final date for comments is 17th December 2018. I do not accept that the council has sufficiently considered and justified all the factors that will impact on the existing housing area and traffic chaos created at the start and end of the school day and rush hours, at 2 major road junctions. The council had already recognised that a previous planned development (L1/2) would impact on the traffic chaos, but this newly	That housing development should not go ahead, but be given over wholly to the extension of Burlish Top nature reserve.	No	

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							proposed development does nothing to negate the issue. The existing housing estate, Burlish Park, already suffers from poor parking provision for parents collecting and delivering pupils to two schools, causing chaos as parents jostle for parking spaces on the main route through the estate, Windermere Way and all streets off it. Children from the High School are often seen to wander dangerously through the traffic melee as they try to access the cars at the end of Windermere Way and Kingsway. I can see no way this will be reduced by the new developments, as both are also rat runs, accessing the same major junctions. Whilst this plan states the new houses would be accessed from Kingsway, this may not be the case in future. The extension of the Burlish Top Nature Reserve could exacerbate these issues were the housing development to continue, as it needs a car park which would again lead off Kingsway. Stourport very much needs the Nature Reserve to ensure that Kidderminster and Stourport are clearly defined and not one long conurbation. Its Green Belt status has been removed which is concerning as the council could then decide further building development in the future could be carried out on this land. The estate itself is poorly served by public transport which might have relieved some of the congestion. 2. M1/38 This Site is surplus to educational Needs The document justifies this development, as the pupils from the original Middle School on the site are now incorporated into the provision by the new Burlish Primary (rebuilt and opened in 2014 following Wyre Forest reorganisation in 2007. However the new site runs along side M1/38 means there would be no where for it to extend to accommodate the probable extra pupils. In the Burlish Primary Ofsted Report of July 2018, the schools numbers were listed as 471, but with an authority allocation of 420. How could that school accommodate further pupils in its immediate catchment area. The very building of more houses on this land would mean no room for it to expand in future years. This policy states that by selling land M1/38 (30.33) after being permitted to build on existing playing fields to			

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							create a new Sixth Form Centre, The Stourport High School exceeds the playing pitch requirement already, but is to have an extra 30 pupil intake foe the next 5 years. It has agreement to use the Stourport Sports Centre facilities to make up this discrepancy. However this statement does not take into account that the school has to pay to a high sum do this and that in the current economic climate, that in itself may not be sustainable.			
Place Partnership Ltd	LPPS683	Policy 33.9	Yes	Yes	Yes		The County Buildings site in Stourport-on-Severn provides a very significant brownfield regeneration opportunity in the town. The site is triangular and bounded by Foundry Street, Bewdley Road and Worcester Street. The buildings themselves are part two and three storeys in height, constructed of concrete frame with brick infill and there is undercroft parking beneath In the existing Site Allocations and Policies Local Plan (adopted July 2013) the site is already allocated for the following mix of uses by Policy SAL.STC2 – Tan Lane and County Buildings: • Residential (Class C3); • Community Use (D1, including police and fire services); and • Commercial uses (offices) It was though not possible to redevelop the site during the current development plan period as alternative locations for the existing occupiers had not been found. These are: • Hereford & Worcester Fire and Rescue Service (HWFRS); • Stourport Health Centre (NHS GP Surgery); • Mobile phone masts (EE) located on roof; and • West Mercia Police (WMP). However, HWFRS were granted planning permission (18/0034/FULL) on 20 March 2018 for the construction of a new Emergency Services Hub in Kidderminster. Once complete this new facility will replace all three existing fire & rescue stations in the District, which are in Kidderminster, Stourport-on-Severn (County Buildings site) and Bewdley. All three sites are intended to provide positive opportunities for regeneration and the receipts generated will go towards the cost of the new Hub, which is scheduled to become operational by the end of 2019. At the time of writing WMP are in the process of moving out of the County Buildings site and re-locating to the Stourport Civic Centre (known as 'The Civic'). This will be completed by Spring 2019. The other two occupiers are subject to leases that expire	Not applicable.	No	Whilst we do not consider it necessary to participate at the oral part of the examination, we would be happy to do so if the Inspector considers this to be beneficial to proceedings.

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							by the end of 2021, whereupon the whole County Buildings site will become available for redevelopment. This confirms that new housing can be delivered within the next five years, as recognised by the conclusion of the District Council's Housing and Economic Land Availability Assessment 2016 (updated October 2018) on the site. It is therefore trusted that the above information is sufficient to wholly allay the objections from third parties during the Preferred Option stage that there was no certainty that the site would become available. By contrast, it is now demonstrably the case that the site will be fully available for redevelopment from the beginning of 2022 onwards. WCC therefore supports the District Council's assessment of the site alongside Policies 33 and 33.9, which allocate the site for 40 Class C3 dwellings. We also support the fact that the total given is specified as being indicative and WCC wish it to remain as such, as WCC consider that there may well be potential for more dwellings at the site. This can be tested appropriately at the planning application stage. The proposed allocation therefore clearly represents a proactive and effective use of brownfield land, held in public ownership, to deliver much needed new homes in the District, as envisaged and supported by Chapter 11 (paragraphs 117-123) of the National Planning Policy Framework (2018). This in turn helps support the delivery of the Government's objective of boosting the supply of homes (paragraph 59) and helps the Council to plan for a mix of housing in the District for different groups (paragraph 61).			
Moore David	LPPS388	Policy 33.16		No		Justified	For the attention of the Government Inspector and WFDC Planning Committee, I strongly make the following bullet points and fully expanded comments for submission against the use of LI/11 and MI/38 for residential development. 1. Unacceptable to use Green Belt before all brownfield sites have been exhausted. 2. Sites LI/11 and MI/38 were added to the plan recently and need to be withdrawn from the plan for the exact same reasons that LI/2, LI/5 and LI/6/7 were withdrawn. 3. There has been failure to publicise the consultation effectively. None of the residents on the perimeter of sites were notified of any impending consultation. 4. Unexploded bomb on site, potential flooding and contamination problems on site as shown in recent	Remove sites LI/11 and MI/38 from Plan	No	

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							surveys. In the first instance, I feel it is unacceptable that Green Belt should be used for residential development before the use of all brownfield sites, i.e. that they have been actually built on. And completely appalling to find out at the eleventh hour that before the final consultation period commenced 1 Nov 18 the Council had removed LI/11 land off the Green Belt register ready for residential development showing clearly that they had already concluded the end result of the consultation before if ever began, not informing the potentially affected rate payers, i.e. the residents that the site was at risk, as it had been recently added to the plan. Safety Issues re the access to sites LI/11 and MI/38 - The Kingsway is a narrow lane without any footpath on either side which is already subject to regular congestion and becomes a "rat run" when there is any sort of hold up (whether major or minor) on the A451 into Stourport. There is already daily substantial traffic to and from Stourport High School, nursery and Sports Club. Any increase in traffic would cause a severe safety hazard to pedestrians, cyclists and anyone using the new proposed country park and would create a situation of an accident waiting to happen and therefore would be madness to contemplate! The majority of the substantial extra traffic created by 315 new dwellings would exit these sites turning left down Kingsway to avoid crossing the main A451 to miss an congestion on entering Stourport and accessing Bewdley and would automatically go through the Burlish traffic lights and B4195 which was the actual reason sites LI/1, LI/5 and LI/6/7 were removed from the original proposed plan because of the congestion caused and to be increased by the waiting/queuing air polluting traffic at the four way traffic light system currently in operation. Local Councillors Autumn Newsletter states LI/11 and MI/38 have been added to the plan as a compromise but all sites mentioned above display without doubt the exact same objections. It is quite obvious sites LI/11 and MI/38 should also be removed from the plan. We have not had the same chance as the residents involved with LI/2, LI/5 and LI/6/7 making us totally disadvantaged from a lack of time perspective and having to use confusing Government forms, which Councillors agreed were difficult to understand, than able to object in letter form as in the first consultation. Unacceptable treatment by Council and Councillors none of which			

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							seemed able to deal with the matter in a professional way. Many giving conflicting information making residents feel that they have been deliberately put in a position of fait accompli giving a variety of poor/lame excuses i.e. notice in the library which many never use, to the point of giving an automated email response saying it would not be available until it was too late i.e. 17th December 2019 from the Head of Planning who we were advised by our local Councillor we could contact for help with this important matter. I would challenge you and have challenged council representatives that if you were put in the exact same position you could not feel anything other than deliberately let down, made to feel disadvantaged so that the council could go ahead without our right to appeal the late inclusion of LI/11 and MI/38 by withholding the relevant information we as rate payers are entitled to which failed to afford us uniform democratic rights and has been unjust and unfair. This is the second time in a short space of time that the Council Planning Department has failed in their duty to notify residents of impending developments on the golf course which was so serious that it generated an apology from Chief Councillor. If the Council feel that part of the old Wyre Forest Golf Course needs to be developed, the only part of the golf course that would benefit from development is the part/site adjacent to the A451 immediately opposite the Stourport Waste Tip, well within the boundaries of Stourport. It is at present due to bad management and poor planning a terrible eyesore but available to be developed.Traffic from that site would be channelled on to the dual carriageway, not a lane, removing the localised congestion to Bewdley Road traffic lights: 1. Making the area safer 2. Removing the current "blot on the landscape" which would then be put to better use providing the houses needed. Aside from all the above mentioned, the land LI/11 is and has been well maintained by local residents giving outdoor pleasure and well being to humans (which supports Government mental health issues) and is a continued habitat for skylarks, badgers, Muntjac deer and a variety of other plants, insects and wildlife, which is now being continued by the rangers and should continue indefinitely for the good of all.			
Campaign to	LPPS383	Policy 33.16	Yes	No	Yes	Justified	We see no objection to the development of the site of the	The size of the site and the target number of	Yes	To amplify as necessary

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Protect Rural England						Effective Consistent with National Policy	school buildings themselves, as they are Previously Developed Land. However, the playing fields belong to one of the use permissible in the Green Belt, as long as it does not affect its openness. Essentially the Playing fields are thus a greenfield use, not a brownfield one. The strategic gap between Kidderminster and Stourport is a narrow one, so that the playing fields are land that is particularly important for the Green Belt purpose of keeping towns apart	dwellings should be drastically reduced, to be similar in scale to that of the former schools buildings.		this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Pre-submission Anonymous	LPPS947	Policy 33.16, Coniston Crescent MI/38					I attended a public meeting on the 4th Dec where plans were being discussed regarding the former Wyre Forest Golf Course and the suggested proposals were discussed with council representatives There has been land set aside which is in the hands of the countryside team but I am writing to strongly object to the land which has been identified in the local plan review as an area for potential development. We view this as a blatant disregard for local residents in an area which already suffers from congestion the Kingsway and Windermere Way are already used by many as a Bypass and if any of your council representatives have carried out a survey this would become very apparent I very much doubt this has been taken into consideration. The Schools are already full and congestion around the Burlish Primary school is a major issue and at times unsafe, getting an appointment at the local doctors is challenging enough but these proposals would make it impossible if houses were built in this area, Perhaps your focus as a council should be to keep these children safe whilst travelling to and from school rather than selling land off to make major profits. The plans for a Nature Reserve are good but this will also add to congestion with plans for a Cafe and Bike repair shop within the reserve. You also have driver speeding issues on the Kingsway which have never been addressed and as you have many children crossing here to access the sporting facilities and high school you have a duty of care to put some			

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							restrictions in place. The site of the old Burlish Park middle school is riddled with asbestos and when it was in flames last year this posed a major threat to the residents nearby and don't see anything being done about this. We strongly object to any Housing development being built on the old Wyre Forest Golf Course site and we look forward to your response.			
Pre-submission Anonymous	LPPS949	Policy 33.16, Coniston Crescent MI/38					I attended a public meeting on the 4th Dec where plans were being discussed regarding the former Wyre Forest Golf Course and the suggested proposals were discussed with council representatives There has been land set aside which is in the hands of the countryside team but I am writing to strongly object to the land which has been identified in the local plan review as an area for potential development. We view this as a blatant disregard for local residents in an area which already suffers from congestion the Kingsway and Windermere Way are already used by many as a Bypass and if any of your council representatives have carried out a survey this would become very apparent I very much doubt this has been taken into consideration. The Schools are already full and congestion around the Burlish Primary school is a major issue and at times unsafe, getting an appointment at the local doctors is challenging enough but these proposals would make it impossible if houses were built in this area. Perhaps your focus as a council should be to keep these children safe whilst travelling to and from school rather than selling land off to make major profits. The plans for a Nature Reserve are good but this will also add to congestion with plans for a Cafe and Bike repair shop within the reserve. You also have driver speeding issues on the Kingsway which have never been addressed and as you have many children crossing here to access the sporting facilities and high school you have a duty of care to put some restrictions in place.			

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							The site of the old Burlish Park middle school is riddled with asbestos and when it was in flames last year this posed a major threat to the residents nearby and don't see anything being done about this. We strongly object to any Housing development being built on the old Wyre Forest Golf Course site and we look forward to your response.			
Pre-submission Anonymous	LPPS942	Policy 33.16					I understand that the highways department have made no objections to this proposal, a development that will devastate the local road system which already can't cope, what do we pay the highway department for? We are unable to access the roads for many hours of the day and these additional houses in one area will make the roads near impossible to use. The Green Belt has now been removed which no one knew about. Stourport-on-Severn is now according to this plan part of Kidderminster, who decided that we were going to have one huge estate which will devastate local services such as schools and doctors?			
Pre-submission Anonymous	LPPS932	Policy 33.8, Land west of former school site, Coniston Crescent. LI/11					Objection to proposals for land behind Windermere way on the former Wyre Forest Golf Course being developed - This has been marked as potential development of housing in the local plan review. I attended a public meeting on the 4th Dec where plans were being discussed regarding the former Wyre Forest Golf Course and the suggested proposals were discussed with council representatives There has been land set aside which is in the hands of the countryside team but I am writing to strongly object to the land which has been identified in the local plan review as an area for potential development. We view this as a blatant disregard for local residents in an area which already suffers from congestion the Kingsway and Windermere Way are already used by many as a Bypass and if any of your council representatives have carried out a survey this would become very apparent I very much doubt this has been taken into consideration. The Schools are already full and congestion around the			

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							Burlish Primary school is a major issue and at times unsafe, getting an appointment at the local doctors is challenging enough but these proposals would make it impossible if houses were built in· this area, Perhaps your focus as a council should be to keep these children safe whilst travelling to and from school rather than selling land off to make major profits. The plans for a Nature Reserve are good but this will also add to congestion with plans for a Cafe and Bike repair shop within the reserve. You also have driver speeding issues on the Kingsway which have never been addressed and as you have many children crossing here to access the sporting facilities and high school you have a duty of care to put some restrictions in place. The site of the old Burlish Park middle school is riddled with asbestos and when it was in flames last year this posed a major threat to the residents nearby and don't see anything being done about this. We strongly object to any Housing development being built on the old Wyre Forest Golf Course site and we look forward to your response.			
Hunt Julia	LPPS187	33.16 MI/38	No	No	No	Justified	Until recently this site was a Local Authority Middle School with an associated playground and playing field. Latterly it was the sixth form site, associated with the High School. The High School transferred to Academy status and a new sixth form building was built on an adjacent site. This site should therefore be returned to the Green Belt area and form part of the playing fields, as was previously planned. There is not sufficient infrastructure to support 100+ dwellings on this site. Windermere Way is already severely congested during the school run and The High School has very few additional school places available. As per the National Planning Policy Framework, only in exceptional circumstances should land be taken out of the Green Belt. Therefore other brownfield sites across the county need to be considered first.		No	
Green Catherine	LPPS1049	Policy 33.16		No		Justified Effective	I do not consider the planning for 2 new housing developments (Map ref: M1/1, M1/38) to be sound for	That housing development should not go ahead, but be given over wholly to the extension of Burlish Top nature reserve.	No	

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							the following reasons: 1. Para 4.2, section 13.6 transport access and sustainable future The proposed building developments were not on early planning development submissions and so this is the first and only opportunity to comment upon them, which is totally unfair as the final date for comments is 17th December 2018. I do not accept that the council has sufficiently considered and justified all the factors that will impact on the existing housing area and traffic chaos created at the start and end of the school day and rush hours, at 2 major road junctions. The council had already recognised that a previous planned development (L1/2) would impact on the traffic chaos, but this newly proposed development does nothing to negate the issue. The existing housing estate, Burlish Park, already suffers from poor parking provision for parents collecting and delivering pupils to two schools, causing chaos as parents jostle for parking spaces on the main route through the estate, Windermere Way and all streets off it. Children from the High School are often seen to wander dangerously through the traffic melee as they try to access the cars at the end of Windermere Way and Kingsway. I can see no way this will be reduced by the new developments, as both are also rat runs, accessing the same major junctions. Whilst this plan states the new houses would be accessed from Kingsway, this may not be the case in future. The extension of the Burlish Top Nature Reserve could exacerbate these issues were the housing development to continue, as it needs a car park which would again lead off Kingsway. Stourport very much needs the Nature Reserve to ensure that Kidderminster and Stourport are clearly defined and not one long conurbation. Its Green Belt status has been removed which is concerning as the council could then decide further building development in the future could be carried out on this land. The estate itself is poorly served by public transport which might have relieved some of the congestion. 2. M1/38 This Site is surplus to educational Needs			

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							The document justifies this development, as the pupils from the original Middle School on the site are now incorporated into the provision by the new Burlish Primary (rebuilt and opened in 2014following Wyre Forest reorganistation in 2007. However the new site runs along side M1/38 means there would be no where for it to extend to accommodate the probable extra pupils. In the Burlish Primary Ofsted Report of July 2018, the schools numbers were listed as 471, but with an authority allocation of 420. How could that school accommodate further pupils in its immediate catchment area. The very building of more houses on this land would mean no room for it to expand in future years. This policy states that by selling land M1/38 (30.33) after being permitted to build on existing playing fields to create a new Sixth Form Centre, The Stourport High School exceeds the playing pitch requirement already, but is to have an extra 30 pupil intake foe the next 5 years. It has agreement to use the Stourport Sports Centre facilities to make up this discrepancy. However this statement does not take into account that the school has to pay to a high sum do this and that in the current economic climate, that in itself may not be sustainable.			
Betts Maisie Beatrice	LPPS1051	Policy 33.16		No		Justified Effective	I do not consider the planning for 2 new housing developments (Map ref: M1/1, M1/38) to be sound for the following reasons: 1. Para 4.2, section 13.6 transport access and sustainable future The proposed building developments were not on early planning development submissions and so this is the first and only opportunity to comment upon them, which is totally unfair as the final and only date for comments is 17th December 2018. I do not accept that the council has sufficiently considered and justified all the factors that will impact on the existing housing area and traffic chaos created at the start and end of the school day and rush hours, at 2 major road junctions. The council had already recognised that a previous planned development (L1/2) would impact on the traffic chaos, but this newly proposed development does nothing to negate the issue. The existing housing estate, Burlish Park, already suffers from poor parking provision for parents collecting and	That the housing development should not go ahead, but be given over to the much needed nature reserve as a Green Belt buffer against the merging of Stourport and Kidderminster towns which is totally unacceptable.	No	

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							delivering pupils to two schools, causing chaos as parents jostle for parking spaces on the main route through the estate, Windermere Way and all streets off it. Children from the High School are often seen to wander dangerously through the traffic melee as they try to access the cars at the end of Windermere Way and Kingsway. I can see no way this will be reduced by the new developments, as both are also rat runs, accessing the same major junctions. Whilst this plan states the new houses would be accessed from Kingsway, this may not be the case in future. The extension of the Burlish Top Nature Reserve could exacerbate these issues were the housing development to continue, as it needs a car park which would again lead off Kingsway. Stourport very much needs the Nature Reserve to ensure that Kidderminster and Stourport are clearly defined and not one long conurbation. Its Green Belt status has been removed which is concerning as the council could then decide further building development in the future could be carried out on this land. The estate itself is poorly served by public transport which might have relieved some of the congestion. 2. M1/38 This Site is surplus to educational Needs. The document justifies this development, as the pupils from the original Middle School on the site are now incorporated into the provision by the new Burlish Primary (rebuilt and opened in 2014 following Wyre Forest reorganistation in 2007. However the new site runs along side M1/38 means there would be no where for it to extend to accommodate the probable extra pupils. In the Burlish Primary Ofsted Report of July 2018, the schools numbers were listed as 471, but with an authority allocation of 420. How could that school accommodate further pupils in its immediate catchment area. The very building of more houses on this land would mean no room for it to expand in future years. This policy states that by selling land M1/38 (30.33) after being permitted to build on existing playing fields to create a new Sixth Form Centre, The Stourport High School exceeds the playing pitch requirement already, but is to have an extra 30 pupil intake for the next 5 years. It has agreement to use the Stourport Sports Centre facilities to make up this discrepancy. However this			

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							statement does not take into account that the school has to pay to a high sum do this and that in the current economic climate, that in itself may not be sustainable.			
The Stourport High School & Sixth Form Centre	LPPS685	Policy 33.16	Yes	No	Yes	Effective	Fully support allocation on policy 33.16 school site Coniston Crescent, but there is a need for a joint approach with site in policy 33.8 LI/11 to develop a comprehensive design approach.	We consider it necessary for the Local Plan to more clearly set out that our site (33.16) and the adjoining site (33.8 LI/11) are to be developed independently	Yes	The delivery of the site is a key strategic matter for the school and we therefore consider it necessary to participate at the oral part of the examination in order to explain that the school intend to bring forward the site for development and the implications that would arise if the site if the site was not allocated for development.
Landowner Lickhill, Stourport	LPPS755	Policy 33.16, Site MI/38	Yes	No	Yes	Justified	Believes the site is not justifiable as the pre submission document does not discuss improvements to the Kingsway junction on the A451, the land is within the Green Belt and do local schools have capacity to accommodate additional places?	In previous Stourport Greenfield document in Local Plan Selection Paper it was considered possible to deliver infrastructure improvements at Burlish Crossroads. Therefore Junction improvements should be facilitated to improve access between Stourport, Bewdley and Kidder-minster to ease congestion. With all the proposed building in the area would it not be sensible to re-establish this school as an extension of the existing Primary School which lies adjacent to the site.	No	
Pre-submission Anonymous	LPPS946	Policy 33.16					The plan to have access to this area from Kingsway is likely to be a dangerous decision as this road is narrow with a blind bend. It is already used by drivers that do not respect either the speed limit or the fact that pedestrians and horses on the road. At present cars are parked by the allotments and unless a parking facility is planned for these allotments, this will be an added danger to both vehicles and pedestrians. The additional traffic will also cause problems for persons using the Sports Centre. Is there a plan to put a controlled pedestrian crossing to enable people to cross safely?			

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							Is a pavement planned for the length of Kingsway for pedestrians? There is no mention in the plan for additional school places or a Doctors surgery. Our schools and Doctors are already oversubscribed. I also think the ground between Stourport and Kidderminster is in danger of being used to join Stourport and Kidderminster together. I have made my comments in good faith and hope they will be taken into consideration.			
Pre-submission Anonymous	LPPS313	Policy 33.29, School Site Coniston Crescent MI/38		No			I wish to raise a grievance, at the very idea, you would even consider potential development, up the Burlish area, on the old Wyre Forest golf course, between the school and housing estate.. There is not much Green Belt land around the area in which people can walk and enjoy the country side. Surely you would like to maintain a little bit of Green Belt area that we have! This is one of the attractive points of Stourport that brings people in, why on earth would you want to build on it? We might as well live in a city!! As a parent of three, I understand that we need more housing, but destroying perfect Green Belt land, what future are we actually leaving our children? Please take this as a strong objection, against any motion of building on this land. I wish to be kept informed, of any plans for the project to proceed.		No	
Jones Rachael	LPPS399	Policy 33.8	No	No	No	Justified Effective	We have not been consulted properly as there has been a lack of publicity to this. The way in which the land has been removed from "Green Belt" status seems to have been done in a very underhand way - no notification has been given to residents. We have a lot of wildlife which will be affected by such a change in usage including bats which will be affected by light pollution should lighting be erected on Green Belt land. The land is a natural soak away and provides perfect habitat for newts, slow worms and grass snakes and woodpeckers as well as badgers, hedgehogs, foxes, etc. If lost would create flood. We were told that the condition of the building the extension to the high school, the old Sixth Form Block would be returned to Green Belt - this has not happened. (Lack of planning maintained). Lives could be put at risk due to	No street lighting, all hedgerow to be kept in place to protect wildlife and all trees to the site to be kept in place, many of which have protected status anyway. Access to the allotments to be kept open at all times via Coniston Crescent. this is an agreement made when the allotments were moved from the site in Windermere Way to the new existing site. This right of way has been kept in operation ever since on a daily basis. NB we do not want an alley as one this size would not be adequately maintained or safe. Infrastructure needs to be put in place i.e. village hall, doctors, shops, etc. It is destroying traditional field patterns and threatens a public right of way.		

