



# **Report to Wyre Forest District Council**

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**an Inspector appointed by the Secretary of State  
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Date: 19<sup>th</sup> October 2010

**PLANNING AND COMPULSORY PURCHASE ACT 2004**

**SECTION 20**

**REPORT ON THE EXAMINATION INTO THE  
WYRE FOREST CORE STRATEGY  
DEVELOPMENT PLAN DOCUMENT**

Document submitted for examination on 9 April 2010

Examination hearings held between 19 and 29 July 2010

File Ref: PINS/R1845/429/4

**Non-technical Summary**

This report concludes that the Wyre Forest Core Strategy provides an appropriate basis for the planning of the District over the next 15 years. The Council has sufficient evidence to support the strategy, can show that it has a reasonable chance of being delivered, and has a good monitoring framework in place.

A limited number of changes are needed to meet legal and statutory requirements and to ensure deliverability and consistency. These can be summarised as follows:

- Updating references to the West Midlands Regional Spatial Strategy;
- Amending Policy DS02 to allow for the mixed use of the former British Sugar Site, Stourport Road, Kidderminster to include an element of enabling residential development and to help deliver essential highways infrastructure;
- Amendments to ensure Water and Flood Risk Management issues are properly assessed at subsequent planning stages and in development management;
- Various other minor changes to achieve maximum clarity, effectiveness, and stakeholder consensus including reference to continuing Green Belt policy.

Most of the changes recommended in this report are based on suggestions put forward by the Council during the Examination in response to points raised by participants.

<b>LEGAL REQUIREMENTS</b>	
Local Development Scheme (LDS)	DPD contained within approved LDS (PD04) August 2008 with submission date of February 2010. Actual submission date: 8 April 2010 – delay insignificant.
Statement of Community Involvement (SCI) and relevant regulations	SCI (SD05) prepared in 2005 and adopted in 2006. Consultation is compliant with the requirements in Regulations (SD07).
Sustainability Appraisal (SA)	Carried out and adequate (Draft SA Jan 2009 – PD11, Final SA Jan 2010 – SD04, Independent quality check June 2009 (SD14)).
Appropriate Assessment (AA)	Habitat Regs Assessment and Appropriate Assessment Screening reports undertaken (ED19 & ED87) - no significant bio-diversity issues – Natural England support conclusions (ED18).
National Policy	DPD complies with National Policy.
Sustainable Community Strategy (SCS)	SCS in place for 2008-14 (EB11) – DPD shows satisfactory regard to it.
2004 Act and Regulations (as amended)	DPD complies with the Act and Regulations.

## **Introduction**

- i. This report contains my assessment of the Wyre Forest Core Strategy Development Plan Document (DPD) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the DPD is compliant in legal terms and whether it is sound. Planning Policy Statement (PPS) 12 (paragraphs 4.51-4.52) makes clear that to be sound, a DPD should be justified, effective and consistent with national policy.
- ii. The starting point for the Examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my Examination is the submitted draft DPD which is the same as the earlier published draft except for a schedule of minor editorial and typographical changes (SD03) which I have taken 'as read' in the interests of clarity and which are not referred to further in this report.
- iii. On submission the Council also submitted a schedule of Minor Amendments (SD02) which sought to respond to the representations made by seeking text changes intended to achieve consensus with stakeholders where possible. In the Council's view these changes did not affect the soundness of the plan. However, inasmuch as they were not subjected to further public consultation they have been examined by me along with the written and oral representations made prior to submission and during the hearings. Where in my view such changes are key to soundness they are shown in bold type
- iv. Some of the Council's changes were relatively minor and could simply be endorsed in the interests of clarity and effectiveness. This includes text alterations to reflect the withdrawal of the formerly emerging Regional Strategy for the West Midlands on which the plan preparation had lent heavily.
- v. However, where the examination considered matters of soundness for which agreement on proposed changes was not reached I report accordingly in some more detail. Appendix A shows the recommended changes resulting from this process while Appendix B is the sole change which I deem necessary to make the plan sound and on which final agreement was not reached during the examination hearings.
- vi. To comply with the legislation it is necessary for all the changes in Appendices A and B to be subject to a recommendation in this report. This is set out in my Overall Conclusion and Recommendation.

## **Legal requirements**

- vii. My conclusions on the legal compliance of the DPD are indicated in the table above.

## **Assessment of Soundness**

This section of the report considers the soundness of the plan. It deals with issues of soundness and subsequent recommendations on the basis of:

those recommended changes which result from discussion and agreement between parties;

those changes which I determine are needed following examination debate but for which agreement was not reached between parties.

### **Preamble**

1. Following submission of the plan in early April the new Coalition Government's commitment to abolition of regional strategies was announced. Also, PPS3 was re-issued with amendment to the definition of previously developed land (excluding private residential gardens), and deletion of the national indicative minimum density of 30 dwellings per hectare. The Council's statement on the implications of these matters for the plan has been published (ED13) and I have taken this, and representors' comments on the same matters, into account. Any resulting judgments on the soundness of the plan are considered in the report.
2. I support the Council's wish to make editorial changes to the plan so that it reflects the up-to-date position with regard to RSS and these are set out, alongside other changes, in Appendix A. For the avoidance of doubt, I endorse these changes as and where they arise in the document text in the interests of clarity and accuracy.
3. Taking account of all representations, written evidence and the discussions at the examination hearings I now examine twelve main issues upon which the soundness of the plan hinges.

### **Issue 1 – Whether the overall spatial strategy is soundly based and in accordance with national planning policies and relevant plans at the local level?**

4. The district's Issues and Challenges in Chapter 2 reflect underlying and cross-cutting themes in the 2008 Sustainable Community Strategy (SCS - EB11) used to help shape the Core Strategy (CS):
  - Adapting to and mitigating climate change
  - Creating a desirable place to live
  - Enabling a good place to do business
  - Helping to create a unique place
5. These key community aims are clearly expressed through the area Vision for 2026 in Chapter 3 which relates them well to those

characteristics of this mixed urban and rural area which make it unique. The table in Chapter 4 clearly relates the SCS Priorities and Development Objectives to the particular strategic policies in the CS. The Vision is no less sound for being expressed in the present tense. Nor, in my view, does it underplay the role of farming in supporting both the local economy and the attractive rural character of the area.

6. The spatial strategy focuses population and employment growth on previously developed land in the two larger towns of Kidderminster and Stourport-on Severn, with a limited amount of growth in Bewdley and the surrounding rural areas to address local needs.
7. The amount of new housing and employment development which the plan seeks to accommodate is examined in detail later in the report. However, in general the Council supports the historical strategic planning policy approach of seeking to prevent out-migration from the West Midlands Major Urban Areas. It considers that its evidence and local support for this principle supports the level and locations of new growth proposed in the plan. Since a key aim of the government is to support local choice I consider that this is a generally sound approach. Consequently, notwithstanding the withdrawal of the formerly emerging Phase 3 WMRSS, I support and endorse the Council's suggested change CC8 which makes this clear.
8. Questions were raised in the representations and during the examination hearing as to whether the proportional split of development between the various locations was appropriate and supported by the evidence.
9. I examine the detail of the proposed distribution on a town-by-town basis later in the report. However, at district-wide level the proposed spatial distribution appears to me to be soundly based on sustainable development principles set out in national policies PPS1, PPG2, PPS3, PPS4, PPS7 and PPS25 and the submitted evidence base.
10. The established West Midlands Green Belt, washes over nearly two thirds of the district. This, and the River Severn Valley and deeply rural nature of the more westerly area beyond the Green Belt, combine to support the focus of necessary development within and close to the main towns. Given these constraints I consider that the towns are properly identified as the preferred option by comparison with the limited choice of any realistic alternatives.
11. Moreover, recent detailed evidence, including a Strategic Housing Land Availability Assessment (SHLAA – EB10) and an Employment Land Review (EB19), demonstrates that there is a relatively healthy supply of previously developed ('brownfield') land now present and likely to come forward within the two main towns. The supply is a result of economic and industrial re-structuring over recent decades which is still continuing. This evidence generally supports the proposed approach since it would make good and effective use of serviced land in the more accessible and sustainable locations.

12. The development split at different levels of settlement is further supported by a Settlement Hierarchy Technical Paper (EB08) which lends credence and support to the proposed five level hierarchy. Certain detailed classifications for the smaller settlements were queried at the examination hearings and I have considered these reservations. However, there is no conclusive evidence to indicate that the classifications are seriously flawed or that re-classification is necessary. With the comprehensive monitoring framework in place the policy appears flexible enough to respond to changing circumstances and to allow smaller settlements to meet local needs where a case is properly supported by evidence at the local level.
13. The area is traversed by two rivers with large catchments, the Severn and Stour, and certain parts are prone to flooding. The Council has approached the issue of flood risk management in accordance with the advice in national policy in PPS25 including the sequential approach to development site identification. The evidence base includes Stages 1 and 2 Strategic Flood Risk Assessments (SFRAs - EB26 & 27) and a Water Cycle Strategy (EB28). It has been instrumental in informing the spatial strategy especially as it relates to proposed new development in the main towns of Kidderminster and Stourport-on-Severn. Subject to the implementation of a strategic Water Management Policy (CP02) the evidence illustrates that the growth strategy for Kidderminster and Stourport-on-Severn is achievable. However, for Bewdley the topography, the risk of flooding and the historic street pattern are such that the evidence clearly points to the need to limit new development largely to that needed to meet local needs only, as set out in Policy DS01.
14. The Environment Agency has made representations about the detailed water management policy framework including seeking detailed wording changes which I consider later. However, it has supported the Council's strategic approach subject to the principles espoused in national guidance in PPS25 being carried forward in both the forthcoming Site Allocations and Policies DPD process and the routine management of development applications.
15. Given the removal of strategic Green Belt policies by the revocation of the WMRSS and the replacement of Structure Plan policies there was concern that the Core Strategy's vision and related strategic policy did not give a clear steer on the constraining nature on new development of the identification of large parts of the district as part of the West Midlands Green Belt. To address this the Council has proposed the addition of explanatory text which makes this overarching policy and its planning implications clear to all plan users. I agree that this is necessary to ensure that the plan is both fully consistent with national policy in PPG2, and likely to be effective in practice. **I therefore recommend the Council's suggested change CC15 as being necessary to make the plan sound.** Pending the preparation of the Site Allocations and Policies DPD the

formerly identified safeguarded land referenced as Areas of Development Restraint (ADR) will be retained on the Proposals Map.

16. In view of all of the above and in the absence of compelling counter evidence I conclude that Policy DS01 'Development Locations' accords with the objectives of national guidance and is supported by up to date, relevant evidence which supports the strategy and renders its spatial principles and proposed settlement hierarchy sound for the plan period to 2026.
17. The Council suggested some minor amendments responding to various representations to clarify the preceding sections of the plan and parts of the explanatory text to the main spatial strategy policy DS01. I endorse the following Council suggested changes in the interests of clarity and increased effectiveness: CC1-14 and CC22. No other changes are necessary to make the policy sound.

**Issue 2 – Whether the amount, distribution and mix of housing and proposed housing land supply is justified and appropriate?**

18. Policies DS01 and DS05 aim to deliver 4,000 net additional dwellings over the plan period. This evolved having regard to the formerly emerging WMRSS which set a requirement for the District of 4,000 dwellings (ie 200 per annum) for 2006 – 2026 (of a regional total of some 397,000). This is the minimum level of new dwellings which the plan seeks to deliver for the district during the plan period. The Council promoted such growth through the EiP process on the basis that it fitted well with the strategic aim to focus a greater level of growth into the West Midlands conurbation including Birmingham and the adjoining Black Country metropolitan districts, as well as suiting local circumstances.
19. Having regard to national policy guidance in paragraph 33 of PPS3 criticism was levelled that this quantum of housing significantly underestimated the predicted growth in household formation over the plan period. This was shown by the government's trend-based 2006 Sub National Household Projections to be in the order of an additional 8,000 households.
20. However, as noted in the SHMA (EB31) the aim of the former emerging WMRSS was to accommodate greater than trend household numbers by developing new dwellings and creating jobs in the Major Urban Areas (MUAs), plus Telford, Nuneaton and Rugby. Despite the coalition government's revocation of the RSS as a vehicle for forward planning of housing and employment numbers there is no clear evidence that the more-or-less agreed (albeit not published) regional policy prescription is no longer to be carried forward by the constituent local planning authorities acting either jointly or severally. Indeed it seems likely (or at least possible) that the nearest MUAs of the Black Country and Birmingham will continue to seek to deliver new housing and jobs at the above-the-trend levels anticipated in the formerly emerging WMRSS.

