

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Bradley J	SALPO20	Omission	<p>Please note, our land 'Bradley's Paddocks' is included within H129.</p> <p>Comments re Negative Impacts:</p> <ul style="list-style-type: none"> • Loss of open views - the open views are only visible by actually entering the site. • Agricultural Grading - the land is predominantly Grade 3b with a considerable proportion as Grade 3a - not grade 2 as stated. • Any new development on undeveloped land will impact on Kidderminster and Stourport-on-Severn regeneration and of course noise and light pollution are increased but this subsequently means that the tight band of development around the towns will never expand and cater for the growing population. This subsequently means higher property prices and greater demands on social housing. 	<p>Comments are noted. These comments relate to the Sustainability Appraisal and has also been considered under this considered under this document. Re-consider the loss of views, re-check the agricultural land classification map. With regards to the regeneration of Kidderminster and Stourport-on-Severn the priority is to bring forward brownfield sites within these areas as set out through the Core Strategy. It is acknowledged that most new development will have an impact on noise and light pollution and that mitigation measures will need to be put in place to address this.</p>
Lawson J	SALPO21	General Comment	<p>Overall paperwork and documentation well presented and helpfully explained. We all ought to be more active in development and supporting transport action plans to make people come to Wyre Forest area.</p>	<p>Support is welcomed and noted.</p>
Mrs P Harries	SALPO33	General Comment	<p>Fairground owner monopolising Stourport-on-Severn. Too many vehicles and unused trailers strewn around the riverside causing an eyesore and public hazard.</p>	<p>Comments are noted, however, this issue lies outside of the LDF remit.</p>
Natural England	SALPO37	General Comment	<p>Thanks authority for consulting Natural England and sets out the background to the organisation.</p>	<p>Support is welcomed and noted.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>Expresses general support for the Site Allocations and associated Sustainability Appraisal. Acknowledges that there is clear evidence that the Sustainability Appraisal has been used to inform policies.</p>	
Coal Authority	SALPO55	Omission	<p>Sets out background to the Coal Authority.</p> <p>Identifies that parts of Wyre Forest District contain coal reserves which should not be unduly sterilised by new development.</p> <p>Highlights the fact that there may be issues with land stability in some areas of the District as a result of the legacy of previous mining activity. This needs to be considered when allocating sites so as not to lead to future public safety hazards.</p> <p>Questions whether the DPD is consistent with national policy - whilst the proposed settlement hierarchy and development strategy is unlikely to have any significant impact in relation to sterilising coal reserves, it should be noted that the settlements of Clows Top, Rock and Arley are located within the surface coal resources area. Although the development in these areas is limited, it could have the potential to sterilise resources. As the Minerals Core Strategy for Worcestershire is not in place it is necessary to address this through the Wyre Forest District Core Strategy in order to ensure that resources are not sterilised in accordance with MPS1 and MPG3.</p>	<p>Comments are noted. Additional text for inclusion in the Core Strategy was requested at Publication Stage. This was forwarded to the Planning Inspector for consideration but there was no reference to it in his binding report and so no amendment was made to the Core Strategy. Consider including the suggested text within the Publication version of the Site Allocations and Policies DPD.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>Previously in relation to the Core Strategy The Coal Authority requested the following additional text is for inclusion within the Reasoned Justification to address this issue:</p> <p><i>"Impact on Mineral Resources</i> <i>There are limited surface coal resources within parts of Wyre Forest District. In particular, the rural settlements of Clows Top, Rock and Arley are located within the surface coal resource area. Where new development is proposed within these areas, consideration should be given to any impacts in relation to the sterilisation of the coal resource, along with whether the prior extraction of coal resources would be suitable and/or appropriate, as part of the development process."</i></p>	
Bovale Limited	SALPO215	Omission	<p>3.56 Ha site owned by Bovale Limited is situated off Stourport Road, Bewdley. Previously made representations to Core Strategy explaining merits of site to accommodate budget hotel / elderly persons care facility. Site is bordered by A456 and B4195 (Stourport Road) and a public right of way. Site is generally flat but has steep bank to east acting as visual and acoustic barrier to A456. At its northern corner it abuts the Severn Valley Railway.</p> <p>Consider that a review of the settlement boundary to include both the leisure centre, High School and the proposed site would represent a natural extension to Bewdley.</p> <p>We would like to see site removed from Green Belt</p>	<p>Comments are noted. However, this site lies within the Green Belt and the Core Strategy provides a clear Development Strategy which directs development to brownfield sites and does not allow development in Green Belt locations. Therefore it is considered that this site is not suitable for allocation and that there are sufficient other sites available to meet the requirement, which are in sequentially preferable locations.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			and included in settlement boundary to accommodate future development needs for the town. It is in a sustainable location and would provide an area which is large enough to accommodate a comprehensive mix of uses. It is unconstrained in terms of traffic unlike other town centre sites.	
Asda Stores Ltd	SALPO175	General Comment	We would highlight the need for consistency between the Site Allocations & Policies DPD, the Kidderminster Central Area Action Plan DPD and the Churchfields Masterplan SPD e.g. regarding the development of new light and general industrial uses within the Churchfields Business Park area.	Comments are noted. Review the three documents to check for any areas where the approach may be considered to be inconsistent.
West Mercia Police	SALPO251	Omission	<p>Without risk of prejudicing the findings of the forthcoming Strategic Infrastructure Assessment and with the objective of supporting its delivery in the District, we propose that either the SALP or the KCAAP contains two new policies safeguarding the existing principal police and fire station sites in Kidderminster, both for their current uses and anticipated future expansion to meet the demands of planned development growth. Suggest the following:</p> <p><i>The Headquarters site as shown on the proposals map will be safeguarded for police and related uses. Proposals for the development of the site for police service and related uses will be encouraged and supported wherever possible.</i></p>	Noted. Kidderminster Fire Station falls within the KCAAP boundary. The facilities are currently identified on the Proposals Map as community facilities and this will be carried forward. The facilities will be protected under policy CP07.
WCC - Transport Policy & Strategy	SALPO87	General Comment	WCC considers this to be a well written, supportive and comprehensive document.	Noted. Include a reference to the LTP3 policies within the Publication version.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			Please could the document make reference to the "LTP3 Development Control Policy", the "LTP3 Accessibility Policy" and the "WCC Requirements for Transport Assessments" on a site specific basis.	
Chaddesley Corbett Parish Council	SALPO118	General Comment	We agree with the policy in general and if you achieve your end goal of regeneration it would provide jobs for the area.	The Parish Council's support is welcomed.
Bournewood Nurseries	SALPO299	Omission	<p>Bournewood Nurseries should be considered for residential uses. The site is brownfield because of its previous commercial occupancy and use as a garden centre. Identifies factors in favour of the site:</p> <ul style="list-style-type: none"> • Topography is good • It lies on a regular bus route with a good frequency. • It is in flood zone 1 (low probability) • Drainage, water, gas, electricity, and telephone services are available to serve the site. • Site can accommodate required density and level of affordable housing and could be considered for a 100% affordable housing scheme built by a Registered Social Landlord. • The site has a mature natural boundary. <p>Identifies that there is a recognised shortage of brownfield sites within Stourport and that this site is available and should therefore be allocated for housing development.</p> <p>Acknowledges that the site is in the Green Belt and as such a case may have to be prepared for relaxing the</p>	The Bournewood Nurseries site lies in the Green Belt and is considered to be a greenfield site because of its previous usage. The Green Belt boundary has not been amended and therefore, the allocation of this site for residential development would be contrary to the policies set out within the Adopted Core Strategy.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			Green Belt policy/amending the boundary.	
National Grid	SALPO343	General Comment	Sets out background information on National Grid.	Comments are noted.
National Grid	SALPO344	General Comment	Sets out background information on National Grid's infrastructure within the District. Sets out the consultations which National Grid wish to be consulted on.	Comments are noted.
Wolverley & Cookley Parish Council	SALPO322	Omission	Requests that provision for allotments in Wolverley is included within the LDF. Parish Council have been working with a local allotment society over the last 18 months to locate a suitable site but this has been to no avail.	Comments are noted. Officers will seek to discuss this further with the Parish Council to try and identify a suitable site.
Horton Estates Ltd	SALPO354	Omission	<p>Suggests that Cursley Distribution Park be allocated for live-work units.</p> <p>The site has been marketed at very competitive rent but no occupiers have been found. Believe that this reflects the building's age and inflexibility - neither of which meet modern requirements. The properties represent a substantial mass of PDL in the Green Belt where redevelopment to a more sensitive scale and form represents an opportunity to enhance the site's impact on the environment as well as securing a more self-contained/sustainable form of development for which there is not a 'strong presumption in favour of planning permission'.</p> <p>Refers to PPS4 and its requirement for local authorities to facilitate new working practices such as live-work. Argues that the emerging plan makes no provision for this and considers the site is an excellent</p>	Comments are noted. Officers will seek to meet with the owners and agents of the site to explore the possibilities that might be available within this location.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>way to redress this.</p> <p>Stresses the following:</p> <ul style="list-style-type: none"> • Site is already in employment use although not generating any real and sustainable employment at the moment. • Site is exposed with substantial built form which suffers from a number of deficiencies. • Redevelopment to provide live-work units will enhance the appearance of the Greenbelt in this area. • Live-work units are by their nature a highly sustainable form of development. • The site is of sufficient size to accommodate a live-work scheme which will support local employment opportunities which do not presently exist because development is concentrated in the main centres. <p>In light of the above I wish to propose that this site is identified for redevelopment to provide live/work units. I would also welcome an opportunity to discuss this further with you at an early opportunity.</p>	
Core11	SALPO8	Paragraph 1.1	Support LDF vision and proposals	Support is welcomed
Core11	SALPO9	Paragraph1.2	Paragraph 1.2 sets out the route for identifying specific sites for development as: the Adopted Core Strategy, The Site Allocations and Policies DPD and the KCAAP. This is not correct as the KCAAP does not identify any sites or projects outside of its boundary.	The Core Strategy sets the overarching vision for the District, the level of development required and the strategy for locating that development. Both the Site Allocations and Policies and the KCAAP will allocate sites for accommodating this development. However, the Kidderminster

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
				Central Area Action Plan will only allocate sites within the Kidderminster Central area.
Core11	SALPO10	Paragraph 1.3	The Core Strategy sets out the strategy and vision for the area however, it does not include infrastructure. The green corridors and pathways should be seen as a priority as they will provide many benefits. New development requires infrastructure to be in place first. A plan is required to identify the many areas of Green Infrastructure.	The Green Infrastructure Study identifies all areas of existing green infrastructure. The emerging Green Infrastructure Strategy sets out the contribution which new development will need to make to the green infrastructure network.
Core11	SALPO11	Paragraph 1.4	Line 2-3 - the KCAAP should also designate land for open space and community uses and these sites should be identified for consultation.	The KCAAP includes areas for open space. This is set out for consultation within the Preferred Options Paper
Core11	SALPO12	Paragraph 1.4	<p>1/ Line 2-3 (KCAAP)- The designation of areas for Open Space and Community use</p> <p>2/ Comment - (KCAAP) Will this policy be addressed in the Management Policies, as these will apply to areas across the whole of the district. If so specific areas will need identifying to allow comment or amending.</p> <p>3/ What is the position regarding planning applications and permission for the allocated areas.</p>	<p>1) The KCAAP DPD has undergone a Preferred Options consultation alongside the Site Allocations and Policies DPD. The Preferred Options Paper has identified the areas for development.</p> <p>2) The KCAAP DPD sets out development management policies for the KCAAP area in addition to those which are set out in the Site Allocations and Policies DPD Preferred Options Paper.</p> <p>3) Development on all allocated sites will be required to go through a planning application process.</p>
Environment Agency	SALPO247	Paragraph 1.9	We would expect the final Infrastructure Delivery Plan to include environmental infrastructure, linked to the Water Cycle Strategy. The Sequential Test (Flooding)	Noted. Both documents form important parts of the evidence base to inform the site selection process.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			should also be informed by the Level 2 SFRA. Both documents once completed should inform the phasing and selection of sites for development.	
English Heritage	SALPO325	Paragraph 1.10	Para. 1.10 -11 lists studies and technical reports but there is no specific reference to any historic environment evidence base. Some aspects may be covered by emerging urban design Advice and Green Infrastructure Strategy. to accord with PPS5 we recommend that subsequent documents clearly explain the historic environment and heritage assets as part of the evidence base eg. conservation area character appraisals and management plans, local lists and Historic Environment Record. For the rural areas, Historic Landscape Characterisation could be referred to.	Comments are noted. Include references to the existing historic environment evidence base document and the Historic Landscape Characterisation within the Publication document.
Core11	SALPO28	Paragraph 1.11	Core11 note the elements of the evidence base that are still emerging.	Noted. The emerging elements of the evidence base will be finalised for the Publication stage.
West Mercia Police	SALPO218	Paragraph 1.11	It is not clear how any emerging draft Infrastructure Development Plan (IDP) has informed the preferred option paper. WMP intend to submit a detailed Strategic Infrastructure Assessment (SIA) with consultants. Suggest that SIA is added to list at para. 1.11	Comments are noted.
Core11	SALPO27	Paragraph 1.13	SPD is required to inform the procedure for planning applications for walkways and cycling pathways. within the Core Strategy and as per PPG17 para. 1.7	The District Council is not currently intending to prepare such an SPD, guidance is set out within the Adopted Core Strategy and the emerging Site Allocations and Policies and KCAAP DPDs.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Core11	SALPO13	Paragraph 1.14	Suggests that an SPD is required to inform planning applications for paths and walkways and cycling and also to set out the procedure for carrying out works related to green infrastructure sustainability.	The District Council is not currently intending to prepare such an SPD, guidance is set out within the Adopted Core Strategy (policy CP13) and the emerging Site Allocations and Policies (policy 22) and KCAAP (policy 18) DPDs.
Core11	SALPO29	Paragraph 1.18	Core11 notes the retaining of the 2004 proposals map	The Proposals Map will be updated at the Publication stage to include the new sites and the elements retained from the 2004 Adopted Proposals Map.
St Francis Group	SALPO219	Paragraph 1.18	To avoid any confusion, it is recommended that the Site Allocations and Policies document at paragraph 1.19 should be more explicit and state that the red line plans that accompany each of the site allocation policies <i>will replace</i> the allocations identified on the Local Plan proposals map.	Comments are noted.
Core11	SALPO24	Paragraph 2.5	Paragraph 2.5 - Key Questions: There are no missing sites. However, a plan of walking and cycling routes, initially around the outskirts of the District, which would not interfere with the KCAAP needs to be evolved to allow the green infrastructure network to be developed. These sites or projects are inexpensive and will reveal some of the problems in various parts of the district while not delaying other projects. A draft plan will recognise the contribution of green infrastructure, and allow work to start on this strategy from the beginning at little cost.	Support is welcomed and noted. The emerging Green Infrastructure Strategy sets out the aspirational green infrastructure network for the District and a delivery plan for this.
Core11	SALPO25	Paragraph 2.5	Borrington Park is a missed site which should be listed as a WFDC asset because the site provides a significant community recreational area for all ages. It	Comments are noted. Borrington Park will be included on the Proposals Map as Public Open Space and will be protected under

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>runs alongside a wetlands area and close to water meadows. It is of biodiversity value and runs parallel to the Green Belt giving it sustainability. It is part of a natural drainage area and is of interest to Natural England and Worcestershire Wildlife Trust.</p> <p>Borrington Park is RSL owned which will assist in any consultations with the land owner.</p>	Policy 22 - Providing a Green Infrastructure Network.
St Francis Group	SALPO220	3 - A Sustainable Future - Development Strategy	Although, it is considered that the section detailing development since 2006 is helpful at this moment in time, it is considered that this part of the document will quickly become out of date and unnecessary. In light of this, it should be removed from the Submission Draft.	Noted. However, this information provides important evidence to inform the site selection process. It also helps people not as familiar with the planning process to understand what is required and why, as the plan period runs from 2006 - 2026. Consider reducing this section for the draft submission of the document but its inclusion is considered to be useful.
Core11	SALPO30	Paragraph 3.3	At line 1 <residential: 4000 dwellings (district wide) should also note open space requirements.	The findings of the PPG17 audit are summarised in the tables below paragraph 7.16 which show an overall deficit across all typologies by 2026.
Herefordshire & Worcestershire Earth Heritage Trust	SALPO126	Paragraph 3.10	In the list of issues in the adopted Core Strategy, you quite correctly list "Safeguarding biodiversity". However, CP 14 is "Providing Opportunities for Local Biodiversity and Geodiversity" The list in this document should therefore read: "Safeguarding Local Biodiversity and Geodiversity"	Noted. Amend bullet point to read safeguarding local biodiversity and geodiversity.
Moss K	SALPO151	Paragraph 3.10	Endorse Core Strategy objectives set out at para. 3.10. believe allocation of Clows Top Garage site would assist in meeting objectives	Support is noted and welcomed.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Moss K	SALPO156	Paragraph 3.11	Strict application of the hierarchal approach could result in an opportunity to develop a brown field site in a rural area e.g. Clows Top garage (which could bring significant and important benefits to a rural community) being overlooked in favour of other brownfield sites that do not bring such immediate benefits.	Comment is noted. The development strategy of the Adopted Core Strategy also includes indicative figures for the allocation of housing developments across the District. Bewdley and the rural areas should accommodate in the region of 10% of total new housing growth within the District.
Barratt Homes	SALPO304	Paragraph 3.11	Generally support principles of Core Strategy and Site Allocations preferred options paper but concerned that if sequential approach outlined at para. 3.11 is taken at face value, if additional sites come forward in Kidderminster, then is possible that identified sites elsewhere may not be needed to meet housing requirement. This could impede regeneration elsewhere including Blakedown.	Comment is noted. The development strategy of the Adopted Core Strategy also includes indicative figures for the allocation of housing developments across the District. Bewdley and the rural areas should accommodate in the region of 10% of total new housing growth within the District.
Barratt Homes	SALPO305	4 - A Desirable Place to Live	It is pleasing to see the BWM Stourport Waterside development featured on P.14 in the section "A Desirable Place to Live".	Noted
Moss K	SALPO174	Paragraph 4.3	Generally support but would wish to see additional wording: "or in rural areas where the redevelopment of previously developed land will meet other Core Policies". This would allow flexibility to consider community benefits of development.	Comments are noted. However, the Adopted Core Strategy clearly specifies that the focus of development will be Kidderminster and Stourport-on-Severn. Consider adding in a sentence to reflect the policy for development in the rural areas.
Environment Agency	SALPO253	Residential Land Allocations	We would query whether the phasing of sites for residential provision has been fully informed by the WCS and the emerging Infrastructure Delivery Plan. Your WCS identified sewerage and waste water treatment constraints at a number of sites, some of	Noted. However, the vast majority of sites selected in the preferred option are classified as green/yellow in the WCS. There are known issues with drainage within the Clows Top area and the

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>which are listed in the table in 4.8</p> <p>For example The Terrace, Clows Top site is phased to come forward within 2011-2016, earlier then other sites, yet this site is identified within the WCS as requiring a major upgrade for sewerage infrastructure and wastewater treatment i.e. red box in table 22A-D of WCS, referred to in para 5.71 of your Councils Core Strategy (CS) for phasing and implementation (DS05).</p>	<p>Council are considering looking at a larger redevelopment opportunity which would help to alleviate the issues within this area through providing a critical mass of development to make improvements viable. This would come through via the development management process but the site specific policy will be amended to highlight the drainage issues within this particular location.</p>
St Francis Group	SALPO217	Residential Land Allocations	<p>It should be noted from the outset that whilst St Francis Group supports the principle of development on the site, objection is raised to the proposed phasing strategy for the former British Sugar site advanced in the Site Allocations and Policies Preferred Options document. As evidenced in this document the phasing strategy is not justified, not consistent with national policy and not effective as defined by PPS12. The delivery of the former British Sugar site, which is a key site within the District as a whole, should not be held back to later in the plan period.</p>	<p>Noted. The phasing strategy is indicative and was included to inform the housing trajectory. It is not proposed that this would seek to stifle development should sites come forward before the date identified within the document. In terms of the British Sugar site, it is anticipated that the development of this would be 'phased' anyway and so would be developed out over a longer period of time.</p>
Homes & Communities Agency	SALPO274	Residential Land Allocations	<p>The HCA broadly supports the residential land allocation proposals identified within the site allocations and policies consultation document</p>	<p>Comments are noted and support is welcomed.</p>
Environment Agency	SALPO254	Residential Land Allocations	<p>For any new development early liaison between the developer, local planning authorities and the water company is essential to ensure that the relevant engineering infrastructure is in place (as opposed to quantity of water available through the company's water abstractions) to allow water to be supplied to</p>	<p>Noted. Severn Trent Water are consulted on all our documents and were involved in the Water Cycle Strategy and are therefore well aware of our development proposals within the District. The comments received on the strategy were that water issues were</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			new developments.	not a problem within Wyre Forest District and that the proposed development could be accommodated.
Barratt Homes	SALPO307	Residential Land Allocations	The allocation of the Blakedown Nurseries ADR for development during 2011-16 is welcomed.	Comments are noted however the phasing periods are indicative and were included in order to inform the housing trajectory.
Barratt Homes	SALPO308	Residential Land Allocations	Generally supports principle of targeting growth to main towns but concerned that existing employment sites are being considered for residential uses when further industrial land is needed.	Comments are noted. All employment sites being considered for residential land use have been considered as part of the Employment Land Review.
Moss K	SALPO176	Paragraph 4.5	Whilst this addresses indicative locations referred to in Adopted Core Strategy at para. 5.8, it ignores indicative percentages of distribution. The inclusion of the Clows Top Garage site would allow the early delivery of new homes and enabling development to meet local need and bring a range of planning gain to the village and rural community in order to meet other Core Policy objectives.	Comments are noted. The figures in DS01 are indicative figures to support the housing trajectory. Consider extending the allocation at Clows Top whilst being mindful of cross-boundary issues and housing need.
Moss K	SALPO158	Paragraph 4.6	Support proposal to include flexibility in dwelling number allocations. Urban sites will be more susceptible to delays so number of allocations should be increased to ensure delivery targets are met.	Comments are noted.
Mellor P	SALPO4	Paragraph 4.8	Proposed 37 dwellings. The Parish Council's Housing Needs Survey identified a need for just 17 affordable housing units. Development of 37 dwellings would have a detrimental impact on Blakedown, including	Comments are noted. The site would need to deliver the level of affordable housing identified through the Parish Housing Needs Survey. This site has been identified as the most suitable site for this purpose in conjunction with the Parish Council and has been earmarked for future housing needs