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							the increase in traffic in an already congested part of town. There would be a loss of open space for children in the area to play. During school times the roads around these areas are a car park as such lives could become at risk it there is an increase in traffic and lack of car parking and road safety.			
Jones Barbara	LPPS49	M1/38	Yes	No	No	Positively Prepared	Loss of playing field area adjacent to the new Burlish First School. This school does not appear to have sufficient room for football, rugby or cricket pitches. Surely as the school caters up to age 11 years this facility should be available. With additional housing being proposed, the school will most like need to be enlarged and therefore need more sports facilities.		No	
Sport England	LPPS284	33.30		No		Positively Prepared Consistent with National Policy	The allocation of site MI/38 for residential development is contrary to the evidence in the PPS which recommends and enhancing the playing field and to secure its use for the wider community to address identified needs for playing pitches. Sport England considers that the playing field is not surplus to requirements to meet paragraphs 97a and 97b of the NPPF.	Amend Table 33.0. 1 in policy 33 to remove allocations and MI38, or to amend the wording of policy 33.16 to require equivalent or better provision of sports facilities in quantity and quality in a suitable location in accordance with paragraph 97b) of the NPPF.	No	
Environment Agency	LPPS979	Policy 33.17, Firs View Yard, Wilden Lane, MI/36		No			We would support this statement, the number of pitches should be restricted and no new Caravans classified as High vulnerable are to be permitted in the floodplain.			
Campaign to Protect Rural England	LPPS384	Policy 33.18	No	No	Yes	Justified Effective	Even though a Stourport Relief Road is no longer in the LTP4, this is a necessary scheme and cannot easily be provided elsewhere. Accordingly, the line of the proposed road should continue to be safeguarded, in the hope that it can eventually be delivered. If it is not safeguarded, it will never be possible for it to be delivered. LTP4 suffered from a severe lack of ambition for the improvement of the county's road network, no doubt imposed by austerity since the credit crunch	Delete this site, so far as it would prevent the creation of a Stourport Relief Road, development proposal 33.18 should be deleted and a policy added safeguarding the proposed line of the road.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Campaign to Protect Rural England	LPPS387	Policy 33.19	No	No	Yes	Justified Effective	Condition 3: Where buildings are located near Badgers' setts, it is necessary not only to protect the badgers from the people, but the people and buildings from the actions of badgers. Newspaper reports in Dudley have recorded the distress of residents whose houses and gardens have been adversely affected by badgers extending their set into the garden and under buildings.	Stronger wording is needed as to new barriers to separate people from badgers.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument
Warren Carol	LPPS278	33.14		No		Justified	1. The Local Plan is inconsistent setting out different numbers of housing on 3 development sites across	Reduce number of homes to be built on these sites.	No	

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							Stourport Page 239 give one set of figures which the infrastructure delivery plan accompanying it give another. This brings into question adequacy of the modelling of the traffic impact across the town. 2. High cost of upgrading The Kingsway to meet the levels of traffic generated would reduce capacity to provide much needed affordable housing as developers look to maximise income.	Ensure Kingsway is improved including at its junction with A451 Provide pavements to that pupils can safely access High School		
Scott Stuart	LPPS288	33.6	No	No		Positively Prepared Justified Effective	This part of the Local Plan is unsound for the following reasons: Referring to Government guidance to LGA's on consulting Residents and the fact that it was not included in the 2017 Plan, insufficient time has been allowed for those affected to respond. Additionally, the consultation form refers to the Duty to cooperate which principle was rescinded in September 2018 causing respondents to waste time researching it. Principle Five of the Urban and Waterfront Concept Plan states that developments must Achieve net-gain for Green Infrastructure across the Strategic Development Corridor in which respect the Plan fails as the inadequate compensation measures stated would indisputably result in a net loss in Green Infrastructure. The inordinate cost, which I estimate to be in the order of 3 to 5 million pounds, and work involved in stabilising the at least 1/4 million tons of fly ash which comprises the site, accessed through a cul-de-sac only 15ft wide would cause intolerable disruption, pollution and physical risk to residents adjoining and in the vicinity of the site thereby denying them the Right to Family Life. Further, in accordance the WFDC Contaminated Land Strategy, a full pollution assessment must be conducted on the highly friable ground and published before it can be considered for any re-designation. A statement in the justification is factually wrong as there has never been any mineral extraction from the site. In normal use, the site access will be insufficient for the proposed number of dwellings due to the pinch point at Yew Tree Walk - the other cul de sacs, which are all that width, support between 12 and 20 houses only - the result will be intolerable noise nuisance on a permanent basis to the adjacent residents from the resulting vehicular movements. Above and beyond that will be the impact of this extra traffic onto Stagborough Way to all the residents on the estate. For the proposed		No	

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							number of houses there must be a mandatory second emergency access point to the site for which there is no feasible location. It is not effective because it merely swaps two other sites from the 2017 Plan, M1/17 and L1.5 both of which are on stable ground, with this highly problematical site resulting in a net loss of housing numbers to the overall plan and exceptionally high cost to all aspects of the local environment.			
Marshall Terence & Mavis	LPPS287	33.6		No		Justified	The only thing we can say to modify the plan is DO NOT START IT. Traffic congestion is bad enough on the estate already.	The only thing we can say to modify the plan is DO NOT START IT. Traffic congestion is bad enough on the estate already.	No	
Minor Laura	LPPS291	33.6		No		Justified	The traffic in and around the proposed site will have a negative impact on the surrounding area. The construction of the new dwellings will mean a large increase in the number of vehicles travelling backwards and forwards on Lickhill estate. Roads are already congested during school pick up and drop off and the addition of more vehicles will make matter even worse. The proposed entrance to the new dwellings will cause significant disruption to the residents of nearby houses. There will be significant loss and destruction of habitat to wildlife within the proposed construction area.		No	
Bradley Paddocks	LPPS46	Pearl Lane AKR/14	No	No	No		AKR/14 Pearl Lane HELAA 2016 REPORT description Site consists of 2 large agricultural fields bounded by roads to the north and east with housing estate along the eastern edge. Public footpath crosses site. Site is adjacent to major crossroads at edge of built-up area. NOT IN GREEN BELT BUT IT IS GREENFIELD Quote from 2017 Preferred options report The other sites proposed under this option are not in the Green Belt and are situated west of the River Severn beyond Areley Kings. Development here would encroach into open countryside and there are concerns that the extra traffic generated would push pollution levels higher	Notes on why LI/7 Bradley Paddocks would be a viable alternative site. Extract from Wyre Forest District Council Green Belt Review May 2018 (describing the site) Adjacent to Lickhill Road North, the site is in grazing use. The land begins to fall away to the River Severn to the west and whilst visually enclosed by a substantial hedgerow to the north, has an open aspect to the west, with extensive views across to the dense woodland to the west of the River Severn. There is no public access and prior to site investigation, there are no recorded nature conservation or cultural heritage interests on the site. CONTRIBUTION The site makes a contribution to	Yes	I would like to have the opportunity to an answer questions as to why Bradley Paddocks LI/7 should be considered as an alternative site to AKR/14 Pearl Lane.

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							and lead to a new Air Quality Management Area being declared in the centre of the town. The site at Pearl Lane also has known drainage issues. It is for the sites' promoters to justify their allocation and demonstrate how these constraints can be mitigated. AIR POLUTION is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas. (footnote 1) (footnote 2) One of the most deprived wards in the Wyre Forest (Areley Kings and Riverside, Stourport -on-Severn) will be some of the most affected 2017. (Wyre Forest Health and Wellbeing Profile) The daily walk across the bridge for children living in this ward could have severe health consequences for many years to come and cost the NHS Millions in associated costs. • The annual health cost to society of the impacts of particulate matter alone in the UK is estimated to be around £16 billion. (footnote 3) • We have 2 Air Quality Management areas in the Wyre Forest. (Air quality Management area means it exceeds safe levels of pollution and so needs to be under strict monitoring and an action plan needs to be in place to bring it down to a safe level, long term) • Welch Gate, Bewdley • Horsefair, Kidderminster and one Marginal: Bridge St, High St and York Street. Stourport. • So, what's the problem in Stourport…. The Bridge across the River Seven. • The Traffic morning and evening. So why are we planning to put 250 houses at Pearl Lane? This is in addition to the 62 that Malvern have already received	the Green Belt in this location by virtue of being part of wider undeveloped land which separates Bewdley and Stourport, EXTRACT FROM THE 2017 PREFERRED OPTIONS DOCUMENT Development includes the Bournewood Nursery site and the adjoining paddocks. These sites are well-screened by extensive tree planting and strong hedgerows although impact on views from across the River Severn will need to be carefully considered. • It is agreed that Bradley Paddocks does make a contribution to the Green Belt, but it is not going to be the tipping point that makes Stourport-on-Severn an Air Quality Management Area. ECOLOGICAL SURVEY COMPLETED 9/04/18 by HEC (full report sent to WFDC 28/11/18) available on request. Findings for LI/7 MAIN FINDINGS: • Land is generally of low ecological value & much of the site is ecological poor. • The external boundaries provide the most interest and valuable habitat. • Potential for bat flight corridor is concentrated along the margins. • Badger activity is present on the boundary. • Potential bird nesting within and around the boundaries. • Potential reptile habitat external of site. Conclusions • The site is dominated by short grazed horse paddock and its affect upon the local species population is minimal. • Timing of work is to be programmed to reduce disturbance to wildlife i.e. dust, noise, lighting and silt. • Further badger survey required to establish presence/absence and		

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							permission for. So that is If you take the recognised average of 1.5 cars per house, 462 extra cars morning and evening coming across the Bridge. • Yes, Pearl Lane is not Green Belt, but it is Green field. • So, our Councillors have created a plan for housing that will damage air quality in Stourport. Stourport's heritage conservation area: The Canal basin and the popular riverside areas will be badly affected. • Nobody wants extra houses built in their 'backyard', but we should not wreck the whole town, there is no going back. • Creating a 3rd Air Quality Management area should be avoided at all costs. • Building additional housing capacity Areley Kings side of bridge is a poor decision without a second road bridge. • Building on the less substantial parts of the Green Belt will be a better option, rather than wrecking the air quality for the WHOLE TOWN. *Footnotes:* 1. *Environmental equity, air quality, socioeconomic status and respiratory health, 2010* 2. *Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006* 3. *Defra. Abatement cost guidance for valuing changes in air quality, May 2013*	population size. • Very little negative public opinion. • Development here would not encroach into open countryside and there are no concerns that the extra traffic generated would push pollution levels higher and lead to a new Air Quality Management Area being declared as it is with the Pearl Lane development. (AKR/14) • Although the site was Not included in the Plan because of Highway constraints at Burlish Crossing, most of the traffic congestion is from Bewdley /Stourport along Bewdley Road. There is less congestion at the crossing from Lickhill Road end. The sites that could add to Burlish crossing congestion were all discounted on mass. The Crossing does have some additional capacity. OTHER POSITIVE CONSIDERSATIONS REGARDING THE SITE • Walkable distance to Burlish top and adjoining nature reserve on the Golf course 12 minutes. • Walkable distance to Stourport High School 30 Minutes. • Walkable distance to Memorial Park 15 minutes. • Walkable distance to Stourport-on-Severn Town centre 30 minutes. • This means the site is very desirable, sustainable and environmentally friendly. • Primary Schools at both Memorial Park and Burlish are also walkable see above times. • Well serviced by local buses. • The Site is deliverable without decontamination or piling issues. The substitution of this site along with the adjoining Bourne Wood site will make some of		

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								the shortfall left by the withdrawal of AKR/14 Pearl Lane. The Combined site is 49 Bradley Paddocks LI/7 plus 45 Bourne Wood LI/6 Total = 94: Both sites are low density with Green spaces.		
Wallace Angela	LPPS39	33.6 AKR/18		No		Justified	Should the development of 85 houses be granted the increase in traffic on the estate roads and surrounding Lickhill and Burlish would potentially be increased by up to 180 cars. The road junction at Burlish via traffic lights is already the cause of major congestion in the area. The estate has many small children plus there are two schools on Stagborough Way which already proves chaotic at the start and end of the school day. The land for the proposal itself is a haven to wildlife which should be offered protection not destroying. There are many brownfield sites available for development. Has consideration been given to the stream and sewer that run beneath the proposed site. The soil make up of this land should also be considered.	The local authority need to show what the benefits to the ecology and environment will bring. They also need to demonstrate that the existing infrastructure from an education and travel perspective can absorb the additional loads without creating any increase in health and safety to the local population and environment.	No	
Powell Philip	LPPS32	33.10	No	No	No	Justified Effective Consistent with National Policy	The access to the proposed site is very narrow and if homeowners want to park outside their own homes this will make it virtually impossible for the 85 residents of the new site to be able to get in and out. There is an abundance of wildlife in the are the act of construction will drive the wildlife away because of the noise and pollution, the piling to form the foundations will cause vibrations which would cause the banks to become unstable potentially. I am a local resident and the first I have known about this development is on a social media page not from any other formal method!	There are plenty of safer and brown fields sites on old industrial areas around Stourport Tesco's, Cheapsisde etc that would have less of an impact	Yes	Because I'm concerned as a resident vey close to the proposed area has not been properly informed or consulted about the removal of the Green Belt status
Warren Geoffrey	LPPS279	33.10		No		Consistent with National Policy	As a resident of Stagborough Way, Stourport I am concerned about the proposal to re classify Yew Tree Walk as suitable for housing development contrary to the 1987 decision to retain it as a Green Belt. The importance of this site for the local environment has been widely recognised in terms of wildlife of various kinds. My concerns also extend to traffic flow consequences for the whole of Stourport. The vey limited space for access to this site to be improved will affect the adjacent estates. The suggestion that there are clearly identified no solutions is particularly worrying. Safe and sufficient of roads is vital given the proximity of the 2 primary schools.	Specific proposals on traffic management, preservation of valuable wildlife and Green Belt are needed and should be credible.	No	
Bayliss Jane	LPPS201	33 10	Yes	No	No	Positively Prepared	Too much traffic with two schools , and the loss of Green Belt land and wildlife.			

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Wallace Ian	LPPS38	33.6 AKR/18		No		Justified	Based on a development of up to 85 houses that would increase the traffic on the estate access roads and surrounding Lickhill & Burlish by up to 180 cars. Access via Burlish traffic lights is already the cause of major congestion in the area. The estate access has many small children and this increased traffic will cause major safety concerns. The land of the proposal itself is a haven to wildlife which we should be protecting not destroying. Why are we developing Green Belt when there are already many brownfield sites available for development. Has consideration been given to the stream and sewer that run beneath the proposed site? Let alone the soil make up.	The local authority need to show what benefits to the ecology and environment this development will bring. They also need to demonstrate that the existing infrastructure both from an education and travel perspective can absorb the additional loads without creating any increase in health and safety to the local population and environment	No	
Bradley Paddocks	LPPS41	Land at Yew Tree Walk AKR/18	No	No	No		AKR/18 Yew Tree Walk HELAA 2016 REPORT DESCRIPTION This scrubland site lies to the south of a housing estate and was previously used to store arisings from the old power station. It is therefore deemed to be previously developed land. The entire site is in the Green Belt. The Moorhall Marsh LNR abuts the eastern end of the site. A TPO (2013) covers 18% of the site – 2 areas of mixed woodland at western and eastern ends. 25% of the site is in flood zone 3. Together, these constraints limit the developable area. Access along Moorhall Lane to the south is impossible in times of flood and all access would need to be through the adjacent housing estate which may potentially limit site capacity. WYRE FOREST DISTRICT COUNCIL GREEN BELT REVIEW MAY 2018 Green Belt Contribution extract from the Green Belt review document. The site contributes to containing the built edge of Stourport in this location and maintaining open countryside between the River Severn and Stourport. 1. No suitable Access to the site, very narrow access via Yew tree Walk. The Road is 4.67 Metres wide and 37 metres long. 2. Tree Preservation Order 2013 (TPO) Covers 18% of the site. This limits the size of the development. 3. 25% of the site is in the flood plain Zone 3. Access only via the narrow Yew Tree Walk.	Notes on why LI/7 Bradley Paddocks would be a viable alternative site. Extract from Wyre Forest District Council Green Belt Review May 2018 (describing the site) Adjacent to Lickhill Road North, the site is in grazing use. The land begins to fall away to the River Severn to the west and whilst visually enclosed by a substantial hedgerow to the north, has an open aspect to the west, with extensive views across to the dense woodland to the west of the River Severn. There is no public access and prior to site investigation, there are no recorded nature conservation or cultural heritage interests on the site. CONTRIBUTION The site makes a contribution to the Green Belt in this location by virtue of being part of wider undeveloped land which separates Bewdley and Stourport, EXTRACT FROM THE 2017 PREFERRED OPTIONS DOCUMENT Development includes the Bournewood Nursery site and the adjoining paddocks. These sites are well-screened by extensive tree planting and strong hedgerows although impact on views from across the River Severn will need to be carefully considered. ECOLOGICAL SURVEY COMPLETED 9/04/18 by	Yes	So that I can answer questions regarding the deliverability of Bradley Paddocks as an alternative site for Yew Tree Walk.

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							4. The ash waste, it is unknown what is contained and how much it will cost to remove, the site requires piling these factors could make the site economically unviable and mean the houses are not deliverable for the local plan. 5. No proper consultation it was not in the original plan. 6. Wildlife: home to badgers, foxes, rare reptiles and many birds and butterflies, 300 species of moths and butterflies. 7. Two schools close by extreme traffic congestion. 8. 85 homes mean 127 extra cars (1.5 Average per house) This traffic will all go through Stourport on commute out of the area or to drop off at Stourport High School. More importantly will be a real danger to the local school with roads already at over capacity level. 9. There is strong local opinion against this development.	HEC (full report sent to WFDC 28/11/18) available on request. Findings for LI/7 MAIN FINDINGS: • Land is generally of low ecological value & much of the site is ecological poor. • The external boundaries provide the most interest and valuable habitat. • Potential for bat flight corridor is concentrated along the margins. • Badger activity is present on the boundary. • Potential bird nesting within and around the boundaries. • Potential reptile habitat external of site. Conclusions: • The site is dominated by short grazed horse paddock and its affect upon the local species population is minimal. • Timing of work is to be programmed to reduce disturbance to wildlife i.e. dust, noise, lighting and silt. • Further badger survey required to establish presence/absence and population size. So, you have none of the problems with extensive wildlife associated with Yew Tree Walk site. The site does not have poor access via a congested housing estate that is causing a road safety risk. Very little negative public opinion. Not included in the Plan because of Highway constraints at Burlish Crossing, most of the traffic congestion is from Bewdley /Stourport along Bewdley Road. There is less congestion at the crossing from Lickhill Road end. The sites that could add to Burlish crossing		

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								congestion were all discounted on mass. The Crossing does have some additional capacity. OTHER POSITIVE CONSIDERSATIONS REGARDING THE SITE • Walkable distance to Burlish top and adjoining nature reserve on the Golf course 12 minutes. • Walkable distance to Stourport High School 30 Minutes. • Walkable distance to Memorial Park 15 minutes. • Walkable distance to Stourport-on-Severn Town centre 30 minutes. • This means the site is very desirable, sustainable and environmentally friendly. • Primary Schools at both Memorial Park and Burlish are also walkable see above times. • Well serviced by local buses. • The Site is deliverable without decontamination or piling issues. • The substitution of this site along with the adjoining Bourne Wood site will make up the shortfall left by the withdrawal of Yew Tree walk (85) The Combined site is 49 Bradley Paddocks LI/7 plus 45 Bourne Wood LI/6 Total = 94: Both sites are low density with Green spaces		
Friends of Patrick's Field (Nash)	LPPS52	Policy 33.6 AKR/18	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	We were surprised to see that this land had been included in the Wyre Forest District local plan 2016-2036 as at the initial consultation meeting we were assured that this pocket of land had previously been added to the Green Belt to ensure that the Severn Valley corridor would not be adversely affected. Removing this land from the Green Belt now could be seen as the thin end of the wedge leading to further development of the Severn Valley corridor between Stourport and Bewdley. Since the lease reverted to the Estate of Patrick deceased	How is this statement valid? "NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination", surely to be legally compliant the Duty to co-operate must be assessed as I maintain that there was insufficient time to fully assess the additions to the plan and obtain the detailed resposnes that requires. By dropping the requirement for this land to be removed from the Green Belt, that would help	No	

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							following the closure of the CEGB social club when the power station closed down the site has re-wilded with many trees self-seeding and growing to such an extent that they now have preservation orders on them, the plateau has also largely returned to natural scrubland providing a excellent cover and breeding sites for a large population of diverse natural flora and fauna which further enhances this part of the Severn Valley corridor. The above issues are in addition to the previously raised issues from the planning application for building on this land in 1987 which are not fully addressed in this local plan. What does not appear to have been addressed is the inevitable increase in traffic on an already busy residential estate with two schools. Traffic on the Lickhill Estate is already a major concern for all. The Councils figures which I believe are derived from Worcester County Planners is based on the movement of traffic through the estate at rush hour times. No mention is made of the much more serious traffic problems encountered around the 2 schools when offspring are dropped off and collected. Additional housing will only exacerbate these issues. Also Yew Tree Walk is narrow and as the only access point to the proposed development could easily be blocked to emergency vehicles by the parking of a large vehicle or van. This development would also cause more traffic congestion at rush hour times to the Burlish Crossing crossroads, where it is not uncommon to queue for in excess of 20 minutes to get from the bottom of the Bewdley bypass to these traffic lights.	protect the Severn Valley Corridor. Developing this area for social and leisure use, controlled to maintan the bio-diversity would be a net gain and could be used to offset a net loss to biodiversity in other areas which are not so ecologically sensitive.		
Redfern Ian	LPPS69	Policy 33.6 AKR/18	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	To be legally compliant the Local Plan has to be prepared in accordance with the Duty to Co-operate and legal and procedural requirements, including the 2011 Localism Act and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended). We are dismayed that following the decision to add this as potential housing land we were not advised that this was due to happen and we only found out about this when we went to view this iteration of the local plan. We have less than 6 weeks in which to read and absorb hundreds of pages of very technical information. These are from a host of organisations and as lay people trying to obtain the knowledge to submit legal arguments as to the veracity of the plan and as to whether the arguments for the use of a	The consultation period needs to be extended so that all parties can fully investigate the plan and research any arguments that they may wish to put forward. Given the 6 weeks that we have to respond does not allow for full disclosure by the Wyre Forest District Council to any requests for information, which must invalidate the "Duty to co-operate",	Yes	

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							particular parcel of land for building are sound. With the limited time we had available we have created a series of documents that outline our concerns about the soundness of this planned development, particularly to whether the removal from the Green Belt can be justified. If building were permitted whether it would be justified and if this is consistent with National Policy.			
Powell-Barnett Claire	LPPS199	33.11 AKR18	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	As mentioned in previous comment the Local Plan is incorrect in stating the land was previously used for sand and gravel extract or a quarry. Local historical maps can validate this and show the quarry being 3 fields away. In the plan the contribution to Green Belt is said to be significant in 4/5 points and making a contribution to the fifth. To say differently as a way to validate its development is contradicting and misleading to those unfamiliar with the site.	Adjust the plan to reflect the true nature of the site. I believe it to be incorrectly classed as Brownfield.	Yes	I am a resident and care about the development.
Cooper Kerry	LPPS18	LI/11	No	No	No		This land was Green Belt land which the council have changed so that it can be built on. Green Belt needs to be protected as it is of importance to people and wildlife. 200 new houses on this site will be a strain on the local infrastructure. Stourport only has 1 high school which has had to increase its admissions this year to accommodate the current amount of children in the area. We have very busy roads at rush hour, if you take into consideration that each of the 200 houses could each have 2 working adults who drive to work each day that is 400 more cars. People need green areas for their health and wellbeing. Our green spaces seem to be getting smaller is there any wonder that there is an obesity problem. Stourport needs to keep its unique identity as being a small town and having that space between Kidderminster helps to separate the towns.	Keep the land as Green Belt. If necessary to build then build a much smaller amount of high end housing that have good sized gardens.	No	
Bradley Paddocks	LPPS44	Land west of former school site Coniston Crescent LI/11	No	No	No		LI/11 & M1/38 Coniston Crescent HELAA 2018 REPORT description Former golf course (closed December 2016) adjacent to housing estate on northern edge of Stourport-on-Severn. WFDC OFFICER VIEWS from HELAA REPORT Currently undeveloped site so any development will have major impact. Development would however round off the urban edge at this location.	Notes on why LI/7 Bradley Paddocks would be a viable alternative site. Extract from Wyre Forest District Council Green Belt Review May 2018 (describing the site) Adjacent to Lickhill Road North, the site is in grazing use. The land begins to fall away to the River Severn to the west and whilst visually enclosed by a substantial hedgerow to the north, has an open aspect to the west, with extensive views across to the dense woodland to the west of the River Severn. There is no public	Yes	I would like to have the opportunity to an answer questions as to why Bradley Paddocks LI/7 should be considered as an alternative site to LI/11 & M1/38 Coniston Crescent.

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							Vehicle Access Poor. Development would require new access onto Kingsway and junction improvements to A451. MI/38 HELAA 2018 REPORT description Former school and playing field accessed from residential road with allotments to north and former golf course land to west. WYRE FOREST GREEN BELT REPORT MAY 2018 There are a number of sites where the impacts are judged to be significant and damaging to the Green Belt, through their likely effect on openness. These sites are as follows and may require more specific attention in consideration of their impacts: This site gets a special mention LI/11 Former golf course off Windermere Way. The Green Belt report gives a SIGNIFICANT CONTRIBUTION for MI/38 The site is part of the remaining open land between Stourport and Kidderminster, the erosion of which would further narrow the already limited gap between the two settlements. Development would have to be considered in the context of proposals on an adjacent site – land off Windermere Way. Although part of a former school, the land retains an open aspect and visual relationship with the former golf course to the northwest and allotments to the northeast. Development would impinge upon the openness of the land and would, on its own, be an incongruous extension of the built edge of Bewdley. The GREEN BELT REPORT gives a SIGNIFICANT CONTRIBUTION for L1/11 The site is part of the remaining open land between Stourport and Kidderminster, the erosion of which would further narrow the already limited gap between the two settlements. Development would have to be considered in	access and prior to site investigation, there are no recorded nature conservation or cultural heritage interests on the site. CONTRIBUTION The site makes a contribution to the Green Belt in this location by virtue of being part of wider undeveloped land which separates Bewdley and Stourport, I EXTRACT FROM THE 2017 PREFERRED OPTIONS DOCUMENT Development includes the Bournewood Nursery site and the adjoining paddocks. These sites are well-screened by extensive tree planting and strong hedgerows although impact on views from across the River Severn will need to be carefully considered. It is agreed that Bradley Paddocks does make a contribution to the Green Belt but it was not given the SIGNIFICANT heading (see Green Belt report May 2018) that was attributed to both LI/11 & M1/38 Coniston Crescent and so is a better alternative with reference to the above report. ECOLOGICAL SURVEY COMPLETED 9/04/18 by HEC (full report sent to WFDC 28/11/18) available on request. Findings for LI/7 MAIN FINDINGS: • Land is generally of low ecological value & much of the site is ecological poor. • The external boundaries provide the most interest and valuable habitat. • Potential for bat flight corridor is concentrated along the margins. • Badger activity is present on the boundary. • Potential bird nesting within and around the boundaries. • Potential reptile habitat external of site.		