21. For that reason, and bearing in mind the acknowledged statistical uncertainties associated with long term household projections, I consider that it would be premature to conclude that the Core Strategy has seriously under-estimated the numbers of dwellings likely to be needed to house forming households in the plan period.
22. Nevertheless, in view of the present uncertainties, both about population growth and the changing nature of the forward planning system, it would be prudent for the Council to monitor closely actual household formation alongside new dwelling delivery so that, if an apparent and serious mismatch between the two did occur, the strategy could be subjected to timely review. The Monitoring and Implementation framework in the CS's Section 10 should enable such focussed monitoring to be undertaken. Accordingly, no change is needed to ensure the soundness of the strategy in this regard.
23. The Council's Strategic Housing Land Availability Assessment (SHLAA) (EB10) analysed the potential capacity of housing development sites in the district's main towns as at April 2009. During the hearings the SHLAA was updated to April 2010 (ED39) to reflect the uplift in the emerging WMRSS requirement from 3,400 to 4,000 in the Phase 2 Revisions Panel Report of September 2009 (EB02). The update showed that, despite a recent slowdown, a total of 919 dwellings had been completed in the four years 2006-10 at an annual average of 230 units. With additional housing commitments (ie as yet unimplemented planning permissions) totalling some 1,217, the current level of housing land supply is over six years, thus satisfying the initial expectation in PPS3.
24. Looking beyond the first five years, in accordance with best practice the SHLAA analysed potential housing development sites and concluded that some 54 sites had housing potential with a combined area of 68 hectares and an estimated nominal net capacity of 2,217 dwellings. This total excluded those many Category 4 sites which were deemed unsuitable for a variety of environmental and policy related reasons. In line with advice in PPS3 it also excluded windfalls which may come forward.
25. Doubts were raised by representors as to the deliverability of several significant brownfield sites in the district generally, and central Kidderminster in particular, due to both the availability of land currently still occupied for business purposes and the location of some of the sites in flood risk areas. Concerns were also raised for reasons of economic viability over certain of the sites where redevelopment costs were unknown in detail but likely to be high.
26. On the former point the Council's Local Development Scheme includes both a Kidderminster Central Area Action Plan DPD (KCAAP) and a Site Allocations and Policies DPD. On adoption of the Core Strategy these more detailed documents will be able to address the deliverability questions in greater detail, and if necessary assist in assembling land and relocating businesses still remaining in outworn

premises and less than ideal locations. I am satisfied that there is sufficiently robust information in the SHLAA and flexibility in the policies to conclude that there is a reasonable prospect of most, if not all, of the land becoming available during the plan period.

27. With regard to viability, various criticisms were made of the Council's consultant's study (EB17/18) suggesting that it had underestimated various cost elements and over-valued the resultant development capital values. However, the study was undertaken by a highly experienced firm of property specialists and the criticisms levelled were subject to detailed rebuttal. I have no firm counter-evidence to lead me to conclude that the valuation study was not sufficiently detailed and well founded for strategic planning purposes. Both the Council and its consultants recognise that it will be necessary to provide more detailed viability analysis to inform the KCAAP and Site Allocations and Policies DPD stages. Consequently I am satisfied that the SHLAA is based on evidence which is robust and sufficient to conclude that there is a reasonable prospect for delivery of the majority if not all of the sites placed in Category 3 as potentially viable development sites.
28. However, given the recent and continuing economic slowdown and squeeze on credit it does seem likely that the acceleration in housing delivery envisaged in the Council's trajectory to an annual level of 326 dwellings for the period 2011/12-2015/16 will be a challenging target which could conceivably be missed. The Council's monitoring of delivery performance and the prompt preparation and adoption of the two DPDs will be important in helping to keep delivery on track and in reviewing the plan if circumstances change markedly in the second five year phase.

#### Distribution of new housing

29. In my view the spatial strategy in policy DS01 and the related policies DS02 and DS03 for Kidderminster and the Market towns give a clear indication of the overall distribution of new housing and allow for flexibility in delivery as the Site Allocations and Policies and KCAAP DPD processes unfold. Policy DS04 also allows for modest levels of new affordable housing to meet identified need in smaller settlements and the rural areas. No changes are necessary to make these parts of the document sound.

#### Dwelling mix and type

30. Policy CP05 Delivering Mixed Communities makes clear that the plan's aim is to meet the identified needs of the whole community including a range of types, tenures and sizes to create mixed communities. It also aims to meet the needs of older and vulnerable people and those with mobility impairments in sustainable locations with access to local services.

31. The policy also provides indicative density standards to ensure the efficient use of land in the most sustainable locations. A caveat within the policy makes clear that the various indicators will be applied with flexibility where they would not respect the character and surroundings of the site. As a large part of the district is either within the Green Belt or in very attractive open countryside where greenfield development is to be minimised for strategic reasons in my view this is consistent with the national policy in PPS3 including the recent amendments by the coalition government.

Conclusions on housing provision and distribution

32. I conclude that the plan's housing proposals have properly addressed the amount, distribution and mix of housing development to meet identified needs and that, subject to the intended monitoring processes and any resultant fine tuning the proposed housing land supply is justified and appropriate. Moreover they are consistent with the spatial strategy, appropriate in light of the constraints affecting settlements, sufficiently flexible and accord generally with national guidance.
33. The Council has suggested minor amendments which respond to various representations and would help clarify the preceding sections of the plan and parts of the explanatory text to the housing policies within Policies DS05 and CP04-6. I endorse the following Council suggested changes in the interests of clarity and increased effectiveness: CC23-24, CC26-28.

**Issue 3 – Whether the provisions of affordable housing (Policy CP04) and Gypsy and Traveller Accommodation (Policy CP06) are well founded and based on sound evidence**

Affordable Housing

34. In discussing the level of affordable housing to be provided, respondents questioned the robustness of the Council's justification for a percentage target on the grounds that it failed to have regard to economic viability, contrary to the advice of paragraph 29 of PPS3.
35. The SHMA 2007 (EB31) and an update in April 2010 (ED60) analysed the need for affordable housing across the district and surrounding areas. They show that the net affordable housing need is around 175 dwellings per annum. This level of need is generally supported by Rural Housing Needs Surveys undertaken by a number of parishes. Given the overall quantum of housing to be provided (200 pa avg) there is limited scope to meet need on this scale and hence this becomes an exercise in the art of the possible.
36. In 2009 a Viability Assessment of 23 potential housing sites (EB17) and an updated addendum in March 2010 (EB18) indicated that while an initial target level of 40% would lead to some instances of negative development value (and hence non-viable schemes) the level of 30% in Policy CP04 would in most cases produce schemes

which were viable. Such assessments are known to be highly sensitive to cost and value variations and hence it is recognised that individual assessments are needed on a project-by-project basis. The policy wording allows for such site-by-site assessments and hence is flexible and in line with national guidance. A standard viability model will be developed to ensure consistency as part of the Site Allocations and Policies and KCAAP DPDs.

37. Given the level of overall need for affordable housing in the district in my view the site size thresholds of 10 units in Kidderminster and Stourport-on-Severn, and 6 units in Bewdley and the rural areas, are justified by the evidence. Overall I conclude that there is a sufficiently robust evidence base to support the policy aim of seeking 30% affordable housing from qualifying schemes.
38. The Council has suggested minor wording changes to reflect the up to date position in respect of the studies and the former WMRSS. I endorse changes CC46-CC51 in the interests of clarity and accuracy.

#### Gypsy and Traveller and Travelling Showpeople Accommodation

39. Policy CP06 aims to meet the identified needs of various travelling communities by safeguarding existing sites and providing a framework for the provision of additional accommodation sites within and around Kidderminster and Stourport-on-Severn. It responds to evidence in the 2008 Gypsy and Traveller Accommodation Assessment for the South Housing Market Area (EB33). After the close of the examination hearings the coalition government announced its intention to withdraw current national policy advice on Gypsies and Travellers and Travelling Showpeople in Circulars 01/2006 and 04/2007 but the Circulars remain extant at the time of this report. Bearing in mind the evidence of local need, and the objective of the plan to meet the needs of all the community, I consider that the CS's policy approach would remain sound even if little or no weight is now given to the Circular in the light of the recent government announcement.
40. At the examination it was requested that a criterion be added to the policy stating that new sites should not be located in the Green Belt. The Council considered that the plan should be read as a whole and in conjunction with PPG2, and that other locational policies would also apply. Since DPDs should not simply repeat national policy I agree with the Council's approach and therefore do not consider that such a change is necessary.
41. In respect of other criteria, the Council considered that they accorded with current national policy in Circular 01/2006. In particular, Criterion 1, site size, arose from consultation with Gypsy and Traveller families. The Council stated that Criterion 6 was included to ensure that sites in the Site Allocations and Policies DPD are considered as part of the overall housing need and that it is consistent with ensuring the amenity of Gypsy, Traveller and

Travelling Showpeople when residing on sites. Criterion 7 is included because of biodiversity and Green Infrastructure concerns and links to policies CP13 and CP14. I consider that the plan's approach is sound and endorse the Council's proposed change to Criterion 4 which clarifies the need for sites to be accessible by a variety of transport modes (CC52). The Council's suggested changes CC53 and CC54 address the revocation of the WMRSS and are also endorsed in the interests of clarity.

**Issue 4 – Whether the plan makes appropriate provision for economic development, having regard to the regeneration needs of the area including the amount and distribution of land for employment development and the focus for tourism development**

Employment Land

42. The plan's Spatial Strategy confirms that provision will be made for 44 hectares of land for new employment over the plan period. The Phasing and Implementation policy confirms that a rolling five year supply of deliverable employment sites (11 ha) will be maintained throughout the plan period. In line with the expectations in national policy in PPS4, the policy is underpinned by a broadly up-to-date evidence base. This includes the Council's Employment Land Review carried out in stages between 2007 and 2008 (EB19). The local economy does not exist in isolation and hence, although the WMRSS has been revoked, as a matter of historical fact the local economic strategy has also had regard to it and to the Regional Economic Strategy.
43. It is clear that recent decades have seen a decline in the area's historic base in manufacturing and especially carpet making. Many, though not all, of the former factories in Kidderminster and Stourport on-Severn have now gone, and, while new employment has been attracted, the area is still part way through a major structural adjustment with the attendant social, economic and environmental problems this entails. Thus there has been little challenge to, and considerable consensus around, the overall need to ensure economic regeneration and the beneficial recycling of former employment land in suitable locations. The underlying economic aim is to enable the development of a diverse economy able to respond flexibly to economic opportunities and offer increased job choices to the local workforce while helping to minimise out-commuting.
44. The employment land review included a sectoral analysis and modelled demand scenarios related to different population levels to establish the potential changes in various sectors in the district and the level of land likely to be required for new jobs. It is noteworthy that in terms of supply 49 hectares was identified in the pipeline as being potentially deliverable for B1, B2 and B8 uses between 2006 and 2026.

45. During the examination some reservations were expressed as to whether the 44 hectares identified as being needed for the balance of the plan period was overgenerous. Also, some questioned its viability and deliverability. I note that the Council's chosen land figure includes an allowance of 20% for flexibility. Having regard to current vacancy levels, the economic slowdown, viability issues for new development, and the scope for increased home working and reduced space demands resulting from the use of new technologies and the digital economy, I consider that 44 hectares might be at the upper level of the supply needed for formal allocation. However, the Council will be able to monitor this and maintain a five year supply and be ready to commit the balance of the necessary land as part of the KCAAP and Site Allocation and Policies DPD processes as and when economic prospects and specific demands become clearer. Accordingly, I conclude that the plan is sound and needs no change in this regard.
46. The intended distribution of employment land is generally consistent with the spatial strategy. Queries arose in respect of the ex British Sugar site in Kidderminster which forms part of the Stourport Road Employment Corridor. This major site has lain unused for several years although considerable demolition has taken place and some ground restoration works are ongoing. Its future as a potential mixed use commercial site was discussed at the examination hearings and is dealt with in detail under Issue 5.
47. As well as promoting new employment development Policy CP08 also seeks to protect existing land and premises where they do not compromise the activities of the employment area or conflict with other policy objectives. Such possibilities are to be assessed by application of defined criteria intended to safeguard the economy and local environment. This seems logical and consistent with the overall strategy.
48. The Council's minor change to Policy CP08 (CC61) would clarify the aim to provide a portfolio of sites for a range of different business and is endorsed in the interests of increased clarity and flexibility. Other minor text changes would improve clarity and remove unnecessary repetition and are endorsed on that basis (CC25, C28 and CC60-66).