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<ul style="list-style-type: none"> • increased traffic • access issues onto Belbroughton Road and increased volumes using Birmingham Road junction • affect on Forge Lane residents/access • loss of on street parking for Belbroughton Road residents • effect on Green Belt - intrusion into countryside, noise and light pollution • potential water run off into the Pools • effect on existing services (sewerage capacities, etc) • effect on Primary School intake • continued pressure on Haybridge School • disregard of Parish Plan • disregard of Housing Needs Survey • loss of ribbon development pattern • loss of amenity for neighbouring residents - intrusion into gardens 	<p>through previous Adopted Local Plans. In order to deliver the affordable housing, it may be necessary to allow some enabling market housing to make the scheme financially viable.</p>
St Francis Group	SALPO221	Paragraph 4.8	<p>In terms of the quantum of development, the figure of 300+ dwellings is supported. It is consistent with the Inspector's Report and Core Strategy, which refers to "including a significant area of residential". As demonstrated to the Council through a comprehensive Masterplanning exercise, the site is capable of delivering 320 dwellings. Subject to detailed design of the site and depending upon the appropriate density (to ensure the site is used efficiently yet reflects the local character of the surrounding area), it is possible that the total dwelling yield could increase or decrease.</p>	<p>Noted. It is agreed that the indicative quantum of development will be further refined through ongoing work on the masterplan.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
St Francis Group	SALPO222		<p>In terms of the timescales for delivery, the approach to phasing housing sites is considered to be superficial and unnecessary. Development should not be constrained by such a policy approach as it will result in delaying the regeneration of the site, the wider area and District as a whole, which would compromise the achievement of a number of objectives, including facilitating the delivery of the initial phase of the Hoobrook Link Road. There is no justification as to why a phasing approach is necessary, particularly given that the majority of sites are brownfield and therefore should not be prevented from coming forward.</p> <p>Such sites often difficult to develop and take longer to come forward. In light of this they should be encouraged to commence early in the plan period in order to ensure that they are completed within the plan period. If, however, they are phased later on they may not be delivered before 2026 and could result in a failure to achieve the Core Strategy housing requirement of 4,000 dwellings over the plan period up to 2026. It is therefore recommended that the Council reconsiders this policy approach.</p> <p>Notwithstanding this point it is considered that the former British Sugar site can come forward sooner than 2016. A planning application is currently in the process of being prepared. It is anticipated that the outline planning application for Phase 1 (of 2 Phases) will be submitted in the autumn of 2011</p>	<p>Noted. The phasing strategy is indicative and was included to inform the housing trajectory. It is not proposed that this would seek to stifle development should sites come forward before the date identified within the document. In terms of the British Sugar site, it is anticipated that the development of this would be 'phased' anyway and so would be developed out over a longer period of time.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>Should the Council maintain a phasing policy approach (although it is recommended that it should be removed) the suggested phasing for the former British Sugar site should be revised to allow the site to come forward as soon as practically possible. It is considered that the development of this site will not prejudice other policy objectives. It will, conversely, assist to deliver policy objectives of the Core Strategy, including delivering regeneration, providing a range of high quality market and affordable housing, growing the District's economy and delivering much needed infrastructure, and should accordingly be encouraged.</p>	
St Francis Group	SALPO223	Paragraph 4.8	<p>An additional issue is that it is unclear what is meant by the reference "suggested phasing". It could be interpreted as meaning, planning permission should not be granted until 2016, or alternatively, planning permission can be granted earlier, however, dwellings should not be delivered until 2016. For the reasons given above, such an approach to housing delivery is perverse and should be removed.</p> <p>It is noted that the suggested phasing is set out in five year periods, which implies the information has been taken from the Strategic Housing Land Availability Assessment (SHLAA). Timescales within the SHLAA are indicative based upon the information available when preparing the evidence base document. Should the Council wish to maintain references to indicative timescales for delivery within the Site Allocations and Policies document, they should be referred to as such "indicative timescales". Although, there would be a concern that this information could become out of date</p>	<p>Noted. The phasing strategy ("suggested phasing") is indicative and was included to inform the housing trajectory. It is not proposed that this would seek to stifle development should sites come forward before the date identified within the document. In terms of the British Sugar site, it is anticipated that the development of this would be 'phased' anyway and so would be developed out over a longer period of time.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			very quickly and therefore it is best left within the SHLAA which is regularly updated based upon the latest information at the time of preparation.	
WCC - Transport Policy & Strategy	SALPO86	Paragraph 4.8	WCC awaits instruction to proceed on the assessment of these sites in terms of journey times and distance assessments to local services and facilities.	Comments are noted.
Mellor Mrs F	SALPO119	Paragraph 4.8	<p>Proposed 37 dwellings.</p> <p>The Parish Council's Housing Needs Survey identified a need for just 17 affordable housing units.</p> <p>Development of 37 dwellings would have a detrimental impact on Blakedown, including</p> <ul style="list-style-type: none"> • increased traffic • access issues onto Belbroughton Road and increased volumes using Birmingham Road junction • affect on Forge Lane residents/access • loss of on street parking for Belbroughton Road residents • effect on Green Belt - intrusion into countryside, noise and light pollution • potential water run off into the Pools • effect on existing services (sewerage capacities, etc) • effect on Primary School intake • continued pressure on Haybridge School • disregard of Parish Plan • disregard of Housing Needs Survey • loss of ribbon development pattern • loss of amenity for neighbouring residents - 	Comments are noted. The site would need to deliver the level of affordable housing identified through the Parish Housing Needs Survey. This site has been identified as the most suitable site for this purpose in conjunction with the Parish Council and has been earmarked for future housing needs through previous Adopted Local Plans. In order to deliver the affordable housing, it may be necessary to allow some enabling market housing to make the scheme financially viable.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			intrusion into gardens	
Moss K	SALPO149	Paragraph 4.8	Total number of units allocated for Bewdley and rural areas falls far short of 10% proposed under Policy DS01. Is too much emphasis on large settlements and further allocations should be identified in rural settlements to ensure that policies such as DS04, CP04, CP05 and CP07 can be achieved. Viability issues on high density brownfield sites in large settlements could prevent other sites coming forward.	Comments are noted. The figures in DS01 are indicative figures to support the housing trajectory. Consider extending the allocation at Clows Top whilst being mindful of cross-boundary issues and housing need.
Moss K	SALPO173	Paragraph 4.8	Consider that more sites should be allocated in rural areas to more closely reflect 10% split under DS01 - specifically Clows Top Garage to meet local housing need with necessary enabling development. 12 units at The Terrace are unlikely to be built as provision of off-site sewer is cost prohibitive. However, if the 2 sites were combined as per site with lapsed consent, then a drainage solution could be found subject to some enabling development.	Comments are noted. The figures in DS01 are indicative figures to support the housing trajectory. Consider extending the allocation at Clows Top whilst being mindful of cross-boundary issues and housing need.
Butler Mrs S	SALPO163	Paragraph 4.8	Proposed 37 dwellings. The Parish Council's Housing Needs Survey identified a need for just 17 affordable housing units. Development of 37 dwellings would have a detrimental impact on Blakedown, including <ul style="list-style-type: none"> • increased traffic • access issues onto Belbroughton Road and increased volumes using Birmingham Road junction • affect on Forge Lane residents/access • loss of on street parking for Belbroughton 	Comments are noted. The site would need to deliver the level of affordable housing identified through the Parish Housing Needs Survey. This site has been identified as the most suitable site for this purpose in conjunction with the Parish Council and has been earmarked for future housing needs through previous Adopted Local Plans. In order to deliver the affordable housing, it may be necessary to allow some enabling market housing to make the scheme financially viable.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>Road residents</p> <ul style="list-style-type: none"> • effect on Green Belt – intrusion into countryside, noise and light pollution • potential water run off into the Pools • effect on existing services (sewerage capacities, etc) • effect on Primary School intake • continued pressure on Haybridge School • disregard of Parish Plan • disregard of Housing Needs Survey • loss of ribbon development pattern • loss of amenity for neighbouring residents – intrusion into gardens 	
Northumberland House Surgery	SALPO3	Residential Land Allocations	Requests that the phasing period for Northumberland House Surgery and Aylmer Lodge Surgery be brought forward as both surgeries are due to relocate to the new development at the Kidderminster Hospital site in November 2012 meaning the sites will be available for development in 2012-2013.	Comments are noted however the phasing periods are indicative and were included in order to inform the housing trajectory.
Barratt Homes	SALPO309	Paragraph 4.9	Para. 4.9 acknowledges that rural areas may need to accommodate affordable housing on an exceptional circumstances basis. However, the Blakedown site is shown as an allocation and is an ADR so is not considered to fall into this category	Comments are noted. The Blakedown site would not be an exceptions site.
Moss K	SALPO180	Paragraph 4.11	Support proposal to seek allocations slightly above that required to meet figures set out in Core Strategy. However, level of development in rural areas seems much lower than would be expected. We believe that there are sustainable arguments to support the allocation of Clows Top Garage given the significant benefits that can be brought to the local community	Comments are noted. The figures in DS01 are indicative figures to support the housing trajectory. Consider extending the allocation at Clows Top whilst being mindful of cross-boundary issues and housing need.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			and the fact that the redevelopment of this previously consented site would appear to be essential to unlock the development potential of the adjacent site at The Terrace which it is proposed to allocate.	
Watkins R A	SALPO69	Policy 1 - Sites for Residential Development	The use of the terms 'brownfield sites' and PDL in Policy 1 and the Jargon Guide is confusing. Suggest use only PDL as defined in PPS3 which would allow for future changes in government definition without need to change your policy/ text.	Comments are noted. Consider removing reference to brownfield sites throughout document and replace with previously developed land (PDL) as defined 'in latest Government guidance'. Also consider similar amendment to KCAAP DPD.
West Mercia Police	SALPO226	Policy 1 - Sites for Residential Development	<p>Whilst we are supportive of land use strategy described in Policy 1, we are concerned that the bullet points do not reference the need to ensure that sites are supported by appropriate infrastructure as referenced for Policy 2 and CP07 of the Core Strategy. Request that following wording is added:</p> <p>Within sites and areas that either already offer good quality access to infrastructure and services, or where this can be provided in accordance with Policy CP07 of the Adopted Core Strategy'.</p>	Comments are noted however this issue is covered by CP07.
St Francis Group	SALPO224	Policy 1 - Sites for Residential Development	Policy 1 entitled "Sites for Residential Development" sets out locations within which residential development will only be allowed. It lists the locations from 1 to 5 which imply that there is a sequential approach to be followed, however, from reading the accompanying text this is not the case. If it were intended, such a mechanism is not justified nor would it be consistent with national policy. To avoid any confusion or ambiguity, it is recommended that the numbered points are replaced with bullets.	Comments are noted. The policy should not be read as a sequential approach and therefore the Council will look to amend formatting of the policy. The sequential approach to site selection was included in Policy DS01 of the Core Strategy.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
West Mercia Police	SALPO234	Paragraph 4.13	<p>We are concerned that paragraph 4.13 appears to imply that by simply delivering mixed-use developments in town centres, with the objective of extending the range of hours of activity and increasing natural surveillance, will automatically make them a lot safer.</p> <p>Whilst increasing natural surveillance does help, we strongly emphasise that the solutions for delivering safer town centres involve implementing a comprehensive range of measures and delivering necessary supporting infrastructure. Refer to Policy EC4.2 of PPS4. Suggest Para.4.13 is amended as follows:</p> <p>'Promoting a mix of uses within the town centres increases the range of hours during which activity takes places within town centres, which alongside active management measures and supporting infrastructure, will make the District's town centres more vibrant and safer places . Mixed use developments can also create...'</p> <p>This will bring DPD more in line with Community Strategy also.</p>	Comments are noted. Re-word as suggested.
Watkins R A	SALPO70	Policy 2 - Rural Housing	I can not find a replacement for Adopted Local Plan Policy H9iii (replacement dwelling). This omission needs to be rectified.	Noted. Include a section on replacement dwellings in rural areas under Policy 2. Replacement dwellings in the Green Belt are covered under Policy 20.
West Mercia Police	SALPO227	Policy 2 - Rural Housing	Support Policy 2 but suggest that reference to Policy CP07 is added in.	Comments are noted and support is welcomed. However, it is not considered

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
				necessary to duplicate the Core Strategy.
Homes & Communities Agency	SALPO273	Policy 2 - Rural Housing	<p>Supports the inclusion of rural housing in the LDF process as this fits with the Local Investment Plan for Worcestershire.</p> <p>Encourages wider flexibility in the housing and tenure mix in rural areas which might encompass specialist housing provision to meet the wider residential needs within the District.</p>	Comments are noted and support is welcomed. The Core Strategy restricts development within the rural areas to affordable housing.
Barratt Homes	SALPO310	Policy 2 - Rural Housing	Policy 2 again refers to Rural Exception Sites. BWM considers Blakedown to be part of the Identified Sites in the Allocation process rather than falling within the Exception policy.	Comments are noted. The Blakedown site would be allocated and therefore not an exceptions site.
Moss K	SALPO181	Paragraph 4.24	We support the principle of identifying settlement boundaries but believe that the boundary for Clows Top should include the whole of Clows Top Garage including all of the previously developed land and associated areas subject of the established use as a transport yard and storage depot to encourage the development of this site.	Comments are noted. The figures in DS01 are indicative figures to support the housing trajectory. Consider extending the allocation at Clows Top whilst being mindful of cross-boundary issues and housing need.
Moss K	SALPO182	Paragraph 4.26	<p>We believe that the settlement boundary of Clows Top should be extended to include the area of the whole site currently in use as a Garage and Transport Yard in order to encourage development in accordance with the range of policies contained within the LDF Adopted Core Strategy.</p> <p>It should be noted that The South Worcestershire DPD is proposing a greenfield release in Clows Top to accommodate 25 units - this would not appear to</p>	Comments are noted. The figures in DS01 are indicative figures to support the housing trajectory. Consider extending the allocation at Clows Top whilst being mindful of cross-boundary issues and housing need.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			comply with government policy if a brownfield site is available.	
St Francis Group	SALPO225	Policy 3 - Financial Viability Policy	<p>Raises concern to the financial viability policy, arguing that policy CP04 of the Core Strategy states that a standard viability model would be prepared and what this policy presents is a standard viability methodology.</p> <p>Considers that the policy is onerous and raises specific objection to the element which requires the developer to pay the Council's costs arguing that these costs form part of the normal consideration of a planning application for which a fee is payable. Independent advice will already have been used to prepare the viability assessment and if the Council chooses not to accept this then the application fee is meant to cover this element.</p>	Comments are noted. The policy was developed in association with GVA Grimley who have prepared a report looking at recent policy and best practice in this area and have used this to develop the policy wording. the report states that "should an independent review of a viability assessment submitted at planning application stage be required by a Local Authority, the applicant (developer) will normally be required to pay for such a review, given that seeking to challenge Council policies in relation to affordable housing or other planning obligations.
Barratt Homes	SALPO311	Paragraph 4.29	In Para 4.29 there is reference to - "Affordable housing provision of 30% will be sought on sites of 6 units or more in Bewdley and rural areas ". It is assumed that this part of the policy will be applicable to the Blakedown site.	Yes. 30% affordable housing will be sought on the Blakedown site
Homes & Communities Agency	SALPO278	Policy 5 - Specialist Housing	The Agency supports the proposals identified within the policy, and would welcome the inclusion of acceptable locations within the policy.	Comments are noted and support is welcomed. Acceptable locations are governed by the Development Strategy and are identified through site specific policies in Part B.
McCarthy & Stone Retirement Lifestyles Ltd	SALPO323	Policy 5 - Specialist Housing	Happy with the Council's acknowledgement of the District's aging population and its support for specialist accommodation for the elderly, specifically policy	Comments are noted and support is welcomed. Consider making the first amendment suggested. Whilst specialist

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>CP05 of the Adopted Core Strategy.</p> <p>Recommends consistency and reiteration and reinforcement of the need for specialist accommodation for the elderly within the emerging LDF documents. Particularly supports policy 5 of the Site Allocations and Policies DPD Preferred Options and paragraph 4.39 of the reasoned justification.</p> <p>Despite support, we would advise the following:</p> <ul style="list-style-type: none"> • The Council expresses that it will support applications for "residential homes and extra care units" which intimates that other forms of specialist housing for the elderly would not be supported. Suggest re-wording to: "The District Council will support applications for specialist housing accommodation for the elderly where it is demonstrated that..." • Sub-clause B states that housing for the elderly will be supported where it is demonstrated "they will have minimal impact on adjacent occupiers, local character and the local highway network". This intimates that housing for the elderly has a higher environmental impact than other types of development when in fact housing for the elderly is considered to be a "good neighbour development". Considers this clause unnecessary and should be deleted. • Sub-clause c states that housing for the elderly will be supported where it is demonstrated "they have adequate amenity 	<p>housing is seen as good neighbour development, the buildings and their operation can have a detrimental impact on the residential amenity of neighbours. With reference to parking and amenity space, specialist housing covers a range of types of housing and occupiers and therefore, this will be considered on a case-by-case basis.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>space and sufficient parking provision for staff and visitors" which infers that higher levels of amenity space and parking space are required than for market housing which is not the case. Therefore, this clause is considered to be unnecessary. By its nature this type of development is usually located within walking distance of essential services, including public transport. Suggests one space per 3 units is sufficient given the nature of schemes. Whilst amenity greenspace is important the quantity required is less than market housing. The most important amenity spaces are the indoor spaces. Suggests that clause c is deleted and amenity space and parking issues are considered on a case-by-case basis. Should the Council maintain that these standards are still necessary, we would recommend setting a significantly lower level than market housing.</p>	
Watkins R A	SALPO71	Policy 6 - Accommodation for Dependants	Consider that proposed wording is too narrow. Annex extensions may be for either carers (often with family) or elderly dependants. Consider criteria too narrow and difficult to justify.	Comments are noted. These criteria are in place to allow the opportunity for extensions for dependant relatives but also to prevent new separate dwellings occurring where they would not normally be permitted.
Campaign to Protect Rural England	SALPO144	Policy 6 - Accommodation for Dependants	The policy should state that the use of a 'granny flat' as ancillary to a dwelling will normally be secured by a planning condition, to prevent 'creep' towards it becoming a separate dwelling	Comments are noted however, paragraph 4.41 is clear that accommodation should be provided by way of an annex and the policy includes safeguards to ensure that the accommodation could not become a separate dwelling.
Stourport on	SALPO169	Para 4.42-4.46	It is hoped that this will amount to no more than a	Comments are noted. The potential sites for

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Severn Town Council			holding objection, providing consultation with the Town Council by the District Council's consultants in accordance with paragraph 4.46 of the above Development Plan Document.	gypsies, travellers and travelling showpeople will be the subject of a separate consultation exercise later this year.
Campaign to Protect Rural England	SALPO148	Policy 7 - Providing Accommodation for Gypsies, Travellers and Travelling Showpeople	Travelling Showpeople have different needs to Gypsies and Travellers, such as secure winter storage for expensive equipment, and there should be a separate policy to cover their needs, perhaps by permitting the use of employment or residential land for this purpose. Recognises possible tensions between travellers and the settled community.	Comments are noted. These issues will be considered when allocating sites for gypsies, travellers and travelling showpeople. A separate consultation will be undertaken on potential sites later this year.
Environment Agency	SALPO255	Providing Accommodation for Gypsies, Travellers and Travelling Showpeople	We note the document states that new sites still need to be identified, which will be detailed within the publication DPD. We would refer to criteria 5 of policy CP06 in your adopted CS for selecting new sites, which states that new sites should not be located within Flood Zone 2 & 3 and should be informed by your Level 1 and 2 SFRA.	Comments are noted. Selection of sites will need to have regard to all relevant planning issues.
Derbyshire Gypsy Liaison Group	SALPO67	Paragraph 4.42	Welcome the approach of allocating sufficient sites to meet the needs of Gypsies, Travellers and Travelling Showpeople.	Support is noted and welcomed.
Derbyshire Gypsy Liaison Group	SALPO68	Policy 7 - Providing Accommodation for Gypsies, Travellers and Travelling Showpeople	Support the approach of safeguarding sites where these are appropriately located. Welcome clarity of approach in setting out that additional sites will be identified in the Publication document.	Support is noted and welcomed.
West Mercia	SALPO242	Paragraph 4.47 -	Welcome recognition that provision of community	Comments are noted and support is

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Police		4.49	<p>facilities are essential to quality of life of local residents but disappointed that there is no recognition that this also has positive impact on crime levels and community safety. Request that para. 4.48 is amended to read:</p> <p>The Sustainable Community Strategy and the Community Safety Partnership Plan support the provision of community facilities in order to promote community cohesion, reduce crime and disorder and enhance community well-being.</p>	welcomed. Re-word as suggested.
Campaign to Protect Rural England	SALPO152	Paragraph 4.49	<p>My only problem with this is that it is not clear beyond doubt that there is NO additional policy on this and that Policy 8 does not relate to this paragraph. Slight redrafting might be desirable to clarify this - possibly as little as a change in the levels of heading.</p>	Comments are noted. Consider revising the formatting.
Sport England	SALPO83	Policy 8 - Educational Sites	<p>Advises the following changes to the policy:</p> <p>Clause a) Do not form part of a playing field or sports pitch, or if they <i>meet one of the exceptions set in PPG17</i>.</p> <p>Clause c) Demonstrate that there is no longer a need for the land or buildings to meet educational requirements or wider community needs, <i>by advertising the buildings or land for a period of not less than 18 months in a scheme agreed by Wyre Forest DC;....</i></p>	Comments are noted. Consider that this is addressed in the policy as it stands. Suggested amendments to clause (c) could unnecessarily delay development and the provision of alternative off-site facilities.
Campaign to Protect Rural	SALPO157	Policy 8 - Educational Sites	<p>Policy is muddled. Clause c relates to redundant sites, others to those in continued educational use. Need to</p>	Comments are noted. Consider this further in developing the Publication document.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
England			separate out clauses to cover the 2 types of proposals in 2 separate policies. A different set of clauses should cover allocation of redundant sites for other non-educational uses.	
West Mercia Police	SALPO245	5 - A Good Place to do Business	<p>Surprised that paragraphs 5.1 - 5.15 do not make any substantive statements re infrastructure planning. Large employment developments can have significant impact on operation of emergency services.</p> <p>Planning for community safety and infrastructure provision must take place at the earliest possible opportunity. Would be helpful if following could be inserted into Policy 9:</p> <p>...The development of these sites will need to be in line with the specific assessment identified in Part B and deliver those requirements identified by the Infrastructure Delivery Plan.</p>	Comments are noted. Consider including a reference to infrastructure delivery as suggested.
St Francis Group	SALPO228	Policy 9 - Employment Land Allocations	<p>The former British Sugar site is identified within Policy 9 as an employment allocation. This is supported. In terms of the quantum of employment land, it is considered that approximately 12 hectares gross of employment generating uses can be delivered on site.</p> <p>Whilst this policy is supported, it should note that further testing of the specific allocation on the site (i.e. taking into consideration site constraints and necessary infrastructure) may result in a different figure than 12 ha gross.</p>	Comments are noted. Support is welcomed. This is a key employment site for the District and therefore the delivery of employment generating uses within this location is paramount.
Revelan Group	SALPO341	Policy 9 -	Identifies that policy 9 seeks to protect the former	Comments are noted. However, the site has

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
		Employment Land Allocations	<p>Romwire site for employment development although there is no reference within the policy as to what constitutes employment development.</p> <p>Refers to PPS4 and the fact that allocations should not automatically be carried forward from the Local Plan to the LDF unless there is "evidence of need" and "reasonable prospect of take-up" during the plan period.</p> <p>Identifies that the site has been marketed for a significant period and during this time, only three parties have expressed an interest, however, none of these have been realised. Countrywide are interested in operating from the site. The site should not be retained for B Class uses.</p>	<p>been identified within the Employment Land Review as being suitable for employment use. It is located within the main employment corridor for the District and also forms part of the Enterprise Zone bid.</p>
Homes & Communities Agency	SALPO282	Policy 9 - Employment Land Allocations	<p>The HCA recognises the importance of the emerging Worcestershire Economic Development and Regeneration Strategy and that this will influence land allocations and the aspirations for the Local Enterprise Partnership. Recognises the on-going consultation in relation to the Lea Castle site and is keen to work with the Council to deliver this complex site.</p>	<p>Comments are noted and support is welcomed. The former Lea Castle Hospital site is considered in more detail in policy 56: Major Developed Sites in the Green Belt.</p>
Hovi Developments Ltd	SALPO107	Paragraph 5.15	<p>Existing employment sites provide flexibility for businesses- diversity of size, type and location. Rural sites help to sustain rural economy. Rushock Trading Estate is an historic established site in the Green Belt which was a former military site. Still not fully developed out so has potential to provide further employment with minimal impact on local amenity. Such sites should be safeguarded for employment</p>	<p>Comments are noted. The site is safeguarded for employment uses.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			uses to provide certainty to occupiers. Their development should be encouraged.	
Campaign to Protect Rural England	SALPO160	Paragraph 5.21	Question whether 300m is too far a distance. Suggest 100m should be maximum. If there are cases where greater distance is appropriate, then this should be dealt with by specific wording. Perhaps problem is with use of term 'edge of centre'. Although Weavers Wharf is edge-of-centre, it is clearly part of town centre whereas Crossley and Green Street are not. Solution lies in detailed policies in KCAAP. This issue is unlikely to be relevant outside of Kidderminster.	Comments are noted. The 300m distance is part of the national definition of 'edge-of-centre' which is set out in PPS4.
Asda Stores Ltd	SALPO177	Policy 10 - Town Centre Retail	The impact test for edge and out-of-centre developments set out in paragraphs (b) and (c) requires a demonstration "... that there will be no adverse impact on the existing centre...". This wording lacks clarity and does not accord with the policy tests set out in PPS4. It should be amended to read "...that there will be no significant adverse impact on the overall vitality and viability of the existing centre...".	Comments are noted. Consider re-wording as suggested.
Shaylor Developments	SALPO89	Policy 10 - Town Centre Retail	Shaylor Development (Shaylor) would like to support the uses proposed by Policy 10 within the designated shopping frontages of centres, reflective of national guidance. The range of uses the Policy identifies as able to be supported within secondary frontages is reflective of the Council's policy approach to encouraging mixed use proposals and to accept non retail based uses into Town Centres as a means of attracting visitors and improving sustainability.	Comments are noted and support is welcomed.
Campaign to Protect Rural	SALPO183	Policy 10 - Town Centre Retail	Acceptable uses for secondary frontages (and primary frontage above the ground floor) should include	Comments are noted. Consider suggestions made in preparing the Publication version of