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							the context of proposals on an adjacent site – land off Coniston Crescent. The site and its wider context is characterised by a high degree of visual exposure which would be compromised by development, particularly in respect of the unbounded north eastern edge. Here, despite 'rounding-off' of the built edge, development would represent an extension into local countryside. The site allocations have to be based on evidence. All of the sites have been assessed against the same planning criteria to assess the suitability of each of them for development, focussing on the three elements of sustainability (environmental, social and economic) and incorporate consideration of other technical evidence generated in the preparation of the Local Plan • SIGNIFICANT GREEN BELT CONTRIBUTION has clearly been ignored why did Wyre Forest pay for a report then ignore significant findings? • The land it now adjoins is the new Burlish Top nature reserve. The development will be clearly visible from the vantage point on the hill where it has been mooted to place the mobile café seating area to take in those fabulous views. • The car hard standing area for visitors to the nature reserve will be located 200m up the road, parking will not be extensive, but I was told the road has a number of spaces and no parking restrictions. So, we could see Kingsway requiring a complete makeover in an area that is an area of natural beauty. • The Green Belt plan is right this area has a SIGNIFICANT PART to play in the Green Belt. • An extra 315 homes mean 472 extra cars (1.5 Average per house) All using the Kingsway. The Kingsway is a narrow road with a poor junction near the busy Stourport High School. • The School buses use this junction as pickup point. I know it has been acknowledged in the report that the junction (Kingsway/A451) requires improvement but widening a road through a newly designated nature reserve is a bad idea. Slowing traffic/reducing traffic is much more sensible.	Conclusions: • The site is dominated by short grazed horse paddock and its affect upon the local species population is minimal. • Timing of work is to be programmed to reduce disturbance to wildlife i.e. dust, noise, lighting and silt. • Further badger survey required to establish presence/absence and population size. • Very little negative public opinion. • The site is not situated next to a designated nature reserve. But does benefit in that the site is 12 minute's walk away and so therefore can be used for recreational purposes. • The site does not have poor access via the congested A451Junction. Although the site was Not included in the Plan because of Highway constraints at Burlish Crossing, most of the traffic congestion is from Bewdley /Stourport along Bewdley Road. There is less congestion at the crossing from Lickhill Road end. The sites that could add to Burlish crossing congestion were all discounted on mass. The Crossing does have some additional capacity. OTHER POSITIVE CONSIDERSATIONS REGARDING THE SITE • Walkable distance to Burlish top and adjoining nature reserve on the Golf course 12 minutes. • Walkable distance to Stourport High School 30 Minutes. • Walkable distance to Memorial Park 15 minutes. • Walkable distance to Stourport-on-Severn Town centre 30 minutes. • This means the site is very desirable, sustainable and environmentally		

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								friendly. • Primary Schools at both Memorial Park and Burlish are also walkable see above times. • Well serviced by local buses. • The Site is deliverable without decontamination or piling issues. The substitution of this site along with the adjoining Bourne Wood site will make some of the shortfall left by the withdrawal of LI/11 & M1/38 Coniston Crescent. The Combined site is 49 Bradley Paddocks LI/7 plus 45 Bourne Wood LI/6 Total = 94: Both sites are low density with Green spaces.		
Griffiths Alan	LPPS183	33.29 Policy 33.16 School site Coniston Crescent MI/38 Other: Table 33.0.1	No	No		Justified	This site was added to the Revised Local Plan in November 2018, only 6 weeks before the final submission of the plan, a process which began in July 2013. Eight public drop-in sessions were held through 16th to 30th November 2018 so leaving only 2 weeks for concerned residents to collaborate, liaise with local representatives, consult outside organisations and prepare submissions. Beyond these sessions and a notice on the Council's website no official publicity was distributed to draw resident's attention to the last-minute inclusion of this site in the revised Local Plan. Alternative sites nearby in the same geographical area as this site were included earlier in the gestation of the Local Plan. These sites were dropped at some time during 2017-18 for the reason that they would impose unacceptable pressure on local infrastructure; specifically roads and road junctions. This site will utilise the exact same roads and junctions and will inflict similar, unacceptable pressure on them as were the cause of sites being withdrawn from the Local Plan earlier in the process. While this site was in use as a school it provided a buffer next to the golf-course which allowed a number of sensitive species to colonise the land including skylarks. The overall consultation process has favoured comments from residents regarding sites included early in the formulation of the Local Plan and disadvantaged those wishing to comment on the handful of sites added at the	1. This site should be returned to green field condition as per the conditional planning consent awarded in order that the new 6th Form could be built. 2. The Local Plan should be 'paused' while residents are given the same opportunity to review the sites added to the Local Plan at the last-minute as was afforded to sites considered last year.	No	

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							very last minute who have been presented with a fait accompli. The same consideration and assessment afforded to the 'early' sites should be given to the 'last-minute' sites. To do otherwise is not fair or democratic. Addendum Until recently, this site was a Local Authority Middle School and associated playground/playing field. Latterly, it was the 6th Form site associated with Stourport High School. The High School transferred to Academy status and sought planning consent to build a new 6th Form on an adjacent site (part of the playing fields). Planning consent was awarded with the requirement that the old 6th Form buildings be demolished and returned to green field condition to ensure no net loss of playing field area. The school reneged on the undertaking that they made and failed to demolish the old 6th Form which was left derelict for 3 years until it was the subject of an arson attack which prompted WFDC to obtain a demolition order against Stourport High School.			
Griffiths Alan	LPPS185	33.14 Policy 33.8 Land west of former school site Coniston Crescent LI/11 Other: Paragraph 33.14, Policy33.18, Table 33.01.0.1	No	No	No		This site was removed from green-belt in mid-October 2018 and added to the Revised Local Plan in November 2018, only 6 weeks before the final submission of the plan, a process which began in July 2013. Eight public drop-in sessions were held through 16th to 30th November 2018 so leaving only 2 weeks for concerned residents to collaborate, liaise with local representatives, consult outside organisations and prepare submissions. Beyond these sessions and a notice on the Council's website no official publicity was distributed to draw resident's attention to the last-minute inclusion of this site in the revised Local Plan. Alternative sites nearby in the same geographical area as this site were included earlier in the gestation of the Local Plan. These sites were dropped at some time during 2017-18 for the reason that they would impose unacceptable pressure on local infrastructure; specifically roads and road junctions. This site will utilise the exact same roads and junctions and will inflict similar, unacceptable pressure on them as were the cause of sites being withdrawn from the Local Plan earlier in the process. While this site was within the green-belt and allocated for	1. This site should be returned to green-belt immediately and be the subject of proper, public consultation as to whether it should be removed or remain green-belt. 2. The Local Plan should be 'paused' while residents are given the same opportunity to review the sites added to the Local Plan at the last-minute as was afforded to sites considered last year.	No	

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							sporting use it was managed as a golf-course which allowed a number of sensitive species to colonise the land including skylarks. The overall consultation process has favoured comments from residents regarding sites included early in the formulation of the Local Plan and disadvantaged those wishing to comment on the handful of sites added at the very last minute who have been presented with a fait accompli. The same consideration and assessment afforded to the 'early' sites should be given to the 'last-minute' sites. To do otherwise is not fair or democratic. Addendum `Until recently, this site was actively run as part of a golf course by private company who leased the land from WFDC. That business failed. A planning consent was given by WFDC in 2015. Neighbouring residents were not informed of this planning consent at the time, an omission by WFDC which elicited a formal letter of apology from the council leader to those residents that his council had kept in the dark. It seems that this council is attempting to repeat the same evasive tactics in 2018.			
Bradley Paddocks	LPPS45	School site Coniston Crescent MI/38	No	No	No		LI/11 & M1/38 Coniston Crescent HELAA 2018 REPORT description Former golf course (closed December 2016) adjacent to housing estate on northern edge of Stourport-on-Severn. WFDC OFFICER VIEWS from HELAA REPORT Currently undeveloped site so any development will have major impact. Development would however round off the urban edge at this location. Vehicle Access Poor, Development would require new access onto Kingsway and junction improvements to A451. MI/38 HELAA 2018 REPORT description Former school and playing field accessed from residential	Notes on why LI/7 Bradley Paddocks would be a viable alternative site. Extract from Wyre Forest District Council Green Belt Review May 2018 (describing the site) Adjacent to Lickhill Road North, the site is in grazing use. The land begins to fall away to the River Severn to the west and whilst visually enclosed by a substantial hedgerow to the north, has an open aspect to the west, with extensive views across to the dense woodland to the west of the River Severn. There is no public access and prior to site investigation, there are no recorded nature conservation or cultural heritage interests on the site. CONTRIBUTION The site makes a contribution to the Green Belt in this location by virtue of being part of wider undeveloped land which separates Bewdley and Stourport,	Yes	I would like to have the opportunity to an answer questions as to why Bradley Paddocks LI/7 should be considered as an alternative site to LI/11 & M1/38 Coniston Crescent.

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							road with allotments to north and former golf course land to west. WYRE FOREST GREEN BELT REPORT MAY 2018 There are a number of sites where the impacts are judged to be significant and damaging to the Green Belt, through their likely effect on openness. These sites are as follows and may require more specific attention in consideration of their impacts: This site gets a special mention LI/11 Former golf course off Windermere Way. The Green Belt report gives a SIGNIFICANT CONTRIBUTION for MI/38 The site is part of the remaining open land between Stourport and Kidderminster, the erosion of which would further narrow the already limited gap between the two settlements. Development would have to be considered in the context of proposals on an adjacent site – land off Windermere Way. Although part of a former school, the land retains an open aspect and visual relationship with the former golf course to the northwest and allotments to the northeast. Development would impinge upon the openness of the land and would, on its own, be an incongruous extension of the built edge of Bewdley. The GREEN BELT REPORT gives a SIGNIFICANT CONTRIBUTION for L1/11 The site is part of the remaining open land between Stourport and Kidderminster, the erosion of which would further narrow the already limited gap between the two settlements. Development would have to be considered in the context of proposals on an adjacent site – land off Coniston Crescent. The site and its wider context is characterised by a high degree of visual exposure which would be compromised by development, particularly in respect of the unbounded northeastern edge. Here, despite 'rounding-off' of the built edge, development would represent an extension into local countryside. The site allocations have to be based on evidence. All of the sites have been assessed against the same planning	EXTRACT FROM THE 2017 PREFERRED OPTIONS DOCUMENT Development includes the Bournewood Nursery site and the adjoining paddocks. These sites are well-screened by extensive tree planting and strong hedgerows although impact on views from across the River Severn will need to be carefully considered. It is agreed that Bradley Paddocks does make a contribution to the Green Belt but it was not given the SIGNIFICANT heading (see Green Belt report May 2018) that was attributed to both LI/11 & M1/38 Coniston Crescent and so is a better alternative with reference to the above report. ECOLOGICAL SURVEY COMPLETED 9/04/18 by HEC (full report sent to WFDC 28/11/18) available on request. Findings for LI/7 MAIN FINDINGS: • Land is generally of low ecological value & much of the site is ecological poor. • The external boundaries provide the most interest and valuable habitat. • Potential for bat flight corridor is concentrated along the margins. • Badger activity is present on the boundary. • Potential bird nesting within and around the boundaries. • Potential reptile habitat external of site. Conclusions: • The site is dominated by short grazed horse paddock and its affect upon the local species population is minimal. • Timing of work is to be programmed to reduce disturbance to wildlife i.e. dust, noise, lighting and silt. • Further badger survey required to establish presence/absence and population size.		

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							criteria to assess the suitability of each of them for development, focussing on the three elements of sustainability (environmental, social and economic) and incorporate consideration of other technical evidence generated in the preparation of the Local Plan SIGNIFICANT GREEN BELT CONTRIBUTION has clearly been ignored why did Wyre Forest pay for a report then ignore significant findings? • The land it now adjoins is the new Burlish Top nature reserve. The development will be clearly visible from the vantage point on the hill where it has been mooted to place the mobile café seating area to take in those fabulous views. • The car hard standing area for visitors to the nature reserve will be located 200m up the road, parking will not be extensive, but I was told the road has a number of spaces and no parking restrictions. So, we could see Kingsway requiring a complete makeover in an area that is an area of natural beauty. • The Green Belt plan is right this area has a SIGNIFICANT PART to play in the Green Belt. • An extra 315 homes mean 472 extra cars (1.5 Average per house) All using the Kingsway. The Kingsway is a narrow road with a poor junction near the busy Stourport High School. • The School buses use this junction as pickup point. I know it has been acknowledged in the report that the junction (Kingsway/A451) requires improvement but widening a road through a newly designated nature reserve is a bad idea. Slowing traffic/reducing traffic is much more sensible.	• Very little negative public opinion. • The site is not situated next to a designated nature reserve. But does benefit in that the site is 12 minute's walk away and so therefore can be used for recreational purposes. • The site does not have poor access via the congested A451Junction. Although the site was Not included in the Plan because of Highway constraints at Burlish Crossing, most of the traffic congestion is from Bewdley /Stourport along Bewdley Road. There is less congestion at the crossing from Lickhill Road end. The sites that could add to Burlish crossing congestion were all discounted on mass. The Crossing does have some additional capacity. OTHER POSITIVE CONSIDERSATIONS REGARDING THE SITE • Walkable distance to Burlish top and adjoining nature reserve on the Golf course 12 minutes. • Walkable distance to Stourport High School 30 Minutes. • Walkable distance to Memorial Park 15 minutes. • Walkable distance to Stourport-on-Severn Town centre 30 minutes. • This means the site is very desirable, sustainable and environmentally friendly. • Primary Schools at both Memorial Park and Burlish are also walkable see above times. • Well serviced by local buses. • The Site is deliverable without decontamination or piling issues. The substitution of this site along with the adjoining Bourne Wood site will make some of the shortfall left by the withdrawal of LI/11 &		

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								M1/38 Coniston Crescent. The Combined site is 49 Bradley Paddocks LI/7 plus 45 Bourne Wood LI/6 Total = 94: Both sites are low density with Green spaces.		
Burlish Concerned Residents	LPPS178	Table 33.0.1	No	No	No	Justified	This submission is on behalf of Burlish Concerned Residents group. The group includes upwards of 50 (and rising) residents of Burlish Park Estate who wish to speak with one voice to register their disquiet, unease and anger at the cavalier manner in which WFDC has unilaterally and without proper consultation made last-minute changes to the Local Plan. This site was added to the Revised Local Plan in November 2018, only 6 weeks before the final submission of the plan, a process which began in July 2013. Eight public drop-in sessions were held through 16th to 30th November 2018 so leaving only 2 weeks for concerned residents to collaborate, liaise with local representatives, consult outside organisations and prepare submissions. Beyond these sessions and a notice on the Council's website no official publicity was distributed to draw resident's attention to the last-minute inclusion of this site in the revised Local Plan. Alternative sites nearby in the same geographical area as this site were included earlier in the gestation of the Local Plan. These sites were dropped at some time during 2017-18 for the reason that they would impose unacceptable pressure on local infrastructure; specifically roads and road junctions. This site will utilise the exact same roads and junctions and will inflict similar, unacceptable pressure on them as were the cause of sites being withdrawn from the Local Plan earlier in the process. While this site was in use as a school it provided a buffer next to the golf-course which allowed a number of sensitive species to colonise the land including skylarks. The overall consultation process has favoured comments from residents regarding sites included early in the formulation of the Local Plan and disadvantaged those wishing to comment on the handful of sites added at the very last minute who have been presented with a fait accompli. The same consideration and assessment afforded to the 'early' sites should be given to the 'last-minute' sites. To do otherwise is not fair or democratic. Addendum Until recently, this site was a Local Authority Middle	1. This site should be returned to green field condition as per the conditional planning consent awarded in order that the new 6th Form could be built. 2. The Local Plan should be 'paused' while residents are given the same opportunity to review the sites added to the Local Plan at the last-minute as was afforded to sites considered last year.	Yes	I wish to excercise my democratic right to participate

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							School and associated playground/playing field. Latterly, it was the 6th Form site associated with Stourport High School. The High School transferred to Academy status and sought planning consent to build a new 6th Form on an adjacent site (part of the playing fields). Planning consent was awarded with the requirement that the old 6th Form buildings be demolished and returned to green field condition to ensure no net loss of playing field area. The school reneged on the undertaking that they made and failed to demolish the old 6th Form which was left derelict for 3 years until it was the subject of an arson attack which prompted WFDC to obtain a demolition order against Stourport High School.			
Sport England	LPPS280	Paragraph 33.39		No		Positively Prepared Consistent with National Policy	Sport England supports policy 33.20 which encourages proposals to further develop outdoor sports facilities at the existing sports hub site, however the policy does not sufficiently set out how this will be achieved, nor does it reference the Playing Pitch Strategy (PPS) nor the Built Sports Facilities Strategy (BFS).	Amend policy 33.20 and the associated reasoned justification in paragraph 33.39 to identify that the proposals will be delivered via developer contributions and other funding sources in accordance with the Playing Pitch Strategy and Built Sports Facilities Strategy in order to ensure that the policy is consistent with paragraph 96 of the NPPF	No	
Osborn Jayne	LPPS24	33.6 AKR/18	Yes			Justified	Extra houses on an already busy estate will cause major traffic problems due to the fact that there are already two adjacent primary schools on Stagborough Way which cause traffic problems each morning and afternoon. The quality of the ground is undetermined and may not be suitable for housing. The only access road to the site seems too narrow for the amount of cars that will be using it. There is a wealth of wildlife on the site which will be irrevocably be disturbed by a housing development.		No	

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 34: BEWDLEY

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Worcestershire County Council, Planning Economy & Performance	LPPS992	Policy 34					Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource) • WA/BE/1 Stourport Road Triangle • WA/BE/3 Catchem's End • WA/BE/5 Land south of Habberley Road	Policies 34.2, 34.3 and 34.4 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.		
Stuart-Smith Mark	LPPS594	Policy 34	Yes	Yes	Yes		Taking the housing needs away from the south side of the river is logically sound to alleviate traffic problems, and access to Highclere Fields, would be problematic and destroy the open countryside for all concerned.		No	
Stuart-Smith Sue	LPPS596	Policy 34	Yes	Yes	Yes		Very pleased that Highclere Fields have been removed from town plan.		No	
Booth Sarah	LPPS607	Policy 34	Yes	Yes	Yes		I support the Highclere Fields being removed. The traffic on Park Lane is already difficult especially around Snuffmill and Hernes Nest. I feel that the sites identified are more accessible. Also, the Fields are valuable to the landscape as a whole in comparison to the other sites identified.		No	
James Roy	LPPS610	Policy 34	Yes	Yes	Yes		No comment made.		No	
Holligon Sheelagh	LPPS612	Policy 34	Yes	Yes	Yes		I agree with the Local Plan, which I consider to be well though out, with regard to the proposed building sites in Bewdley.		No	
Hall Tony	LPPS614	Policy 34	Yes	Yes	Yes		I very much support the withdrawal of Highclere Fields as a potential development site: 1. The road infrastructure in Bewdley west of the river is incapable of supporting extra traffic generated by such a development. 2. The site has significant recreational and landscape value, as recognised by an earlier enquiry.		No	
Eve Joan	LPPS616	Policy 34	Yes	Yes	Yes		Good to see that no extra traffic will be going through Load Street, Bewdley. Most of the development will be on the right side of the river for jobs and access to services.		No	
Anderson Jeffrey	LPPS619	Policy 34	Yes	Yes	Yes		We all accept the need for new housing, but not at the expense of our current environment and the collapse of our current infrastructure and services. The draft Local Plan is a sensible compromise between these needs.		No	
Whetton E.K	LPPS621	Policy 34	Yes	Yes	Yes		No comment made.		No	
Jackson Doug	LPPS623	Policy 34	Yes	Yes	Yes		No comment made.		No	

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Perrin Richard	LPPS625	Policy 34	Yes	No	Yes	Justified	WA/BE/5 - Land South of Habberley Road. This should only be developed if a link road between Habberley Road and the Kidderminster Road is built to alleviate the dreadful traffic scenario that exists at present. WA/BE - Catchems End. The buffer zone between the bypass and the development and should be substantially larger to alleviate visual impact of the development. BR/BE/1 - fire Station Site - Development should be for elderly people only.	WA/BE/5 - Land South of Habberley Road. This should only be developed if a link road between Habberley Road and the Kidderminster Road is built to alleviate the dreadful traffic scenario that exists at present. WA/BE - Catchems End. The buffer zone between the bypass and the development and should be substantially larger to alleviate visual impact of the development. BR/BE/1 - fire Station Site - Development should be for elderly people only.	No	
Whetton Jayne	LPPS627	Policy 34	Yes	Yes	Yes		No comment made.		No	
Jackson Chris	LPPS25	Policy 34	Yes	Yes	Yes		No comments.		No	
Mayman Nick	LPPS195	Policy 34	Yes	No	No	Justified	The local figures in Table 6.0.2 show 225 new homes for Bewdley which should be scaled back to 158 to reflect the Plan's oversupply on the evidence contained in the Housing Need Study. There is further inconsistency with regard to site specific proposals for Bewdley. There does not appear to be an appropriate justification for suggesting 100 dwellings for the Stourport Road Triangle which table 34.0.1 confirms as having a much smaller gross site area than Catchem's End yet proposes only 75 dwellings there. Given the particular problems caused by school traffic I would question whether there has been sufficient co-operation with the County Council's Highways Department in proposing such a large scale development for an area already the subject of major dispute between local residents and the County Council.	Should Green Belt release be deemed appropriate for the Stourport Road Triangle then the proposed number of dwellings should be scaled back in line with previous contention that the Plan projects an oversupply in relation to projected Housing Need. A smaller scale development specifically for sheltered housing would satisfy the aging demographic identified elsewhere in the Plan for Bewdley.	Yes	To bring forward photographic evidence to support comments made on the impact of the Stourport Triangle development regarding School traffic.
Bennett	LPPS570	Policy 34	Yes	Yes	Yes		Pleased that these fields have been removed adjacent to Highclere. The problems of access and the damage to the beauty of the fields would have been horrendous.		No	
Bishop HV	LPPS572	Policy 34	Yes	Yes	Yes		No comment made.		No	
Booth Gary	LPPS574	Policy 34	Yes	Yes	Yes		No comment made.		No	
Frow Jennifer	LPPS576	Policy 34		Yes			No comment submitted.		No	
Gibbs Jayne	LPPS578	Policy 34	Yes	Yes	Yes		No comment made.		No	
Jones Richard	LPPS580	Policy 34	Yes	Yes	Yes		No comment made.		No	
Leach Tony	LPPS582	Policy 34	Yes	Yes	Yes		No comment made.		No	
Millinchip Robert	LPPS584	Policy 34	Yes	Yes	Yes		No comment made.		No	
Moody Helen	LPPS586	Policy 34	Yes	Yes	Yes		No comment made.		No	

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Packer Richard	LPPS588	Policy 34	Yes	Yes	Yes		I fully support Highclere Fields being removed from the allocated development sites as there is very poor road access in this area. The fields are a very valuable natural asset to the community and habitat for many birds and animals. The draft Local Plan meets the housing needs in Bewdley.	I fully support Highclere Fields being removed from the allocated development sites as there is very poor road access in this area. The fields are a very valuable natural asset to the community and habitat for many birds and animals. The draft Local Plan meets the housing needs in Bewdley.	No	
Postlethwaite Jennifer	LPPS590	Policy 34	Yes	Yes	Yes		No comment made.		No	
Slade Margaret	LPPS592	Policy 34	Yes	Yes	Yes		No comment made.		No	
Smith Helen	LPPS593	Policy 34	Yes	Yes	Yes		No comment made.		No	
Stuart-Smith Sarah	LPPS595	Policy 34	Yes	Yes	Yes		No comment made.		No	
Stelling William	LPPS597	Policy 34	Yes	Yes	Yes		No comment made.		No	
Stelling Charlotte	LPPS609	Policy 34	Yes	Yes	Yes		No comment made.		No	
Jackson Carol	LPPS611	Policy 34	Yes	Yes	Yes		No comment made.		No	
Holder Jacqueline	LPPS613	Policy 34	Yes	Yes	Yes		No comment made.		No	
Gibbs Ian	LPPS615	Policy 34	Yes	Yes	Yes		No comment made.		No	
Anderson Stuart	LPPS618	Policy 34	Yes	Yes	Yes		Good to see that no extra traffic will be going through Load Street, Bewdley. Most of the development will be on the right side of the river for jobs and access to services.		No	
Anderson Linda	LPPS620	Policy 34	Yes	Yes	Yes		I fully support the draft Local Plan as it protects the west side of Bewdley from over development.		No	
Smith Robert	LPPS622	Policy 34	Yes	Yes	Yes		No comment made.		No	
Holligon Eddie	LPPS624	Policy 34	Yes	Yes	Yes		The plan is well structured and protects the countryside west of Bewdley Town Centre whilst meeting the housing needs of the town.		No	
Sutherland Ann	LPPS626	Policy 34	Yes	Yes	Yes		No comment made.		No	
Gladman Developments Ltd	LPPS894	Policy 34	No	No	No	Positively Prepared Justified Effective Consistent	The development of land off the Lakes Road, Bewdley represents a logical and sustainable extension of Bewdley to meet both market and affordable housing needs. Land off the Lakes Road provides an inherently suitable and	Land off The Lakes Road Bewdley should be allocated for development for up to 100 dwellings	Yes	To discuss the issues raised in our written submissions.

<table>
<tr><th>Respondent</th><th>Response No.</th><th>Part of Document</th><th>Legally Compliant?</th><th>Sound?</th><th>DTC?</th><th>Reasons for being unsound</th><th>Summary of Response</th><th>Suggested Modifications</th><th>Attend Oral Examination?</th><th>Reason for Attending</th></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td></td><td>with National Policy</td><td>sustainable location for residential development. The site can be sympathetically developed to provide a logical extension to the settlement while reflecting the characteristics and setting of its location. The site is 3.61ha, which will enable the development of up to 100 dwellings in a location outside of the Green Belt.

Gladman submit that land off the Lakes Road, Bewdley is deliverable, as it is available now, offers a suitable location for development, and is achievable in the short term.

The Location Plan is attached.</td><td></td><td></td><td></td></tr>
<tr><td>Severn Trent Water Ltd</td><td>LPPS1055</td><td>Policy 34</td><td>Yes</td><td>Yes</td><td>Yes</td><td>Positively Prepared</td><td>We would like to draw your attention to the High and Medium risk sites which we would be keen to discuss further to understand likelihood and growth trajectories.
<table>
<tr><td>BR/BE/1</td><td>Bewdley Fire Station</td><td>Known sewer flooding issues immediately downstream, however due to small size of this development issues are not expected to be significant. We recommend that redevelopment of the site will remove existing surface water connections to the foul sewerage system and surface water is managed sustainably.</td><td>Medium Risk</td></tr>
<tr><td>WA/BE/3</td><td>Catchems End</td><td>Known sewer capacity issues downstream, pumping is likely to be required. Modelling will be required to determine the</td><td>Medium Risk</td></tr>
</table></td><td></td><td>No</td><td></td></tr>
</table>

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							<table><tr><td></td><td></td><td>impact.</td><td></td></tr><tr><td>WA/BE/5</td><td>Land South of Habberley Road</td><td>Known sewer capacity issues downstream, pumping is likely to be required. Modelling will be required to determine the impact.</td><td>Medium Risk</td></tr></table>			
Perrin Susan	LPPS191	Policy 34	Yes	No	Yes	Justified	WA/BE/1 Stourport Road triangle: Qualified Support use for housing and its removal from the Green Belt. WA/BE/5 Land south of Habberley Road. Qualified support. WA/BE/3 Catchems End. Qualified Support. BR/BE/1 Bewdley Fire Station site. Qualified support.	Site WA/BE/1Consideration should be given to creating a traffic island at the southern end of Stourport Road instead of the existing traffic lights. WA/BE/5 This development should only be allowed if an extension of the Bypass to the Habberley Road to mitigate the traffic chaos at Catchems End. WA/BE/3 This development will have a serious intrusive visual impact unless the buffer zone at the eastern end between the development and the By Pass island and road is substantially enlarged. BR/BE/1 The Fire Station Site. This development should have the sole use of providing residential apartments for the elderly	No	
Worcestershire Wildlife Trust	LPPS350	Policy 34-Bewdley Site Allocations	Yes	Yes	Yes		The WWT note and welcome the deletion of the previously proposed allocation at Highclere (BR5/BE6).		No	
Bennett Michael	LPPS571	Policy 34	Yes	Yes	Yes		No comments made.		No	
Booth Daniel	LPPS573	Policy 34	Yes	Yes	Yes		No comment made.		No	
Crank Barbara	LPPS575	Policy 34	Yes	Yes	Yes		No comment made.		No	
Gibbs Emma	LPPS577	Policy 34	Yes	Yes	Yes		No comment made.		No	
Hartley Peter	LPPS579	Policy 34	Yes	Yes	Yes		No comment made.		No	
Leach Evan	LPPS581	Policy 34	Yes	Yes	Yes		No comment made.		No	
Lloyd Kathleen	LPPS583	Policy 34	Yes	Yes	Yes		No comment made.		No	

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Moody Antony	LPPS585	Policy 34	Yes	Yes	Yes		No comment made.		No	
Packer Jennifer Anne	LPPS587	Policy 34	Yes	Yes	Yes		I fully support Highclere Fields being removed from the allocated development sites because there is very poor road access in this area. The fields are a very valuable natural asset providing a habitat for many birds, animals and flora and a great environment for the community to enjoy. The draft local plan meets the housing needs in Bewdley.		No	
Postlethwaite David	LPPS589	Policy 34	Yes	Yes	Yes		I support the 'Highclere Fields' being removed because of the very poor road access in the area and the important part of the fields play in giving access to the countryside to the west of Bewdley.		No	
Slade Michael	LPPS591	Policy 34	Yes	Yes	Yes		No comment made.		No	
Bewdley Town Council	LPPS234	Policy 34.1	Yes		Yes		Site BR/BE/1 Bewdley Fire Station does not address traffic management issues which will arise from additional vehicle use in this already congested area.	To widen the Dowles Road exit for drivers to get a clear view. Careful planning is essential to ensure that road safety is improved in this area.		
Environment Agency	LPPS972	Policy 34.1, Bewdley Fire Station BR/BE/1		No		Justified Effective Consistent with National Policy	We note that the majority of this site is within the floodplain, with 52% within Flood zone 3B (where such development should not normally be permitted), but we note it is brownfield regeneration.	Policy 34.1 - we would add an additional point: 1. Proposals for this site should address and aim to reduce and provide betterment to flood risk. Part of this site is located in flood zone 3 (defended by demountable barriers) and flood zone 2 (undefended). There should be no habitable rooms at ground floor level Contributions to flood defence maintenance/improvements, flood warning, may be required. 2. A site-specific FRA should determine levels with Climate Change allowances and take into account defence overtopping scenarios.		
Watkins Robert	LPPS599	Policy 34.1		No		Positively Prepared Effective	The Housing Needs Study 2018 rates a larger demand for 'older persons housing' (para 5.36) such that 3300 extra units are required over the plan period. Bewdley has specific demands for elderly units within its local needs, yet the only site allocated fro housing in Bewdley Town is BR/BE/1 in	Amend Policy 34.1 to state that site BR/BE/1 (Bewdley Fire Station) should be used for 'older persons housing'.	No	

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							Policy 34. Whilst Policy 34.1 sets reasonable design criteria it doe not allocate specifically for 'older persons housing. The BR/BE/1 site is perfect for 'older persons housing' and should be so allocated.			
Luxford Graham	LPPS78	34.2	Yes	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	Whilst I support the case for new housing developments to be located so as to avoid increased congestion and pollution in the centre of Bewdley [I objected to the Gladman scheme in Bewdley for this reason] I am concerned about the site on Stourport Road being identified for new housing. I have two particular concerns on this: - 1. Firstly the impact it will have along with the other allocated Wribbenhall sites on the already chaotic traffic congestion and parking problems experienced in the road generated by the two schools, Children's Centre, Sports Centre, Tennis Club and SVR and especially at school entry and finishing times. It is unclear as to how much benefit the new housing will bring to the school in terms of numbers attending, but it may require expansion of their facilities including additional classrooms, and it will certainly require increased parking provision for staff and increased journeys for parents doing the school run. It should be noted that there is no onsite parking provision for parents using the Children's Centre and that staff from the schools are already parking on Stourport Road, presumably because there is insufficient onsite parking. The description provided for development of the Stourport Triangle WA/BE/1 makes no reference to existing traffic issues and provides no reassurance that appropriate mitigating measures will need to be included. This is a significant omission and should be corrected accordingly. 2. The second concern is that I believe that land in this area should firstly be considered for retention for community and recreational use to deal with the lack of facilities and shortage of developable land in the town centre including the need for adequate long stay car and coach parking. If the Stourport Road Triangle is to be developed for housing, then it becomes imperative that other sites on the river side of the road, i.e. the schools, Leisure Centre and piece of land up to the new Bridge be earmarked for community and recreational use. In the past there has been talk of siting a theatre at the school for combined community use. My point here is that a comprehensive assessment of long term community and recreational need is required before land in this area is committed for housing and that in any event mitigating measures should be included with any new	The description provided for development of the Stourport Triangle WA/BE/1 should make reference to existing traffic issues and should provide reassurance that appropriate mitigating measures will need to be included.		