#### Sustainable Tourism

49. The area has several regionally significant tourist attractions: the Severn Valley Railway, the West Midlands Safari Park, the historic canal and river towns of Stourport-on-Severn and Bewdley, and a very attractive rural hinterland. Tourism is already a significant employer and economic activity and hence Policy CP10 aims to build on these positive foundations.
50. Representors queried the logic of including Kidderminster as the primary area for new tourist accommodation and questioned whether

this approach was consistent with the DCLG Good Practice Guide. While it is true that the main tourist attractors are mostly in the rural areas and market towns, the regeneration needs and commercial leisure opportunities of Kidderminster are also apparent. The Council clarified that it was keen that tourism benefits did not pass the main town by. It confirmed that there is active interest in business and conference tourism and hotel development and noted that the town was in the most sustainable location.

51. I am satisfied that the Council does not intend to promote Kidderminster to the exclusion of other tourist destinations but that rather it sees the town as the hub of a network of complementary tourist, leisure and business activities. Given the need for regeneration and the proximity of the town to the Safari Park and its connection of the national rail network with the Severn Valley Railway I consider that this approach is sound and that no change is needed.

#### West Midlands Safari Park

52. Particular representations were made on behalf of the West Midlands Safari Park that its significance as a major regional tourist attraction and local employer, coupled with its need to secure investment to continually refresh its specialist 'offer' in the light of national competitor pressures, warranted a change in its planning policy status within the Green Belt.
53. National guidance in PPG2 makes clear that Green Belts are long-term policy instruments intended to check urban sprawl, prevent the merging of neighbouring towns, and safeguard the countryside from encroachment. The park lies within the long established West Midlands Green Belt and occupies part of the gap between Kidderminster and Bewdley, comprising attractive undulating and partly wooded countryside. In relation to minor developments the desire of the park operator to evolve the facility over time, without continually needing to demonstrate very special circumstances, is understandable. The park's ambition to develop a hotel facility to complement the recently and comprehensively restored conference and banqueting centre is also understandable.
54. However, in my view the possible definition of the park as a Major Developed Site in the Green Belt, under Annex C of PPG2, would be premature pending the preparation of a sustainable plan for the entire site. This could include a landscape master plan to ensure that the visual impact of the park, its necessary security fencing, and any future more significant leisure development was properly balanced and designed to minimise impacts on both the openness of the Green Belt and on the attractive rural setting of the park.
55. At the examination it was clear that the Council was willing to work with the park operator and the Severn Valley Railway to explore the possible creation of a Safari Park halt on the railway and thus to

create 'synergy' between the district's two largest tourist attractors. The Site Allocations and Policies DPD process would offer a positive opportunity to progress the ambitions of all parties within the strategic framework set by the Core Strategy while enabling necessary public consultation and sustainability appraisal on more detailed options to take place. Accordingly, I conclude that no change to the Core Strategy is warranted in this regard.

56. Two minor updating changes to the explanatory text to policy CP10 are endorsed in the interests of clarity (CC71 & 72).

#### Retail and Commercial development

57. In conjunction with the Spatial Strategy Policy CP09 provides direction and guidance on the role of Kidderminster town centre and the two market towns in providing retail and commercial services to meet existing and future needs. The policy is underpinned by a retail report commissioned in 2006 and updated in 2010 to analyse the retail and leisure market in the area (EB12 & 13). In line with national policy in PPS4 support is given to safeguarding and enhancing the vitality and viability of the district's existing retail centres.
58. In the light of the additions to Kidderminster's retail offer in recent years, and of the current economic downturn, the need for additional comparison goods floorspace in the first half of the plan period was re-examined and has been somewhat reduced in the early plan years. However, more space will still be needed towards the end of the plan period when the resident population has grown. The Council's suggested changes CC29 and CC67-70 would update the policy background and the comparison retail requirements to reflect the latest results from the updated evidence base and the revocation of the WMRSS. Hence I endorse these changes in the interests of clarity and greater certainty.
59. Consistent with national policy both retail and office development will be expected to follow a sequential approach; it will be directed to Kidderminster in the first instance with allocations made primarily through the KCAAP DPD.
60. In the market towns new retail and office development will be supported subject to compatibility with the built and natural environments. For new office development the focus will be on Kidderminster following a sequential approach including the Stourport Road Employment Corridor. There may need to be some flexibility in balancing the need for central area regeneration and enabling mixed use development at the former British Sugar site which remains undeveloped several years after its allocation for employment purposes in the local plan. This matter is discussed further under the following issue. I am satisfied however, that the thrust of the policy is sound in this regard and that no further changes are warranted.

**Issue 5 – Whether the plan's aims for the regeneration of Kidderminster, including the KCAAP and the Stourport Road Employment Corridor, are justified, consistent and likely to be effectively delivered? (Policy DS02)**

61. Policy DS02 aims to give greater detail on the application of the development strategy to the regeneration and further development of Kidderminster. As well as being the focus of the majority of new housing, retail, office and leisure development, the aim is to ensure physical and economic regeneration of those underused industrial and commercial areas where renewal is needed. The policy provides a framework for the preparation and implementation of the Kidderminster Central Area Action Plan (KCAAP) DPD which covers the central area, and a mixed residential and employment area adjoining to the north where there are underused buildings and land with scope for renewal. The policy also refers to the Site Allocations and Policies DPD which will deal with those parts of the town outside the KCAAP area, including the Stourport Road Employment Corridor.
62. Supportive evidence includes the ReWyre Initiative: Regeneration Prospectus (EB14), the Retail and Leisure Study (EB12/13) and a market appraisal (ED51). The SFRA and Water Cycle Strategy are also important documents to help inform the renewal of those parts of the town close to the River Stour where flood risk needs to be managed. The evidence base is robust in my view. However, I endorse the Council's suggested change (CC21) which clarifies the role of the Prospectus in highlighting the town's challenges and opportunities to help attract support and investment.
63. The policy aims include improving the evening and night-time economy and cultural offer of the town, and capitalising on its industrial heritage. To that end I endorse the Council's suggested changes (CC16, 19 and 20) along with other changes intended to update the background context (CC17 and 18). In view of the up-to-date evidence base, and support from a range of relevant stakeholders, I consider that these parts of the policy are justified, consistent, deliverable and sound.

Stourport Road Employment Corridor

64. The justifying text to policy DS02 refers to the Stourport Road Employment Corridor in general and the former British Sugar site in particular. When read alongside policy CP08 it is clearly the plan's aim to make full use of the British Sugar site for primarily business purposes through allocation via the Site Allocations and Policies DPD.
65. However, the 27 hectare site has been vacant and derelict for more than 8 years and there are considerable land contamination and reclamation issues remaining from its former use. Although allocated for employment in the existing Local Plan, and marketed by the current owners since 2006, no firm proposals have progressed beyond the initial inquiry stage. The landowner has argued that

employment-only development (as preferred by the Council) would not be financially viable. Supportive evidence was submitted by the representor showing that the demolition, remediation and infrastructure costs, along with the need to contribute its share to the planned Hoobrook Link Road, would outweigh the likely investment returns. The attractions of the site to footloose industry and/or speculative commercial development on a major scale are limited by the site's distance from the motorway network. Its comparative disadvantage in this regard is reflected in low capital values and rents in the nearby Stourport Road Employment Corridor.

66. The landowner's view was that the land should be identified as a Strategic Development Site to include a significant element of housing (at least 300 dwellings). This would enable the development of the balance of the land for commercial purposes, and the provision of the first part of the proposed link road between the A451 Stourport Road and Worcester Road.
67. The Council's April 2010 update of the SHLAA (ED39 Appendix 1) appears to have accepted that, at least in principle, parts of the site may be suitable for mixed use development, including an element of residential, subject to integration with neighbouring industry. Given the lack of a currently identified source of public funding for the balance (or indeed any) of the Hoobrook link road (including bridges over the River Stour and the Staffs and Worcs Canal close to electricity pylons), I considered that there was merit in exploring this possibility.
68. Accordingly, at my request two options were advertised by the Council as possible significant changes to this part of the plan. Having regard to the evidence of all parties, and the twenty representations received, I consider that a change is required and would not undermine the housing and employment land supply policies elsewhere in the Core Strategy which, for differing reasons explained previously, both require a degree of flexibility.
69. In advance of full traffic and environmental impact assessments and a fully detailed Sustainability Appraisal I have concluded that a Strategic Site allocation, as sought by the landowner (Option B), would be premature. However, I support the need for a clear indication of the acceptability, in principle, of some reasonably significant element of residential and mixed commercial development for the British Sugar site to make the plan sound with regard to the deliverability of this major element (Option A). In my view the precise mix and proportions of land use, and the associated master-planning and structural landscaping, should more appropriately be given detailed consideration as part of the Site Allocations and Policies DPD process having regard both to the strategic aims of the Core Strategy and the landowner's suggested aims in Option B.
70. **Consequently to make the plan sound I recommend that the Council adopt Inspector Change IC1 as set out in Appendix B.**

Land at Wilden Lane

71. Other land to the south east of the main former British Sugar site but which formed part of the complex's several settling ponds, is owned by Associated British Foods. The site is close to the built-up area and the highway network. The ponds were filled in some years ago in the interests of public safety and have now reverted to scrubland. The landowners seek to realise the land's potential for residential development by securing its release from the Green Belt.
72. In support they point to perceived limitations in the Council's SHLAA and consequential risks to new housing supply and delivery, and the localised lack of green infrastructure and public open space which residential development could help to secure.
73. However, PPG2 makes clear that Green Belts are long term policy instruments and that once fixed their boundaries should generally remain in place unless there are exceptional circumstances. In the Wyre Forest area the extant Local Plan has identified Areas of Development Restraint (ADR) to allow for the possibility of additional development if sufficient development land is not realisable within the existing built-up area. Given the potential supply of previously developed land, and the potential availability of the safeguarded land within the ADRs, there has been no demonstration of exceptional circumstances to warrant a revision of the Green Belt at this time. Consequently I conclude that no further change to the Core Strategy is required.
74. Overall subject to the change above I conclude that the strategy for Kidderminster is sound. In response to representors the Council suggested various minor wording changes CC16-23 which I endorse in the interests of clarity and effectiveness.

**Issue 6 – Whether the plan's aims for the development of Stourport-on-Severn and Bewdley, are justified, consistent and likely to be effectively delivered? (Policy DS03)**

75. Policies DS01 and DS03 make provision for housing, employment and retail development. The plan's aims for new development differ between the two towns based on their environmental capacity. Stourport-on-Severn has considerable brownfield land and hence is able to accommodate new housing and jobs on a greater scale than Bewdley. The latter is limited by its terrain, access issues and historic core and river crossing, as well as by flooding issues.
76. There is general support for the policy aims. However, at Bewdley Road, Stourport-on-Severn the landowner queried whether a former industrial site now demolished was suitable for employment or should be recognised as suitable and preferable for residential development.
77. Having looked at the evidence base and the site itself I conclude that there is no need to identify this site for residential purposes or to

introduce the proposed policy submitted by Harris Lamb on 27 July 2010 (ED96) in advance of the Site Allocations and Policies DPD. Existing policies within the Core Strategy would not appear to preclude residential development in this location subject to consideration of the criteria in policy DS01 and this position was accepted by the Council in its Hearing Statement. I conclude that no change is necessary.

