

Wyre Forest District Local Plan 2016 - 2036

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

Pre Submission Publication

Consultation Period September / October 2019

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1) Statement of Publication Consultation (September/October 2019)

Purpose of this Report

This document has been prepared to meet the requirements of Regulation 22(c) (v) of The Town and Country Planning (Local Planning) (England) Regulations 2012. The document will be submitted alongside Wyre Forest District Local Plan 2016-2036. It sets out details of the number of representations made in response to the publication period (September/October 2019) and a summary of the main issues raised by those representations.

Regulation 22 (c) also requires a statement detailing representations made at Regulation 18 stage. This requirement was fulfilled by the publication of the following documents alongside the Pre-Submission Publication Document:

- [Summary of Consultation Responses, Local Plan Preferred Options Consultation June 2017](#), approved by Cabinet on 30 October 2018 and
- [Local Plan Review Issues and Options Paper Consultation Responses \(September 2015\)](#), approved by Cabinet on 22 December 2015

These documents can be found on the Council's website at www.wyreforestdc.gov.uk/localplanreview

Introduction

This report sets out a summary of the consultation responses received by Wyre Forest District Council for the consultation on the Local Plan Review Pre-Submission Publication consultation held during September/October 2019.

Background

As part of the Local Plan Review, the Council produced a 'Pre-Submission Publication' document for consultation which took into account the Issues and Options consultation carried out in late 2015, the Preferred Options consultation carried out in Summer 2017, along with the body of evidence that the District has now developed. The Pre-Submission document identifies the Council's development strategy for how the district intends to meet its development requirements in the period up to 2036 along with proposed strategic, development management and allocations policies. The Pre-Submission consultation ran from 1 November to 17 December 2018.

The Council re-opened the Pre-Submission consultation for further comments to be made on the Local Plan in September/October 2019. This was following some updates to the evidence base documents which were found necessary as part of the statutory consultation responses received to the November/December 2018 consultation. Some amendments to the Local Plan were also consulted on and these were shown in the Amendments to the Pre-Submission Publication Document (July 2019).

Pre-Submission Publication Consultation (2019)

The re-opening of the Local Plan Review Pre-Submission Consultation took place between 2 September and 14 October 2019. This was the fourth consultation of the Local Plan Review. All representations

received during this publication stage will be submitted with the Local Plan to the Secretary of State for examination in public. The consultation responses received for the November/December 2018 consultation will also be submitted to the Secretary of State for the purposes of the examination.

During the consultation period the Council sought views on the Pre-Submission documents, including the amendments document. The Pre-Submission consultation is the main consultation opportunity for the community and other stakeholders to comment on the 'soundness' of the Local Plan, as set out in NPPF paragraph 35. The consultation was in accordance with the Town and Country (Local Planning) (England) Regulations 2012, as set out in the Statement of Community Involvement (adopted February 2013). A total of 296 respondents submitted representations to this consultation.

Next Steps

Following this final stage of consultation, the Local Plan will be submitted to the Secretary of State who will then appoint a Planning Inspector to undertake the examination in public of the Local Plan. See the Local Development Scheme for details of the Local Plan project plan:

<https://www.wyreforestdc.gov.uk/planning-and-buildings/planning-policy/project-plan.aspx>

2) Publicity for the Local Plan Pre-Submission Publication Consultation

Consultation Plan September 2019

A Consultation Plan for the re-opened Pre-Submission Publication consultation in September/October 2019 was prepared by Officers and approved by Cabinet on 16 July 2019. The Consultation Plan can be found at Appendix A.

Letter, Emails and Publicity

Over 2700 emails / letters were sent out to all stakeholders on the Local Plan Consultation Database, including all those who had made submissions to the 'Call for Sites' exercise. This informed them of the Pre-Submission consultation, detailed where to get further information (including dates of consultation drop-in sessions) and explained how to respond. A copy of the letters sent can be found at Appendix A of this document.

A publicity leaflet was delivered to households and businesses within the District by a mailing distribution company. The leaflet gave notification of the re-opening of the Local Plan Review Pre-Submission consultation and outlined the dates and times of the consultation drop-in sessions where documents could be viewed and details of the consultation website where documents could be downloaded. It also gave details on how to respond to the consultation and the closing date. The publicity leaflet can be found at Appendix A of this document.

People were given the option of responding to the consultation through an online consultation response portal, electronically by email or post. Responses needed to be submitted using the consultation response form and no late responses were accepted (i.e. responses received after 5pm on 14 October 2019 were not accepted). Guidance notes were also provided to help people complete the consultation response form. The response form and guidance notes can be found at Appendix A.

The Pre-Submission document, Amendments document and Sustainability Appraisal were available for public viewing at Main Reception at Wyre Forest House, the Hub in Kidderminster, and local libraries within the District.

The Pre-Submission document, Amendments document, Sustainability Appraisal and all the evidence base studies were made available for public viewing on the Council's website and were also made available at all of the four consultation drop-in sessions.

Posters were taken for display to a wide range of accessible locations throughout the District, such as local supermarkets and train stations. The table below lists the locations:

Table: Poster Displays

KIDDERMINSTER
Kidderminster Library
Kidderminster Town Council
Wyre Forest District Council Hub
Wyre Forest Leisure Centre
Tesco Superstores
Morrisons
Sainsbury
Co-op Franche
Hodge Hill Garden Centre
Barnetts Hill Garden Centre
Church Street Surgery
Northumberland House
Aylmer Lodge Cookley Partnership
Kidderminster Health Centre
Kidderminster Medical Centre
Stanmore House Surgery
Cafe Nero
Coffee #1
Tesco Express Comberton Hill
Tesco Express Bewdley Hill
Tesco Express Stourport Road
Tesco Express Stourbridge Road
Nisa, Horsefair
Nisa, Tennyson Way, Offmore
Costcutter Lister Road
Costcutter Hurcott Road
Costcutter Willowford Drive
Costcutter Godison Crescent
Spar Marlpool Lane
Kidderminster Bus Station
Kidderminster Railway Station
Severn Valley Railway Station
Reel Cinema
STOURPORT
Stourport Library
Stourport on Severn Town Council

Stourport Civic Hall
Tesco
Lidl
Cooks Garden Centre
Stourport Medical Centre
Mercian House Dental Practice
York Street GP Surgery
Froggies Cafe
Gingers Cafe
Clean Call (display boards High Street Stourport)
Nisa, Bewdley Road
BEWDLEY
Bewdley Library
Bewdley Town Council
St Georges Hall, Bewdley
Bewdley Museum
Bewdley Leisure Centre
Co-op
Tesco
Courtyard Cafe, Hopleys
Kimmy Loves Cake Cafe
Courtyard Cafe, The Shambles Museum, Bewdley
GP Surgery
Wribbenhall Parish Rooms
RURAL AREAS
Wyre Forest Discovery Centre
Far Forest Stores
Colliers Farm Shop, Clows Top
Clows Top Post Office
Cookley Village/Sports Hall
Cookley GP Surgery
Cookley Tesco
Costcutter Fairfield shop
Wolverley GP Surgery
The Farmers Den Cafe, Cookley
Blakedown Post Office
Blakedown Parish rooms
Blakedown Railway Station
Chaddesley Corbett Post Office
Rowberrys Farm Shop, Chaddesley Corbett
Upper Arley Post Office
Upper Arley SVR Station
Chaddesley Corbett GP Surgery
The Village Butcher Chaddesley Corbett

All Town and Parish Councils were sent a consultation poster and asked to display it on their notice boards for public viewing. The poster can be found at Appendix A of this document.

Web-based Communication and Social Media

Interactive versions of the Pre-Submission Documents (including the amendments document) were made available to enable electronic representations to be made. The consultation response form could also be downloaded and printed or filled in and submitted online. Completed consultation response forms were also accepted by email or post. A copy of the consultation response form can be found at Appendix A of this document. The consultation response form followed a similar structure to the standard response form issued by the Planning Inspectorate.

A link to the Local Plan Review Pre-Submission consultation was made available on the homepage of the Council's website. There was also a promotional banner on front page of website throughout the duration of the consultation period.

The Local Plan Review Pre-Submission document, Amendments document, Sustainability Appraisal and all the evidence base studies were available for viewing on the Council's Planning Policy web pages (<http://www.wyreforestdc.gov.uk/localplanreview>). The website also included full details of how to respond to the consultation, including the consultation response form and an online consultation response portal.

The re-opening of the Local Plan Review Pre-Submission consultation was promoted through the Council's Facebook and Twitter accounts. Promotional cover photograph images were added to Facebook and Twitter for the duration of the consultation period. Facebook events were created for each of the drop-in sessions. Regular social media posts, promoting the consultation and drop-in sessions, including during the networking hours.

Facebook (number of people reached and the number of engagements and shares):

- 2 September – Re-opened the Local Plan Pre-Submission consultation – 1,496 people reached, 27 engagements and 5 shares.
- 4 September – promoted Local Plan and drop-in sessions – 330 people reached, 3 engagements.
- 6 September – promoted Local Plan drop-in sessions – 306 people reached, 5 engagements.
- 8 September – promoted Local Plan and drop-in sessions – 615 people reached, 2 engagements.
- 9 September – promoted Local Plan and drop-in sessions – 621 people reached, 3 engagements.
- 10 September – promoted Local Plan and drop-in sessions – 207 people reached, 1 engagement.
- 11 September – promoted Local Plan and drop-in sessions – 161 people reached, 2 engagements.
- 13 September – promoted Local Plan and drop-in sessions – 703 people reached, 5 engagements and 1 share.
- 15 September – promoted Local Plan and drop-in sessions – 709 people reached, 8 engagements.
- 16 September – promoted Local Plan and drop-in sessions – 1,772 people reached, 69 engagements and 5 shares.

- 17 September – promoted Local Plan and drop-in sessions – 601 people reached, 3 engagements.
- 18 September – promoted Local Plan and drop-in sessions – 587 people reached, 3 engagements.
- 19 September – promoted Local Plan and penultimate drop-in session – 569 people reached, 5 engagements and 1 share.
- 24 September – promoted Local Plan and final drop-in session – 2,693 people reached, 54 engagements and 2 shares.
- 26 September – promoted Local Plan and final drop-in session – 456 people reached, 1 engagement.
- 28 September – promoted Local Plan and final drop-in session – 495 people reached, 2 engagements.
- 1 October – promoted Local Plan – 378 people reached, 2 engagements.
- 3 October – promoted Local Plan – 333 people reached, 3 engagements.
- 6 October – promoted Local Plan – 576 people reached, 5 engagements.
- 8 October – promoted Local Plan – 312 people reached, 4 engagements and 1 share.
- 10 October – promoted Local Plan – 245 people reached, 1 engagement.
- 13 October – promoted last chance to comment on Local Plan – 343 people reached, 3 engagements.

Twitter:

- 22 tweets were sent out during the consultation period reaching a potential audience of many thousands.

Wyredin, a bi-monthly email news letter for residents

Consultation on the Pre-Submission document featured in the August 2019 edition of Wyredin. There are over 2,000 subscribers to the newsletter. See article here:-

[August](#) 2019

GovDelivery

The GovDelivery new email marketing system, introduced in December 2018 was used.

- 2 September – GeoDelivery planning newsletter (372 subscribers)
- 9 September – GeoDelivery planning newsletter, promoted drop-in session at Blakedown.
- 16 September – GeoDelivery planning newsletter, promoted drop-in sessions at Kidderminster Town Hall and Wribbenhall Parish rooms, Bewdley.
- 23 September – GeoDelivery planning newsletter, promoted drop-in session at Stourport Civic Hall.
- 7 September – GeoDelivery planning newsletter, highlighted one week left.
- 14 October – GeoDelivery planning newsletter, highlighted last day.

Other Comms

- 2 September – Changed Facebook and Twitter cover photo, Local Plan webpages went live and feature box on website homepage.
- 4 September – Included in internal newsletter Wyred Weekly (250 subscribers)
- 23 September – Changed website banner.

Press Coverage

Press releases were issued by the Council on the following dates ahead of the consultation:

- 27th June 2019 – Council debates draft Local Plan
- 23rd August 2019 – ‘Have your say on the Wyre Forest District Council’s Local Plan Pre-Submission consultation’

The Press release from the Council can be viewed here:

- [Council debates draft Local Plan](#)
- [Have your say on Wyre Forest District Council’s Local Plan Pre-Submission consultation](#)

The Kidderminster Shuttle newspaper published news articles about the Local Plan Pre-Submission document during the course of the consultation period.

Engagement with Residents and Stakeholders

During the re-opening of the Pre-Submission consultation four drop-in sessions were held. These were staffed at accessible locations in the three main towns of the District; Kidderminster, Stourport-on-Severn and Bewdley. A consultation drop-in session was also held in Blakedown due to the new site allocation adjacent to Blakedown railway station. Display boards were erected at the drop-in sessions. The drop-in sessions provided an opportunity for residents and stakeholders to raise questions regarding the proposals set out in the Local Plan Review Pre-Submission documents, Sustainability Appraisal and all the evidence base studies prior to making a formal response. This included weekday/weekend drop-in sessions at the following venues:

Date	Time	Venue
Wednesday 11 September 2019	3pm – 6pm	Blakedown Parish Rooms, 18 Belbroughton Road, Blakedown, DY10 3JG
Wednesday 18 September 2019	3pm – 7pm	Corn Exchange, Kidderminster Town Hall, DY10 1DB
Thursday 19 September 2019	2pm – 4:30pm	Wribbenhall Parish Rooms, Bewdley, DY12 1DQ
Saturday 28 September 2019	10am – 1pm	Stourport Civic Hall, DY13 8UJ

The drop-in sessions were attended by over 437 people. The publicity leaflet that was sent out to households and businesses within the district detailed these drop-in sessions.

Duty to Cooperate

The Duty to Cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It 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 Plan preparation in the context of strategic cross boundary matters.

In order to fulfil the requirements of the Duty to Cooperate, all neighbouring authorities and consultation bodies covered by the Duty to Cooperate were notified of the consultation and how to respond. This demonstrates that the Duty has been fully considered and complied with at this stage of the Local Plan Review. Where cross-boundary issues were identified, Officers met with each of the neighbouring authorities or organisations concerned to discuss the issues and how the Plan can best address them. Statements of Common Ground have been prepared where necessary.

Processing of Comments Procedures

All responses submitted to the District Council, online by letter and email, were acknowledged by the Council. The Planning Policy Team carefully analysed all comments and suggestions to prepare this report which is a statement of the publication consultation and includes a summary of the consultation responses received. This report will be presented to and considered by the Local Plans Review Panel, Overview and Scrutiny Committee and Cabinet.

3) Respondents and Representations

There have been 296 respondents to the consultation. These respondents have raised 545 representations in total. Each individual or organisation making responses is known as a respondent. A single respondent can make multiple representations.

In addition the Council received 7 responses from resident groups in relation to the plan from the following groups:

- Burlish Concerned Residents Group
- Cookley and Caunsall Neighbourhood Plan Group
- Friends of Patricks Field (Petition)
- Offmore Comberton Action Group
- Wyre Forest Community Land Trust
- Stop Lea Castle Farm Quarry Action Group
- Dunley Park Residents

More information on these resident group responses can be found at Section 4e of this document.

4) Summary of Consultation Responses from Statutory Consultees, Parish and Town Councils and Petitions

This section sets out a summary of the key issues raised by the following:

- 4a) Statutory Consultees
- 4b) Wyre Forest Parish and Town Councils
- 4c) Parish Councils outside of Wyre Forest District
- 4d) Other Non-Resident Representations
- 4e) Petitions and Residents Groups

4a) Statutory Consultees – Key Issues

The following gives a summary of the key issues raised by the Statutory Consultees. A list of the statutory and specific consultees consulted can be found at Appendix B of this document.

Worcestershire County Council

Worcestershire County Council (WCC) welcomes the allocation of land for further expansion of Blakedown station and associated car parking, in line with WCC recommendations. This reflects the opportunity that rail offers to mitigate existing and future generated demand on strategic highway corridors (especially the A456), enabling genuinely sustainable growth opportunities in the Wyre Forest.

Mineral and waste – WCC's 2018 response included a schedule of recommendations for additions to specific allocation policies to ensure they fully reflect the need to take account of minerals and waste safeguarding. WCC and WFDC officers subsequently met in January 2019 to discuss amendments to site-specific policies, and reached agreement on a list of amendments that would be required. These agreed amendments have not yet been reflected in the text of the plan. WCC is satisfied that these changes can be accommodated within main and/or minor modifications, and is actively engaged with WFDC to agree specific wording. WCC will also expect this to be reflected in a Duty to Co-operate agreement/Statement of Common Ground between WCC and WFDC.

Ecology – WCC support the proposed wording of Policies 11D and 14 and find this broadly consistent with guidance on Biodiversity Net Gain as published by CIEEM, CIRIA and IEMA.

WCC note that proposed site FPH/1 has been deleted, however WCC also note that some areas of the FPH/1 site, specifically those comprising Wilden Marsh and Meadows (SSSI), fall within the South Kidderminster Enterprise Park (SKEP). To ensure clarity and provide certainty for developers, WCC recommend that the footprint of the SSSI is excluded from the policies map and additional wording is inserted into paragraph 30.74 to ensure appropriate environmental consideration and to ensure environmental betterment through development of the abutting PDL. WCC suggest the following wording:

“Although the area of the SKEP covers some natural features and Green Belt land, development will only be permitted on previously developed sites. The site designation lies adjacent to Wilden Marsh and Meadows SSSI and the associated, former settling ponds west of Wilden Lane. Impacts on this land are to be considered as part of any application for development and positive benefits consistent with policy 11(d) secured to enhance this area.”

Health and wellbeing – WCC Planning and Public Health officers have identified improvements that should be made to Policy 9: Health and Wellbeing, and are working with WFDC officers to produce amended policy wording. In particular, WCC believe that HIA thresholds for residential and mixed-use developments should be lowered to include all major developments, and will work with WFDC to address this matter through the Statement of Common Ground. WCC expect all proposed amendments to the Health and Wellbeing policy to be progressed through main modifications to the plan.

Viability – the response received from WCC in December 2018 raised concerns over the viability of the plan. Following revisions to the Infrastructure Delivery Plan and a subsequent plan viability assessment, it is clear that this remains an issue. WCC therefore wish to reiterate their comments on this matter. 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 to fund through their own resources. WCC does not have the resources to directly 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. WCC will continue to work with WFDC to address these matters but caution that WCC may not be able to support individual planning applications if alternative funding sources are not available to support infrastructure delivery.

Statement of Common Ground/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, WCC understand that WFDC propose to produce these to support the submission of the plan. WCC will work jointly with WFDC on the Duty to Co-operate statement with WCC, and will work with WFDC to address the issues outlined in the WCC response prior to submission of the plan.

Conclusion – Although the current Pre-Submission version of the WFDC Local Plan does not fully accord with WCC recommendations made in 2018, WCC officers continue to work with officers from WFDC on proposed main and minor modifications to address the outstanding matters. WCC is confident that, if the Local Plan Inspector agrees to these modifications, they would address any soundness concerns WCC may have. WCC and WFDC are working towards a Duty to Co-operate Statement of Common Ground.

Birmingham City Council

Birmingham City Council generally welcomes the contents of the consultation document in terms of strategic housing issues identified, to which the Council has confined its comments, and the commitment to an early review of the Plan if evidence leads to continued unmet housing need in neighbouring authorities. Birmingham City Council also appreciates the opportunity for continued engagement and working with Wyre Forest District Council through the Duty to Co-operate process.

Policy AM6A – Development Needs 2016-2036

Birmingham City Council supports the approach in paragraph B and welcomes the amendments to this policy to recognise the obligations set out in the NPPF in identifying housing needs that cannot be met in neighbouring local authorities.

Although Wyre Forest District is not part of the Birmingham and Black Country Housing Market Area, there are some functional relationships with the West Midlands conurbation in terms of migration and commuting patterns (as the document itself states in paragraph AM6.20). The plan therefore needs to explicitly acknowledge that any additional housing growth proposed over and above Local Housing Need (LHN), (once all other factors have been taken into account), can be attributed to meeting established unmet need with neighbouring authorities particularly in the conurbation. This includes

Birmingham which has established an unmet housing need of 37,900 through the adoption of the Birmingham Development Plan in 2017.

This will ensure that the Wyre Forest District Plan is compliant with the NPPF. The commitment to an early review is therefore welcome particularly if subsequent evidence shows continued unmet need when the Local Plans for both the Black Country and Birmingham are reviewed in the future.

Black Country Authorities

Housing Representation – The Black Country Authorities (BCA) broadly support the commitment that consideration will be given to a future early review of the WFDC Local Plan where it is established, as part of the Black Country Plan review process, that the Black Country cannot meet its own housing and employment land needs to 2038. However, BCA wrote to Wyre Forest DC (via Chief Executive) in July 2018, and advised that BCA work indicated there was likely to be a significant shortfall in the ability of the Black Country's urban areas to accommodate projected housing growth and BCA asked for cooperation towards meeting the anticipated shortfall in capacity. BCA's preferred position would have been for the WFDC Local Plan to have acknowledged the potential housing shortfall from the emerging Black Country Plan evidence base (with further evidence to be published in November 2019) and attributed some of the WFDC's additional housing allocation to meeting the Black Country's needs.

As part of process for agreeing the Statement of Common Ground with Wyre Forest District Council, BCA would like to explore the point at which an early review of the WFDC plan will be triggered, in accordance with the emerging Draft Black Country Plan and the associated evidence base.

Transport Representation – The A456, from Birmingham to Kidderminster through the Black Country, is already stressed at peak periods, particularly at M5 Junction 3, Grange Island and Hagley. Projected housing growth being provided for in the conurbation and in Bromsgrove, as well as in the authority's plan, will place additional demands on this corridor.

To help meet growing demands for movement in this corridor the transport strategy for the West Midlands conurbation, as articulated in 'Movement for Growth', includes the provision of bus rapid transit, known as Sprint, between Birmingham and Quinton along with the provision of Park & Ride in the Quinton area to serve this route. The future extension of rapid transit in the Walsall to Stourbridge Corridor is also envisaged within the plan period. Through Midlands connect, the Midlands Rail Hub proposal looks to increase capacity on the Snow Hill lines both through the provision of additional platforms at Snow Hill and Rowley Regis but also in the longer term through electrification and more frequent services. These developments will add to the demands on the A456.

The A456 forms part of the West Midlands Key Route Network and a study is underway to bring forward measures to improve the management of this route, which includes a short section beyond the Dudley boundary to the junction at Hagley. However, these resulting measures will not by themselves deal with the future demands on this corridor. Rail and associated strategic park & ride facilities will have an important role to play. BCA would therefore like to place on record their support for the proposed development of a park & ride facility at Blakedown. This should intercept trips; particularly those bound for Birmingham, much earlier and will make better use of existing and future

rail capacity on the Birmingham-Worcester route. In turn, this should provide relief to the highway network including the heavily congested junctions in Hagley.

Bromsgrove District Council

The previous comments submitted by Bromsgrove District Council (BDC) in relation to the WFDC Local Plan still stand. It remains the view of BDC that the WFDC Local Plan is unsound. BDC are still unclear as to what the transport impacts are of the WFDC Local Plan on Bromsgrove District. Concerns were previously expressed on the clarity of the work provided to support the 2018 publication version of the plan. Although efforts have been made to address these concerns, BDC consider the published information does not clearly show what the impacts of the development sites are, and then clearly understand the mitigation strategy. BDC think that a more robust transport evidence base is necessary. BDC also have concerns with the Infrastructure Delivery Plan (IDP) stating in their response that schemes have been untested and in some cases un-costed. It is unclear what the links are between the impact of development and the mitigation that is specified. BDC will continue to work with WFDC and WCC highways to prepare a Statement of Common Ground.

Natural England

Natural England notes and supports the deletion of the former settling ponds at Wilden Lane (reference FPH/1) from the list of allocated sites for Kidderminster (Table 30) and the policies map. This land adjoins Wilden Marsh and Meadows Site of Special Scientific Interest (SSSI). The deletion of FPH/1 is consistent with the NPPF paragraphs 170 and 171. NPPF paragraph 170 regarding the establishment of coherent and resilient ecological networks is supported through the Nature Recovery Network approach set out in the Government's emerging 25-Year Environment Plan.

Natural England welcomes revised policy 30.31 South Kidderminster Enterprise Park (SKEP) for its clear criteria dealing with biodiversity issues at sub sections 3 (Worcestershire Canal and Stour corridor) and 4 (Positive enhancement of the Wilden Marsh & Meadows Site of Special Scientific Interest). Natural England refer the Council to their supporting representation on the deletion of FPH/1 from the local plan's allocations. This land falls within the SKEP as shown on the policies map. In the interests of planning certainty, to foster positive environmental outcomes and to be consistent our supporting representation on the deletion of former allocation FPH/1, Natural England believe the policies map and paragraph 30.74's reference to 'previously developed sites' must make clear that land at the former FPH/1 site is excluded from this reasoned justification's meaning when referring to previously developed sites. The glossary at Annex 2 of the NPPF offers helpful clarification defining exclusions from the definition including: '...land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.'

Natural England has suggested some additional comments/changes to Policy 11D of the Local Plan:-

Policy 11D – incorrect or missing details in Table 11.4.1:

- 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 Hillditch Coppice SSSI
- Showground Meadow, Callow Hill SSSI
- SSSI which would benefit from further information:
 - Kinver Edge SSSI is also notified for geology.

Historic England

Historic England has no concerns to raise in relation to the July 2019 amendments to the Pre-Submission Publication document. It is noted that Historic Impact Assessment work has been undertaken in relation to the proposed site allocation at Blakedown.

The 2018 concerns that Historic England raised remain and HE are aware that WFDC is considering these matters and look forward to continuing to work with the Council on earlier outstanding issues ahead of the EiP.

Environment Agency

Policy AM36.11 Land off Station Drive, Blakedown WFR/CB/3 – The EA note that site WFR/CB/3 is allocated for car parking and residential development (50 dwellings). They have the following comments to make:

1) Flood Risk – Based on the EA Flood Map for Planning (Rivers and Sea) the northern boundary of the site (as shown in Appendix B – Map E), is partially located within Flood Zones 2 and 3 of an ‘unnamed’ tributary (classified as an Ordinary Watercourse) of the Blakedown Brook. Based on the EA records, the watercourse does not benefit from detailed site specific hydraulic modelling. The EA Flood Map in this location is informed by National generalised JFlow modelling of the River Stour (2011). Paragraph 155 of the NPPF states: *“Inappropriate development in areas of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere.”*

The WFDC Local Plan should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change. WFDC should be satisfied that there is sufficient developable area on site, bearing in mind site size and quantum of development, whilst avoiding Flood Zones 2 and 3. In the absence of detailed site specific modelled flood risk information, or a site specific FRA, to confirm an appropriate climate change allowance the Council may wish to utilise the current Flood Zone 2 extent to indicate the likely, nominal, Flood Zone 3 with climate change extent.

Based on indicative scale of development, detailed modelling is likely to be required at the planning application stage to verify the design flood extents, developable areas and ensure that the development will be sustainable.

Whilst Policy AM36.11 makes no reference to the areas of Flood Zone 2 and 3 present within the site allocation which is an omission, the EA note point 5 refers to the Churchill and Blakedown Valleys Local Wildlife Site adjoining the site to the north and the requirement for buffering embankment and woodland retained as open space. The LWS on site appears to coincide with the areas of Flood Zones 2 and 3.

2) Waste Water Infrastructure – The site does not appear to have been assessed within the Water Cycle Study (WCS) and therefore it is unclear whether the proposed housing growth can be accommodated in consideration of waste water infrastructure. Information on local treatment works and their ability to accommodate housing and employment growth are included within the WCS. The EA recommend the Council identifies the receiving sewage treatment works and whether the housing can be accommodated without impacting upon the receiving treatment works. The Council should look at physical capacity issues (e.g. network pipes) in consultation with the Water Company; and environmental capacity (quality of treated effluent) issues.

Highways England

Highways England previously commented on both the Preferred Options consultation undertaken in 2017 and the Pre-Submission regulation 19 consultation undertaken in December 2018. In these consultation responses Highway England outlined the potential implications of development traffic on the SRN, specifically at M5 Junction 4.

Although M5 Junction 4 is not located in Wyre Forest, Highways England considers the traffic implications of future developments within the district are cross-boundary. M5 Junction 4, in Bromsgrove district, is one of two principal points of access to the SRN, along with M5 Junction 3, for longer distance and commuting journeys beginning or ending within Wyre Forest.

Following engagement with WFDC, Highways England commissioned technical work, including traffic modelling, that has demonstrated that the effects of Local Plan growth in Wyre Forest will exacerbate existing traffic congestion issues on the A491 Sandy Lane arm of M5 Junction 4. This is the junction arm used by traffic routeing to or from Wyre Forest.

The conclusion of this work was that, due to the connection between these SRN issues and the Wyre Forest Local Plan growth, highway-related intervention will be necessary in order to deliver the overall growth envisioned within the plan.

Highways England recommends that the Wyre Forest District Infrastructure Delivery Plan (IDP) should be updated to include a scheme at M5 Junction 4 capable of mitigating the transport implications of the plan at this location. Highways England has also suggested the following modification to paragraph 13.11 of the Local Plan:-

“The District does not benefit from local access to the motorway network (M5); however, **M5 Junctions 3 and 4, which lie within Bromsgrove, provide key access from Wyre Forest to the Strategic Road Network for journeys by road.** They provide connections to the wider West Midlands Conurbation, including **Birmingham and parts of the Black Country** to the north/east, and Bromsgrove and Redditch to the **south** east, and as well as **links to Worcester** to the south. This in turn provides access to the local principal road network.”

Sport England

Sport England submitted comments on the 2019 Pre-Submission Draft Local Plan Review consultation. In summary, these comments are as follows:

Sport England withdraw their previous objections for:

- Policy 6B (now Policy AM6B) and the associated table 6.0.3 (now table AM6.0.3)
- Policy 33.20 (now Policy (AM33.21) relating to Minster Road outdoor sports area
- Policy 10A (now Policy AM10.7) relating to deletion of employment allocation LI/12 – Burlish Golf Course Clubhouse)

Sport England has submitted a new objection for:

- Policy AM8G (site provision for Travelling Showpeople)

Sport England has amended its previous objection to comment on:

- Policy 14 (Strategic Green Infrastructure)
- Policy 31 to Policy 31.1 (Lea Castle Village)
- Policy 32, 32.3, 32.4 (Kidderminster Eastern Extension)

Sport England has amended previous support to objection for:

- Policy 20C and associated paragraphs 20.14 to 20.19 (provision of Open Space, Sports Pitches and Outdoor Community Uses in Housing Development)

Sport England also maintains objection with additional information for:

- Policy 33.8 and 33.16 (site allocations LI/11 – Land west of former school Coniston Crescent and MI/38 School site Coniston Crescent).

Policy AM6B Locating New Development and Table AM6.0.3 – Sport England made representations on the 2018 pre-submission draft commenting that in order to ensure consistency with the rest of the plan, particularly Policy 6E which includes protection/provision of outdoor sports facilities, para 97 of the NPPF and the Council's evidence in the adopted Playing Pitch Strategy and Built Sports Facilities Strategy, that 'sport and recreation uses' should be added to the types of suitable development in Stourport-on-Severn, to reflect the settlement includes several sports facilities. Table AM6.0.3 makes this modification and so Sport England's objection has now been addressed. Sport England does not wish to object to this proposed modification.

Policy AM8G Site Provision for Travelling Showpeople – Proposed modification Policy AM8G now proposed to allocate the former Burlish Golf Course Clubhouse site (LI/12) for development for Travelling Showpeople. In the 2018 pre-submission draft, the clubhouse site was proposed for employment use, for which Sport England raised objection to policy 10A, table 10.0.1 and site allocation LI/12. In essence, the proposed modifications switch these two proposed allocations. The basis for Sport England's objection to the employment allocation of site LI/12 was that the loss of the golf course and its associated club house had not been justified in accordance with paragraphs 96 and 97 of the NPPF. Sport England commented that neither the Council's Playing Pitch Strategy (PPS) nor its Built Sports Facilities Strategy assesses the need for golf courses, and that no evidence had been prepared to demonstrate that the golf course facility is surplus to requirements to address paragraph 97a of the NPPF.

Sport England put forward the case that the PPS identifies shortfalls of provision to meet quantitative needs for football (including 3G artificial grass pitches) and rugby union, both now and in the future to

take into account population growth where existing shortfalls of provision are maintained and exacerbated.

Sport England set out that the site adjoins existing playing fields and that the site provides potential for additional playing field provision to make a positive contribution to addressing identified needs set out in the PPS (in the event that the golf course was demonstrated to be surplus to requirements).

Sport England recommend the amendment of Policy AM8G and AM30.29 relating to allocation LI/12 to include provision within the plan for appropriate mitigation 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.

Policy AM33.21 Minster Road Outdoor Sports Area – Sport England has previously objected to Policy 33.20 and the associated reasoned justification in para 33.39 relating to Minster Road Outdoor Sports Area, explaining that whilst Sport England welcomes that the policy encourages proposals to further develop outdoor sports facilities at the site, the policy did not sufficiently set out how this will be achieved, and did not provide appropriate reference to the Council's Playing Pitch Strategy (PPS) and Built Sports Facilities Strategy (BFS). Modifications were recommended to address this point.

The 2019 pre-submission draft has addressed this point by including additional text to policy AM33.21 and the associated reasoned justification in para AM33.40 to set out that proposals will be delivered via developer contributions and other funding sources in accordance with PPS and BFS. Sport England therefore wishes to remove its objection as its concerns have now been addressed.

Policy AM10.7 and Table AM10.0.1 Employment Allocation Sites – Sport England previously objected to Policy 10A, and associated table 10.0.1 in respect of proposed employment allocation LI/12 (Former Clubhouse at Burlish Golf Course). It is noted that AM10.7 (and the associated table AM10.0.1) have been amended to delete this proposed employment allocation, which have been replaced by LI/10 and LI/13. Sport England has no objection to this amendment as the replacement employment sites do not involve the loss of an existing sports facility.

Worcestershire Regulatory Services

Worcestershire Regulatory Services have reviewed the Wyre Forest District Local Plan Review Pre-Submission Publication consultation and have no adverse comments to make.