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							housing proposal to offset the current and potentially worsening traffic and parking issues. These measures to include: - a) The establishment of a long stay car park for the town including coach parking, preferably with toilet facilities that might also be used for the school, sports centre, tennis club and SVR visitors. b) 20mph zone from the By-Pass through to the town centre. Currently the schools will not encourage their pupils to cycle to school because of safety concerns on approach roads. This is a very sad state of affairs for a small town like Bewdley. c) Improvements to the riverside walks from the town through to the By-Pass bridge with easy access points from Stourport Road d) Investigation of possible relocation of Tennis Club to new site close to sports centre to share in use of community long stay car park. Existing site to become available for housing. Possible grants for new/ improved tennis facilities. e) Increased use of public transport, including exploring the possibility of shuttle buses running from the Bewdley estates through to the Wribbenhall estates calling in the town centre and the schools as well as improvements to infrastructure to encourage walking, cycling and alternative access arrangement to the schools and other facilities in the road to reduce the impact of car use, congestion and pollution. All of this, it would seem, is directly in line with other policies in the Plan, namely Policy 5 Overarching Sustainable development Principles, Policy 9 Health and Wellbeing and Policy 13 Transport and Accessibility			
Euro Property Investments Ltd.	LPPS790	policy 34.2	Yes	No	Yes	Justified	We support in principle the allocation of the above site for up to 100 dwellings and consider that the site is wholly suitable to accommodate new residential development. To assist in the consideration of the suitability of the site for allocation we attach a vision document that provides details of baseline conditions at the site in terms ecology, highways, flooding and drainage, heritage and landscape and visual impact. The assessment of baseline conditions has informed the identification of constraints and opportunities and these have informed the preparation of concept masterplan for the site. This demonstrates that the site is capable of accommodating the quantum of housing	See response.	Yes	We are promoting one of the four draft residential allocations in Bewdley and therefore key to the delivery of new housing in the settlement

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							proposed in the draft allocation i.e. Up to 100 dwellings, but also that suds and public open space can also be accommodated on site. We therefore conclude that the site is suitable for development, it is available and also developable. The site is therefore deliverable and will contribute to the supply of housing in the early part of the plan period. Notwithstanding our support for the proposed allocation, we have the following comments and suggested changes to the wording of the policy. In light of our earlier comments about the need to review the Green Belt, we support the site's removal from the Green Belt and its allocation for residential development. In relation to part 1 of the policy, it requires the gate in the wall to the walled garden to be used as pedestrian access to the site. However, the wall is outside of control epil, and therefore, it is not within their ability to maintain access via this gate. The policy as worded is not currently deliverable and therefore is unsound. We would, therefore, suggest that the policy is amended to delete the requirement to secure access through the gate/wall. Our concern is that epil would not be able to facilitate access and as such, development of the site would be contrary to the strict wording of the policy. It is our view that Pedestrian access to and from the site can be achieved elsewhere and whilst this connection would be an additional benefit, it is not necessary in its own right to make the site suitable for development. In respect of part 3 of the policy it seeks to restrict development on the site to two storeys in height in order to minimise the impact on views from/to Winterdyne house. We consider that this requirement is unduly restrictive as it does not have regard to the topography of the existing site. Furthermore, we consider that the proposed development could be enhanced by the selective incorporation of three storey development at key nodes or focal points within the development. Stipulating a blanket two storey restriction across the site could adversely affect the quality of the design and creation of a new streetscape. Epil are clearly aware of the proximity of heritage assets to the site and are not advocating that the whole site be			

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							developed out at three storeys or higher. However, we would like to see the potential to accommodate some variation in height across the site. As such, we would propose that wording of the policy is amended to read that "building heights should generally be two storey" therefore leaving scope to propose higher development in certain areas of the site where it would not adversely impact on heritage or other design concerns. Our suggested wording is: "3. Development should be designed to minimise adverse impact on both the SVR and Bewdley conservation area. Building heights should generally be restricted to 2 storeys to minimise impact on views from/to Winterdyne house (grade ii*)." In respect of part 5 of the policy, suds would be considered anyway as part of the development proposals as part of the outline drainage strategy that would be submitted with an application. There is an expectation that all new development will consider the use of suds and therefore, we query whether it is necessary to include this requirement in the policy. Similar to above, part 6 of the policy requires the submission of a site specific flood risk assessment (fra). As the site is larger than 1hectare in size, a fra would be required to be submitted anyway so again we question whether it is necessary to include this requirement in the policy. Our preference would be for both requirements to be deleted as they are effectively covered elsewhere and would be required anyway. In respect of parts 7 and 8 of the policy, these appear to be a duplication. We suggest one should be deleted as it appears to be a drafting error. Notwithstanding the above, soft landscaping provides very little acoustic screening and, therefore, if the intention is to seek mitigation along the site boundaries from noise, we do not consider that soft landscaping will have much of an effect. However, if the policy is worded so that landscaping could mean hard landscaping such as fencing, what is the justification for requiring this? Our view is that there would only be a need to provide mitigation along the boundaries if, following a noise survey, it had been demonstrated that there was something that needed mitigating. We, therefore,			

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							propose that the wording of the policy is amended so that it requires an assessment of background noise conditions to be undertaken and that if following the results of the survey, mitigation is required, that a scheme of mitigation is submitted and approved. We have no objection to the second part that seeks to protect and enhance existing hedgerows along the northern boundary to promote connectivity to nearby woodland. Our suggested change to the text of this part of the policy is as follows "a noise survey should be undertaken to establish existing background noise levels across the site. Should the findings of the survey indicate that these may adversely impact upon the amenity of new residents, then measures should be incorporated within the development to mitigate against this. Hedgerows should be protected and enhanced, especially along the northern boundary to promote connectivity to nearby woodland." In order to overcome our concerns over the soundness of the policy as set out above, the revised wording of the policy set out below would address this. The suggested wording of the policy should read: "policy 34.2 - Stourport road triangle WA/BE/1 The parcel of land is removed from the green belt and allocated for residential development. 1. Northern part of site adjacent Severn Valley Railway viaduct should Remain as open space with no built development. This is the site of the former walled garden (non designated heritage asset). The wall to the former walled garden of Sandboume house is to remain the existing gate in the wall used to provide pedestrian assess into the site 2. Development should respect the setting of the locally listed viaduct (northern boundary) and coach house and barn (west of site) 3. Development should be designed to minimise adverse impact on both the SVR and Bewdley conservation area. Building heights should generally be restricted to 2 storeys to minimise impact on views from/to Winterdyne house (grade ii*)."			

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							4. Enhanced green infrastructure should be provided alongside the Riddings brook with a buffer strip provided alongside 5. Suds should be provided on site to deal with additional surface water run off. These are to be used to enhance amenity areas and provide wildlife habitats. 6. A detailed site specifics flood risk assessment should be undertaken to confirm the extent and depths of flooding in the future and ensure that finished floor levels will be above any future flooding levels 7. A noise survey should be undertaken to establish existing background noise levels across the site. Should the findings of the survey indicate that these may adversely impact upon the amenity of new residents, then measures should be incorporated within the development to mitigate against this. 8. Hedgerows should be protected and enhanced, especially along the northern boundary to promote connectivity to nearby woodland. 9. Enhanced landscaping should be provided along the site boundaries to provide raised buffering.			
Pre-submission Anonymous	LPPS934	Policy 34.2 Stourport Road Triangle, WA/BE/1					I refer to Stourport Road Triangle in particular. Along side this parcel of land lies the existing access road to Spring Gorove Farms (before the bypass) and vehicular access road to the rear of Sanboume Stables . I wonder if you can ensure me that there are no plans to change this route in any future development. Thereby ensuring that entrance to this new development would be from Stourport Road.			
Campaign to Protect Rural England	LPPS517	Policy 34.2	Yes	No	Yes	Justified Effective Consistent with National Policy	This is a site which it is not necessary to remove from the Green Belt or to develop. Ridings Brook and the path beside it provide an appropriate boundary between the densely built up area of Bewdley and the countryside. This should remain so. The only building south of this line is the Bewdley Sports and Leisure Centre. Otherwise it is sports fields, one of the uses (other than agriculture) considered appropriate in the Green Belt The development of this site would have a significant landscape impact when viewed from Bewdley Bypass: driving south along this, the road is tightly enclosed by hillsides etc until it passes under the SVR viaduct and is immediately out into open countryside. In allocating this site, its landscape impact has not been adequately considered.	Delete site WA/BE/1.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 34: BEWDLEY

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Bewdley Town Council	LPPS900	Policy 34.2, Stourport Road Triangle, WA/BE/1	Yes		Yes		Proposed development will exacerbate existing traffic problems and make congestion in this area far worse.			
Pre-submission Anonymous	LPPS941	Policy 34.3					My concerns and objections do not comply with the specific criteria stated. However, although I have not been able to offer a legal argument I would still like to offer the following objections. The Catchem's End development, along with the Bewdley Triangle development would further exacerbate current traffic problems. There are already daily tail backs from the Safari Park travelling into Bewdley on the Kidderminster Road, at certain times of the day. Adding an additional access point from this road would greatly increase congestion. The local schools are situated on Stourport Road, where the Bewdley Triangle development is proposed. This road is already a concern for local residents, parents and schools, as parking and access are problematic. To build further housing would significantly add to the problem. It seems to me that Wribbenhall has been disproportionately identified for development, a view that has been voiced by many local residents, so in the light of the criteria of Justified and Effective, I feel that from a resident's point of view the Proposed Plan does not comply.			
Persimmon Homes Limited	LPPS794	Policy 34.3	Yes	No	Yes	Justified Effective	RPS supports inclusion of policy for development of land at Catchem's End on behalf of Persimmon Homes. However, RPS does not consider the policy to be clear or effective. A number of modifications are suggested to ensure compliance with NPPF and deliverability. Consideration should be given to the Vision Document.	In addition to the numbered policy requirements, there are other relevant considerations which the Council should be aware of, particularly in the treatment of information to be included within the Policy. Paragraph 34.9 of the consultation document indicates makes reference to two important factors – namely the need to remove the sites from the Green Belt, and the proposed quantum of development expected from the site. These factors are quite important to understanding the delivery of the site and it would be expected that this information is included within the body of the policy as it	Yes	A number of relevant considerations have been raised and RPS would welcome the opportunity, as the agent for the proposed allocation, to discuss these as part of the Examination.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								has (for the deallocation of the Green Belt) in the previous Policy 34.2. It is proposed that this information is inserted within the Policy as a precursor to the specific proposals for delivering the site. The second point relates to the extents of land within the Policy. Elsewhere in the Plan, a distinction is made between the different types of allocation for each area, including housing, employment and open space. As part of this policy, the two sites for housing and open space are dealt with under the same heading and although RPS understands why the Council has done this, given that Persimmon own both sites, it is queried whether it might be clearer to separate the classification of the sites, whilst remaining explicit that the open space will be delivered as a function of residential allocation. · Clause 1 and 7 – see above comments in respect of separation of housing/open space allocations. · Clause 2 – should be indicated in the second sentence that a small section of the boundary wall will need to be removed for visibility and for access to the site. · Clause 3 – Although RPS considers that the first sentence is appropriate, it is considered that the second sentence is too restrictive, and prevents the ability for enabling works, which could include sustainable drainage features, from coming forward. It is proposed that the second sentence is removed. · Clause 4 – Would recommend the inclusion of the word 'appropriate' ahead of play area, to ensure that what is delivered is commensurate to the proposed development · Clause 5 – Flexibility should be encouraged here and it is recommended that the term 'where possible' is included in relation to the retention of existing broadleaved trees. It is		

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								expected that any detailed proposal for development will be accompanied by an arboricultural survey, which will explore this matter in more detail, however it would be prudent to ensure the policy remains flexible to accommodate the development and this change is accordingly justified. · Clause 6 – Considered to be appropriate. · Clause 7 – Whilst is it agreed that this parcel should be used for open space, as indicated above, RPS would consider it more appropriate to include as a separate policy. Persimmon Homes intends to transfer this land parcel to Bewdley Town Council, or another appropriate body for future management. These discussions will continue in tandem with the progress of the Local Plan. · Clause 8 – It is unclear what this Policy is requesting and the justification for including this provision in respect of CIL Regulation 122. Although there is a brook which passes through the site, this passes onto third party land, outside of the control of Persimmon Homes. It is therefore unclear whether this can be delivered. It is proposed that this clause is removed from the policy. · Clause 9 – The footpath that bifurcates the two land parcels here already links Kidderminster Road to Sandbourne Lane via the 648(B) path. Whilst there may be potential for improvements to accessibility to be made here, this is considered to be outside of the remit of the developer, who will be transferring the open space parcel to the Town Council. · Clause 10 – This refers to connection between an area of wet woodland. This is currently outside of the land identified by the Council and subject to third party ownership restrictions. As such, it is queried whether this clause is appropriately justified and		

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								deliverable. · Clause 11- Whilst RPS acknowledges the biodiversity benefit of these proposals, it is unclear why the Council is requesting bat/bird boxes and hedgehog access for this site. As part of the reasoned justification, it would be expected that this evidence would be presented, justified by evidence. As currently drafted it is clear whether this relates to some or all the proposed properties and lacks sufficient clarity. Following the specific policy text, the Council has also included some text as part of Paragraph 34.10 under the subheading of 'reasoned justification'. RPS would expect to see a greater level of detail within this section, presenting the Council's clear need to release this site from the Green Belt in order to meet the development needs of the town and to ensure the delivery of housing in a sustainable location. In addition to this, RPS would also recommend including the justifications from the Council's evidence that support the release of the site from the Green Belt, consistent with the evidence base.		
Environment Agency	LPPS976	Policy 34.3, Catchem's End WA/BE/3		No			We note this site is partially located in Flood Zone 3, we have a flood embankment, control gate and trash screen assets further upstream of the Riddings Brook. We may seek contributions from developers to the existing defence / embankment for the riddings brook, this would be to help for general maintenance work of the embankment and trash screen. We would support Policy 34.3, point 8. The opportunity to open up Riddings Brook should be investigated.			
Bewdley Town Council	LPPS901	Policy 34.3, Catchem's End WA/BE/3.	Yes		Yes		The proposed development will exacerbate existing traffic problems and make congestion in this area far worse.			
Fleming Stella	LPPS4	WA/BE/3	Yes	Yes	Yes		No comment.		No	
Bewdley Town	LPPS902	Policy	Yes		Yes		The proposed development will exacerbate existing traffic	Bewdley Council consider that this land		

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Council		34.4, Land south of Habberley Road, WA\BE\5					problems and make congestion in this area far worse. The Environment Agency Flood Zone maps indicative this site is classified as a medium/low risk flood zone. Therefore the viability and suitability for sustainable housing on this land is questionable.	would be better suited for a link road between the A456 Bewdley to Kidderminster road and the B4190 Habberley Road.		
Campaign to Protect Rural England	LPPS520	Policy 34.4	No	No	Yes	Justified Effective Consistent with National Policy	We would have objected to this as unnecessarily narrowing the Green Belt gap between Bewdley and Kidderminster, which is already a very narrow one. The only saving grace we can see for this site is if it can be used to alleviate the very awkward and unsatisfactory western exit from B4190 Habberley Road. This could be done by using the site to include a new road to link Habberley Road to the roundabout at the eastern end of Bewdley Bypass. Thus the new estate road in connection with the development of the site would be built to a higher standard than a typical estate road, suitable to carry traffic between Habberley Road and the bypass. If this highway solution is not acceptable to WFDC and the Highway Authority, so that its development does not make a positive impact (provide a planning gain) to the area, then we would object to its development as narrowing the Green Belt gap.	Amend 34.4.2 to provide for a through link road joining Habberley Road to the roundabout at the east end of the bypass.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Carter	LPPS33	Para 34.9 Policy 34.3		No		Justified Effective	Request that the reference to potential use of land for allotments for the Western part be removed. Allotments are 1) not visually appropriate for what is currently a Green Belt area and according to the plan desirous of remaining visually appealing open space which allotments would visually destroy. 2) This is an area of low lying land that is frequently foggy (evidence of poor air quality exacerbated by being low lying) and allotment users like to make open fires to burn leaves etc thus will impact negatively on the respiratory health of nearby residents. The low lying area of this site collects standing water during heavy rain and creating reed beds or similar as part of a SUDS scheme could make a lovely wetland that helps to attenuate high rainfall events as is much needed! On a separate note the Eastern part of the site note No.2 states road access off Kidderminster road. I do not believe this is practical on a road that is frequently gridlocked	Remove reference to allotments on this site. Add a SUDS sustainable urban drainage scheme to create a local wetland or Reedbeds to the low lying part of the Western field. Proposed roundabout on the bypass with reduced bypass speed limit. Keep Bewdley visually separate from Kidderminster by reducing or not developing on the Catchem's end sites.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							between Catchems end and the roundabout. A better solution might be to reduce the bypass speed and add an access roundabout to the bypass. Developments on the very narrow strip of land Green Belt between Bewdley and Kidderminster could destroy the tourist attractiveness of Bewdley as it becomes melded into Kidderminster.			
Wood Stuart	LPPS64	Policy 34	Yes	Yes	Yes		The factors leading to the removal of the Highclere fields from the plan are totally sensible and include: Very poor road access The landscape value of the field and the use by locals.			
Bewdley Civic Society	LPPS188	Policy 34	Yes	No	Yes	Justified	WA/BE/1 Stourport Road triangle: Qualified Support use for housing and its removal from the Green Belt. WA/BE/5 Land south of Habberley Road. Qualified objection.. WA/BE/3 Catchems End . Qualified Support. BR/BE/1 Bewdley Fire Station site . Qualified support.	Site WA/BE/1The housing should be a mix of affordable homes, homes for the elderly and private housing. If this triangular piece of land is to be developed for housing, then it becomes imperative that other sites on the river side of the road, ie the schools, Leisure Centre and piece of land up to the new Bridge are earmarked for community uses. The addition of new housing may well benefit the school in terms of numbers attending but it might also mean that some expansion of their facilities will be required, including additional classrooms and increased parking provision. In the past there has also been talk of siting a theatre at the school for combined community use. A comprehensive assessment of community need is required before land in this area is committed for housing and that in any event, mitigating measures should be included to offset the current and potentially worsening traffic and parking issues. Consideration should be given to creating a traffic island at the southern end of Stourport Road instead of the existing traffic lights. WA/BE/5 The BCS remains very concerned with the impact this development may have on the openness and the important Green Belt tenet of preventing the coalescence and maintaining the visual gap between the towns. Its development should only be allowed in very exceptional circumstances ie to provide/fund/enable an extension of the	Yes	To reinforce our lay views contained in this response.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								Bypass to the Habberley Road to mitigate the traffic chaos at Catchems End. WA/BE/3 The BCS strongly objects to the development of the part of the site which is close up to the traffic island roundabout at the eastern end of the site. We acknowledge that a small buffer zone is proposed in this area but we consider this to be not extensive enough. Our reasons are that it will seriously diminish the openness of this narrow and highly sensitive part of the Green Belt between Kidderminster and Bewdley, and will have a serious intrusive visual impact on an area that is already to be seriously compromised by the development of the WMSP's development of a Waterpark and Hotel and Conference Centre alongside the bypass and will compromise the area's ability to maintain its identity. Unless a larger buffer zone is established the two developments together would significantly affect the openness and the visual gap between the two towns and being so close to Wribbenhall/Bewdley it will read as an extension of the built-up area. It will also compromise the established Green Belt principles of preventing coalescence, sprawl and encroachment and the preservation of the setting and special character of the historic town of Bewdley. Therefore the houses on the rest of this site should be of low rise design. BR/BE/1 The Fire Station Site. This is the only development site identified in Bewdley Town Centre. Indeed it is probably the only available site in the town centre. The Society supports its development. However we feel strongly that such development should have the sole use of proving residential apartment units specifically for the elderly. This statement is supported by the fact that the average age of Bewdley residents continues to rise and its popularity as a town which attracts retired people.		

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								ADDITIONAL SUGGESTIONS AND OMISSIONS: 1. A Policy to guide and direct the redevelopment and improvement of the Load Street car park area and the development of the former Surgery and Fire station site (as in the previous Local Plan Policy SAL.B1 Load Street Redevelopment area). There should be a Policy to produce a Development Brief to comprehensively survey and seek solutions to its pedestrian/vehicular conflicts and visual appearance. 2. A policy to improve Bewdley's parking regime, especially that on the Wribbenhall side. Suggest a scheme to use the Bewdley Rowing Club's car park thereby enabling a financial incentive to improve the Club's fortunes and property and help the town with its parking problems. 3. Suggest a specific policy to ameliorate and support the improvement of and prevent the dereliction of Buildings at Risk, specifically Bewdley Bridge, and the Old Workhouse. 4. Suggest a policy for the redevelopment and/or enhancement of: a) The riverside buildings from Bridge House to the Rowing Club, perhaps to provide additional housing and car parking b) The Workhouse site in High Street		
Wood K	LPPS66	Policy 34	Yes	Yes	Yes		The removal of Highclere fields from development is a sound decision.			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 35: PREVIOUSLY DEVELOPED SITES IN THE GREEN BELT

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Campaign to Protect Rural England	LPPS522	Policy 35 WMSLP	No	No	Yes	Justified Effective	While we accept the need for WMSLP to continue to flourish, we are concerned at the prospect of additional buildings on land (such as car parks) that are in fact essentially open, though (having a hard surface are technically "previously developed". Minor kiosks and such like would be unobjectionable, but the development of major new buildings on areas where existing development is merely a few inches high ought to be unacceptable.	Exclude the existing car parks from the area deemed to be previously developed, but providing a specific policy allowing kiosks and such like ancillary to car park use.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Hortons Estate	LPPS776	Policy 35	Yes	Yes	Yes		Modifications proposed.	We support the designation of the site as 'permitted development in the Green Belt'. We would want to be able to add existing floor area on the site. This would then enable additional employment to be created. Therefore, we hope that designation could be altered to allow additional floor space to be created. Of course, it is appreciated that this would need to be in conjunction with the nature of the environment. It is understood that appropriate planning applications would need to be submitted.	No	
West Midland Safari Park	LPPS876	35.3 to 35.5 and Policies Map	Yes	No	Yes	Consistent with National Policy	WMSP objects to the extent of the previously developed land (POL), as shown on the proposals map. Paragraph 145 of the National Planning Policy Framework states that a local planning authority should regard the construction of new buildings as inappropriate. There are a number of exceptions to this listed in the paragraph, including "limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which 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." RPS considers that the boundary should be the same as the 'Development Envelope' area shown in red on the plan (Figure 1) accompanying these representations. The general principle for the identification of major tourist attractions as major previously developed sites under PPG2 was to include all the main operational areas within the attraction, including buildings, amusement park rides and associated infrastructure, animal enclosures and lakes (where they fall within operational area). In the case of WMSP, the entire central core area (Spring Grove House, and its outbuildings, amusement park rides	RPS considers that the boundary should be the same as the 'Development Envelope' area shown in red on the plan (Figure 1) accompanying these representations. The general principle for the identification of major tourist attractions as major previously developed sites under PPG2 was to include all the main operational areas within the attraction, including buildings, amusement park rides and associated infrastructure, animal enclosures and lakes (where they fall within operational area).	Yes	To give more background and context to type of development envisaged at the Safari Park.