78. I conclude that no change is necessary to policy DS04.

**Issue 7 – Whether policy CP07 will deliver community well being and enable developer contributions in line with national policy?**

79. The policy aims to ensure the timely provision of necessary community facilities and infrastructure, and to provide an indicative framework for the provision of developer contributions in line with national guidance in PPS1, PPG13 and PPG17. An up-to-date supportive evidence base includes the full range of community provision including community facilities, open space, sport and recreation, green infrastructure, and the Worcestershire Biodiversity Action Plan.
80. With regard to developer contributions, reference is made within the justifying text to the continued use of the adopted Planning Obligations SPD which follows the national principles set out in Circular 05/2005. I endorse the Council's suggested change CC59 to ensure that the text makes a sensible cross-reference to the Community Infrastructure Levy (CIL) should the coalition government decide to proceed with that emerging approach.
81. I conclude that the plan is sound in this regard. The Council suggested other minor changes, including clarifying that Health and Community Safety includes the Emergency Services. I endorse suggested changes CC55-CC58 in the interests of clarity.

**Issue 8 – Whether the plan provides adequately for protecting the natural environment and other environmental assets and securing appropriate Green Infrastructure?**

82. The strategy contains a comprehensive suite of environmental protection policies which has generally won the support of all stakeholders. There was discussion of the details of various elements at the examination.
83. In my view the policies are all generally consistent with national guidance and the overall spatial and development strategy and no significant changes are necessary to make them sound.
84. However, in order to achieve maximum consensus with local stakeholders, including regulatory bodies, the Council has suggested various minor wording changes which I endorse in the interests of clarity and effectiveness as follows:

- Policy CP12\* - Quality Design & Local Distinctiveness – I endorse Council changes CC73-78;
- Policy CP13\* - Landscape Character – I endorse Council changes CC79-83;
- Policy CP14\* - Providing a Green Infrastructure – I endorse Council changes CC84-86;
- Policy CP15\* - Providing Opportunities for Biodiversity and Geodiversity – I endorse Council changes CC87-90;
- Policy CP16\* - Regenerating the Rivers and Canals – I endorse Council changes CC91-2.

\* The above policy numbers refer to the original numbers for these policies. They will need to be edited as a result of the merging of original policy CP11 with CP3. The index will also need to be amended.

### **Issue 9 – Climate Change, Sustainable Construction and Water Management – are Policies CP01 and CP02 sound?**

85. National policy in the Climate Change Supplement to PPS1 (CCS) stresses the need for planning to contribute positively to securing solutions to the impacts of climate change and to mitigating its harmful effects. This is a cross-cutting theme running through the notion of sustainable development which informs the Core Strategy as a whole. Policies CP01 and CP02 address the particular topics of Sustainable Development (ie building) Standards and Water Management.
86. In line with the CCS and PPS22 Policy CP01 aims to promote energy efficiency in all buildings, and renewable energy provision generally, including through the generation of a proportion of on-site renewable energy in residential and commercial developments over reasonable size thresholds. These requirements run alongside the Building Regulations which are progressively requiring buildings to be more efficient in energy usage. This is crucial if the country is to meet its international CO<sub>2</sub> emissions targets.
87. I support the thrust of these policies, but along with developer representations recognise that the achievement of the highest levels of the Code for Sustainable Homes (levels 5 and 6) involve high construction costs which may not yet be viable in individual cases. I endorse the Council's suggested changes CC33-34 which will go some way to allowing flexibility in this regard. However, the Council may also need to accept that nearby off-site provision may be an equally acceptable solution to the 10% on-site target in particular cases (Eg for ground heat recovery, bio-mass, CHP, wind and river turbine projects). The intended use of a locally tailored version of the West Midlands Sustainability Checklist will also help achieve technically and visually acceptable solutions while ensuring cross-boundary consistency of approach.

88. In line with national policy free-standing renewable energy developments are also supported. In this regard I endorse the Council's suggested change CC32 which avoids repetition of the acknowledged need for landscape assessment as this would put a potentially overly restrictive additional 'spin' on local policy which would be inconsistent with PPS22.
89. The policy and justifying text rightly draws attention to the need to achieve improved waste minimisation and re-cycling in line with European Directives. As such I consider that it is in line with national policy in PPS10.
90. Policy CP02 Water Management addresses the various local challenges including the need: to manage flood risk especially from surface and fluvial sources; to ensure adequate water supplies in times of increasing rainfall variability; and to secure acceptable water quality. While the thrust of the policy was supported by the Environment Agency (EA) as the relevant statutory authority, the agency sought various wording changes to ensure that the policy was fully in line with national policy in PPS25 and emerging best practice. To ensure such consistency I endorse the changes CC35-41 jointly suggested by the EA and the Council. No other changes are necessary to make the plan sound in this regard.

**Issue 10 – Transport and Accessibility - is Policy CP03 sound?**

91. The Council proposed to merge policies CP03 and CP11 in CC42-45 at the request of the local highway authority Worcestershire County Council. This approach avoids unnecessary repetition within the plan and is consistent with the emerging Local Transport Plan (LTP). Accordingly, I endorse this change.
92. The evidence base for transport includes the existing Local Transport Plan and the forthcoming LTP3, as well as the Baker Associates Report on Infrastructure Requirements for Worcestershire, including the April 2009 Addendum and the Hoobrook Road Pre-Feasibility Study.

Kidderminster, Hoobrook Link Road

93. This road is at a relatively early stage in development, in that it will be a major scheme submitted to government through the LTP3 process, intended to be delivered within the first five years of that plan.
94. The County Council confirmed that the scheme has positive benefits for Kidderminster by reducing congestion and pollution and that any work commenced on it by the developers of the British Sugar site may make government funding more likely. As well as its vital role in helping to deliver beneficial development of the British Sugar site I consider that the proposed Link Road would have wider benefits in the removal of commercial vehicles from the town centre and the

Ring Road with consequential traffic and environmental benefits for other road users and local residents.

#### Stourport Relief Road

95. The Stourport Relief Road is a long standing aspiration of both the County Council and the District Council to alleviate congestion in the town centre and the wider A451 corridor and is safeguarded in the adopted Local Plan. The County Council confirmed that the scheme has a very strong business case, in terms of the evidence that would be required by the Department for Transport, at 5:1 benefit. The entire scheme is substantial and will take time to deliver, especially given current public funding constraints. However, two sections of the road have been completed, enabled by residential development, and a permitted supermarket scheme will shortly deliver a further section and an access bridge over the River Stour.
96. To the south the proposed line of the relief road crosses land occupied by Stourport Cricket and Rugby Clubs on the south side flood plain of the River Severn. The freehold is owned by the District Council. The proposed relief road hinders the ability of these two successful and growing sports clubs to invest in their facilities and in particular to secure public funding.
97. I have considerable sympathy for the sports clubs and recognise their positive contribution to the local community, especially as the available evidence points to the steady erosion of open spaces and organised sports facilities over recent decades. In my view this puts a premium on those well run facilities which remain and which operate largely through voluntary endeavour.
98. However, it seems to me that there is a reasonable prospect of at least some further stretches of the relief road being delivered within the plan period. As such the scheme as a whole ultimately offers significant community benefits in terms of reducing congestion, noise pollution and accidents within the crowded centre of the town. Despite the lack of firm funding for completion of the road, and the present squeeze on public spending, I consider that the community need for the road in the long term is sufficient to retain the safeguarded line notwithstanding that the new river crossing in particular may take several years to be achieved.
99. Nevertheless, in view of the club's positive contribution to the community, and the nationally supportive policy for sport and recreation in PPG17, it would be desirable for the District and County Councils to discuss with the clubs whether there are options for reconfiguring the pitches and/or the detailed line of the road to enable a longer future to be demonstrated to sports funding bodies. As this goes beyond the direct remit of the Core Strategy I make no formal recommendation but I would anticipate that the two Councils would wish to respond to well articulated local needs in a positive manner.

100. I conclude that the plan is sound in respect of these two proposals.

Bus travel

101. While bus use has decreased in recent years, as part of a package of measures the County Council is looking to introduce Real Time Public Information and integrated ticketing systems, as well as physical measures to provide priority for buses and cyclists in constrained locations as well as other measures to release capacity for walking, cycling and public transport in order to minimise traffic congestion and improve air quality. These measures are consistent with national and local plans and are supported.

Rail travel

102. Kidderminster is the second busiest railway station in the county and has good links to Birmingham, Worcester and Droitwich as well as peak services to London. There has been recent investment in station buildings and improvements to rail services. LTP3 will contain a Wyre Forest package, part of which will include proposals to enhance the Kidderminster Station interchange, to improve capacity, forecourt, station buildings and bus stop facilities as well as to improve access to the station from Comberton Hill. The possibility of linking the main line railway with the Severn Valley Railway remains, although the link is not currently signalled. There is also scope to explore the provision of passenger halts on the Severn Valley line at the former British Sugar site and the West Midlands Safari Park.

103. No further changes are needed to ensure the soundness of this part of the plan.

**Issue 11 - Infrastructure – can necessary infrastructure be delivered at the right time?**

104. The plan's implications for infrastructure provision have been the subject of various Infrastructure studies (including ED20a and 20b). More detail is planned to inform the Site Allocations and Policies and KCAAP DPD processes. In the present financial climate there is less certainty about the precise sources, levels and timing of funding likely to be available to help implement the growth plans in the strategy than would ideally be preferred.

105. However, the Monitoring and Implementation framework shows that the Council is aware of the major needs and is in close consultation with necessary funding bodies and partner delivery agencies. On the evidence I am satisfied that the strategy includes a reasoned and balanced approach to the provisions of necessary infrastructure and that it is generally consistent with the advice in PPS12 and is sound in this regard.

106. In the interests of clarity and effective delivery I endorse the Council's suggested changes CC30-31, and CC97-98.

**Issue 12 – Monitoring and Implementation Framework, Jargon Guide and former Structure Plan policies**

107. The Monitoring and Implementation Framework seeks to set out a comprehensive approach to ensuring that the Council is delivery focussed and able to review and if necessary amend its approach if circumstances change. The process of examination teased out various minor omissions and errors none of which were fatal to the soundness of the plan in my view.
108. However, in the interests of clarity, certainty and maximum effective delivery I endorse the following changes suggested by the Council and/or its various delivery partners and stakeholders: CC93-96, CC99 - CC111.

**Changes**

109. Appendices A and B include the various changes arising from the submission document many of which were discussed at the examination hearings:
- A Changes the Council considered necessary to make the Plan sound;
  - B One change I conclude is necessary to make the Plan sound.
110. For each change the reason has been given in the body of the report. Reasons for those Council changes which I endorse are generally clear from their content, but they are also explained more fully in the Council's own documentation (ED114).

**Overall Conclusion and Recommendation**

111. I conclude that with the changes proposed by the Council, set out in Appendix A, and the change that I require, set out in Appendix B, the Wyre Forest Core Strategy DPD satisfies the requirements of s20(5) of the 2004 Act and meets the criteria for soundness in PPS12. Therefore I recommend that the plan be changed accordingly.

*Philip A Goodman*

Inspector

## **APPENDIX A**

### **RECOMMENDED COUNCIL CHANGES**

These changes were, proposed or supported by the Council, in some case prompted by Representatives in Statements of Common Ground and also through the public hearings. In Column 1 'CC' refers to 'Council Change' and the numbers in brackets to the Council's Final Schedule of Proposed Changes (ED106). They are listed in plan order. Generally I endorse them in the interests of clarity and effectiveness. Where they are key to soundness they are shown in bold type.