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
England			dentists' and other health professionals' surgeries or consulting rooms (though perhaps not doctors'). This should also be an additional 'town centre use' for secondary areas, additional to those identified in PPS4.	the Document.
West Mercia Police	SALPO246	Policy 10 - Town Centre Retail	Welcome and support policy 10 and para. 5.33. This will help to resolve following issues: need to reduce crime, need to reduce alcohol and drug misuse.	Comments are noted and support is welcomed.
Shaylor Developments	SALPO90	Paragraph 5.30	<p>Object to the inclusion of paragraph 5.30 in the supporting text which seeks the protection of retail units within designated frontages. Taking into account the advice of PPS4: Planning for Sustainable Economic Growth advises at paragraph EC1.4 for councils to " set flexible policies for their centres which are able to respond to changing economic circumstances" , RPS would contend that applying such a regimented approach to assessing the opportunities and impact of economic proposals within defined frontages will not encourage sustainable economic development. This is especially true for the secondary shopping frontages and any areas centres experiencing difficulties. Indeed PPS4 requires that " policies that make clear which uses will be permitted in such locations" [defined frontages] but does not encourage over restriction of development opportunities. Indeed paragraph 5.30 is considered to directly contradict and restrict the proposals of paragraph 5.31 in relation to encouraging mixed use developments.</p> <p>Therefore RPS would advise that the current inclusion</p>	<p>Noted. The Council consider that the inclusion of a policy to prevent fragmentation of the Primary Shopping Frontage conforms with national policy in so much that it "makes clear which uses will be permitted in such locations". The test refers specifically to the Primary Shopping Frontage which the Council wish to see retained primarily for A1 Retail use. The proposed policy shift for the secondary shopping frontages provides a much more flexible approach in areas of the town that are considered to be more peripheral to the primary retail function and provide the opportunity to consider more diverse uses. Within these areas clusters of similar service and office uses are already evident and appear to complement the Primary Shopping Frontage well. The policy to allow much greater flexibility within these areas, whilst allowing A1 retail uses to dominate within the Primary Shopping Frontage would appear to support the theme</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>of the criteria in paragraph 5.30 is unsound, not reflective of national guidance or the other AAP policies to support mixed use development. Instead these criteria should be amended to refer to the Council's priority to avoid the loss of A1 retail uses but that clusters of similar service, office or residential uses are compatible but dependant upon the localised factors. Such an amendment would support the theme of national guidance in PPS4 to generate areas of specific uses and services within centres, whilst also allowing the A1 retail use to dominate.</p>	<p>of national guidance in PPS4.</p> <p>This approach is not considered to be overly restrictive and is considered to be a sound approach to future retailing within the District.</p>
<p>Campaign to Protect Rural England</p>	<p>SALPO184</p>	<p>Policy 11 - Protecting and Enhancing Local Retail Services</p>	<p>Policy 11 should also encourage the clustering of other non-residential uses in village centres, including doctors', dentists', and other health professionals' surgeries or consulting rooms. This perhaps applies less to doctors' surgeries than those of other health professionals.</p>	<p>Comments are noted however it is considered that this would be overly restrictive.</p>
<p>Sainsbury's</p>	<p>SALPO213</p>	<p>Policy 11 - Protecting and Enhancing Local Retail Services</p>	<p>Para. 5.35 - local and neighbourhood centres should be identified on plans and listed in appendix. Suggest current sites are appraised and new ones defined - we would wish to comment on this once this work is done.</p> <p>Policy 11 - Support objective to support new local retail proposals in suitable locations. However, paragraph two should be reworded to make it clear that this support extends to retail and other uses (which should be defined) in local or neighbourhood centres (as defined).</p> <p>Policy 11 - Paragraph 3 needs to make it clear that the 'identified areas' refer to local and neighbourhood</p>	<p>Comments are noted. The local centres will be identified on the Proposals Map.</p> <p>For Policy 11, seek to include suggested changes which have been identified to make this policy clearer. However, it is proposed to retain clause (d) due to the importance of safeguarding the vitality and viability of existing centres.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			centres, and that a criteria-based approach will apply to proposals outside these areas. Policy11 - Criteria a should be deleted - is contrary to PPS4. Criteria d should also be deleted - is only require for proposals over 2,500 sq m in PPS4.	
Watkins R A	SALPO72	Policy 12 - Specialist Retailing	Adopted Local Plan Policy E2 allows car showrooms and vehicle maintenance etc. to be on Class B land. The draft Policy 12 does not give this flexibility and it should.	Noted. However, such uses on employment sites are covered by Policy CP08 of the Adopted Core Strategy
English Heritage	SALPO326	Market Towns	We welcome and support the recognition given to the historic environment as a key consideration for the market towns of Bewdley and Stourport-on-Severn.	Support is noted and welcomed.
Natural England	SALPO38	Paragraph 5.57	Sustainable Tourism We welcome the recognition of the need to protect the natural and historic assets upon which tourism is based.	Support is noted and welcomed.
Natural England	SALPO39	Policy 13 – Supporting Major Tourist Attractions	Natural England supports the protection afforded to Wyre Forest by the sentence "proposals will need to ensure that they respect the landscape, biodiversity and setting of this ancient woodland and proposals that cause adverse impact on the area will not be permitted". We also welcome the reference to the Grow with Wyre project (paragraph 5.70). Regarding the West Midland's Safari Park, the park includes some areas of heathland which adjoin the Devil's Spittleful SSSI. We would welcome the enhancement of this area, and we recommend that opportunities to achieve are explored. Perhaps there	Support is welcomed and noted. Consider making specific reference to the Devil's Spittleful SSSI within the policy or reasoned justification.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			is scope to introduce a heathland exhibit/educational corner.	
Worcestershire Wildlife Trust	SALPO125	Policy 13 – Supporting Major Tourist Attractions	<p>The Trust is pleased to support this policy and in particular comments in relation to the Wyre Forest regarding the fact that <i>‘ Proposals will need to ensure that they respect the landscape, biodiversity and setting of this ancient woodland and proposals that cause adverse impact on the area will not be permitted’ .</i></p> <p>We would however suggest a small amendment to the section pertaining to the Safari Park to reflect the fact that the Park has significant potential to contribute to heathland restoration and re-creation. Appropriate steps should be taken to facilitate this through any major planning application here.</p>	Comments are noted and support is welcomed. Consider including reference to the Safari Park's potential to contribute towards heathland restoration as suggested.
St Francis Group	SALPO229	Policy 13 – Supporting Major Tourist Attractions	Policy 13 refers to the Severn Valley Railway. This policy is supported, in particular in light of the proposals that are currently being prepared regarding the former British Sugar site, which may include a railway halt for the Severn Valley Railway.	Comments are noted and support is welcomed.
West Midlands Safari Park	SALPO301	Policy 13 – Supporting Major Tourist Attractions	<p>WMSP supports policy 13.</p> <p>Appropriate policies are needed to create a positive framework for the improvement of facilities at WMSP in order to boost the local economy.</p> <p>A Sustainable Masterplan / Planning Brief should be produced by owners in consultation with the Council and other stakeholders. Such a document could then</p>	Noted. Support for the policy approach is welcomed.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>form the basis on which planning applications will be considered to ensure that the site is developed in a comprehensive way.</p> <p>On this basis, and with the particular characteristics of WMSP considered, this general tourism policy for Wyre Forest District as a whole making specific mention of the WMSP as one of the most important tourist attractions within the region, is welcomed.</p>	
English Heritage	SALPO327	Policy 13 – Supporting Major Tourist Attractions	The Wyre Forest - recommend adding reference to historic environment of the ancient woodland. Heritage was key component of HLF funded landscape project.	Comments are noted. Add in a reference to the historic environment of the Wyre Forest as suggested.
West Midlands Safari Park	SALPO302	Paragraph 5.65	<p>WMSP is broadly supportive of the relevant text accompanying policy 13, but objects to it in its current form.</p> <p>Current text clearly recognises WMSP's contribution to local and regional economy, and is consistent with PPS4: Planning for Sustainable Economic Growth which states that local planning authorities should ensure that their development plans support "existing business sectors, taking account of whether they are expanding or contracting" (policy EC2.1(b)), and "sustainable rural tourism and leisure developments that benefit rural business, communities and visitors".</p> <p>Accompanying Ministerial Statement to 2011 Budget, 'Planning for Growth' (23 March 2011) announced that local planning authorities should ensure that they give appropriate weight to the need</p>	Noted. The reasoned justification will need to be amended to take into account any changes in national planning policy, where appropriate. However, it is considered that the current wording already provides a flexible and positive approach to consider future development proposals at the Safari Park by recognising its role as an important tourism destination whilst also identifying the important economic role it plays. Further reference can be made to the Amion Report but it is considered that the suggested additional wording, as currently drafted, is inappropriate to include within the Site Allocations document.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>to support economic recovery and that applications that secure sustainable growth are treated favourably provided they are consistent with PPS4.</p> <p>This has more recently (15 June 2011) been backed up by details of the Government's proposed presumption in favour of sustainable development. "Local planning authorities should plan positively for new development, and approve all individual proposals wherever possible"</p> <p>An Economic Impact Study (February 2011) of proposals to develop a national attraction at the WMSMP concluded that there was the potential to generate significant net additional local jobs and economic activity.</p> <p>It is considered that the Ministerial statement and the conclusions of the Economic Impact Study provides justification for including the following wording in paragraph 5.65:</p> <p><i>"Due to higher expectations from consumers and competition from other forms of leisure spending, and higher running costs associated with wild animal attractions, WSMMP is operating in a difficult environment. Unless the Park can continue to introduce new attractions and complementary developments, the parks contribution to the local economy will be restricted."</i></p>	
WCC - Transport	SALPO84	Promoting	Considers section is well written and compliant with	Support is noted and welcomed. Consider

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Policy & Strategy		Transport Choice and Improving Accessibility	the latest policies. It will deliver a number of favourable outcomes, including reduced car use and an improved environment. May be worth adding some text on electric vehicle charging points to encourage more widespread use.	adding in text on electric vehicle charging points in the Publication version.
Centro- WMPTA	SALPO345	Promoting Transport Choice and Improving Accessibility	<p>Centro considers that it is important that the plan is consistent with national policy guidance as well as with the West Midlands Local Transport Plan (2011-2026).</p> <p>These plans fall within the West Midlands 'journey to work' area and it is therefore important that residents of any new development can have sustainable access to regional services and wider employment and education opportunities. Centro therefore recommends that cross boundary issues and travel should be given further consideration in these documents and are happy to assist and provide information where required.</p>	Noted. Consider additional wording in the Site Allocations and Policies to highlight the importance of the rail links to the West Midlands and the services it provides residents of Wyre Forest.
Centro- WMPTA	SALPO346	Promoting Transport Choice and Improving Accessibility	<p>Generally, Centro considers that development and redevelopment proposals make the use of existing transport infrastructure and services, improve connectivity locally and in the wider area where appropriate and provide high levels of accessibility for all with an emphasis on sustainable modes of travel.</p> <p>Centro recommends that these documents should encourage developments to be focused in areas already served by public transport and be designed to ensure access to it along with walk and cycling routes.</p>	Noted. The policies contained within the Site Allocations and Policies seek to promote the development of a good pedestrian and cycle network as well as public transport facilities and access to them.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Centro- WMPTA	SALPO347	Promoting Transport Choice and Improving Accessibility	Welcomes the section and sustainable transport and particularly the importance of rail, bus routes, cycling and pedestrians. Policy 14 would benefit from greater emphasis on cross-boundary issues and travel opportunities to ensure that residents have access to regional services and facilities.	Comments are noted. Consider including text on cross-boundary transport issues within Publication document.
Centro- WMPTA	SALPO348	Promoting Transport Choice and Improving Accessibility	Centro also stresses that a high quality integrated transport network can assist in sustainable economic growth, job creation and regeneration, while reducing carbon emissions. It is essential to invest in quality integrated transport facilities and services from the outset to encourage use of more sustainable modes.	Comments are noted.
Barratt Homes	SALPO313	Paragraph 6.1	In terms of Promoting Transport Choice, a Residential Travel Plan will be produced to accompany any planning application which will encourage use by public transport, walking and cycling. The site's location is well suited to this concept in terms of existing public transport facilities within Blakedown.	Comments are noted
Natural England	SALPO40	Policy 14 - Sustainable Transport	Natural England broadly supports this policy. We would welcome reference to green infrastructure within the policy. Off-road walking and cycling networks can form an important element of local green infrastructure and, in addition, may be perceived as being safer and more attractive than roadside paths.	Support is noted and welcomed. Include a cross reference to green infrastructure within the policy or the reasoned justification.
Worcestershire Wildlife Trust	SALPO127	Policy 14 - Sustainable Transport	The Trust is pleased to support the intent of this policy and the commentary regarding the need to safeguard and enhance more sustainable means of transport. We would however like to see the policy strengthened	Comments are noted and support is welcomed. Include a link to wider green infrastructure as suggested.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>with a link to wider Green Infrastructure, which appears to us to be a sensible way to ensure later integration of transport links into wider site design, landscaping etc.</p>	
<p>West Midlands Safari Park</p>	<p>SALPO303</p>	<p>Policy 14 - Sustainable Transport</p>	<p>WMSP is broadly supportive of policy 14, but objects to it as currently worded.</p> <p>Paragraph 6.5 refers to the Severn Valley Railway as "...one of the major tourist attractions within the area..." The potential exists to open up the line for commercial rail services. RPS on behalf of WMSP considers that the potential exists to develop a halt along the line to link the two attractions and allow visitors to the Park to arrive by rail. Precise details would be developed through an agreed Planning Brief and Masterplan.</p> <p>With reference to the statement in paragraph 6.3, which points out the requirement that development should "...reduce the need to travel by private car", it is considered that the following sentence should be added at the end of Policy 14: <i>"Proposals which seek to facilitate and encourage the use of modes of transport other than the private car, including rail, will be supported, subject to compliance with other policies of this DPD and other development plan policies".</i></p>	<p>Noted and agree. The potential to incorporate rail facilities at the WMSP and potentially link the District's two largest tourist attractions is something that should be explored. Agree that the detail of any development would require further consideration taking into account other relevant planning policy considerations. Look to re-word the policy to incorporate comments.</p>
<p>West Mercia Police</p>	<p>SALPO248</p>	<p>Paragraph 6.8</p>	<p>Endorse paragraph 6.9 but suggest additional text: 'Cycle parking must conform to the requirements of the Worcestershire County Highways Design Guide and Policy 25'</p>	<p>Comments are noted and support is welcomed. Re-word as suggested.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
West Mercia Police	SALPO250	Paragraph 6.13	<p>Welcome and support para. 6.13. Also suggest wording is inserted to link with Policy 25 which requires new development to comply with Secured by Design: -</p> <p>'Natural surveillance is a key aspect of encouraging walking. Routes must be overlooked in order to help create a safe pedestrian environment. Therefore, pedestrian routes which are not overlooked and contrary to Policy 25 will not be considered to create safe'</p>	Comments are noted and support is welcomed. Consider re-wording as suggested.
WCC - Transport Policy & Strategy	SALPO85	Paragraph 6.15	<p>Welcomes the proposal to seek parking facilities east of the River Severn in Bewdley during the plan period. WCC is keen to work with WFDC on this as there is significant potential to reduce visitor traffic in the historic town centre. Identifies 3 possible sites:</p> <ul style="list-style-type: none"> • Caravan park off Northwood Lane • Land adjacent to the roundabout/junction of the A456/B4190, possibly as a small park and ride using existing bus services. • Land adjacent to the B4195 (near Netherton Lane) - possibly a small park and ride using existing bus services. 	Comments are noted and support is welcomed. Consider the suggested sites further during the development of the Publication document to see if any are suitable for allocation.
Natural England	SALPO41	Policy 16 - Major Transport Infrastructure	Natural England has significant concerns regarding the proposed Hoobrook Link Road and the potential impacts it could have on Wilden Marsh and Meadows SSSI. We would look to have early involvement in discussions and in the decision-making process.	Concerns are noted. Natural England will be invited to take part in discussions from an early stage in the process.
Worcestershire Wildlife Trust	SALPO128	Policy 16 - Major Transport	The Trust has serious concerns about the likely impact of the Hoobrook Link Road on the adjacent	Comments are noted. Involve the Trust in discussions regarding the Hoobrook Link

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
		Infrastructure	Wilden Marsh and Meadows SSSI and our Wilden Marsh Nature Reserve. Significant measures must be put in place to avoid or mitigate for harm caused by any new road here and we would be pleased to engage in discussions concerning routing, design and landscaping as early as possible in any development proposal.	Road from an early stage.
St Francis Group	SALPO230	Policy 16 - Major Transport Infrastructure	<p>Policy 16 refers to the safeguarding of the Hoobrook and Stourport Relief Road. It sets out that development along or adjacent should not prejudice the delivery and where practical will be expected to contribute towards delivery. Since the Site Allocations and Policies document was published in May 2011 and with the benefit of land ownership information, further work has taken place identify a suitable route for the relief road to pass through the site. In light of this, the Masterplan for the former British Sugar site has been revised accordingly.</p> <p>The mechanism for seeking contributions towards the implementation of the major transport infrastructure is unclear. Given that the Council has not yet put in place procedures to apply Community Infrastructure Levy, there is at present ambiguity as to how contributions would be sought. Further clarity is required in respect of this issue.</p>	<p>Noted. The line of the Hoobrook Link Road is still open for discussion. The key message is that a suitable route for the relief road is identified through the site. The actual line of the road will need to be agreed based on the best available evidence.</p> <p>Further work is required in identifying the contributions that will be required. This will be discussed further with the agents and owners of the site.</p>
Environment Agency	SALPO258	Policy 16 - Major Transport Infrastructure	In terms of planning road links, these must be carefully located and engineered, with consideration of the hydrogeological setting and in ensuring no adverse impacts on flood risk. The surface water drainage adopted needs to be appropriate.	Noted. Any scheme design would need to be agreed through a planning application where details such as these would be picked up.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
St Francis Group	SALPO231	Paragraph 6.24	Firstly, in terms of freight, it is suggested within paragraph 6.24 that there is potential for rail freight connection to the Severn Valley heritage line which was once used for rail freight. It is important though to note that there is no evidence to justify that this proposal is practical or viable. This issue has been considered in discussion between St Francis Group and Severn Valley Railway. It was concluded that whilst a link to the former British Sugar site is possible, it is not practical for rail freight for a number of reasons.	Noted. This was included within the document to understand if potential existed to include freight movement along the line of the railway. If this is not a viable solution then it would not be enforced.
St Francis Group	SALPO232	Paragraph 6.24	No sidings existing on site and therefore sidings of a significant scale would need to be constructed to accommodate modern rail freight. In addition, other infrastructure such as the existing viaduct, which is adequate for passenger travel, would need to be assessed and potentially upgraded at significant expense. When all matters considered together, it is concluded in agreement with Severn Valley Railway that a rail freight connection at the British Sugar site is not a feasible, practical or viable option.	Noted. This was included within the document to understand if potential existed to include freight movement along the line of the railway. If this is not a viable solution then it would not be enforced.
English Heritage	SALPO330	Delivering Sustainable Development Standards	Suggests that smaller scale measures should also be included as well as measures relating to energy efficiency and adaptation which for historic buildings require careful and appropriate consideration. Refers to guidance available at www.climatechangeandyourhome.org.uk . Could be included here or within the heritage section.	Comments are noted. Policy CP01 of the Adopted Core Strategy includes information on smaller scale renewable energy and energy efficiency. Consider including specific detail for historic buildings within the Site Allocations and Policies as suggested.
Environment Agency	SALPO256	Delivering Sustainable Development	Requests further clarity over how the locally tailored sustainability checklist will be delivered. Will this be an SPD or a DPD? Refers to Shropshire Council as	Comments are noted. The locally tailored Sustainability Checklist will be produced following the adoption of the Site Allocations

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
		Standards	an example of an SPD.	and Policies and Kidderminster Central Area Action Plan DPDs.
Environment Agency	SALPO257	Delivering Sustainable Development Standards	Note that this section refers to renewable energy only. Acknowledge that there is a water efficiency target within CP01 of the Adopted Core Strategy. Policy CP01 also refers to the investigation of more stringent targets as part of this DPD and we would seek clarification as to whether this has been investigated.	Comments are noted. The Adopted Core Strategy sets out specific targets in relation to water consumption. In the current economic climate it is considered that setting more stringent targets would be over-onerous.
Natural England	SALPO42	Policy 18 - Renewable Energy	<p>Natural England supports the general thrust of this policy. We would welcome more positive/encouraging wording and increased local distinctiveness, e.g. the potential for biomass from the Wyre Forest. We welcome the references to the county's Landscape Character Assessment and the need to consider impacts on biodiversity and geology (paragraph 6.31).</p> <p>Paragraph 3.2.2 of the SA provides the aims of the SAP DPD, one of which is to "Identify sites which are suitable for renewable energy development and identify whether higher renewable energy targets could be set for individual development sites". This aim hasn't been achieved.</p>	<p>Support is noted and welcomed.</p> <p>Consideration will be given to amending the policy to make it more locally specific at Publication stage.</p> <p>With reference to paragraph 3.2.2 of the SA report, paragraph 6.27 of the Site Allocations and Policies DPD Preferred Options Paper sets out why it was not considered appropriate to allocate specific sites for renewable energy development. Additionally, it was not considered financially viable to identify particular sites to deliver higher levels of renewable energy provision.</p>
Sport England	SALPO82	Policy 18 - Renewable Energy	Raises concern about the negative impact of wind turbines on sport, particularly sailing. Highlights research being carried out by the University of Warwick looking at the effect of wind turbines on playing pitches. Suggests that wind turbines are not	Comments are noted. This will be considered on a case-by-case basis through the Development Management process.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			located adjacent to playing fields or sailing clubs unless it is demonstrated that there is no negative impact.	
English Heritage	SALPO328	Policy 18 - Renewable Energy	In relation to Policy 18, the supporting text should also refer to the historic environment in determining applications in addition to potential impacts on biodiversity, geodiversity and landscape. This is relevant to accord with PPS5 and Policy HE1.	Comments are noted. Include additional information to address this issue within the Publication document.
Worcestershire Wildlife Trust	SALPO131	Paragraph 6.31	We are pleased to support the strong commentary provided by this paragraph and in particular the weight given to the need to consider impacts on biodiversity as part of the decision-making process. A line to reflect this guidance could be inserted in Policy 18 for the avoidance of doubt, perhaps as a bullet point (iv) in the second section.	Comments are noted and support is welcomed. Consider including a reference to biodiversity and geodiversity in the policy is not necessary as this is a key part of the LDF and is covered by CP01.
Environment Agency	SALPO259	Paragraph 6.32	<p>Whilst we would accept that a flood risk policy is not necessary for this document, this would be on the basis that a flood risk policy is included within the Kidderminster Central Area Action Plan (KCAAP), given the flood risk to the town centre and its relationship with the upstream Flood Alleviation Scheme (FAS).</p> <p>Sequential testing needs to be completed to inform the evidence base for the site allocations (see comments above on the evidence base).</p>	Comments are noted. Look to enhance policy in KCAAP.
Environment Agency	SALPO262	Paragraph 6.32	The River Basin Management Plan (RBMP) for the Severn River Basin District was published in December 2009. The RBMP is the central tool for setting out the objectives and actions required to	Comments are noted. It is considered that the policies contained within the Adopted Core Strategy (CP01, CP02 & CP15) and the proposed site allocations within this