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							and associated infrastructure, the hippo lake and the Discovery Trail) have all been included in the POL on the proposals map. It is considered, however, that other operational land (including the Safari Drive), the car parks and the other lakes should also be defined as previously developed land. We welcome the inclusion of the hotel/waterpark site as that has an extant planning permission and will be implemented within the Plan period. However, the animal areas should also be included as they contain buildings and various other significant structures, such as fencing. Given the guidance in the National Planning Policy Framework, the designation of these areas would ensure that, by definition, only development that has no strategic impact on the Green Belt will be permitted without the need to demonstrate very special circumstances. All other forms of inappropriate development would need to follow the normal approach where very special circumstances would need to be demonstrated. This wider designation would not be a blanket designation where all forms of development would be acceptable at all locations within the park. This means that, for example, within the Safari Drive area, the replacement of buildings and structures for animals would not need to demonstrate very special circumstances. However, the intensification of these areas outside the parameters of the previously-developed site, or which would be harmful to openness, would need to demonstrate very special circumstances. This is particularly important at WMSP where animal houses and maintenance buildings need to be upgraded, relocated or replaced, and the POL designation would provide a framework for this. Essentially, the parameters within which development can take place would differ depending on which zone of the park the development proposed is within; so the Safari Drive would differ from the Amusement Park. Given the scale of the site, it is entirely appropriate to apply a POL designation to all of the operational parts of the site as shown in Figure 1. The undeveloped/non• operational areas should fall outside the POL envelope.			
Hortons Estate	LPPS777	Paragraph 35.6	Yes	Yes	Yes		Modifications proposed.	We support the designation of the site as 'permitted development in the Green Belt'. We would want to be able to add existing floor area on the site. This would then enable additional employment to be created. Therefore, we hope that designation could be altered to allow additional floor space to be created. Of	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								course, it is appreciated that this would need to be in conjunction with the nature of the environment. It is understood that appropriate planning applications would need to be submitted.		
Hortons Estate	LPPS778	Paragraph 35.7	Yes	Yes	Yes		Modifications proposed.	We support the designation of the site as 'permitted development in the Green Belt'. We would want to be able to add existing floor area on the site. This would then enable additional employment to be created. Therefore, we hope that designation could be altered to allow additional floor space to be created. Of course, it is appreciated that this would need to be in conjunction with the nature of the environment. It is understood that appropriate planning applications would need to be submitted.	No	
Hortons Estate	LPPS779	Table 35.0.1	Yes	Yes	Yes		Modifications proposed.	We support the designation of the site as 'permitted development in the Green Belt'. We would want to be able to add existing floor area on the site. This would then enable additional employment to be created. Therefore, we hope that designation could be altered to allow additional floor space to be created. Of course, it is appreciated that this would need to be in conjunction with the nature of the environment. It is understood that appropriate planning applications would need to be submitted.	No	
West Midland Safari Park	LPPS922	35	Yes	No	Yes	Effective	WMSP supports the designation of the Park as a previously developed site in the Green Belt in the Green Belt, and the support given by the Policy to development proposals that support and enhance the park's operations as a leisure and tourism destination. WMSP objects however to the section of the Policy which requires the design and landscaping of development to minimise the impact on the Green Belt through using sensitive materials and colours and providing extensive landscaping. RPS considers that these considerations do not impact on whether or not development is appropriate in the Green Belt, and proposing to control development in the Green Belt does not enjoy the support of Section 9 of the National Planning Policy Framework.	Other policies in the Local Plan, notably Policy 11 C and Policy 27C, along with the Councils' Design DPD can adequately deal with these matters.	Yes	RPS would like to elaborate on the extent to which other policies in the Local Plan, notably Policy 11 C and Policy 27C, along with the Councils' Design DPD can adequately deal with these matters.

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 36: RURAL WYRE FOREST

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Harrison Nikki	LPPS1062	36	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Objects to policy 36- Villages and Rural site allocations chapter in the Local Plan. Requests that sites at Plough Lane in Far Forest should be included for development. Believes that the land at Far Forest provides an excellent opportunity to make an contribution towards meeting local housing needs in Far Forest, a sustainable village unaffected by the Green Belt. The land was submitted to the call for sites and is promoted as a modest addition (16 dwellings) to the village, in a highly sustainable location sharing a boundary with Far Forest Lea Memorial Primary School and being very close to the local convenience store.	To include site at Plough Lane, Far Forest in policy 36 in the Local Plan.	Yes	In order to clarify our position on a number of complex technical matters, including landscape (and Green Belt), transport/highways and general planning matters including delivery and the duty to cooperate.
Priest Jonathon	LPPS36	BR/RO/2	No	No	No	Positively Prepared	Area BR/RO/2 Lem Hill nurseries lies in what for many years has been known area of outstanding beauty as quoted to myself on many occasions by planning officers and others. This has been reclassified as a brown field site with no consultation. The current poly tunnels most of which have not been used for many years are in a state of decay. The area already had almost 40 static caravans across the road which degraded the rural area. The traffic on this road is horrific and the section is very dangerous. To put more demand on this road is ridiculous. This proposed development will further destroy the rural visual appearance to people as they enter Far Forest. This also leaves a green field site between the settlement line and BR/RO/2 which no doubt will be the next area probably under the guise of infill. There are many areas around Far Forest that are better shielded from the main road.	I oppose developments of this type in rural areas. There should be a more sympathetic approach without large numbers of houses with all the associated problems they cause, i.e. Overload the drainage and Sewage systems both of which are already inadequate as the smell from the new storage tank demonstrates. Road noise which is already very high due to a large number of HGVs travelling to and from Clee hill quarry. Light pollution from the expected street lighting is going to adversely affect the wildlife habitat. Individual/small developments spread the impact of these problems across wider areas and maintains the rural feel and look of the area whilst providing the number of available houses.	Yes	I believe a number of local residents should meet with the Inspector to provide a balanced view before the inspector can make a sound decision.
Hodgkiss Fay	LPPS192	Policy 36.1 Site BR/RO/2 Lem Hill Nursery Far Forest	No	No		Positively Prepared Justified Effective	The site is a green space previously occupied by poly-tunnels for the adjacent Bill White's Nursery. The development would destroy valuable habitat for local flora and fauna. The disruption to wildlife in particular to the established hedgerows would be devastating. No ecological survey for this plot is evident in the Plan and I believe real constraints exist especially with the adjacent watercourse and SSSI. Village facilities have not been properly represented because we are not "well-served". The primary school is for all the district and pupils come from all over. There is no preference given to locals. The shop is a corner shop and villagers travel out to do their weekly shop. The public house has only a carvery restaurant with only a notional bar. The church is part-time with a vicar shared		No	

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							between our local parishes. The public bus service is minimal and a bus stop is some 400 yards up a very busy road. The majority of villagers use their cars for work and getting out so another 20 houses will only add to the villages traffic problems. The site is right at the edge of the WFDC's patch and is in fact outside our village curtilage area. This raises doubts about the actual benefits to the villagers themselves and the very real likelihood that the houses will be sold to the market for even more commuting families not benefiting the Wyre Forest economy.			
Lewis Gerald	LPPS629	Policy 36.1		No			The plan will remove employment opportunities and create demand for work by new households. It will increase commuting. There are 38 homes on Willows Park Homes. Opposite the development on an already very busy A road. The plan is significantly out side of the settlement boundary.	Changes would not make this plan work.	Yes	We need local voices to be heard.
Lewis Beryl	LPPS631	Policy 36.1		No			1. I understand this is Green Belt land. 2. The land is right opposite park Homes which stands at least 22 homes. 3. The cross roads to Church Lane, Buckeridge and Station Road meets this land. 4. Cleobury Road through far Forest has a very high volume of traffic.		No	
Parkes John	LPPS634	Policy 36.1	Yes	No	Yes	Justified Effective	The planned land is well separated from the settlement boundary, and the scale therefore changes the balance of the small community, and has significant visual impact on the landscape. An employment zone will be sacrificed to create homes that will themselves be needing employment opportunity. Employment an only be found by increasing the commuter traffic back to Kidderminster and the West Midlands, while council policy is to minimize long distance commuting. The development will add significant traffic to a busy A road, and have an entrance that is almost opposite a large mobile home site creating busy junctions on a main road. The councils own plan identifies the danger to SSI areas downhill from the site due to any water contamination, and it is unreasonable to believe a long term and total containment of run off can be achieved. The only need for housing identified in the council plan for Far Forest was for low cost and social housing yet economic pressures of past local developments have resulting in building		Yes	Local residents opinions should be heard

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							large family homes beyond the price local families can afford.			
Potter Nina	LPPS641	policy 36.1		No		Effective	1. the ground has been pastures for wildlife and now you want to develop on this ground where will the wildlife go. 2. Cleobury road is very busy with traffic travelling from Cleobury Mortimer. 3. There are crossroads at the bottom of this land. 4. There are already Park homes right opposite this proposed site. 5. I though this was a Green Belt area. 6. We don't have enough facilities in this village for more houses.		No	
Petition on Behalf of Far Forest Villagers and surrounding areas	LPPS828	Policy 36.1	Yes	No	Yes		(Petition 75 signatures) Policy 36.1 Lem Hill Nurseries BRIR0/2 States: The land as shown on the Policies Map is allocated for residential development for local needs as shown to be required in the latest parish housing needs survey. 1. Dwellings should be designed to be in keeping with their rural location 2. Development should be set back from the main road and be served off a single point of access to retain the linear building form of the settlement 3. A landscape buffer should be provided to the front of the dwellings to retain the rural aspect 4. Boundary hedges should be retained and enhanced 5. A tributary of Dowles Brook borders the site. Water treatment must ensure that there are no negative impacts on the watercourse which flows through the Wyre Forest SSSI further downstream The previously developed site is located just outside of the settlement boundary at Far Forest. It has no ecological constraints which would prevent it being brought forward for development. WFDC Reasoned Justification; 36.2 Far Forest is a well-served village with a primary school, shop, public house and churches. Other sites have been considered for allocation but these have all been Greenfield and ecological constraints would mean very limited numbers of dwellings could be developed. **Lem Hill Nurseries -** Known previously as Bill Whites Nurseries. The reasons for our objections are as follows;	We object to any development and do not understand why we are not within the Green Belt but only classed as countryside outside of this in the WFDC Local Plan Preferred Options Key Diagram. None of what we feel to be as the most important element of this part of the county and nationally, where it is renowned for is beauty, rare animals, plants, fauna and flora. The Wyre Forest and its surrounding meadows and fields and open space is included in the WFDC Green Belt. This is a shock. We feel overall that any building in this area will negatively impact on this locally important environment, its character within the area and threaten the village / rare meadows / fields in any future planning applications	No	

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							• The Wyre Forest District Council identify this land a having 'no ecological constraints which would prevent it being brought forward for development' However it also states that 'A tributary of Dowles Brook borders the site. Therefore the council states any water treatment must ensure that there are no negative impacts on the watercourse which flows through the Wyre Forest SSSI further. We believe that any formal building here will naturally heighten the risk of pollution to the important watercourses that run though the forest and related SSSI Sites. Dowles Brook is one of very few watercourses in the country that (and its tributaries) cross a lot of fields and woodland and as such is an extremely low polluted stream. Hence its importance to the ecology of the forest, its richness and diversity. We believe that any encroachment of housing, in this area has the potential for foul water to escape from pipe work into the stream, this includes pollutants from daily life unintentionally maybe but 20 houses is no small number and to believe this will have no negative impact on the water course and the existing forest it serves we feel is naive. The natural lay of the land also means that surface water moves down the hill and across the field towards the Forest and stream a short distance away. This is a natural event and at times of high rainfall will easily be a route to carrying any pollutants. The land is adjacent to a number of fields and a small close wooded area of pine trees within the vicinity, supporting a number of wildlife. The European Habitats Directory requires an assessment to be made of the possible effects of certain plans on the integrity of the site before a plan can be adopted. This is taken to mean, that it would be expected that any plan to develop this land would not progress at all and be seen as unfounded/not possible if protected and important species were found and /or the ecology of the land would be damaged. **Please Note:** *Photograph 1* - Flooding in Church Lane opposite Meadowcroft Cottage Church Lane. Lay of the land a short distance from identified plot. Drains unable to manage excess water. *Photograph 2* - Flooded paddock at Meadowcroft Cottage, Church Lane. Severn Trent Pumping Station situated next door to this property. The flooding also consists of untreated sewage. This has been reported to Severn Trent on a number of occasions over the years by the propriety owners. This situation still remains.			

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							Wildlife Conservation and ecology - A unique place to live 11.29,Protecting and enhancing Policy 11 D p.g 80, p.g 85 A Unique place to live 118, 11.3 section 3 i,ii,iii,iv,v p.g 80-81, Historic Environment 8 ii,ix p.g 77, 8 Rural Exception Sites iii p.g 94, Strategic Green Infrastructure 8 iii p.g 94, Infill Policy 188 a desirable place to live, ii 18.8.18.9 18.10 p.g 112 p.g113, Sustainable Tourism 23 p.137-144 Habitats regulations(HRA) screening requirement 1.4 Utilities - Sewage Systems and water Quality Policy 158 - section iii and section 15 p.g 97 15C - Flood Risk Management p.g 98 150 Sustainable Drainage Systems P.g 100 A desirable place to live - section 8 policy 8C point ii-iii p.g 55-56 Rural Development 28 Policy 288 p.g 97 and P.g 100. • We object to the belief by the Wyre Forest District Council that we are a well serviced village through its primary school, shop, bus service, public house and churches. This is a misconception and an idealised view. The school does not function as a 'local' school for the area alone but one for children wider afield e.g. from Bewdley, Stourport and Kidderminster. Children still have to be registered by parents to attend like any other and living in the village does not mean a place will be available. The Public House is a restaurant and serves mainly people from outside the area. It is not a social community public house that villagers regularly use, which we feel the statement made in the Wyre Forest District Council text would lead one to believe. We do have 2 churches but one does not have regular Sunday services as the Vicar has to move around the dioceses on a rotational basis and at present there has not been an actual a Vicar at the village's main church for over 12 months. The vicarage itself is up for rent and the church hall facilities in the village are also to be put up for sale. It is also important to point out the poor bus service available to the village for anyone who would need to rely on this for transport. You cannot function without a car here and if you travel to work as most people in the area need to do, as employment in the area is low, this can be costly for a low income family. Settlement Hierarchy Scoring System - Method used by WFDC in this process where identifying a good provision			

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							of service. • The Wyre Forest District Council point out that the land highlighted for the housing plan has been previously developed. We object to this image as there are only 2 open barn type structures on this site. It mainly consists of a number of poly tunnels, sheds and workshops. All classed as temporary buildings. This is currently a going concern and is a Nursery as the name implies. It offers employment to the area, which is low and offers community benefits from its talks on plants and demonstrations. We feel that this land is best kept within this keeping and has the potential for development for the local community around horticulture, local skills and country life. • We object and raise serious concerns over any proposed housing development on this site despite it being outside the stated Village Boundary. Our objection relates to the change of character to its surrounding area. In this instance the proposed 20 houses would be 'out on a limb' from the rest of the village which is less than 1 /4 mile in distance. And would be a 'blot on the landscape'. This site also raises major concerns for us a villagers as it would threaten the immediate landscape in that area, making it vulnerable for further building and similar development on surrounding meadow and fields. Adjoining and at the rear of the identified site are meadows, a number of which have never been used for arable farming and have only been used for grazing and haymaking which is traditional to the area. These lands are valuable to the richness of the Wyre Forest itself and the support they provide to its wildlife and natural flora and fauna for which the area is renowned. It is important to note that there have been adders spotted in this vicinity which is a protected species. The dark skies for the village are extremely important and one that should be protected and preserved. The dark skies are paramount to the richness of wildlife which lives here. The Wyre Forest is renowned for its variety of moths and bats, owl population. All of which can be found in this area adjacent and within the forest edge. This we urge needs to be respected and cherished. We believe that to develop Lem Hill Nurseries as a building plot will naturally have an impact on the adjoining land. It is a fact that houses bring noise, lighting, excess from daily human activities and pets, will all which have a negative toll on			

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							the area we respect and want to protect. We as Villagers cannot stress enough the importance of this area and this plot is just 'stones throw' from the edge of the forest. Any change to Far Forest in respect of these proposals will have no positive benefit to those individuals living there. Any development will only increase the issues traffic/sewage issues/ run off/light pollution/noise. *Wellbeing* - Health 9.1 - 9.1 O p.g 68-88 *Change of Character and landscape to the area* - Desirable place to live Ii.iii Section 8- policy SC p.g 55-56. Infill Policy 188 a desirable place to live, Quality Design and Local distinctiveness 27 p.g 154-164. Dark skies - Protecting and Enhancing Biodiversity and Geological Conservation policy 11 D P.g 80/81 p.g103 Policy C - Landscape Character p.g 79 • To access this area as identified by the Wyre Forest District Council it will need alteration to the entrance of the site concerned. We do not believe it is possible to retain the current hedges to enable a safe exit onto the A4117. This has become overtime an exceptionally busy road. The current entrance/exit is on the curve of a hill opposite 2 driveways and opposite a short way from the entrance to The Willows Park Homes site. To ensure that residents can move safely in and out of their estate a change in character would be required on safety reasons. This we believe would change the current character and have a negative effect on the landscape. The Wyre Forest District Council state 'A landscape buffer should be provided to the front of the dwellings to retain the rural aspect'. The objection to this is the fact that any houses built on this landscape will clearly not blend into the countryside. So therefore the Council is requesting frontage landscaping. The back of the houses are not even mentioned. These are fields and wide open spaces into which the houses will rise up. We object as this is a rural area, so to include the need to "landscape' specifically as a way of dubbing down 20 houses at the 'front' is not conductive to the landscape or character of the area. *Change of Character and landscape to the area* - Desirable place to live ii.iii Section 8- policy SC p.g 55-56. Infill Policy 188 a desirable place to live, Quality Design and Local distinctiveness 27 p.g 154-164. *Traffic* - Transport and accessibility in Wyre Forest p.g 85 Transport/Roads policy 13 managing travel demand Ai,ii,ii and B, Highways Network 13.12 p.g 88-89,			

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							Policy 16 - pollution and land instability 16.2 Policy 18 E p.g 114, Rural Development 28- policy 288 p.g 169 We feel the Local Plan is unsound; It is felt that the WFDC Planning has been conflicting in the information provided to the public in this process to date. It has made it difficult for us as individuals to be clear on what the council is proposing in their plan related to our village. It has changed its plans or has contradicted itself. Land deemed outside the village boundary at one point was not to be accepted as building land in the initial consultation plan, as we were led to believe. As in the 2017 consultation plan this was not acceptable, but now it is, as Lem Hill Nurseries site demonstrates! Land on the original 2017 plan has now been withdrawn and a totally new plot 'Lem Hill Nurseries' added, which previously was not a preferred site at all. Any building in this location was deemed by Wyre Forest District Council ' not considered to be a suitable location to prioritise new development'. In the beginning there was lots of reference to the village and its boundary. But when people asked what this was, no-one in the District Council could be clear on what this was or looked like. Now we do have a clear devised boundary but we feel that the council always has the upper hand, as the changes made to date demonstrates. It does not appear to matter whether land is now classed as 'infill' or outside the boundary, anything appears to be acceptable for building in our village. We feel that the plan is unsound as any acceptance of Lem Hill Nurseries for houses will affect the Village boundary again, hence threatening the rest of the precious fields, local woodland and close proximity tributaries to the Dowels Brook. This too threatens the total character of the Village. Any discussion had relating to this by Villagers with planning in consultation meetings 2017 or 2018 has always been illusive. We do not feel that this plan is sound, as it clearly threatens the sensitive and fragile ecological system in the area for which it is known. There is lots of assumption it seems made by the Wyre Forest District Council about the provision of the village, *the hierarchy scoring system* is clearly not up to date or has been misinformed, as our information in our petition clarifies. This also goes to the fact we were scored higher on villagers having services such as Doctors and Dentist within a nearer distance than Bewdley i.e. access in Cleobury Mortimer. It is just over 4 miles from Far Forest to Cleobury Mortimer and these services are in Shropshire and not Worcestershire. This also does not mean that we will be accepted as clientele there which was alluded to at a recent consultation meeting. We are in fact nearer from Far Forest to Bewdley, which is in Worcestershire, 4 miles			

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							away and towards which we pay our council tax. We do not feel that this is a sound reason for increasing housing in the area. Sewage and flooding is a regular occurrence in the village. The pictures submitted from Church Lane demonstrates this. We do not feel confident that any building here would guarantee any safeguards to prevent exposure of such a sensitive area and SSSI sites within easy reach and ease from pollution.			
Harris Olivia	LPPS628	Policy 36.1	Yes	No	No	Justified Effective Consistent with National Policy	Policy 27A quality design and local distinctiveness vii, viii, vii scale, height and massing. The proposal for 20 properties amount to over massing especially taking into account run off from the properties, there is no mentioned of filtration in the site via reed beds or such like which would thus seriously impact on further flooding of Church Lane. Also the potential risk of chemicals from car washing etc or sewage from the pumping station directly affecting two recognised SSI sites. VIII Links, connectivity and access Cars from Lem Hill site would be accessing the highway (A4117) which is known to have a problem with speeding vehicles as highlighted in November 2018 parish council meeting. It would also have a worrying impact for people living opposite with extra car users, potentially another forty and the right of way for accessing the A4117.	Vii scale, height and massing Sort out the drainage and filtration or the area. Reduce the number of proposed houses Viii Links, connectivity and Access Have site entrance as far away from the bend in the road as possible Consider a pull in area for car entering the site before the actual road	No	
Lewis Mark	LPPS630	Policy 36.1		No		Justified	I feel that there is no need or requirements for more houses in Far Forest especially as the plot off Bill white nurseries is out of the settlement boundary. The A4117 road is extremely busy and does not need another entrance attached onto it. We already have 38 park homes recently built directly opposite. All the people who will settle in these newly proposed houses will have to travel into the towns or city for work as there is no work and industry here locally s increasing the environmental impact and traffic congestion.		Yes	
Bundey Jacqueline	LPPS632	Policy 36.1		No		Justified Effective	It is outside of the settlement boundary. It is situated on a very busy road with very poor footpath provision. The road drains are prone to flooding. The primary school, shop, public house, village hall and Baptist church are all situated at the top of the village which is within the settlement area. The public bus service is very poor, has bats, deer, toads and nesting birds use the proposed site, at present, which makes it a sensitive habitat.	Outside settlement boundary Primary school, shop, public house, villages hall, Baptist Church are all situated at the tope of village and within the settlement area Any development would be better situated within settlement boundary and nearer to facilities. The transport system fro public use is poor and there is no bus service in the evenings. The bus shelter is also situated at the top of the village.	Yes	It is necessary to state the importance of the nature habitat. The infrastructure is very poor. The proposed development is situated on a very busy road. it is out of the settlement area where village facilities are to be found.

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Orford I.A.	LPPS639	Policy 36.1	No	No	No	Justified Effective	The Local Plan is unsound for the following reasons: a) Road safety - the area under consideration is very busy on narrow country roads and lanes. The roads i.e. the A4117 New Road and Church Land are already under stress. Points of acute stress for traffic are - New Road School - the whole of New road is choked on mornings and afternoons during school terms. the junction of New and the A4117 already dangerous. Junction of New Road and Church lane highly dangerous. The junction of Church Lane and the A4117 very highly dangerous (obscured view all 4 directions). The present continuing huge increase in the Sugars Lane caravan site with no end in sight, at no time does this site shut down for the annual 30 days as it should, therefore expanding the traffic in the area, and apparently will continued to expand, with dangerous results. b) Local Employment - virtually none existent - therefore workers on the proposed site will have to ravel - more traffic - more pollution. c) After the 10 year debacle of the Sugars Lane Sewage Pumping Station - it will be repeated d) All of the above continues to affect the local wildlife and fauna. So much for an area of outstanding natural beauty!	Do not allow any further building or development in or around Far Forest.	No	
Woodhouse Sandra	LPPS643	Policy 36.1	Yes	No	Yes		These comments are for this site only. Your due diligence is far from complete. There is conflicting information out there for the general public to view. The hierarchy scoring system is incorrect - needs updating. In 2017 consultation, we were categorically told NO BUILDING outside the settlement, 2018 settlement boundaries redefined and this plot appears to be well out. No satisfactory explanation given for the moving of the goal posts. No mention or recognition to the "Willows Park Homes" being the opposite side of the road. Did this plot have a "Name Change" to Lem Hill Nurseries from "Bill White Nurseries". A name that has been familiar for the past 20 years+. Was this to distance the part owner of this plot. Your transparency is clouded. This is employment land and should stay so in a village that has very limited employment. There is massive flooding in Church Lane from these fields building on them would only add to the problem. The A4117 which this would be turning on too is dangerous due to traffic continuing to speed. From your own reports Far Forest "given the location and accessibility of the area it is not considered to be a suitable location to prioritise new development".		No	
Pickett David	LPPS896	Policy 36.1		No		Justified	The objections are centred around Policy 36 'Villages and Rural	In order for the Local Plan to be made	No	

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and Mrs Marjorie						Consistent with National Policy	Areas Site Allocations' and the re-drawing of the defined settlement boundary for Far Forest. Policy 36.1 'Lem Hill Nurseries' (BR/RO/2) seeks to allocate 20 residential units in Far Forest off the A4117. The reason for this allocation is outlined in the reasoned justification as *'Far Forest is a well-served village with a primary school, shop, public house and churches'*. There is no objection in principle to this allocation. However, this allocation forms an integral component to our strong objections to the Council's decision to re-draw the settlement boundary to accommodate further infill residential development in the village. It is important to consider that as part of the Local Plan Review Preferred Options (2017), an allocation for residential development on land adjacent Tolland (Ref. BR/RO/4/6) was ruled out by the Council. The Officers comments for this were outlined as: *"The decision has been taken not to allocate these sites through this Local Plan. Further ecological assessment has been undertaken and the final report is awaited. If when the housing needs survey for Rock Parish is updated a requirement is found that cannot be accommodated elsewhere, these sites may need to be reconsidered. Only very limited development would be allowed with the potential to develop the orchard further for the benefit of the wider community".* A Preliminary Ecological Appraisal was subsequently carried out on this site on 5 October 2018. A copy of which can be found by the following link http://www.wyreforestdc.gov.uk/media/3991996/ADDENDUM-2-to-Ecology-Appraisal-of- WFDC-sites-for-allocation.pdf. The site was identified as a potential area for ecological value due to its proximity to Wyre Forest SSSI and possible species-rich grassland. The conclusions of this appraisal stated that: *"The presence and positions of ancient fruit trees and tree lines on two boundaries restricts developable area and layout. Due to the nature and configuration of the ecological constraints we caution that WFDC consider removing this site from allocation in its entirety".* The appraisal identified the following:	sound, the Council should revert the settlement boundary for Far Forest as per the previous Development Plan Core Strategy (2010). As outlined in question 6, there is no justified evidence to re-draw the settlement boundary and any such revision would not be in accordance with National planning policy. If you have any questions, please do not hesitate to contact me.		