Report ref (no in brackets is Council's schedules ref)	Policy or section	Change
CC1 (HA1)	Front Cover	Put period the plan covers on the front cover (2006-2026) Put Adoption date on front cover
CC2 (HA2)	Introduction Para 1.8	Amend ref. to Appendix B: Evidence Base to Appendix D: Evidence Base
CC3 (HA3)	Introduction Para 1.11	Delete existing para and replace with: "The Core Strategy was prepared in accordance with the emerging West Midlands Regional Spatial Strategy (WMRSS). The emerging WMRSS provided the regional context in relation to future residential, employment, office and retail development. The Secretary of State revoked Regional Strategies on 6th July 2010. The Council has demonstrated that the Core Strategy is based on robust local evidence and support, however, a number of consequential amendments have been made to the Core Strategy wording to reflect the revocation of the RSS."
CC4 (MA1)	Introduction p.4	Include extra bullet point at Paragraph 1.13: "• Worcestershire Local Area Agreement – through helping to deliver the Areas of Highest Needs Projects

		within the District.”
CC5 (SCG6 PCS144)	Para 3.3	Amendment to end of paragraph 3.3 of the Vision to read: “the risk of flooding”
CC6 (MA2 & SCG8/PCS84)	Para 3.10	Amend paragraph 3.10 to read: “conserve and enhance the District’s varied landscape character, including the reuse and repair of historic farm buildings”
CC7 (MA3))	p.11	The table under the section entitled Core Policies to be amended to include ‘Communities that are safe and feel safe’ in the third column for Core Policy 11 Quality Design / Local Distinctiveness
CC8 (HA4)	p.13 para 5.4 Policy DS01 Development Locations	Add to end of paragraph: “The levels of development required within the District, and the principle of preventing out-migration from the Major Urban Areas were set out in the former emerging WMRSS. Following the revocation of the RSS the Council has demonstrated that there was sufficient local evidence and support to justify retaining these figures.”
CC9 (HA5)	p.13 footnote	Amend to read: “former WMRSS”
CC10 (HA6)	p.14	Amend ‘Arley’ to: “Upper Arley”
CC11 (HA7)	p.14 para 5.5	Amend to read “former West Midlands Regional Spatial Strategy (WMRSS)” Amend remainder of the paragraph to reflect the change in tense
CC12 (HA8)	p.15 para 5.6	Amend to read: “former WMRSS” Amend remainder of the paragraph to reflect the change in tense
CC13 (MA4)	p.15 Table 5.1	Re-title Table 5.1 from “Amount of Development on brownfield Sites” to:

		"Indicative location of future residential development"
CC14 (HA9)	p.15 para 5.11	Amend to read: "former WMRSS"
<b>CC15 (HA10)</b>	<b>p.15 DS01 Development Locations</b>	<p><b>Insert new paras after para 5.11 to read as follows:</b></p> <p><b>"Greenbelt</b></p> <p><b>5.12 Within the District, all countryside to the east and as far west as the River Severn is included within the West Midlands Green Belt. Its extent is shown on the accompanying Key Diagram. The towns of Kidderminster, Stourport-on-Severn, Bewdley and the larger villages of Blakedown, Cookley and Fairfield are excluded from the Green Belt.</b></p> <p><b>5.13 The level of development to be accommodated within the District can be met primarily from brownfield sites and there are no existing exceptional circumstances that warrant a review of the Green Belt boundary. The District has a number of identified Areas of Development Restraint (ADRs) as shown on the Proposals Map and these will continue to be safeguarded from development. New development proposals will therefore be resisted within the Green Belt in accordance with the provisions set out in national planning policy guidance – PPG2 'Green Belts'. Only proposals which can demonstrate very special circumstances will be permitted."</b></p> <p><b>Re-number subsequent paras in section 5.</b></p>
CC16 (MA5)	p.16 Policy DS02 K'Minster Local Regeneration Area	Amend third paragraph to read "This includes the provision of supporting facilities such as hotels, conferencing facilities and developments that improve the evening/night time economy and cultural offer of the town."

CC17 (HA11)	p.17 Policy DS02	Amend to read: "As one of only 25 'strategic centres' in the West Midlands Region and a Local Regeneration Area the town has a unique role within the District."
CC18 (HA12)	p.17 para 5.19	Amend to read: "The town has a number of brownfield sites in its central area which have great redevelopment potential as demonstrated through the Kidderminster Regeneration Prospectus. The development of residential, office and comparison retail development is to be in line with the requirements as set out in Policy DS01."
CC19 (SCG2 & PCS45)	p.17 para 5.20	<p>Insert new para into the reasoned justification to Policy DS02 (after para 5.20):</p> <p>"The development of a diverse evening/night time economy centred on Kidderminster is seen as an important element in driving the improvement of this strategic centre and the wider District. Careful consideration will be required to determine the number, type and scale of activities and uses to ensure that a rich, inclusive and safe environment is created. The Council and its partners consider that this process should be taken forward in the Kidderminster Central Area Action Plan and Site Allocations and Policies Development Plan Documents."</p> <p>Renumber subsequent paras in Section 5.</p>
CC20 (SCG8 & PCS87)	p.18 para 5.24	<p>Amend reasoned justification to DS02: Kidderminster Regeneration Area, by adding to the objectives of the KCAAP at the end of 4th bullet point after 'spaces for people':</p> <p>"that capitalise on the town's unique industrial heritage."</p> <p>And by inserting into 5th bullet point</p>

		after 'environmental': "/>heritage."
CC21 (HA13)	p.18 para 5.28	Reword to read: "The District Council has produced a Regeneration Prospectus (footnote: Rewyre Initiative: A Prospectus for Regenerating Kidderminster (September 2009)) for Kidderminster as part of the ReWyre Initiative. The Prospectus aims to highlight the town's challenges and opportunities and provides a series of concepts and a focus for delivery intended to attract support and investment."
CC22 (HA14)	p.21 para 5.32	Amend to read: "the former WMRSS stated..."
CC23 (HA15)	p.23 Policy DS04	Amend first sub para to read: "New residential development in the District's villages, rural settlements, and other rural hamlets will be to meet local housing needs only, as established through parish surveys."
CC24 (HA16)	p.27 Policy DS05	Amend first para to read: "To deliver 4,000 net additional dwellings for the period..."
CC25 (HA17)	p.27 Policy DS05	Amend Employment sub para to read: "To deliver 44 hectares of employment land..."
CC26 (HA18)	p.27 para 5.60	Amend to read: "former WMRSS"
CC27 (HA19)	Para 5.61	Amend to read: "The housing trajectory contained within the Monitoring and Implementation Framework, depicts the managed delivery targets necessary to achieve the overall target for residential development per annum."
CC28 (HA20)	Para 5.64	Amend to read: "former WMRSS"

CC29 (HA21)	p.28 para 5.66	Amend to read: "It is not considered appropriate to phase development that will meet the District's retail and commercial requirements as set out in policy DS01 at this stage."
CC30 (MA6)	p.29 para 5.67	Add the following text to paragraph 5.67 (Infrastructure): "Costs and infrastructure requirements have been estimated from discussions with key stakeholders and delivery bodies, such as Worcestershire County Council, the Primary Care Trust, Environment Agency, utility companies and emergency services. Further work on high level costings and an infrastructure implementation plan will be carried out to inform the Site Allocations and Policies and Kidderminster Central Area Action Plan DPDs. This will ensure that the information is up-to-date."
CC31 (HA22)	p.29 para 5.67	Insert new paragraph after 5.67 under infrastructure as follows: "Environmental) Infrastructure In areas where there is an identified infrastructure (including discharge consent) constraint, as indicated within the Water Cycle Strategy Constraints Matrix (Tables 22A - 22D), development sites must demonstrate that the necessary infrastructure is in place to serve the development. Where necessary, development should facilitate the timely provision of additional infrastructure needs <i>[as shown within the Infrastructure Implementation Plan, to be undertaken].</i> "
CC32 (MA7 & SGC4/PCS288 & HA23 & HA24)	p.32 Policy CP01 Delivering Sustainable Development Standards	Amend policy to read: " <b>Energy Efficiency and Renewable Energy</b> All new development proposals within the District must demonstrate how they reduce their impact on the environment. The design, layout, siting,

		<p>orientation, construction method and materials used should seek to maximise energy conservation and efficiency.</p> <p>A minimum of 10% of the energy requirements of major<sup>(*footnote)</sup> new developments should be met on-site from low or zero-carbon energy sources. The technologies installed should be retained and maintained during the full lifetime of the building. Consideration should be given to the use of combined heat and power systems on larger sites, particularly on industrial sites or sites of new community infrastructure.</p> <p>Free-standing renewable energy developments will be supported subject to them meeting the requirements of all other policies within the LDF.</p> <p><b>Addressing Climate Change</b> The implementation of the Code for Sustainable Homes will be supported in line with the national timescale. Developers will be encouraged to meet a higher code level than is mandatory where this is economically viable. Non-residential buildings will be encouraged to achieve a BREEAM rating of 'very good' or higher.</p> <p>New residential development should include water efficiency measures to a minimum level of 105 litres per person per day (equivalent to Code for Sustainable Homes Level 3/4 for Water Consumption). More stringent targets for water efficiency standards in new developments will be investigated through the Site Allocations and Policies DPD guided by the Water Cycle Strategy.</p> <p>All new developments must make provision for waste recycling and as a minimum, developments will be required to provide sufficient space to store materials for recycling.</p>
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		<p>All new developments will be required to demonstrate that they have considered the impact of climate change upon them and that they are suitable for the predicted changes in climate.</p> <p>Design and Access statements for all major developments* must include a Sustainability Statement which has regard to the contents of the West Midlands Sustainability Checklist.</p> <p><b>Environmental Quality</b> All new development must demonstrate that land contamination issues have been fully addressed. Proposals must undertake appropriate remediation measures and verification works where contamination issues are identified.</p> <p>* (footnote: see definition of Major Developments in the Jargon Guide)</p>
CC33 (MA8)	p.33 Footnote 7	Amend footnote to read: "Worcestershire County Council Renewable Energy Study (Prepared by IT Power consultants, November 2008)"
CC34 (HA25)	p.33 para 6.11	Amend Paragraph 6.11 to read: "The West Midlands Sustainability Checklist provides an interactive toolkit for developers to assess the extent to which a development site proposal will deliver on different aspects of sustainability. Targets for achieving particular levels will be set for individual sites where appropriate. These will be informed through the production of a locally tailored version of the checklist for the Wyre Forest District."
CC35 (HA26)	p.33 after para 6.11	<p>Add new section and amend paragraph numbering accordingly.</p> <p><b>Water Efficiency</b></p> <p>A Water Cycle Strategy (Footnote:</p>

		<p><i>Wyre Forest District Water Cycle Strategy – Royal Haskoning, 2009</i>) of the District has been undertaken in order to understand the pressures and opportunities for all aspects of water within the Wyre Forest District. Water supply within the District is a finite resource with a significant amount of the water for public consumption coming from groundwater abstraction. Therefore, sustainable abstraction rates are essential to avoid negative impacts on the landscape and the District's wetlands.</p> <p>Part of the District falls into an area which is currently over-abstracted, and most of the remaining area of the District falls into the 'no water available' category. The Environment Agency is working with water companies and other abstractors to reduce abstraction to sustainable levels and therefore developments need to be mindful of this.</p> <p>Water management and conservation issues will become increasingly important throughout the plan period and it is therefore important that all future development proposals also accord with the provisions set out under CP02: Water Management.”</p>
CC36 (HA27)	p.34 after para 6.13	<p>Insert new section and re-number paragraphs as appropriate:  <b>“Development on Contaminated Land</b> 6.16 The Environmental Protection Act 1990 and PPS23 require the District Council to identify contaminated land and ensure that it is appropriately managed. There are currently no sites designated as contaminated land under Part 11A of the Environmental Protection Act 1990 in the Wyre Forest District. However, the development strategy focuses much of the District’s development on brownfield land and a number of these sites have known or potential contamination issues arising from</p>

		previous or current uses.”
CC37 (HA28)	p.35 Policy CP02 Water Management	<p>Amend policy wording as follows:          “The Strategic Flood Risk Assessment (SFRA) will be used to inform the location of future development within the District. In considering proposals for development the District Council will weigh up all of the relevant policy issues including PPS25 and PPS4 when giving full consideration to the sequential test and implementing the “Exception Test” where necessary. This approach will inform the regeneration of the District’s main towns, guiding site allocations for specific uses within the Site Allocations and Policies and Kidderminster Central Area Action Plan Development Plan Documents.</p> <p>New development will be required to incorporate appropriate Sustainable Drainage Measures (SUDs). This should be informed by the Water Cycle Strategy to ensure compatibility with specific catchment and ground characteristics, and will require the early consideration of a wide range of issues relating to the management, long term adoption and maintenance of SUDs.</p> <p>For developments in areas with known surface water flooding issues (footnote: as identified by the SFRA, the Environment Agency or the Council’s emergency planning team) appropriate mitigation and construction methods will be required.</p> <p>Applications which relate specifically to reducing the risk of flooding (e.g. defence/alleviation work, retro-fitting of existing development) will be supported so long as they do not conflict with other objectives within the Local Development Framework.</p> <p>New development should seek to provide betterment in flood storage and to remove obstructions to flood flow</p>