Worcestershire County Council – Place Partnership

WCC Place Partnership has made the following comments:-

Policy 30 and 30.20 – Policy 30 and 30.20 allocate the Sion Hill School site (WFR/WC/18) for 56 dwellings (C3) – this continues to be supported by Worcestershire County Council. However, the land subject to the above secured planning permission in June 2019 for 56 residential units of mixed tenure and scale (18/0529/FULL). The representation for Place Partnership has identified the land adjoining the eastern boundary of site WFR/WC/18 as also available for residential dwellings. WCC refer to this site as 'Sion Hill Phase 2'. Sion Hill Phase 2 is the remaining part of the playing field. Accordingly, WCC would like to request that it be released from the Green Belt and allocated for an indicative total of 60 residential dwellings (C3). WCC request that the following modifications are made to the Local Plan:

- Sion Hill School site (WFR/WC/18) be renamed 'Sion Hill Phase 1 (WFR/WC/18) throughout the Local Plan.
- New allocation added to Table 30.0.1 of Policy 30 for 60 dwellings (C3) are referred to as 'Sion Hill Phase 2'.

The Coal Authority

The Coal Authority has confirmed that they have no additional comments to make.

National Grid

The National Grid has confirmed that they have no comments to make in response to the WFDC Local Plan consultation.

4b) Wyre Forest Parish and Town Councils – Key Issues

The following gives a summary of the key issues raised by the Parish and Town Councils:

Wolverley and Cookley Parish Council

Wolverley and Cookley Parish Council had previously voted in support of the Wyre Forest District Local Plan review Pre-Submission Publication for the 2018 consultation. However, for the 2019 consultation they have changed their position and are now objecting to any development on Green Belt within their Parish, including that around the Lea Castle Hospital site. Wolverley & Cookley Parish Council are very concerned about the impact on the local infrastructure. They support the development on the PDL part of the former Lea Castle Hospital site (development for 600 homes), but do not support the development of the wider site (the additional 800 homes).

Kidderminster Foreign Parish Council

Kidderminster Foreign Parish Council objects to the proposed site allocation WA/KF/3 Land at Low Habberley for residential use. Their reasons for objection are as follows:-

- Lack of publication in 2018 consultation.
- The reasoning as to why site WA/KF/3 has been allocated is unsound.
- The site is not particularly close to shops.
- The current road already creates a defensible Green Belt boundary.
- The Parish Council fails to see how a development of 120 houses is going to add to biodiversity in terms of biodiversity net-gain.

Churchill and Blakedown Parish Council

Churchill and Blakedown Parish Council object to the proposed amendment to the Wyre Forest District Local Plan Pre-Submission Publication document, as it includes site policy 36.6A related to land off Station Drive, Blakedown. The Parish Council consider the plan to be unsound as they claim there is no justification for the loss of Green Belt. They consider the plan is not justified in that its inclusion of the site means that the plan fails to represent an appropriate strategy which has taken into account the reasonable alternatives, and it is not based on proportionate evidence. They have submitted a detailed response explaining their reasons for objection.

Rock Parish Council

Rock Parish Council object to the Local Plan for the inclusion of the Lem Hill Nursery site (BR/RO/2). The Parish Council thinks the site is completely outside the Far Forest Settlement Boundary which should be respected. The objection includes the following reasons:

- The site has poor access off the busy A4117 with no street lighting existing at Far Forest.
- The current nursery land suffers from surface water flooding in bad weather.
- 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 outside of the parish boundary. 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 surgeries and dentist practices in both Bewdley and Cleobury.
- Highways is a major concern to the Parish Council as the access off the current A4117 is within the 40mph zone.
- Currently there is inadequate bus provision for a village the size of Far Forest.

4c) Parish Councils outside of Wyre Forest District – Key Issues

The following gives a summary of the key issues raised by Parish Councils outside of Wyre Forest District:

Hagley Parish Council

Hagley Parish Council welcomes the provision of a large station car park at Blakedown railway station. The car park at Stourbridge Junction has become inadequate. The car park at Hagley railway station is also inadequate. However, Hagley Parish Council object to the housing element of the scheme, as they do not believe that there is a local need for 50 houses arising from a village as small as Blakedown or local employment to sustain so many. Development in A456 corridor is only likely to increase traffic on that road which is already being used at peak time beyond its capacity. Furthermore, Hagley Parish Council do not consider that the option of providing a large car park at Kidderminster Station has been adequately explored.

The amendments to the Local Plan has not removed the objections from Hagley Parish Council to the strategy of building east and north of Kidderminster, which will increase traffic on the A456.

4d) Other Non-Resident Representations – Key Issues

The following gives a summary of the key issues raised by other non-resident representations:

Worcestershire Wildlife Trust

Worcestershire Wildlife Trust (WWT) has made the following comments:

Policy AM30.30 Land off Zortech Avenue (LI/13) – WWT are particularly pleased to note the commentary set out in Part 3 of this policy and consider that the wording around delivery of biodiversity net-gain and appropriate landscape buffering to the nearby nature reserve is critical to

ensuring that the policy is both sound and consistent with national policy (see paragraphs 170, 171 and 175 of the National Planning Policy Framework (NPPF)).

Policy AM30.31 South Kidderminster Enterprise Park (SKEP) – WWT note the contents of this important policy and are pleased to support sub-sections 3 and 4 in particular. WWT consider that these elements of the policy are essential to delivering sustainable development of the SKEP that pays appropriate regard to the important nearby designated sites. However, WWT are concerned that the current wording of the policy may be taken to suggest council support for development of the Settling Ponds (previously listed as FPH/1 – Former British Sugar Settling Ponds, Wilden Lane, Kidderminster). WWT support the deletion of this site from the plan during previous rounds of consultation.

FPH/1 partially overlays Wilden Marsh & Meadows SSSI and development here would be contrary to the Nature Recovery Network approach advocated in the Government's Emerging 25-year Environment Plan (which seeks to not only protect but also reconnect existing high value sites) and may pose a direct threat to the SSSI itself. This suggests to WWT that the policy is currently not in conformity with national planning policy (in particular NPPF paras 170, 171 and 175). This is especially so as WWT note that the council has already allocated sufficient land for employment development elsewhere in the district.

WWT recommend amending the policies map by removing the SKEP annotation from Wilden Marsh and Meadows SSSI and the adjacent site 'FPH/1 – Former British Sugar Settling Ponds, Wilden Lane, Kidderminster'. In addition, WWT recommend that the wording of para 30.74 is amended to reflect their comments above.

Policy 33.6 Yew Tree Walk (AKR/18) – WWT are pleased to support the removal of site AKR/18 Yew Tree Walk for the reasons set out in their previous submissions to the Local Plan consultation in 2018.

Policy AM36.11 Land off Station Drive, Blakedown (WFR/BC/3) - WWT note that this site falls adjacent to a Local Wildlife Site and that there are a number of important ecological receptors both within and near to the boundaries. With that in mind we are pleased to support sub-sections 2, 5 and 6, which relate to the protection and buffering of these features. WWT consider that these sections are key to making the policy consistent with national policy and in particular NPPF paras 170, 171 and 175.

Canal and River Trust

The Canal and River Trust has made the following comments:-

Policy 33.2 Cheapside (AKR/2) – The Canal and River Trust note the allocation of this former manufacturing site within the Stourport-on-Severn No. 1 Conservation Area. The character of this Conservation Area was formed by the construction of a group of canal basins from the late eighteenth century, many of which still exist and form the southern part of the historic core of the town. One such basin existed in the area bordered by Cheapside, the River Severn and the Angel Public House but has since been infilled. As acknowledged within the policy wording, parts of the basin, including the retaining walls, exist to this day. The Canal and River Trust welcome the inclusion of Point 5 of Policy 33.2 which notes the need for proposals to preserve or enhance the character of the Conservation Area, but feel this is partially undermined by the wording of point 7 which notes that future proposals should only 'aim' to retain the most significant surviving elements of the former canal basin. The Trust

believe that point 7 does not go far enough in requiring proposals to consider the positive contribution made by the remnants of the basin to the Conservation Area as required by the NPPF (Para 201). The Trust therefore consider the policy should carry an expectation that the remaining remnants of the historic basin would be retained, placing the onus on developers to assess the level of harm to the Conservation Area and, if applicable, show how this is outweighed by the public benefits.

Policy 30.9 Churchfields (BW/1) – The eastern edge of the site is located close to the Staffordshire and Worcestershire Canal. The Canal and River Trust welcome the wording within the policy for proposals to reflect and complement the existing character and quality of the historic environment adjacent to the canal. The Trust notes that point 11 refers to the provision for ‘improvements to pedestrian links into the town centre and out into the surrounding countryside’. The Trust feels that the aims of this point could usefully be expanded upon within the policy’s Reasoned Justification to include specific reference to the canal towpath as a link for pedestrian and cyclists, a connection that could be promoted with the addition of appropriate signage and waymarking.

Policy 27E – The Canal and River Trust is supportive of Policy 27E and the need for development to respond to its canalside setting. The policy states however that development ‘must’ provide a strong active frontage. Whilst as a principle for development this is supported it should be recognised that there may be instances where this is not appropriate, such as where existing landscaping needs to be retained or dominant buildings are better when visually screened. Developments should take account of the current setting/character of the specific site and surroundings and respond accordingly. This should be reflected in the policy.

Policy 27E refers to the improvement of the towpath, appropriate to the urban area through which the canal passes. The canal however also passes through rural areas and any improvements to the towpath need to be appropriate for the use, setting and character of the canal corridor. This should be reflected in the policy. The Canal and River Trust have suggested a modification to the policy.

Policy 30.6 Timber Yard, Park Lane (BHS/16) – The site fronts on to the Staffordshire and Worcestershire Canal. The Canal and River Trust welcome the policy wording that identifies the need for proposals to create a high quality pedestrian canalside environment and public realm. Point 4 indicates that proposals should ‘Deliver a new landmark pedestrian bridge over the canal to Weavers Wharf’. As landowner and navigation authority for the Staffordshire and Worcestershire Canal at this point, the Trust would like to highlight that any such bridge would require the Canal and River Trust’s prior agreement. In addition, any new bridge would inevitably interact with the canal towpath on the eastern bank of the canal and would require the addition of adequate signage to ensure a clear and legible route for pedestrians and cyclists, which should be considered as part of any proposal. The Trust believes this is necessary to achieve a safe and accessible environment alongside the waterway in line with paragraph 91b of the NPPF. The Trust has therefore suggested a number of minor modifications that they consider necessary to aid clarity and to assist in the sustainable development.

4e) Petitions and Residents Groups – Key Issues

A total of 7 responses from resident groups were submitted to the Council in relation to the plan. The petitions and resident group responses submitted are shown in the table below and include the site it is in relation to.

Petition / Resident Group	Sites	Details
Burlish Concerned Residents	(LI/11) Land west of former schools site Coniston Crescent. (MI/38) School site Coniston Crescent.	No signatures. Residents group consists of 81 residential addresses.
Cookley and Caunsall Neighbourhood Plan Group	<ul style="list-style-type: none"> Lea Castle Village (WFR/WC/32/33/34) (WFR/WC/12) Lawnswood. (WFR/WC/10) Land off Kimberley Avenue. 	The NP group are currently working on their first draft neighbourhood plan for the area of Cookley and Caunsall.
Friends of Patricks Field (Petition)	Yew Tree Walk (AKR/18)	193 signatures.
Offmore Comberton Action Group	East of Kidderminster Extension	No signatures. Response submitted by Cllr Alan Totty on behalf of action group.
Wyre Forest Community Land Trust	Lea Castle Village	CLT group formed in 2019.
Stop Lea Castle Farm Quarry Action Group	Does not refer to a Local Plan site allocation.	No signatures. The action group represents a group of residents located in the Parish of Wolverley and Cookley.
Dunley Park Residents	Pearl Lane, Areley Kings (AKR14)	46 names and addresses. Submitted by Derek Duggan.

The following gives a summary of the key issues raised by the petitions and resident group responses received:

Burlish Concerned Residents – Key issues:

LI/11 – Land west of former school site Coniston Crescent

- This land was removed from Green Belt without proper public consultation and specifically without consulting residents of Burlish Park Estate who are most affected by this land re-categorisation. It is not the only former Green Belt land included in the Local Plan but it is by far the largest site in Stourport to be downgraded.
- Traffic pressures resulting from vehicles associated with 200 houses here would be unacceptable given the nature of the roads and junctions serving the site. The road infrastructure is inadequate to cope with the extra traffic associated with hundreds of additional houses. The wholly inadequate vehicular access is proposed to be via Buggy Lane/Kingsway and would either join the Stourport Road or have to go via Burlish Crossing, both of which are pinch points. There are also two schools and a sixth form all contributing both traffic and pedestrians to the transport overload twice a day during term-time.
- Developing this site would further undermine the distinct ‘three towns’ character of Wyre Forest which has been eroded recently with the building of Zortech, Wyre Forest House, Finepoint and the Crematorium.

- Many older residents remember returning German bombers dropping their unused ordnance over the land at LI/11 describing at least one bomb not exploding on impact and, to the best of their knowledge, it remains on the site to this day.
- Site LI/11 should have its Green Belt status restored and any proposed future change of status should be the subject of proper public consultation.

MI/38 – School site Coniston Crescent:

- This site was restored to playing field quality/status as a quid-pro-quo condition of the planning consent 15/0583/OUTL “(6) *The existing sixth form block shall be demolished and completely removed from site and the site laid out for the provision of playing fields within three months of the date of first occupation of the replacement sixth form block. Reason: To ensure that the external appearance of the development is satisfactory and that it accords with Policies*”. The school should be compelled to comply with the requirements of the planning consent 15/0583/OUTL and restore the site to playing field status.
- Traffic pressures resulting from vehicles associated with 105 houses here would be unacceptable given the nature of the roads and junctions serving the site. The road infrastructure is inadequate to cope with the extra traffic associated with so many additional houses. The wholly inadequate vehicular access is proposed to be via Buggy Lane/Kingsway and would either join the Stourport Road or have to go via Burlish Crossing, both of which are pinch points. There are also two schools and a sixth form contributing both traffic and pedestrians to the transport overload twice a day during term-time.

Cookley and Causall Neighbourhood Plan Group – Key issues:

- (WFR/WC/12) Lawnswood House should remain within the Green Belt.
- The Cookley ADR site – Land off Kimberley Avenue (WFR/WC/10) should remain an ADR.
- (WFR/WC/32/33/34) – should remain as Green Belt to protect rural nature of Cookley and for the 600 houses already agreed for the Lea Castle hospital site.

Friends of Patricks Field (Petition) – Key issues:

The Friends of Patricks Field have submitted supplementary information relating to their comments made by the group to the public consultation in 2018.

- The group feel strongly that the omission of AKR/18 Land at Yew Tree Walk is the correct course of action based on their comments and information given to the 2018 version of the Local Plan consultation.
- In the 2018 consultation, the Friends of Patrick’s Field stated that they felt they had inadequate time to obtain full and final information on some of the matters addressed. The purpose of their submission for the 2019 consultation is to provide the Planning Inspector with further information to add to the relevant sections of their earlier submissions. Their submission includes updates relating to flora and fauna on the site and drainage information from Severn Trent.

Offmore Comberton Action Group – Key issues:

The action group have made the following comments:

- If the proposals for Blakedown Station go ahead then the proposed route through the east of Kidderminster extension will become an effective eastern by pass. If this happens the proposed junction with Husum Way just above its junction with Shakespeare Drive will be extremely dangerous and cause serious deterioration in quality of life for existing residents of Offmore. The Action Group believe that the only way to make the proposals safe is to construct an additional railway bridge to link the proposed traffic island at Husum Way/Birmingham Road Junction to the proposed 'spine road' through the proposed Kidderminster eastern extension.
- The group is pleased that some additional planting is proposed to the rear of the existing Offmore Estate but believe that this must be a minimum of 30 metres wide to protect the quality of life of existing residents.
- The development to the east of the existing Offmore estate fails to protect the wildlife, specifically nesting curlews, badgers, bats and foxes in that area and will destroy the historic irrigation system installed by the Earl of Dudley over 100 years ago and still functional.
- The 300 properties proposed on this site could be accommodated elsewhere in the District and the remaining 1000 properties proposed for Stone Hill North could have their Primary School needs adequately catered for by extensions at Offmore and Comberton Primary Schools.
- Residents of Offmore feel that it is completely wrong to load all the pressure on to the east of Kidderminster and believe that areas with access to the Wolverley Road have good access to the A449 north east of Kidderminster.

Wyre Forest Community Land Trust – Key issues:

- The vision for Lea Castle Village in Policy 31.1 is basic and limited in its aspiration and innovation towards local responsiveness. It merely outlines criteria for a large developer without any real consideration for smaller developers; community led housing initiatives or its place / association within the rural villages and in particular Cookley and Caunsall which are its nearest neighbours.
- Incorporation of a requirement for Self Build and Custom Build land to be provided within the development and encouragement for Community Led Housing initiatives would go some way to enhancing the proposal for local people and smaller developers.

Stop Lea Castle Farm Quarry Action Group – Key issues:

The 'Stop Lea Castle Farm Quarry Action Group' represents a group of residents located in the Parish of Wolverley and Cookley. The residents group are concerned about the possible quarry development at Lea Castle Farm site (*note: this is a different site to Lea Castle Village and is not an allocated site in Local Plan*). The residents group object to the Wyre Forest Local Plan because they think the plan should specifically identify the former Lea Castle Parkland as an area of unique, historic and special locally valued landscape. The Lea Castle Parkland (set within Lea Castle Farm) is generally defined by the Castle Wall. The resident group consider the parkland to have many demonstrable physical

attributes, fulfilling functions which elevate it above ordinary. The value of the landscape is also notable due to the heritage assets on the site including the Grade II listed Gatehouse and lodges. While locally listed the connected estate wall and Wolverley Lodge should be seen as structures which are ancillary to the listed building, built at the same time and as such should also be covered by the listing. The remaining avenue of trees linking the gatehouses to the site of the main house is covered by Tree Protection Order as are other trees within the parkland. The parkland also has a relationship with the Wolverley Conservation Area and Staffordshire and Worcestershire Canal Conservation Area. The residents group therefore think that the parkland should be recognised within the Local Plan as valued landscape. In addition, the parkland should be protected from any development that detracts from its natural or historic landscape.

Dunley Park Residents Group

The Dunley Park Residents Group oppose the development of fields on Pearl Lane, Areley Kings (AKR14) on the grounds of:

- Loss of habitats for wildlife
- Roman Remains
- Increase in air dioxins along Dunley Road
- More traffic congestion at Stourport bridge
- History of flooding
- Loss of walking areas
- Both Stourport and Kidderminster still have several areas of Brownfield land lying undeveloped
- Only 1 road in/out from Stourport and Kidderminster via bridge
- Traffic hold ups through Summer Fridays with Wobbley Wheel car boot sales on
- Area contains lots of elderly people/bungalows with open views (Quality of life issues)

5) Responses to Pre-Submission Publication Policies (2019 Consultation)

The following graphs show the number of responses received for each of the policies within the Pre-Submission Publication consultation document during the September / October 2019 consultation. Within those responses the graphs also show:

- Number that considered the plan to be Legally Compliant
- Number that considered the plan was not Legally Compliant
- Number that considered the plan to be Sound
- Number that considered the plan to be Unsound
- Number that considered the plan complied with the Duty to Cooperate
- Number that considered the plan did not comply with the Duty to Cooperate
- Number who proposed Modifications to the plan

Summaries of responses to each chapter of the document can be found at Appendix C. The full responses will be available to view on the [Council's website](#) when the plan is submitted to the Planning Inspectorate.

Chapters 1-4

These Chapters of the document did not contain any policies. The Chapters are:

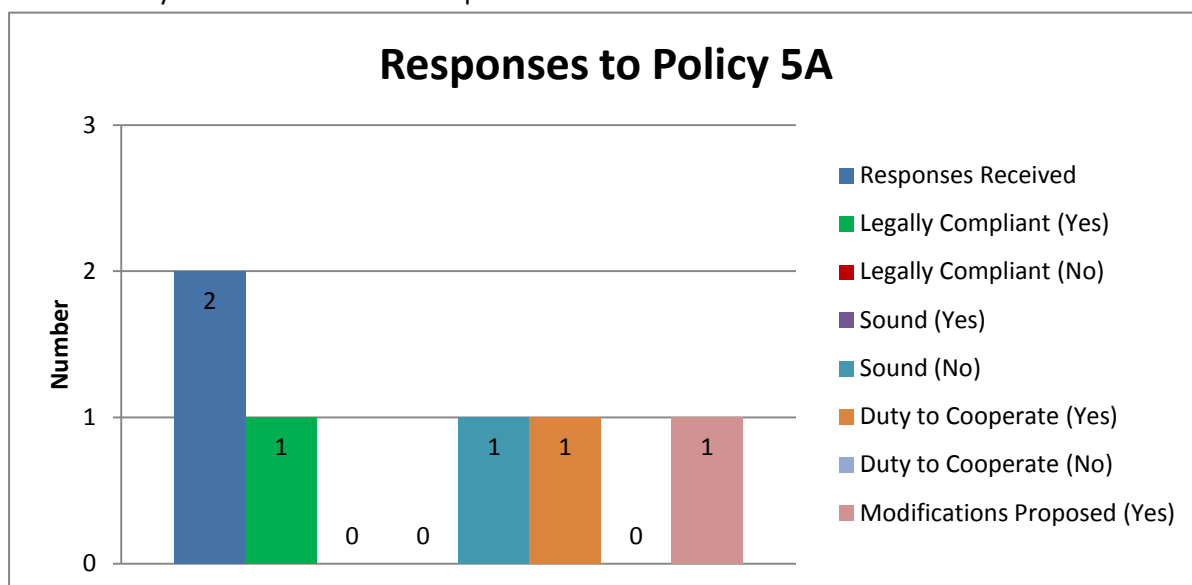
1. Introduction and Context
2. Key Issues and Challenges
3. Vision for the Area in 2036
4. Core Policies Introduction

A summary of the responses received for these chapters can be found at Appendix C of this document.

Chapter 5 - Overarching Sustainable Development Principles

The policies contained within this Chapter are:

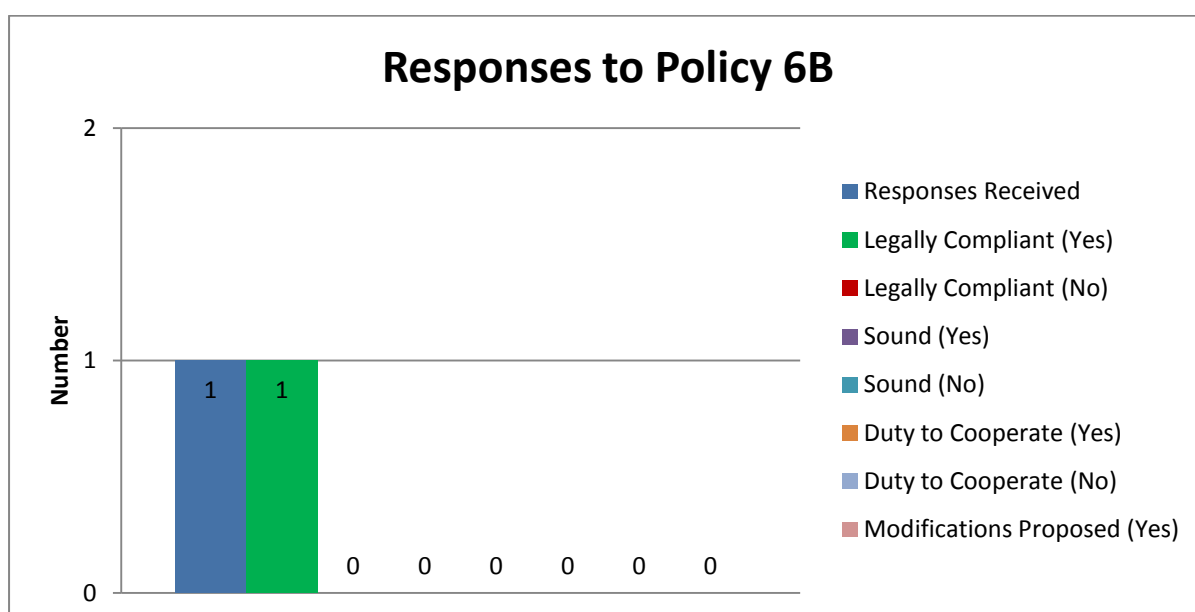
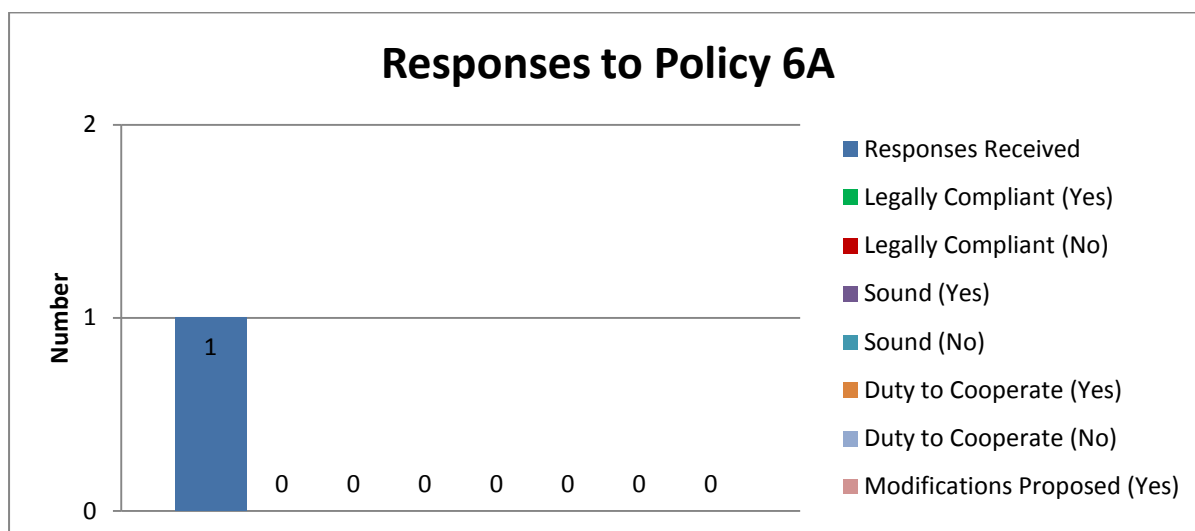
- Policy 5A – Sustainable Development



Chapter 6 – A Sustainable Future- Development Strategy

The policies contained within Chapter 6 are:

- Policy 6A - Development Needs 2016 - 2036
- Policy 6B - Locating New Development
- Policy 6C - Kidderminster town as the strategic centre of the District
- Policy 6D - Strategic Allocation Sites
- Policy 6E - Role of Stourport-on-Severn and Bewdley as Market Towns
- Policy 6F - Role of the villages and rural areas

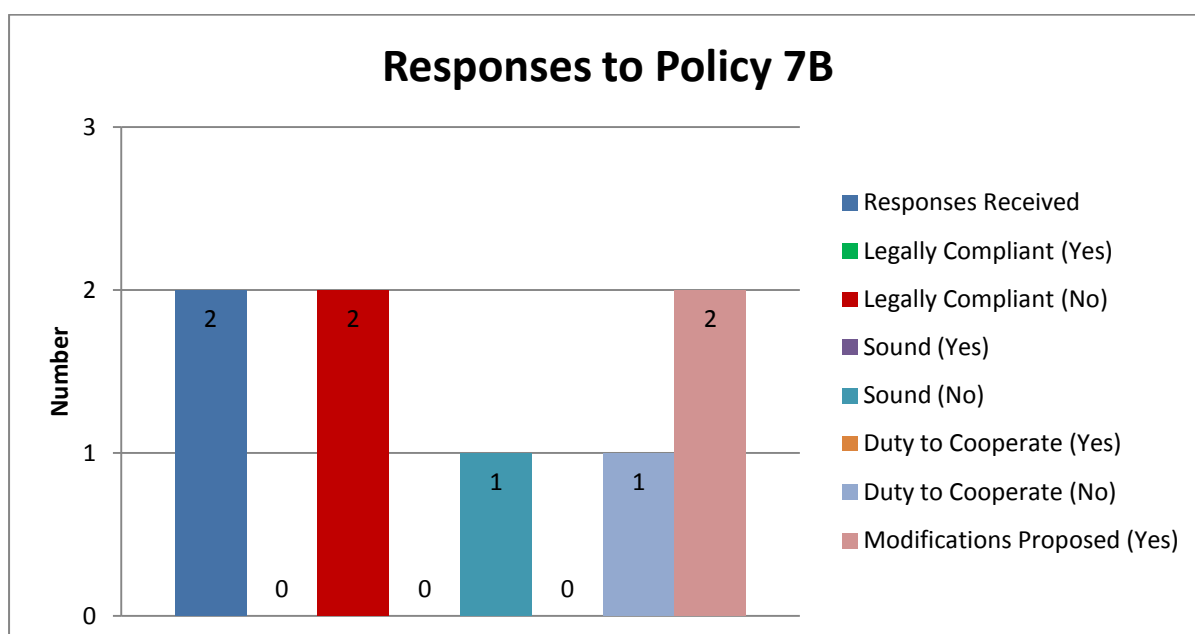
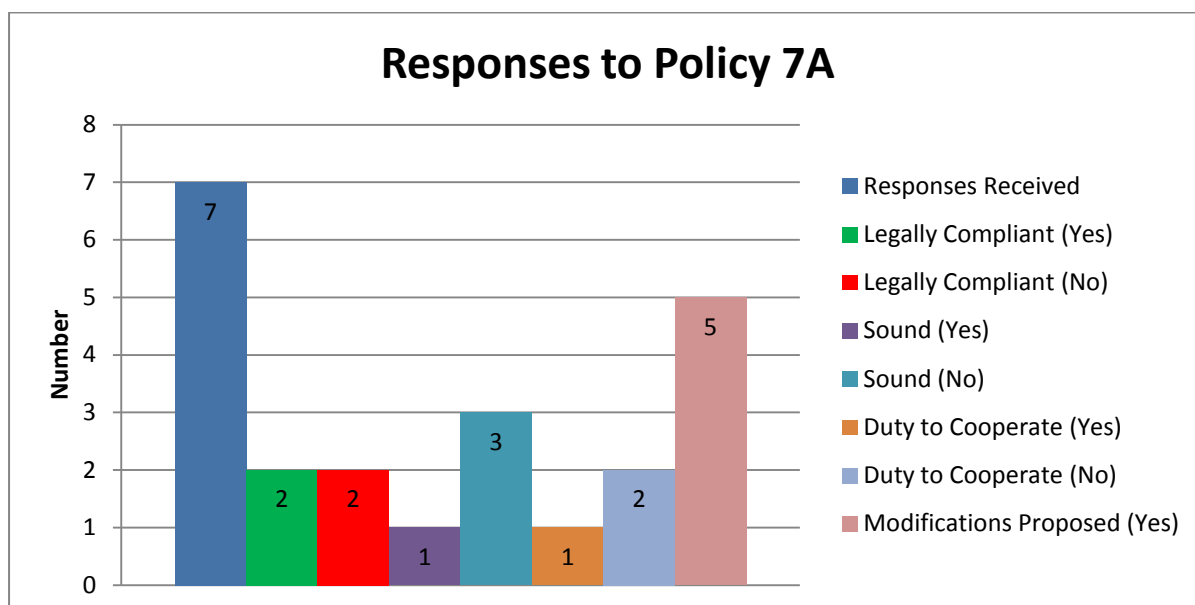


There were no responses for Policy 6C - Kidderminster town as the strategic centre of the District, Policy 6D - Strategic Allocation Sites, Policy 6E - Role of Stourport-on-Severn and Bewdley as Market Towns and Policy 6F - Role of the villages and rural areas.