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							<u>Features of biodiversity significance</u> • *Cherry trees showing some features of ancient trees (e.g. hollowing trunk, cavities and very rough and creviced bark), with a high likelihood of supporting the noble chafer beetle and potential to host roosting bats.* • *Mature trees on the southern (road-side) and eastern boundaries are important corridors at a landscape level.* *<u>Recommendations</u>* • *The ancient fruit trees must be retained (NPPF 18 paragraph 175c: development resulting in the loss or deterioration of irreplaceable habitats [such as ancient woodland and ancient or veteran trees] should be refused, unless there are wholly exceptional reasons…). The locations of the trees would make it very difficult to develop this site without removing or at least causing their deterioration.* It is therefore clear why this site was removed as an allocation, as there are significant constraints, which could impact negatively upon any planning application for new residential development. Notwithstanding this, the Council has sought to re-draw the defined settlement boundary in Far Forest to include the land advanced as a residential allocation. This would allow an infill development of up to 6 units in line with paragraph 36.18 of Policy 36. The Council's justification for re-drawing the settlement boundary in Far Forest is outlined in paragraph 36.18, which states that *"Development on Non-allocated plots in villages outside the Green Belt…To the west of the River Severn in villages and settlements outside the Green Belt, there is the potential to bring forward small infill plots for up to 6 dwellings. These plots can come forward under Policy 18B. Amendments have been made to settlement boundaries in a number of villages in Rock Parish to enable small sites to be brought forward for development. This will allow for limited development to help retain village services. Revised settlement boundaries are shown on the Policies Map. Any development will need to be carefully designed to reflect the characteristics of the settlement and take account of any existing constraints such as flooding, drainage, ecology and landscape".* The below images show the original settlement boundary (left)			

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							and revised boundary (right) As can been seen, the settlement boundary has been extended significantly to include land to the north, where vehicular access can only be provided off Plough Lane. The justification for re-drawing the settlement boundary in Far Forest is to allow new infill residential development for up to 6 residential units. By re-drawing the settlement boundary, the Council are effectively promoting the former de-allocated site for new residential development, which would likely cause significant harm to the important ecological features on the site. This would go against national planning policy as contained within the updated Framework (paras 174-175). There are also significant concerns over the justification to re-draw the settlement boundary in Far Forest in terms of the evidence base used by the Council. As part of the Local Plan Review, the Council produced a 'Settlement Hierarchy Technical Paper' (October 2018). The aim of the paper is to *"set out the background to the settlements within the District and provides a recommendation as to a suitable settlement hierarchy for use in the District's Local Plan. The paper reviews the services and facilities which are currently available within the settlements across the District. The evidence presented here demonstrates that the Settlement Hierarchy is the most suitable for accommodating the growth for the District…"*. The paper makes reference to Far Forest stating that *"This settlement is also located to the west of the District. Far Forest contains a number of facilities. The settlement has a convenience store including a Post Office, a Primary School, a Public House and a Village Hall. These facilities all provide important roles within the settlement and ensure that there remains an element of self-sufficiency. However, the settlement still relies on higher-order centres for a large number of services and facilities. Given the location and accessibility of the area it is not considered to be a suitable location to prioritise new development, aside from potentially catering for any identified local need" . (My emphasis)* The last sentence in the paper clearly outlines that there is no justifiable evidence to prioritise new residential development in this area. Notwithstanding this, an allocation of 20 units has been identified by the Council along with a new revised settlement boundary, which could accommodate up to a further 12 units on two infill sites (e.g. Orchard House and Plough Lane). This could			

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							amount to a total of at least 32 new dwellings in a location that is not considered to have good accessibility to higher order centres. This goes against the evidence contained in this paper. At the very least, if the allocation at 'Lem Hill Nurseries' is considered sound; then there is no evidence to suggest that the settlement boundary for Far Forest requires amending to accommodate further sites for residential development. There is no evidence to justify why further residential development is required in this village. Looking at the Individual Settlement Analysis (Appendix A) of the paper, it is clear that Far Forest is in the bottom 4 (out of 15) locations in the District in terms accessibility to services such as a Post Office; G.P; Public House; Dentists; Convenience Store; Bus services frequency and destination; Primary School; Secondary School; Public Hall; Employment Opportunities and Railway Station. One of the villages identified as being similar to Far Forest (i.e. Clows Top) in terms of accessibility does not include any revisions to their settlement boundaries to accommodate further infill development. This village is also not subject to any allocations for new residential development. It should therefore follow that in order to help retain the village facilities (as promoted by the Council in para 36.18) of Clows Top, then small infill residential developments would be appropriate in this locations rather than a village, which already has an allocation for 20 residential units. The Council's strategy for amending the settlement boundary of Far Forest is not justified on proportionate evidence. This is especially the case when there are reasonable alternatives (i.e. Clows Top), where new infill residential development would be more appropriate in terms of their accessibility to higher order centres and retaining their village facilities. It is also our contention that the amendments to the settlement boundary of Far Forest will result in potential windfall sites, which will fail to accord with local and national policy guidance. As highlighted above, the land adjacent of Tolland is identified as of high ecological value. Therefore, any proposal for infill residential development is likely to result in significant harm. By including both land adjacent to Tolland and Orchard House, it is clear that there will be only one access point into these parcels of land off Plough Lane. Any infill scheme for both parcels could			

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							result in the provision of 12 new properties. Plough Lane is a minor rural road and designated public right of way. Any intensification of traffic movements along this narrow track will likely cause significant harm to highway and pedestrian safety. The key constraints of Plough Lane are as follows: • It is a Public Footpath (Worcestershire path number RK-541 {label 541B} • Has no legal right of use for motorized vehicles (Section 34[1] of the Road Traffic Act 1988) except for long term established use by its 13 properties. • Is single track being 2.8 metres wide. • Has a (mostly) rough broken metalled surface. • Has a dangerous exit onto A4117. • Is directly opposite a busy public house car park. • Is adjacent to a busy shop car park. • Is directly opposite the bus stop. • Is not wide enough to allow 2 vehicles to enter/leave at the same time. • Has poor visibility to the right because of bollards and parked vehicles (including HGVs) outside Forest Stores. • Has poor visibility to the left due to the rise in the A4117 from the junction. • New infill residential development for up to 12 new properties will fail to accord with paragraph 108 of the updated Framework which seeks to ensure that development results in a safe and suitable access to a site, which can be achieved for all users. <u>Conclusion to Question 6:</u> The National Planning Policy Framework (NPPF) (para 35) states that to be sound a local plan must be: • *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;* • *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;* • *Effective – deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*			

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							• *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.* It is our contention that the Council's updated Local Plan cannot be found sound. The re-drawing of the settlement boundary in Far Forest has not been justified through an appropriate strategy taking into account reasonable alternatives or proportionate evidence. The above representations make this very clear. This therefore leads to a Local Plan, which fails to accord with the national policy and will not deliver sustainable development as defined by the updated Framework. I would therefore respectfully request that the Inspector finds the updated Local Plan unsound.			
Pickett David and Mrs Marjorie	LPPS897	Policy 36.2		No		Justified Consistent with National Policy	The objections are centred around Policy 36 'Villages and Rural Areas Site Allocations' and the re-drawing of the defined settlement boundary for Far Forest. Policy 36.1 'Lem Hill Nurseries' (BR/RO/2) seeks to allocate 20 residential units in Far Forest off the A4117. The reason for this allocation is outlined in the reasoned justification as *'Far Forest is a well-served village with a primary school, shop, public house and churches'*. There is no objection in principle to this allocation. However, this allocation forms an integral component to our strong objections to the Council's decision to re-draw the settlement boundary to accommodate further infill residential development in the village. It is important to consider that as part of the Local Plan Review Preferred Options (2017), an allocation for residential development on land adjacent Tolland (Ref. BR/RO/4/6) was ruled out by the Council. The Officers comments for this were outlined as: *"The decision has been taken not to allocate these sites through this Local Plan. Further ecological assessment has been undertaken and the final report is awaited. If when the housing needs survey for Rock Parish is updated a requirement is found that cannot be accommodated elsewhere, these sites may need to be reconsidered. Only very limited development would be allowed with the potential to develop the orchard further for the benefit of the wider community".*	In order for the Local Plan to be made sound, the Council should revert the settlement boundary for Far Forest as per the previous Development Plan Core Strategy (2010). As outlined in question 6, there is no justified evidence to re-draw the settlement boundary and any such revision would not be in accordance with National planning policy. If you have any questions, please do not hesitate to contact me.	No	

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							A Preliminary Ecological Appraisal was subsequently carried out on this site on 5 October 2018. A copy of which can be found by the following link http://www.wyreforestdc.gov.uk/media/3991996/ADDENDUM-2-to-Ecology-Appraisal-of- WFDC-sites-for-allocation.pdf. The site was identified as a potential area for ecological value due to its proximity to Wyre Forest SSSI and possible species-rich grassland. The conclusions of this appraisal stated that: *"The presence and positions of ancient fruit trees and tree lines on two boundaries restricts developable area and layout. Due to the nature and configuration of the ecological constraints we caution that WFDC consider removing this site from allocation in its entirety".* The appraisal identified the following: *Features of biodiversity significance* • *Cherry trees showing some features of ancient trees (e.g. hollowing trunk, cavities and very rough and creviced bark), with a high likelihood of supporting the noble chafer beetle and potential to host roosting bats.* • *Mature trees on the southern (road-side) and eastern boundaries are important corridors at a landscape level.* *Recommendations* • *The ancient fruit trees must be retained (NPPF 18 paragraph 175c: development resulting in the loss or deterioration of irreplaceable habitats [such as ancient woodland and ancient or veteran trees] should be refused, unless there are wholly exceptional reasons…). The locations of the trees would make it very difficult to develop this site without removing or at least causing their deterioration.* It is therefore clear why this site was removed as an allocation, as there are significant constraints, which could impact negatively upon any planning application for new residential development. Notwithstanding this, the Council has sought to re-draw the defined settlement boundary in Far Forest to include the land advanced as a residential allocation. This would allow an infill development of up to 6 units in line with paragraph 36.18 of			

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Historic England	LPPS226	Policy 36.4	Yes	Yes	Yes		Typographical error – 'Conservation' instead of 'Conservation Area'.	Include 'Area' after 'Conservation' for completeness and clarity.	No	
Barker Richard	LPPS138	36.7	Yes	No	Yes	Justified Effective Consistent with National Policy	The land in question is in a conservation area and is accessed via a narrow, single track private road. It is understood that to be the site of the burial of cattle with foot and mouth disease. The access road already serves a site of eight garages and seventeen houses and is a public right of way by foot to Chaddesley Woods and the school and allotments. Ingress and egress at the junction	The site immediately to the south of the proposed site is more suitable for reasons of access and safety.	Yes	To highlight the access problems with proposed site as a resident.

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							of Fold Lane and the Village is already dangerous, particularly when vehicles are parked on both sides of the road. It is impossible to see traffic approaching from either direction as visibility is impeded by parked cars. The addition of a further twelve cars from six houses would not only increase the danger at the junction with the village but will also create further deterioration to the private road, which apparently will not be adopted. All services will have to go to the foot of the lane if development takes place and it is questionable as to whether or not the services are adequate to cater for an additional six houses. For these reasons I believe the site is unsuitable for inclusion in the Plan. I believe that the site immediately to the south of the proposed field is more suitable for development and would not create the same dangers with access. The site comprises approximately 7,450 square metres and has an existing access on to the main A448 Kidderminster to Bromsgrove Road. The access is in a 30 mph road and the sight lines are good in both directions. The use of this site would still leave a further field between Chaddesley Corbett and Lower Chaddesley so that they remain separated. For these reasons I believe that the lower field should be adopted for inclusion in the Local Plan as a more suitable site based on proportionate evidence			
Sowerby Helen	LPPS89	Policy 36.7	No	No	No	Justified	In Conservation area. No consideration to local area and access It is both a public footpath and an unadopted lane which is used by schoolchildren to attend Chaddesley Corbett School		Yes	Infrastructure totally inadequate
Green Richard	LPPS692	Policy 36.7	No	No		Positively Prepared Justified Effective Consistent with National Policy	1. I do not know what procedures WFDC have to follow when going through this process but presumably they have to consult with those affected. There has been no consultation whatsoever In this case. We only became aware of the proposal when we were informed by our Parish Council a matter of days before the alleged consultation was to close. 2. The proposed development is in the Green Belt and the Conservation Area. No exceptional circumstances have been identified to permit such a development. 3. The proposed development is contrary to the Parish Council Neighbourhood Plan. That plan requires WFDC to consult with	The site should be allocated as suitable for development as it is both the Green Belt and the Conservation Area and no exceptional circumstances exist to allow development in these areas.	Yes	

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							the PC to identify suitable exception sites. I understand that no such consultation has taken place. 4. Whereas the PC Neighbourhood Plan has identified a very limited housing need subsequent events have shown that there is In fact no such need. The developer of the recent development at the old school site has been unable to sell a number of the dwellings on that site thus evidencing the lack of need for more housing in the village. Any decision therefore should not be made until the soon to be updated Neighbourhood Plan has revisited the question of local housing need. 5. Even If there was a housing need the proposed development would not meet that need. The Neighbourhood Plan identified a need for affordable housing for local first time buyers and small families. No property built in the Village would satisfy that criteria as the value of the houses would be too high. Again history has shown from the development at the old school that a number of the properties sold were purchased as second homes by people already living in the village for rental /investment purposes only. One local resident has purchased a house. None of the tenants In the rented houses are local residents. The developer was asked to market the properties to local people only by the PC in the first instance. After three months of no interest the properties were put on the open market. 6. Again even if the intention was to build for the elderly any houses freed up as a result would not satisfy the wrongly identified housing need as they would be too expensive and as before would be purchased by others for investment/rental purposes. 7. Given the above the harm caused to the Green Belt and the Conservation Area would far exceed any perceived public benefit. 8. The proposed access along Fold Lane is entirely inappropriate. Any further traffic using what is essentially a footpath would be dangerous. Even with its current usage It is often necessary to reverse out onto the high street when meeting oncoming traffic. Such a manoeuvre is extremely dangerous given the permanent presence of cars parked by the entrance to the lane. 9. The Neighbourhood Plan, Identifies the PC's wish to encourage tourism. The greatest magnet for tourism in the village Is walking particularly In Chaddesley woods. The main access to the woods from the village is up Fold Lane. The first of many glorious views on such a walk is across the land that it is proposed to develop to Rushock Church and the Malvern Hills. The development would therefore affect the enjoyment of users of the footpath and damage the PC's wish to encourage tourism. 10. The site falls within the protected view 640 in the Neighbourhood Plan and therefore should not be allocated. 11. The proposed development is on land sloping down to Fold			

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							Lane. In periods of heavy rain Fold Lane floods. Any further development as proposed would increase the amount of water running into Fold Lane and exacerbate the problem. 12. There is at least one listed building adjoining the site of the proposed development and the building of six modern bungalows? would be completely out of character with that and other surrounding buildings. 13. Other sites were identified in the Green Belt but not in the Conservation Area. These were rejected without any explanation as to the effect on the Conservation Area. In addition a recent planning application for three small houses at the doctors' surgery was refused.			
Webb Martin	LPPS431	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the council intended to formally notify all households in the district of the consultation. None of the households on Caunsall and probably all of these in Cookley didn't receive this notification (over 100 in Caunsall and 100? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered fro on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated 'The Green Belt will only be considered for development as a last resort.' Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							and would be out of character with this part of the hamlet of Caunsall which is characterized by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. this land is a valuable food resource and this will become more so as our ever increasing population demands more food. 10. Any development would create a physical barrier to a long well established natural wildlife corridor between the Stour Valley and Kinver. 11. The site assessment study contains several inaccuracies which when corrected pain the site in a much less favourable light and unsuitable for the type of housing need identified. 12. Why is it that this good quality, greenfield, Green Belt agricultural land is being sacrificed for just "up to 4 houses". 13. The total provision of 5,500 dwellings is at best an educated guess. Those envisaged for this site make no significant difference to the overall provision whether they are included or not. Housing allocation site WFR/WC37 Caunsall Road, Caunsall DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances of compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan.			
Moss Racheal	LPPS433	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the council intended to formally notify all households in the district of the consultation. None of the households on Caunsall and probably all of these in Cookley didn't receive this notification (over 100 in Caunsall and 100? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered fro on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated 'The Green Belt will only be considered for development as a last resort.' Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterized by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. this land is a valuable food resource and this will become more so as our ever increasing population demands more food. 10. Any development would create a physical barrier to a long well established natural wildlife corridor between the Stour Valley and Kinver. 11. The site assessment study contains several inaccuracies which when corrected pain the site in a much less favourable light and unsuitable for the type of housing need identified. 12. Why is it that this good quality, greenfield, Green Belt agricultural land is being sacrificed for just "up to 4 houses". 13. The total provision of 5,500 dwellings is at best an educated guess. Those envisaged for this site make no significant difference to the overall provision whether they are included or not. Housing allocation site WFR/WC37 Caunsall Road, Caunsall DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances of compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan.			

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Moss Sean	LPPS435	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the council intended to formally notify all households in the district of the consultation. None of the households on Caunsall and probably all of these in Cookley didn't receive this notification (over 100 in Caunsall and 100? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered fro on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated 'The Green Belt will only be considered for development as a last resort.' Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterized by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food. 10. Any development would create a physical barrier to a long	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	Yes	This developing of site would spoil rural outlook of beautiful hamlet. It would be developed into executive homes not retirement property which is needed.

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							well established natural wildlife corridor between the Stour Valley and Kinver. 11. The site assessment study contains several inaccuracies which when corrected paint the site in a much less favourable light and unsuitable for the type of housing need identified. 12. Why is it that this good quality, greenfield, Green Belt agricultural land is being sacrificed for just "up to 4 houses". 13. The total provision of 5,500 dwellings is at best an educated guess. Those envisaged for this site make no significant difference to the overall provision whether they are included or not. Housing allocation site WFR/WC37 Caunsall Road, Caunsall DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances of compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan.			
Powderhill Linda	LPPS439	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Atkin Jayne	LPPS441	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Grove Steve	LPPS446	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Anderson Donald	LPPS449	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food. 10. Loss of on road parking which is limited in the village and used by visitors to the local pub. 11. Has consideration been given to the additional traffic created by the development using the original canal bridge.			
Stewardson Angela	LPPS452	Policy 36.10	No	No	No	Positively Prepared Justified Effective Consistent with	1. Was not positively prepared because no residents in Caunsall were notified and residents only found out by word of mouth. 2. I do not feel it is justified or consistent with national policy because this is Green Belt land and there are no exceptional circumstances to justify development. This will be for executive homes, which does not fit the need identified in the local housing	I feel this site needs to be removed from the local plan, because the development would make no contribution to identified local housing needs.	Yes	I feel strongly that Green Belt land needs to be protected, particularly from unnecessary development.

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						National Policy	plan.			
Timmins Josh	LPPS454	Policy 36.10		No	No	Justified Effective Consistent with National Policy	No one attempted to tell me/or any other residents of the potential housing directly opposite my property. The Council had a legal obligation to notify all residents that would be affected following a plan application.	Housing application as discussed must be removed as I believe it doesn't contribute towards the community and only increases risk to local residents as well as myself. As I have already experienced the dangers of Caunsall Road following a crash which left me with injuries and a written off car due to the busy nature and high speed of the road. Adding more residents will only increase traffic and danger.	No	
Moss Dean	LPPS457	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Grainger Robert	LPPS459	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Hope David	LPPS462	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings.	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Nicklin Carol	LPPS464	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road.		No	

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							2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Oakley Kate	LPPS469	Policy 36.10					1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Pinchin David	LPPS482	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan.	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Lawrence Keith	LPPS485	Policy 36.10		No	No	Justified Effective	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district	Housing allocation site WFR/WC/37 needs to be removed from the local plan	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Consistent with National Policy	of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley,	as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.		

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Lawrence Maureen	LPPS489	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Baylie Jane	LPPS492	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land,	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the housing needs of the district		

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Harper Karen	LPPS495	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall,	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more			

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							food.			
Mills Pauline	LPPS498	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district	No	

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							part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Robinson Rowan	LPPS501	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Counsell Sharron	LPPS504	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable unnecessary and make no contribution to the identified housing needs of the district	No	

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							will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Roberts Susan	LPPS506	Policy 36.10		No	No	Justified Effective Consistent with National	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Policy	became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to	needs of the district		

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							Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Young Catherine	LPPS508	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Egginton Georgia	LPPS512	Policy 36.10	No	No	No	Justified Effective Consistent with National Policy	None of the local residents have been made aware of the potential development directly opposite our housing. I was only made aware when a fellow neighbour started looking into it following recent activity on the field. As I understand the council are legally obligated to inform residents as soon a development application has been filed.	I believe the housing application must be removed as if it goes ahead it increases the current road danger for local residents. The traffic along Caunsall Road is already horrendous and by adding more housing it will only increase the risk. As this road is full or blind turns it would be near impossible	No	
Nicklin Carol	LPPS737	Policy 36.10				Justified Effective Consistent with National Policy	1.I understand as part of the local plan consultation process the Council intended to formally notify all households in the District of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley) it was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. 2. Housing allocation site WFR/WC/37 Caunsall Road Caunsall DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield, agricultural land needs to be included in the Local Plan. Reasons/Justifications		No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderley persons dwellings. 4. Affordable housing will not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt, agricultural land for housing. 6.The Council Leader has stated 'The Green Belt land will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this partof the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Howlett Margaret	LPPS404	Policy 36.10		No	No	Justified Effective	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only be chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WO/37 Caunsall Road, Caunsall, DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances or compelling reasons why this Green Belt greenfield agricultural land needs to be included in the Local Plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to includes small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly resid3ents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The Council Leader has stated " the Green Belt will only be considered for development as a last resort". Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be	Housing allocation site WFR/WC/17 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make on contribution to the identified housing needs of the district	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Templeton Gregor	LPPS406	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the District of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000 in Cookley?). It was only by chance I become aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing Allocation Site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated "The Green Belt will only be considered for development as a last resort". Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland.	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Cox Dawn	LPPS408	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the District of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000 in Cookley?). It was only by chance I become aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing Allocation Site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated "The Green Belt will only be considered for development as a last resort". Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities.	Housing allocation site WFR/WC/17 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Fisher Elizabeth	LPPS410	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the District of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000 in Cookley?). It was only by chance I become aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing Allocation Site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated "The Green Belt will only be	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							considered for development as a last resort". Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Anderson Susan	LPPS412	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the District of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000 in Cookley?). It was only by chance I become aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing Allocation Site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities.	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated "The Green Belt will only be considered for development as a last resort". Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Osborne Tracy	LPPS414	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the District of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000 in Cookley?). It was only by chance I become aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing Allocation Site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable	Housing allocation Site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district	Yes	Will add to the already stressed road system with no footpaths on the road which is used regularly/daily by ramblers and families.

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							housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated "The Green Belt will only be considered for development as a last resort". Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Egginton Dawn	LPPS416	Policy 36.10		No	No	Justified Effective Consistent with National Policy	We had no notification of this application and when we purchased this property four years ago we were advised by the seller/owner of the proposed field that it would never be built on. The notification of application is a legal requirement. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the	This application should be removed, living in this tiny hamlet is already a hazard when entering and leaving not only my own property but the overuse of this busy road currently. I would also like to point out my property is situated directly on Caunsall Road and the more congested the road becomes the greater concert of the structural damage to my own property but also the bridges.	No	

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							area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated "The Green Belt will only be considered for development as a last resort". Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. the local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed, it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Eddleston David	LPPS423	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the council intended to formally notify all households in the district of the consultation. None of the households on Caunsall and probably all of these in Cookley didn't receive this notification (over 100 in Caunsall and 100? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	Yes	In order to respond in greater detail to the summarised reasons/justifications outlined in paragraph 6 and 7 above.

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							from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered fro on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated 'The Green Belt will only be considered for development as a last resort.' Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterized by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food. 10. Any development would create a physical barrier to a long well established natural wildlife corridor between the Stour Valley and Kinver. 11. The site assessment study contains several inaccuracies which when corrected pain the site in a much less favourable light and unsuitable for the type of housing need identified. 12. Why is it that this good quality, greenfield, Green Belt agricultural land is being sacrificed for just "up to 4 houses". 13. The total provision of 5,500 dwellings is at best an educated guess. Those envisaged for this site make no significant difference to the overall provision whether they are included or not. Housing allocation site WFR/WC37 Caunsall Road, Caunsall DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances of compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan.			
O'Sullivan Ann	LPPS429	Policy 36.10		No	No	Justified Effective Consistent with	I understand as part of the local plan consultation process, the council intended to formally notify all households in the district of the consultation. None of the households on Caunsall and probably all of these in Cookley didn't receive this notification	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						National Policy	(over 100 in Caunsall and 100? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered fro on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated 'The Green Belt will only be considered for development as a last resort.' Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterized by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. this land is a valuable food resource and this will become more so as our ever increasing population demands more food. 10. Any development would create a physical barrier to a long well established natural wildlife corridor between the Stour Valley and Kinver. 11. The site assessment study contains several inaccuracies which when corrected pain the site in a much less favourable light and	contribution to the identified housing needs of the district.		

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							unsuitable for the type of housing need identified. 12. Why is it that this good quality, greenfield, Green Belt agricultural land is being sacrificed for just "up to 4 houses". 13. The total provision of 5,500 dwellings is at best an educated guess. Those envisaged for this site make no significant difference to the overall provision whether they are included or not. Housing allocation site WFR/WC37 Caunsall Road, Caunsall DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances of compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan.			
Ramdin Rebecca	LPPS432	Policy 36.10	No	No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the council intended to formally notify all households in the district of the consultation. None of the households on Caunsall and probably all of these in Cookley didn't receive this notification (over 100 in Caunsall and 100? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered fro on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated 'The Green Belt will only be considered for development as a last resort.' Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							and would be out of character with this part of the hamlet of Caunsall which is characterized by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. this land is a valuable food resource and this will become more so as our ever increasing population demands more food. 10. Any development would create a physical barrier to a long well established natural wildlife corridor between the Stour Valley and Kinver. 11. The site assessment study contains several inaccuracies which when corrected pain the site in a much less favourable light and unsuitable for the type of housing need identified. 12. Why is it that this good quality, greenfield, Green Belt agricultural land is being sacrificed for just "up to 4 houses". 13. The total provision of 5,500 dwellings is at best an educated guess. Those envisaged for this site make no significant difference to the overall provision whether they are included or not. Housing allocation site WFR/WC37 Caunsall Road, Caunsall DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances of compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan.			
Stewardson Christine	LPPS434	Policy 36.10					I understand as part of the local plan consultation process, the council intended to formally notify all households in the district of the consultation. None of the households on Caunsall and probably all of these in Cookley didn't receive this notification (over 100 in Caunsall and 100? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered fro on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated 'The Green Belt will only be considered for development as a last resort.' Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterized by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. this land is a valuable food resource and this will become more so as our ever increasing population demands more food. 10. Any development would create a physical barrier to a long well established natural wildlife corridor between the Stour Valley and Kinver. 11. The site assessment study contains several inaccuracies which when corrected pain the site in a much less favourable light and unsuitable for the type of housing need identified. 12. Why is it that this good quality, greenfield, Green Belt agricultural land is being sacrificed for just "up to 4 houses". 13. The total provision of 5,500 dwellings is at best an educated guess. Those envisaged for this site make no significant difference to the overall provision whether they are included or not. Housing allocation site WFR/WC37 Caunsall Road, Caunsall DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances of compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan.			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 36: RURAL WYRE FOREST

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Stewardson Philip	LPPS437	Policy 36.10	No	No	No	Positively Prepared Justified Effective	The Council claims all local residents in Caunsall were advised of the Consultation. No residents that I have spoken to (in excess of 30 which is half the residents) received notification. I also feel it is not legally compliant because the form designed for objections is misleading and difficult to understand, an example is Q4.1 asking a lay person if a complex matter is legally compliant is intimidating and wrong.	this site needs to be removed from the local plan. The development is not sustainable and the properties that would be built are not what was identified in the local housing needs survey as identified shortage. The officers report is wrong, it states the site is 1 km from local facilities. Cookley is 1.5km, the bus service mentioned is in sever danger of being axed, plus the local shop facilities have reduced with the closing of Cookley post office. More emphasis should be put into Brownfield sites that can provide what local plan identifies.	Yes	Because I feel very strongly about losing Green Belt. This development is wrong and four houses is a token gesture towards housing requirements Wyre Forest has. Once agricultural land is developed its lost forever - this is a valuable resource and population is growing.
Stewardson Mark	LPPS440	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	Yes	Green Belt should be protected. This development is purely going to be about maximum profit. A 2 acre site will be lost for 4 houses.

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							considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Pannell Richard	LPPS443	Policy 36.10	No	No	No	Justified Effective Consistent with National Policy	Housing 3993513/Caunsall WFR/WC/37 This is a locally un-approved plan application not submitted to the local community group. It is on greenfield pasture and an 'infill' which has never been allowed in the area of similar locations. The consideration is a complete change of direction. A village of mostly C19 farm building vernacular would change character significantly with new builds along the main lane.	3993513 WFR/WC/37 New building house are not allowed on infill and greenfield land. Re-buildings in Caunsall have rightly been, allowed on brown sites Rock Tavern, Old Smith but new housing has always bee out of the Local policy framework.	No	
Bishop Jeremy	LPPS447	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Colston John	LPPS451	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Hewitt David	LPPS453	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall,	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Moss Patricia	LPPS455	Policy 36.10		No	No	Justified Effective Consistent with	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no	Yes	this site is valuable Green Belt. Losing it is not good when Kidderminster Town

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						National Policy	100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.	contribution to the identified housing needs of the district.		Centre is dying and the development there would be so much more beneficial and would see the houses that housing needs survey identifies be built.