		<p>routes where appropriate.</p> <p>New developments should:</p> <ul style="list-style-type: none"> <li>i. Conserve and enhance the ecological flood storage value of the water environment, including watercourse corridors;</li> <li>ii. Open up any culverted watercourse where practicable (proposals involving the creation of new culverts will not be permitted);</li> <li>iii. Improve water efficiency through incorporating appropriate water conservation techniques including rainwater harvesting and greywater recycling;</li> <li>iv. Connect to the main sewer network wherever possible.”</li> </ul>
CC38 (HA29)	p.36 para 6.18	Delete para
CC39 (HA30)	p.37 para 6.22	Delete final sentence
CC40 (MA11)	p.38 para 6.25	Add the following text to the end of the last sentence: “, playing an important role as part of a wider green infrastructure network. Grasslands and long established habitats should be retained and appropriately managed to enhance flood amelioration benefits.”
CC41 (HA31)	p.38 paras 6.26-29	<p>Amend subtitle and text to read as follows: “<b>Water Use and Quality</b> Although flood risk is perhaps one of the most important issues for consideration when looking at future development, it is vital that water issues are considered holistically, taking account of water resources, water supply networks and infrastructure, groundwater, sewer networks and waste water treatment.</p> <p>Through the LDF it is important that water management techniques are incorporated into new developments. Water recycling is a key component of integrated water cycle management. The implementation of water recycling can help to reduce inputs of nutrients and other contaminants to surface</p>

		<p>waters, conserve drinking water and provide economic and social benefits. Developments should therefore incorporate appropriate measures for greywater recycling and rainwater harvesting, in order to maximise the opportunity for on-site water efficiency savings, as identified through the Code for Sustainable Homes.</p> <p>With regard to sewage disposal, development proposals should ensure that the most environmentally effective means of disposal is used. Wherever possible, sewage and trade effluents should be disposed of via a recognised water reclamation facility. Where it is not feasible to connect to mains sewerage, any proposals should include a suitable package sewage treatment plant. If such a solution is not appropriate, then any proposals incorporating septic tanks must demonstrate that there will be no adverse impacts."</p>
<p>CC42 (MA14)</p>	<p>p.40 Policy CP03 Promoting Transport Choice and Improving Accessibility</p>	<p>Add in the following text to the last sentence under Enhancing Accessibility: ", maximising accessibility by sustainable transport modes, minimising traffic generation and mitigating the effects of additional traffic through a package of multi modal measures."</p> <p>Combine CP11: Strategic Transport Infrastructure with CPO3. Add the following wording to the Delivering Transport Infrastructure Sub Section Paragraph 1 under Policy CP03: "Future proposals for employment development, particularly along the Stourport Road Employment Corridor, should have regard to the possibility of utilising the existing rail infrastructure for the sustainable movement of freight and to provide sustainable transport links."</p> <p>Add the following wording to the Strategic Transport Infrastructure Sub</p>

		<p>Section after paragraph 2: “The following strategic transport infrastructure schemes will be sought to support regeneration during the plan period:</p> <ul style="list-style-type: none"> <li>- Provision of a new Kidderminster Railway Station building and improved access for all modes of transport to the station facilities.</li> <li>- Connection of the Severn Valley Railway Line to the national rail network at Kidderminster Station to facilitate improved accessibility to the tourism attractions of the West Midlands Safari Park, Bewdley and the Wyre Forest.</li> <li>- Improvements to facilitate the multi-modal use of Kidderminster Ring Road and to enhance accessibility to the town centre and in particular pedestrian access.</li> <li>- Provision of a new A451/A449 Hoobrook Link Road to facilitate the Stourport Road Employment Corridor.</li> <li>- Provision of a Stourport Relief Road as a longer term scheme for delivery later on in the plan period during 2021-2026.</li> </ul> <p>Contributions towards these strategic transport infrastructure schemes will be sought from major development proposals throughout the plan period. Future development proposals that will include part of an identified strategic transport route or transport infrastructure, must be designed to accommodate this provision and reserve the land required for the scheme. Proposals which are likely to prejudice the future development of strategic transport infrastructure will not be permitted.</p>
<p>CC43 (MA15)</p>	<p>p.40 para 6.30</p>	<p>Delete the last sentence of para and add following text from Introduction to CP11: “The strategy for the future focus of employment land places emphasis on Kidderminster and in particular the Stourport Road Employment Corridor (SREC), where</p>

		the former British Sugar Site has been identified as a delivery priority. The regeneration of key employment and town centre sites will require the delivery of improved infrastructure and in particular transport links.”
CC44 (MA16)	p.41 para 6.34	Add in the following text at the end of paragraph 6.34: “Worcestershire County Council has also developed Transport Assessment Guidelines, which major development proposals should take full account of.” (Also include footnote highlighting webpage reference for the Transport Assessment Guidelines.)
CC45 (MA17)	p.41 para 6.36	Amend Paragraph 6.36 to read as follows: “The provision of strategic infrastructure including new roads needs to be considered as part of an overall integrated sustainable transport network. Relative distance from strategic regional transport routes and an ageing infrastructure are particular challenges for the sustainable economic regeneration of this area. There is heavy congestion along the A451 Stourport Road throughout the day, which also has a negative impact on communities within the deprived ward of Oldington and Foley Park. Future investment in transport infrastructure and services must be focussed primarily on delivering the levels of accessibility and quality of services which provide realistic alternatives to the car to encourage and maximise the use of sustainable transport modes. Where investment in highways infrastructure is accepted, all proposals must be accompanied by a robust justification in terms of traffic flows, scheme designs and operation.  Add in the following paragraphs from the reasoned justification to CP11 to start at paragraph 6.37:  <b>Rail</b> 6.37 A high quality public transport

		<p>network in the District will assist with sustainable economic growth and regeneration. The District falls within the West Midlands journey to work area and it is important that residents should have sustainable access to regional services including wider employment and education opportunities.</p> <p>6.38 Kidderminster is a significant rail station within the West Midlands. Recent accessibility improvements have been made to the station. Network Rail and Worcestershire County Council along with other partners are moving forward proposals and funding to deliver a new railway station building and bus station during the earlier timeframe within 2011-16. The former WMRSS Phase 2 Review also identifies the “vicinity of Kidderminster Rail Station” as a strategic park and ride site for future development. Proposals for improvements at the station should take account of this longer term need.</p> <p>6.39 Centro’s West Midlands Network Development Strategy includes proposals for connecting the Severn Valley Railway line into the national rail network. This would allow through linkages to be made by conventional rail services to Bewdley, using the Severn Valley Railway line. Such proposals will greatly assist the role of sustainable tourism in supporting the District’s economy in the future.</p> <p><b>Opportunities for Sustainable Freight Movement</b></p> <p>6.40 The former British Sugar Factory site is adjacent to a set of former rail sidings and the Severn Valley Railway line. The site therefore could have access to existing infrastructure which has the potential to be upgraded as a rail freight line to serve local industry and business in the future. The District’s inland waterway network including the Staffordshire &amp; Worcestershire Canal and the Rivers</p>
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		<p>Severn and Stour also offer longer term opportunities for the sustainable movement of freight through the District.</p> <p><b>Hoobrook Link Road</b> 6.41 The traffic congestion along the Stourport Road Employment Corridor linking Stourport-on-Severn with Kidderminster allied to the congestion experienced in Kidderminster, will potentially constrain economic regeneration activity within the Stourport Road Employment Corridor (SREC). The SREC is well placed for access to labour catchments, and travel demand to and from the area is likely to increase significantly. This will place greater pressure on the local transport network. To facilitate the regeneration of the SREC and in particular the British Sugar Site, the provision of a new link road (Hoobrook Link Road) between the A451 Stourport Road and the A442/A440 Worcester Road across the Stour Valley has been identified in the Worcestershire Local Transport Plan.</p> <p>6.42 The provision of a link road has been subject to discussion with Worcestershire County Council and Advantage West Midlands. A pre-feasibility assessment was also undertaken in early 2009. This concluded that the link road would help to address congestion problems in Kidderminster and Stourport-on-Severn as well as on sections of the A451. It would also enable the provision of bus priority measures along the A451 thereby reducing bus journey times, increasing service reliability, improving the financial sustainability of passenger transport and enhancing the accessibility of the SREC. The scheme also has the potential to enhance pedestrian/cycle infrastructure as part of the design.</p> <p><b>Stourport Relief Road</b> 6.43 High levels of traffic are channelled through the historic centre</p>
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		<p>of Stourport-on-Severn facilitated by a single river crossing. This has resulted in borderline Air Quality Management Areas within the town centre. Traffic levels also have a detrimental impact on regeneration proposals for the town and in particular the Bridge Street area. Historically the line of the Stourport Relief Road has been safeguarded and the scheme proposal was included in the indicative list of post 2004 transport schemes contained in the West Midlands Regional Funding Allocations. Limited sections of the scheme have already been provided in conjunction with development schemes.</p> <p><b>Kidderminster Ring Road</b> 6.44 Kidderminster Ring Road in particular suffers from traffic congestion which has given rise to air quality management issues, especially around Blackwell Street. The ring road has a "collar" effect on the town of Kidderminster and acts as a deterrent to people wishing to access the town centre on foot."</p> <p>Amend Policy numbering arising from the merging of Core Policies 3 and 11 as appropriate throughout the rest of the document and within the Contents Page.</p>
CC46 (HA32)	p.43 Policy CP04 Providing Affordable Housing	Amend sub-section on Rural Affordable Housing to read: "A proactive approach to the provision of affordable housing within the District's rural areas will be encouraged through working in conjunction with Parish Councils to identify appropriate sites for the sole provision of affordable housing through the site allocations process, within or immediately adjacent to the District's villages, rural settlements and other rural hamlets_where a local need exists."
CC47 (HA33)	p.43 para 7.4	Amend to read: "The District will accommodate at least 4,000 net

		additional dwellings up to until 2026. In order to met the level of housing provision, this will require an indicative annual average of 200 net additional dwellings during the plan period. The former emerging_WMRSS specified a regional affordable housing target of 35% of the net housing increase,..."
CC48 (HA34)	p.44 para 7.7	Amend to read: "The former emerging WMRSS specified that Local Planning Authorities should determine indicative separate targets for social rented and shared equity housing within their Core Strategies."
CC49 (MA18)	p.44 para 7.9	Amend to read: "Parish housing needs surveys have been undertaken for a number of the District's Parishes.* These surveys provide a snapshot on housing need within the rural parishes and also highlight a high degree of support for small affordable housing schemes to meet local needs at these settlements." *Include footnote to state that "At the time of writing Housing Needs Surveys have been completed for Upper Arley, Rock, Chaddesley Corbett, Wolverley, Cookley, Stone and Blakedown."
CC50 (MA19)	p.44 after para 7.9	Add a new sub section in to the Reasoned Justification to read: " <b>Level of Affordable Housing Provision Within the District</b> 7.10 As indicated within the SHMA, the projected affordable housing need across the District is 175 dwellings per annum. This figure equates to the majority of the total number of net additions to dwellings within the District across the five-year phasing periods as set out in DS05: Phasing and Implementation. It is therefore not realistic to assume that this level of affordable housing provision could be delivered within the District on an annual basis. As such a more realistic target for affordable housing provision has been set at 60 dwellings per annum, which is approximately 30% of the total requirement for net annual

		<p>additions of dwellings.</p> <p>7.11 This annual average of affordable housing provision will be met through a combination of measures and opportunities. These include Section 106 provision; 100% provision of affordable housing on exceptions sites and windfall opportunities."</p>
CC51 (MA20)	p.45 para 7.10	<p>Re word paragraph 7.10 to read as follows: "<b>Taking Account of Economic Viability</b> The Council commissioned an independent viability appraisal of a sample of the SHLAA sites in late 2009, with an update produced in March 2010. The key finding of the updated assessment is that an affordable housing target of 30% produced a positive residual land value in excess of the potential existing use value for all sites assessed. This improved upon the position where an affordable housing target of 40% was tested and indicates that a reduction of the affordable housing target to 30% is likely to be viable. 30% provision has therefore been set for the Core Strategy as a guiding principle."</p>
CC52 (MA21)	p.48 Policy CP06 Providing Accommodation for Gypsies, Travellers and Travelling Showpeople	<p>Amend Criterion 4 to read as follows: "4. Local community services and facilities should be within easy access from the site by a variety of modes of transport."</p>
CC53 (HA35)	p.49 para 7.22	<p>Amend to read: "The former WMRSS specified that Local Development Frameworks should ensure..."</p>
CC54 (HA36)	p.49 para 7.25	<p>Delete para 7.25</p>
CC55 (SCG2 & PCS51)	p.50 Policy CP07 Delivering Community Wellbeing	<p>Amend bullet point 6 under Developer Contributions to read: "Health and community safety (includes emergency services) facilities and services"</p>

CC56 (HA37)	p.50 para 7.27	Replace first sentence with: "The former WMRSS identified that Local Development Frameworks should make provision for the full range of requirements needed to create sustainable communities."
CC57 (MA23)	p.50 para 7.26	Add sentence at start of 7.26: "Community facilities provide for the health, welfare, social, educational, spiritual, recreational, leisure and cultural needs of the community."
CC58 (MA24)	p.52 para 7.31	Add following text to the end of para: "The strategic context for provision and requirements of outdoor recreation is set out in the Worcestershire Access and Informal Recreation Strategy"
CC59 (SCG2 & PCS53)	p.52 para 7.35	Amend the first sentence to read: "The Adopted Planning Obligations SPD will continue to be used as a basis for securing developer contributions. The Council's approach will also be informed by the national regulations for the Community Infrastructure Levy and any future proposals advocated / implemented by Government.
CC60 (HA38)	p.53 Para 8.1	Amend text to read: "The proposed strategy reflects that of the <u>former</u> West Midlands Regional Spatial Strategy and the former West Midlands Economic Strategy as well as Government advice in PPS4."
CC61 (MA26)	p.54 Policy CP08 A Diverse Local Economy	Amend 3 <sup>rd</sup> sentence of second paragraph to read as follows: "A portfolio of employment sites for a range of businesses (B1, B2 and B8) will be provided in terms of location, size and quality. The development of small scale businesses and starter units will be particularly encouraged."
CC62 (HA39)	p.55 Policy CP08	Delete last sentence of policy.