Chapter 7 – Strategic Green Belt Review

The policies contained within Chapter 7 are:

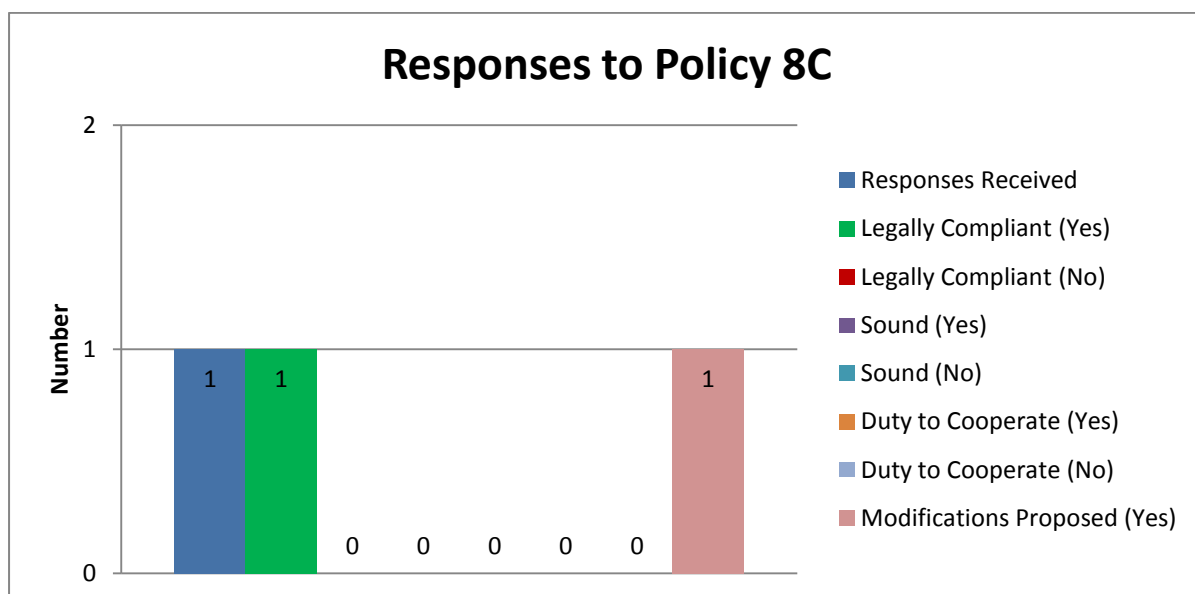
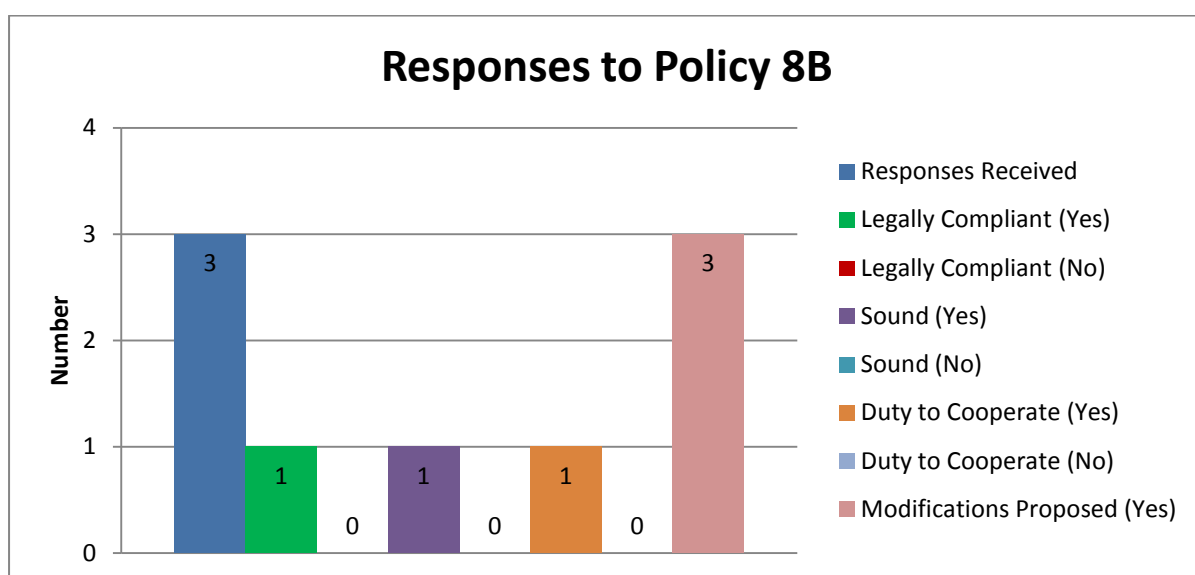
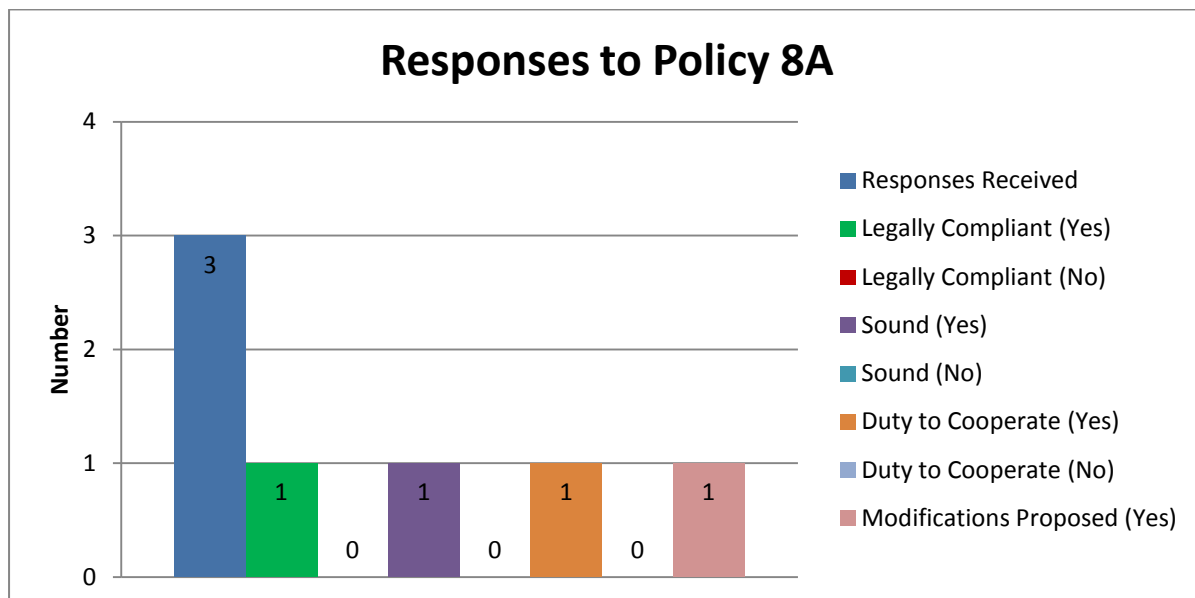
- Policy 7A - Strategic Green Belt Review
- Policy 7B - Reserved Housing Sites in the Green Belt

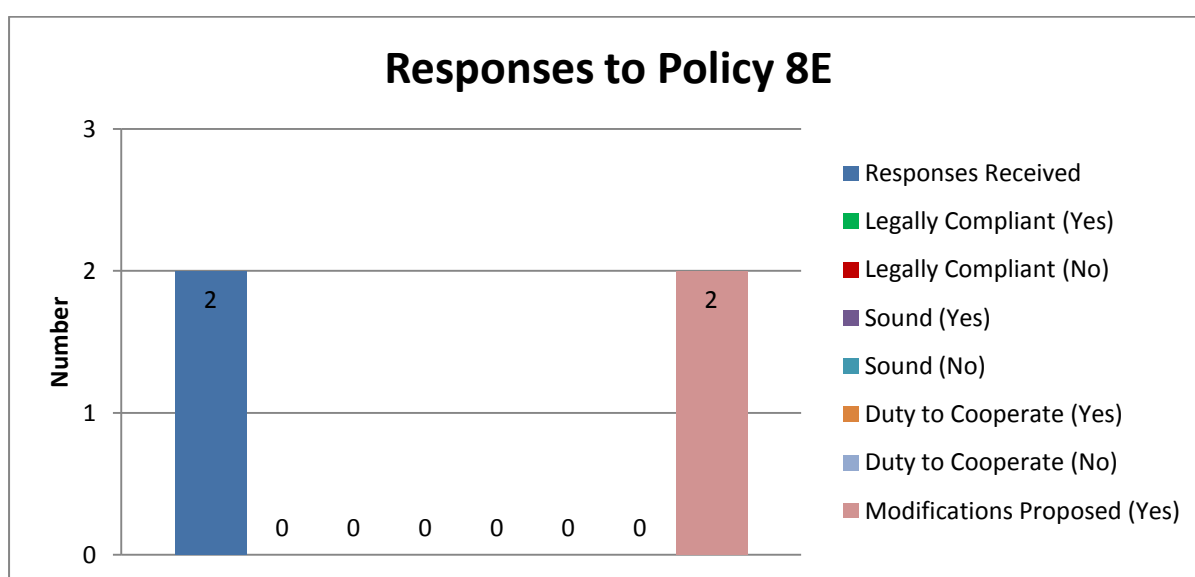
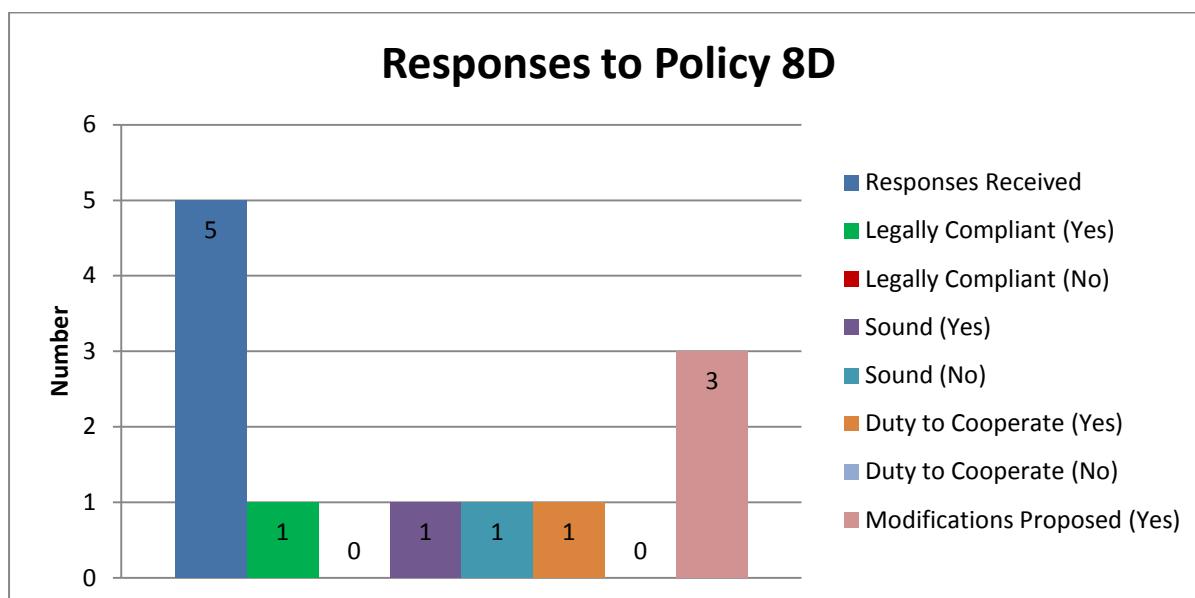


Chapter 8 – A Desirable Place to Live

The policies contained within Chapter 8 are:

- Policy 8A - Housing Density & Mix
- Policy 8B - Affordable Housing Provision
- Policy 8C - Addressing Rural Housing Needs
- Policy 8D - Self Build and Custom Housing
- Policy 8E - Housing for Older People and others with special housing requirements
- Policy 8F - Gypsy and Traveller Site Provision
- Policy 8G - Site Provision for Travelling Showpeople



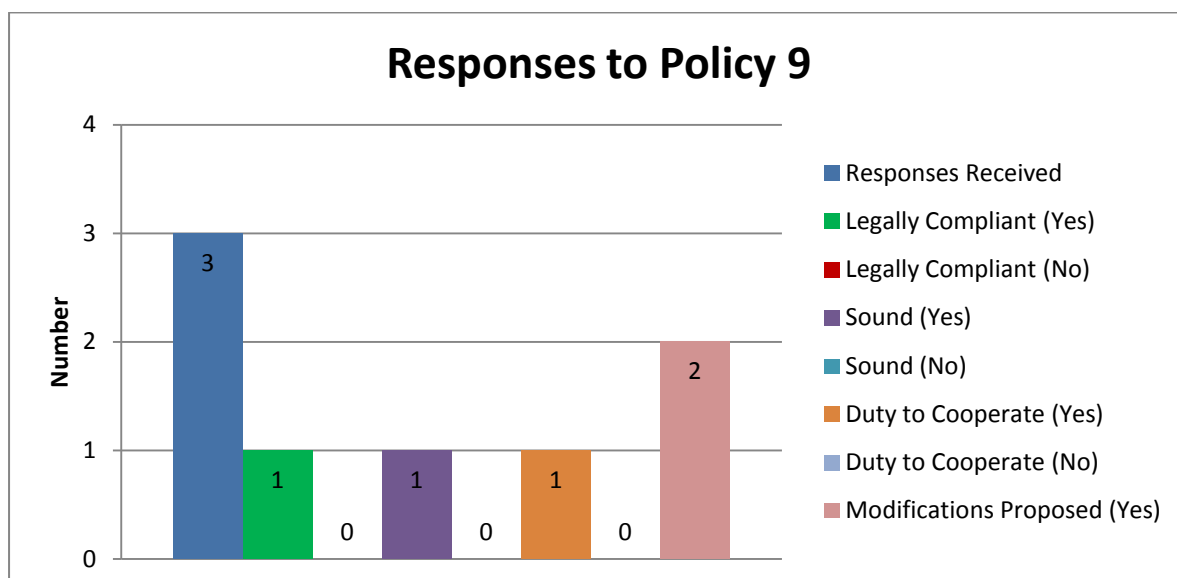


There were no responses for Policy 8F - Gypsy and Traveller Site Provision or Policy 8G - Site Provision for Travelling Showpeople.

Chapter 9 – Health and wellbeing

The policies contained within Chapter 9 are:

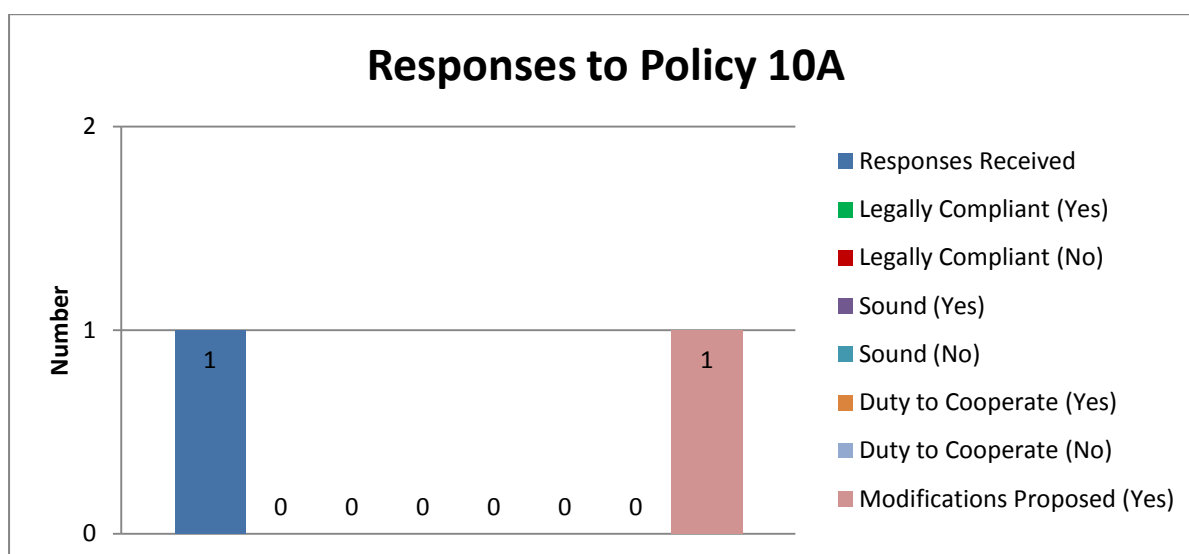
- Policy 9 Health and Wellbeing



Chapter 10 – A Good Place to do Business

The policies contained within Chapter 10 are:

- Policy 10A - A Diverse Local Economy
- Policy 10B - Town Centre Development
- Policy 10C - Sustainable Tourism



There were no responses for Policy 10B - Town Centre Development and Policy 10C - Sustainable Tourism.

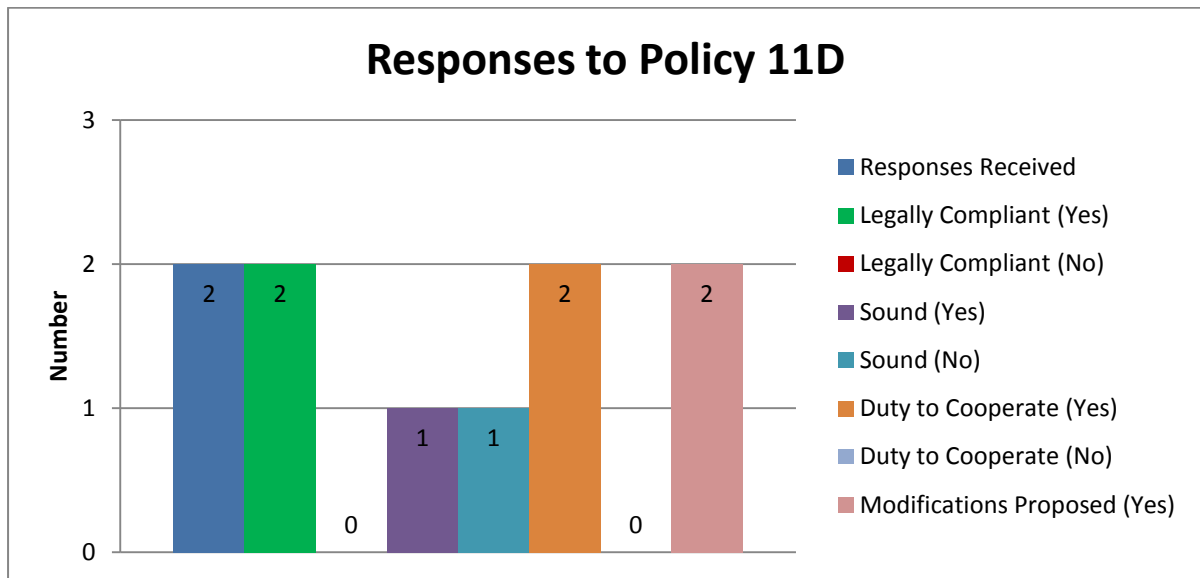
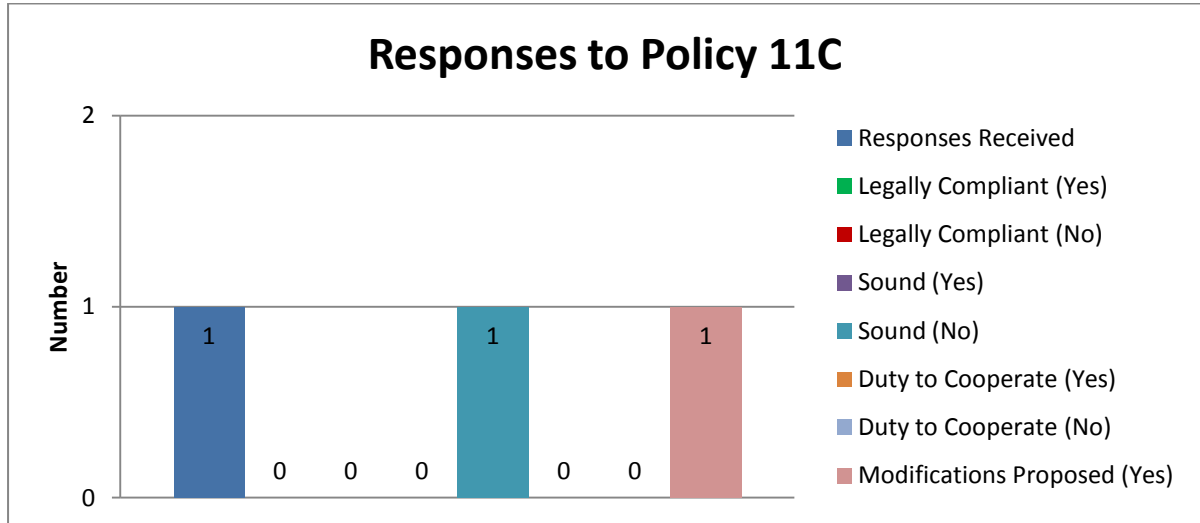
Chapter 11 – A Unique Place

The policies contained within Chapter 11 are:

- Policy 11A - Quality Design and Local Distinctiveness
- Policy 11B - Historic Environment
- Policy 11C - Landscape Character

- Policy 11D - Protecting and Enhancing Biodiversity
- Policy 11E - Protecting and Enhancing Geodiversity
- Policy 11F - Regenerating the Waterways

There were no responses for Policy 11A - Quality Design and Local Distinctiveness and Policy 11B - Historic Environment.

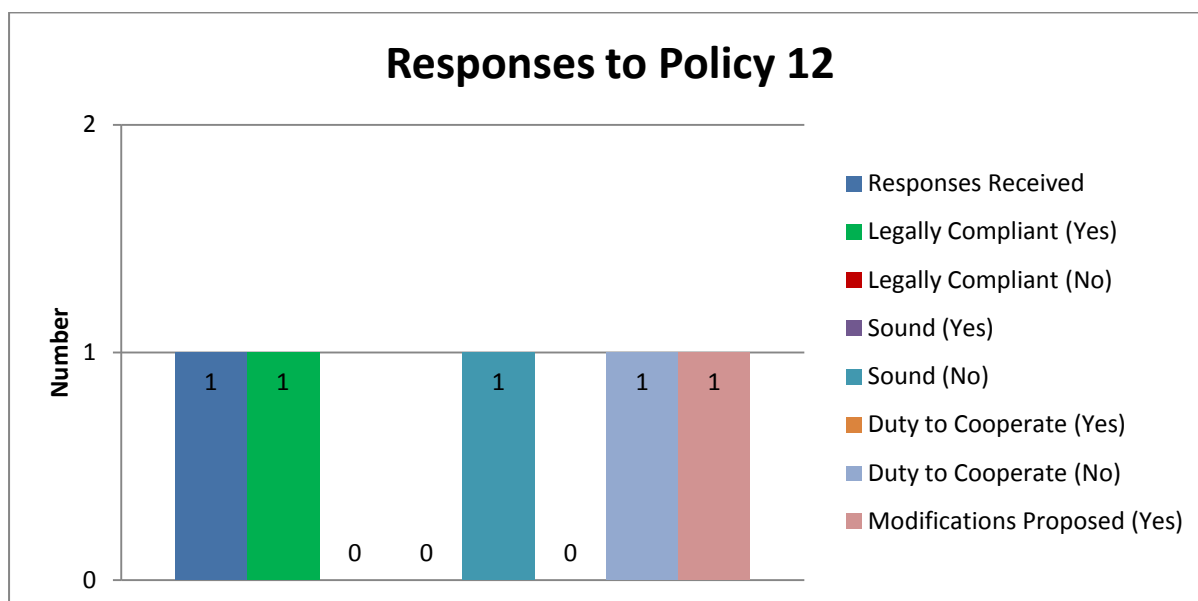


There were no responses for Policy 11E - Protecting and Enhancing Geodiversity and Policy 11F - Regenerating the Waterways

Chapter 12 – Strategic Infrastructure

The policies contained within Chapter 12 are:

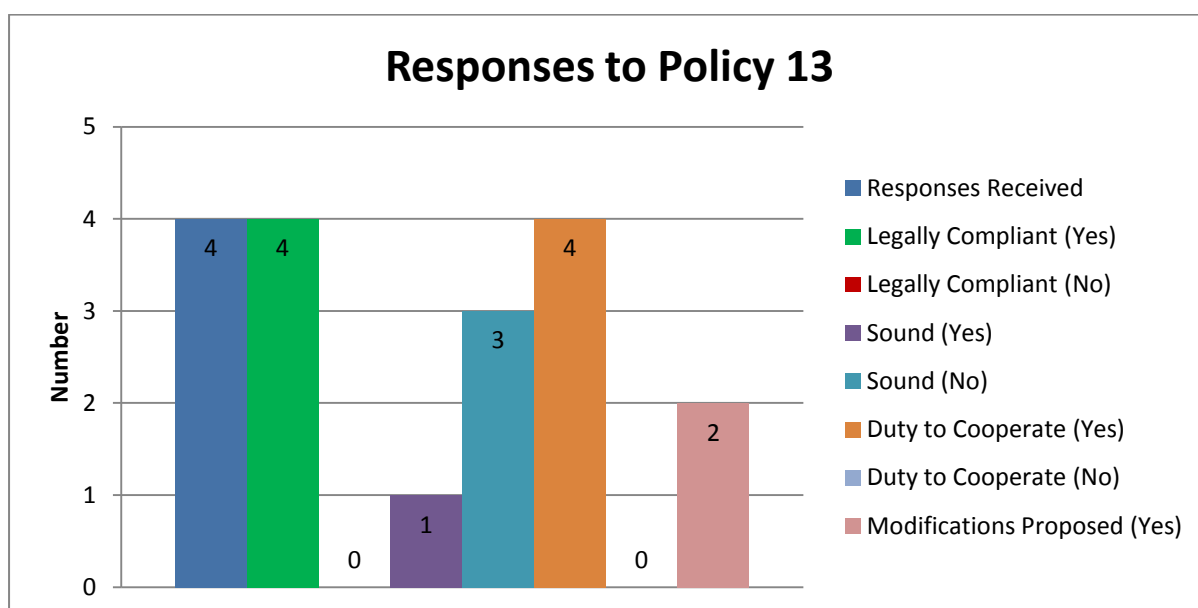
- Policy 12 - Strategic Infrastructure



Chapter 13 – Transport and Accessibility

The policies contained within Chapter 13 are:

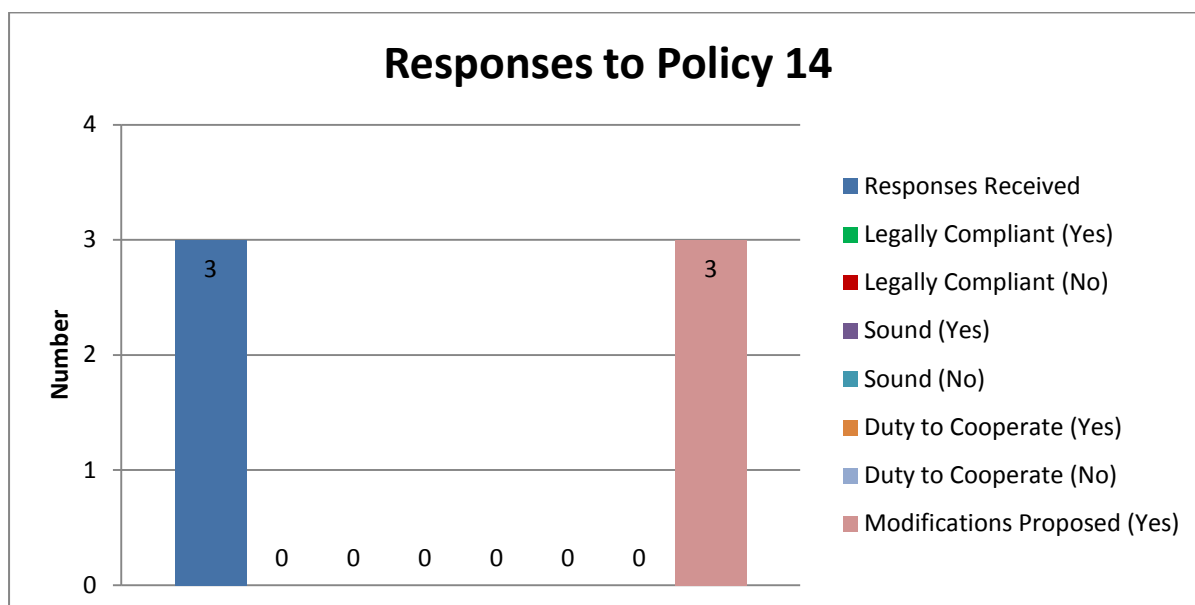
- Policy 13 - Transport and Accessibility in Wyre Forest



Chapter 14 – Strategic Green Infrastructure

The policies contained within Chapter 14 are:

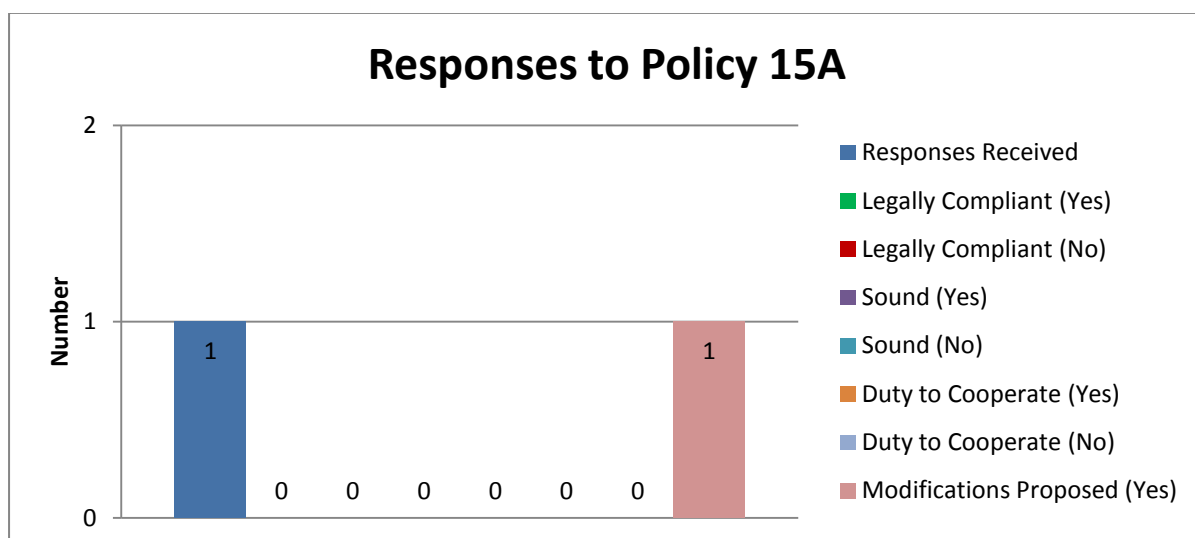
- Policy 14 - Strategic Green Infrastructure



Chapter 15 – Water Management

The policies contained within Chapter 15 are:

- Policy 15A - Water Conservation and Efficiency
- Policy 15B - Sewerage Systems and Water Quality
- Policy 15C - Flood Risk Management
- Policy 15D - Sustainable Drainage Systems (SuDS)



There were no responses for Policy 15B - Sewerage Systems and Water Quality, Policy 15C - Flood Risk Management and Policy 15D - Sustainable Drainage Systems (SuDS).

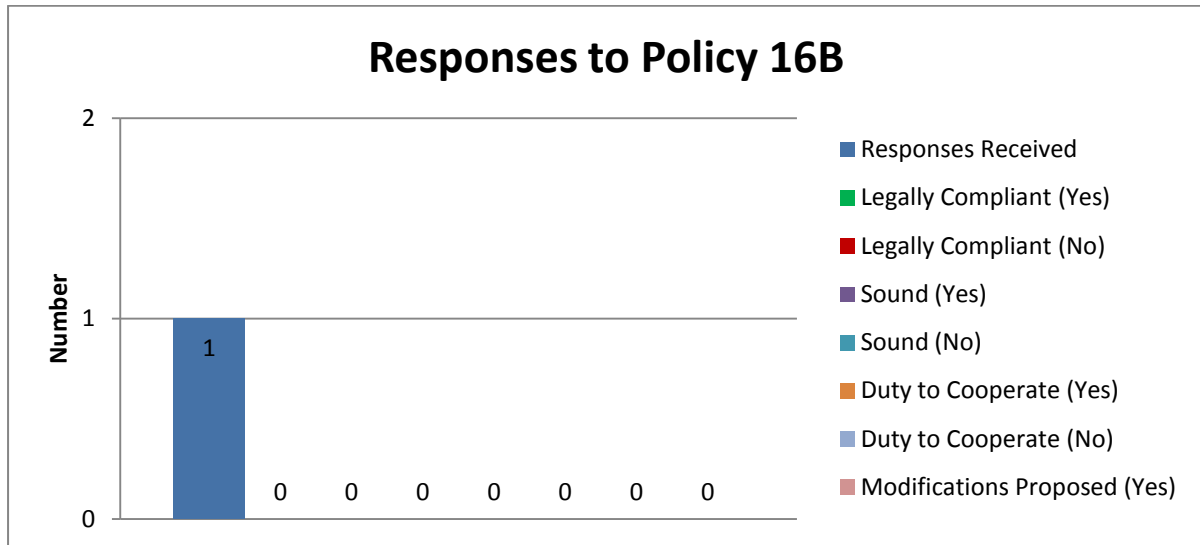
Chapter 16 – Pollution, Minerals and Waste

The policies contained within Chapter 16 are:

- Policy 16A - Pollution and Land Instability
- Policy 16B – Minerals

- Policy 16C – Waste

There were no responses for Policy 16A - Pollution and Land Instability.



There were no responses for Policy 16C – Waste.

Chapter 17 – Development Management Introduction

There are no policies in Chapter 17.

Chapter 18 – A Desirable Place to Live

The policies contained within Chapter 18 are:

- Policy 18A - Financial Viability
- Policy 18B - Residential Infill Development
- Policy 18C - Flat Conversions
- Policy 18D - Residential Caravans and Mobile Homes

There were no responses for any of the policies in Chapter 18.

Chapter 19 – Providing Accommodation for Gypsies, Travellers and Travelling Showpeople

The policies contained within Chapter 19 are:

- Policy 19 - Site Standards for Gypsies, Travellers and Travelling Showpeople

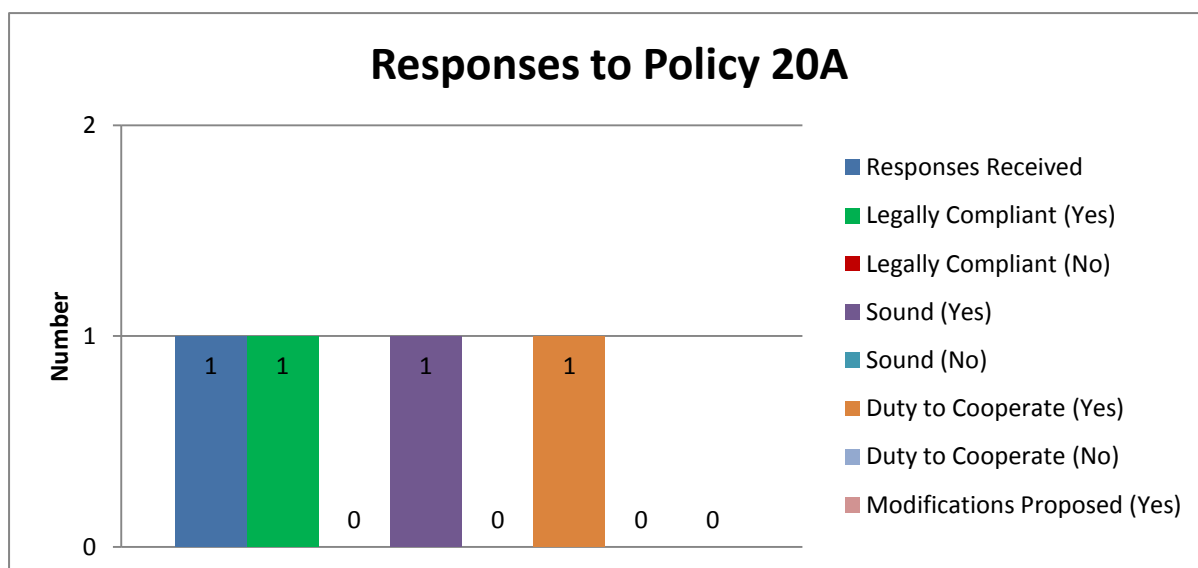
There were no responses for this policy.