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Webb Pauline	LPPS458	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Grainger Jennifer	LPPS461	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland.	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Taylor Rebecca	LPPS463	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities.	Housing allocation site WFR/WC.37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Attwood Barbara	LPPS465	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Hill Peter	LPPS478	Policy 36.10	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Wolverley has been designated by the local plan as "washed over" Green Belt. Caunsall has been designed the same. Why therefore has this field in Caunsall been designated as possible development when Caunsall is clearly in the Green Belt.	Wyre Forest Council need comply with NPPF paragraph 136 in regards to the Green Belt and have treated different areas of Green Belt in different ways.	No	
Stubbs Craig	LPPS483	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Colston Diana	LPPS488	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at			

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							any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Morris Raymond F	LPPS491	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Clarke Jeanette	LPPS493	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district		

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Atkin Mel	LPPS497	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 36: RURAL WYRE FOREST

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Robinson Clive	LPPS500	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland.	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Counsell Brett	LPPS502	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing.	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Thompson Amelia	LPPS505	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road.	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Young Robert	LPPS507	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time.			

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Vanes S	LPPS509	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW. With regard to NPPF guidelines, I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable greenfield, Green Belt agricultural land for housing. 6. The Council leader has stated 'The Green Belt will only be considered for development as a last resort'. Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities.	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by swellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Pannell Carole	LPPS531	Policy 36.10	No	No	No		4.1 Legal compliance Para 006 Ref ID 12-006-2015 0310 has not been tailored to needs of area, particularly infrastructure, accessibility and transport choice. Unsustainable development. 4.2 Not sound, good agricultural land; Green Belt; wildlife corridor from Kinver to the Stour Valley. 4.3 No informed about application for planning - didn't even tell neighbours who would be most affected - reprehensible behaviour. 4.1 No guarantee of additional infrastructure to cope with 1,400 houses. Schools, medical facilities, shops and employment are required for this to be sustainable. Cookley school, surgery and shops cannot support an extra 1,400 families. Public transport is limited and of poor quality It is likely that the majoring of homeowners would travel to the West Midlands conurbation for work, especially Birmingham, and current road systems cannot sustain this - 1,400 homes means 2,000 more cars on the road at a conservative estimate. Affordable housing - where will owners work, and how will they get there? How will they have 'affordable' lives?	Outline planning approval for building should be dismissed, and this area of Green Belt and wildlife corridor should be protected. Also this is natural posture land. Out of character with ethos of village and supporting 'greed'. Building on this land will contribute to the traffic on this road, adding to congestion in Cookley village, wear and tear on bridges, and increase of dangers at the junction of the A449. LA have insufficient funds to maintain infrastructure. The infrastructure necessary to support a "village" has to be in place in the first phase of building. Green and wooded spaces need to be preserved to combat the increased emissions in the area in order to comply with world climate change directives. Build a sustainable, eco-village, with 'passive' houses, solar roves, solar farm, and wind energy. Build for the future choose sustainable eco-architects and builders not greedy developers.	No	
Templeton Shan	LPPS405	Policy 36.10		No	No	Justified Effective	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the District	Housing allocation site WFR/WC/37 needs to be removed from the local plan	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
						Consistent with National Policy	of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000 in Cookley?). It was only by chance I become aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing Allocation Site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated "The Green Belt will only be considered for development as a last resort". Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. Once agricultural land is developed it is lost forever. This land is a	as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the District.		

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							valuable food resource and this will become more so as our ever increasing population demands more food.			
Clarke Simon	LPPS407	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the District of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000 in Cookley?). It was only by chance I become aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing Allocation Site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated "The Green Belt will only be considered for development as a last resort". Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make on contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Hewitt Wendy	LPPS409	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the District of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000 in Cookley?). It was only by chance I become aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing Allocation Site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated "The Green Belt will only be considered for development as a last resort". Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							and would be out of character with this part of the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Fisher John	LPPS411	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the District of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000 in Cookley?). It was only by chance I become aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing Allocation Site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated "The Green Belt will only be considered for development as a last resort". Why include this valuable agricultural land when there are enough small infill sites	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Merrall Richard	LPPS413	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the District of the consultation. None of the households in Caunsall and probably all of those in Cookley received this notification (over 100 in Caunsall and 1000 in Cookley?). It was only by chance I become aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing Allocation Site WFR/WC/37 Caunsall Road, Caunsall, DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated "The Green Belt will only be considered for development as a last resort". Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. Once agricultural land is developed it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Powderhill Leslie	LPPS415	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the Council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of these in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I became away of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. Housing allocation site WFR/WC/37 Caunsall Road, Caunsall DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances or compelling reasons why this Green Belt, greenfield, agricultural land needs to be included in the local plan. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable and the location would	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered for on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated "The Green Belt will only be considered for development as a last resort". Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. the local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed, it is lost forever. This land is a valuable food resource and this will become more so as our ever increasing population demands more food.			
Eddleston Marlene	LPPS421	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the council intended to formally notify all households in the district of the consultation. None of the households on Caunsall and probably all of these in Cookley didn't receive this notification (over 100 in Caunsall and 100? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings.	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
							4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered fro on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated 'The Green Belt will only be considered for development as a last resort.' Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt and would be out of character with this part of the hamlet of Caunsall which is characterized by dwellings eparated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. this land is a valuable food resource and this will become more so as our ever increasing population demands more food. 10. Any development would create a physical barrier to a long well established natural wildlife corridor between the Stour Valley and Kinver. 11. the site assessment study contains several inaccuracies which when corrected pain the site in a much less favourable light and unsuitable for the type of housing need identified. 12. Why is it that this good quality, greenfield, Green Belt agricultural land is being sacrificed for just "up to 4 houses". 13. The total provision of 5,500 dwellings is at best an educated guess. Those envisaged for this site make no significant difference to the overall provision whether they are included or not. Housing allocation site WFR/WC37 Caunsall Road, Caunsall DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances of compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan.			

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 36: RURAL WYRE FOREST

Respondent	Response No.	Part of Document	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Taylor Deirdre	LPPS428	Policy 36.10		No	No	Justified Effective Consistent with National Policy	1. I understand as part of the local plan consultation process, the council intended to formally notify all households in the district of the consultation. None of the households in Caunsall and probably all of these in Cookley received this notification (over 100 in Caunsall and 1000? in Cookley). It was only by chance I become aware of it. How can residential respond to a document they are unaware of? I therefore consider the council has failed in its body to cooperate. 2. Housing allocation site WFR/WC/37 Caunsall Road DY11 5YW With regard to NPPF guidelines, I am unaware of any exception circumstances or compelling reasons why this Green Belt land needs to be included in the local plan.	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	
Morris Irene	LPPS430	Policy 36.10		No	No	Justified Effective Consistent with National Policy	I understand as part of the local plan consultation process, the council intended to formally notify all households in the district of the consultation. None of the households on Caunsall and probably all of these in Cookley didn't receive this notification (over 100 in Caunsall and 100? in Cookley). It was only by chance I became aware of it!! How can residents respond to a document they are unaware of? I therefore consider the Council has failed in its duty to co-operate. 1. Green Belt land should not be considered until all brownfield sites have been developed. No allowance is made in the local plan for other brownfield sites which will inevitably come on stream during the plan period negating the need to include small sites like Caunsall Road. 2. Development of this site will set a very dangerous precedent putting pressure on similar Green Belt land, leading to further erosion of the Green Belt. 3. The local housing needs survey identifies a need for affordable housing and elderly persons dwellings. 4. Affordable housing would not be viable, and the location would not be suitable for elderly persons dwellings. Over the years elderly residents of Caunsall have tended to move away from the area to be closer to local amenities. 5. The housing need north of Kidderminster would be more than catered fro on the major development at Lea Castle and there is therefore no need to sacrifice this valuable green field, Green Belt agricultural land for housing. 6. The council leader has stated 'The Green Belt will only be considered for development as a last resort.' Why include this valuable agricultural land when there are enough small infill sites in the built up area of Cookley able to absorb the small number of dwellings that are proposed for this site and are close to all the village facilities/amenities. 7. Development, as envisaged in the local plan, i.e. along the road frontage would be detrimental to the openness of the Green Belt	Housing allocation site WFR/WC/37 needs to be removed from the local plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the district.	No	

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							and would be out of character with this part of the hamlet of Caunsall which is characterized by dwellings separated by open fields, hedgerows and areas of woodland. 8. The development would not be sustainable being located 1.5km from the nearest local facilities in Cookley, necessitating travel by car creating extra traffic and pollution on local roads. Pedestrian facilities along sections of the routes are poor. The local bus service to Kidderminster is under threat and could be withdrawn at any time. 9. Once agricultural land is developed it is lost forever. this land is a valuable food resource and this will become more so as our ever increasing population demands more food. 10. Any development would create a physical barrier to a long well established natural wildlife corridor between the Stour Valley and Kinver. 11. The site assessment study contains several inaccuracies which when corrected pain the site in a much less favourable light and unsuitable for the type of housing need identified. 12. Why is it that this good quality, greenfield, Green Belt agricultural land is being sacrificed for just "up to 4 houses". 13. The total provision of 5,500 dwellings is at best an educated guess. Those envisaged for this site make no significant difference to the overall provision whether they are included or not. Housing allocation site WFR/WC37 Caunsall Road, Caunsall DY11 5YW with regard to NPPF guidelines I am unaware of any exceptional circumstances of compelling reasons why this Green Belt, greenfield agricultural land needs to be included in the local plan.			
Campaign to Protect Rural England	LPPS523	Policy 36.6	No	No	Yes	Positively Prepared Justified Consistent with National Policy	Despite this being an objection we welcome the principle of the proposal, but what appears should be augmented (as in 7 below). Additionally HELAA site WFR/CB/3 should be safeguarded to provide additional land for car parking if necessary, as there is a grave death of Park and Ride Car Parking along the Kidderminster- Stourbridge-Birmingham line - One object of this is to seek to reduce traffic on A456 though Hagley.	Add: 4. Highway access should be from Lynwood Drive. 5. Pedestrian access from the site should be available direct to Station Drive (not via Lynwood Drive) - to make it as easy to use as possible. 6. Parking should be free - so that the car park can complete with that at Stourbridge Junction. The rail operator should recover the cost through ticket sales.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Wlliams Richard	LPPS19	36.1	No	No	Yes		Planning for local need is lacking in detail. Retirement homes for older residents would free up housing for other local community members to find homes. Settlement boundary for Far Forest would need to be extended		Yes	This process is so difficult to navigate. Verbal participation always better

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							to allow for the above. Infrastructure needs major investment. School places limited School transport costs Public transport improvements required			
Hodgkiss Nick	LPPS190	Policy 36.1 Lem Hill Nurseries, Far Forest	No	No	No	Positively Prepared Justified	The summary sentence is misleading. The existing site has not been developed in the sense of permanent structures but rather has been used as a plantsman's site for poly tunnels and for raising plant for sale to the trade and in the adjacent nursery. As such it has remained virtually unspoiled green space. The existing local "facilities" are very much overstated and totally under-researched. 1) The Far Forest village shop is a Corner Shop only and is used only as a "top-up" facility. Main shopping is by car to other towns and villages. A further 20 dwellings will add to the local traffic and pollution. 2) The local pub is no longer a pub but is entirely made over as a carvery restaurant and offers only extremely limited bar facilities. 3) The local church is part-time with a vicar who spreads his attendance across three parishes. 4)The primary school takes pupils from a very wide geographic area/ radius and is not automatically for locals. Contrary to the summary sentence, there are ecological issues which have been disregarded. It has only been assumed that there are none because there has been no substantive survey. The established hedgerows are a home to many species. There are bats evident to my knowledge in this area. The light pollution from the development would also pose a significant threat to our dark skies and more houses pose more potential uncontrolled pollution and disruption to the adjacent stream and to the Wyre Forest/Ranters Bank SSSI nearby. The site is at the very western edge of the Wyre Forest District and is separated from, indeed outside, the Far Forest village Settlement Area leading to a possibility of undesirable infill development in the future. Public transport facilities are very basic with no bus stop close. Twenty new dwellings equate to some 40 vehicles likely to be negotiating access to the busy A4117 Cleobury Road on at least a twice-daily basis. This will pose a significant highways concern.		No	

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							I am unable to find a public document for the "Rock Parish Housing Needs Survey" suggesting the need for 20 houses but it is unlikely that such a development would sell to locals in any event. There are already 40% of the residents travelling away for employment and the development will simply provide these dwellings for a commuter population making the village even more of a "Dormitory".			
Holmes	LPPS70	36.4	No	No	No	Justified	16 dwellings is excessive for a village of less than 740 people. New housing attracts new families who then displace local home seekers so forming a new dormitory rather than community. Infrastructure such as roads (dangerous cross road) and drainage are unable to support such development. Consideration should be given for social housing and self build to assist the natural expansion of the community.	Reduce the number of dwellings to cater for local needs with social housing and self build.	No	
Bews Jean	LPPS72	36.4 Site ref WA/UA/1	Yes	No	Yes	Justified	1. The site plan encloses land, and has a proposed access, which is not owned by the Appellant, but by the Village Hall Trust, which has not given permission. Local residents do not want to lose our village hall. 2. The site is full of knotweed, which is rampant. Local residents have brought this to the notice of the landowner, the police and local councillors, as it is an offence to leave it uncontrolled and takes years to eliminate. 3 The sewage pipes to six houses (1to 6 Kinver View) runs under this land and joins the main sewer in the A442 at the bottom corner of the site and this needs to be taken into account. 4. Access onto this site will increase traffic hazards at the crossroads...where traffic meets from five directions. The A442 itself is a dangerous road full of heavy goods traffic. 5. We question whether this is the right site for housing need as, whenever houses here along the A442 come up for sale or rent, they are very slow to sell or be rented out, and then rarely to local people, although rents and sales are probably no more than the proposed properties would be. These comments are submitted by myself and also on behalf of other residents of Kinver View, after discussions.	This site does not appear suitable for many reasons. A site nearer to Shatterford Estate in Arley Lane may be more acceptable to local people and it would be away from the dangers of the crossroads.	No	
Holmes	LPPS54	36.4	No	No	No		Need for additional housing in this area is unproven. Multiple issues exist with existing roads. This represents an unreasonable incursion into the Green Belt. Surface water issues.	Remove this development as it only serves to encourage over development and fails to consider local needs for social housing and road safety.	No	
Holmes	LPPS51	36.5	No	No	No		Need for additional housing in this area is unproven. Multiple issues exist with existing roads. This represents an unreasonable incursion into the Green Belt.	Remove this development as it only serves to encourage over development and fails to consider local needs for social housing and road safety.		
Holmes	LPPS71	36.7	No	No	No	Justified	This is "ribbon development" with four house already existing	Remove this proposal.		

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							and contrary to Green Belt policy. This prominent location on the A442 trunk road would be an unacceptable blot on the natural countryside in the prominent location at the Worc/Shropshire county boundary. The site is described as a car park but in fact was part of the PH gardens used as an occasional "boules" court. The cross roads have very poor visibility on to the A442 and the normal visibility splay standards to the Shropshire side cannot be achieved. Surface water drainage causes significant issues with water spillage into Lion Lane. The restricted site area and clay subsoil will prevent septic tank/biodisc foul drainage.			
Holmes	LPPS53	36.7	No	No	No		Need for additional housing in this area is unproven. Multiple issues exist with existing roads. This represents an unreasonable incursion into the Green Belt and ribbon development. Services are lacking and a serious issue exist with surface water drainage onto Lion Lane. Insufficient space for foul drainage provision.	Remove this development as it only serves to encourage over development and fails to consider local needs for social housing and road safety. Inadequate services.	No	
Tilly Jane	LPPS114	36.16; WFR/WC/37		No	No	Justified Consistent with National Policy	I believe this aspect of the plan is unsound based on the following: The site is on Green Belt land and I am unaware of any exceptional circumstances or compelling reasons why this site needs to be included in the Local Plan. Its Green Belt status should safeguard it from encroachment. Development of the field, as envisaged in the Local Plan, would be detrimental to the openness of the Green Belt. It would remove a valuable piece of agricultural land, wildlife corridor and would be out of character with this part of the hamlet of Caunsall, which is characterised by dwellings separated by open fields, hedgerows and areas of woodland. It would set a very dangerous precedent, putting pressure on similar Green Belt land, leading to further encroachment and erosion of the Green Belt. The Council leader has stated that Green Belt land will only be developed as a last resort. No allowance has been made for other brownfield sites that will inevitably become available during the period covered by Local Plan, negating the need to develop this Green Belt site for the small number of dwellings proposed. The Wyre Forest Housing Needs Study (2018) identifies a need for affordable housing and elderly persons' dwellings. Affordable housing would not be viable and the location would not be suitable for elderly persons' dwellings. The development is located 1.5km from the nearest local facilities in Cookley, pedestrian facilities along sections of the route are poor and the	Site WFR/WC/37 needs to be removed from the Local Plan as the development would be unsustainable, unnecessary and make no contribution to the identified housing needs of the District.	No	

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							local bus service to Kidderminster is under threat. I also understand that, as part of the consultation process, the Council intended to notify all households in the District of the consultation. I believe that none of the households in Caunsall received this notification. I live in the District and also did not receive any postal correspondence relating to the consultation.			
Petition on Behalf of Far Forest Villagers and surrounding areas	LPPS834	36.18 Amendment to settlement boundaries	Yes	No	Yes		36 Rural Wyre Forest - Land Adjacent to Tolland Bungalow, Plough Lane. (Petition 70 signatures) We are aware that this land is **NOT** highlighted on the WFDC Plan however this land is now identified within the recently revised Village boundary and would be identified as "in Fill" and is still a site of interest for potential building by the Wyre Forest District planning. Previous indicated for up to 5 houses. **BR-R0-4** As villagers we were only aware of the continued interest of this land following attendance to the Consultation Meeting in Bewdley on 27th Nov 2018. The reasons for our objections to any development on this plot of land are as follows: • The site identified for this purpose as *Plough lane site* backs onto and links to other land also identified as a preferred site/site of interest and also not highlighted in the Wyre Forest This being land being known as Orchard House. We believe any development on the Plough Lane Site will put at risk the viability of this area regarding its trees and hedgerow/wild space untouched for decades and a place of natural habitat. Any development here will affect quite natural area of trees, ancient hedgerows and grassland which it contains and is known to support and sustain wildlife due to its location. The area is known to assist in sustain rare species including adder, butterfly, moths, insects and bats. It is also well known to be an area to support native deer. This particular type of wild free space is rare and as such is know to be a place for natural wildlife conservation and the areas ecology. **Please see:** Worcestershire County Council Title:-Addendum (2) to preliminary ecological appraisal of potentially ecologically sensitive sites on WFDC's list of sites for allocation in 2018 Local Plan Sites in the addendum BR/RO 4-6. This was conducted by Severn CAP - Natural & Historical Environment Consultancy. *Wildlife Conservation and ecology* - A unique place to live 11.29,Protecting and enhancing Policy 11 D p.g 80, p.g 85 A Unique place to live 11 B, 11.3 section 3 i,ii,iii,iv,v p.g 80-81,	We object to any development and do not understand why we are not within the Green Belt but only classed as countryside outside of this in the WFDC Local Plan Preferred Options Key Diagram. None of what we feel to be as the most important element of this part of the county and nationally, where it is renowned for is beauty, rare animals, plants, fauna and flora. The Wyre Forest and its surrounding meadows and fields and open space is included in the WFDC Green Belt. This is a shock. We feel overall that any building in this area will negatively impact on this locally important environment, its character within the area and threaten the village / rare meadows / fields in any future planning applications.	No	

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							Historic Environment B ii,ix p.g 77, 8 Rural Exception Sites iii p.g 94, Strategic Green Infrastructure B iii p.g 94, Infill Policy 188 a desirable place to live, ii 18.8.18.9 18.10 p.g 112 p.g113, Sustainable Tourism 23 p.137-144 Habitats regulations(HRA) screening requirement 1.4 • We believe that any development on this site would mean a change in skyline, as all the buildings along this stretch are bungalows. The land is virgin land as it has had no buildings on it in its life time. So any new buildings here would encroach on the current residents. Also since the initial consultation last year, it has been noted that the boundary to Far Forest Village has now been redrawn and clarified. We do not however feel that using this land now under 'Fill In" is appropriate for the Village. • We object to any houses on this land not only for wildlife reasons as mentioned but the introduced light pollution that additional houses will include. As a village we wish to maintain its dark skies where possible. We know we are very lucky in this village to be able to stand in our gardens and see the stars and light pollution in this village is very low. The dark skies have always been part of our village life and important to its character. We feel it is important to state that this is an important area to maintain and not develop due to its significant moth and bat populations for which the area is renowned. It also assists other night time animals/birds. *Change of character and landscape to the area* - Desirable place to live ii/iii p.g 55-56, Infill policy 188, Quality and Design and Local distinctiveness 27 p.g 154-164 • The Village already has had years of sewage issues/storm drain/flooding issues. Concerns are raised by villagers over the effect further houses will have. The recent upgrade of the sewage system in the village servicing many houses in the village, is currently only big enough for existing properties as per agreed plan. It is a concern that any additional sewage need in the village will have a negative effect overall due to additional pressure both the sewage and storm drain system. Utilities- Sewage Systems and water Quality Policy 158 - section iii and section 15 p.g 97 15C - Flood Risk Management p.g 98 150 Sustainable Drainage Systems P.g 100.			

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							A desirable place to live - section 8 policy BC point ii-iii p.g 55-56 Rural Development 28 Policy 288 p.g 97 and P.g 100. • We have strong concerns about any development on Plough Lane, due to any exit from this area which would mean coming out directly onto the A4117 (Cleobury Road), This is a busy and well used road. Concerns relating to this are; o High risk of accident to pedestrians /drivers. o The current Bus Stop is at "The Plough Public House" right opposite Plough Any vehicle parked here for any time reduces vision and safety on the road at this point. o There is also a busy shop and car park entrance a few yards from Plough Lane and this is a danger hotspot. Already drivers and pedestrians have to negotiate delivery lorries parked by the shop or the pub as they make deliveries. o We anticipate that a junction would need to be created here for safety reasons due to increase usage and on doing so this would greatly change the character of this part of the village. *Traffic-Transport* and accessibility in Wyre Forest p.g 85 Transport/Roads policy 13 managing travel demand Ai,ii,ii and B, Highways Network 13.12 p.g 88-89, Policy 16 - pollution and land instability 16.2 Policy 18 E p.g 114, Rural Development 28- policy 288 p.g 169 We feel the Local Plan is unsound; Overall any building or development here will automatically affect the sensitive ecological environment here and would contravene the completed survey and report undertaken on behalf of Worcestershire County Council - Title:- Addendum (2) to preliminary ecological appraisal of potentially ecologically sensitive sites on WFDC's list of sites for allocation in 2018 Local Plan Sites in the addendum BR/RO 4-6. This was conducted by Severn CAP - Natural & Historical Environment Consultancy. We do not feel that this plan is sound, as it clearly threatens the sensitive and fragile ecological system in this area. It is felt that the WFDC Planning has been conflicting overall in the information provided to the public in this process to date. It has made it difficult for us as individuals to be clear on what the council is proposing in their plan related to our village. It has			

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							changed its plans or has contradicted itself. This was land deemed unsuitable for development and was also outside the village boundary at one point even though it was identified as a preferred site. It is now within the village boundary and still a site of interest in the plan as it enables access to BR-R0-6. In the beginning there was lots of reference to the village and its boundary. But when people asked what this was, no-one in the District Council could be clear on what this was or looked like. Now we do have a clear devised. And as such this land adjacent to Tolland are within this along with BR-R0-6! There seems to be lots of assumptions made by the Wyre Forest District Council about the provision of our village, *the hierarchy scoring system* is clearly not up to date or it has been misinformed, as our information in our petition clarifies. This also goes to the fact we were scored higher on villagers having services such as Doctors and Dentist within a nearer distance than Bewdley i.e. access in Cleobury Mortimer. It is just over 4 miles from Far Forest to Cleobury Mortimer and these services are in Shropshire and not Worcestershire. This also does not mean that we will be accepted as clientele there which was alluded to at a recent consultation meeting. We are in fact nearer from Far Forest to Bewdley, which is in Worcestershire, 4 miles away and towards which we pay our council tax. We do not feel that the scoring system used is sound due to incorrect data. Sewage and flooding is a regular occurrence in the village. The Village has had a long history of storm drains issue, sewage and water run off. We do not feel the building plan is sound due to its safety or suitability for such a sensitive area and SSSI sites within easy reach and ease of pollution, including light pollution.			
Limbrey Susan	LPPS892	36.18		No		Justified Consistent with National Policy	Under Policy 36.18, infill plots can come forward to '*help maintain village services'*. Far Forest's services are very strongly supported by the high volume of passing traffic (A4117 is not classified as a major route, but it carries more traffic than A456 west of their junction, and the shop here is the only place commercial drivers can stop to buy snacks without finding and paying for parking in a very long distance), by customers to the pub/restaurant from far afield, by the high population of the village hinterland of smallholdings and cottages, by walkers and cyclists, and touring caravans, and by the more than 300 static	Re-drawing of Far Forest village boundary to exclude Land Adjacent to Tolland Bungalow.	No	

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							caravans within 2km of the village, the majority of whose occupants have no other home. (WFDC holds that 11 month occupancy is not residential. This is not true!)			
Petition on Behalf of Far Forest Villagers and surrounding areas	LPPS838	Paragraph 36.18 - Settlement Boundary	Yes	No	Yes		(Petition 72 signatures) 36 Rural Wyre Forest - Orchard House site **(NOT** highlighted on this plan now but it is known that this is still a 'site of interest' for potential building in the Wyre Forest District plan. It has is now been identified to be within the revised village boundary and will be highlighted as 'land for 'In Fill") Previously indicated for up to 15 houses. **BR-R0-6** The reasons for our objections to any development on this land are as follows; • The site identified at Orchard House backs onto and links to other land also identified as a preferred site of interest and not highlighted in the This being land next to Tolland / The Sycamores on Plough lane (BR-R0-4).We believe any development on the Orchard House site will put at risk the viability of this area regarding its trees and hedgerow/wild space untouched for decades and a place of natural habitat. Any development here will affect quite natural area of trees, ancient hedgerows and grassland, which is known to support and sustain wildlife due to its location. **Please see:** Worcestershire County Council Title:- Addendum (2) to preliminary ecological appraisal of potentially ecologically sensitive sites on WFDC's list of sites for allocation in 2018 Local Plan Sites in the addendum BR/RO 4-6. This was conducted by Severn CAP - Natural & Historical Environment Consultancy. The area in which Orchard House resides (as the name implies as it was an old orchard) is known to assist in sustain rare species including adder, butterfly, moths, insects and bats. It is also well known to be an area to support native deer. This type of wild free space is rare and as such is know to be a place for natural wildlife conservation and the areas ecology. *Wildlife Conservation and ecology –* A unique place to live 11.29,Protecting and enhancing Policy 11 D p.g 80, p.g 85	We object to any development and do not understand why we are not within the Green Belt but only classed as countryside outside of this in the WFDC Local Plan Preferred Options Key Diagram. None of what we feel to be as the most important element of this part of the county and nationally, where it is renowned for is beauty, rare animals, plants, fauna and flora. The Wyre Forest and its surrounding meadows and fields and open space is included in the WFDC Green Belt. This is a shock. We feel overall that any building in this area will negatively impact on this locally important environment, its character within the area and threaten the village / rare meadows / fields in any future planning applications.	No	