CC63 (HA40)	p.55 Paras 8.7 & 8.8	Delete paragraph 8.7.  Amend para 8.8 to read: "The provision of well located employment land that is available and capable of being developed is essential...."
CC64 (HA41)	p.55 Para 8.9	Amend to read: "The figure is closely aligned to the emerging indicative longer term requirement as identified in the former West Midlands Regional Spatial Strategy"
CC65 (HA42)	p.56 Para 8.14	Amend to read: "It will be important to assess the issues on a site-by-site basis and in accordance with CP08: A Diverse Local Economy."
CC66 (HA43)	p.58 Para 8.22	Amend to read: "The former WMRSS identifies that for the Strategic Centre of Kidderminster..."  Amend remainder of the paragraph to reflect the change in tense
CC67 (HA 44)	p.59 Para 8.23 Policy CP 09 Retail and Commercial Development	Amend last sentence to read: "This is in line with the approach set out within the former WMRSS, where variations to the figures can be justified on the basis of clear evidence".
CC68 (MA27)	p.59 Para 8.24	Update Comparison Retail Requirements in Kidderminster (Sqm) table at Paragraph 8.24 to reflect the figures set out in the White Young Green Retail Update Study as follows: Amend table title to read: <u>Gross Floor Area</u> Comparison Retail Requirements in Kidderminster (Sqm)  Kidderminster 2011 – amend figure from -433 to -2,535 Kidderminster 2016 – amend figure from 6,981 to 1,486 Kidderminster 2021 – amend figure from 15,529 to 9,343 Kidderminster 2026 – amend figure from 24,773 to 23,806  Add in table footnote to read as

		follows: *Adapted from Figure 3.6, Page 24 WYG Wyre Forest Retail and Leisure Study Update
CC69 (HA 45)	p.59 Para 8.26	Amend to read: "The former WMRSS did not set any indicative requirements for future convenience floorspace..."
CC70 (HA 46)	p.60 Para 8.29	Amend to read: "National Planning Policy identifies offices as a town centre use, and seeks to direct new office development to in-centre locations. The requirement set by the former WMRSS is for 40,000sqm (gross) of office floorspace to be provided within Kidderminster up until 2026. The rationale behind this is to direct office development to more sustainable locations which are accessible by pedestrians, cyclists and public transport."
CC71 (HA 47)	p.62 Para 8.37 Policy CP 10 Sustainable Tourism	Amend 2nd sentence to read: "These two attractions were identified within Policy PA10 of the former WMRSS as key regional tourism and cultural assets and on average they attract ...."
CC72 (MA 28)	p.62 Para 8.40	Amend footnote in association with national objectives to read: "Planning Policy Statement 4: Planning for Sustainable Economic Growth."
CC73 (SCG8/ PCS91)	p.68 Policy CP12: Quality Design / Local Distinctiveness	Amend paragraph 3 of policy to read as follows: "The emphasis on the creation of successful places will start with a careful consideration of movement routes based on well planned streets and spaces. New developments and their layouts should take into account heritage assets and where possible utilise historic streets, buildings, spaces and infrastructure as an integral part of the scheme design. Subsequent DPDs which allocate sites will take full account of the heritage assets within the landscapes and settlements. The positive management of the District's

		historic environment and heritage assets will be taken forward through the development of appropriate SPDs.”
CC74 (SCG8 / PCS91)	p.68 Para 9.5	Amend the first sentence to read as follows; “The Wyre Forest District is a considerably diverse area with particularly distinctive characteristics and heritage assets.”
CC75 (MA29)	p.68 Para 9.5	Add in the following sentence to the end of paragraph 9.5: “This policy should be considered alongside CP01: Delivering Sustainable Development Standards.”
CC76 (SCG8 / PCS91 and MA30)	p. 69 Para 9.7	Reorder paragraph 9.7 of the reasoned justification to CP12 to read as follows: “The district contains a rich heritage with a range of heritage assets including significant buildings, structures, archaeology and conservation areas including the Staffordshire and Worcestershire Canal in addition to a valued network of green infrastructure incorporating important habitats, rivers and streams. This creates an asset rich environment which will influence the location, design and use of future development and management of the public realm. Utilising existing qualities including heritage assets will help to strengthen the sense of local identity and community. If successfully incorporated, these elements will also improve the overall legibility of the place with inclusion of recognisable landmarks, spaces and points of enclosure. In summary, the strategic policies set out in the Core Policy will help to ensure the creation of successful places that are secure, active, well connected and attractive places to live and work with a clear sense of community.

<p>CC77 (SCG8 / PCS91)</p>	<p>p.69 Para 9.7</p>	<p>Add in the following new paragraph after 9.7: "The Historic Environment Technical Paper recommends that the Core Strategy should identify how the historic environment contributes to local identity. It states that the Site Allocations and Policies and KCAAP DPDs will need to layer on detail regarding specific sites. Distinctive elements of the District's historic environment are identified in the paper and these include: Industrial heritage within Kidderminster and Stourport-on-Severn The dispersed rural settlements Historic landscapes and archaeology, particularly those associated with the Wyre Forest. The Canals and waterways Cultural heritage assets such as the Severn Valley Railway.</p> <p>A Specific SPD will be produced to address details on the positive management of the District's historic environment and heritage assets. This will also need to be considered in relation to the review of the Design Quality SPG."</p>
<p>CC78 (MA31 &amp; SCG2 / PCS55)</p>	<p>p.68 Core Policy12</p>	<p>Insert the following new sentence at the end of Policy CP12: "Developers will be required to demonstrate how their proposals address community safety and crime prevention in Design and Access Statements."</p>
<p>CC79 (MA32)</p>	<p>p.70 Para 9.11</p>	<p>Insert wording after first sentence: "The particular qualities of the landscape play a major role in defining sense of place, and provide the fabric of, and home to our natural resources and biodiversity. Local residents and visitors value...."</p>
<p>CC80 (MA33 &amp; SCG8 / PCS101)</p>	<p>p.70 Policy CP13: Landscape</p>	<p>Amend to read: Landscape Character New development must protect and</p>

	<p>Character</p>	<p>where possible enhance the unique character of the landscape including the individual settlement or hamlet within which it is located. Opportunities for landscape gain will be sought alongside all new development, such that the landscape character is strengthened and enhanced.</p> <p>The Worcestershire County Council Landscape Character Assessment and Historic Landscape Characterisation will be used when determining applications for development within the rural areas. The Worcestershire Landscape Character Assessment and Historic Landscape Characterisation will form the basis for the development of supplementary guidance relating to landscape character.</p> <p>Where it is considered appropriate to the landscape character, small scale development which can reasonably be considered to meet the needs of the rural economy, outdoor recreation, or to support the delivery of services for the local community will be supported subject to it meeting all other relevant criteria within the LDF.</p> <p>Caravan, Mobile Home and Chalet Developments Applications for further mobile home, caravan and chalet developments within the District's rural areas will be resisted due to the collective impact which the existing sites have on the landscape.</p> <p>Severn Valley Regional Heritage Park The establishment of a Severn Valley Regional Heritage Park to link the historic towns and landscape from Stourport-on-Severn to Ironbridge will be supported and promoted during the plan period.</p>
<p>CC81 (MA34)</p>	<p>p. 71 Para 9.15</p>	<p>Amend 1<sup>st</sup> sentence to read: "The Worcestershire Landscape Character Assessment and Historic Landscape</p>

		Characterisation will be used when determining applications for development within the rural areas.
CC82 (MA35)	p.71 Para 9.15	Amend 2 <sup>nd</sup> sentence to read: "The Landscape Character Assessment determines the sensitivity of the landscape which may be used at a strategic level to help guide new development to the most appropriate areas."
CC83 (MA36)	p.71	<p>Insert new paragraph after 9.14: "The Worcestershire Landscape Character Assessment and Historic Landscape Characterisation will be supported through the development of supplementary guidance on landscape character".</p> <p>Amend paragraph 9.17 to read: "...a linear Severn Valley Heritage Park to celebrate and promote the Severn Valley will be supported through the development of supplementary guidance on landscape character."</p>
CC84 (MA37)	p.72 Policy CP14: Providing a Green Infrastructure Network	<p>Delete sub-section of Policy CP14 (River Severn and River Stour) and replace with the following wording; "The following features have been identified as key green infrastructure assets and essential to the district's local distinctiveness.</p> <p>The Rivers Severn and Stour and the associated wetlands; The Staffordshire and Worcestershire canal; The district's heathlands and acid grasslands; The Wyre Forest and associated areas of high landscape and biodiversity value.</p> <p>These features will be safeguarded and new developments must positively contribute towards the enhancement of their green infrastructure value."</p>
CC85 (MA38)	p.72 CP Policy 14 Providing a	Within last sub-section, amend wording slightly to read: "Where private garden

	Green Infrastructure	space is not provided for each dwelling, communal gardens or allotment spaces will be required in order to improve health and well-being, support local biodiversity and, where possible, strengthen landscape characteristics"
CC86 (MA39)	p. 73 Para 9.20	Add at end of para: "Worcestershire County Council are currently working with partners to develop a Sub-regional GI Framework which will provide a strategic context for the preparation of the District Green Infrastructure Strategy.
CC87 (MA40)	p.74 Policy CP15: Providing Opportunities for Local Biodiversity and Geodiversity	Add in additional text at end of first para under New Developments and Biodiversity: "On brownfield sites, consideration should be given to incorporating existing flora and fauna where appropriate in order to preserve the site's ecological and biodiversity value.  New development should take account of the location of, and aim to contribute to, the priorities established by the Worcestershire Biodiversity Partnership within the Biodiversity Opportunity Areas".
CC88 (MA41)	p. 74 Policy CP15 Geodiversity section	Amend to read: "New development must strive to enhance, and not have a detrimental impact on the geodiversity of the District."
CC89 (MA42 & SCG6 / PCS137)	p.75 Para 9.28	Amend para to read: "Requiring all major new developments to make a contribution towards biodiversity projects will help to achieve BAP objectives.  New developments can best achieve this by: <ul style="list-style-type: none"> <li>• Ensuring that all identified BAP habitats are safeguarded;</li> <li>• Incorporating SUDS wherever feasible in new developments;</li> <li>• Ensuring that culverted watercourses are restored where</li> </ul>

		they fall within the site of a new development.”
CC90 (MA43)	p.75 Paras 9.28 - 9.29	Insert new para between 9.28 and 9.29 and renumber subsequent paras accordingly:  “The Worcestershire Biodiversity Partnership has adopted the concept of working at a landscape-scale to restore and enhance biodiversity, reflected in the development of the Biodiversity Opportunity and Priority maps*. An immediate priority for biodiversity action within the county is restoring the fragmented acid grassland and heathland sites within Wyre Forest District.”  “*Worcestershire Biodiversity Partnership”
CC91 (MA44 & SCG6 / PCS138)	P.76 Para 9.31 Policy CP16: Regenerating the Rivers and Canal	Add in new sentence at the end of para “This policy is also linked to CP13: Providing a Green Infrastructure Network and CP14: Providing Opportunities for Local Biodiversity and Geodiversity”
CC92 (MA45 & SCG6 / PCS138)	p.76	Amend 1 <sup>st</sup> bullet point under Rivers: “All proposals for development in or adjacent to the District’s rivers and/or within an area at risk of flooding must take into account Core Policy 2: Water Management and the Strategic Flood Risk Assessment.”
CC93 (HA48)	p.79 Para 10.3 Monitoring and Implementation Framework	Delete 4 <sup>th</sup> bullet point: “The monitoring requirements of the West Midlands Regional Spatial Strategy”
CC94 (MA46)	pp.82 – 89  Monitoring and Implementation Framework	Amend the contingency planning column as follows:  Page 83 – Policy CP02: Water Management to read: “If more than 5 per annum re-assess the Environment Agency’s role in the Development Team