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>achieve the WFD objectives. The plan states the environmental objectives for the river basin district, where different objectives to good ecological status have been selected (because of necessary timescales for improvement, availability of improvement techniques or it is disproportionately costly to go further), and summarises the actions needed to deliver the objectives.</p> <p>Planning authorities have a duty under the WFD to take account of the RBMPs and can help deliver WFD objectives. Planning policies and activities can ensure that new development does not create adverse pressures on the water environment that could compromise our ability to meet WFD objectives. Failure to comply with WFD requirements may lead to the European Commission bringing legal proceedings against the UK</p>	<p>document will help to have a beneficial impact on the water environment within the District. It is considered that the policies contained within the LDF would not cause adverse impacts or fail to comply with WFD requirements.</p>
Natural England	SALPO43	Policy 19 - Implementation of SUDS	Natural England supports this policy. We would welcome the design of SUDS to contribute towards re-wetting drying out SSSI wetlands in the District, where opportunities arose.	<p>Support is noted and welcomed.</p> <p>Consider including a reference to the re-wetting of drying out wetlands within either the SUDS or Green Infrastructure policies or their reasoned justifications at Publication stage.</p>
Worcestershire Wildlife Trust	SALPO134	Policy 19 - Implementation of SUDS	The Trust is pleased to support this policy and in particular sub-section b).	Support is welcomed.
Campaign to Protect Rural	SALPO185	Policy 19 - Implementation of	typo - should 'effect' not 'affect'	Comments are noted. Amend as suggested.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
England		SUDS		
St Francis Group	SALPO233	Policy 19 - Implementation of SUDS	It is considered that the policy does not add to the existing policy requirement (CP02), particularly given that the SUDS Approving Body is yet to be established. In addition, the incorporation of SUDS techniques is referred to in Policy 26 in respect of landscaping and boundary treatment, therefore policy 19 is superfluous.	Noted. However, this policy references new legislation that has occurred since the adoption of the Core Strategy and its inclusion is supported by the EA and the Council's Watercourse officer. It is considered it adds greater detail to CP02 and will ensure SuDS are considered in line with The Flood and Water Management Act of 2010.
English Heritage	SALPO329	Policy 19 - Implementation of SUDS	Raises concern over the implementation if SUDS having potentially damaging implications for heritage assets particularly archaeological remains and possibly sensitive townscape areas. Suggests that point (b) refers to the importance of any schemes also integrating with the existing valued feature/assets of the site.	Comments are noted. Consider that this would be addressed through LDF policies on heritage and design.
Environment Agency	SALPO260	Policy 19 - Implementation of SUDS	Part b - We would recommend that this part of the policy also refers to maintaining and improving water quality, with a reference within the reasoned justification to the Water Framework Directive (WFD). The wording could also be made stronger in requiring developers to incorporate SuDS (Sustainable Drainage Systems) with a multi-functional use. For example, part b of policy 19 could be re-worded: <i>'SuDS must be sensitively designed and located to: mitigate for flood risk; promote improved biodiversity and water quality; and provide for enhanced...'</i> . In addition, paragraph 6.35 could be changed to <i>'developers must demonstrate how SuDS have been sensitively designed and located to provide a multi-</i>	Comments are noted. Consider re-wording as suggested.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<i>functional use, in addressing policy 19. Appropriate justification must be provided in circumstances when this is not considered achievable'. You may want to include an explanation of SuDS with multi-functional use or reference to direct developers to.</i>	
Environment Agency	SALPO261	Policy 19 - Implementation of SUDS	It should be noted that infiltration SuDS should only be adopted where the ground conditions are shown to be appropriate (i.e. adequate permeability and absence of ground contamination). In areas where they are not suitable above ground SuDS techniques/lined systems should be considered, which can provide a number of 'multi-functional' benefits including: managing flood risk; biodiversity enhancements; improvements to water quality, meeting WFD objectives (see below); and amenity space.	Comments are noted. The multi-functional use of SUDS is identified within the Core Strategy but could also be further referenced here.
Barratt Homes	SALPO315	Policy 19 - Implementation of SUDS	It is intended to incorporate SUDS which will assist water supplies to adjoining pools system which have suffered from low water levels	SUDS are required in all new development under Policy CP02 of the Adopted Core Strategy
WCC - Environmental Policy & Strategic Planning	SALPO331	7 - A Unique Place	In principle we welcome the recognition of the importance of green infrastructure, landscape character. Not with standing this we would welcome greater reference to the cross cutting nature of these policies e.g. the influence of landscape character on local distinctiveness.	Comments are noted and support is welcomed. Consider how the cross-cutting nature of green infrastructure and landscape character can be clarified within the Publication document.
Core11	SALPO14	Safeguarding the Green Belt	We object to the list as shown. Add to the list the possible uses of Green Belt as shown in the Core Strategy.	The list referred to is a summary of the representations received relating to this topic during the Issues and Options consultation and as such can not be amended as suggested. The list provides information only and will not be included within the

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
				Publication document.
Core11	SALPO36	Safeguarding the Green Belt	Summary of issues and options responses to 'safeguarding the Green Belt' raises following: development does not recognise that green infrastructure development is different from building development. Suggest that green infrastructure developments are identified as a stand alone development type (GID). This would allow green infrastructure projects to proceed.	Comments are noted. Green infrastructure development is supported through Policy 22: Providing a Green Infrastructure Network. The list referred to is a summary of the representations received relating to this topic during the Issues and Options consultation and as such can not be amended as suggested. The list provides information only and will not be included within the Publication document.
Core11	SALPO15	Safeguarding the Green Belt	Add to list CP07; CP13; CP14	CP07 not considered to be specifically relevant to the Green Belt policy as it relates to developer contributions and development within the Green Belt will be limited to where very special circumstances can be demonstrated. Include CP13 and CP14 within the Relevant Adopted Core Strategy policies box.
Core11	SALPO16	Paragraph 7.1	Part 7.1 noted in conjunction with Core Strategy issues and agree.	Support is noted and welcomed.
Core11	SALPO17	Paragraph 7.2	Policy 20 criteria b recognises that green Belt may be used for recreation	Comments are noted.
Core11	SALPO18	Policy 20 - Green Belt	Note importance of outdoor recreation	Comments are noted.
Watkins R A	SALPO73	Policy 20 - Green Belt	'Original' dwelling needs defining. Will there be any flexibility? Will similar policy affect extensions outside Green Belt?	Consider including a definition of 'original dwelling' which would be the dwelling as it was first built, excluding any extensions and

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
				alterations which have taken place since. The policy applies only to extensions within the Green Belt. Extensions outside of the Green Belt should demonstrate that they meet the criteria set within Policy 25 - Design Quality and Local Distinctiveness and within the Design Quality SPG.
Worcestershire Wildlife Trust	SALPO135	Policy 20 - Green Belt	The Trust is pleased to support this policy	Support is welcomed.
Hovi Developments Ltd	SALPO108	Policy 20 - Green Belt	Paragraph 'e' is welcomed in order to protect and enhance existing Major Developed Sites within the Green Belt including Rushock Trading Estate.	Support is welcomed.
Campaign to Protect Rural England	SALPO186	Policy 20 - Green Belt	The distinction between the first two paragraphs grammatically seems slight. Should the second paragraph not be item f of the first one?	Comments are noted. Amend as suggested.
Core11	SALPO19	Paragraph 7.7	Major Developed Sites may be vital to CP13 - Providing a Green Infrastructure Network.	Comments are noted.
Mellor P	SALPO5	Paragraph 7.12	<ul style="list-style-type: none"> • The level of antisocial behaviour is at risk of being overstated. • It is acknowledged that the site will one day come forward for redevelopment. • Development should be sensitive to its surroundings and meet the needs of Blakedown's residents. • Belbroughton Road has a classic ribbon development pattern with defined buildings lines to the front and rear. • Any redevelopment should respect this to safeguard the amenity of nearby residents and 	Comments are noted. The site would need to deliver the level of affordable housing identified through the Parish Housing Needs Survey. This site has been identified as the most suitable site for this purpose in conjunction with the Parish Council and has been earmarked for future housing needs through previous Adopted Local Plans. In order to deliver the affordable housing, the remainder of the site will need to provide the enabling market housing to make the scheme financially viable.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>the adjoining Green Belt - while the site is derelict it is well screened by existing vegetation to the rear and sides.</p> <ul style="list-style-type: none"> • The statement regarding local housing need and the Housing Needs Survey (17 units required) conflicts with paragraph 4.8 which identifies 37 housing units on the site. • Please identify which other sites have been dismissed as unsuitable for such development. 	
Mellor Mrs F	SALPO120	Paragraph 7.12	<p>The level of antisocial behaviour is at risk of being overstated.</p> <p>However it is acknowledged that the site will one day come forward for redevelopment.</p> <p>However this should be sensitive to its surroundings and meet the needs of Blakedown's residents.</p> <p>Belbroughton Road has a classic ribbon development pattern with defined buildings lines to the front and rear.</p> <p>Any redevelopment should respect this to safeguard the amenity of nearby residents and the adjoining Green Belt - while the site is derelict it is well screened by existing vegetation to the rear and sides.</p> <p>The statement regarding local housing need and the Housing Needs Survey (17 units required) conflicts with paragraph 4.8 which identifies 37 housing units</p>	<p>Comments are noted. The site would need to deliver the level of affordable housing identified through the Parish Housing Needs Survey. This site has been identified as the most suitable site for this purpose in conjunction with the Parish Council and has been earmarked for future housing needs through previous Adopted Local Plans. In order to deliver the affordable housing, it may be necessary to allow some enabling market housing to make the scheme financially viable.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>on the site.</p> <p>Please identify which other sites have been dismissed as unsuitable for such development.</p>	
Meadows G	SALPO140	Paragraph 7.12	<p>Despite the 30MPH limit traffic currently speeds up and down Belbroughton Rd and requests for traffic calming/radar traps have been refused (on grounds of poor lighting/unsuitable radar trap siting). The proposed development will significantly increase the traffic problem. Will there be suitable plans to allow traffic calming and speed limit enforcement to be implemented?</p> <p>Can we be assured that the area outlined in red will be the strict limit of development and that there will not be any development creep into adjoining land?</p>	<p>Comments are noted. The area outlined in red is the Area of Development Restraint which is land taken out of the Green Belt to meet longer term housing need. Land beyond this is covered by the Green Belt designation and therefore will not come forward for development.</p>
Butler Mrs S	SALPO165	Paragraph 7.12	<p>The level of antisocial behaviour is overstated.</p> <p>It is acknowledged that the site will one day come forward for redevelopment.</p> <p>However this should be sensitive to its surroundings and meet the needs of Blakedown's residents.</p> <p>Belbroughton Road has a classic ribbon development pattern with defined buildings lines to the front and rear.</p> <p>Any redevelopment should respect this to safeguard the amenity of nearby residents and the adjoining</p>	<p>Comments are noted. The site would need to deliver the level of affordable housing identified through the Parish Housing Needs Survey. This site has been identified as the most suitable site for this purpose in conjunction with the Parish Council and has been earmarked for future housing needs through previous Adopted Local Plans. In order to deliver the affordable housing, it may be necessary to allow some enabling market housing to make the scheme financially viable.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>Green Belt - while the site is derelict it is well screen by existing vegetation to the rear and sides.</p> <p>The statement regarding local housing need and the Housing Needs Survey (17 units required) conflicts with paragraph 4.8 which identifies 37 housing units on the site.</p> <p>Please identify which other sites have been dismissed as unsuitable for such development and why.</p>	
Barratt Homes	SALPO316	Paragraph 7.12	Continued dereliction of Blakedown Nurseries still concerns local residents who seem to accept residential development as a suitable solution. Site is considered to be brownfield due to previous use and extent of buildings. Site is not covered by any statutory designations. Its allocation is therefore sound.	Comments are noted.
Natural England	SALPO48	Providing a Green Infrastructure Network	Suggests re-ordering the policy to present strategic considerations first. Suggested wording is included within the representation.	Consider re-ordering the policy as suggested within the Publication document.
Sport England	SALPO80	Paragraph 7.16	PPG 17 playing pitch assessment should be carried out in accordance with the Playing Pitch Model methodology (PPM). If this was the case the table would not show hectares for the Outdoor Sports Facilities but the typology instead. Therefore Sport England would suggest these figures are unsound for the Outdoor Sports Facilities and they should either be omitted or made robust by following the PPM.	Comments are noted. The Worcestershire County Playing Pitch Strategy provides a detailed analysis of playing pitches by typology. This informed the PPG17 audit.
Natural England	SALPO44	Policy 22 - Providing a Green	Natural England very much supports the inclusion of this policy particularly the requirement for new	Support is noted and welcomed.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
		Infrastructure Network	development to contribute towards the delivery and enhancement of the River Severn and River Stour Corridors and the Staffordshire and Worcestershire Canal and the proposal to safeguard an area for the creation of the Stour Valley Country Park. We would welcome a firmer commitment to the delivery of the Country Park, e.g. through developer contributions.	Consider including more detail on the delivery of the Stour Valley Country Park within the Publication document.
Natural England	SALPO45	Policy 22 - Providing a Green Infrastructure Network	At the moment, there is no mention of the Wyre Forest in the policy itself. Although it is not as clear a 'strategic corridor' as the rivers, the Wyre Forest is still a strategic green infrastructure asset. It could perhaps be described as a 'strategic node' or 'strategic site'. For this reason we recommend a reference to the Wyre Forest along with the Rivers Severn and Stour and the canal, with a shared requirement for developers to contribute towards its delivery and enhancement. This would also reflect policy CP13 in the adopted Core Strategy.	Comments are noted. Consider including a reference to the Wyre Forest itself, and a shared requirement for developer contributions within the Publication document.
Natural England	SALPO46	Policy 22 - Providing a Green Infrastructure Network	There is no mention of acid grasslands or heathlands in either the policy or the supporting text. The importance of Wyre Forest District's acid vegetation communities needs to be recognised. Larger sites such as the Devil's Spittleful SSSI act as locally important green infrastructure nodes/sites. Taken together, the acid communities form a patchwork across the district. Steps should be taken to enhance the functionality of this patchwork by creating/enhancing links between sites. We recommend naming the heathlands and acid grasslands as a habitat which developers should contribute towards the delivery and enhancement of.	Comments are noted. Consider naming the heathlands and acid grasslands as a habitat which developers should contribute towards the delivery and enhancement of.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			This would also reflect policy CP13.	
Natural England	SALPO47	Policy 22 - Providing a Green Infrastructure Network	The policy and supporting text do not recognise the historic environment as an element of green infrastructure. We suggest cross-references to policy 24.	Include a cross-reference to policy 24 to recognise the green infrastructure value of the historic environment.
Worcestershire Wildlife Trust	SALPO136	Policy 22 - Providing a Green Infrastructure Network	<p>Support the inclusion of the policy but recommend slight changes to reflect the significant biodiversity enhancement drivers that underpin GI. Key habitats include the Wyre Forest itself and the heathland and acid grassland, and there is a need to promote work to restore and enhance these features where opportunities exist. These features are equally important in a GI and landscape-scale conservation context as the valuable corridors already mentioned in the policy and should be accorded the same status.</p> <p>Harmful development should be directed away from existing sensitive links and areas where high potential exists to re-create biodiverse green links in the landscape. Where possible opportunities should be taken to use development contributions to achieve habitat creation and restoration that aims to recreate a living landscape with well linked habitats providing ecosystem services for local communities.</p>	Comments are noted and support is welcomed. Consider including further information in the Publication document.
English Heritage	SALPO179	Policy 22 - Providing a Green Infrastructure Network	Welcomes the aspirations of the policy. Aware of the County's GI work which encompasses the historic environment and interested to know how this has been taken into account or compliment's the District's Green Infrastructure Strategy.	Comments are noted and support is welcomed. The County's GI work has informed, and will continue to inform the preparation of the District Council's Green Infrastructure Strategy.
British Waterways	SALPO193	Policy 22 -	BW welcomes these requirements but suggests bullet	Comments are noted and support is

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
		Providing a Green Infrastructure Network	point relating to canal is amended: "Development should seek to enhance the biodiversity quality of the canal corridor whilst recognising the multifunctional nature of the corridor." Roles include catalyst for regeneration, water supply, drainage/flood management, heritage, ecological resource, sustainable transport etc.	welcomed. Re-word to "Development should seek to enhance the biodiversity quality of the canal corridor whilst recognising the multifunctional nature of the corridor.
Environment Agency	SALPO264	Policy 22 - Providing a Green Infrastructure Network	We welcome the first bullet point in policy 22 relating to the River Severn and River Stour Corridors. We support the reference to improving the biodiversity value of the river corridors and to removing culverts. Reference should also be made to maintaining and improving the water quality of the rivers and to flood risk betterment where possible i.e. restoring in addition to maintaining the functional floodplain. For example improved easements adjacent to the river corridor.	Comments are noted and support is welcomed. Consider this is covered elsewhere in the Local Development Framework including policy CP02 of the Adopted Core Strategy.
WCC - Environmental Policy & Strategic Planning	SALPO332	Policy 22 - Providing a Green Infrastructure Network	<p>No mention of landscape character or linking this policy to the Green Belt designation. No larger context to position Green Infrastructure in the wider rural landscape. Over reliance on PPG17 information in relation to GI and overemphasis on safeguarding PPG17 assets. GI should be multi-functional.</p> <p>Supports the inclusion of the Severn and Stour as key GI corridors, although greater emphasis could be placed on the multi-functionality including recreational access. We welcome opportunities to link the river corridors into the wider GI assets of the district and the county.</p>	Comments are noted and support is welcomed. The District Council is actively involved with the County's GI work and it will continue to inform the Local Development Framework. Consider revising the policy and reasoned justification in light of the comments received.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			The County has a sub-regional GI steering group which is developing a GI approach for the whole County. The sub-regional approach enables assets to be created, maintained and enhanced across geographical boundaries to maximise their benefits for all.	
Sport England	SALPO81	Paragraph 7.24	The Six Acre Standard was a national standard. Response quotes paragraphs 1 and 2 of PPG17. Proposals are not considered robust as they do not follow national guidance.	Noted. Review national guidance and amend if necessary.
WCC - Environmental Policy & Strategic Planning	SALPO333	Safeguarding and Enhancing the Natural Environment	Welcome the relationship to the sustainable community strategy, safeguarding both the unique landscape and rich biodiversity of the district.	Comments are noted and support is welcomed.
Herefordshire & Worcestershire Earth Heritage Trust	SALPO130	Paragraph 7.26	Whilst the comments raised in this paragraph are to be welcomed and not objected to in any way, geodiversity is missing from this summary of the natural environment. A statement should be included to highlight geodiversity and its integral link with influencing and supporting the biodiversity of the District.	Comments are noted and support is welcomed. Include a reference to geodiversity and its linkages to biodiversity as suggested.
Natural England	SALPO49	Policy 23 - Providing Opportunities for Safeguarding Local Biodiversity and Geodiversity	Supports the inclusion of the policy but advise that it should do more to support positive gains for biodiversity, both within and outside of designated sites. Refers to the Natural Environment and Rural Communities Act 2006, PPS9 and Section 28G of the Wildlife and Countryside Act 1981 (as amended) and suggests that the policy should include a clause stating that all developments should take steps to enhance biodiversity, including provision for developer	Consider strengthening the policy in the Publication version of the document.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			contributions.	
Herefordshire & Worcestershire Earth Heritage Trust	SALPO132	Policy 23 - Providing Opportunities for Safeguarding Local Biodiversity and Geodiversity	<p>Strongly support and welcome the policy.</p> <p>Local Geological Sites can be shortened to LGS</p> <p>"the interests of nature and biodiversity conservation" can be amended to read "the interests of nature conservation" as nature includes biodiversity and geodiversity.</p>	<p>Support is noted and welcomed.</p> <p>Amend Local Geological Sites to LGS after first use.</p> <p>Amend "the interests of nature and biodiversity conservation" to "the interests of nature conservation".</p>
Worcestershire Wildlife Trust	SALPO137	Policy 23 - Providing Opportunities for Safeguarding Local Biodiversity and Geodiversity	<p>The Trust is pleased to support the intent of this policy but we would like to see it strengthened significantly, in particular the policy should be explicit about the need to deliver biodiversity enhancement in line with PPS9 and the Council's duty under Section 40 of the Natural Environment and Rural Communities Act 2006.</p> <p>Sub-section b) should also reflect the fact that where development need requires development to proceed and therefore cause harm mitigation and compensation will be required.</p> <p>We would recommend that you cross-reference this policy with Policy 19, Policy 22 and Policy 24 as there are many potential synergies between them.</p>	<p>Comments are noted and support is welcomed. Consider strengthening the policy as suggested. Consider amending sub-section b) to include mitigation and compensation measures. Cross-reference this policy to Policies 19, 22 and 24 as suggested.</p>
WCC - Environmental Policy & Strategic Planning	SALPO334	Policy 23 - Providing Opportunities for Safeguarding Local Biodiversity and	<p>We support the inclusion of statutory and non-statutory (local sites) sites for nature conservation within the policy and the emphasis on their protection.</p> <p>We welcome the inclusion of a table for national,</p>	<p>Comments are noted and support is welcomed.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
		Geodiversity	regional and local designated sites	
Herefordshire & Worcestershire Earth Heritage Trust	SALPO133	Paragraph 7.30	<p>Areas of National Importance:</p> <ul style="list-style-type: none"> - Kinver Edge has one earth heritage SSSI unit within the District - this is currently not listed. <p>Local Geological Sites:</p> <ul style="list-style-type: none"> - There are two Local Geological Sites missing from the list. Please contact the Geological Records Centre for updated information. 	Comments are noted. Update information for the Publication version.
Campaign to Protect Rural England	SALPO187	Paragraph 7.30	Paragraph 7.30 (table) contains a typo. It is Arley Wood (being in Upper Arley) not Areley Wood (not being in Areley Kings, Stourport). If Areley Kings really is meant, Areley Kings should be given as the name	Comments are noted. However, Areley Wood is the correct spelling as it lies to the west of Areley Kings.
Wolverley & Cookley Parish Council	SALPO321	Paragraph 7.30	The Parish Council welcome the protection of the Bishops Meadow Nature Reserve and welcome any improvements to it.	Support is noted and welcomed.
Natural England	SALPO50	Policy 24 - Heritage Assets	Natural England welcomes the recognition of landscape features in this policy. The historic environment is an important part of green infrastructure, and a green infrastructure led approach to development could aid in the conservation of historic environment features, e.g. allowing archaeology to remain in situ or strategically placing greenspace to preserve the setting of a listed building or SAM. We suggest policy cross-references.	Support is noted and welcomed. Include policy cross-references within the Publication version.
Worcestershire Wildlife Trust	SALPO138	Policy 24 - heritage Assets	The Trust is pleased to support this policy and in particular references to hedgerows, ancient woodlands etc. in this context.	Support is noted and welcomed.
WM Morrison	SALPO296	Policy 24 -	Objects to policy 24, three criteria set out are	Comments are noted. Consider how this

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Supermarkets Plc		Heritage Assets	unclear. It is not clear whether all criteria apply to all applications or whether some are for demolition only for example. We suggest that this is clarified by inserting the words and or after each clause.	can be clarified within the Publication document.
WM Morrison Supermarkets Plc	SALPO294	Policy 24 - Heritage Assets	<p>Objects to policy 24 as the policy is unclear, and conflicts with the reasoned justification, particularly regarding the scope and detail required in a heritage statement.</p> <p>Although the policy and reasoned justification list a number of heritage assets, footnote 11 states that this list is not exhaustive and could include other features which arise over the plan period. Either footnote 11 should be removed or, if retained, additional information should be provided in the reasoned justification to clarify what is required in Heritage Statements for those features referred to within it.</p>	Comments are noted. Consider removing the footnote.
English Heritage	SALPO275	Policy 24 - Heritage Assets	<p>Pleased that the document includes a specific policy on the historic environment. Questions whether the commitment in the Core Strategy to produce a specific Historic Environment SPD should be carried through into the Site Allocations and Policies DPD.</p> <p>Includes the following suggestions for improving the policy further and strengthening its soundness in the context of PPS5:</p> <ol style="list-style-type: none"> 1. Welcomes the inclusion of landscape character in the list of heritage assets but questions the extension to drainage ditches and nature conservation. 2. Welcome the policy support for preparing a 	Comments are noted and support is welcomed. Consider making amendments suggested.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>Heritage Statement.</p> <p>3. This paragraph - suggest that a new point could be added at the beginning of the list which puts emphasis on understanding the significance of the heritage asset and the contribution of the setting to this significance. Recommends that in point a greater emphasis is put on the significance of the heritage asset 'detrimental impact on <i>the significance on of a heritage asset or its setting</i> and' Under point b we suggest 'techniques' are also highlighted as well as materials and styles. Under point c suggest also refer to 'setting' at the end of the last sentence.</p> <p>4. Policy 24 fourth paragraph and paragraph 7.54: We recommend these are reviewed against the provisions of PPS5 and Policy HE9 and in particular the demonstration of substantial public benefits which would outweigh the potential harm to or loss of a heritage asset.</p> <p>5. Para 7.38 - welcomes the prominence given to heritage statements. Recommends re-wording to read "summarise the heritage interest of the heritage asset (archaeological, architectural, artistic or historic) and its significance'.</p> <p>6. Para 7.52 - recommends underlining early consultation with the County HER, as well as highlighting that not all archaeological remains are identified and sites may have archaeological potential.</p> <p>7. Recommends the supporting text includes an</p>	

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>additional sub-section on historic landscapes to include Registered parks and Gardens and other non designated historic landscapes as well as the role of the county wide historic landscape characterisation in providing information on the surviving historic farmsteads provided by the West Midlands Historic Landscapes and Farmsteads Project - particularly the county summary report and Farmstead Character Statements covering the area.</p> <p>8. Comments on policy 18 highlighted sustainability considerations relating to energy conservation measures and historic buildings. It may be appropriate to expand on the sustainability section here to address this.</p>	
Campaign to Protect Rural England	SALPO188	Paragraph 7.52	Paragraph 7.52 should contain a cross-reference to the relevant PPS.	Comments are noted. Consider including a cross-reference to PPS5 as suggested.
Shaylor Developments	SALPO91	Paragraph 7.53	On behalf of Shaylor Developments RPS Planning & Development would like to support the text in paragraph 7.53 as recognition by the Council that enabling development proposals will be considered on their merits as a means of securing the long-term use of a heritage asset.	Comments are noted and support is welcomed.
Natural England	SALPO51	Policy 25 - Design Quality and Local Distinctiveness	Natural England supports the inclusion and general thrust of this policy. We particularly welcome point M of this draft policy, around green infrastructure.	Comments are noted and support is welcomed.
Natural England	SALPO52	Policy 23 - Biodiversity and	We suggest an additional point regarding building in biodiversity benefits, in accordance with the Town and	Consider that this is already covered by policy CP14 of the Adopted Core Strategy