Chapter 20 – Community Facilities

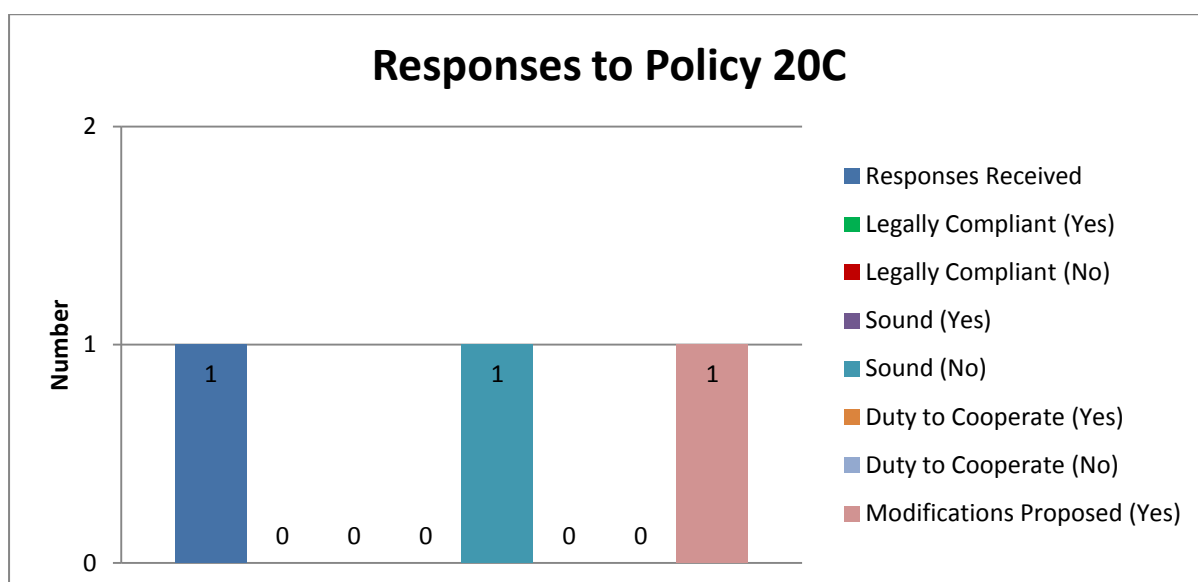
The policies contained within Chapter 20 are:

- Policy 20A - Community Facilities
- Policy 20B - Open Space

- Policy 20C - Provision for Open Space, Sports Pitches and Outdoor Community Uses in Housing Development



There were no responses for Policy 20B - Open Space.



Chapter 21 – Employment Land

The policies contained within Chapter 21 are:

- Policy 21A - Economic Development
- Policy 21B - Rural Employment
- Policy 21C - Live Work Units
- Policy 21D – Offices

There were no responses for any of the policies in Chapter 21.

Chapter 22 – Town Centre Development and Retail

The policies contained within Chapter 22 are:

- Policy 22A - Town Centre development
- Policy 22B - Edge of Centre and Out of Town development
- Policy 22C - Change of use from retail to alternative uses in local centres
- Policy 22D - Local Shops
- Policy 22E - Specialist Retailing
- Policy 22F - Food and Drink Retailing
- Policy 22G Hot Food Takeaways

There were no responses for any of the policies in Chapter 22.

Chapter 23 – Sustainable Tourism

The policies contained within Chapter 23 are:

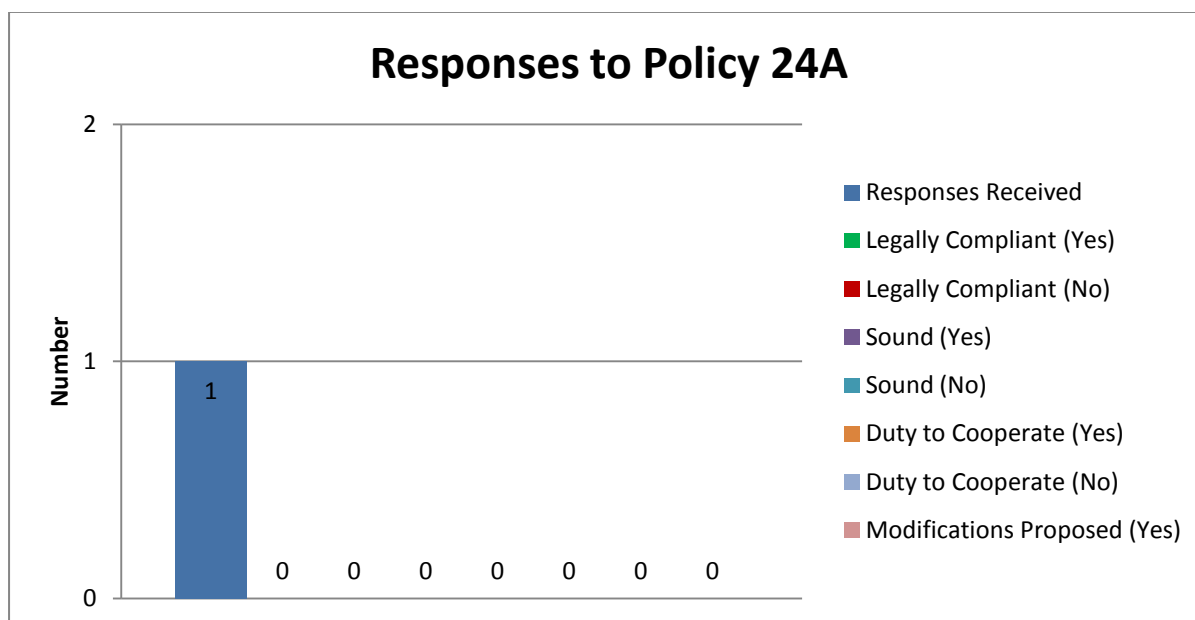
- Policy 23A - Supporting Major Tourist Attractions
- Policy 23B - Supporting Tourist Attractions
- Policy 23C - Tourist Accommodation

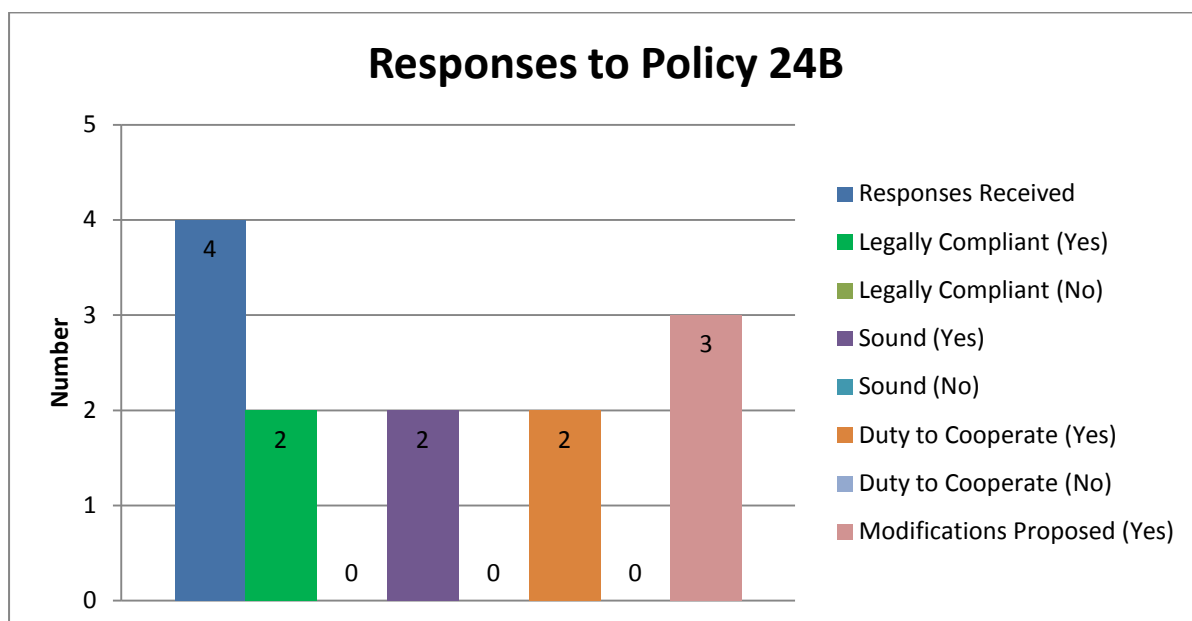
There were no responses for any of the policies in Chapter 23.

Chapter 24 – Telecommunications and Renewable Energy

The policies contained within Chapter 24 are:

- Policy 24A - Telecommunications and Broadband
- Policy 24B - Renewable and Low Carbon Energy

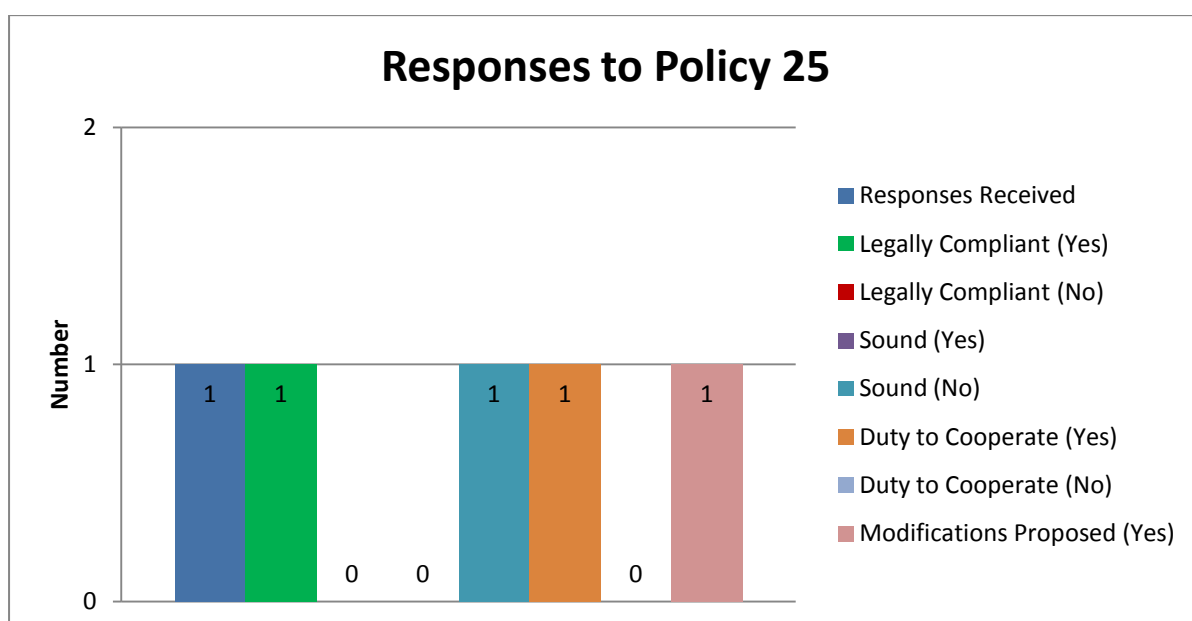




Chapter 25 – Safeguarding the Green Belt

The policies contained within Chapter 25 are:

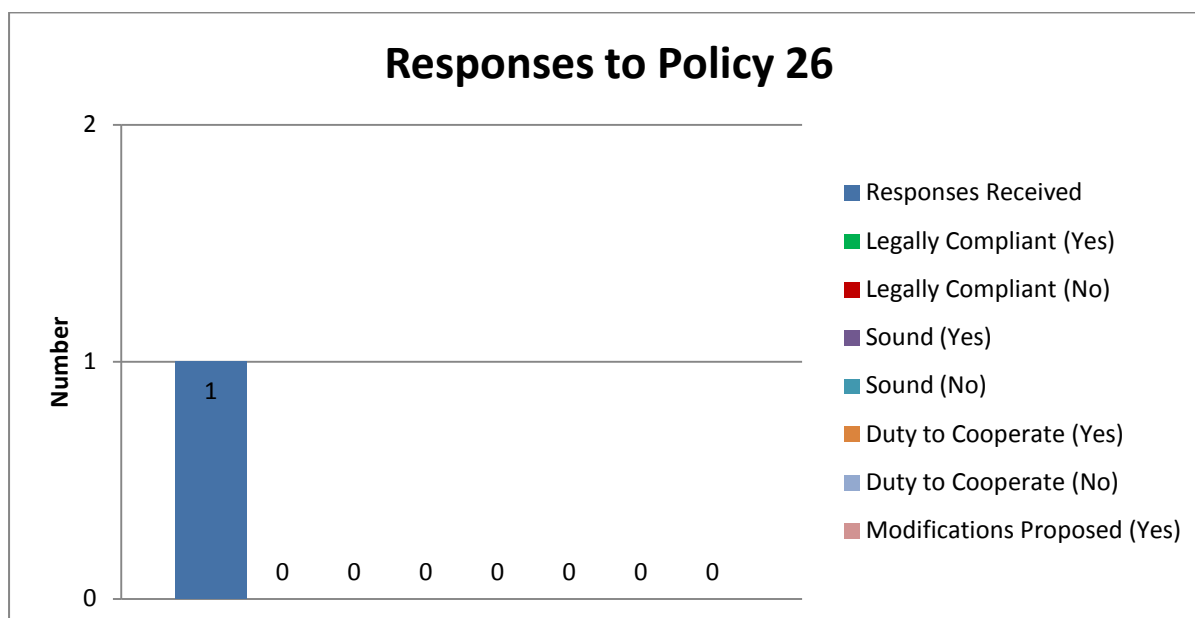
- Policy 25 - Safeguarding the Green Belt



Chapter 26 – Safeguarding the Historic Environment

The policies contained within Chapter 26 are:

- Policy 26 - Safeguarding the Historic Environment

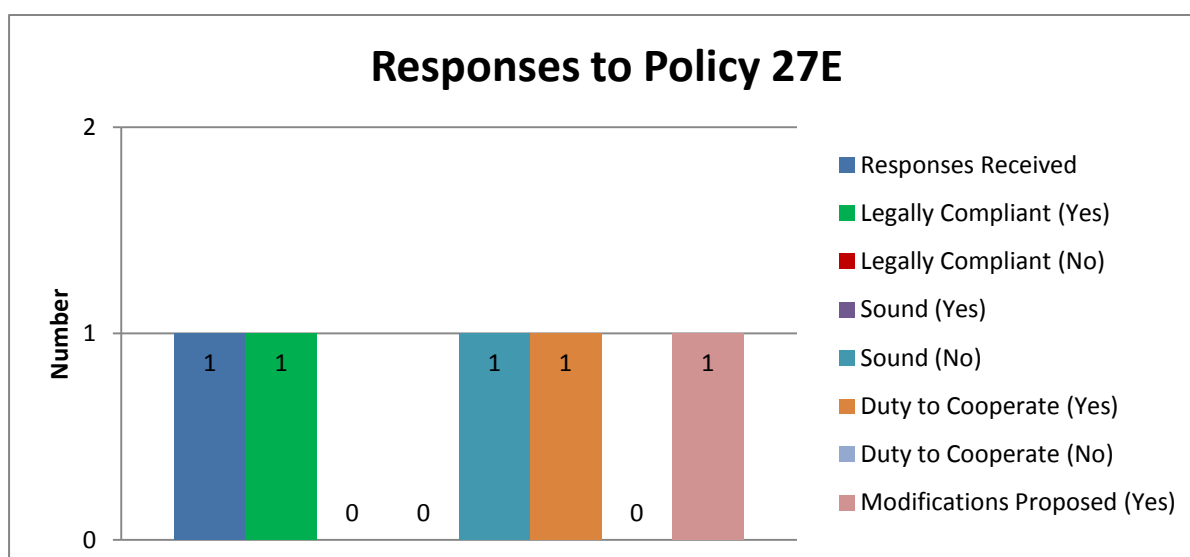


Chapter 27 – Quality Design and Local Distinctiveness

The policies contained within Chapter 27 are:

- Policy 27A Quality Design and Local Distinctiveness
- Policy 27B - Design of Extensions and Alterations
- Policy 27C - Landscaping and Boundary Treatment
- Policy 27D – Advertisements
- Policy 27E - Wyre Forest Waterways

There were no responses for Policy 27A Quality Design and Local Distinctiveness, Policy 27B - Design of Extensions and Alterations, Policy 27C - Landscaping and Boundary Treatment and Policy 27D – Advertisements.



Chapter 28 – Rural development

The policies contained within Chapter 28 are:

- Policy 28A - Re-use and adaptation of rural buildings
- Policy 28B - Chalets, Caravans, Mobile Homes
- Policy 28C - Equestrian Development

There were no responses for any of the policies in Chapter 28.

Chapter 29 – Site Allocations Introduction

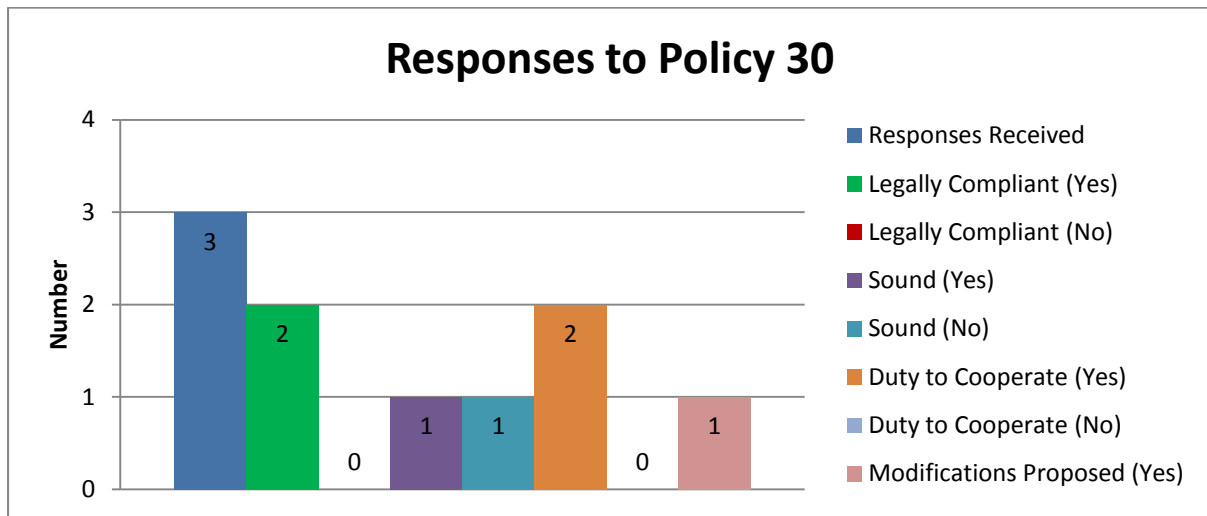
There are no policies in Chapter 29

Chapter 30 – Kidderminster Town

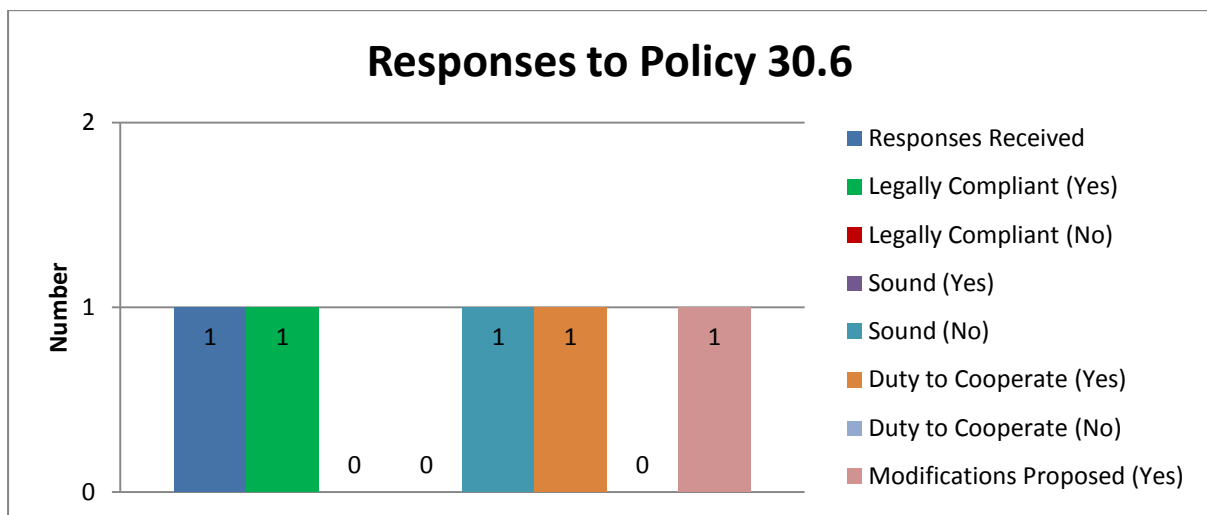
The policies contained within Chapter 30 are:

- Policy 30 Kidderminster Town
- Policy 30.1 Chester Road South Service Station AS/3
- Policy 30.2 Former Victoria Sports Ground AS/5
- Policy 30.3 Lea Street School AS/6
- Policy 30.4 Land North of Bernie Crossland Walk AS/20
- Policy 30.5 Land at Bromsgrove Street (Lion Fields) BHS/2
- Policy 30.6 Timber Yard Park Lane BHS/16
- Policy 30.7 Kidderminster Fire Station BHS/38
- Policy 30.8 Boucher Building Green Street BHS/39
- Policy 30.9 Churchfields BW/1
- Policy 30.10 Limekiln Bridge BW/2
- Policy 30.11 Sladen School Site BW/3
- Policy 30.12 Land at Stourbridge Road BW/4 south
- Policy 30.13 BT Building Mill Street FHN/11
- Policy 30.14 Kidderminster Ambulance Station FPH/5
- Policy 30.15 Silverwoods FPH/10 & FPH/23
- Policy 30.16 Severn Grove Shops FPH/15
- Policy 30.17 Naylor's Field FPH/18
- Policy 30.18 164/5 Sutton Park Road FPH/19
- Policy 30.19 Stourminster School Site OC/11
- Policy 30.20 Sion Hill School Site WFR/WC/18
- Policy 30.21 Land at Low Habberley WA/KF/3
- Policy 30.22 Land rear of Zortech Avenue LI/10
- Policy 30.23 Frank Stone building BHS/10
- Policy 30.24 - Rock Works BHS/17
- Policy 30.25 SDF site FPH/8
- Policy 30.26 Easter Park extension FPH/27
- Policy 30.27 Land at Hoobrook FPH/28

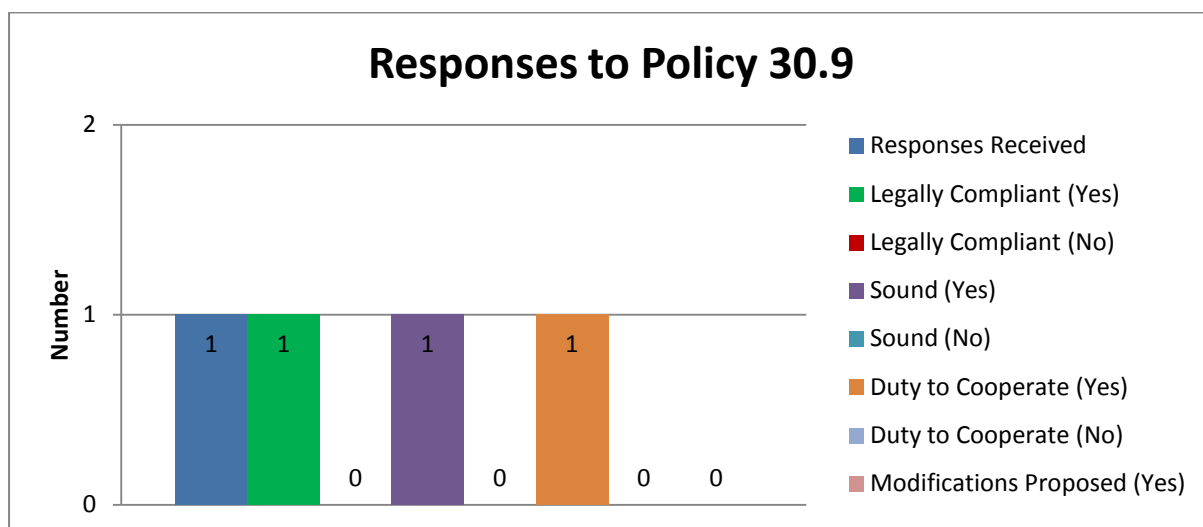
- Policy 30.28 VOSA FPH/29
- Policy 30.29 Former Burlish Golf Course Clubhouse LI/12



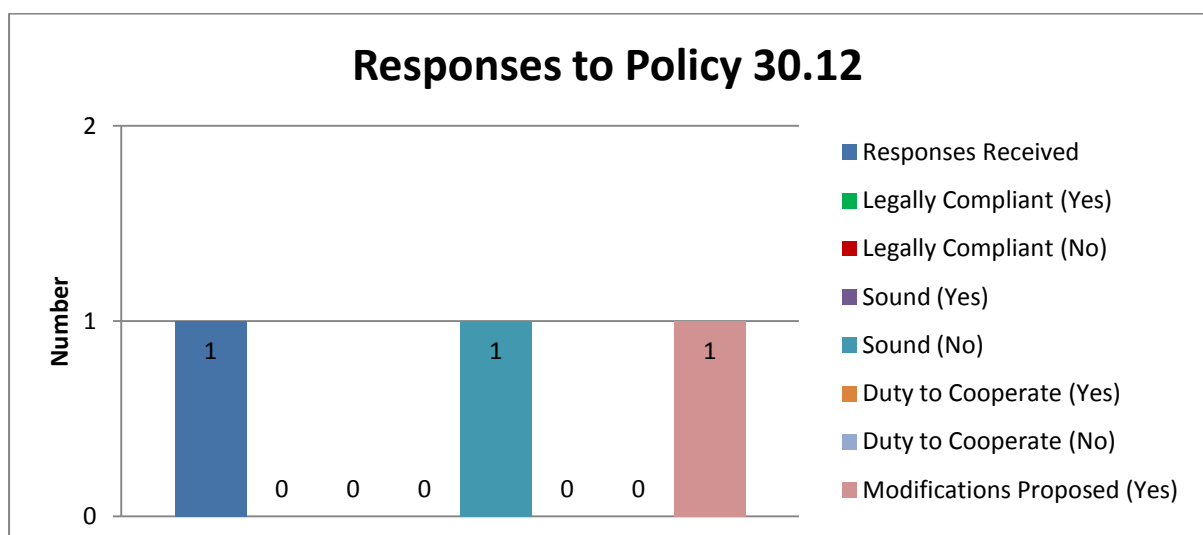
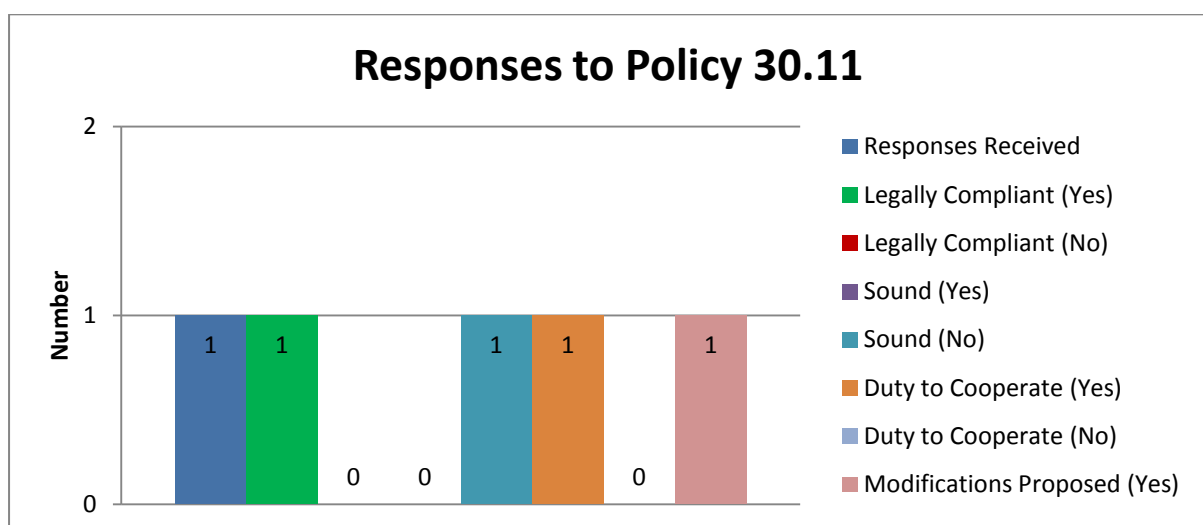
There were no responses to Policy 30.1 Chester Road South Service Station AS/3, Policy 30.2 Former Victoria Sports Ground AS/5, Policy 30.3 Lea Street School AS/6, Policy 30.4 Land North of Bernie Crossland Walk AS/20 and Policy 30.5 Land at Bromsgrove Street (Lion Fields) BHS/2.



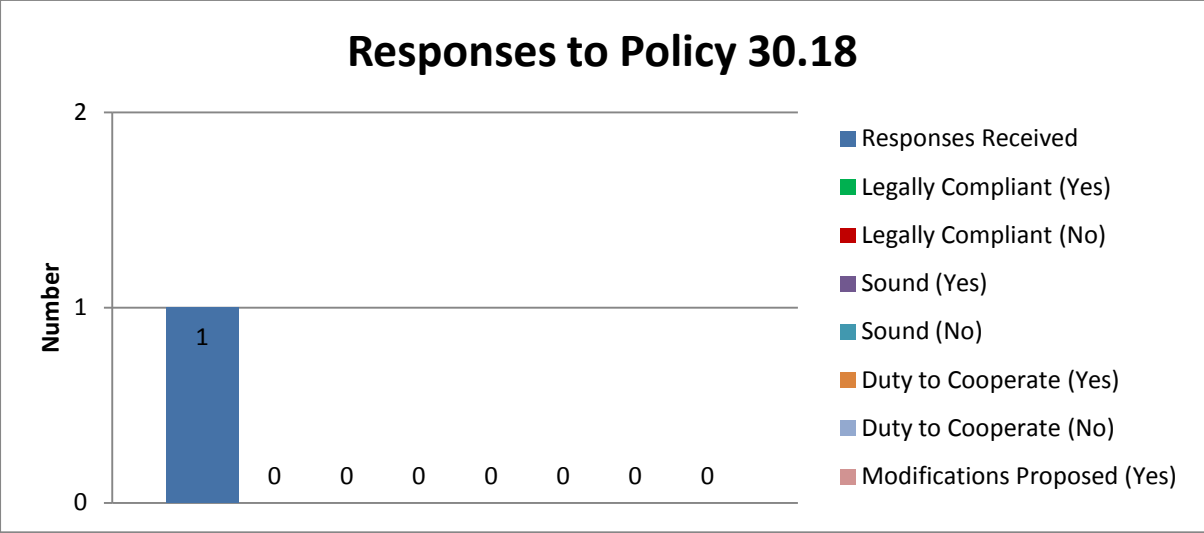
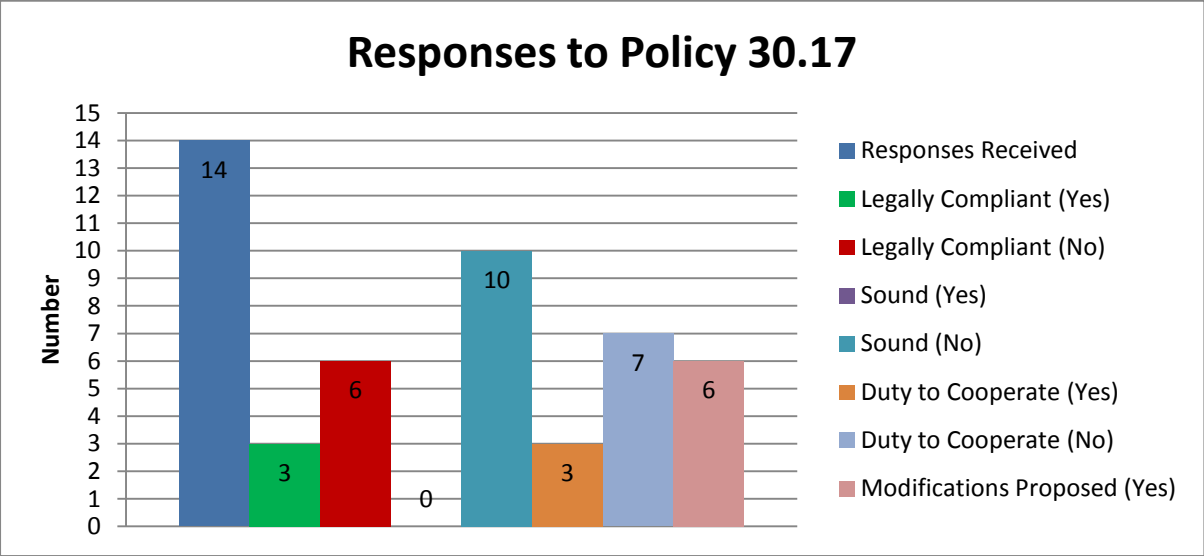
There were no responses for Policy 30.7 Kidderminster Fire Station BHS/38 and Policy 30.8 Boucher Building Green Street BHS/39.