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							A Unique place to live 118, 11.3 section 3 i,ii,iii,iv,v p.g 80-81, Historic Environment B ii,ix p.g 77, 8 Rural Exception Sites iii p.g 94, Strategic Green Infrastructure B iii p.g 94, Habitats regulations(HRA) screening requirement 1.4 • We believe that any development to this site would mean a change in skyline, as all the buildings along this stretch are bungalows. The Orchard house is the exception but this does not overlook any of these properties. So any new building could encroach on the current residents. Since the initial consultation last year, it has been noted that the boundary to Far Forest Village has now been redrawn and clarified. We do not however feel that using this land now under 'Fill In" is appropriate for the Village. • We object to additional lighting, which further houses will introduce, as the Village wishes to maintain its Dark Skies where possible. We know we are very lucky in this village to be able to stand in our gardens and see the stars. Light pollution in this village is very low. It is important to note that this is an important to the area due to its significant moth and bat populations for which the area is renowned. It also assist other night time animals/birds. The dark skies have always been part of our village life and important to its character. Desirable place to live ii/iii p.g 55-56, Infill policy 188, Quality and Design and Local distinctiveness 27 p.g 154-164 • Any developments made will affect existing properties as it is known that number of properties along theA4117 are not on the main sewage system. They have septic tanks which are situated in the proposed site land. The recent upgrade of the sewage system in the village servicing houses of on the sewage system from Cleobury Road to the properties along the bottom of New road, it is only to only big enough for existing properties as per agreed plan. The Village has already had years of sewage issues/storm drain/flooding issues. Concerns are raised by villagers over effect further houses will have. Utilities- Sewage Systems and water Quality Policy 158 - section iii and section 15 p.g 97 15C - Flood Risk Management p.g 98 150 Sustainable Drainage Systems P.g 100 A desirable place to live - section 8 policy BC point ii-iii			

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							p.g 55-56 Rural Development 28 Policy 288 p.g 97 and P.g 100. • We have strong concerns about any development on the Orchard House Site/ adjoining site next to Tolland on Plough Lane, due to any exit from this area would mean coming out onto the A4117 (Cleobury Road), which is a busy and well used road. Any exit would need negotiate either direct onto the A4117 or a join Plough which is across from the Plough lane exit. Concerns relating to this are; o High risk of accident to pedestrian/driver. o The current Bus Stop is at The Plough, reducing vision and safety on the road at this point. o There is a busy shop and its car park is between Orchard House (and Plough Lane). Again a danger hotspot. o Any potential entrances will be close to a busy car park for the local Here drivers and pedestrians have to negotiate delivery lorries parked by the shop or the pub as they make deliveries. o There is also a busy and well used Baptist church with only parking for 2 cars, plus numerous drives to residential buildings along that stretch of road o We anticipate that a junction would need to be created here for safety reasons and on doing so this would greatly change the character of this part of the village. Traffic-Transport and accessibility in Wyre Forest p.g 85 Transport/Roads policy 13 managing travel demand Ai,ii,ii and 8, Highways Network 13.12 p.g 88-89, Policy 16 - pollution and land instability 16.2 Policy 18 E p.g 114, Rural Development 28- policy 288 p.g 169 We feel the Local Plan is unsound; Overall as this land is joined to plot BR-R0-4 ,any building or development here will automatically effect the sensitive ecological environment there and would contravene the completed survey and report undertaken on behalf of Worcestershire County Council - Title:- Addendum (2) to preliminary ecological appraisal of potentially ecologically sensitive sites on WFDC's list of sites for allocation in 2018 Local Plan Sites in the addendum BR/RO 4-6. This was conducted by Severn CAP - Natural & Historical Environment Consultancy. We do not feel that this plan is sound, as it clearly threatens the			

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							sensitive and fragile ecological system in this area. It is felt that the WFDC Planning has been conflicting overall in the information provided to the public in this process to date. It has made it difficult for us as individuals to be clear on what the council is proposing in their plan related to our village. it has changed its plans or has contradicted itself. This was land deemed outside the village boundary at one point and was not to be accepted as building land following the initial consultation plan, even though it was identified as a preferred site, as highlighted in the 2017 consultation plan, but now it is as it is within the village boundary! In the beginning there was lots of reference to the village and its boundary. But when people asked what this was, no-one in the District Council could be clear on what this was or looked like. Now we do and as such Orchard House and the land adjacent to Tolland are within this! There seems to be a lot of assumptions made by the Wyre Forest District Council about the provision of our village, *the hierarchy scoring system* is clearly not up to date or it has been misinformed, as our information in our petition clarifies. This also goes to the fact we were scored higher on villagers having services such as Doctors and Dentist within a nearer distance than Bewdley i.e. access in Cleobury Mortimer. It is just over 4 miles from Far Forest to Cleobury Mortimer and these services are in Shropshire and not Worcestershire. This also does not mean that we will be accepted as clientele there which was alluded to at a recent consultation meeting. We are in fact nearer from Far Forest to Bewdley, which is in Worcestershire, 4 miles away and towards which we pay our council tax. We do not feel that the scoring system used is sound due to incorrect data. Sewage and flooding is a regular occurrence in the village. The Village has had a long history of storm drains issue, sewage and water run off. We do not feel the building plan is sound due to its safety or suitability for such a sensitive area and SSSI sites within easy reach and ease of pollution, including light pollution.			
Pickett David and Mrs Marjorie	LPPS898	Policy 36.18		No		Justified Consistent with National Policy	The objections are centred around Policy 36 'Villages and Rural Areas Site Allocations' and the re-drawing of the defined settlement boundary for Far Forest. Policy 36.1 'Lem Hill Nurseries' (BR/RO/2) seeks to allocate 20 residential units in Far Forest off the A4117. The reason for this allocation is outlined in the reasoned justification as *'Far Forest is a well-served village with a primary school, shop, public house and churches'*. There is no objection in principle to this allocation. However, this allocation forms an integral component to our strong objections to the Council's decision to re-draw the	In order for the Local Plan to be made sound, the Council should revert the settlement boundary for Far Forest as per the previous Development Plan Core Strategy (2010). As outlined in question 6, there is no justified evidence to re-draw the settlement boundary and any such revision would not be in accordance with	No	

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							settlement boundary to accommodate further infill residential development in the village. It is important to consider that as part of the Local Plan Review Preferred Options (2017), an allocation for residential development on land adjacent Tolland (Ref. BR/RO/4/6) was ruled out by the Council. The Officers comments for this were outlined as: *"The decision has been taken not to allocate these sites through this Local Plan. Further ecological assessment has been undertaken and the final report is awaited. If when the housing needs survey for Rock Parish is updated a requirement is found that cannot be accommodated elsewhere, these sites may need to be reconsidered. Only very limited development would be allowed with the potential to develop the orchard further for the benefit of the wider community".* A Preliminary Ecological Appraisal was subsequently carried out on this site on 5 October 2018. A copy of which can be found by the following link http://www.wyreforestdc.gov.uk/media/3991996/ADDENDUM-2-to-Ecology-Appraisal-of- WFDC-sites-for-allocation.pdf. The site was identified as a potential area for ecological value due to its proximity to Wyre Forest SSSI and possible species-rich grassland. The conclusions of this appraisal stated that: *"The presence and positions of ancient fruit trees and tree lines on two boundaries restricts developable area and layout. Due to the nature and configuration of the ecological constraints we caution that WFDC consider removing this site from allocation in its entirety".* The appraisal identified the following: *Features of biodiversity significance* • *Cherry trees showing some features of ancient trees (e.g. hollowing trunk, cavities and very rough and creviced bark), with a high likelihood of supporting the noble chafer beetle and potential to host roosting bats.* • *Mature trees on the southern (road-side) and eastern boundaries are important corridors at a landscape level.*	National planning policy. If you have any questions, please do not hesitate to contact me.		

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							<u>*Recommendations*</u> • *The ancient fruit trees must be retained (NPPF 18 paragraph 175c: development resulting in the loss or deterioration of irreplaceable habitats [such as ancient woodland and ancient or veteran trees] should be refused, unless there are wholly exceptional reasons…). The locations of the trees would make it very difficult to develop this site without removing or at least causing their deterioration.* It is therefore clear why this site was removed as an allocation, as there are significant constraints, which could impact negatively upon any planning application for new residential development. Notwithstanding this, the Council has sought to re-draw the defined settlement boundary in Far Forest to include the land advanced as a residential allocation. This would allow an infill development of up to 6 units in line with paragraph 36.18 of Policy 36. The Council's justification for re-drawing the settlement boundary in Far Forest is outlined in paragraph 36.18, which states that *"Development on Non-allocated plots in villages outside the Green Belt…To the west of the River Severn in villages and settlements outside the Green Belt, there is the potential to bring forward small infill plots for up to 6 dwellings. These plots can come forward under Policy 18B. Amendments have been made to settlement boundaries in a number of villages in Rock Parish to enable small sites to be brought forward for development. This will allow for limited development to help retain village services. Revised settlement boundaries are shown on the Policies Map. Any development will need to be carefully designed to reflect the characteristics of the settlement and take account of any existing constraints such as flooding, drainage, ecology and landscape".* The below images show the original settlement boundary (left) and revised boundary (right) As can been seen, the settlement boundary has been extended significantly to include land to the north, where vehicular access can only be provided off Plough Lane. The justification for re-drawing the settlement boundary in Far Forest is to allow new infill residential development for up to 6 residential units. By re-drawing the settlement boundary, the			

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							Council are effectively promoting the former de-allocated site for new residential development, which would likely cause significant harm to the important ecological features on the site. This would go against national planning policy as contained within the updated Framework (paras 174-175). There are also significant concerns over the justification to re-draw the settlement boundary in Far Forest in terms of the evidence base used by the Council. As part of the Local Plan Review, the Council produced a 'Settlement Hierarchy Technical Paper' (October 2018). The aim of the paper is to *"set out the background to the settlements within the District and provides a recommendation as to a suitable settlement hierarchy for use in the District's Local Plan. The paper reviews the services and facilities which are currently available within the settlements across the District. The evidence presented here demonstrates that the Settlement Hierarchy is the most suitable for accommodating the growth for the District…"*. The paper makes reference to Far Forest stating that *"This settlement is also located to the west of the District. Far Forest contains a number of facilities. The settlement has a convenience store including a Post Office, a Primary School, a Public House and a Village Hall. These facilities all provide important roles within the settlement and ensure that there remains an element of self-sufficiency. However, the settlement still relies on higher-order centres for a large number of services and facilities. Given the location and accessibility of the area it is not considered to be a suitable location to prioritise new development, aside from potentially catering for any identified local need"* . *(My emphasis)* The last sentence in the paper clearly outlines that there is no justifiable evidence to prioritise new residential development in this area. Notwithstanding this, an allocation of 20 units has been identified by the Council along with a new revised settlement boundary, which could accommodate up to a further 12 units on two infill sites (e.g. Orchard House and Plough Lane). This could amount to a total of at least 32 new dwellings in a location that is not considered to have good accessibility to higher order centres. This goes against the evidence contained in this paper. At the very least, if the allocation at 'Lem Hill Nurseries' is considered sound; then there is no evidence to suggest that the settlement boundary for Far Forest requires amending to accommodate further sites for residential development. There is no evidence to justify why further residential development is			

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							required in this village. Looking at the Individual Settlement Analysis (Appendix A) of the paper, it is clear that Far Forest is in the bottom 4 (out of 15) locations in the District in terms accessibility to services such as a Post Office; G.P; Public House; Dentists; Convenience Store; Bus services frequency and destination; Primary School; Secondary School; Public Hall; Employment Opportunities and Railway Station. One of the villages identified as being similar to Far Forest (i.e. Clows Top) in terms of accessibility does not include any revisions to their settlement boundaries to accommodate further infill development. This village is also not subject to any allocations for new residential development. It should therefore follow that in order to help retain the village facilities (as promoted by the Council in para 36.18) of Clows Top, then small infill residential developments would be appropriate in this locations rather than a village, which already has an allocation for 20 residential units. The Council's strategy for amending the settlement boundary of Far Forest is not justified on proportionate evidence. This is especially the case when there are reasonable alternatives (i.e. Clows Top), where new infill residential development would be more appropriate in terms of their accessibility to higher order centres and retaining their village facilities. It is also our contention that the amendments to the settlement boundary of Far Forest will result in potential windfall sites, which will fail to accord with local and national policy guidance. As highlighted above, the land adjacent of Tolland is identified as of high ecological value. Therefore, any proposal for infill residential development is likely to result in significant harm. By including both land adjacent to Tolland and Orchard House, it is clear that there will be only one access point into these parcels of land off Plough Lane. Any infill scheme for both parcels could result in the provision of 12 new properties. Plough Lane is a minor rural road and designated public right of way. Any intensification of traffic movements along this narrow track will likely cause significant harm to highway and pedestrian safety. The key constraints of Plough Lane are as follows: • It is a Public Footpath (Worcestershire path number RK-541 {label 541B} • Has no legal right of use for motorized vehicles (Section			

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							34[1] of the Road Traffic Act 1988) except for long term established use by its 13 properties. • Is single track being 2.8 metres wide. • Has a (mostly) rough broken metalled surface. • Has a dangerous exit onto A4117. • Is directly opposite a busy public house car park. • Is adjacent to a busy shop car park. • Is directly opposite the bus stop. • Is not wide enough to allow 2 vehicles to enter/leave at the same time. • Has poor visibility to the right because of bollards and parked vehicles (including HGVs) outside Forest Stores. • Has poor visibility to the left due to the rise in the A4117 from the junction • New infill residential development for up to 12 new properties will fail to accord with paragraph 108 of the updated Framework which seeks to ensure that development results in a safe and suitable access to a site, which can be achieved for all users. <u>Conclusion to Question 6:</u> The National Planning Policy Framework (NPPF) (para 35) states that to be sound a local plan must be: • *Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;* • *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;* • *Effective – deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and* • *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.* It is our contention that the Council's updated Local Plan cannot be found sound. The re-drawing of the settlement boundary in Far Forest has not been justified through an appropriate strategy taking into			

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							account reasonable alternatives or proportionate evidence. The above representations make this very clear. This therefore leads to a Local Plan, which fails to accord with the national policy and will not deliver sustainable development as defined by the updated Framework. I would therefore respectfully request that the Inspector finds the updated Local Plan unsound.			
Jones Clive	LPPS92	Policy 36	Yes	No	Yes	Justified Effective Consistent with National Policy	My view is that, in very many cases, the plan sets out a sensible approach for future housing growth. I know that this will require release of greenfield land and most of that will be Green Belt. While I have misgivings about the impact on Cookley of the new village at Lea Castle, I can accept the proposal only if the plan also provides for growth in all other settlements and villages. This is where the plan fails to be consistent with national policy and provided a justified and effective approach, by failing to include any growth at Blakedown. The plan provides for growth in all villages and settlements, by reviews of settlement boundaries or allocation of specific sites as in policy 36. Other sites in rural areas are reserved for future housing development to be released through neighbourhood plans. The inspector will find this approach in every settlement from Rock and Far Forest to Wolverley, Wilden and Chaddesley Corbett. The only exception is Blakedown. It stands out like a “soar thumb” for several reasons. Blakedown needs housing growth just like any other village or settlement of similar size. It is not a small place consisting of a handful of dwellings. Its population is over 1,500 people and it supports a range of services and community facilities. It has a primary school and church, a vibrant village hall, two public houses and a village shop with post office. However Blakedown also benefits from a facility that no other rural settlement in Wyre Forest enjoys, which is a mainline railway station providing direct travel links to Kidderminster and in one direction to Stourbridge, Birmingham and beyond and in the other to Hartlebury (a major employment site), Worcester and further south. It also enjoys the benefit from being on the strategic A456 road which is served by regular bus services from Kidderminster to Hagley and Halesowen. It is not only odd that there is no housing growth allocated to Blakedown but I believe positively perverse when you consider that it enjoys sustainable transport links that are the envy of much larger towns. The village should be a “growth point” with	There should be land allocated for housing in Blakedown and settlement boundaries should be adjusted to reflect that. I suggest as a minimum the field to the north west of the A456 adjacent to Station Drive. A housing development here could include and help funding some additional car parking to serve the station, which can accommodate more growth in train users. The north eastern end of this field dips away quite sharply to a stream and thereby provides a strong eastern boundary to the village: it would not materially encroach on the separation between Blakedown and West Hagley. To the south east of the A456, the fields between the primary school and Harborough Hall and along the eastern side of Belbroughton Road could also be allocated in this plan or perhaps removed from the Green Belt and reserved for future housing development. Such allocations could “round off” the settlement in the direction of Belbroughton where, at the moment, land on one side of Belbroughton Road is developed but the other side is not. Significant housing growth would meet the future needs of the village and other potential residents but could also help fund much needed affordable housing, which is at a premium in rural areas such as this.	No	

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							housing allocations to support local needs (where does the council think the children and grandchildren of Blakedown residents going to live if there is no growth?) but to also provide an excellent sustainable location for people who wish to live in a smaller rural settlement and commute to employment in a wide area. Such growth would also support and reinforce the position of local services and community facilities. I accept that land around this village is in the Green Belt. So are many other areas that are identified by the plan for release for development. The allocations that I put forward below would not lead to urban sprawl or result in the joining of Blakedown with West Hagley or other nearby villages. Instead they would provide growth to meet future needs, with much-needed affordable housing as the scale of growth would support that.			
Chaddesley Corbett Parish Council	LPPS204	Policy 36	Yes	No		Justified Effective Consistent with National Policy	Policy 6B (Table 6.0.3) seeks to allocate sites for development in villages washed over by the Green Belt without establishing that there are any exceptional circumstances that would justify it. This is contrary to the provisions of the National Planning Policy Framework (NPPF). Policy 36.7 seeks to allocate for development a site in the Chaddesley Corbett Area in a Parish washed over by the Green Belt and one that has a 'Made' Neighbourhood Plan (NP). A site allocated for development in the NP has delivered 11 small market price houses and 4 flats. The obligation to include affordable housing was offset by a payment to WFDC. Contrary to the need identified in the Housing Needs Survey, only one property was bought by a local person, the rest sold to people outside the Parish for investment. There is still, arguably, a need for affordable housing, but allocating this site in the Local Plan will not deliver any.	Policy 6B (Table 6.0.3): Delete references to 'allocated sites' for villages washed over by the Green Belt. Policy 36 - delete Policy 36.7 and any reference to site WFR/CC8, Fold Farm Chaddesley Corbett. Appendix B (Chapter 30 site plans) - delete the map for Fold Farm site (page 64) and amend the overview map accordingly.	Yes	So that we can provide an update on the review of our Neighbourhood Plan to underline the rationale for our objections to the Local Plan site allocation.
Watkins Robert	LPPS598	Policy 36		No		Consistent with National Policy	In Policy 36: Village and Rural Areas Site Allocation, two site, BR/RO/2 at Lem Hill, and WA/UA/6 at Red Lion Car Park are not sustainable locations as they are in open countryside too far away from Settlement Boundaries. This is contrary to the NPPF and would set an unhelpful precedent.	Exclude there two sties from Policy 36 and delete Policy 36.1 (Lem Hill) and 36.5 (Red Lion Car Park).	No	
Land Research & Planning Associates Ltd	LPPS836	Policy 36	Yes	No	Yes	Positively Prepared Justified Effective Consistent with National Policy		Allow land to be allocated such as has been promoted; but rejected by the LPA [Ref.: BR/RO/14 at Pound Bank] where landowners have offered 50% to be Affordable Homes in the Call for Sites/Preferred Sites Consultation in which we responded in August 2017. At paragraph 36.2 in the Local Plan Pre-consultation Responses [Oct 2018], the	Yes	In order to be able to have constructive dialogue with the Local Plan Inspector about the misconception that this Site is unsuitable and the NPPF requirements referred to above.

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								LPA has indicated in conjunction with other sites in Far Forest that it is a green field site [accepted] but is constrained by Ecological matters. The latter is absolutely refuted by our clients and no evidence has been shown by the LPA to substantiate this statement. Nevertheless the Reasoned Justification importantly confirms that: "Far Forest has a thriving Primary School – a Public House – a Shop and Churches" yet the Officer's comment upon our representation in 2017 that it is not located in a suitable position. It is close to main A456 and just 5 minutes to Bewdley. The Highway Report attached confirms that there are not any safety or access issues in accessing this land for Housing up to a sustainable figure. In addition the Local Plan does not accord with the advice set out in the NPPF 2018 and so this has not been met at paragraphs: 8b - 09 – 11a & 11b – 20a & 20b - 59 – 68 – 77 – 78 – 110a making the Plan unsound. Paragraphs 78/9 of the NPPF seek to assist the Rural Areas. The choice by WFDC in regard the west of Bewdley of some Sites is inconsistent with the reasons for rejecting our clients' Sites. These chosen Sites [Refs WF/UA/ 1, 4 and 6] which are more isolated than the land at Pound Bank are located much further away from other development suggesting that if these are regarded as Sustainable Locations - then our clients' land at Pound Bank surely must be too. In any event the Allocation in the Rural Areas is only 69 in total which is unacceptable in area not designated as Green Belt. This is not compliant with 78/79 of the NPPF. Paragraph 69 seeks that 10% of the Local Plan requirement should provide areas of 1 hectare or less to allow smaller developments. Upon examination of the Local Plan it is difficult to see where [if at all] that advice has been followed. The Plan does not provide for all the Social		

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								needs of the Community as there is a District Wide deficiency of land for Affordable Homes and so is not compliant with the NPPF and is therefore NOT Sound. There is a serious need to significantly modify Policies 8B and 8C which we shall draft for the Inquiry plus modification of other relevant Policies to address this shortfall.		
Worcestershire County Council, Planning Economy & Performance	LPPS984	Policy 36					Failure to allocate land for the phase 2 of Blakedown station totally undermines this case. A suitable area of land was submitted to the plan through the call for sites, but unfortunately has not been included in the draft plan, despite it being (with regard to transport) a sustainable location. This requirement was outlined in WCC's adopted Local Transport Plan 4, and has been discussed with Wyre Forest DC officers at a number of meetings concerning the Local Plan. Through the Duty to Co-operate we would like work together to address this omission, and to develop a solution which enables us to deliver the required expansions and sustainable transport aspirations of the Wyre Forest Local Plan and the Local Transport Plan.			
Bareford David	LPPS134	36	No	No	No	Consistent with National Policy	No comments but modifications have been proposed.	WFR/WC/37 Land at Caunsall Road, Caunsall I would argue is in the Green Belt. See Key diagram	Yes	To be heard
Worcestershire Wildlife Trust	LPPS352	Policy 36	Yes	Yes	Yes		The WWT welcome this policy and consider that it is both legally compliant and sound.		No	
Watkins Robert	LPPS601	Policy 36	No	No	No	Positively Prepared	The Housing Needs Study (2018) shows an average demand of 276 dwellings/year over the plan period. Over the last 10 years (2008 - 2018) average net completions have been 248, so the target of 276 is achievable. However sub-area data is presented by political wards (e.g. Tabled 4.1; 4.2) three of which are geographically large and contain a mixture of town (or large nucleated villages) and extensive rural areas. The translation of Housing Needs Data by ward into site allocation policies is logical and transparent in the two large urban areas of Kidderminster and Stourport. However such a	Policies 18B and 36 require modifications to better reflect disaggregated data on housing needs. The policies should also insist that new dwellings are for local need and/or affordable by making an explicitly link to Policy 6B Table 6.0.3	Yes	Until the LPA presents disaggregated data it will not be possible to come to firm conclusions. There is no other opportunity to make representations other than at the oral examination.

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							direct translation is not possible in Bewdley and Rock; Wribbenhall and Arley; and Wyre Forest Rural (which contains the nucleated settlements of Cookley, Wolverley, Chaddesley Corbett and Blakedown). It is therefore not possible to conclude whether or not the housing allocation for these 3 areas is a sustainable way a meeting the objectively assessed housing needs. This is especially so as there are no specific new allocations for Wolverley, Cookley and Blakedown, all 'sustainable' settlements, and only one small allocation (BR/BE/1) in Bewdley Town, this having an estimated capacity of just 15 dwellings (Table 34.0.1). Even though the Settlement Boundaries of Rock, Bliss Gate, Callow Hill and Far Forest have been extended slightly, and that for these Policy 18B applies, I still conclude that the rural housing allocations policy 36 Villages and Rural Sites is 'unsound' as it has not, in part, been 'positively prepared', by having a clear link to data on housing need.			
Marmaris Investments Ltd.	LPPS854	Policy 36	No	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	This policy should refer to the land at Station Drive, Blakedown as an allocation for up to 45 dwellings, plus up to 45 units of elderly accommodation and station car parking.	This policy should refer to the land at Station Drive, Blakedown as an allocation for up to 45 dwellings, plus up to 45 units of elderly accommodation and station car parking.	Yes	Green Belt / transportation / housing issues are important areas of the plan and inclusion in the debate at the Examination will be useful to the Inspector
Worcestershire County Council, Planning Economy & Performance	LPPS993	Policy 34					**Proposed Mineral Consultation Area (MCA) in Fourth Stage Consultation on Minerals Local Plan? (mineral resource)** WFR/WC/36 Rock Tavern Car Park Caunsall and WFR/WC/37 Land at Caunsall Road, Caunsall.	Policies 36.9 and 36.10 should require the developer to undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it.		

APPENDIX 3: LOCAL PLAN REVIEW PRE-SUBMISSION PUBLICATION DOCUMENT (OCTOBER 2018) - CONSULTATION RESPONSES TO CHAPTER 37: MONITORING AND IMPLEMENTATION FRAMEWORK

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Gladman Developments Ltd	LPPS886	Monitoring and Implementation Framework	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Monitoring the policies contained in the Local Plan is central to assessing their effectiveness and whether or not the Council is meeting the objectives of the Plan. It is noted that there is no policy mechanism included within the Plan to ensure that any potential housing shortfall will be addressed as quickly as possible. Gladman believe that it would be prudent if the Local Plan included a review policy within the plan which needs to be clear, easily understandable, and effective, by setting achievable targets for the completion of the review. Specifically, the triggers for the review need to be meaningful, have teeth and contain an end date that is in the control of the Council. The policy should also include consequences for failing to meet the target dates. Gladman refer to the North-West Leicestershire Local Plan (adopted November 2017) as an example of an effective and implementable review policy. Policy S1 states: "*The Council will continue to work collaboratively with the Leicester and Leicestershire Housing Market Area (HMA) authorities to establish the scale and distribution of any additional provision that may be necessary in North West Leicestershire and elsewhere in the HMA as a result of the inability of one or more authority to accommodate its own needs as identified in the Leicester and Leicestershire Housing and Economic Development Needs Assessment.* *The District Council will commence a review of this Local Plan (defined as being publication of an invitation to make representations in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012) by the end of January 2018 or within 3 months of the adoption of this Local Plan (whichever is the later). The Plan Review will be submitted for examination within two years from the commencement of the review. In the event that the reviewed plan is not submitted within two years then this Local Plan will be deemed out of date. "* A review mechanism included in the Plan is considered necessary given that a SoCG has not been prepared to provide evidence to demonstrate how cooperation has occurred with neighbouring authorities.	A review mechanism should be included in the Local Plan given that a SoCG has not been prepared to show how cooperation has occurred with neighbouring authorities.	Yes	To discuss the issues raised in our written submissions.
Fillingham Anthony	LPPS12	all	Yes	Yes	Yes		No comments.		No	