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
		Geodiversity	Country Planning Association's Biodiversity by Design, which is available online at http://www.tcpa.org.uk/pages/biodiversity-by-design.html . Features such as swift bricks and bat lofts can be easily integrated into the built environment as standard.	and Policy 23 of the Site Allocations and Policies.
Natural England	SALPO53	Policy 23 - Biodiversity and Geodiversity	The draft policy does not mention climate change adaptation. We are now locked in to experiencing climate change, and new developments need to be designed with future climates in mind. Point f on climate change mitigation could be expanded to encompass adaptation.	Consider incorporating climate change mitigation within the Publication version.
Asda Stores Ltd	SALPO178	Policy 25 - Design Quality and Local Distinctiveness	The policy as worded says that "All proposals for new development must demonstrate that they:..." comply with a long list of design criteria. Site specific constraints may mean that some development will not be capable of meeting all these requirements. The policy should therefore be reworded so as to say "All proposals for new development must demonstrate that where possible they...".	Comments are noted however this will not achieve the level of design quality which the policy seeks.
Worcestershire Wildlife Trust	SALPO139	Policy 25 - Quality Design and Local Distinctiveness	The Trust is pleased to support the intent of this policy but we would recommend an additional bullet point, or perhaps an addition to the very welcome sub-section m), to cover the need for biodiversity enhancement in the built environment. Provision of bird and bat roosting / nesting opportunities can be easily accommodated in modern development and there should be a strong policy presumption that this will take place.	Comments are noted and support is welcomed. Consider that this is already covered by policy CP14 of the Adopted Core Strategy and Policy 23 of the Site Allocations and Policies.
Campaign to	SALPO189	Policy 25 - Quality	Policy 25 should require compliance with any adopted	Comments are noted. However compliance

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Protect Rural England		Design and Local Distinctiveness	Village Design Statement, Parish Plan or Neighbourhood Plan and there should be a cross-reference to ensure conformity.	must be with Statutory Planning documents.
West Mercia Police	SALPO249	Policy 25 - Quality Design and Local Distinctiveness	Support policy 25 and supporting text, especially para. 7.61 and 7.63. Suggest that CP 11 from the Core Strategy is cross-referenced and that the Monitoring and Implementation Framework includes a commitment to monitoring how many schemes in the District achieve 'Secured by Design' standards.	Comments are noted. The number of development meeting 'Secured by Design' standards is a Sustainability Appraisal indicator. Consider cross-referencing Policy CP11 of the Adopted Core Strategy.
WCC - Environmental Policy & Strategic Planning	SALPO335	Policy 25 - Quality Design and Local Distinctiveness	<p>We would welcome the inclusion of references to landscape character and how this can influence local distinctiveness. LCA may be less relevant to urban design but rural development should look to integration within the rural setting.</p> <p>We welcome the inclusion of biodiversity within this. Local distinctiveness may also include elements of biodiversity and ecology which should be retained within developments as appropriate e.g. veteran trees.</p> <p>Good design may also include elements of GI, such as street tree planting which can contribute to good quality design but include multi-functionality.</p>	Comments are noted. Consider including a reference to landscape character within the design policy or reasoned justification.
Natural England	SALPO54	Policy 26 - Landscaping and Boundary Treatment	Welcomes the inclusion of the policy and the benefits it could bring for biodiversity and green infrastructure, recommends that policy makes this a requirement. Suggests consideration should be given to specifically requiring a financial contribution towards the long term management of landscaping.	Support is noted and welcomed. The long-term management of landscaping must be through alternative funding or management mechanisms.
Worcestershire	SALPO141	Policy 26 -	We are pleased to support the thrust of this policy but	Comments are noted and support is

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Wildlife Trust		Landscaping and Boundary Treatment	we would recommend that it be strengthened to include a bullet point regarding the need to provide biodiversity enhancement in line with national policy and guidance, perhaps by reference to policy 23. This would accord with bullet point a) regarding SUDS.	welcomed. Consider including an additional point within the Publication version regarding the need to provide biodiversity enhancement, possibly by referring to Policy 23 in a similar way to that in which bullet point a) deals with SUDS.
WCC - Environmental Policy & Strategic Planning	SALPO336	Policy 26 - Landscaping and Boundary Treatment	<p>Welcomes the inclusion of this policy, particularly SUDS. Reference could be made to the Flood and Water Management Act.</p> <p>Policy should include stronger reference for the need for the overall design to integrate with the surrounding landscape. Currently no requirement for Landscape Character Assessment to be considered.</p> <p>Welcomes the requirement of the planning of native species, however, these should be native to the given area. No mention of protection of existing trees or distinct landscape features.</p>	Comments are noted and support is welcomed. Consider revising the policy in light of the comments received. Further information on SUDS is set out within Policy 19 - Implementation of SUDS and it is not considered appropriate to repeat this here.
Natural England	SALPO56	Policy 27 - Re-Use and Adaptation of Rural Buildings	We welcome point 2 iii, which requires no adverse impact on the landscape and wildlife.	Support is noted and welcomed.
Watkins R A	SALPO74	Policy 27 - Re-use and Adaptation of Rural Buildings	Footnote should be part of policy wording. Should be flexibility to allow extensions to converted barns.	Comments are noted however, paragraph 7.80 sets out the justification for the policy approach. Consider moving the footnote into the policy itself.
Worcestershire Wildlife Trust	SALPO142	Policy 27 - Re-use and Adaptation of Rural Buildings	The Trust is pleased to support bullet point iii in section 2) Residential Development. We would also suggest that a similar bullet point be added under Section 1) Economic Development.	Comments are noted and support is welcomed. Consider including an additional bullet point under section one which is similar to bullet point iii of section 2.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Campaign to Protect Rural England	SALPO190	Policy 27 - Re-use and Adaptation of Rural Buildings	<p>Policy is generally welcome, but need requirement that buildings for conversion should be of substantial construction so as to exclude for example covered yards, dutch barns, pigsties and chicken coops.</p> <p>Objective should be to retain traditional brick built farm buildings - stronger policy wording is needed</p>	Comments are noted however it is felt that this is covered under point (i).
English Heritage	SALPO349	Policy 27 - Re-Use and Adaptation of Rural Buildings	<p>Strongly recommends that policy 27 and supporting text gives greater attention to and uses the products produced through the West Midlands Historic Farmsteads and Landscapes Project. This would include greater emphasis on understanding the character and significance of a farmstead as a whole, its landscape setting and its sensitivity and potential to change.</p> <p>Additionally, English Heritage are keen to ensure a sufficiently positive and flexible approach for promoting the sustainable use and re-use of historic farmsteads, including the consideration of all appropriate uses (agriculture, economic and residential). Refers to the Summary Report of the West Midlands Project which demonstrates that the majority of farmsteads in non-farming use provide homes. Suggests that the economic significance of residential use can be overlooked with historic farmsteads providing the basis for a wide range of home-based enterprise. This is relevant for the District which falls into the area of 'highly accessible rural areas around the central conurbation'.</p> <p>Would be happy to discuss this in more detail.</p>	Comments are noted. The policy set out is in accordance with the Adopted Core Strategy which promotes economic uses for farmsteads in preference to residential. The economic use of farmsteads includes live-work units. Meet with English Heritage to consider how the West Midlands Historic Farmsteads and Landscapes Project can be incorporated into the policy and reasoned justification.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Environment Agency	SALPO265	Policy 27 - Re-use and Adaptation of Rural Buildings	Consideration should be given to flood risk and whether the proposed development (building) can be made safe for a 1% plus climate change design flood event. This could be included within the criteria of policy 27. Consideration should be given to non-mains foul drainage matters for rural areas.	Comments are noted. If flood risk is an issue, this would be picked up through PPS25 and CP02.
WCC - Environmental Policy & Strategic Planning	SALPO337	Policy 27 - Re-use and Adaptation of Rural Buildings	Residential Development - welcome the inclusion iii, 'that there will be no adverse impacts on the countryside, landscape and wildlife'. However this should also be included with economic development of rural buildings. 7.79-Text would benefit from being amended accordingly: 'considered in light of the physical effects of the proposed conversion on the character of the building, <i>existing wildlife</i> and its appearance in the landscape'.	Comments are noted. Amend paragraph 7.79 as suggested.
Watkins R A	SALPO75	Policy 28 - Chalets	Chalets by definition are dwellings, some with occupancy restriction, some without. Criteria 'c' to allow replacement chalets only for holiday use is not reasonable if the existing chalet has established residential use.	Consider revising this policy to allow for chalets which have an established residential use to be replaced by chalets for residential use.
Environment Agency	SALPO266	Policy 28 - Chalets	We support the reference to flood risk in Part b of policy 28. However we would recommend that it is altered to refer to the floodplain (location) in addition to building design i.e. not liable to flooding or located within the floodplain. Within part c of policy 28 we would wish to see a reference that, for sites located within the floodplain, consideration is given to relocating the caravan(s) to	Comments are noted. Consider altering the policy to include suggested changes.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			an area of lower flood risk (i.e. managed retreat).	
Natural England	SALPO57	Policy 29 - Equestrian Development (Horsiculture)	Equestrian developments have the potential to impact on biodiversity as well as landscape, and we would welcome the recognition of this within the policy or its supporting text.	Comments are noted. Consider including appropriate wording within the Publication version to recognise this.
Watkins R A	SALPO76	Policy 29 - Equestrian Development (Horsiculture)	Policy wording is too complicated. Policy must differentiate between keeping of horses and erection of stables and between recreational and commercial uses.	Comments are noted. Consider this issue in more detail when developing the Publication document.
Watkins R A	SALPO77	Paragraph 7.87	Paragraph is too dogmatic and should relate to the size of field etc. <u>and</u> the landscape setting.	Comments are noted. Consider this further when developing the Publication document.
Davies Mrs E	SALPO23	9 - Introduction	Lack of identification of sites for "first" homes.	All developments of six dwellings or more within Bewdley and the rural areas, and 10 dwellings or more within Kidderminster and Stourport-on-Severn must provide affordable housing in accordance with Core Strategy policy CP04. Developments will also be required to incorporate a mix of dwelling types and sizes in accordance with Core Strategy Policy CP05.
English Heritage	SALPO350	9 - Introduction	In general the explanation and policy framework appears to identify the site specific heritage assets and considerations. Suggests clarifying whether or not the County's HER has been used to identify any archaeological remains associated with the sites.	Support is noted and welcomed. The HER has not been used to identify archaeological remains associated with the site. Consider using HER to inform the Publication document or clarifying that this has not been done.
English Heritage	SALPO352	9 - Introduction	Identifies that a number of sites within Stourport-on-Severn have sensitivities relating to heritage assets and although these are reflected in the policies and	Comments are noted. The County's HER has not been used to identify potential archaeological interest, consider either doing

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			text it would be useful to clarify whether the County's HER has been used to identify archaeological interest. Endorses the importance of early pre-application discussions on future proposals.	this for the Publication document or clarifying that this information has not been included.
Environment Agency	SALPO267	9 - Introduction	We note that the DPD refers to infrastructure for some of the sites, but there is no reference to environmental infrastructure for any of the sites. This section should be further informed by the emerging Infrastructure Delivery Plan. In addition the Sequential Testing should be completed to inform the development of sites.	Comments are noted. The sites have been informed by the Water Cycle Strategy and will be further refined through the emerging Infrastructure Delivery Plan.
Environment Agency	SALPO268	9 - Introduction	<p>Having reviewed the Part B site allocations, the potential for land contamination issues to arise is relatively high throughout the area given its industrial heritage, which will ultimately influence the viability and phasing of the redevelopment. As it stands none of the policies in part A of the DPD specifically mention the need for land contamination investigation. We have previously referred to land contamination and its importance, given the areas industrial heritage and hydrogeological setting (see information below), in our response at the issues and options stage of this DPD (our letter dated 13 March 2009 refers).</p> <p>We acknowledge that land contamination issues have been considered within policy CP01 of the adopted CS. Therefore if you are not minded to include a policy within part A of this DPD, we would seek a reference to land contamination within the introduction to Part B with a link to policy CP01 of the CS. As part of this it should be noted that re-development proposals</p>	Comments are noted. It was the intention that contaminated land was dealt with under policy CP01 of the Core Strategy. However, a link to this policy in the introduction of Part B is considered to be a sensible suggestion, especially given the development strategy proposed for the District. Look to amend accordingly.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			(planning applications) for all of the sites will need to be accompanied by a desk study report, as a minimum requirement	
Environment Agency	SALPO269	Stourport Road Employment Corridor	This area has a long history of industry. Therefore land contamination will be a significant issue that will influence the need for remediation and appropriate building (foundation) and drainage design at all the sites. The corridor is located on a principal aquifer of regional strategic importance and within the combined source protection zone for a number of public water supply boreholes. It is therefore essential that the above issues are appropriately addressed.	Comments are noted. These are issues that were picked up through the Core Strategy (CP01 and CP02) and will therefore be considered through any development proposals coming forward within this area. Stronger links to contamination issues are proposed to be included in the introduction to Part B.
Mace G	SALPO2	Policy 32 - Former British Sugar Site - (SAL.SK.2)	The British Sugar Site should be considered a priority and the silos should be demolished.	The British Sugar Site is prioritised within the Site Allocations and Policies Development Plan Document and a masterplan for the site's development is currently being prepared in conjunction with the site's owners, work is also on-going to determine whether the silos could be reused or whether they will need to be demolished.
Natural England	SALPO58	Policy 32 - Former British Sugar Site - (SAL.SK.2)	We welcome point f, which requires proposals for this site to protect and enhance the Wilden Marsh and Meadows SSSI, as well as point e, which requires the provision of a comprehensive GI network. We would encourage the developer and the council to discuss constraints and opportunities regarding Wilden Marsh and Meadows SSSI early on in the masterplanning process.	Support is noted and welcomed. Ensure that Natural England is involved with the masterplanning process.
Worcestershire Wildlife Trust	SALPO143	Policy 32 - Former British Sugar Site -	The Trust is pleased to support bullet points e) and f) of this policy, which are vital if the potential	Comments are noted and support is welcomed. Engage the Trust in discussions

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
		(SAL.SK.2)	environmental impacts of development here are to be dealt with effectively. We would welcome the chance to engage in discussions regarding proposals on this site, particularly with respect to our nearby nature reserve, the River Stour SWS and the Staffordshire and Worcestershire canal SWS.	on this site from the earliest possible stage.
Campaign to Protect Rural England	SALPO192	Policy 32 - Former British Sugar Site - (SAL.SK.2)	<p>Policy is generally welcome but should give:</p> <ul style="list-style-type: none"> • stronger encouragement to possible railway station on site with potential for park and ride to enable commuting through to Birmingham for local residents. • provide for pedestrian access across canal to Wilden Marshes • small area by sewage works could potentially be added to site • should seek to secure access to canal and marshes even from phase 1 of development • site should be developed in accordance with masterplan • plan on p.108 is merely indicative - this should be made clear 	Comments are noted and support is welcomed. Consider suggestions further during the development of the Publication document.
St Francis Group	SALPO243	Policy 32 - Former British Sugar Site - (SAL.SK.2)	The site plans and Development Concept Plan (Picture 10.1) are supported. St Francis Group is committed to delivering a mixed use scheme, which is generally in accordance with the Development Concept Plan; although the precise location and mix of uses may well still change following further detailed testing. It may be better to describe the plan as illustrative at this stage. As highlighted above, since the Site Allocations and Policies document was published further work has been completed identifying	Noted - updated concept and development plans can be included within subsequent versions of the document to reflect the latest changes to the masterplanning work being undertaken on the site. Any plan/scheme would remain illustrative to retain the flexibility to consider the best layout and development mix of the site, in line with the adopted policy.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>a suitable route for the Hoobrook Link Road. The Development Concept Plan should be updated to reflect the latest alignment.</p>	
St Francis Group	SALPO244	Policy 32 Former British Sugar Site (SAL.SK.2)	<p>In the main, it is considered that the proposed policy for the former British Sugar site is generally sound other than for a few issues which need to be resolved through ongoing discussions with the Council prior to the preparation of the Submission Draft Site Allocations and Policies document.</p> <p>It is considered that in general terms the Site Allocations and Policies document is sound, however, a number of amendments as highlighted within these representations need to be made in order to provide clarity and justification, improve effectiveness and deliverability, all of which will improve soundness.</p> <p>One of the main points to address is in respect of whether the proposed phasing approach to delivering housing is necessary. As highlighted in the representations above, it is considered to be superficial as there is no reasonable justification to delay the delivery of housing land, particularly when the majority of the sites are previously developed and will deliver on a number of objectives in the Core Strategy.</p>	<p>Comments are noted. The overall view on soundness of the document is welcomed. Further amendments to reflect consultation comments will be made during the preparation of the submission draft document. With regard to the specific point on the proposed phasing approach, it is considered to be an indicative target and is not included to stifle development from coming forward.</p>
St Francis Group	SALPO235	Policy 32 - Former British Sugar Site - (SAL.SK.2)	<p>The identification of the former British Sugar site as an allocation for mixed use development is supported. Policy 32, entitled the former British Sugar site, and accompanying text is generally welcomed, however, there are a number of points to highlight in order to</p>	<p>Comments are noted and support is welcomed.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			ensure the policy is effective and deliverable, which will ultimately improve soundness.	
St Francis Group	SALPO236	Policy 32 - Former British Sugar Site - (SAL.SK.2)	<p>It is considered that the first part of the policy should be presented in a different way to avoid confusion in respect of the quantum of land uses that can be delivered on site. As currently worded it appears that there will be 12 ha of employment land, 320 dwellings and other commercial uses (including community and tourism facilities). Going back to the original proposals as set out within the Background Document (February 2010) submitted as evidence to the Core Strategy, the original proposal was for 50% of the site to be used for future employment, leisure and commercial uses and the remaining 50% of the site to be used to provide new dwellings and associated open space. It is considered that the policy should be redrafted in order to include the commercial uses with employment land, as originally set out in the Background Document. A revised policy is set out below.</p> <p>Proposals for the site will include:</p> <ul style="list-style-type: none"> • A mixed use development incorporating a significant number of residential units (C2/C3), (approximately 320) and employment generating uses (approximately 12 ha gross) that could include: <ul style="list-style-type: none"> (i) Employment land (Use classes B1, B2 and B8) (ii) Ancillary commercial uses (iii) Community Facilities (Use class D1) (iv) Tourism (inc hotel) and non-town centre 	Comments are noted. Consider this further during the development of the Publication document and through the masterplanning process.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<i>leisure</i>	
St Francis Group	SALPO237	Policy 32 - Former British Sugar Site - (SAL.SK.2)	In terms of the paragraph which includes a caveat “subject to sequential test”, it is suggested that the evidence is prepared by the Council, in association with St Francis Group, to demonstrate that such uses are sequentially appropriate on site, which will ultimately reduce opportunities for the DPD to be challenged.	Noted. Consider this further through discussions with site owner and agents.
St Francis Group	SALPO238	Policy 32 - Former British Sugar Site - (SAL.SK.2)	It is agreed that a “comprehensive Masterplan that embraces the latest urban design thinking” should be agreed. St Francis Group has demonstrated a commitment to this through previous meeting with the Council to discuss the development of the site.	Noted and Agree. Continued work on a masterplan for the site is welcomed.
St Francis Group	SALPO239	Policy 32 - Former British Sugar Site - (SAL.SK.2)	<p>In respect of the remaining criteria, which proposals for the site must include, the following comments are offered:</p> <ul style="list-style-type: none"> • it is agreed that the line for the Hoobrook should be safeguarded and provide onsite and offsite measures to mitigate against any adverse transport impact, including access to the local road network; • as outlined previously, St Francis Group is in discussion with Severn Valley Railway in order to incorporate a link for passengers. It has been concluded that a freight link is inappropriate and therefore this reference should be removed from the policy; • it is agreed that the proposal should provide for cycle and footpath networks throughout the site to enable connections to be made to this site and to other adjacent areas; 	Comments are noted. It is acknowledged that rail freight may not be feasible at the site and should this be demonstrated to be the case, it will not be enforced. Seek to make the green infrastructure element of the policy more site specific. Seek to clarify what is meant by providing 'landmark development' and making full use of the site's strategic position on the edge of the Stour Valley in the Publication document. Discuss these points further as part of the development of the Publication document and through the masterplanning process.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<ul style="list-style-type: none"> • appropriate sports pitch provision is required either improving existing facilities or compensatory provision. The element of the policy is considered to repeat policy set out nationally in PPG 17 and is therefore unnecessary; • in terms of providing a comprehensive Green Infrastructure Network, which connects and complements important adjacent wildlife areas etc. It is considered that this simply repeats the content of earlier policies. It is not locally specific and therefore should be removed. • it is agreed that the development should safeguard adjacent conservation areas and SSSI; • in terms of maximising the connectivity of the site to nearby centres and attractions, it is considered that this repeats policy statements above in respect of railway, cycle and footpath connections. • in terms of investigating the potential for "land mark" development, it is unclear what this would entail. Further clarification is requested; • again, in relation to making full use of the site's strategic position on the edge of the Stour Valley, it is unclear what is meant by this. Further clarification is requested; • it is agreed that contamination issues should be fully considered and mitigated against; and • it is agreed that the proposal should have full regard to the HSE zone that affects the site and locate uses accordingly. 	