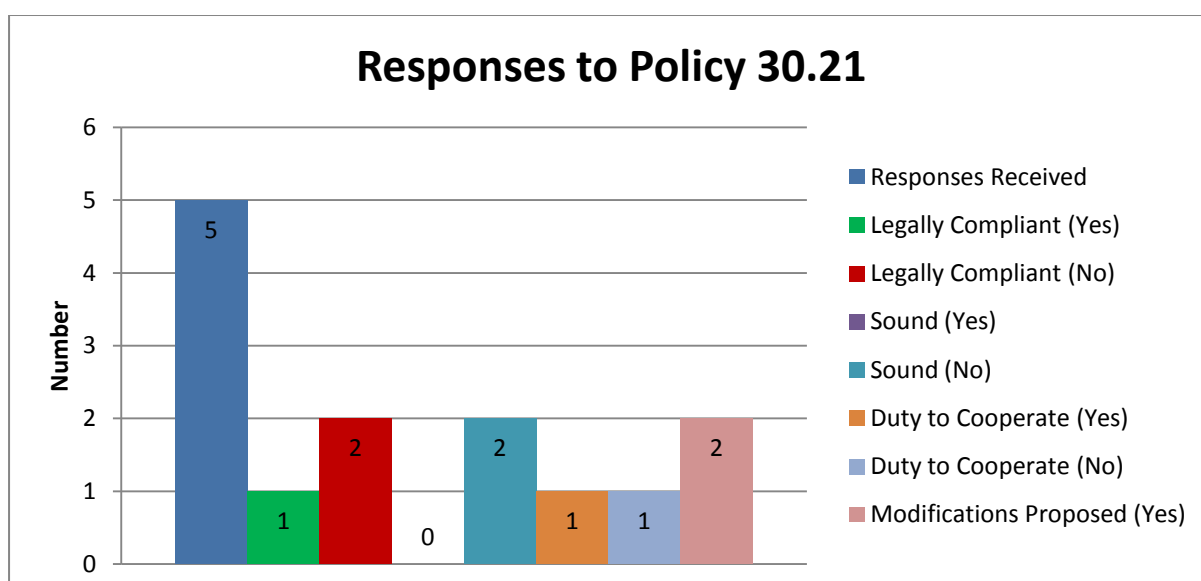
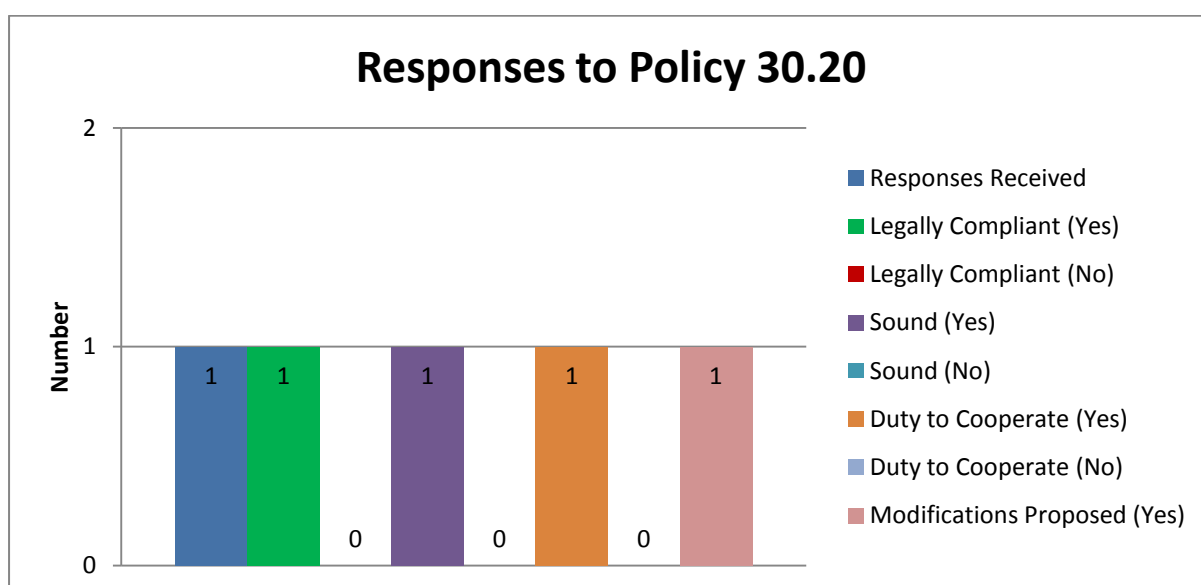
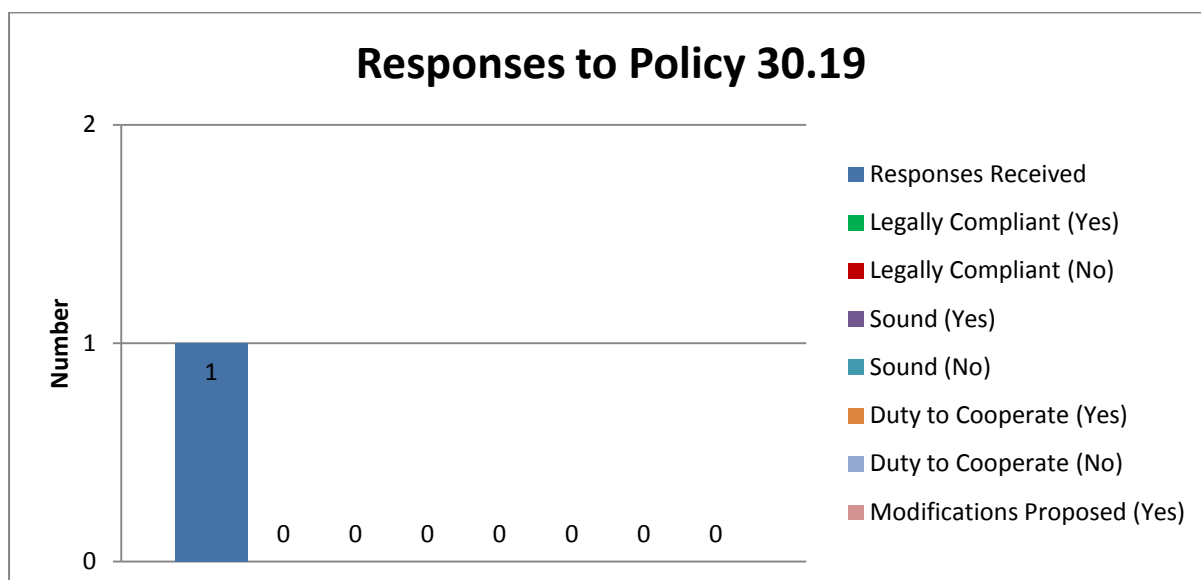


There were no responses for Policy 30.10 Limekiln Bridge BW/2.

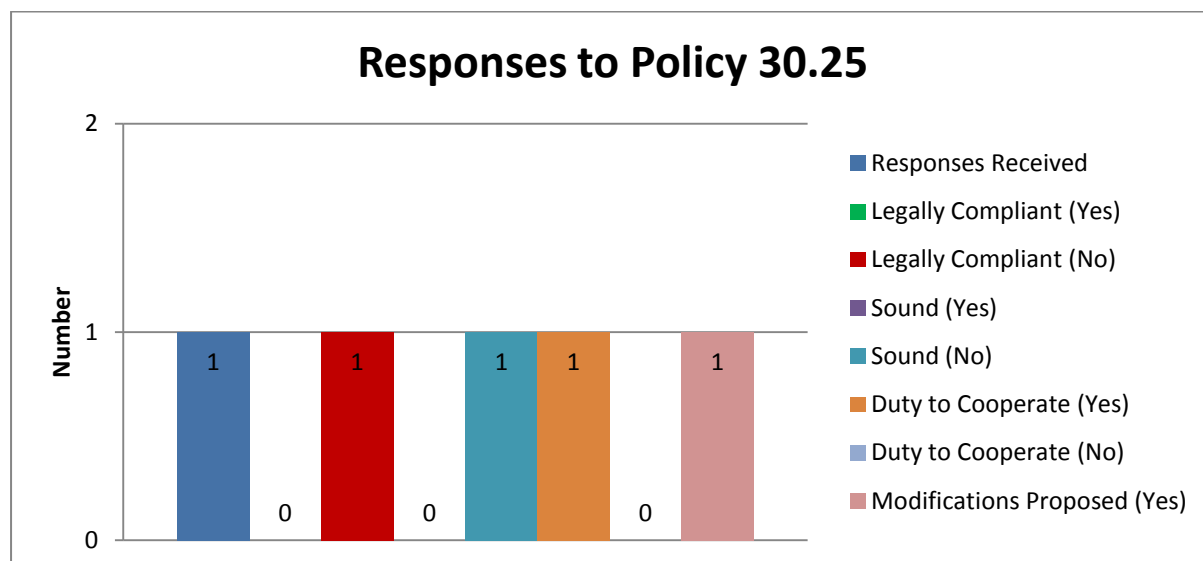


There were no responses for Policy 30.13 BT Building Mill Street FHN/11, Policy 30.14 Kidderminster Ambulance Station FPH/5, Policy 30.15 Silverwoods FPH/10 & FPH/23 and Policy 30.16 Severn Grove Shops FPH/15.





There were no responses for Policy 30.22 Land rear of Zortech Avenue LI/10, Policy 30.23 Frank Stone building BHS/10 and Policy 30.24 - Rock Works BHS/17.

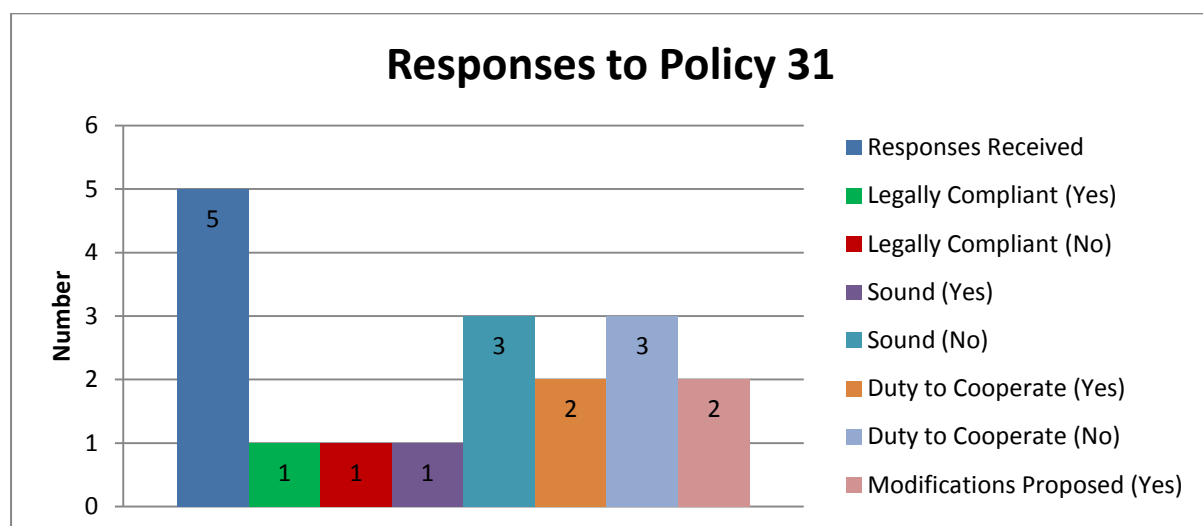


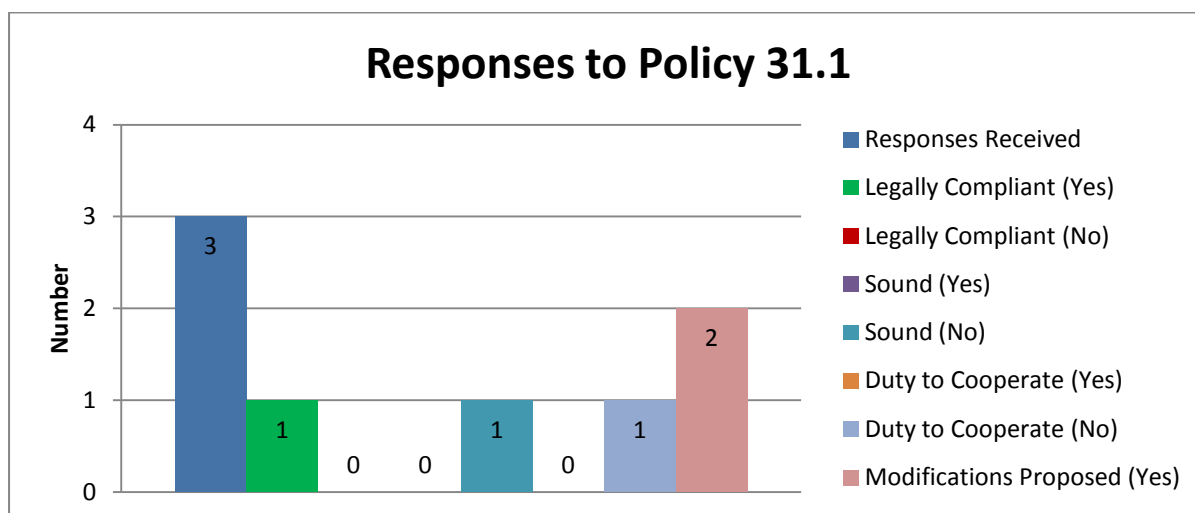
There were no responses for Policy 30.26 Easter Park extension FPH/27, Policy 30.27 Land at Hoobrook FPH/28, Policy 30.28 VOSA FPH/29 and Policy 30.29 Former Burlish Golf Course Clubhouse LI/12.

Chapter 31 – Lea Castle Village

The policies contained within Chapter 31 are:

- Policy 31 - Lea Castle Village
- Policy 31.1 Lea Castle Village vision
- Policy 31.2 Lea Castle Village Principles of Development



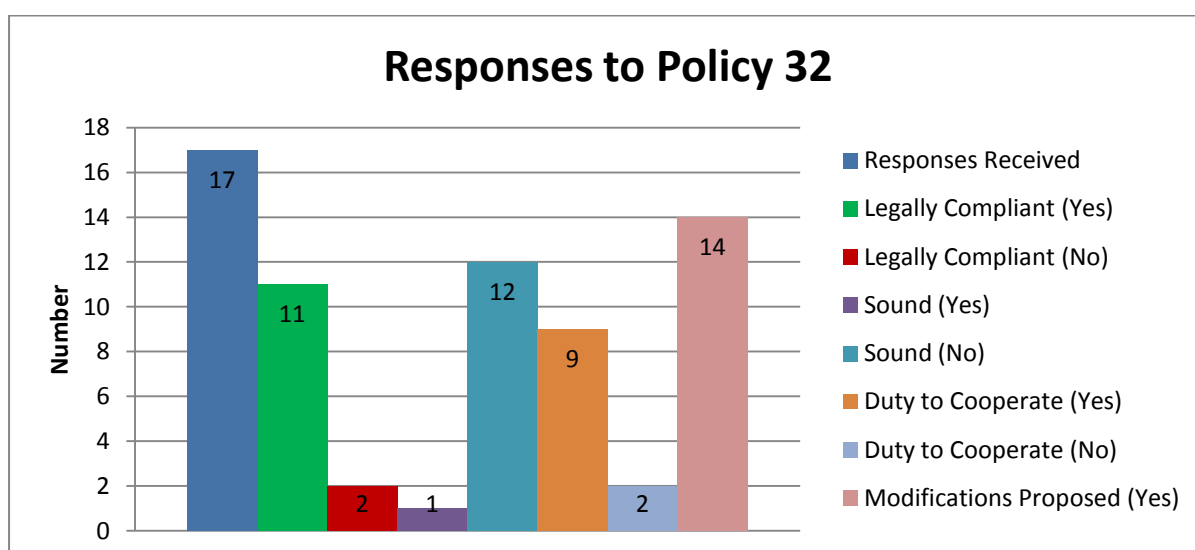


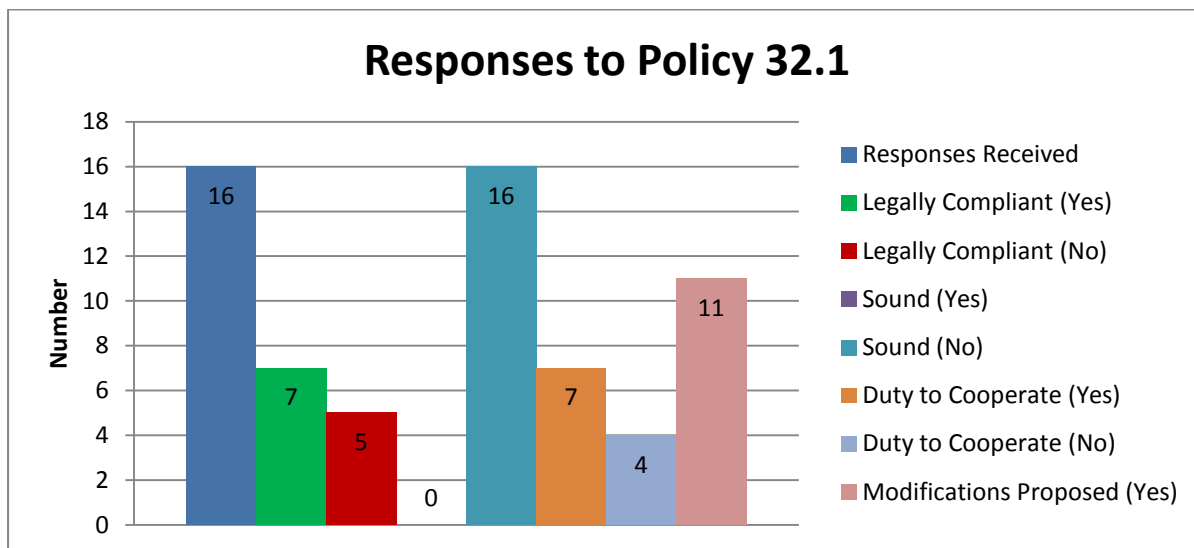
There were no responses to Policy 31.2 Lea Castle Village Principles of Development.

Chapter 32 – Kidderminster Eastern Extension

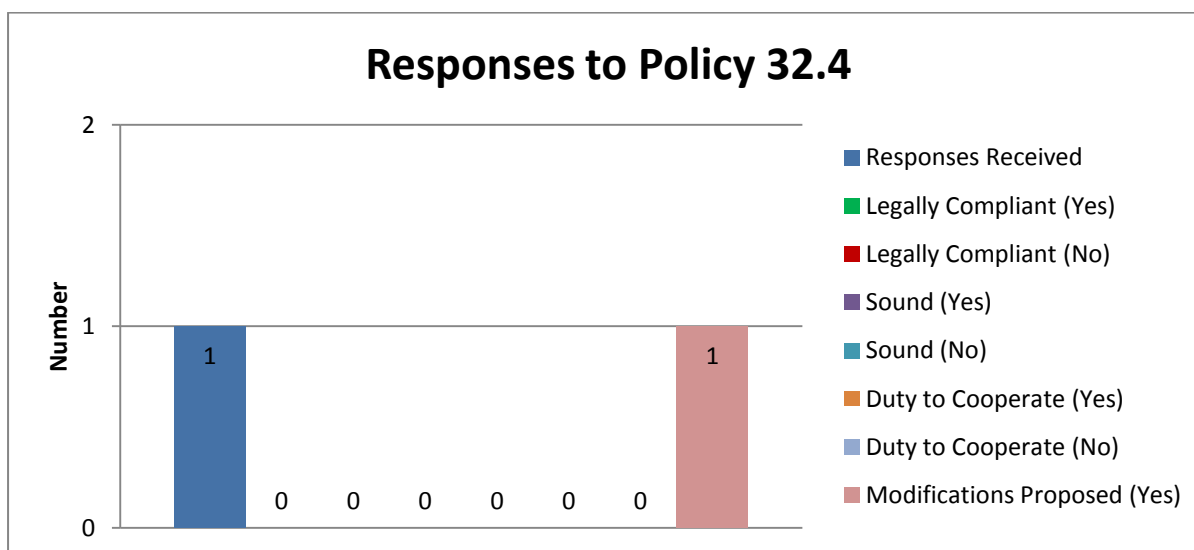
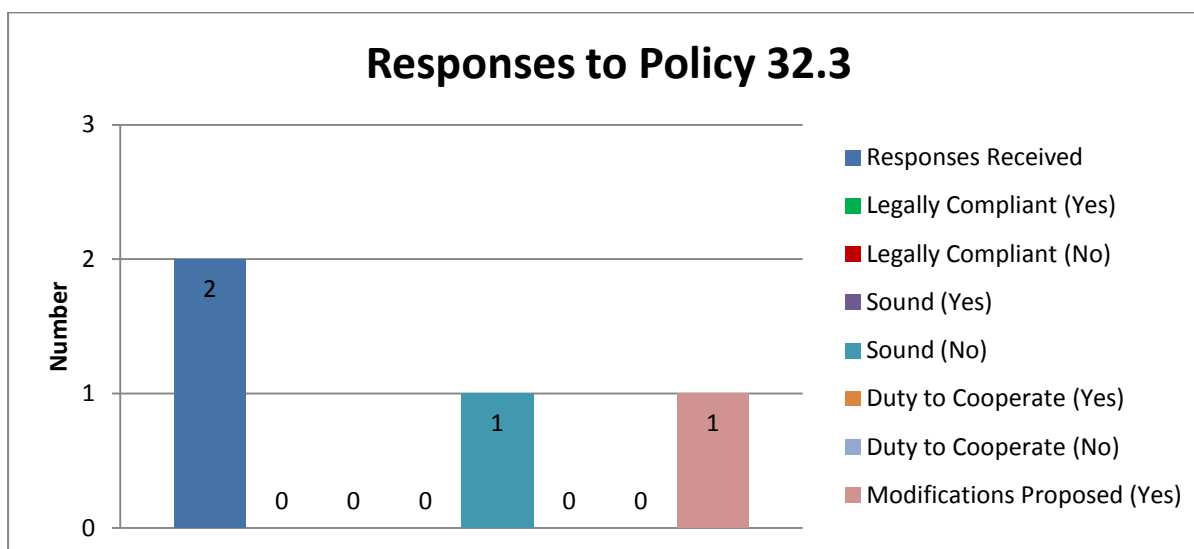
The policies contained within Chapter 32 are:

- Policy 32 - Kidderminster Eastern Extension
- Policy 32.1 Land at Husum Way OC/5
- Policy 32.2 Comberton Lodge Nursery OC/12
- Policy 32.3 Land East of Offmore (OC/6) and Land at Stone Hill North (OC/13N) Overall Vision
- Policy 32.4 Site specific Principles of Development





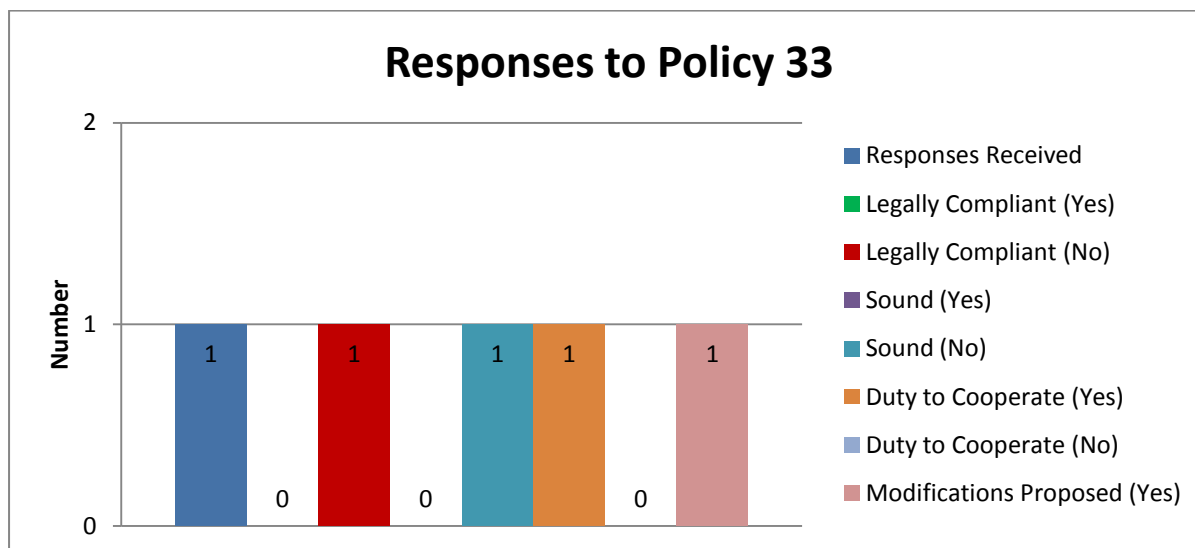
There were no responses to Policy 32.2 Comberton Lodge Nursery OC/12.

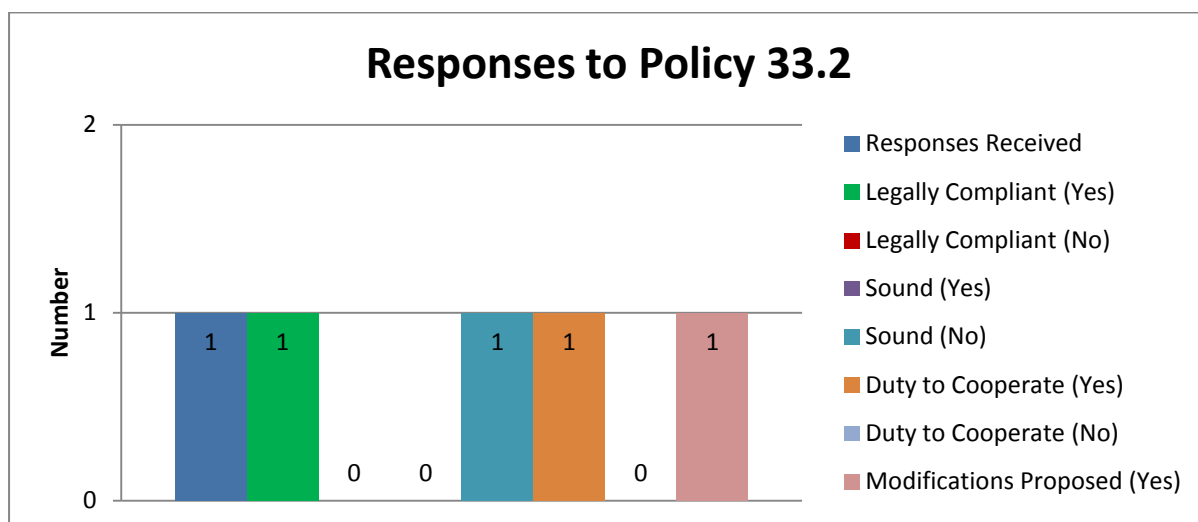


Chapter 33 – Stourport-on-Severn

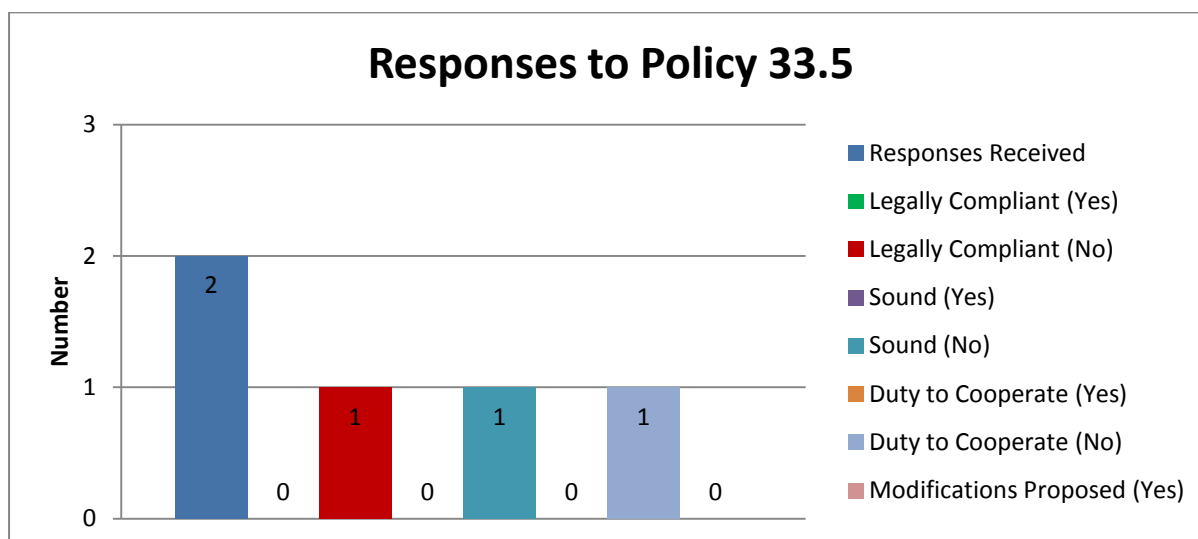
The policies contained within Chapter 33 are:

- Policy 33 Stourport-on-Severn Site Allocations
- Policy 33.2 Cheapside AKR/2
- Policy 33.3 Swan Hotel / Working Men’s Club AKR/7
- Policy 33.4 Queens Road Shops AKR/10
- Policy 33.5 Pearl Lane AKR/14
- Policy 33.6 Yew Tree Walk AKR/18
- Policy 33.7 Former Carpets of Worth AKR/20
- Policy 33.8 Land west of former school site Coniston Crescent LI/11
- Policy 33.9 County Buildings MI/1
- Policy 33.10 Baldwin Road MI/5
- Policy 33.11 Steatite Way MI/6
- Policy 33.12 Worcester Road Car Sales (southern part) MI/7
- Policy 33.13 Four Acres Caravan Park MI/10
- Policy 33.14 Land at 3 Sandy Lane Tilton MI/11
- Policy 33.15 Land adjacent Rock Tavern Wilden Lane MI/24
- Policy 33.16 School site Coniston Crescent MI/38
- Policy 33.17 Firs View Yard Wilden Lane MI/36
- Policy 33.18 Parsons Chain MI/3
- Policy 33.19 North of Wilden Lane Industrial Estate MI/18
- Policy 33.20 Wilden Lane Industrial Estate MI/33
- Policy 33.20 Minster Road Outdoor Sports Area

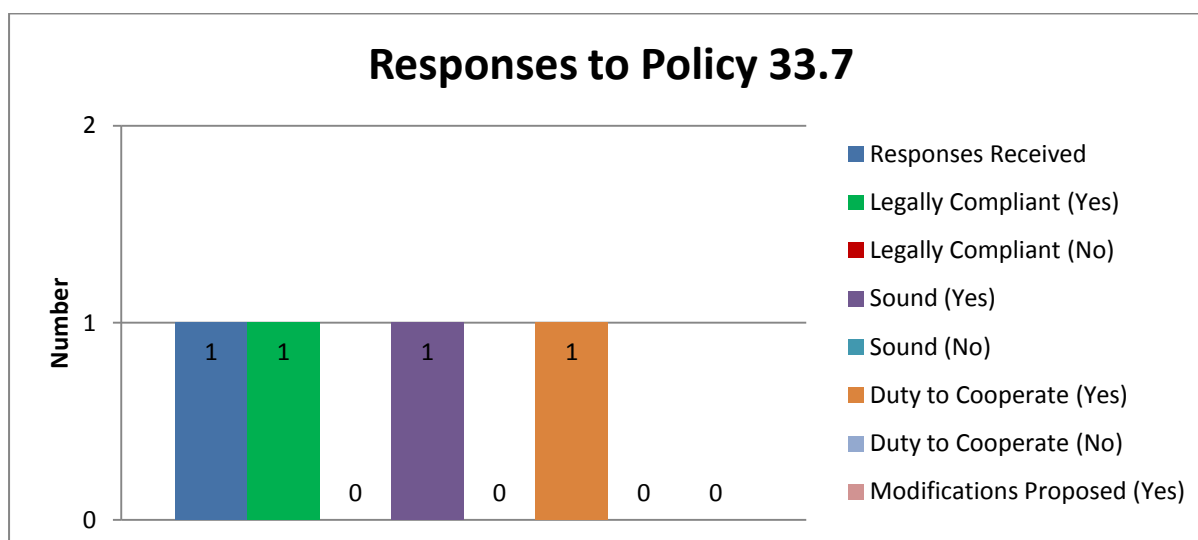


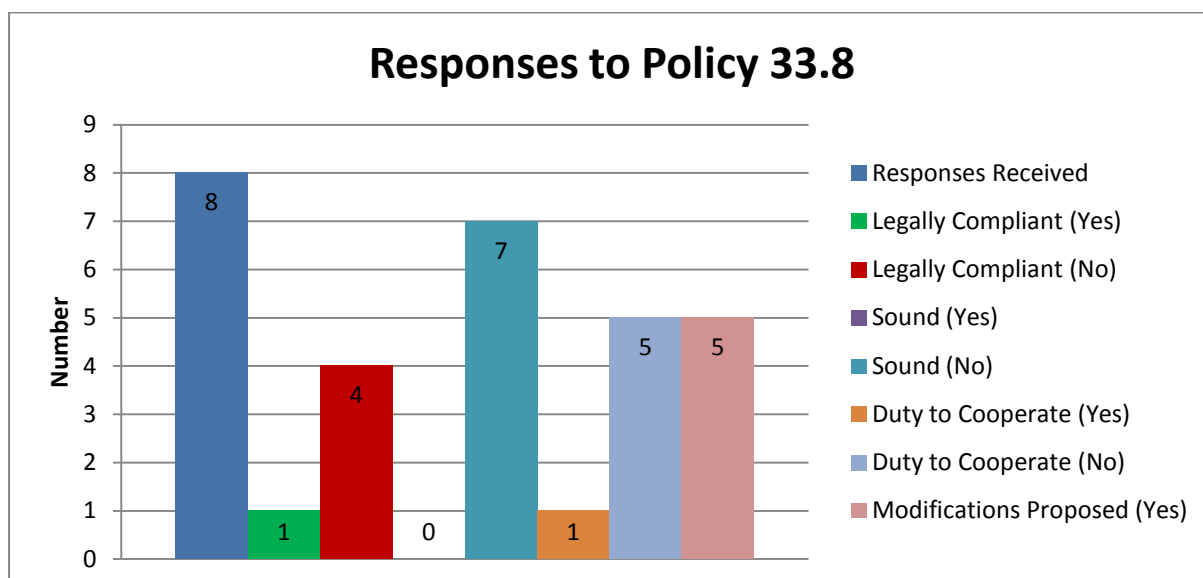


There were no responses for Policy 33.3 Swan Hotel / Working Men's Club AKR/7 and Policy 33.4 Queens Road Shops AKR/10.