		<p>Approach at pre-application stage.</p> <p>Page 84 – Policy CP03: Promoting Transport Choice and Improving Accessibility amend to read as follows: “If below 80% request more active involvement from WCC under Transport Assessment Guidelines.”</p> <p>Page 86 – CP08 – A Diverse Local Economy amend last contingency planning point to read as follows: “Liaise with local business support groups through the Re-Wyre Initiative.”</p> <p>Page 86 – CP09: Retail and Commercial Development amend 2<sup>nd</sup> contingency planning point to read as follows: “Improve partnership working and delivery with town centre partners through the Re-Wyre initiative.”</p> <p>Page 87 – Delete CP11 – Strategic Transport Infrastructure as this policy has been merged with CPO3. Move the remaining text in columns to Page 84 under Policy CPO3. Amend contingency planning points as follows:</p> <p>“If interchange improvements are not delivered by 2013 then facilitate more effective liaison with delivery partners and reassess funding.”</p> <p>Effective partnership working with WCC to deliver priorities. Ensure that LTP transport priorities remain high on the Worcestershire Partnership’s priorities for funding purposes.</p> <p>Add Worcestershire Partnership into the list for Implementation.</p>
<p>CC95 (SCG8 / PCS107)</p>	<p>p.87 Monitoring and Implementation Framework</p>	<p>Add in the following indicators at the under CP11: Quality Design and Local Distinctiveness:</p> <p><u>Indicator:</u> Proportion of Heritage Assets at Risk. <u>Target:</u> Decreasing trend. <u>Contingency Planning:</u> If an increasing</p>

		<p>trend is shown over a 5-year period look at policy implementation relating to enabling development, CiL provisions and planning enforcement. <u>Data Source:</u> In house monitoring, 5 yr survey, GIS Assessment.</p> <p><u>Indicator:</u> No of planning applications resulting in the positive enhancement of a locally designated heritage asset. <u>Target:</u> A relative increase in % year on year <u>Contingency planning:</u> If a decreasing trend is shown in a 5 year period then re-examine policy implementation including the possible use of Article 4 Directions. <u>Data Source:</u> Local List and In House Monitoring</p>
CC96 (HA49)	p.90 A Profile of Wyre Forest District Council Para A.3	<p>Amend 1<sup>st</sup> sentence to read: "Kidderminster (56,000) is the main centre for commerce."</p> <p>Amend last sentence to read: "It is one of 25 Strategic Centres in the West Midlands."</p>
CC97 (MA47 & SCG2 / PCS50 & HA50)	p.94 Para B.1 Appendix B: Infrastructure Schedules	<p>Amend final sentence of para to read: "They have also been informed by the Baker Associates/TPI Strategic Infrastructure Requirements Study for Worcestershire undertaken in 2008."</p> <p>Insert new para to read: "B2 The schedules do not include costings for environmental infrastructure at this stage. It is difficult to provide an estimate without more detailed information on site specific proposals. Environmental Infrastructure will need to include green infrastructure and open space; sustainable drainage systems; individual water supply and waste water infrastructure; the implementation of new flood risk reduction measures and enhancements for biodiversity geodiversity and heritage.</p>

		<p>Insert new para to read: "B3 More detailed information on infrastructure requirements, including emergency infrastructure, will inform the Site Allocations and Policies and Kidderminster Central Area Action Plan DPDs. Delivery agencies and potential funding bodies are identified within the Monitoring and Implementation Framework. Delete footnote following table on p.96.</p>
<p>CC98 (MA 48)</p>	<p>pp.94-96 Infrastructure Schedules</p>	<p>Add new column into the Infrastructure Schedule Table – <u>Funding Sources and Delivery Agencies</u>. To include following wording against the 5 year phases:</p> <p>2006-2011: Transport – LTP 3 Funding and Worcestershire Partnership / Section 106 Funding</p> <p>Social Infrastructure: Education and Community Centre– Worcestershire County Council and Section 106 Contributions</p> <p>Open Space Provision: – S106 Contributions, Worcestershire Partnership/Local Area Agreement</p> <p>2011-2016: Rail Improvements: – Regional Funding Allocation secured by Worcestershire County Council, NSIP (£1 million) and £75,000 S106 Monies.</p> <p>Hoobrook Link: - LTP3 Funding, Regional Funding/AWM, developer contributions</p> <p>Enhanced bus and cycle networks: – LTP3, Worcestershire Partnership and S106 contributions.</p> <p>Health services: – Primary Care Trust</p> <p>Education Contributions: – WCC and S106 monies</p> <p>Community Centre: – Worcestershire</p>

		<p>Partnership and developer funding</p> <p>Library Provision: – Worcestershire County Council</p> <p>Open Space: – S106 contributions and LAA Funding</p> <p>Ambulance Station: – Government funding &amp; S106 contributions or CIL</p> <p>Emergency Services (Fire/Rescue &amp; Police): - Government funding &amp; S106 contributions or CIL</p> <p>Household Waste: – Worcestershire County Council and Wyre Forest District Council</p> <p>2016-2021: Improvements to bus and cycle networks: – LTP 3 Funding and Worcestershire Partnership and S106 monies.</p> <p>Improvements to Kidderminster Ring Road: - LTP 3 Funding and Worcestershire Partnership. S106 monies. Regional funding brought in through the Re-Wyre Initiative.</p> <p>Education Contributions: – Worcestershire County Council and S106 monies</p> <p>Community Centre Space: – Developer funding</p> <p>Library Provision: – Worcestershire County Council</p> <p>Open Space Maintenance: – S106 monies and Wyre Forest District Council</p> <p>Health facilities: – Primary Care Trust</p> <p><u>2021-2026:</u> Stourport Relief Road: – Regional Funding and developer contributions</p> <p>Enhanced bus and cycle networks: – LTP3 Funding, Worcestershire</p>
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		<p>Partnership and S106 contributions.</p> <p>Education and community contributions: – Worcestershire County Council and S106 Contributions</p> <p>Open Space Maintenance: –Wyre Forest District Council and S106 contributions.</p>
CC99 (HA51)	p.102 Jargon Guide: Area of Development Restraint	Area of Development Restraint – Keep definition as it is now referred to as a result of amendments made to Policy DS01
CC100 (HA 52)	p.103 Jargon Guide: General Conformity	Amend to read: “Prior to the revocation of Regional Spatial Strategies on 6 <sup>th</sup> July 2010, a Local Development Document was required to be in general conformity with the strategy and proposals set out within the Regional Spatial Strategy as assessed by the then Regional Planning Body (West Midlands Regional Assembly).”
CC101 (MA49)	p.103 Jargon Guide	Insert as additional term: “Geopark - A geopark is an area which consists of one or more sites of scientific importance for geological, ecological, archaeological or cultural value. The Abberley and Malvern Hills Geopark falls within the counties of Herefordshire, Gloucestershire, Shropshire and Worcestershire and covers 1250 square kilometres. The geological and geomorphological significance of the area has been recognised for many years with 13 Sites of Special Scientific Interest (SSSI) and 179 Local Geological Sites (LGS) present.”
CC102 (HA53)	p.104 Jargon Guide	After Heritage, insert: “Horsiculture – the commercial development of the countryside for pasturing or exercising horses”.

<p>CC103 (HA54)</p>	<p>p.104 Jargon Guide: Major Urban Areas (MUSs):</p>	<p>Amend to read: "The focus of Urban Renaissance which underpinned the strategy set out within the Former WMRSS. Of the 4 MUAs established within the former WMRSS, Birmingham and the Black Country have the most relevance to the Wyre Forest District".</p>
<p>CC104 (HA55)</p>	<p>p.106 Jargon Guide: Strategic Flood Risk Assessment (SFRA)</p>	<p>Amend to read: "A Level 1 and Level 2 SFRA has been produced to inform the production of the Core Strategy. These studies have been carried out in accordance with PPS25: Development and Flood Risk and assess all sources of flood risk within the District. The studies identify the functional flood plain, review flood defence infrastructure, identify risks behind defences, analyse site specific flood risk and take into account the effect of climate change."</p>
<p>CC105 (HA56)</p>	<p>p.106 Jargon Guide: Sustainable Community Strategy</p>	<p>Amend last sentence to read: "These themes have been addressed through the Core Strategy."</p>
<p>CC106 (HA57)</p>	<p>p.107 Jargon Guide: Water Cycle Strategy</p>	<p>Insert after Tree Preservation Order: "Water Cycle Strategy – The Water Cycle Strategy assesses the constraints and requirements that may arise from the scale of the proposed development on the water infrastructure in the District. The report focuses on potential development sites and assesses the flood risk, water supply, sewerage infrastructure, wastewater treatment, river quality and demand management measures. These are discussed in more general terms."</p>
<p>CC107 (HA58)</p>	<p>p.107 Jargon Guide: WMRA</p>	<p>Delete: "West Midlands Regional Assemble (WMRA) history and definition</p>
<p>CC108</p>	<p>p.107 Jargon</p>	<p>Add sentence after definition to</p>

(HA59)	Guide:  WMRSS	read: "Regional Spatial Strategies were revoked on 6 <sup>th</sup> July 2010" and change verbs in 2 <sup>nd</sup> sentence to past tense.
CC109 (HA60)	pp.97-99  C: Saved Policies to be replace by Core Strategy	Add new paragraph in after the table of Saved Local Plan Policies to be replaced as follows:  "C.3 Worcestershire County Council also saved a number of Structure Plan Policies from the Worcestershire County Structure Plan beyond September 2007 under the provisions of the Planning and Compulsory Purchase Act. The table below indicates those Structure Plan Policies which will be replaced by the Core Strategy within the District's Local Development Framework."  And include table of replaced policies as set out to Appendix 1 of the District Council's Hearing Statement in relation to Matter 1 – Procedural Matters and Legal Compliance.
CC110 (HA61)	p.83 Monitoring & Implementation Framework Policy DS05	Amend the target column to read: 2006/07-2010/11 – 240 dwellings pa 2011/12-2015/16 – 326 dwellings pa 2016/17-2020/21 – 196 dwellings pa 2021/22-2025/26 – 94 dwellings pa
CC111 (HA62)	p.84 Monitoring & Implementation Framework – Policy CP05	Include "Housing Market Assessments" under the Implementation column  Amend the Contingency Planning column for the indicator "% of residential completions with 2 or more bedrooms excluding flats" to read: "Regularly reassess the need for particular housing types through the Housing Market Area Assessment process and amend Policy CP05 as appropriate to reflect any emerging increasing needs for a particular house type"

## APPENDIX B – CHANGES THAT THE INSPECTOR CONSIDERS ARE NEEDED TO MAKE THE PLAN SOUND

This change is required in order to make the Core Strategy sound.

Inspector Change No.	Policy or section	Change
IC1	Explanatory text to Policy DS02	<p>Amend/replace the second sentence of paragraph 5.26 as follows:</p> <p><b>“This site provides a large opportunity to provide new industry and employment opportunities. However, due to viability concerns it may be necessary to consider a mixed use approach as part of the Site Allocations and Policies DPD to deliver this potential, including a significant area of residential.”</b></p>