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
British Waterways	SALPO194	Policy 32 - Former British Sugar Site - (SAL.SK.2)	Given that Canal bounds former British Sugar site, greater emphasis should be given to it when identifying requirements that proposals should meet. CP15 should be added to list at para. 10.24. Policy 32 could be reworded to incorporate some of following: integrate land and water; open up access to, from and along canal; explore the added value and use of water space; and view canal, towing path and environs as part of the public realm, enhance the use, enjoyment and setting of the canal.	Comments are noted. Consider including further guidance on how the development will be required to address the Staffordshire & Worcestershire Canal Conservation Area. Add policy CP15 to the list of relevant Adopted Core Strategy policies.
English Heritage	SALPO351	Policy 32 - Former British Sugar Site - (SAL.SK.2)	Considers that the potential for the retention of the two remaining silos could be more positively encouraged within para 10.23.	Comments are noted. Whilst the policy encourages the retention of the silos, they will only be retained if a viable use can be found for them.
Environment Agency	SALPO270	Policy 32 - Former British Sugar Site - (SAL.SK.2)	<p>We note that policy 32 states that the proposals for the site must 'ensure that contamination issues are fully considered and mitigated against'. The document notes that contamination needs to be considered from the outset (paragraph 10.22) and appropriate investigation studies undertaken, which we support. This should inform and be followed by remediation and validation to an acceptable standard, in line with policy CP01 of the adopted CS.</p> <p>Welcome the inclusion of the existing pond as a SuDS feature, but would suggest that it is included as part of the SuDS drainage proposals i.e. a drainage strategy will need to be produced to confirm the exact volume of surface water attenuation required on site for a 1% plus climate change event. SuDS proposals will be</p>	<p>Comments are noted. With regard to the contamination issues on the site, the draft policy and the framework included in the Core Strategy provide a clear requirement to ensure that this is properly assessed and mitigated against.</p> <p>In terms of SUDS, the Core Strategy requires new development to incorporate appropriate features within their developments. Any proposals will need to be detailed and agreed through the development management process.</p> <p>The existence of the HSE zone is identified within the policy and provision made to make sure that appropriate uses are located</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>further informed by the site investigation.</p> <p>An existing industrial use located to the south on the Vale Industrial Estate, operates two processes permitted by us under the Environmental Permitting Regulations (2010) to carry on the use and manufacture of organic chemicals. It is also regulated by the Environment Agency and Health and Safety Executive as joint competent authority under the Control of Major-Accident Hazards Regulations (COMAH) 1999, as a lower tier site due to the nature and quantities of the chemical substances stored and used on site. This requires assessment of the on-site risks associated with the storage and use of the substances, and the preparation of an on-site emergency plan. However, the location and the nature of the substances stored would give rise to concerns on the impact of a major incident at the site to both the environment and human health on the proposed development site.</p>	<p>accordingly. The site owners are aware of this issue and are taking it into account through the master planning process.</p>
St Francis Group	SALPO240	Paragraph 10.14	<p>Paragraph 10.14 sets out that the site is primarily in the ownership of one company but that 2 ha to the south east is owned separately. It should be noted that the extract from the SHLAA and the Development Concept Plan include land within the ownership of St Francis Group. In light of this paragraph 10.14 is incorrect and should be updated accordingly.</p>	<p>Comments are noted. Look to amend accordingly. Review paragraph wording and consider more fully the future development of this additional land.</p>
St Francis Group	SALPO241	Paragraph 10.17	<p>A route has been identified and land is safeguarded within the site to provide for the Hoobrook Link Road. This safeguarded route, however, is likely to change from that set out on the Development Concept Plan. In</p>	<p>Comments are noted. The main considerations for the site are included within the policy framework but the actual details are still subject to discussions and</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>terms of the Severn Valley Railway, St Francis Group is investigating potential for providing a halt for the movement of passengers on the line. In that respect discussions are progressing positively, however, it has been concluded that the location is unsuitable for freight (as alluded above).</p> <p>Links to the canal towpath and associated travel network, which lies to the east of the site, will be reviewed as part of the design process.</p>	ongoing negotiations.
Campaign to Protect Rural England	SALPO199	Policy 33 - Oasis Arts & Crafts and Reilloc Chain - (SAL.SK.3)	This site is surrounded by housing. Proposals for development wholly or mainly for housing ought to be acceptable.	Comments are noted.
Reilloc Chain Ltd	SALPO290	Policy 33 - Oasis Arts & Crafts and Reilloc Chain - (SAL.SK.3)	<p>Refers to the former Reilloc Chain premises, Stourport Road. Site is currently vacant and is being marketed however, the nature of the building means that it is not suitable for modern day manufacturing processes. Site has been previously identified within the SHLAA as being suitable for residential development.</p> <p>Refers to the ambulance station which could also be incorporated into any redevelopment if it were to become vacant.</p> <p>Welcomes the inclusion of policy 33 and confirms that the Reilloc Chain premises would be available to delivery development within the first 5 year phasing period.</p>	Comments are noted and support is welcomed.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			Considers that a predominantly residential use would be in keeping with the surroundings and would therefore be most suitable although this could be underpinned by commercial employment generating development such as a small retail element. Site is on a high frequency bus corridor and has access to employment locations and local shops.	
Revelan Group	SALPO342	Policy 34 - Former Romwire Site - (SAL.SK.4)	<p>Objects to the allocation of the former Romwire Site for B1, B2, and B8 uses and other sui generis employment uses such as car showrooms and vehicle maintenance, repair and servicing centres. Argues that a wider range of uses needs to be considered for the site as it has been marketed for a significant period with no take-up. Suggests the following range of uses:</p> <ul style="list-style-type: none"> • B Class employment uses • Public & Community uses • Main Town Centre uses subject to the conformity with the sequential and impacts tests of PPS4. Typically they will be bulky good retail developments. • Uses that provide employment opportunities. • Uses that generate wealth. • Uses that produce or generate an economic output or product. 	Comments are noted. However, the site has been identified within the Employment Land Review as being suitable for employment use and is located within the main employment corridor for the District. It is considered inappropriate to include some of the suggested uses for this site within the policy framework, especially with reference to the main town centre uses.
Natural England	SALPO59	Policy 35 - Worcester Road Employment Corridor - (SAL.SK.5)	We recommend that the policy requires proposals to enhance the Wilden Marsh and Meadows SSSI.	Comments are noted. Consider including a requirement for new development to enhance Wilden Marsh and Meadows within the policy.
Worcestershire	SALPO145	Policy 35 -	We would recommend that this policy makes explicit	Comments are noted. Consider making a

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Wildlife Trust		Worcester Road Employment Corridor - (SAL.SK.5)	mention of the need for development here to contribute to the protection and enhancement of biodiverse local Green Infrastructure, notably the nearby SSSI and SWSs.	more explicit reference to the need for development to contribute to the protection and enhancement of green infrastructure as suggested.
British Waterways	SALPO195	Policy 35 - Worcester Road Employment Corridor - (SAL.SK.5)	Welcome reference to canal and potential for enhancement as part of overall scheme. The 'added value' of the water space needs to be fully explored.	Comments are noted and support is welcomed.
Environment Agency	SALPO271	Policy 35 - Worcester Road Employment Corridor - (SAL.SK.5)	Raises concern that land contamination is likely to be an issue in this area and requests that this is acknowledged within the policy. Site is located on a principal aquifer of regional strategic importance and lies within the combines source protection zone for a number of public water supply boreholes. The northern part of the site falls within the inner and outer source protection zone of a public water supply borehole and it is therefore a very sensitive hydro setting. The groundwater is also relatively shallow in part of the area located with the river valley. It is therefore essential that the land contamination issues are appropriately addressed. It will also be necessary to ensure that the proposed land use (activities), drainage design, foundations etc. are appropriate to the site setting. The proposed land uses should meet the requirements of our GP3 (Groundwater Protection Policy and Practice) guidance. Refers to relevant background documents related to this issue.	Comments are noted. It is proposed to make stronger references to Policy CP01 of the Core Strategy within the Site Allocations Document to ensure that land contamination is fully considered in any development proposals. With regards to issues such as drainage design and construction etc, it is considered that these would be picked up via the Development Control process. However, the Council will consider whether to make further reference to practice guidance where appropriate.
Campaign to Protect Rural England	SALPO200	Policy 36 - Blakebrook School and County	Policy 36 should be prefaced by a statement that it will only become operational upon the school becoming redundant from its present educational use. This	Comments are noted. This is covered by paragraph 11.2.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
		Buildings - (SAL.WK.1)	should probably be similar to the first paragraph of Core Strategy Policy CP07.	
Natural England	SALPO60	12 - Kidderminster - Smaller Sites	Broadwaters Community Centre – Footpath connections to the canal, Stourvale Marsh SSSI and Puxton Meadows SSSI should be enhanced. This potential positive benefit was not picked up in the SA.	Comments are noted. Consider including a requirement that footpath connections are enhanced as part of this development.
Core11	SALPO26	Policy 38 - Smaller Kidderminster Sites	Policy 38 should include the identification of small areas for development in accordance with Adopted Core Strategy policies CP07, CP13 and CP14. These areas should be shown on a map.	The document refers to Adopted Core Strategy Policies CP07, CP13 and CP14 as being relevant to these sites and any development on these sites will need to meet the requirements of these policies.
Campaign to Protect Rural England	SALPO201	Policy 38 - Smaller Kidderminster Sites	Requirement that sites are redundant should be precondition for development. Suggest cross-reference to CP07. However this is not relevant to the Chester Road site. At Rifle Range site, policy should require some retail provision. Suggest cross-reference to CP11 is desirable. Would separate policies not be simpler?	Comments are noted. The sites are not considered large or complex enough to warrant separate policies. Both the Aylmer Lodge and Northumberland Avenue sites make reference to the sites becoming surplus to requirements once the new facility at Kidderminster Hospital is operational. Paragraph 12.8 refers to the need to retain retail provision at the Rifle Range Shops site.
Environment Agency	SALPO276	Policy 38 - Smaller Kidderminster Sites	Chester Road South Service Station This site is located on a principal aquifer and total protection zone. Given the former use and industrial history of the sites there is the high potential for land contamination issues. Therefore we would want to ensure that such issues are adequately addressed and the building/drainage construction/design is appropriate. This is not specifically mentioned in the	Comments are noted. It is proposed to make stronger references to Policy CP01 of the Core Strategy within the Site Allocations Document to ensure that land contamination is fully considered in any development proposals. With regards to issues such as drainage design and construction etc, it is considered that these would be picked up

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			policies.	via the Development Control process. However, the Council will consider whether to make further reference to practice guidance where appropriate.
Campaign to Protect Rural England	SALPO202	Paragraph 12.6	Community Housing Group should be treated the same as any other developer. Developer should be encouraged to expand site to include surrounding available land. Need to ensure that community centre is redundant under Policy CP07.	Comments are noted. Land to the rear of the site is to be retained as open space and not developed.
Campaign to Protect Rural England	SALPO203	Paragraph 12.8	The requirement for continued retail provision as part of a redevelopment should be an explicit part of the policy, not merely contained in explanatory text.	Comments are noted.
Mrs P Harries	SALPO32	Policy 39 - Bridge Street Basins Link - (SAL.STC.1)	Bridge Street - Concern visitors' vehicles will be indiscriminately parked around waterfront view. The basins need parking allocated for visitors.	Comments are noted. This will be considered further as more detailed proposals emerge and is also considered in more detail within the Bridge Street Basins SPD.
British Waterways	SALPO196	Policy 39 - Bridge Street Basins Link - (SAL.STC.1)	BW welcomes requirement to open up basin views and enhance the basins. It is important for views to be optimised. Basins are valuable part of local heritage.	Comments are noted and support is welcomed.
Environment Agency	SALPO277	Policy 39 - Bridge Street Basins Link - (SAL.STC.1)	This site is located on a principal aquifer and total protection zone. Given the former use and industrial history of the sites there is the high potential for land contamination issues. Therefore we would want to ensure that such issues are adequately addressed and the building/drainage construction/design is appropriate. This is not specifically mentioned in the policies.	Comments are noted. This site is subject to a site specific SPD, which contains policies on contaminated land (ENV.1), Flood Risk (ENV.2) and a number of design policies.
Campaign to	SALPO204	Policy 40 - Phase	Once again a precondition that the sites are redundant	Comments are noted. The replacement

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Protect Rural England		1: Tan Lane - (SAL.STC.2.1)	in that the existing uses are (or will simultaneously be) provided for elsewhere is needed. This is to some extent covered by the final paragraph, but a cross-reference to Core Strategy Policy CP07 would be useful.	school is currently under construction.
West Mercia Police	SALPO252	Policy 40 - Phase 1: Tan Lane - (SAL.STC.2.1)	<p>We have been working closely with the County Council in relation to the Tan Lane and County Buildings site. There is agreement in principle that the library, health centre, police station coroners court need a new purpose-built facility. These discussions are still at a preliminary stage. The Fire Station will remain at its current site. Developer contributions will be required to finance the new facility and upgrade the fire station. We recommend that the policy is amended as follows:</p> <p>Phase 2: County Buildings - (SAL.STC.2.2) <i>Proposals for this site should provide for a suitable mix of uses including:</i></p> <ul style="list-style-type: none"> <i>i. Residential</i> <i>ii. Community uses (D1, including police and fire services)</i> <i>iii. Commercial Uses (offices)</i> <p><i>The future redevelopment of this site should make compensatory provision for existing community uses affected and for their expansion commensurate with development growth in Stourport-on-Severn.</i></p>	Comments are noted. The provision of adequate community facilities within Stourport-on-Severn will need to be a primary consideration for the redevelopment of this site.
Environment Agency	SALPO279	Policy 40 - Phase 1: Tan Lane -	This site is located on a principal aquifer and total protection zone. Given the former use and industrial	Comments are noted. It is proposed to make stronger references to Policy CP01 of the

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
		(SAL.STC.2.1)	history of the sites there is the high potential for land contamination issues. Therefore we would want to ensure that such issues are adequately addressed and the building/drainage construction/design is appropriate. This is not specifically mentioned in the policies.	Core Strategy within the Site Allocations Document to ensure that land contamination is fully considered in any development proposals. With regards to issues such as drainage design and construction etc, it is considered that these would be picked up via the Development Control process. However, the Council will consider whether to make further reference to practice guidance where appropriate.
Mrs P Harries	SALPO35	Policy 41 - Civic Centre - (SAL.STC.3)	What will happen to the Civic Centre?	The policy for the Civic Centre will be amended following consultation responses and the final version will be set out within the Publication document.
Campaign to Protect Rural England	SALPO205	Policy 41 - Civic Centre - (SAL.STC.3)	Once again a precondition that the sites are redundant in that there existing uses are (or will simultaneously) be provided for elsewhere is needed. This is to some extent covered by the final paragraph, but a cross-reference to Core Strategy Policy CP07 would be useful.	Comments are noted. CP07 is listed as one of the relevant Adopted Core Strategy policies.
Mrs P Harries	SALPO34	Policy 42 - Swan Hotel and Working Men's Club - (SAL.STC.4)	Concerned about the Swan Hotel collapsing and injuring passers-by. Who is paying for its renovation?	Comments are noted. Any renovation work carried out to the building would need to be funded by the owner or a developer.
Campaign to Protect Rural England	SALPO206	Policy 42 - Swan Hotel and Working Men's Club - (SAL.STC.4)	The bowling green is a sporting facility. If lost, equivalent provision elsewhere will be needed.	Comments are noted. Consider including a reference to replacement sports facilities although this is covered by PPG17.
Natural England	SALPO61	Policy 44 - Carpets	We welcome the proposed treatment of the River	Support is noted and welcomed.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
		of Worth - (SAL.EA.1)	Stour, which is a valuable green infrastructure corridor and designated as a Special Wildlife Site.	
Worcestershire Wildlife Trust	SALPO146	Policy 44 - Carpets of Worth - (SAL.EA.1)	The Trust welcomes the intent of this policy and particularly endorses sub-section v) of section one.	Comments are noted and support is welcomed.
Environment Agency	SALPO280	Policy 44 - Carpets of Worth - (SAL.EA.1)	<p>We would wish to see a reference to the naturalisation of the River Stour including cutting down the sheet piling and re-grading the bank to produce a more natural river corridor. Also a reference could be made to flood risk betterment within policy 44 and paragraph 14.3, which could be achieved through the re-profiling of the river bank and the lowering of ground levels in areas adjacent to the river. The potential for river restoration could also help to deliver WFD objectives. These matters and the inclusion of a 10m buffer strip have been discussed and proposed as part of the previous planning applications for this site.</p> <p>In relation to point vi. flood storage compensation must be provided for the new bridge crossing prior to the works commencing on site, to ensure there are no adverse impacts on flood risk as a result of the proposal.</p> <p>The site is located on a principal aquifer and total protection zone, with shallow groundwater. Given the industrial history of the site there is the high potential for land contamination issues. Therefore we would want to ensure that such issues are adequately addressed and the building/drainage construction/design is appropriate. This is not</p>	Comments are noted. The policy is considered to be generally consistent with the planning permissions currently in place for this area. Issues such as those highlighted have been dealt with through the Development Control process and agreed with the EA. Consider potential re-wording to reflect the issues identified and agreed through the Development Control process.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			specifically mentioned in the policy and this should be included. However, contaminated land issues have been discussed and are currently being addressed through the planning process	
Natural England	SALPO62	Policy 45 - Cheapside - (SAL.EA.2)	We welcome the requirement to incorporate and enhance the Rivers Severn and Stour.	Support is noted and welcomed.
Worcestershire Wildlife Trust	SALPO147	Policy 45 - Cheapside - (SAL.EA.2)	The Trust is pleased to support this policy and in particular references to the need to enhance the rivers Stour and Severn given in sub-section c).	Comments are noted and support is welcomed.
Environment Agency	SALPO281	Policy 45 - Cheapside - (SAL.EA.2)	<p>We support the inclusion of point C and D of policy 45. In achieving these points, we would wish to see consideration to setting any new buildings further back from the river to provide a greater easement/buffer strip in enhancing the river corridor and providing flood risk betterment.</p> <p>The site is located on a principal aquifer and total protection zone, with shallow groundwater. Given the industrial history of the site there is the high potential for land contamination issues. Therefore we would want to ensure that such issues are adequately addressed and the building/drainage construction/design is appropriate. We note that this has been specifically mentioned in Policy 45.</p>	<p>Comments are noted and support is welcomed.</p> <p>Comments are noted. It is proposed to make stronger references to Policy CP01 of the Core Strategy within the Site Allocations Document to ensure that land contamination is fully considered in any development proposals. With regards to issues such as drainage design and construction etc, it is considered that these would be picked up via the Development Control process. However, the Council will consider whether to make further reference to practice guidance where appropriate.</p>
Natural England	SALPO63	Policy 46 - Parsons Chain - (SAL.EA.3)	We welcome the requirement to incorporate SuDS and GI linking to Hartlebury Common and the River Stour.	Support is noted and welcomed.
Worcestershire	SALPO150	Policy 46 - Parsons	The Trust welcomes this policy and in particular is	Comments are noted and support is

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Wildlife Trust		Chain - (SAL.EA.3)	pleased to endorse sub-sections e) and f).	welcomed.
Environment Agency	SALPO283	Policy 46 - Parsons Chain - (SAL.EA.3)	The site is located on a principal aquifer and total protection zone, with shallow groundwater. Given the industrial history of the site and previous use (garage at Worcester Road & Baldwin Road) there is the high potential for land contamination issues. Therefore we would want to ensure that such issues are adequately addressed and the building/drainage construction/design is appropriate. We note that this is specifically mentioned in Policy 46 but not in Policy 47 or 48.	Comments are noted. With regards to the potential contamination issues, these will be explored further, including greater links to Core Strategy Policy CP01. Although this is referenced under relevant Core Strategy Policies at the final section of the RJ.
Environment Agency	SALPO284	Policy 47 - Worcester Road Car Garages - (SAL.EA.4)	The site is located on a principal aquifer and total protection zone, with shallow groundwater. Given the industrial history of the site and previous use (garage at Worcester Road & Baldwin Road) there is the high potential for land contamination issues. Therefore we would want to ensure that such issues are adequately addressed and the building/drainage construction/design is appropriate. We note that this is specifically mentioned in Policy 46 but not in Policy 47 or 48.	Comments are noted. It is proposed to make stronger references to Policy CP01 of the Core Strategy within the Site Allocations Document to ensure that land contamination is fully considered in any development proposals. With regards to issues such as drainage design and construction etc, it is considered that these would be picked up via the Development Control process. However, the Council will consider whether to make further reference to practice guidance where appropriate.
Humphries M	SALPO100	Paragraph 14.27	Basic premise of proposed policy framework is flawed. Whilst site may be considered as a whole by drawing a notional boundary, the delivery of the site as a whole prior to development starting is not a credible option. There are at least 13 different owners involved and not all will aspire to redevelopment. Without tacit agreement of all parties involved, area cannot be seen as a comprehensive development site.	Whilst it is acknowledged that there are plots of land within the wider site which will not come forward for redevelopment, the area has been presented as one policy area in order to ensure that any development which comes forward on the four sites identified is part of a comprehensive masterplan rather than a piecemeal approach.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Natural England	SALPO64	Policy 48 - Baldwin Road - (SAL.EA.5)	We support the GI requirements expressed in points b, c and d.	Support is noted and welcomed.
Worcestershire Wildlife Trust	SALPO153	Policy 48- Baldwin Road - (SAL.EA.5)	The Trust is pleased to support the thrust of this policy and welcomes the inclusion of sub-sections b), c), and d).	Comments are noted and support is welcomed.
Humphries M	SALPO96	Policy 48 - Baldwin Road - (SAL.EA.5)	<p>Will the proposed masterplan cover all the land within the red line? If so, this will include a number of properties which have yet to come forward as deliverable. It would be unrealistic to produce a masterplan which requires delivery of entire site to allow development to progress and thus discourage development of those areas which are available and deliverable.</p> <p>Policy 48 wording is incorrect. There is no Public Open Space - the BW owned land has limited public access and recent ecological surveys have shown strong badger presence. Access to the public would not be in the best interest.</p>	<p>Comments are noted. However, it is considered that a holistic approach is best although there may be pockets of land which may not be redeveloped.</p> <p>The reference to 'public open space' at criteria b is incorrect and should refer to 'urban open space'. Inclusion of this site in any overall scheme will need to take into account results from ecological surveys.</p>
British Waterways	SALPO197	Policy 48 - Baldwin Road - (SAL.EA.5)	Welcomes requirement to provide green links to canal corridor and ensure development has no adverse impact on Canal Conservation Area	Comments are noted and support is welcomed.
Environment Agency	SALPO285	Policy 48 - Baldwin Road - (SAL.EA.5)	The site is located on a principal aquifer and total protection zone, with shallow groundwater. Given the industrial history of the site and previous use (garage at Worcester Road & Baldwin Road) there is the high potential for land contamination issues. Therefore we would want to ensure that such issues are adequately addressed and the building/drainage construction/design is appropriate. We note that this is	Comments are noted. It is proposed to make stronger references to Policy CP01 of the Core Strategy within the Site Allocations Document to ensure that land contamination is fully considered in any development proposals. With regards to issues such as drainage design and construction etc, it is considered that these would be picked up

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			specifically mentioned in Policy 46 but not in Policy 47 or 48.	via the Development Control process. However, the Council will consider whether to make further reference to practice guidance where appropriate.
Key Homes (Midlands) Limited	SALPO340	Policy 48 - Baldwin Road - (SAL.EA.5)	Key Homes (Midlands) Ltd are in support of the proposal to redevelop the greater area of Baldwin Road for residential development with some business use. Part of the land owned by Key Homes (Midlands) Ltd is currently cleared and is available and deliverable for residential development. The greater area of Baldwin Road is in a minimum of 13 separate land ownerships. The majority of these are on small areas of land that could serve to blight a comprehensive redevelopment. We do not agree with the proposal in para. 14.35 concerning the pro rata application of the social housing threshold across the greater site. This will be detrimental to the owners of smaller areas of land and will further stifle redevelopment. Currently there is no accessible area of public open space within the greater site. The Staffordshire and Worcestershire Canal Conservation Area abuts the site but lies outside the notional greater site boundary. Due to the number of land ownerships the provision of open space within the greater site could place an unnecessary burden upon a single landowner further blighting the greater development of the area. A plan is attached demonstrating that the cleared area of land in the ownership of Key Homes (Midlands) Limited can be developed independently to provide 9 no residential units incorporating its own adopted access off Baldwin Road. This in turn would service subsequent	<p>Comments are noted. However, it is considered that a holistic approach is best although there may be pockets of land which may not be redeveloped.</p> <p>The reference to 'public open space' at criteria b is incorrect and should refer to 'urban open space'. Inclusion of this site in any overall scheme will need to take into account results from ecological surveys.</p> <p>Further consideration needs to be given to the application of affordable housing policy in this location and its impact on viability.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			development of additional adjacent smaller sites. Consideration has also been given to the future provision of a footpath /cycle way link to the north by an extension of this access road. A 'Guidance Plan' has been produced providing evidence that this area of land can be developed independently and incorporated into the greater development of Baldwin Road.	
Humphries M	SALPO97	Paragraph 14.29	Proposal to consider development of individual parcels of land within wider site subject to them contributing to wider area is commendable. This would provide the pump priming required on this fragmented site. However, the mixed use element is questionable. Whilst existing mixed uses may be viable there is no justification for new commercial development at this location. If a mixed-use element is needed, would suggest it is located at Gilgal end of site to avoid conflict with residential uses.	Comments are noted and support is welcomed. The policy states that the mix of uses should be predominantly residential. The masterplan approach will ensure that the mix of uses does not result in conflict between neighbouring uses.
Humphries M	SALPO98	Paragraph 14.34	Allocation of 'wider site' for housing is commended but question whether statement that 'wider site' is deliverable and available. No evidence to support this. Masterplan will have to take into account possibility that several of the smaller parcels of land may not come forward for development, particularly the small commercial premises and existing residential properties.	Comments are noted. A masterplan approach will be required as a number of smaller sites are available and these should not be developed in isolation. It is acknowledged that there are some parcels of land i.e, existing residential units and existing businesses which may not come forward at all or may come forward later in the plan period.
Humphries M	SALPO99	Paragraph 14.35	Application of affordable housing thresholds pro-rata to entire site will prove further disincentive to both developers and smaller stakeholders. Site likely to remain in fragmented ownership as insufficient	Comments are noted. However, it is considered that a holistic approach is best although there may be pockets of land which