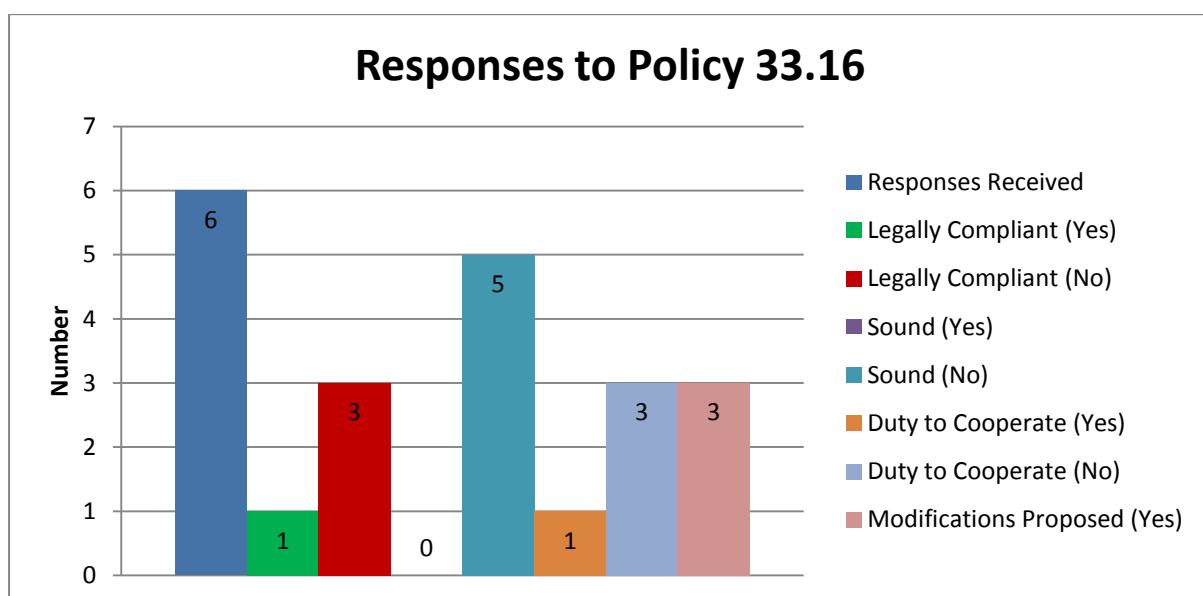


There were no responses for Policy 33.6 Yew Tree Walk AKR/18.

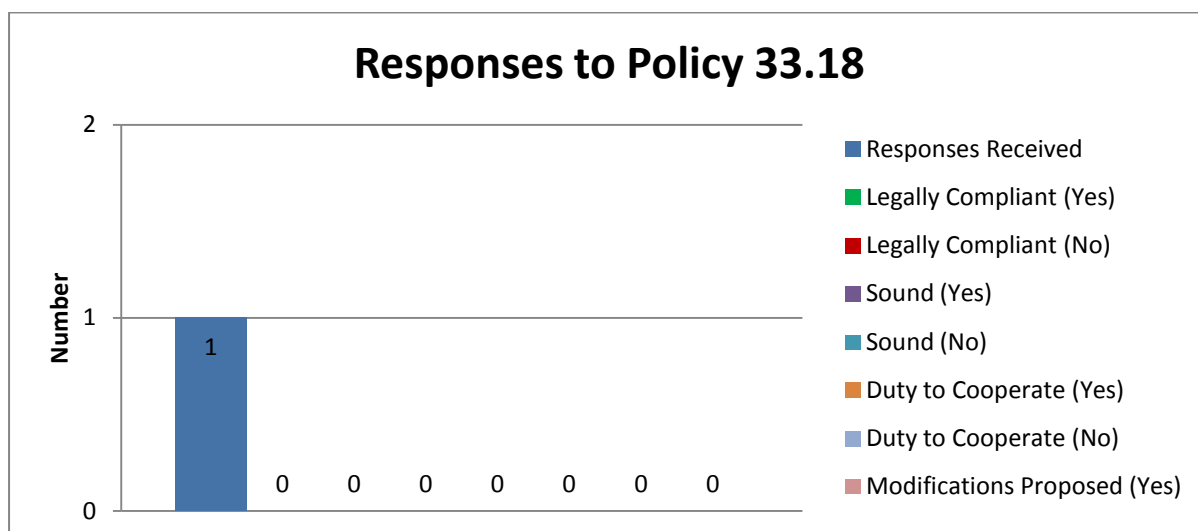




Policy 33.9 County Buildings MI/1, Policy 33.10 Baldwin Road MI/5, Policy 33.11 Steatite Way MI/6, Policy 33.12 Worcester Road Car Sales (southern part) MI/7, Policy 33.13 Four Acres Caravan Park MI/10, Policy 33.14 Land at 3 Sandy Lane Titton MI/11 and Policy 33.15 Land adjacent Rock Tavern Wilden Lane MI/24.



There were no responses for Policy 33.17 Firs View Yard Wilden Lane MI/36.

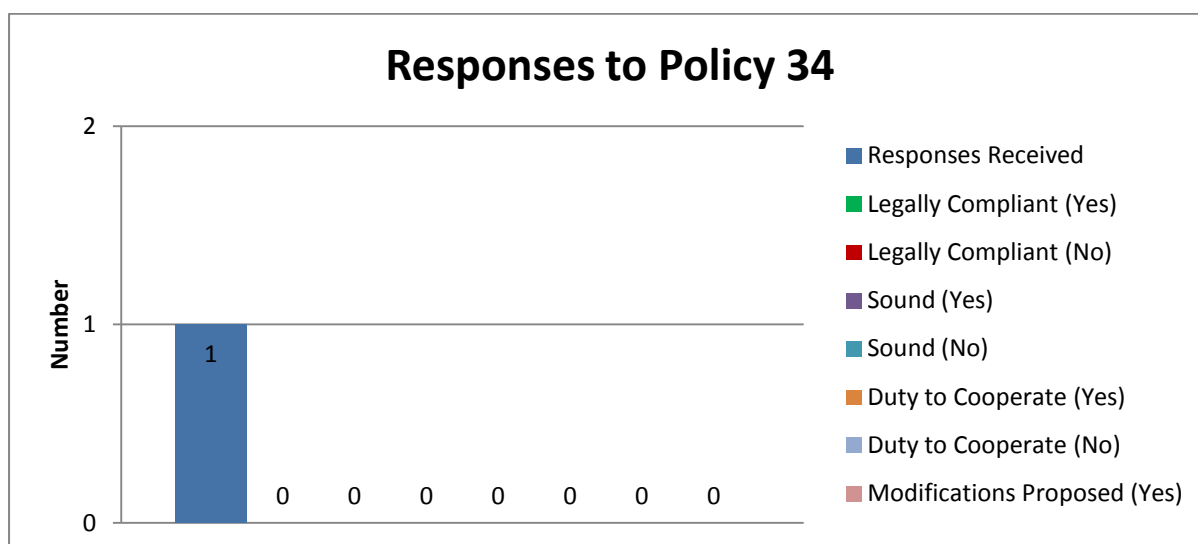


There were no responses for Policy 33.19 North of Wilden Lane Industrial Estate MI/18, Policy 33.20 Wilden Lane Industrial Estate MI/33 and Policy 33.20 Minster Road Outdoor Sports Area.

Chapter 34 - Bewdley

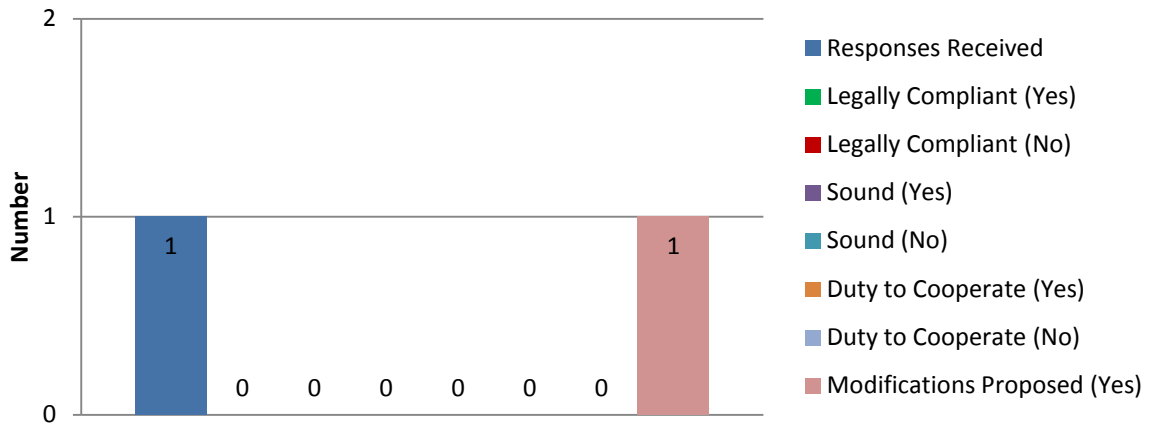
The policies contained within Chapter 34 are:

- Policy 34 - Bewdley Site Allocations
- Policy 34.1 - Bewdley Fire Station BR/BE/1
- Policy 34.2 - Stourport Road Triangle WA/BE/1
- Policy 34.3 - Catchem's End WA/BE/3
- Policy 34.4 - Land south of Habberley Road WA/BE/5

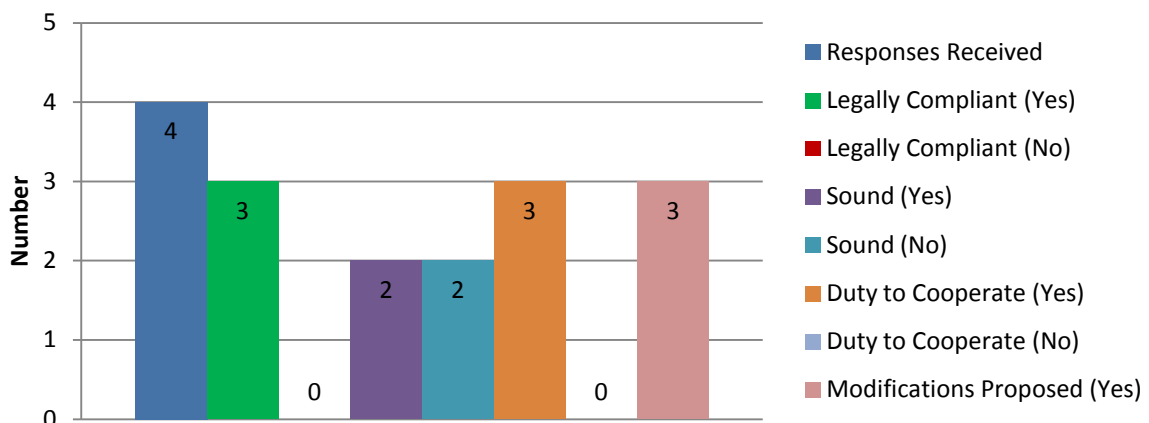


There were no responses for Policy 34.1 - Bewdley Fire Station BR/BE/1.

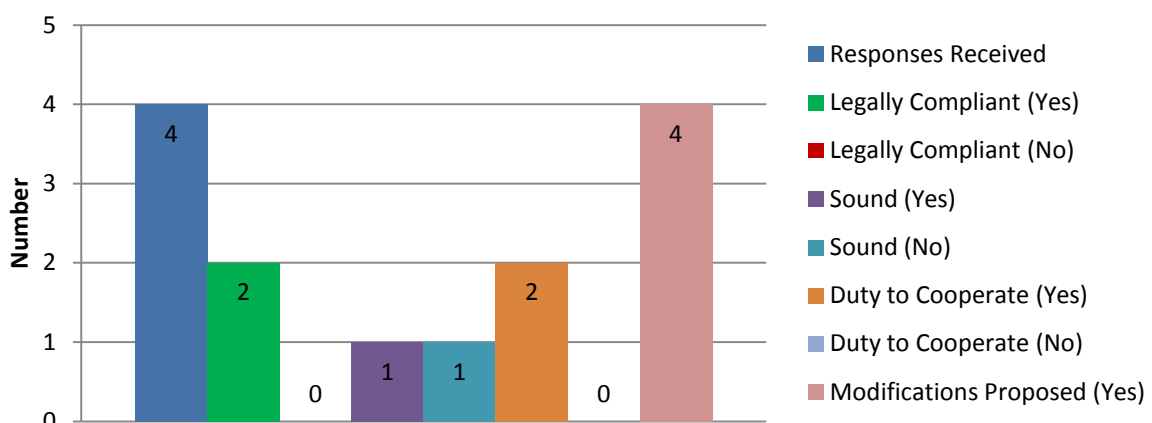
Responses to Policy 34.2



Responses to Policy 34.3



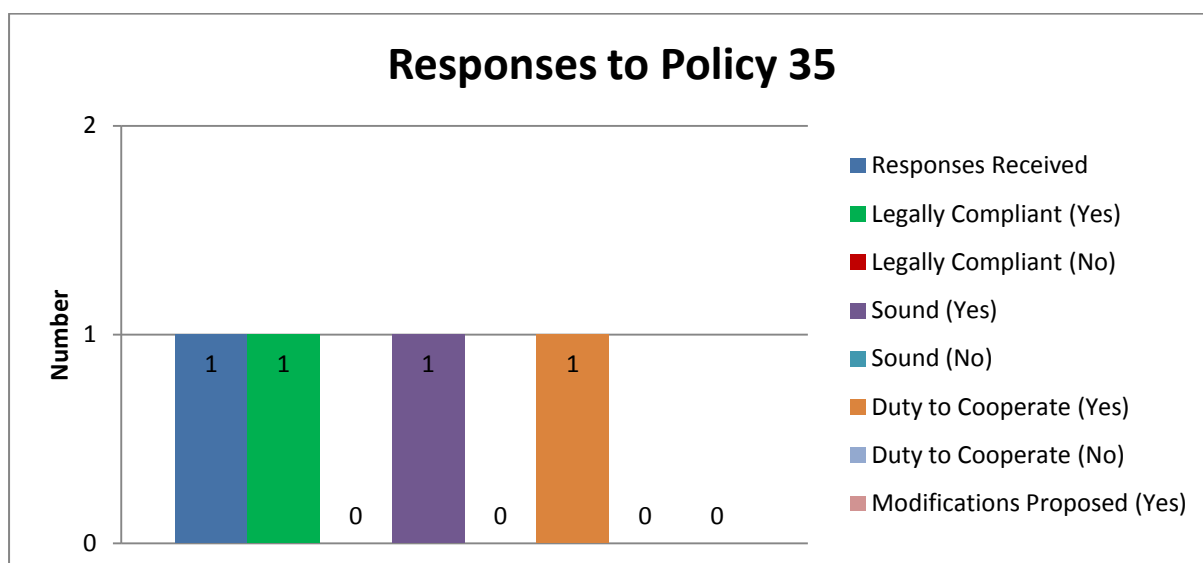
Responses to Policy 34.4



Chapter 35 – Previously developed Sites in the Green Belt

The policies contained within Chapter 35 are:

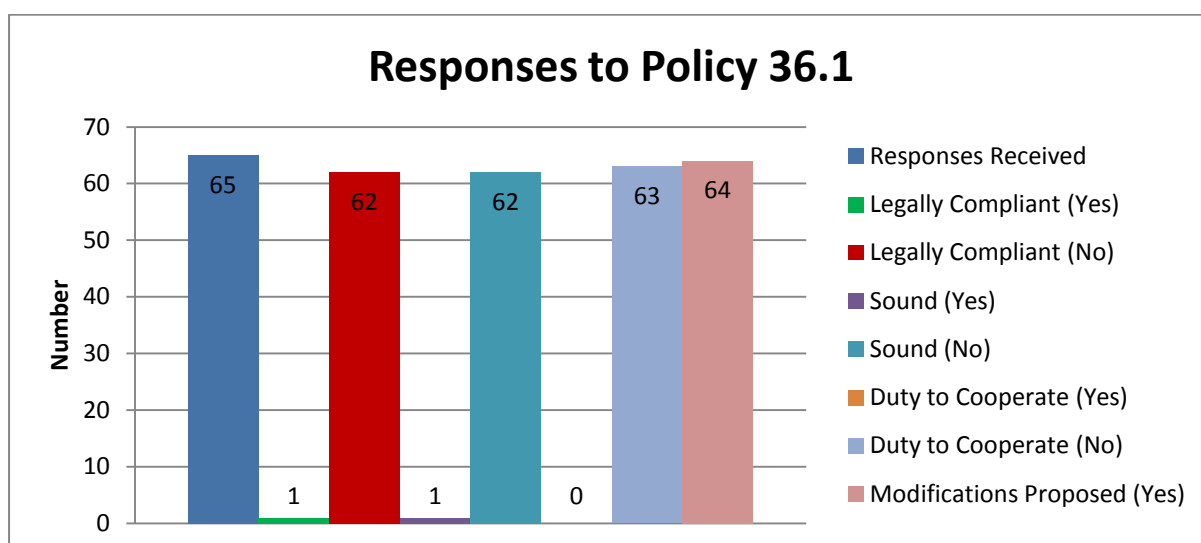
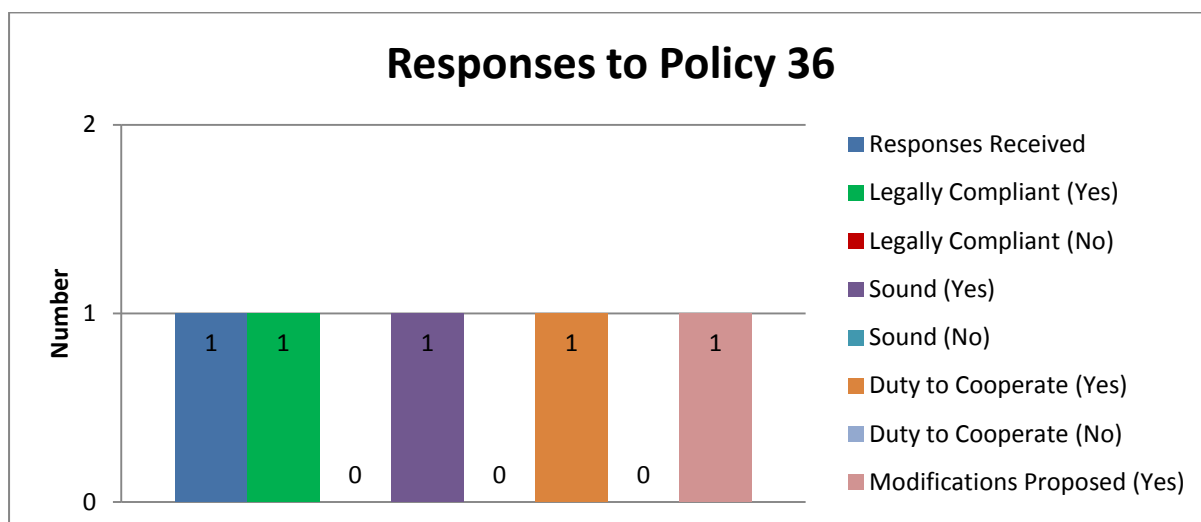
- Policy 35 - Previously Developed Sites in the Green Belt



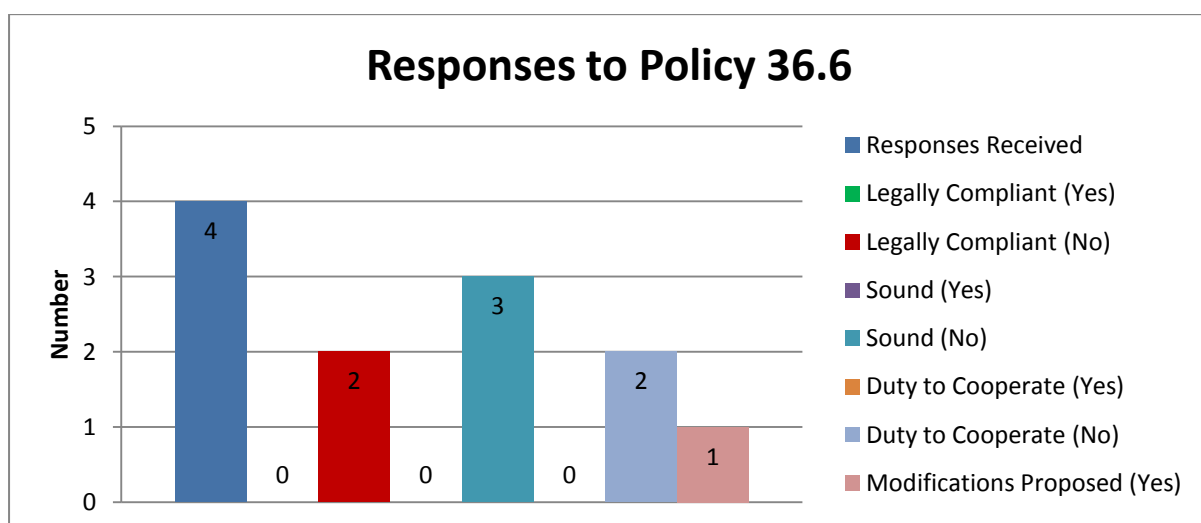
Chapter 36 – Rural Wyre Forest

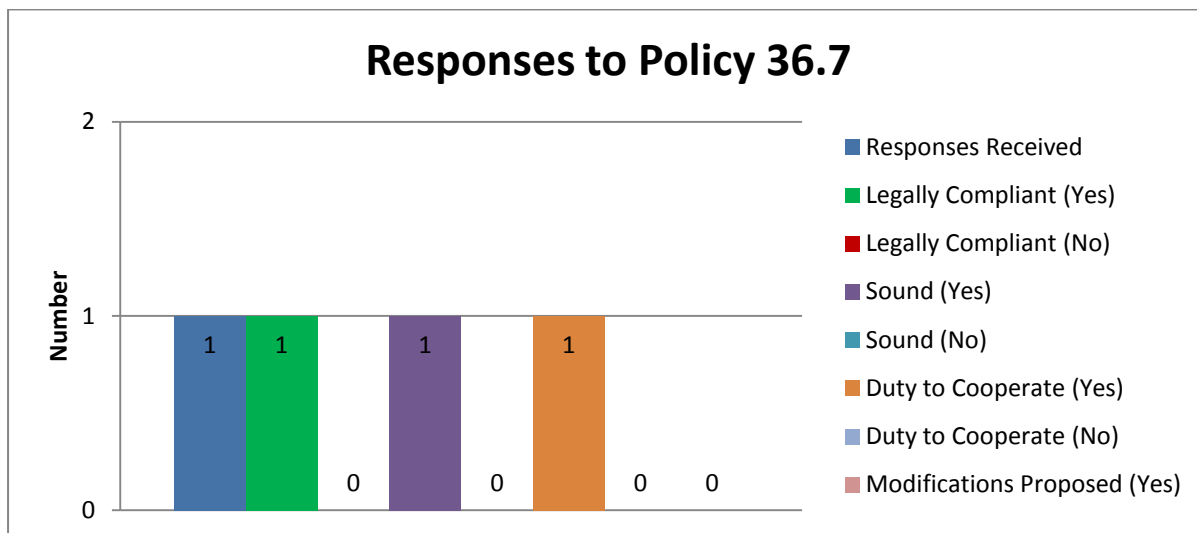
The policies contained within Chapter 36 are:

- Policy 36 Villages and Rural Areas Site Allocations
- Policy 36.1 Lem Hill Nurseries BR/RO/2
- Policy 36.2 Alton Nurseries Long Bank BR/RO/21
- Policy 36.3 Bellman's Cross Shatterford WA/UA/1
- Policy 36.4 Allotments, Upper Arley WA/UA/4
- Policy 36.5 Red Lion Car Park WA/UA/6
- Policy 36.6 Station Yard Blakedown WFR/CB/2
- Policy 36.7 Fold Farm Chaddesley Corbett WFR/CC/8
- Policy 36.8 Land at Lowe Lane Fairfield WFR/WC/22
- Policy 36.9 Rock Tavern Car Park Caunsall WFR/WC/36
- Policy 36.10 Land at Caunsall Road Caunsall WFR/WC/37

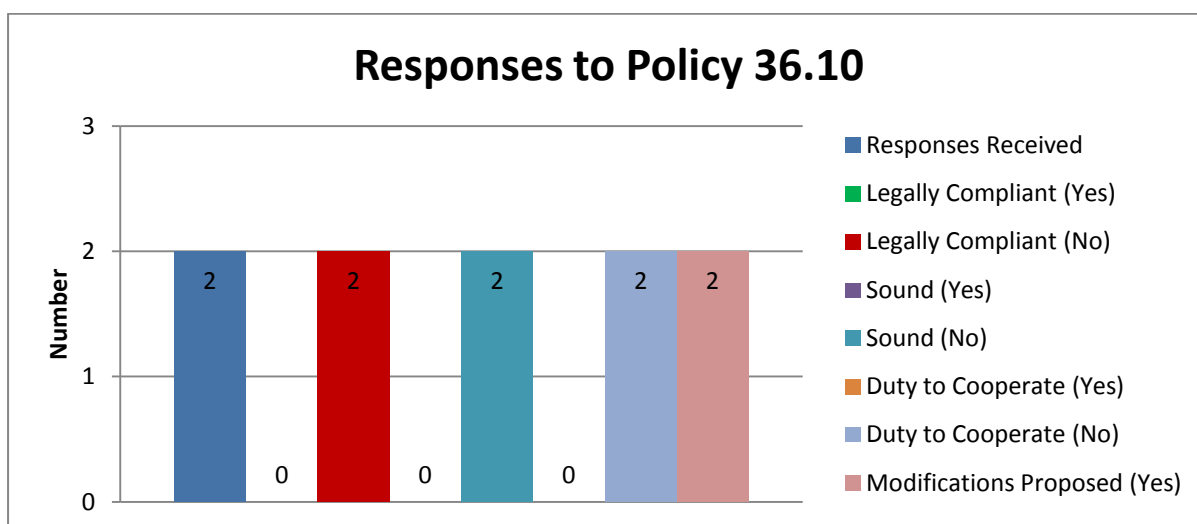


There were no responses to Policy 36.2 Alton Nurseries Long Bank BR/RO/21, Policy 36.3 Bellman's Cross Shatterford WA/UA/1, Policy 36.4 Allotments, Upper Arley WA/UA/4 and Policy 36.5 Red Lion Car Park WA/UA/6.





There were no responses to Policy 36.8 Land at Lowe Lane Fairfield WFR/WC/22 and Policy 36.9 Rock Tavern Car Park Caunsall WFR/WC/36.



Chapter 37 – Monitoring and Implementation Framework

There are no policies in Chapter 37.

6) Responses to Amendments to the Pre-Submission Publication Document policies (July 2019)

The following graphs show the number of responses received for each of the policies within the Amendments to the Pre-Submission Publication Document (July 2019). Within those responses the graphs also show:

- Number that considered the plan to be Legally Compliant
- Number that considered the plan was not Legally Compliant
- Number that considered the plan to be Sound

- Number that considered the plan to be Unsound
- Number that considered the plan complied with the Duty to Cooperate
- Number that considered the plan did not comply with the Duty to Cooperate
- Number who proposed Modifications to the plan

Summaries of responses to each chapter of the document can be found at Appendix D.

Chapters 1-4

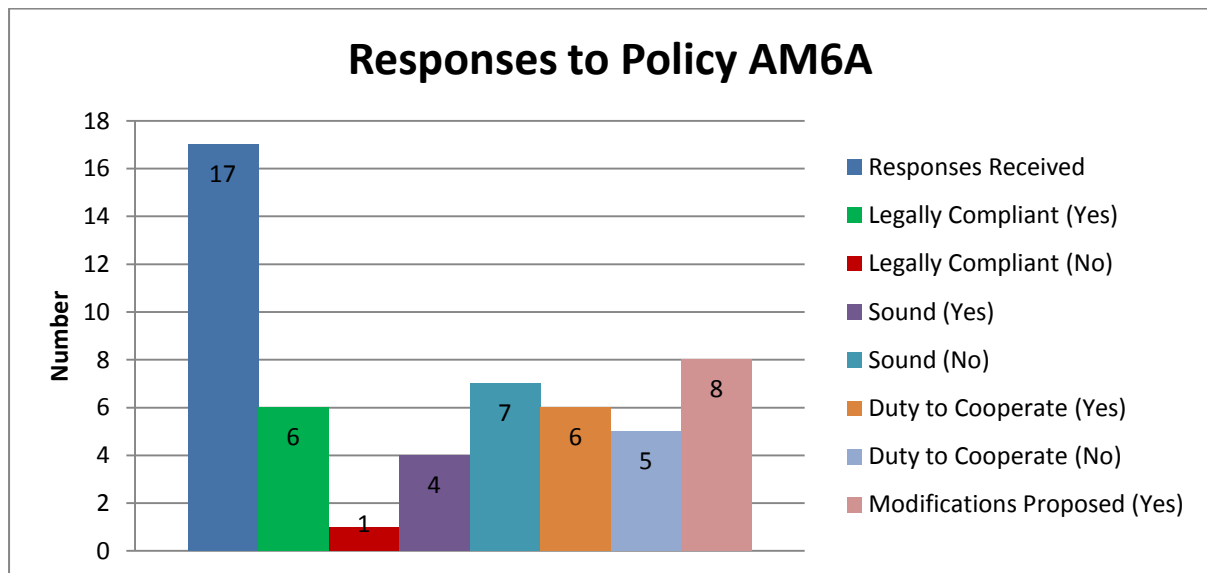
There were no policies in these chapters of the amendments document:

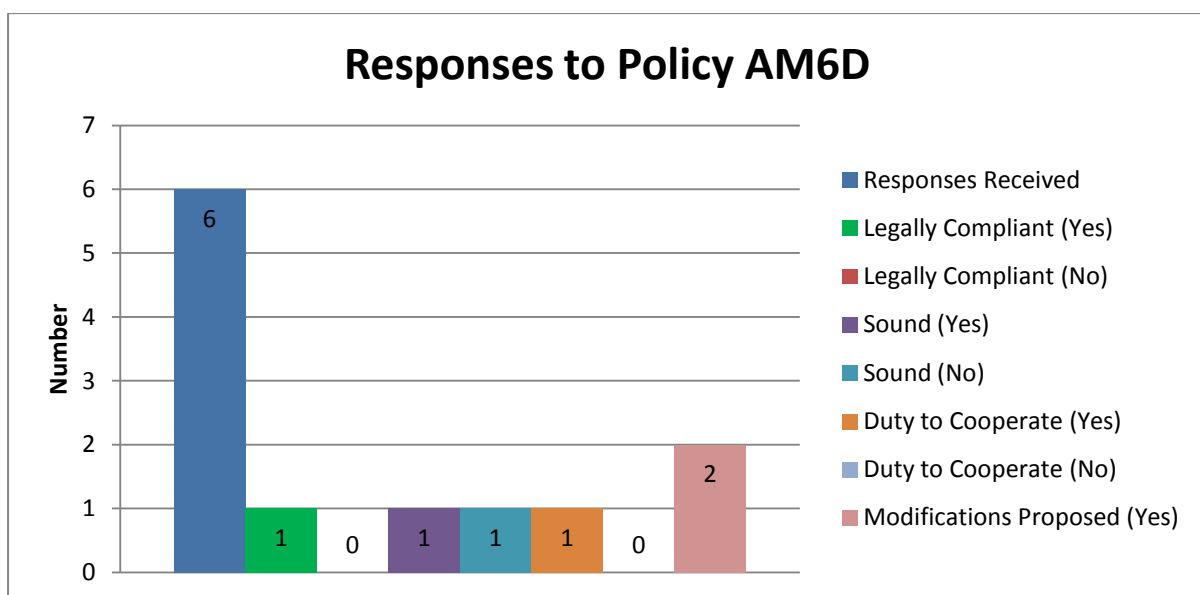
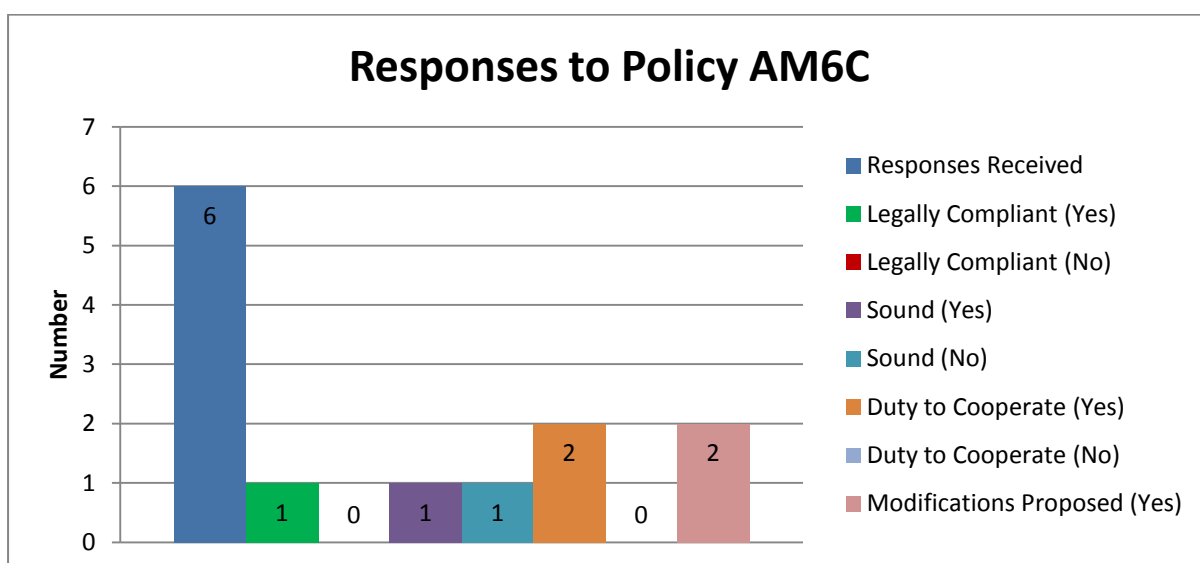
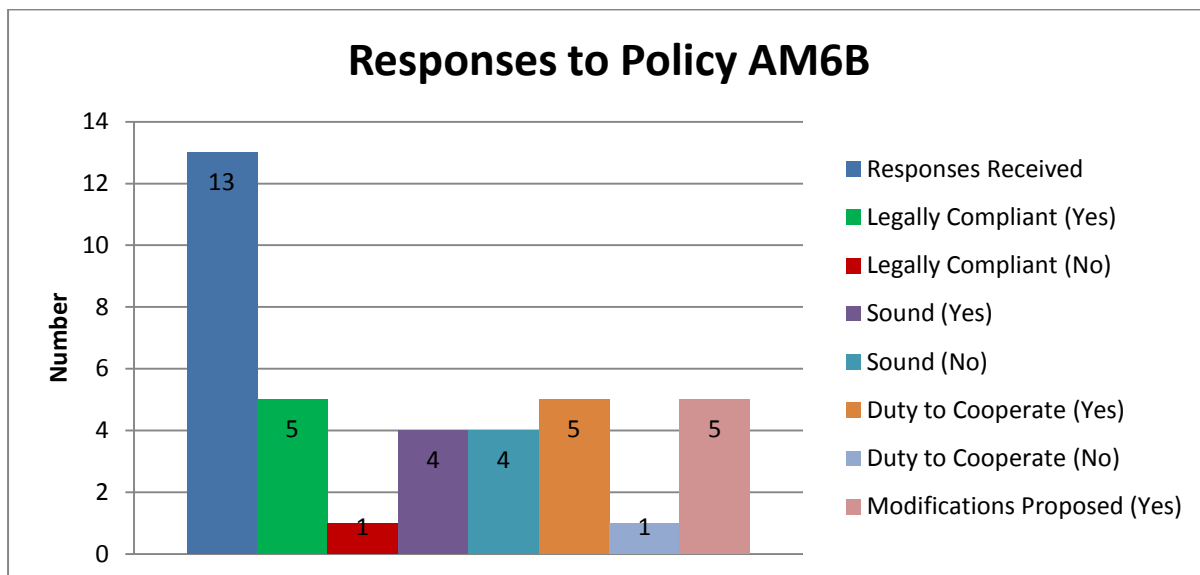
1. Introduction
2. Amendments made to the Wyre Forest District Local Plan Pre-Submission Document
3. Amendments to Foreword of the Local Plan (Pre-Submission document (2018))
4. Amendments to Chapter 1 (Pre-Submission document (2018)) – Introduction and Context