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			financial incentive for major developer to acquire the smaller sites. 3 of the 4 sites listed at 14.28 could each be developed out and deliver affordable housing in accordance with adopted threshold. Any pro-rata application of threshold would result in reduced amount of affordable housing on these larger sites.	may not be redeveloped. Further consideration needs to be given to the application of affordable housing policy in this location and its impact on viability.
Sport England	SALPO79	Policy 49 - Morgan Technical Ceramics and former Midland Industrial Plastics Site (SAL.WS.1)	Sport England is concerned that part of the site is designated playing fields and will oppose any development that would lead to the loss of, or prejudice the use of, all or part of the playing field without meeting at least one of the specific criteria identified in the Sport England Playing Pitch Policy.	Comments are noted. The policy includes a clause which requires the existing playing pitch provision to be retained or compensatory provision to be provided. Consider including reference to the Sport England Playing Field policy within the policy.
Morgan Advanced Ceramics Ltd	SALPO102	Policy 49 - Morgan Technical Ceramics and former Midland Industrial Plastics Site (SAL.WS.1)	Request rewording of criteria 'b' as follows: "Ensure that scheme design and development demonstrate that appropriate noise mitigation measures, including layout, building design, construction, phasing and mix of uses ensure compatibility of uses within this location."	Re-word as suggested.
Bovale Limited	SALPO212	Policy 49 - Morgan Technical Ceramics and former Midland Industrial Plastics Site (SAL.WS.1)	Supports policy 49 insofar as it advocates redevelopment of the former Midland Industrial Plastics site for residential development and elderly care facility development, however, raises concern over the conjoining of the site with the adjacent Morgan Advanced Ceramics site into a single site with a single policy. Bovale, the site owners, have previously tried to enter into negotiations with Morgan Advanced Ceramics about a holistic development across the two sites, however, the planning history shows that the two sites have been treated separately	Comments are noted, however, it is considered that in order to achieve the best quality design and development from the sites, these sites should be addressed as a single development site with an overarching policy.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>and the sites currently 'read' as two separate parcels of land.</p> <p>Raises concerns about difficulty complying with the final sentence of the policy because of an existing planning permission on the Morgan Advanced Ceramics site.</p> <p>Supports paragraphs 15.4, 15.5 and 15.7 which offer a fair reflection as to the site's history through the development plan process and its suitability for development.</p> <p>Acknowledge that office development could be used as a noise buffer between the Morgan Advanced Ceramic factory and residential development however, it is considered that this should not be a mandatory requirement as market demands may render the site unviable and undeliverable.</p> <p>Proposed Changes Would like to see the Morgan Advanced Ceramics site and the Midland Industrial Plastics site divided into two separate sites with their own policies.</p>	
Environment Agency	SALPO286	Policy 49 - Morgan Technical Ceramics and former Midland Industrial Plastics Site (SAL.WS.1)	The site is located on a principal aquifer and total protection zone. Given the industrial history of the site there is the high potential for land contamination issues. Therefore we would want to ensure that such issues are adequately addressed and the building/drainage construction/design is appropriate. We note that this is specifically mentioned in Policy	Comments are noted. It is proposed to make stronger references to Policy CP01 of the Core Strategy within the Site Allocations Document to ensure that land contamination is fully considered in any development proposals. With regards to issues such as drainage design and construction etc, it is

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			49.	considered that these would be picked up via the Development Control process. However, the Council will consider whether to make further reference to practice guidance where appropriate.
Morgan Advanced Ceramics Ltd	SALPO101	Paragraph 15.6	The measures by which MAC's operations must be protected from potential complaints from future residents of adjoining housing development must be made clear to any potential developers at design stage. Measures include additional sound insulation to walls and windows and no balconies or opening windows to rooms at risk of noise nuisance. Any 'barrier block' of non-noise sensitive uses proposed must be substantially completed prior to occupation of any noise sensitive development. Scheme layout must also avoid 'noise corridors' being created.	Comments are noted. Clauses 'a' and 'b' of the policy will ensure that the future operation of the MAC site is not prejudiced by development on the wider site.
Natural England	SALPO65	Policy 50 - Lucy Baldwin Unit - (SAL.WS.2)	We support the requirements to provide GI links and access.	Support is noted and welcomed.
Owners of Lucy Baldwin Unit	SALPO214	Policy 50 - Lucy Baldwin Unit - (SAL.WS.2)	Object to retention of locally listed buildings on site as this would make comprehensive redevelopment difficult as they are scattered around site and often linked by modern extensions. Originally designed as a hospital, the current condition, design, layout and physical nature of these buildings do not lend themselves to conversion and incorporation into a quality residential development. Do not consider buildings to merit local listing. Wish to see comprehensive redevelopment which will allow links to adjacent Memorial Park.	Comments are noted. A number of buildings on the site have been Locally Listed and as such, the policy position is to retain these buildings.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Environment Agency	SALPO287	Policy 51 - Smaller Stourport-on-Severn Sites	<p>Robbins Depot</p> <p>The site is located on a principal aquifer and total protection zone. Given the previous use of the site there is high potential for land contamination issues. Therefore we would want to ensure that such issues are adequately addressed and the building/drainage construction/design is appropriate.</p>	<p>Comments are noted. It is proposed to make stronger references to Policy CP01 of the Core Strategy within the Site Allocations Document to ensure that land contamination is fully considered in any development proposals. With regards to issues such as drainage design and construction etc, it is considered that these would be picked up via the Development Control process. However, the Council will consider whether to make further reference to practice guidance where appropriate.</p>
West Mercia Police	SALPO272	Policy 52 - Load Street Redevelopment Area - (SAL.B.1)	<p>Do not dispute the economic and social benefits of expanding evening/night-time economy in Bewdley. However, there is direct relationship between the evening economy and number of incidents we deal with. This recognised both locally (Community Strategy and Community Safety Partnership) and nationally with violence and anti-social behaviour disproportionately concentrated amongst licensed premises and those associated with evening/night-time economy. We request that Policy 52(f) is strengthened to recognise this as follows:</p> <p><i>provide a wider range of evening economy activities to attract a broader range of people, whilst ensuring that there is no adverse impact in terms of community safety or crime and disorder.</i></p> <p>This will be consistent with policy 10.</p>	<p>Comments are noted. Amending policy wording as suggested.</p>
West Mercia	SALPO263	Policy 52 - Load	<p>HWFRS have been in discussions with the Primary</p>	<p>Comments are noted, however community</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Police		Street Redevelopment Area - (SAL.B.1)	<p>Care Trust (PCT) regarding the redevelopment of its site and the future of the existing Bewdley Fire Station. Due to negotiations being at an early stage it not possible to confirm in these representations whether HWFRS will remain at its existing station, with improvements, or move to a new one off-site. However, it is confirmed that developer contributions may be required from the PCT. In light of this, WMP and HWFRS request that the current statement in paragraph 17.4 regarding the provision of community facilities be given policy status: -</p> <p><i>Policy 52</i> <i>Load Street Redevelopment Area - (SAL.B.1)</i> <i>Within the Load Street Redevelopment area a mixed use redevelopment will be sought, incorporating:</i></p> <ul style="list-style-type: none"> <i>i. Community uses (D1, including HWFRS)</i> <i>ii. Residential (C3)</i> <i>iii. Small scale A1 retail to meet local needs</i> <p>Redevelopment of the site will need to provide community facilities, including the fire station, either on-site or through compensatory provision. <i>Proposals for this site should...</i></p>	facilities are safeguarded through policy CP07.
English Heritage	SALPO353	Bewdley - Smaller Sites	<p>Whilst the heritage sensitivities have been picked up in the specific policies and text, relevant information from the HER should also be incorporated. Encouragement for the repair and reuse of the Former Workhouse is welcomed.</p>	Comments are noted. Support is welcomed. Consider including the HER information within the Publication document or clarifying that this information has not been included.
Watkins R A	SALPO78	Policy 53 - Smaller Bewdley Sites	<p>The available space at Lax Lane (SAL.B.2), after demolition of the WRVS building, should be for <u>allocated residents only parking</u> . This would allow</p>	Comments are noted. This will be considered further when detailed plans come forward for the site.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<u>some</u> of the on-street parking in Lax Lane to be removed and this would improve safety and townscape.	
Environment Agency	SALPO288	Policy 53 - Smaller Bewdley Sites	The site is located on a principal aquifer and total protection zone. Given the location of the site within the historical centre of Bewdley and the former use, there is the potential for land contamination issues. Therefore we would want to ensure that such issues are adequately addressed and the building/drainage construction/design is appropriate. A desk study would therefore be required in the first instance. It is noted that it is hoped that the building is to be retained therefore any site investigation requirements would have to be designed with this in mind.	Comments are noted. It is proposed to make stronger references to Policy CP01 of the Core Strategy within the Site Allocations Document to ensure that land contamination is fully considered in any development proposals. With regards to issues such as drainage design and construction etc, it is considered that these would be picked up via the Development Control process. However, the Council will consider whether to make further reference to practice guidance where appropriate.
Davies Mrs E	SALPO22	Paragraph 7.17	Delighted to see former workhouse as a given priority. Much needed.	Support is and noted and welcomed.
Banner Homes Midlands Ltd	SALPO93	Paragraph 18.1	Consider housing policy for rural areas is unduly restrictive especially in relation to Clows Top. Would like to see Clows Top Garage site redeveloped for housing in preference to greenfield site being promoted in South Worcestershire Development Plan. This would help delivery of sewer improvements to village and allow for affordable housing delivery on adjacent site at The Terrace.	Comments are noted. Policy is in accordance with the Development Strategy set out within the Adopted Core Strategy (2010).
Moss K	SALPO191	Paragraph 18.1	We believe that in certain key rural settlements such as Clows Top there are also regeneration opportunities which will help sustain local facilities such as local stores and bus routes, as well as facilitating enhanced infrastructure provision for the	Comments are noted. The figures in DS01 are indicative figures to support the housing trajectory. Consider extending the allocation at Clows Top whilst being mindful of cross-boundary issues and housing need.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			wider community.	
Mellor P	SALPO6	Paragraph 18.2	<p>Agree that provision of housing be limited in order to safeguard the landscape character and not detract from urban regeneration. Proposal for 37 houses at Blakedown does not achieve this.</p> <p>Local need is mainly for downsizing and in many cases this does not require affordable. Any affordable housing should be for local needs meaning those residing in the Parish or with strong links.</p> <p>Questions the validity of the Housing Needs Survey and why there is more need now than when Swan Close was developed. Survey does not distinguish between need and desire, it is not means tested and is therefore fundamentally flawed.</p> <p>Increase in the housing stock will impact on village services, particularly the primary school.</p> <p>Development should not provide strong visual linkages to the adjacent open space as this would be intrusion into the Green Belt.</p> <p>Any development should have regard to:</p> <ul style="list-style-type: none"> • increased traffic • access issues onto Belbroughton Road and increased volumes using Birmingham Road junction • affect on Forge Lane residents/access • loss of on street parking for Belbroughton 	<p>Comments are noted. The site would need to deliver the level of affordable housing identified through the Parish Housing Needs Survey. This site has been identified as the most suitable site for this purpose in conjunction with the Parish Council and has been earmarked for future housing needs through previous Adopted Local Plans. In order to deliver the affordable housing, it may be necessary to allow some enabling market housing to make the scheme financially viable. The affordable housing will be for existing residents or those with a family or employment connection to area. This will be a condition of planning approval.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>Road residents</p> <ul style="list-style-type: none"> • effect on Green Belt - intrusion into countryside, noise and light pollution • potential water runoff into the Pools • effect on existing services (sewerage capacities, etc) • effect on Primary School intake • continued pressure on Haybridge School • disregard of Parish Plan • disregard of Housing Needs Survey • loss of ribbon development pattern • loss of amenity for neighbouring residents - intrusion into gardens 	
Mellor Mrs F	SALPO121	Paragraph 18.2	<p>Agree that provision of housing be limited in order to safeguard the landscape character and not detract from urban regeneration. Proposal for 37 houses at Blakedown does not achieve this.</p> <p>Local need is mainly for downsizing and in many cases this does not require affordable. Any affordable housing should be for local needs meaning those residing in the Parish or with strong links.</p> <p>Questions the validity of the Housing Needs Survey and why there is more need now than when Swan Close was developed. Survey does not distinguish between need and desire, it is not means tested and is therefore fundamentally flawed.</p> <p>Increase in the housing stock will impact on village</p>	<p>Comments are noted. The site would need to deliver the level of affordable housing identified through the Parish Housing Needs Survey. This site has been identified as the most suitable site for this purpose in conjunction with the Parish Council and has been earmarked for future housing needs through previous Adopted Local Plans. In order to deliver the affordable housing, it may be necessary to allow some enabling market housing to make the scheme financially viable. The affordable housing will be for existing residents or those with a family or employment connection to the area. This will be a condition of planning approval.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>services, particularly the primary school.</p> <p>Development should not provide strong visual linkages to the adjacent open space as this would be intrusion into the Green Belt.</p>	
Natural England	SALPO66	Policy 54 - Blakedown Nurseries - (SAL.RS.1)	We welcome the recognition of the need to restrict surface water run-off into the Forge Pool. This is especially important due to the presence of Hurcott & Podmore Pools SSSI a short distance downstream via the Churchill and Blakedown Valleys Special Wildlife Site. For this reason we recommend making it a requirement in the policy.	Support is noted and welcomed. Consider including within the policy a requirement to restrict surface water run-off into Forge Pool.
Trustees of J R Bent Deceased & Mrs M L Bent	SALPO216	Policy 54 - Blakedown Nurseries - (SAL.RS.1)	The former Blakedown Nurseries site was a horticultural business with offices, packing sheds, glasshouses and polythene tunnels. Closed in 1998. Since then site has suffered from vandalism. Site is blot on landscape and devalues area. Village is well served by facilities and we the owners support a proposal by Barratts to develop the site for housing.	Comments are noted.
Churchill and Blakedown Parish Council	SALPO103	Policy 54 - Blakedown Nurseries - (SAL.RS.1)	<p>Parish Council welcomes development which accords with the Churchill and Blakedown Parish Plan and that housing development should meet local needs in accordance with the Adopted Core Strategy.</p> <p>Parish Council is against residential/commercial development sites in rural areas such as those in Hagley being put forward by Bromsgrove District Council which will have a detrimental impact on Churchill and Blakedown. The Parish Council would object to any similar development in this part of Wyre</p>	Comments are noted and support is welcomed.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			Forest District.	
Worcestershire Wildlife Trust	SALPO154	Policy 54 - Blakedown Nurseries - (SAL.RS.1)	The Trust is pleased to note the inclusion of sub-section c) but would recommend that it be strengthened to a requirement to provide buffering and enhancement to the SWS in line with wider policy aspirations and Government guidance.	Comments are noted. Consider amending policy to require buffering and enhancement to the SWS.
Campaign to Protect Rural England	SALPO207	Policy 54 - Blakedown Nurseries - (SAL.RS.1)	<p>Need Experience in Bromsgrove District has shown that the methodology used in housing needs surveys is poor and does not adequately identify local needs arising within the community. Policy 54 needs to be subject to a precondition of the applicant demonstrating that a local need for affordable housing exists. If the scheme also includes market housing, the need for this also needs to be robustly justified (see RSS policy RR1 and CF2 and its definition of "Local Needs"). Consider that housing needs survey demonstrates need for just 4 affordable houses, a need exists for market housing in form of bungalows for elderly and it may be desirable to provide some general market housing to help fund affordable.</p> <p>Housing Allocations Housing criteria do not seem to be robust enough to ensure local connection (see Bromsgrove criteria for allocation of affordable housing developed in rural areas).</p> <p>Site As a former nursery this is an agricultural site and not a typical brownfield site. Development along</p>	Comments are noted. Any affordable housing coming forward at the site will be for existing residents or those with a family or employment connection to the area. This will be a condition of planning approval. Market housing cannot be restricted in the same way.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>Belbroughton Road consists of houses with long rear gardens. Much of Blakedown is enclosed common. Opportunity should be sought to integrate open space provision within the development with adjacent community land.</p> <p>Strategy There are few housing sites identified in villages. Important that site development is phased over the whole plan period so there is not pressure for another site in the village later on in the plan period. Suggest agree masterplan for whole site and divide into 3 distinct phases. Refer to Policy RR1c of the RSS - local needs is defined as excluding demand from those moving into the area.</p>	
Butler Mrs S	SALPO166	Policy 54 - Blakedown Nurseries - (SAL.RS.1)	<p>Agree that provision of housing be limited in order to safeguard the landscape character and not detract from urban regeneration.</p> <p>The proposal for 37 houses on Blakedown Nurseries does not safeguard the landscape character.</p> <p>Local affordable need is predominantly for downsizing by the more elderly residents.</p> <p>This does not necessarily require affordable in many instances.</p> <p>Any affordable housing should be "local" i.e. for those residing within the Parish and with strong connections</p>	<p>Comments are noted. The site would need to deliver the level of affordable housing identified through the Parish Housing Needs Survey. This site has been identified as the most suitable site for this purpose in conjunction with the Parish Council and has been earmarked for future housing needs through previous Adopted Local Plans. In order to deliver the affordable housing, it may be necessary to allow some enabling market housing to make the scheme financially viable.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>to the Parish</p> <p>What is the validity and status of the Housing Needs Survey?</p> <p>Why is there so much more "need" now compared to when Swan Close was developed?</p> <p>The Survey does not distinguish between "need" and "desirability", is not means tested and therefore is a fundamentally flawed piece of research</p> <p>Any increase in the housing stock will impact on village services, particularly the Primary School.</p> <p>Development should not provide strong visual linkages to the adjacent open space as this would be intrusion into the Green Belt.</p> <p>Any development should have regard to:</p> <ul style="list-style-type: none"> • increased traffic • access issues onto Belbroughton Road and increased volumes using Birmingham Road junction • affect on Forge Lane residents/access • loss of on street parking for Belbroughton Road residents • effect on Green Belt - intrusion into countryside, noise and light pollution • potential water runoff into the Pools • effect on existing services (sewerage capacities, etc) 	

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<ul style="list-style-type: none"> • effect on Primary School intake • continued pressure on Haybridge School • disregard of Parish Plan • disregard of Housing Needs Survey • loss of ribbon development pattern • loss of amenity for neighbouring residents - intrusion into gardens 	
Benson A	SALPO172	Policy 54 - Blakedown Nurseries - (SAL.RS.1)	<ul style="list-style-type: none"> • Support development but must be appropriate and what locals want • increased traffic may need calming measures • appropriate junction to be provided • parking issues for houses opposite site • have regard to parish plan • have regard to housing needs survey - most need was for downsizing • affordable housing should be for local residents only • sustainability - reduced services • effect on local school • contrary to pattern of development i.e. ribbon • effect on adjoining Green Belt and Millennium Green • effect on neighbours • increased light and noise pollution • concerns re sewerage capacity • concerns re surface run-off into pools and brook 	Concerns are noted.
Barratt Homes	SALPO300	Policy 54 - Blakedown Nurseries - (SAL.RS.1)	Site boundary shown on page 168 is incorrect	Comments are noted. Boundary will be amended.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Barratt Homes	SALPO312	Policy 54 - Blakedown Nurseries - (SAL.RS.1)	The development of the site will be in line with government policies relating to sustainable economic growth. This land will add to the portfolio of residential sites across the District, is in a highly sustainable location, will produce job creation/retention in the housing sector and will assist in helping to maintain vital Village services/facilities such as shops and community uses.	Comments are noted
Barratt Homes	SALPO314	Policy 54 - Blakedown Nurseries - (SAL.RS.1)	On street parking and traffic speeds on Belbroughton Road have been identified by the Parish Council and local residents as an issue. It is hoped the development of this site can go some way to address these existing problems whilst providing sufficient on site provision to maintain this improvement.	Comments are noted
Barratt Homes	SALPO317	Policy 54 - Blakedown Nurseries - (SAL.RS.1)	<p>Proposals for the Blakedown Nurseries site will follow the policy requirements relating to design, character, local distinctiveness, tree protection etc. Discussions are taking place with the Parish Council and local residents to identify concerns.</p> <p>The site is considered to be critical to the overall housing strategy and not a Rural Exception site. The small numbers of dwellings proposed on the rural sites is unlikely to detract from urban regeneration. Policy CP04 suggests 30% affordable housing in the rural areas. Viability assessment should only be needed if 30% cannot be met. Some local opposition to affordable housing on site.</p> <p>Proposed residential use will have less traffic impact than when used as commercial nursery and planning</p>	Comments are noted

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			obligations will provide benefits to whole village,	
Morris W	SALPO338	Policy 54 - Blakedown Nurseries - (SAL.RS.1)	Concerned about risk of losing on-road parking space on Belbroughton Road if site is developed and double yellow lines are painted opposite site entrance. Concerns are safety of unloading small children, road speed increasing as parked cars act as traffic calming measure, reduced house price if no parking space, lack of space for visitor parking. Assume if lose parking space outside house we will be compensated with dedicated or permit-based parking.	Comments are noted.
Morris W	SALPO339	Policy 54 - Blakedown Nurseries - (SAL.RS.1)	Concerned that new housing will mean lack of school spaces for local children already resident in village.	Comments are noted. However, the Local Education Authority have not raised any concerns relating to the potential allocation of the site.
Mellor P	SALPO159	Paragraph 18.3	<p>Questions why this is the preferred site. Suggests land at rear of Rectory - Grosvenor Hall's site as an alternative.</p> <p>Site is too large to be developed in its entirety to meet identified affordable housing need and the detrimental effect on Belbroughton Road, Forge Lane, the adjoining Green Belt and the effect on the village as a whole.</p>	The preferred site is the Area of Development Restraint which was taken out of the Green Belt in order to meet long-term housing need. The Parish Council and District Council have looked together at other sites and the Nurseries site is the only site large enough to meet the need identified through the Parish Housing Needs Survey. Whilst the site is too large to develop for a 100% affordable housing scheme it does offer the opportunity for enabling market housing to help deliver the level of affordable housing required.
Mellor R	SALPO115	Paragraph 18.3	Concerned that Blakedown School is at capacity and that development of family housing will diminish quality of educational provision in village.	Comments are noted. The Local Education Authority have been consulted at each stage of the document's development and have

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
				not raised any concerns regarding education provision.
Mellor Mrs F	SALPO122	Paragraph 18.3	<p>Questions why this is the preferred site. Suggests land at rear of Rectory or Grosvenor Hall's site as an alternative.</p> <p>Site is too large to be developed in its entirety to meet identified affordable housing need and development will have detrimental effect on Belbroughton Road, Forge Lane, the adjoining Green Belt and the village as a whole.</p>	The preferred site is the Area of Development Restraint which was taken out of the Green Belt in order to meet long-term housing need. The Parish Council and District Council have looked together at other sites and the Nurseries site is the only site large enough to meet the need identified through the Parish Housing Needs Survey. Whilst the site is too large to develop for a 100% affordable housing scheme it does offer the opportunity for enabling market housing to help deliver the level of affordable housing required.
Butler Mrs S	SALPO167	Paragraph 18.3	<p>Why is this the preferred site for affordable housing development?</p> <p>What other sites have been considered – land at rear of Rectory, Grosvenor Hall's site?</p> <p>The site is too large to be redeveloped in its entirety for the reasons stated above and the detrimental effect on Belbroughton Road, Forge Lane, the adjoining Green Belt and the effect on the village as a whole</p>	The preferred site is the Area of Development Restraint which was taken out of the Green Belt in order to meet long-term housing need. The Parish Council and District Council have looked together at other sites and the Nurseries site is the only site large enough to meet the need identified through the Parish Housing Needs Survey. Whilst the site is too large to develop for a 100% affordable housing scheme it does offer the opportunity for enabling market housing to help deliver the level of affordable housing required.
Mellor P	SALPO161	Paragraph 18.4	<p>It may be sustainable in terms of access to a shop and railway, but:</p> <ul style="list-style-type: none"> the retail offer is very limited; 	Comments are noted. However, the site is within 10 minutes walk of rail services to

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<ul style="list-style-type: none"> • bus services between Kidderminster and Hagley have recently been reduced; • there is no healthcare or other social benefit provision in Blakedown. <p>Support statement that <i>"Housing to meet local needs is one of the types of development which is identified as being appropriate within villages"</i></p> <p>Such housing provision should have regard to the needs identified at recent Parish and Consultation meetings which appear to be at odds with the results of the Housing Needs Survey.</p> <p>Housing should be for Parish residents or those with strong local connection to the Parish.</p>	<p>Hagley, Kidderminster and Birmingham.</p> <p>The affordable housing provided by the development will be allocated in accordance with the Council's local connections policy. However, any market housing provided on the site would be open market housing and could not be restricted to people with an existing connection to the Parish.</p>
Mellor R	SALPO116	Paragraph 18.4	<p>Does Blakedown have a housing need on this scale? With ageing population, it would make sense to provide bungalows to free up family housing in village. Older residents are also more likely to use local facilities. Traffic and parking in Belbroughton Road is already an issue. High density development would not fit with local area.</p>	<p>Comments are noted. The affordable housing element of the site will need to meet the demand identified through the Housing Needs Assessment and will be for existing residents or those with a family or employment connection to the area. This will be a condition of planning approval. However, the market element of the site cannot be restricted in the same way.</p> <p>suitable accommodation for elderly to free up family housing.</p>
Mellor Mrs F	SALPO123	Paragraph 18.4	It may be sustainable in terms of access to a shop and	Comments are noted. However, the site is