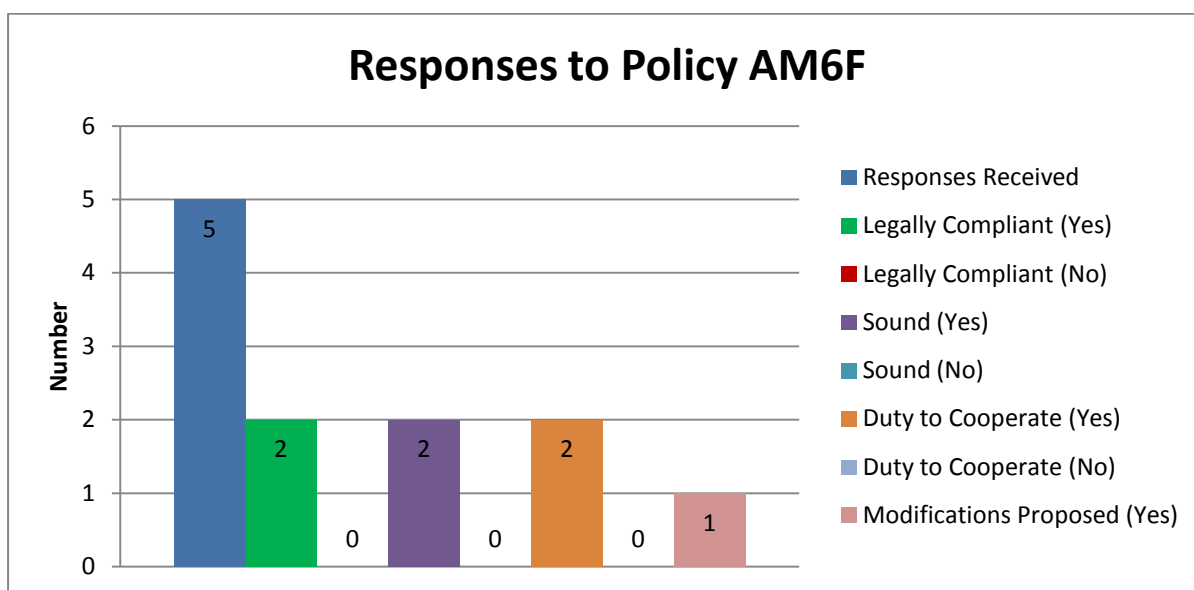
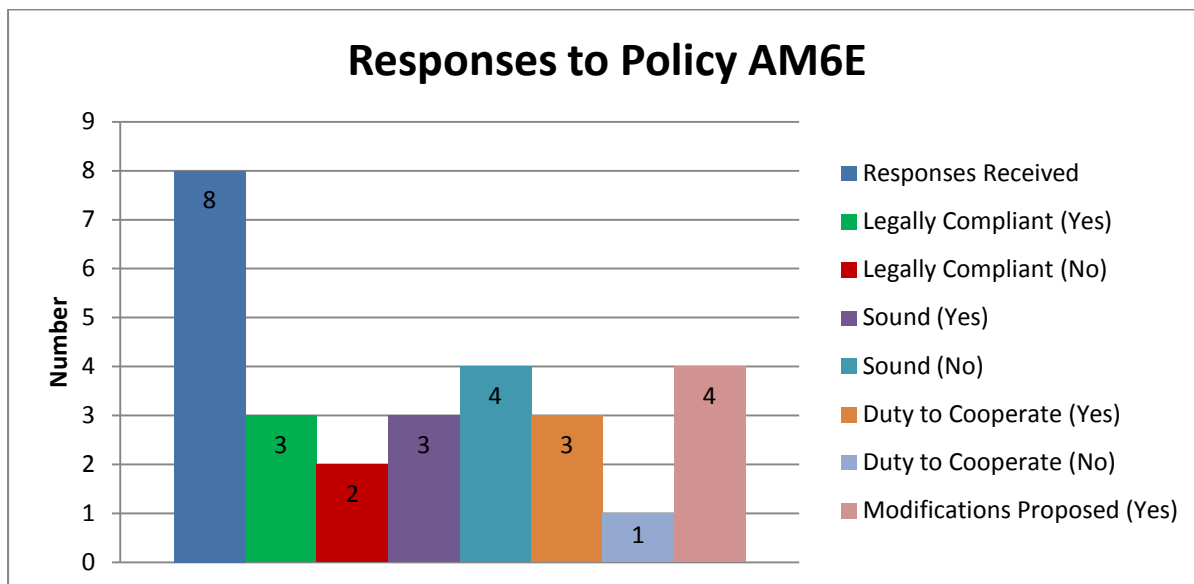
Chapter 5: Amendments to Chapter 6 of the Pre-Submission document (2018) – A Sustainable Future: Development Strategy

The following policies were updated in this chapter of the amendments document:

- Policy AM6A - Development Needs 2016 – 2036
- Policy AM6B - Locating New Development
- Policy AM6C - Kidderminster town as the strategic centre of the District
- Policy AM6D - Strategic Allocation Sites
- Policy AM6E - Role of Stourport-on-Severn and Bewdley as Market Towns
- Policy AM6F - Role of the existing villages and rural areas



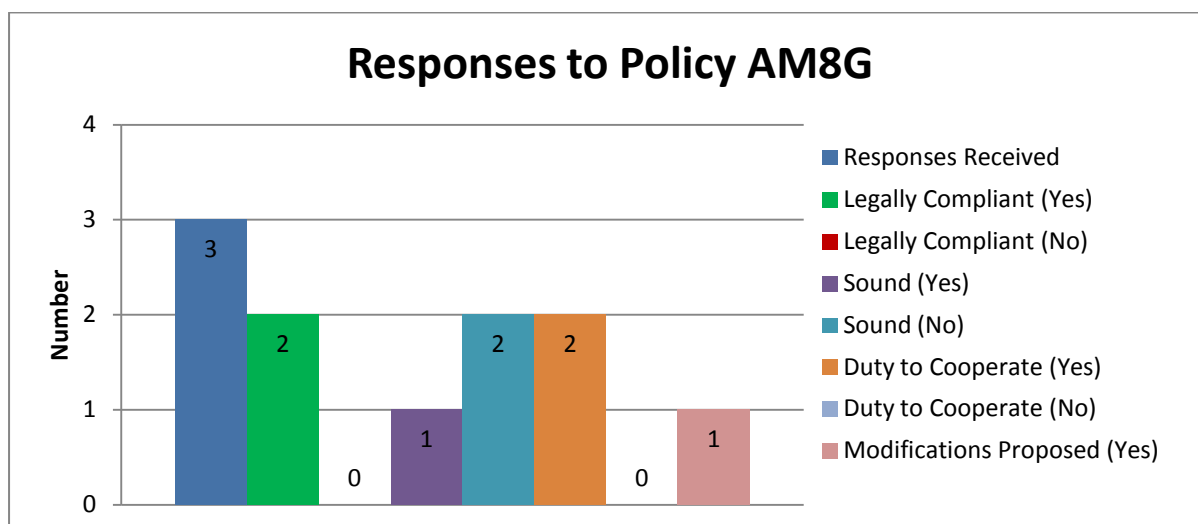




Chapter 6: Amendments to Policy 8G of the Pre-Submission document (2018) - Site Provision for Travelling Showpeople

The following policies were updated in this chapter of the amendments document:

- Policy AM8G - Site Provision for Travelling Showpeople



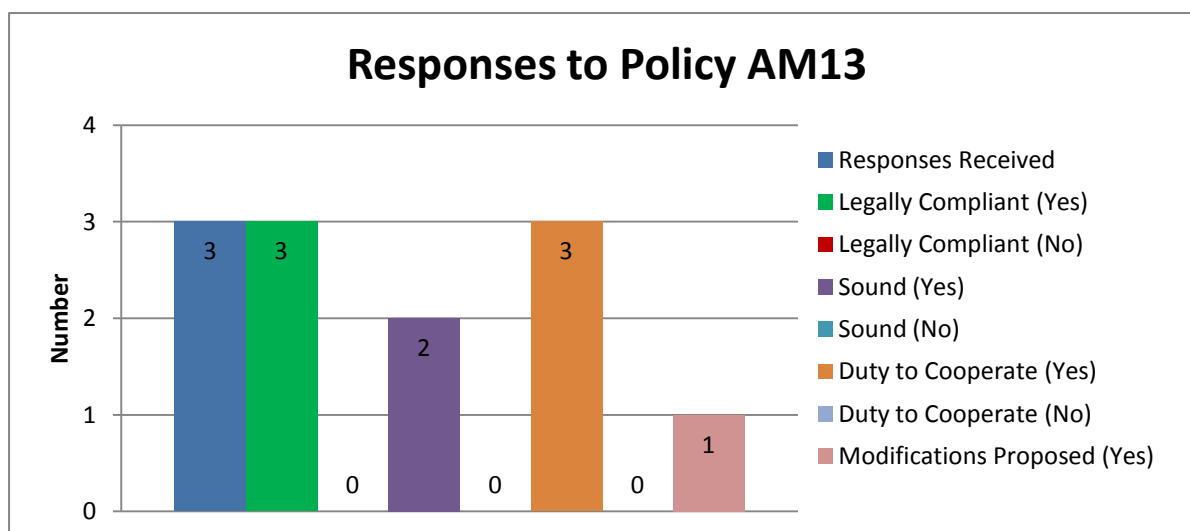
Chapter 7: Amendments to Chapter 10 of the Pre-Submission document (2018) – A Good Place to do Business

No policies were updated in this chapter of the amendments document.

Chapter 8: Amendments to Chapter 13 of the Pre-Submission document (2018) – Transport and Accessibility

The following policies were updated in this chapter of the amendments document:

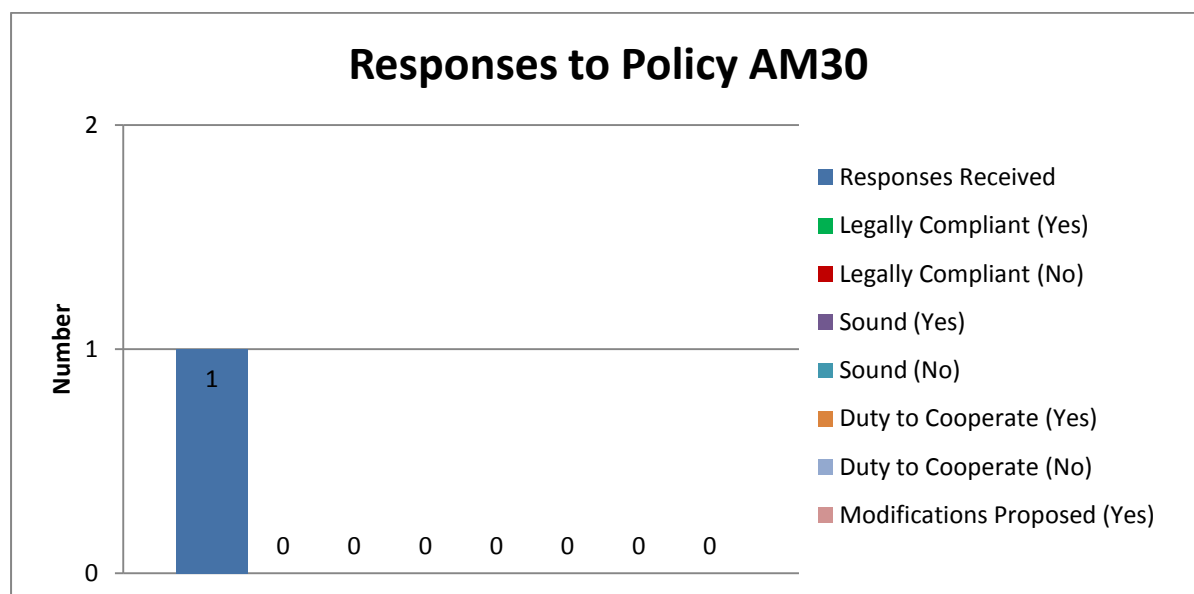
- Policy AM13 - Transport and Accessibility in Wyre Forest



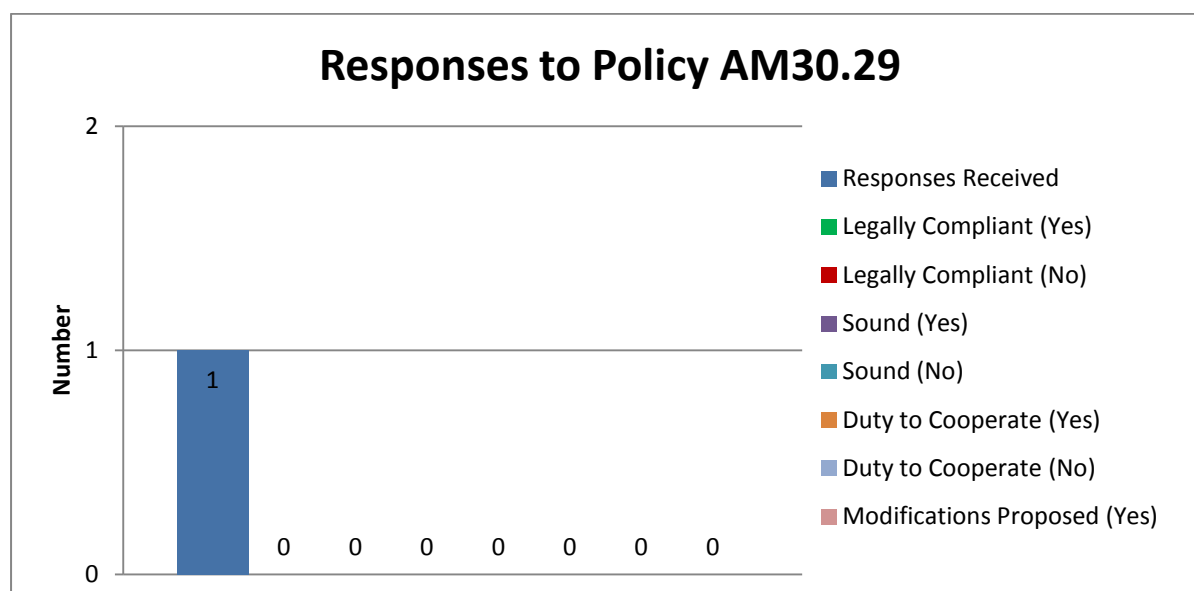
Chapter 9: Amendments to Chapter 30 of the Pre-Submission document (2018) – Kidderminster Town

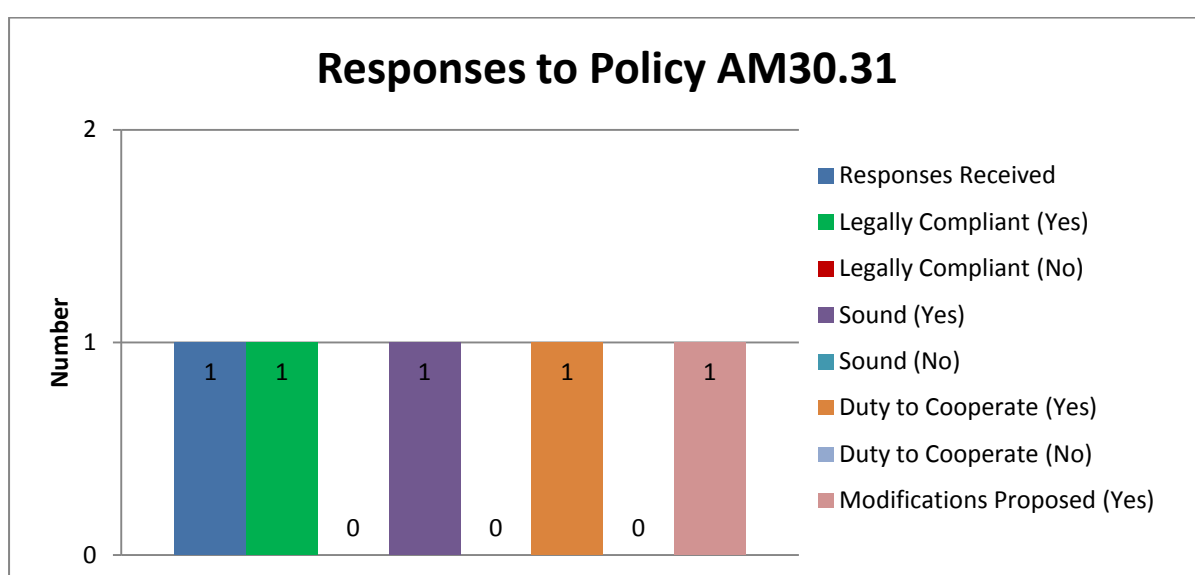
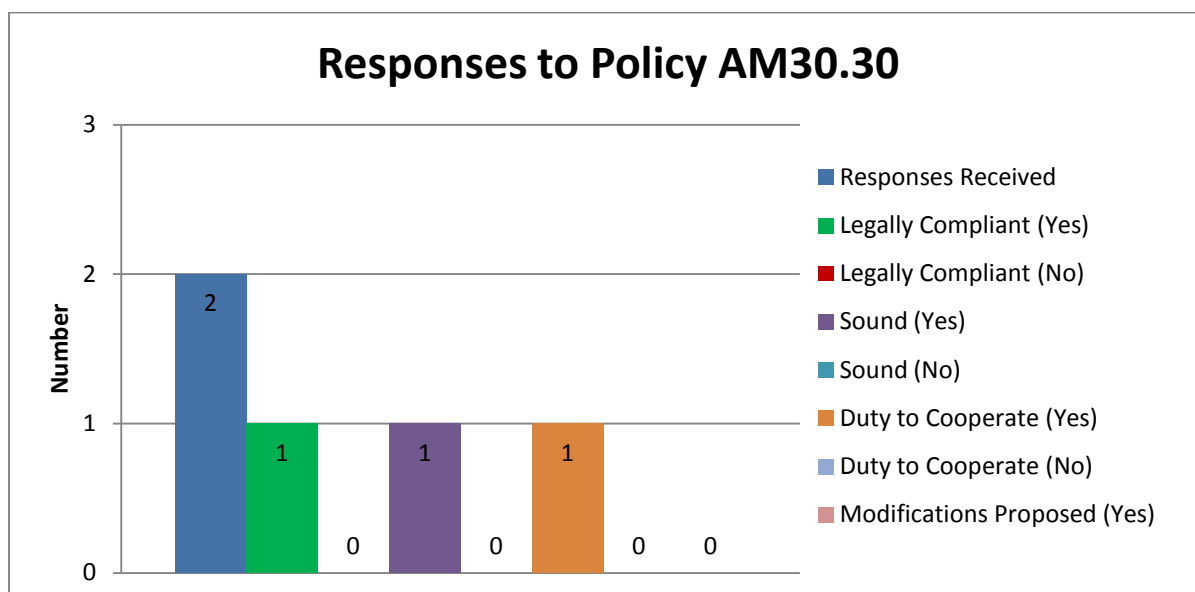
The following policies were updated in this chapter of the amendments document:

- Policy AM30 - Kidderminster Town
- Policy AM30.22 - Land rear of Zortech Avenue LI/10
- Policy AM30.29 - Former Burlish Golf Course Clubhouse LI/12
- Policy AM30.30 - Land off Zortech Avenue LI/13
- Policy AM 30.31 - South Kidderminster Enterprise Park (SKEP)



There were no responses received for Policy AM30.22 Land rear of Zortech Avenue LI/10

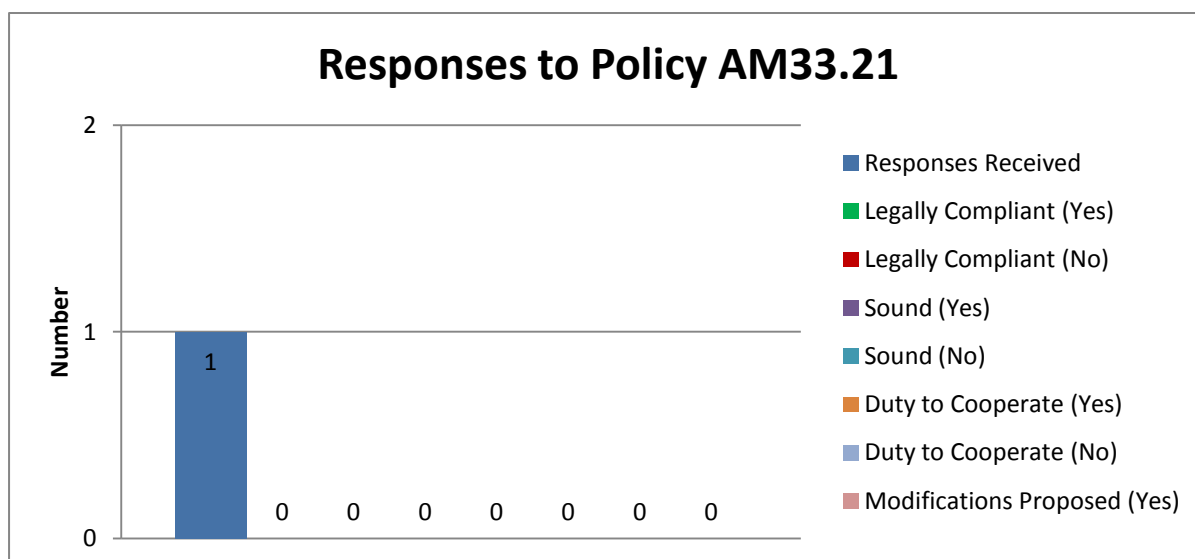
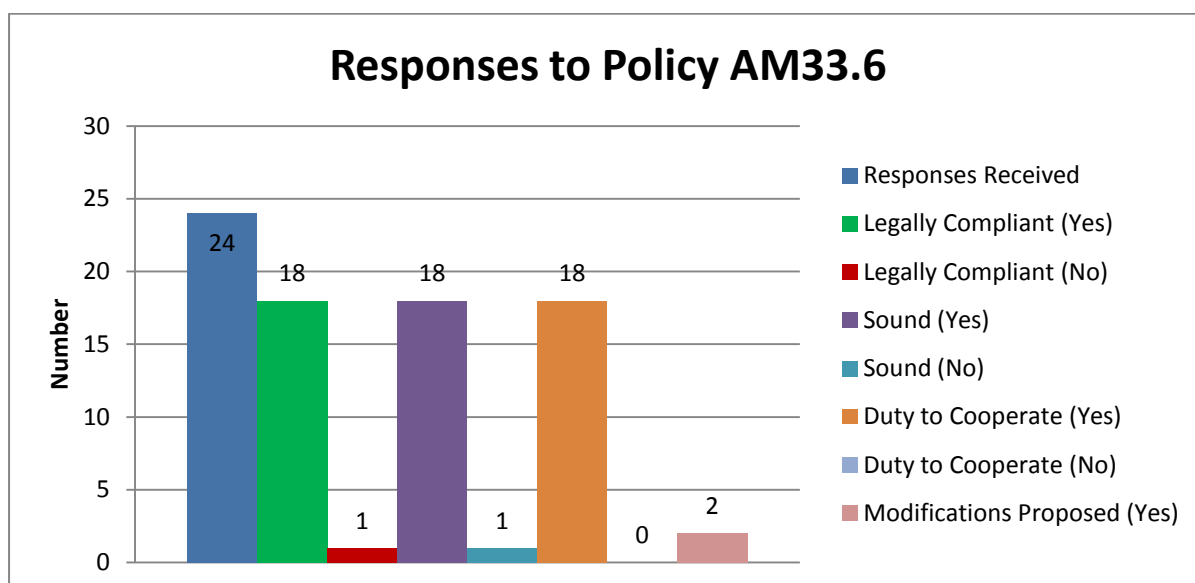
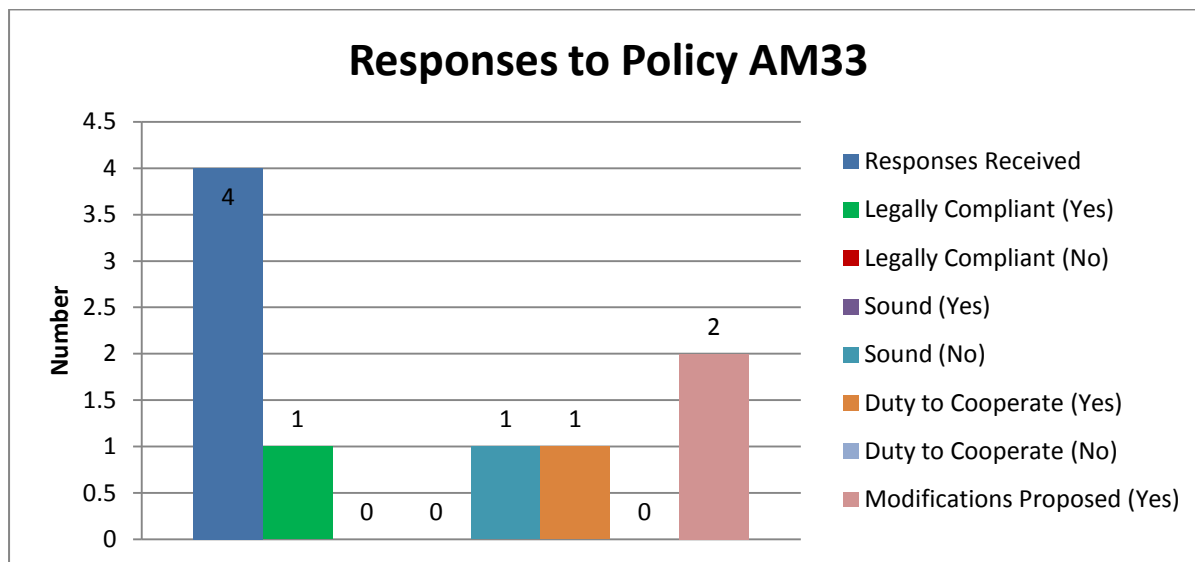




Chapter 10: Amendments to Chapter 33 of the Pre-Submission document (2018) – Stourport-on-Severn.

The following policies were updated in this chapter of the amendments document:

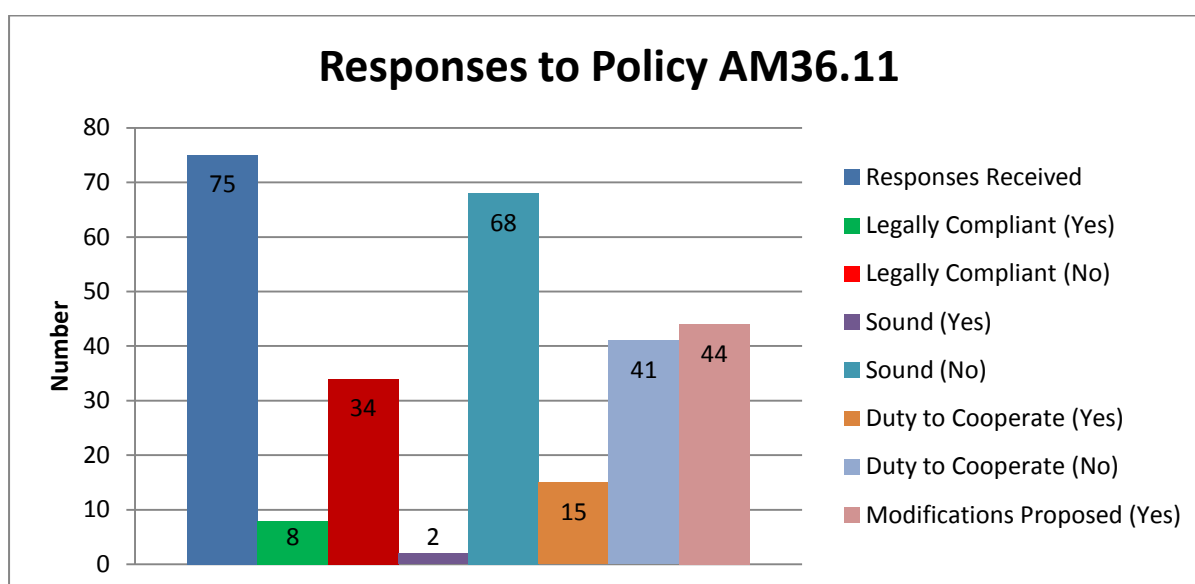
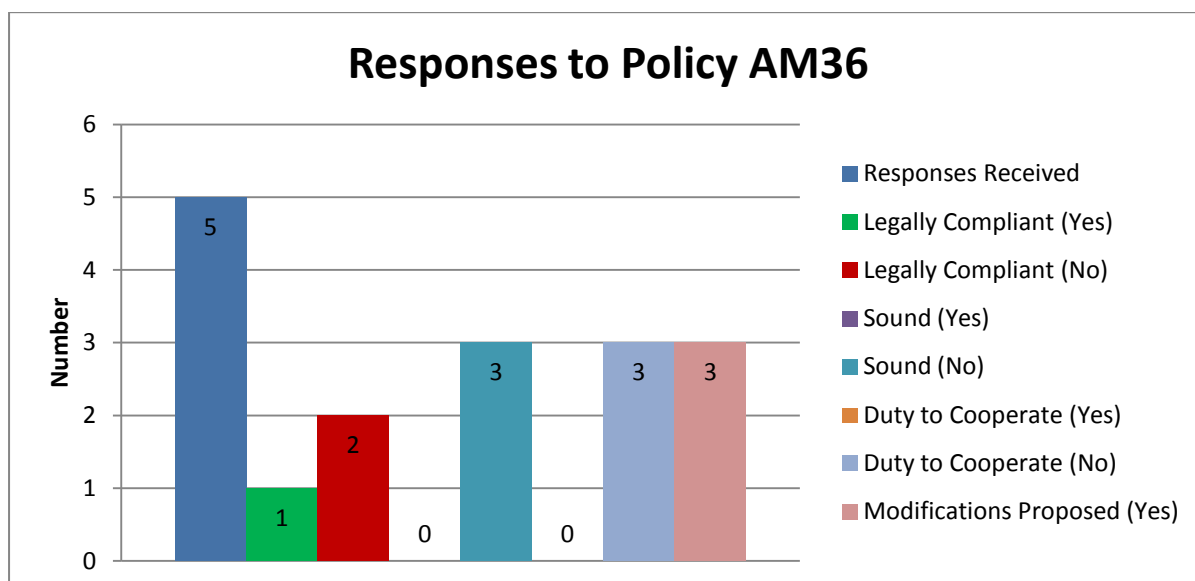
- Policy AM33 - Stourport-on-Severn Site Allocations
- Policy AM33.6 - Yew Tree Walk AKR/18
- Policy AM33.21 - Minster Road Outdoor Sports Area



Chapter 11: Amendments to Chapter 36 of the Pre-Submission document (2018) – Rural Wyre Forest

The following policies were updated in this chapter of the amendments document:

- Policy AM36 - Villages and Rural Area Site Allocations
- Policy AM36.11 - Land off Station Drive, Blakedown WFR/CB/3



Chapter 12: Amendments to Chapter 37 of the Pre-Submission document (2018) – Monitoring and Implementation Framework

There were no policies in this chapter of the amendments document.

7) Withdrawal of responses to the Pre-Submission Publication document consultation held in 2018

A number of respondents completed the box wishing to withdraw their previous comments made to the 2018 consultation.

The Council received 62 responses that indicated that their previous comments were to be withdrawn. Tables showing these comments can be seen at Appendix E of this document.

Wyre Forest District Local Plan Pre-Submission Publication 2019

Consultation Response Form

2 September – 14 October 2019

REF OFFICE USE ONLY:

Representor number:

Representation number:

Plan reference:

Tests of soundness:

This form has two parts: **Part A** Personal Details and **Part B** Your Comments

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has issued this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the public examination. Using the form to submit your comments also means that you can register your interest in speaking at the examination.

Please read the guidance notes carefully before completing the form. If you responded to the last Pre-Submission consultation held in 2018, you do not have to respond again unless you want to add to them, withdraw them or make completely new comments.

Please fill in a separate part B for each issue/comments you wish to make.

Any additional sheets must be clearly referenced. This form can be submitted electronically. If hand writing, please write clearly in blue or black ink.

Consultation response forms can be completed and submitted online at www.wyreforestdc.gov.uk/localplanreview

Comments must be received by 5:00pm on 14 October 2019. Comments received after this time will not be considered.

Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		
First Name		
Last Name		
Organisation (where relevant)		
Job title (where relevant)		
Address – line 1		
Address – line 2		
Address – line 3		
Postcode		
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each comment

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

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

Name or Organisation

3. Did you submit a consultation response form to the last Pre-Submission consultation held in 2018?

Yes

No

a) If yes, would you like to withdraw any/all of your previous comments?

Yes, all

Yes, specific comments

b) If specific comments only, please specify which ones?

Expand Box / Continue on a separate sheet if necessary

4. To which document of the Local Plan does this representation relate?

Amendments to Pre-Submission Local Plan (July 2019 version)

Yes

No

Pre-Submission Local Plan (October 2018 version)

Yes

No

5. Please specify which part of the Local Plan you are commenting on (e.g. paragraph, policy, map, table or figure reference)?

Paragraph

Policy

Other: e.g. Policies map, table, figure, key diagram

6. Do you want to support/object/comment on this part of the Local Plan?:

Support

Comment

Object

7. Do you consider the Local Plan is:

a) Legally Compliant	Yes <input type="text"/>	No <input type="text"/>
b) Sound	Yes <input type="text"/>	No <input type="text"/>
c) Complies with the Duty to co-operate	Yes <input type="text"/>	No <input type="text"/>

8. If you answered ‘No’ to Question 7b, please specify on what grounds you consider the Local Plan to be unsound? (see guidance notes part 3 for explaining of terms)

Positively Prepared ☐

Justified ☐

Effective ☐

Consistent with National Policy ☐

Please Tick as appropriate

9. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Expand Box / Continue on a separate sheet if necessary

10. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 9 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Expand box / continue on a separate sheet if necessary

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

11. If your representation is seeking a modification, do you consider it necessary to speak at the examination?

☐

No I do not wish to speak at the examination.

☐

Yes I would like to speak at the examination.

12. If you wish to speak at the examination, please outline why you consider this to be necessary:

Expand box / continue on a separate sheet if necessary

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to speak at the examination.

13. Are there any other comments you would like to make?:

Expand box / continue on a separate sheet if necessary

Data Protection

The information you provide on the form will be stored on a database used solely in connection with the Local Plan. Representations will be available to view on the council's website, but address, signature and contact details will not be included. However, as copies of representations must be made available for public inspection, they cannot be treated as confidential and will be available for inspection in full. Copies of all representations will also be provided to the Planning Inspectorate as part of the submission of the Wyre Forest District Local Plan. By submitting this form you are agreeing to these conditions.

Please see the Councils Data Protection and Privacy statement:

<http://www.wyreforestdc.gov.uk/the-council/data-protection-and-privacy.aspx>

By signing this form you are agreeing to The Council’s Data Protection Policy above and the storage of your information.

Signature

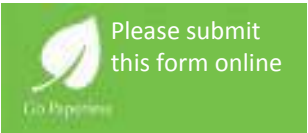
Date

Please return the completed form by **no later than 5:00pm on 14 October 2019** to:

Email: LPR@wyreforestdc.gov.uk

Or post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

Consultation response forms can be completed and submitted online at: www.wyreforestdc.gov.uk/localplanreview



**Wyre Forest District Council – Local Plan Pre-Submission Consultation
(re-opening of consultation)**

Guidance Note for Consultation Response Form

1) Where can I view the Wyre Forest Local Plan Pre-Submission Publication Consultation documents?

You can view the Local Plan consultation documents:

- **Online** via our website: www.wyreforestdc.gov.uk/localplanreview
- Council Offices:
 - Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF
 - The Hub (Customer Service Centre), Kidderminster.
- Libraries:
 - Kidderminster Library – Market Street, Kidderminster, DY10 1AB
 - Stourport Library – Civic Centre, New Street, Stourport on Severn, DY13 8UN
 - Bewdley Library – Dog Lane, Bewdley, DY12 2EF

Or by visiting any of the drop-in sessions being held during the public consultation period.

List of Drop-in Sessions:

Date	Time	Venue
Wednesday 11 September 2019	3pm to 6pm	Blakedown Parish Rooms 18 Belbroughton Road Blakedown DY10 3JG
Wednesday 18 September 2019	3pm to 7pm	Corn Exchange Kidderminster Town Hall DY10 1DB
Thursday 19 September 2019	2pm to 4:30pm	Wribbenhall Parish Rooms Bewdley DY12 1DQ
Saturday 28 September 2019	10am to 1pm	Stourport Civic Hall DY13 8UJ

2) What if I responded to the last consultation held in 2018?

Anyone who previously submitted a response to the last Pre-Submission consultation held in 2018 will not have to do so again unless they want to add to them, withdraw them or make completely new comments. All responses received during the last consultation will still be submitted to the Planning Inspectorate (unless we have received a request to withdraw a response).

3) What can I make comments on?

You can make comments on any part of the Pre-Submission Publication Document (October 2018), Amendments to the Pre-Submission Publication Document (July 2019), Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical evidence base documents. The purpose of this consultation is for you to say whether you think the plan is legally compliant and ‘sound’. These terms are explained as follows:-

Legal compliance

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).

Soundness

Soundness is explained in paragraph 35 of the National Planning Policy Framework (NPPF). The Planning Inspector conducting the Examination in Public has to be satisfied that the Local Plan is ‘sound’ – namely that it is:

- **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 National Planning Policy Framework (NPPF).

4) Do I have to use the consultation response form?

Yes please. This is because further changes to the Local Plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible. Use one response form for each representation you wish to make (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please make sure that it is clearly referenced. It will be a matter for the Planning Inspector to invite additional evidence in advance of, or during the Public Examination.

Additional consultation response forms can be downloaded from the council’s website at www.wyreforestdc.gov.uk/localplanreview or you can use the **online consultation portal** to submit your comments. Hardcopies can also be collected from the main council offices and The Hub (Customer Service Centre). If you want your comments considered by the Planning Inspector you must provide your name and address with your response.

Please note that representations made at this stage in the process cannot remain anonymous, but details will only be used in relation to the Wyre Forest District Local Plan Review. Your response will be made available to view as part of the Examination process.

We will only accept responses submitted using the consultation response form.

5) Can I submit a response on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single response that represents that view, rather than for a large number of individuals to send in separate comments that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the response has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The response should still be submitted on the standard consultation response form with the information attached. Please indicate in Part A of the consultation response form the group you are representing.

6) Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation at a hearing session during the Public Examination. You should note that Planning Inspectors do not give any more weight to issues presented in person than written evidence. The Planning Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

7) Where do I send my completed consultation response form?

Please return the completed consultation response form by **5pm on Monday 14 October 2019**.

Response forms may be submitted to the council in the following ways:

Online at: www.wyreforestdc.gov.uk/localplanreview (complete online or download available)

Email to: LPR@wyreforestdc.gov.uk

Post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF.

Please note that late response forms cannot be accepted.



Helen Smith
Spatial Planning Manager

tel: 01562 732928

email: LPR@wyreforestdc.gov.uk

my ref: HS/HET/RLPPS

your ref:

date: 28 August 2019

Dear Sir/Madam

Wyre Forest District Local Plan Review Pre-Submission Publication Consultation (Regulation 19)

Wyre Forest District Council is re-opening the Local Plan Pre-Submission Publication consultation, which runs from 2 September 2019 until 5pm on 14 October 2019.

The Local Plan Pre-Submission Publication documentation will be available to view and download from the Council's website at: www.wyreforestdc.gov.uk/localplanreview from Monday 2 September 2019.

Officers will also be available to discuss the Pre-Submission Publication consultation at a series of drop-in sessions throughout the district. Please see the Statement of Representation Procedure document, which accompanies this letter for more information.

The Local Plan identifies where development sites for homes and business will be and the services and infrastructure needed to support them. The Council has made a few amendments to the Pre-Submission version of the Plan that was consulted on at the end of last year. This includes changes to the transport infrastructure, the removal of the site at Yew Tree Walk in Stourport-on-Severn and the inclusion of land at Blakedown Railway Station. The amendments to the Local Plan are shown in the document 'Amendments to the Pre-Submission Publication Document (July 2019)', which is available to view on the Council's website.

Economic Prosperity and Place Directorate

Wyre Forest House
 Finepoint Way
 Kidderminster
 Worcestershire
 DY11 7WF

Mike Parker, Corporate Director: Economic Prosperity and Place

If you responded to the last Pre-Submission consultation held in 2018, you do not have to respond again unless you want to add to them, withdraw them or make completely new comments. Comments should be made on the consultation response form available from the Council's website.

Representations must be received by **5pm on Monday 14 October 2019** and should be made on a consultation response form. Response forms are available on the Council's website (www.wyreforestdc.gov.uk/localplanreview) and can be completed online using the consultation portal. Alternatively, hard copies are available from the Council's main reception at Wyre Forest House or from The Hub, (Customer Service Centre), Kidderminster.

Any representation received will be considered alongside the Local Plan when it is submitted for Examination in Public. The purpose of the Examination is to consider whether the Local Plan complies with relevant legal requirements for producing Local Plans, including the Duty to Co-operate, and meets the national tests of 'soundness' for Local Plans. Therefore, representations submitted at this stage must only be made on these grounds and, where relevant, be supported with evidence to demonstrate why these tests have not been met.

Legal compliance

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).

Soundness

Soundness is explained in paragraph 35 of the National Planning Policy Framework (NPPF). The Planning Inspector conducting the Examination in Public has to be satisfied that the Local Plan is 'sound' – namely that it is:

- **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 National Planning Policy Framework (NPPF).

To help you respond, the Council has produced Guidance Notes as part of the consultation response form. It is recommended that you read this note fully before responding. The guidance notes are available on the Council's website:

www.wyreforestdc.gov.uk/localplanreview

At this stage, unless you indicate you wish to appear at the Examination to make a representation, you will not have the right to so do. Any written representations made will be considered by the independent Planning Inspector.

All of the consultation documents and further evidence base documents published at previous rounds of consultation will also be available on the Council's website from 2 September 2019.

If you require any further information on the consultation please contact the Planning Policy Team on 01562 732928.

Yours faithfully

Helen Smith
Spatial Planning Manager

Enc. Statement of Representation Procedure

Wyre Forest District Council
Statement of Representations Procedure
and
Statement of the Fact that the proposed Submission Documents are Available for
Inspection and how they can be Inspected
Wyre Forest District Local Plan Development Plan Document
The Town and Country Planning (Local Planning) (England) Regulations 2012
Regulation 19 – Wyre Forest District Local Plan Pre-Submission Publication

Wyre Forest District Council (“the Council”) has produced the publication version of the Wyre Forest Local Plan Review and is proposing to submit this version of the Wyre Forest Local Plan to the Secretary of State. The Council is now publishing this version of the Wyre Forest Local Plan in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

Title of Document: Wyre Forest District Local Plan Pre-Submission Publication (including amendments document)

Subject Matter: The Wyre Forest Local Plan Pre-Submission Publication sets out how and where development will take place in the administrative area of Wyre Forest District (“the District”) and guides future planning decisions up to 2036. The Local Plan, when adopted, will form part of the development plan for the District.

Area Covered: Whole of the administrative area of the Wyre Forest District.

Publication Period: Monday 2nd September 2019 until 5pm on Monday 14th October 2019.

All representations on the document must be **received by the Council no later than 5pm on Monday 14th October 2019. Please note that late representations cannot be accepted.** This statement provides details on how to make representations.

Statement of fact – How to view the documents

During this public consultation period, copies of the Wyre Forest District Local Plan Pre-Submission Publication and other proposed submission documents listed below will be available to view on the Council’s website at www.wyreforestdc.gov.uk/localplanreview and will also be available for inspection at the following locations:

Council Offices:

- Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF
- The Hub (Customer Service Centre), Kidderminster.

Libraries:

- Kidderminster Library – Market Street, Kidderminster, DY10 1AB
- Stourport Library – Civic Centre, New Street, Stourport on Severn, DY13 8UN

- Bewdley Library – Dog Lane, Bewdley, DY12 2EF

Drop-in Sessions:

Copies of the documents will also be made available at the drop-in sessions being held throughout the district during the consultation period. The drop-in sessions are as follows:

Date	Time	Venue
Wednesday 11 th September 2019	3pm to 6pm	Blakedown Parish Rooms 18 Belbroughton Road Blakedown DY10 3JG
Wednesday 18 th September 2019	3pm to 7pm	Corn Exchange Kidderminster Town Hall DY10 1DB
Thursday 19 th September 2019	2pm to 4:30pm	Wribbenhall Parish Rooms Bewdley DY12 1DQ
Saturday 28 th September 2019	10am to 1pm	Stourport Civic Hall DY13 8UJ

Documents which are available to view:

- Amendments to the Pre-Submission Publication Document (including amendments to Policies Map) (July 2019)
- Wyre Forest District Local Plan Pre-Submission Publication Policies Maps (July 2019)
- Wyre Forest District Local Plan Pre-Submission Publication Document (October 2018)
- Sustainability Appraisal incorporating Strategic Environmental Assessment

There are also a considerable number of supporting documents and evidence base reports which underpin the Local Plan and these can be viewed on the consultation page at:

www.wyreforestdc.gov.uk/localplanreview

Representations:

Representations on the plan can be made throughout the consultation period but must be made before **5pm on Monday 14th October 2019**. Please note that late representations cannot be accepted. All representations should include your name and postal address.

To structure your response in the way the Planning Inspector will consider comments at the public examination, the consultation response form follows a similar structure to the standard response form issued by the Planning Inspectorate. This is so consultation responses are set out in the way the Planning Inspector will consider comments at the public examination. The consultation response form will be made available on the Council's website: www.wyreforestdc.gov.uk/localplanreview

We will only accept responses submitted using the consultation response form.

The Council strongly encourages responses to be submitted using the on-line response form via the District Council's interactive consultation system; however, you can submit response forms in any of the following ways:

Online at: www.wyreforestdc.gov.uk/localplanreview

Via email to: LPR@wyreforestdc.gov.uk

Post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF.

Alternatively you can collect a response form from the main reception at Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF, or from The Hub, (Customer Service Centre) at Kidderminster.

All individual representations received will be submitted to the Secretary of State together with a summary of the main issues raised during the consultation period and considered as part of a public examination by an independent Planning Inspector. (Note that all consultation responses previously received by the Council during the Pre-Submission consultation held last year in Autumn/Winter 2018 will also be submitted to the Planning Inspector). Representations at this stage should only be made on the legal and procedural compliance and the soundness of the Wyre Forest District Local Plan Pre-Submission Publication Documents, and whether it is in conformity with the Duty to Co-operate. Please refer to the guidance on the consultation response form when preparing representations.

Please note that representations made at this stage in the process cannot remain anonymous, but details will only be used in relation to the Wyre Forest District Local Plan Review. Your response will be made available to view as part of the Examination process.

Request for Notification:

Representations at this stage may be accompanied by a request to be notified about:

- The submission of the local plan for independent examination;
- The publication of the recommendations of the inspector appointed to carry out the independent examination; and
- The adoption of the Local Plan.

For further details, please visit the consultation webpages at:

www.wyreforestdc.gov.uk/localplanreview

If you have any questions about the plan which are not covered by this statement of representations or the material published on the Council's website or available at the Council's offices, please contact the Planning Policy Team on email: planning.policy@wyreforestdc.gov.uk



Wyre Forest
District Council

Our Local Plan 2016-36

Pre-Submission consultation

Have your say

The Council is re-opening the Local Plan Pre-Submission consultation. The Local Plan identifies where development sites for homes and business will be and the services and infrastructure needed to support them.

If you've commented before, you don't need to respond again unless you wish to change or add to previous comments.



Name
Address 1
Address 2
Address 3
Address 4
Postcode

Return address: Wyre Forest District Council, Finepoint Way,
Kidderminster, Worcestershire DY11 7WF

We have made a few amendments to the Pre-Submission version of the Local Plan we consulted on at the end of last year, so we are re-opening the consultation. Find out more about the changes and consultation:

- Visit our website: **www.wyreforestdc.gov.uk/localplanreview**
- View the documents at Kidderminster, Stourport and Bewdley libraries, Wyre Forest House or The Hub in Kidderminster
- Come along to any of our drop-in sessions

Date	Location	Time
Wednesday 11 September 2019	Blakedown Parish Rooms, 18 Belbroughton Road, Blakedown, DY10 3JG	3pm – 6pm
Wednesday 18 September 2019	Corn Exchange, Kidderminster Town Hall, DY10 1DB	3pm – 7pm
Thursday 19 September 2019	Wribbenhall Parish Rooms, Bewdley, DY12 1DQ	2pm – 4:30pm
Saturday 28 September 2019	Stourport Civic Hall, DY13 8UJ	10am – 1pm

- To comment you must use a Local Plan Consultation Response form
- Visit **www.wyreforestdc.gov.uk/localplanreview** or pick one up from a drop-in session, The Hub in Kidderminster or Wyre Forest House
- Deadline **5pm, Monday 14 October 2019**



Helen Smith
Spatial Planning Manager

tel: 01562 732928

email: LPR@wyreforestdc.gov.uk

my ref: HS/HET/RLPPS

your ref:

date: 22 August 2019

Dear Sir/Madam

Wyre Forest District Local Plan Review
Pre-Submission Publication Consultation (Regulation 19)

Wyre Forest District Council is re-opening the Local Plan Pre-Submission Publication consultation, which runs from 2 September 2019 until 5pm on 14 October 2019.

The Local Plan Pre-Submission Publication documentation will be available to view and download from the Council's website at: www.wyreforestdc.gov.uk/localplanreview from Monday 2 September 2019.

Officers will also be available to discuss the Pre-Submission Publication consultation at a series of drop-in sessions which Parish Councillors would be welcome to attend. The dates and times of these are included in the attached consultation poster for information. The Council would be grateful if you could display this consultation poster on the Parish Council's notice board.

If you responded to the last Pre-Submission consultation held in 2018, you do not have to respond again unless you want to add to them, withdraw them or make completely new comments. Comments should be made on the consultation response form available from the Council's website. If you would like to discuss the Local Plan Review in more detail then please contact the Planning Policy Team on 01562 732928.

Yours faithfully

Helen Smith
Spatial Planning Manager
Enc. Consultation Poster

Economic Prosperity and Place Directorate

Wyre Forest House
Finepoint Way
Kidderminster
Worcestershire
DY11 7WF

Mike Parker, Corporate Director: Economic Prosperity and Place



Helen Smith
Spatial Planning Manager

tel: 01562 732928

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Officers will also be available to discuss the Pre-Submission Publication consultation at a series of drop-in sessions which Town Councillors would be welcome to attend. The dates and times of these are included in the attached consultation poster for information. The Council would be grateful if you could display this consultation poster on the Town Council's notice board.

If you responded to the last Pre-Submission consultation held in 2018, you do not have to respond again unless you want to add to them, withdraw them or make completely new comments. Comments should be made on the consultation response form available from the Council's website. If you would like to discuss the Local Plan Review in more detail then please contact the Planning Policy Team on 01562 732928.

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Economic Prosperity and Place Directorate

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Worcestershire
DY11 7WF

Mike Parker, Corporate Director: Economic Prosperity and Place



Wyre Forest
District Council

Our Local Plan 2016-36

Pre-Submission consultation

Have your say

The Council is re-opening the Local Plan Pre-Submission consultation to give people another chance to have their say.
If you've commented before you don't need to respond again unless you wish to change or add to previous comments.



The Local Plan identifies where development sites for homes and business will be and the services and infrastructure needed to support them. We have made a few amendments to the Pre-Submission version of the Plan we consulted on at the end of last year. This includes, changes to the transport infrastructure, we have taken out the Yew Tree Walk site in Stourport and included land at Blakedown Railway station.

Find out more:

- Visit our website:
www.wyreforestdc.gov.uk/localplanreview
- View the documents at Kidderminster, Stourport and Bewdley libraries, Wyre Forest House or The Hub in Kidderminster.
- Come along to any of our drop-in sessions to find out more:

Date	Location	Time
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Saturday 28 September 2019	Stourport Civic Hall, DY13 8UJ	10am – 1pm

How to comment:

- Comment online at www.wyreforestdc.gov.uk/localplanreview or pick up a Consultation Response Form from any drop-in session, The Hub (Customer Service Centre) Kidderminster or Wyre Forest House, Finepoint Way, Kidderminster
- Deadline for comments: **5pm, Monday 14 October 2019**
- Comments must be submitted using the Council's Local Plan Consultation Response Form.

Wyre Forest District Local Plan Pre-Submission Publication

Consultation Plan – September 2019

1.0 Background

1.1 It is a cornerstone of the planning system that communities and stakeholders should be able to influence the matters addressed in planning policy. The National Planning Policy Framework (NPPF) published in July 2018 reinforces the importance of community involvement in paragraph 15: *“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”* In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Wyre Forest District Local Plan Pre-Submission Publication document has been published to allow representations to be made before it is submitted to the Secretary of State. The consultation on the Local Plan Pre-Submission Publication document (known as the Publication document) is being re-opened for further representations to be made and will run from 2nd September to 14th October 2019. All representations received will be submitted with the draft Local Plan to the Secretary of State for examination in public. (Note that all the consultation responses previously received by the Council during the Pre-Submission consultation held last year in Autumn/Winter 2018 will also be submitted to the Planning Inspector).

1.2 At this publication stage, the full Sustainability Appraisal report is also available for consultation. This report includes a non-technical summary setting out the key stages in the Sustainability Appraisal process and the main findings.

2.0 What is the Local Plan Review?

2.1 The Pre-Submission Publication document is the latest stage in the preparation of the Wyre Forest Local Plan Review which sets out the long-term vision and strategic context for managing and accommodating growth within the district until 2036. The aim of the Local Plan is to set out:

- The areas where development will take place;
- The areas that will be protected; and
- Policies that will be used to determine planning applications.

2.2 Under the planning system most development needs planning permission. The principal basis for making those decisions is the development plan; the Local Plan once adopted will form the main part of it for Wyre Forest District, replacing the currently adopted Local Plan.

3.0 Adopted Statement of Community Involvement Requirements

3.1 The District Council first adopted its Statement of Community Involvement (SCI) in 2006. Following changes in legislation the SCI was updated, revised and adopted in February 2013. The SCI sets out the Council's policy for involving the community in the planning process. It also details how the Council intends to involve all sections of the community and provides guidelines and minimum

standards to involve the community, interest groups and stakeholders in the production of Local Development Documents. The statement provides guidance on:

- How people will have the chance to make representations on the draft Local Plan, and the process for considering and responding to their views.
- The Examination in Public.
- How the District Council will keep the community informed on progress and outcomes.

3.2 The Statement of Community Involvement (2013) can be viewed on the Council's website here:

<http://www.wyreforestdc.gov.uk/planning-and-buildings/planning-policy/statement-of-community-involvement.aspx>

4.0 The Duty to Cooperate

4.1 The duty to cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It 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 Plan preparation in the context of strategic cross boundary matters.

4.2 In order to fulfil the requirements of the Duty to Cooperate, all neighbouring authorities and consultation bodies covered by the Duty to Cooperate will receive a consultation form to complete which will allow any concerns to be raised. This will provide an audit trail to demonstrate that the Duty has been fully considered and complied with. Where cross-boundary issues are identified, officers will offer to meet with each of the neighbouring authorities or organisations concerned to discuss the issues and how the Plan can best address them. In line with NPPF requirements, Statements of Common Ground will be prepared where necessary.

5.0 Targeting Consultation and Methods

5.1 The District Council will actively seek to engage all community groups within the Wyre Forest District. Local planning authorities are required to consult specific bodies which they consider may have an interest in the proposed Local Plan document and other consultation bodies which it considers are appropriate. A list of the specific consultees for Wyre Forest District is set out in Appendix A to this document.

5.2 It is proposed to consult in a variety of ways. Examples include drop-in sessions in Kidderminster, Stourport-on-Severn, Bewdley and Blakedown, mini poster displays in a wide range of accessible locations throughout Wyre Forest District, a press release to be circulated to the local newspapers

and radio stations as well as a leaflet distribution to householders within the District. All Town and Parish Councils will be sent a consultation notice and be asked to display it on their notice boards.

6.0 Involving Harder-to-reach Groups

6.1 Within the District there are groups which are hard to reach through consultations. The District Council recognises that these groups in particular may have different levels of access to information and therefore may find it harder to get involved in the decision making process. In particular, the District Council will employ the following methods for engaging hard to reach groups: leaflet distribution to households within Wyre Forest District, drop-in sessions at public locations (detailed at 7.2).

7.0 Drop-in Sessions

7.1 During the six week public consultation on the Local Plan Pre-Submission Publication a number of drop-in sessions will be held. These will be staffed at highly accessible public locations in the main towns of Kidderminster, Stourport-on-Severn and Bewdley. There will also be a drop-in session held in Blakedown. Display boards will be erected at the drop-in sessions and copies of the Pre-Submission Publication document will be made available for public viewing along with other materials, such as evidence base documents. Staff will also be on hand to answer any queries raised by the public.

7.2 Location of Drop-in Sessions

Date	Time	Venue
Wednesday 11 th September 2019	3pm to 6pm	Blakedown Parish Rooms 18 Belbroughton Road Blakedown DY10 3JG
Wednesday 18 th September 2019	3pm to 7pm	Corn Exchange Kidderminster Town Hall DY10 1DB
Thursday 19 th September 2019	2pm to 4:30pm	Wribbenhall Parish Rooms Bewdley DY12 1DQ
Saturday 28 th September 2019	10am to 1pm	Stourport Civic Hall DY13 8UJ

7.3 ***Poster Displays***

The Council will request that posters are displayed at the following locations throughout the duration of the Local Plan Pre-Submission Publication consultation:

- Kidderminster Library
- Stourport Library
- Bewdley Library

KIDDERMINSTER

- Wyre Forest Town Hall
- Wyre Forest Leisure Centre
- Tesco Superstores
- Sainsburys
- Morrisons
- Asda
- Iceland
- Hodge Hill Garden Nurseries
- Barnetts Hill Garden Centre

STOURPORT

- Stourport Civic Hall
- Tesco
- Co-op
- Lidl
- Cooks Garden Centre

BEWDLEY

- Bewdley Museum
- Bewdley Leisure Centre
- Co-op
- Tesco

RURAL AREAS

- Wyre Forest Discovery Centre
- Cookley – Tesco and/or Post Office
- Blakedown Post Office
- Chaddesley Corbett Post Office
- Wolverley Stores
- Fairfield Shop
- Upper Arley Post Office
- Rowberry Farm Shop
- Far Forest Post Office/stores
- Colliers Farm Shop and/or Clows Top Post Office

8.0 Awareness raising – Media

- 8.1 To coincide with the launch of the consultation on the Local Plan Pre-Submission Publication press releases will be organised for the local newspapers, such as the Kidderminster Shuttle. A publicity leaflet will be delivered to households throughout the district. The leaflet will detail the dates and times of the drop-in sessions and details of places where the Pre-Submission Local Plan Publication document can be viewed/downloaded.

9.0 Publishing on the Web

- 9.1 An interactive version of the Pre-Submission Publication document will be made available to enable electronic representations to be made. The interactive consultation response form can be filled in via the On-line portal or downloaded and emailed to LPR@wyreforestdc.gov.uk. The Council strongly encourages responses to be submitted using the on-line response form via the Council's interactive consultation system. (See section 10 below for full details on how to comment).
- 9.2 The evidence base documents will also be made available on the Council's website and copies will also be made available at the consultation drop-in sessions (see 7.2 for venues).
- 9.3 The District Council will also use social media (Twitter and Facebook) to promote the consultation period and the drop-in sessions.

10.0 How to Comment on the Local Plan Pre-Submission Publication document

10.1 The six week consultation of the Pre-Submission Publication will start on Monday 2nd September 2019 and will close promptly at 5pm Monday 14th October 2019. **No late responses will be accepted.**

10.2 The consultation response form follows a similar structure to the standard response form issued by the Planning Inspectorate. This is so consultation responses are set out in the way the Planning Inspector will consider comments at the public examination. The consultation response form will be made available on the Council's website: www.wyreforestdc.gov.uk/localplanreview. **We will only accept responses submitted using the consultation response form.**

10.3 The Council strongly encourages responses to be submitted using the on-line response form via the District Council's interactive consultation system. Consultation responses will only be accepted if submitted in one of the following ways:

- Via the On-line portal
www.wyreforestdc.gov.uk/localplanreview
- By downloading the form from our website: www.wyreforestdc.gov.uk/localplanreview
- By collecting a hard copy from main reception at Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF or from The Hub (Customer Service Centre) at Kidderminster.
- Forms should be emailed to: LPR@wyreforestdc.gov.uk or posted back to Planning Policy Team, Wyre Forest DC, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF.

Please note that representations made at this stage in the process cannot remain anonymous, but details will only be used in relation to the Wyre Forest District Local Plan Review. Your response will be made available to view as part of the Examination process.

10.4 The purpose of the consultation is to allow interested parties to make representation on the soundness and legal compliance of the plan. The District Council's statement of representation procedure sets out the procedure for making representations to the plan.

10.5 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.

11.0 Formally Processing Comments – Procedures

- 11.1 All consultation response forms submitted to the District Council online, by email or post will be acknowledged within five working days of their receipt. After the Pre-Submission Publication consultation period ends, the Planning Policy Team will consider all of the consultation response forms received during the consultation period and may, as a result, update the Submission version of the Local Plan. A consultation summary report will also be produced detailing the key issues raised from the consultation response forms received. This will be presented to and considered by the Overview and Scrutiny Committee and Cabinet. The consultation summary report will be made available for public viewing on the Council’s website at submission stage of the Local Plan.
- 11.2 The Council will then submit the Submission version of the Local Plan for examination by an independent Government appointed Planning Inspector. The Submission version will be approved by a meeting of the full Council which is expected to happen in February 2020. Consultation response forms received for this Local Plan Pre-Submission Publication document and the updated evidence base studies will be passed to the Planning Inspector. It should be noted that only those who make a representation seeking a change to the plan within the advertised publication consultation period will have the right to appear at the Examination.
- 11.3 The Council anticipates that an examination in public will be held on the Local Plan in Spring 2020 with adoption of the Local Plan taking place in late 2020. However, the timetable after submission is beyond the Council’s control and will be in the hands of the Government appointed Planning Inspector.

Appendix A – List of Consultees

Specific Consultees

Wyre Forest District Parish/Town Councils

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

Adjacent Parish Councils

Abberley Parish Council
Alveley and Romsley Parish Council
Astley & Dunley Parish Council
Bayton Parish Council
Belbroughton and Fairfield Parish Council
Clent Parish Council
Cleobury Mortimer Parish Council
Dodford with Grafton Parish Council
Elmbridge Parish Council
Elmley Lovett Parish Council
Hagley Parish Council
Hartlebury Parish Council
Highley Parish Council
Kinlet Parish Council
Kinver Parish Council
Lindridge Parish Council
Mamble Parish Council
Pensax Parish Council
Shrawley Parish Council
Upton Warren Parish Council

Other Specific Consultees

British Telecom
Birmingham City Council
Bromsgrove District Council
Dudley Metropolitan Borough Council
EE
Environment Agency
Greater Birmingham and Solihull Local Enterprise Partnership
Hereford & Worcester Ambulance Service
Hereford & Worcester Fire & Rescue Service

Appendix A – List of Consultees

Highways England
Historic England
Homes England
Malvern Hills District Council
National Grid
Natural England
Network Rail
NHS England
Office of Rail Regulation
Redditch Borough Council
Sandwell Council
Severn Trent Water
Shropshire Council
Solihull Council
South Staffordshire District Council
South Staffordshire Water Plc
Staffordshire County Council
Staffordshire Police Authority
The Coal Authority
Three
Vodafone and O2
Walsall Council
West Mercia Police
West Midlands Ambulance Service
Western Power Distribution
Wolverhampton City Council
Worcester City Council
Worcestershire County Council
Worcestershire Local Enterprise Partnership
Worcestershire Clinical Commissioning Groups
Worcestershire Regulatory Services
Wychavon District Council

General Consultees

Organisations and individuals registered in the Planning Policy database including:

Agents
Business and Commerce Groups
Conservation Interest Groups
Developers
Housing Interest Groups
Individuals
Interest / Pressure Groups
Land Owners
Local Interest Groups
Registered Providers

Appendix A – List of Consultees

Service Providers

Hard to Reach Groups

- Age UK Bromsgrove Redditch & Wyre Forest
- Derbyshire Gypsy Liaison Group
- Friends Families and Travellers
- National Federation of Gypsy Liaison Groups
- Offmore Comberton Action Group
- The Showman’s Guild of Great Britain Midland Section

Statutory and Specific Consultees

Birmingham City Council
British Telecom
Bromsgrove District Council
Centro- WMPTA
Dudley Metropolitan Borough Council
EE
Environment Agency
Greater Birmingham and Solihull Local Enterprise Partnership
Hereford & Worcester Ambulance Service
Hereford & Worcester Fire & Rescue Service
Highways England
Historic England
Homes England
Malvern District Council
National Grid
Natural England
Network Rail
NHS England
Office of Rail Regulation
Oil and Pipelines Agency (The)
Redditch District Council
Sandwell Council
Severn Trent Water Ltd
Shropshire Council
Solihull Council
South Staffordshire District Council
South Staffordshire Water Plc
Sport England
Staffordshire County Council
Staffordshire Police and Crime Commissioner
The Coal Authority
Three
Vodafone and O2
Walsall Council
West Mercia Police
West Midlands Ambulance Service
Western Power Distribution
Wolverhampton City Council
Worcester City Council
Worcestershire Acute NHS Trust
Worcestershire CCGs
Worcestershire County Council
Worcestershire Local Enterprise Partnership
Worcestershire Regulatory Services
Wychavon District Council

Wyre Forest District Parish/Town Councils

Bewdley Town Council
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Chaddesley Corbett Parish Council
Churchill and Blakedown Parish Council
Kidderminster Foreign Parish Council
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Hartlebury Parish Council
Highley Parish Council
Kinlet Parish Council
Kinver Parish Council
Lindridge Parish Council
Mamble Parish Council
Pensax Parish Council
Shrawley Parish Council
Upton Warren Parish Council