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>railway, but:</p> <ul style="list-style-type: none"> • the retail offer is very limited; • bus services between Kidderminster and Hagley have recently been reduced; • there is no healthcare or other social benefit provision in Blakedown. <p>Support statement that <i>"Housing to meet local needs is one of the types of development which is identified as being appropriate within villages"</i></p>	<p>within 10 minutes walk of rail services to both Hagley, Kidderminster and Birmnigham.</p>
Butler Mrs S	SALPO168	Paragraph 18.4	<p>It may be sustainable in terms of access to a shop and railway, but:</p> <p>the retail offering is very limited;</p> <p>bus services between Kidderminster and Hagley have recently been reduced;</p> <p>there is no healthcare or other social benefit provision in Blakedown.</p> <p>I support the statement that <i>"Housing to meet local needs is one of the types of development which is identified as being appropriate within villages"</i></p> <p>Such housing provision should have regard to the needs identified at recent Parish and Consultation meetings which appear to be at odds with the results of the Housing Needs Survey.</p> <p>Housing should be for Parish residents or those with strong local connection to the Parish</p>	<p>Comments are noted. However, the site is within 10 minutes walk of rail services to Hagley, Kidderminster and Birmingham.</p> <p>The affordable housing provided by the development will be for existing residents or those with a family or employment connection to the area. This will be a condition of planning approval. However, any market housing provided on the site would be open market housing and could not be restricted to people with an existing connection to the Parish.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Mellor P	SALPO162	Paragraph 8.5	The levels of anti social behaviour are low now that the landowner has properly secured the site.	Comments are noted.
Mellor Mrs F	SALPO124	Paragraph 18.5	The levels of anti social behaviour are low now that the landowner has properly secured the site.	Comments are noted.
Butler Mrs S	SALPO170	Paragraph 18.5	The levels of anti social behaviour are low now that the landowner has properly secured the site.	Comments are noted.
Mellor P	SALPO164	Paragraph 18.6	<p>The importance of screening the site from car park and Green conflicts with the intention in Policy 54 (d) that " <i>Development should provide strong pedestrian and, where possible, visual linkages to the adjacent open space</i>"</p> <p>The site should also be suitably screened from the paddocks and footpaths near Ladies Pool and Forge Pool to safeguard the Green Belt, not encroach, and protect the amenity of neighbouring residents on Forge Lane and Belbroughton Road who are at risk of being overlooked.</p> <p>For these reasons the existing building lines of Belbroughton Road should be retained and any new development should not extend beyond them.</p>	Comments are noted. Consider further when developing the Publication document.
Mellor R	SALPO117	Paragraph 18.6	Development must be sensitive to its location adjacent to Green Belt with main impact from footpaths and countryside to rear. Low density housing surrounds site and this should be reflected in any development.	Comments are noted.
Mellor Mrs F	SALPO129	Paragraph 18.6	The importance of screening the site from car park and Green conflicts with the intention in Policy 54 (d) that " <i>Development should provide strong pedestrian</i>	Comments are noted. Consider further when developing the Publication document.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p><i>and, where possible, visual linkages to the adjacent open space"</i></p> <p>The site should also be suitably screened from the paddocks and footpaths near Ladies Pool and Forge Pool to safeguard the Green Belt, not encroach, and protect the amenity of neighbouring residents on Forge Lane and Belbroughton Road who are at risk of being overlooked.</p> <p>For these reasons the existing building lines of Belbroughton Road should be retained and any new development should not extend beyond them.</p>	
Butler Mrs S	SALPO171	Paragraph 18.6	<p>The importance of screening the site from car park and Green conflicts with the intention in Policy 54 (d) that "<i>Development should provide strong pedestrian and, where possible, visual linkages to the adjacent open space"</i></p> <p>The site should also be suitably screened from the paddocks and footpaths near Ladies Pool and Forge Pool to safeguard the Green Belt, not encroach, and protect the amenity of neighbouring residents on Forge Lane and Belbroughton Road who are at risk of being overlooked.</p> <p>For these reasons the existing building lines of Belbroughton Road should be retained and any new development should not extend beyond them.</p>	Comments are noted. Consider further when developing the Publication document.
Marston's PLC c/o First City Ltd	SALPO7	Policy 55 - Smaller Rural Sites	Suggests that the Cookley ADR, off Kimberlee Avenue, be allocated for affordable local needs	Affordable housing need as identified through the Parish Housing Needs Survey

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			housing. Considers that the site be allocated under Policy 55 in addition to the smaller rural sites already allocated as part of the Preferred Options.	will be met on alternative sites elsewhere in Wolverley and Cookley Parish
Campaign to Protect Rural England	SALPO208	Policy 55 - Smaller Rural Sites	The “development principles” for the Clows Top site look more like policies than supporting narrative and should be incorporated into the Policy. The policy may thus need to be split, so that there are separate policies for each of the two sites	Comments are noted. Consider incorporating the development principles into the policy as suggested.
Wolverley & Cookley Parish Council	SALPO320	Policy 55 - Smaller Rural Sites	Parish Council fully support use of Sebright Road site for affordable housing scheme.	Support is noted
Rock Parish Council	SALPO324	Policy 55 - Smaller Rural Sites	Supports the suggested housing site at Clows Top but would like to see the existing approval for 12 dwellings incorporated into a bigger development including the Garage Site and Community Centre Site. Keen to see parking to support local services and a bus layby as the school bus uses this site daily.	Comments are noted. Consider expanding this site as suggested.
Environment Agency	SALPO289	Policy 55 - Smaller Rural Sites	Reference should be made to the WCS and the environmental infrastructure constraints available for this site. For section 18.9 on development principles, development should not come forward until the appropriate environmental infrastructure is in place. Once completed the ‘infrastructure Delivery Plan’ would further inform the phasing and delivery of this site.	Comments are noted. Further work on this particular site will be required in order to overcome drainage issues. Through this consultation process further conversations will be held with the land owners to consider options for this site as a whole.
Moss K	SALPO198	Paragraph 18.8	We support the inclusion of the Terrace site, but only as part of a comprehensive allocation together with the adjacent Clows Top Garage.	Comments are noted. The figures in DS01 are indicative figures to support the housing trajectory. Consider extending the allocation at Clows Top whilst being mindful of cross-

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>The Clows Top Garage is a former petrol filling station, and transport yard. Following the closure of the petrol station the front of the site has been used as a car sales lot, whilst the established uses on the remainder of the site include: HGV storage and commercial vehicle repair and associated uses not wholly compatible with the site's central village location. The 2 sites together previously had permission for residential development subject to s106 obligation to commit to the construction of off site foul and surface sewers to Rock prior to a start on site. Detailed design and approval by Sever Trent was not achieved and the approval lapsed.</p> <p>Clows Top falls within the Rural Areas of the District where further development should only generally be permitted on brownfield sites within defined settlement boundaries or for housing to meet local needs. The proposed scheme at the Terrace is for 12 affordable dwellings and connection to the main sewer is required. This scheme is not viable on its own.</p> <p>The following are potential benefits of a comprehensive approach, but which relies on the allocation of Clows Top Garage for residential development.</p> <ul style="list-style-type: none"> - Removal of unattractive buildings and uses associated with former garage and transport yard. - Delivery of a mains drainage solution for benefit of whole village. - Unlocking development of The Terrace and securing 	<p>boundary issues and housing need.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>formal parking area for Victory Hall, school bus drop off provision, visibility splay at junction and enhanced landscaping.</p> <ul style="list-style-type: none"> - Preservation of greenfield site adjacent to Highbrae for potential future growth (site suggested as potential allocation for South Worcestershire). - Provision of mixed tenure housing to meet the needs of the Parish and to help support local shops and businesses. - Potential for further planning gain involving Victory Hall and possible provision of local recycling facilities. <p>We seek the allocation of the Clows Top Garage site for housing to meet the needs of the local community, together with the necessary enabling development. This should be in addition to the currently proposed allocation of the Terrace site, to ensure that a comprehensive redevelopment can be achieved which will deliver the package of planning gain to the Parish, including the connection of Clows Top to the main drainage network.</p>	
Wolstenholme Miss S	SALPO31	Policy 56 - Major Developed Sites in the Green Belt	Once the Lea Castle site has been redeveloped would like to see public access restored to allow access by foot, cycle and horseback.	Comments are noted.
Homes & Communities Agency	SALPO106	Policy 56 - Major Developed Sites in the Green Belt	<p>Details land ownership at the Lea Castle site and highlights the fact that the site has significant estate management costs and is currently seen as a priority for delivery by the HCA as part of the Local Land Initiative.</p> <p>Highlights the Adopted Local Plan employment</p>	Comments are noted and support is welcomed. Continue to involve the HCA in discussions surrounding the most appropriate strategy for the site as the Publication document is developed.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>designation for the site and the fact that no interest has been shown in the site for employment uses since the designation. Also refers to WFDC's 2007 Employment Land Review and the issues raised in that document relating to poor access and general viability. This is reinforce by property advice received from Knight Frank by the then English Partnerships.</p> <p>The landowners welcome the policy proposing a mix of uses as set out within the document but would recommend that C3 (residential use) is added to create a mixed use development.</p> <p>Refers to two surveys which were undertaken in 2006:</p> <ul style="list-style-type: none"> • Lea Castle Hospital Infrastructure Appraisal and Abnormal Costs Review - considered access and traffic, drainage, utilities diversion and re-provision, asbestos removal and demolition issues and costs. Concludes that abnormal costs are between £2.5 and 3.4m. • Transport Assessment - indicates that to be more sustainable in transport terms existing services and infrastructure need to be improved or provided and that a dedicated bus service may be required as part of a travel plan. <p>Refers to a soft market testing event which was held on 6th May 2011. A small number of developers looked at options for the site and concluded that the site would be a prime site for housing development which would provide the high value needed for</p>	

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>infrastructure which would not be delivered through an employment use.</p> <p>The developers agreed that the site would be ideal for the following uses:</p> <ul style="list-style-type: none"> • Exclusive high value private housing development, which would provide ample financial priming to facilitate other types of development to be undertaken alongside and would not conflict with the LDF's residential proposals. • A specialist supported housing development for war veterans using a mix of all the uses identified in the site consultation document together with a small number of C3 (residential use) properties citing examples of a similar development in Birmingham. <p>The HCA and other land owners are keen to continue working with the Council and other key stakeholders to consider potential development opportunities.</p>	
Worcestershire Wildlife Trust	SALPO155	Policy 56 - Major Developed Sites in the Green Belt	We would suggest that under the 'Proposals will be permitted providing that...' section you include an additional bullet point requiring developments to enhance on and off-site GI as appropriate and in line with guidance and policy elsewhere.	Comments are noted. Consider that Green Infrastructure issues are addressed in other policies which cover this requirement.
Hovi Developments Ltd	SALPO112	Policy 56 - Major Developed Sites in the Green Belt	The potential of existing sites within the Green Belt, such as Rushock Trading Estate, should be maximised to relieve the pressure for green field take up within rural areas. Their development and enhancement should be anticipated and actively	Comments are noted and support is welcomed.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			encouraged. Restrictions should not stifle development or enhancement and therefore employment opportunity.	
Campaign to Protect Rural England	SALPO209	Policy 56 - Major Developed Sites in the Green Belt	This policy relates to three disparate sites. Because they are quite different from each other, each should perhaps be the subject of a separate policy or there should be a general policy for the three Major Developed Sites, followed by a separate policy covering each.	Comments are noted. It is not considered that there is enough detail on each of the sites to make it necessary to have separate policies for each site.
Warwick P	SALPO88	Policy 56 - Major Developed Sites in the Green Belt	As a resident of Cookley, I would like to see the Lea Castle site used for one or more of the following: <ul style="list-style-type: none"> • Hospice • Sheltered Accommodation for Retired People • Respite Care for Disabled People • Managed Woodland for Educational/Recreational Use 	Comments are noted and suggestions are welcomed. The proposed uses will be discussed with Councillors and the owners of the site before a final decision on an appropriate scheme is made.
Huntley Mrs W	SALPO92	Policy 56 - Major Developed Sites in the Green Belt	As the population are living longer there is a greater need for suitable housing for the over 50s and it should consider the need for a hospice, with suitable leisure facilities. The main area is Green Belt which could have a trim trail circuit and the woodland managed properly. Which managed properly could attract more people to the area and increase work and training places for the unemployed.	Comments are noted and suggestions are welcomed. The proposed uses will be discussed with Councillors and the owners of the site before a final decision on an appropriate scheme is made.
Hurcott Village Management Committee	SALPO94	Policy 56 - Major Developed Sites in the Green Belt	Raises concern regarding the impact of development at Lea Castle on the levels of traffic through Hurcott Village. No objection in principle to the development of the site but raises concern about the impact on heavy/speeding traffic through the village where there are high numbers of pedestrians accessing the Nature	Comments are noted. Any new development at Lea Castle will need to be supported by a transport assessment.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			Reserve, poor sightlines and difficult junctions.	
Hill Mrs G	SALPO95	Policy 56 - Major Developed Sites in the Green Belt	<p>Would wish to see the site broken up if possible. Return the green to what is was - swings, cricket pitch and benches. The land directly behind the houses on the left hand side of the Crescent (number one upwards) could then be turned into much needed allotments. The land further on (the old tennis court) and the grassed area in front of it directly in front of Number 10 the Bungalow could be turned into wetland/pool. There is no water on Lea Castle site for wildlife at all but many different species have been seen.</p> <p>The large amount of land which housed the actual hospital would be better split up and sold. Animal charity, Outward Bound type centre, golf club, Woodland Trust or similar, hospice, care homes, new school area, further education area.</p> <p>It would be very nice therefore if the council could give thought to obtaining the land adjacent to the houses and providing some amenities as detailed in the second and third paragraphs.</p> <p>The monies gained from the land are desperately needed due to our national debt so hold out very little hope that the local authority can do much.</p>	Comments are noted and suggestions are welcomed. The proposed uses will be discussed with Councillors and the owners of the site before a final decision on an appropriate scheme is made.
Barrett Mrs J	SALPO104	Policy 56 - Major Developed Sites in the Green Belt	Raises concern over the impact that development at Lea Castle will have on the traffic through Hurcott village.	Comments are noted. Any new development at Lea Castle will need to be supported by a transport assessment.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
Nicholls C	SALPO105	Policy 56 - Major Developed Sites in the Green Belt	<p>A public meeting was held in Cookley on 1st July. The District Council's options are quite broad and most ideas fell into these categories. The idea of a hospice was very popular. Also a mini retirement village. Lea Castle residents also put forward the idea of a Center Parc type development utilising the wooded areas and existing accommodation/outward bound training centre. Also under the umbrella of localism residents could manage some of the woodland. Affordable housing was mentioned. The multi-use of the site received favourable comments.</p>	<p>Comments are noted and support and suggestions are welcomed. The proposed uses will be discussed with Councillors and the owners of the site before a final decision on an appropriate scheme is made.</p>
West Midlands Safari Park	SALPO306	Policy 56 - Major Developed Sites in the Green Belt	<p>WMSP supports the designation of the Park as a MDS in the Green Belt. However, WMSP objects to the boundary of the West Midlands Safari and Leisure Park – Major Developed Site Boundary as defined on page 175 of the SAPDPD Preferred Options document. RPS consider that the boundary should be the same as the 'Development Envelope' area shown in red on the plan (Figure 1) accompanying these representations. The general principle for the identification of major tourist attractions as major Developed Sites is to include all the main operational areas within the attraction, including buildings, amusement park rides and associated infrastructure, animal enclosures and lakes (where they fall within operational area.)</p> <p>It is considered that other operational land (including the Safari Drive Through), the car parks and the other lakes should also be included within the defined MDS. Given the guidance in Annexe C of PPG2, the designation of these areas would ensure that, by</p>	<p>Comments are noted. Further discussions will need to be held as part of the development of the Publication document and the masterplanning process.</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>definition, only development that has no strategic impact on the Green Belt will be permitted without the need to demonstrate very special circumstances. All other forms of inappropriate development would need to follow the normal approach where very special circumstances would need to be demonstrated. This wider designation would not be a blanket designation where all forms of development would be acceptable at all locations within the park. This means that, for example, within the Safari Drive area, the replacement of buildings and structures for animals would not need to demonstrate very special circumstances. However, the intensification of these areas outside the parameters of the MDS would need to demonstrate very special circumstances. This is particularly important at WMSP where animal houses and maintenance buildings need to be upgraded, relocated or replaced, and the MDS designation would provide a framework for this.</p> <p>To assist the Council in defining the boundary of the MDS, RPS has carried out a detailed analysis of several similar-sized visitor attractions that are MDSs in the Green Belt. These are attached for the Council's consideration.</p> <p>Outside of the areas currently proposed as MDS in the SAPDPD, the parts of the Park that should be included in the defined area are:</p> <ul style="list-style-type: none"> (i) Safari Drive Through/other operational areas; (ii) Car park; and, 	

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>(iii) Lakes and other water features.</p> <p><i>(i) Safari Drive Through/Other operational areas</i> The Safari Drive Through and other operational areas have been excluded in the MDS area shown in the SAPDPD. This boundary, drawn tightly around the Amusement Park, Spring Grove House and the Discovery Trail areas is a very different approach to that taken at other major visitor attractions in the Green Belt, where in every case, all operational areas associated with the attraction are included within the MDS.</p> <p>In the case of Chessington World of Adventures, all operational areas that customers pay to visit are within the MDS boundary, including animal enclosures, footpaths, incidental landscaping and service areas. No part of the operational visitor attraction has been excluded.</p> <p>At Thorpe Park, the enclosed area goes well beyond the operational areas (all of which are included), to include all the lakes, undeveloped land under the same ownership, parking areas, the associated farm and watersports areas. In the case of WMSP, we would not argue that the undeveloped/non-operational areas should be included as is the case at Thorpe Park.</p> <p>At Drayton Manor the Council has included all operational areas of the theme park and zoo, which includes all animal enclosures, footways, incidental</p>	

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>landscaping and service areas. Areas of parkland that are undeveloped and do not form part of the paid attraction are excluded, but these would in our view be separate planning units in any event.</p> <p>At Legoland, the entire enclosed area of the visitor attraction is included within the MDS, including all incidental open space, lakes, pathways and servicing areas. Only the access road and car parks are excluded.</p> <p>At Camelot Theme Park, the MDS again includes the entire enclosed area of the attraction, including all open areas, service areas, car parks, the adjoining hotel and undeveloped overflow car parks.</p> <p><i>(ii) Car Park</i> Some of the theme parks reviewed have car parks which are included within their designated MDS boundary. Thorpe Park and Camelot both have all parking areas included within their respective MDS boundaries. Where local planning authorities have chosen to exclude car parks from the MDS, it is clear that it is due to the nature of the parking surface and the level of physical detachment from the parks. In the case of Chessington World of Adventures, the car parks are physically detached from the visitor attraction site and are located on a separate strip of land north of the main park. In the case of Drayton Manor, the surfaced car parks have been included, but the overflow car parks (which are not fully surfaced and are on separate parcels of land</p>	

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>separated by hedgerows), are excluded. At Legoland, as can be seen from the aerial photographs, the car parks are physically detached from the main attraction, occupying a distinct and separate piece of land.</p> <p>In the case of WMSP, the car parks are a significant developed part of the site that is integral and not physically separated from the rest of the site, and the inclusion of these areas within the MDS will provide a framework for similar development.</p> <p><i>(ii) Lakes</i> Although the Hippo Lake is included within the proposed MDS, the Boating Lake and the lake adjacent to the Amusement Park have both been excluded.</p> <p>All of the six theme parks reviewed included lakes. Most of these lakes occupy significant proportions of the park in question particularly the core area of Thorpe Park which is surrounded by lakes and where the lakes take up well over 50% of the land area, and the American Adventure, where the lake represents almost 50% of the land area. All of the lakes at all six attractions have been included within MDS boundaries as they are seen as integral features of the parks, whether operational or not. There are no Green Belt reasons why the lakes should be excluded as the development potential of water bodies is limited, but as with the previous two considerations above, it helps if the entire site can be considered comprehensively,</p>	

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>especially where they are entirely surrounded by the operational attraction. There appears to be no reason why the lakes are excluded in the case of WMSP but are not excluded at all other comparable Green Belt visitor attractions.</p> <p>In the light of the information outlined above, it is considered that the case for defining the boundary of the WMSP MDS is strong in the context of planning policy and other considerations, and in particular on the basis of the way that MDS policy has been interpreted consistently by other councils across the UK which have attractions of a comparable scale to WMSP. We therefore request that the plan on page 175 be amended accordingly. We confirm that we would be happy to meet with the Council to assist in the process of defining the exact boundary.</p>	
Crampton Mrs L	SALPO297	Policy 56 - Major Developed Sites in the Green Belt	Raises concern about development at the Lea Castle site causing additional traffic within Hurcott Village. The roads are single track and are already use as a short cut, concern that this will be increased raising concerns over road safety.	Comments are noted. Any new development at the former Lea Castle Hospital site will need to be supported by a transport assessment.
Residents of The Crescent	SALPO298	Policy 56 - Major Developed Sites in the Green Belt	<p>Identifies a number of uses for the site which the local residents consider to be suitable:</p> <ul style="list-style-type: none"> • recreational use • educational use i.e. Outward Bound • older persons residential retirement type village • hospice • health services - i.e. rehabilitation for military personnel 	Comments are noted and suggestions are welcomed. The proposed uses will be discussed with Councillors and the owners of the site before a final decision on an appropriate scheme is made.

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<ul style="list-style-type: none"> • cemetery/crematorium • use by animal charity • a centre parks type development / wildlife • ownership of a small area by the Crescent residents based on locally owned and led community type Big Society idealisms • golf courses <p>Identifies some use which are considered to be inappropriate for the site:</p> <ul style="list-style-type: none"> • prison • place for asylum seekers or migrants • social housing <p>Raises some additional questions relating to the site.</p>	
Brice Miss E	SALPO291	Policy 56 - Major Developed Sites in the Green Belt	<p>Suggestions for possible uses of Lea Castle site:</p> <ul style="list-style-type: none"> • recreation & leisure facilities e.g. activity/pioneer centre; environmental centre or nature reserve; children's farm • hospice • sheltered care facility - retirement village 	Comments are noted and suggestions are welcomed. The proposed uses will be discussed with Councillors and the owners of the site before a final decision on an appropriate scheme is made.
Jones C	SALPO293	Policy 56 - Major Developed Sites in the Green Belt	<p>Suggestions for site:</p> <ul style="list-style-type: none"> • Hospice • Pay & play golf course 	Comments are noted and suggestions are welcomed. The proposed uses will be discussed with Councillors and the owners of the site before a final decision on an appropriate scheme is made.
Morgan D	SALPO295	Policy 56 - Major Developed Sites in the Green Belt	Suggests that development at this site needs to be private sector led and that large scale B1/B2/B8 development would not be viable because of the preference for an Enterprise Zone centred around the	Comments are noted and suggestions are welcomed. The proposed uses will be discussed with Councillors and the owners of the site before a final decision on an

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			<p>Sugar Beet site. Suggests small scale bespoke offices or live-work units.</p> <p>Supports institutional residential and a small private sports facility could be built in association with this.</p> <p>Suggests best commercial return would be from 30 high value homes in woodland setting. Could also provide some affordable homes in Cookley as part of the development.</p> <p>Suggests that an economic appraisal is undertaken for "Cookley Crescent Hamlet" a domestic scale, mixed-use, environmentally friendly scheme.</p>	<p>appropriate scheme is made.</p>
Swift J	SALPO292	Policy 56 - Major Developed Sites in the Green Belt	<p>Possible uses for Lea castle site:</p> <ul style="list-style-type: none"> • activity/outward bound centre • nature reserve • sheltered village for the elderly • hospice • cemetery 	<p>Comments are noted and suggestions are welcomed. The proposed uses will be discussed with Councillors and the owners of the site before a final decision on an appropriate scheme is made.</p>
Hovi Developments Ltd	SALPO113	Paragraph 19.4	<p>It is extremely important that this site is safeguarded for employment uses and development is actively encouraged. The site description is generally considered to be an accurate reflection of the existing site and its potential for continued development, albeit within the accepted constraints of the existing defined estate boundary.</p>	<p>Comments are noted and support is welcomed.</p>
Campaign to Protect Rural England	SALPO210	Paragraph 19.5	<p>This site although well screened constitutes an exception to the openness of the Green Belt. Ideally would like to see it restored to agriculture but probably</p>	<p>Comments are noted. Any redevelopment of the site will be limited to the extent of the footprint of the existing development in</p>

Site Allocations and Policies Preferred Options Consultation Representations (September 2011)

Name	ID	Section	Summary	Officer Response
			not feasible. Otherwise, would wish to see no intensification of development, preferably less intensification. Should be explicitly stated that housing will not be allowed in the plan period	accordance with PPG2.
Meakin C	SALPO1	Paragraph 19.7	The percentages of ownership add up to 103% plus. Figures must be inaccurate.	Comments are noted. Check percentage figures and update with correct figures in the Publication document.
Wolverley & Cookley Parish Council	SALPO319	Paragraph 19.9	Parish Council agree with the proposed mix of uses suggested for the former Lea Castle site. In addition, a public meeting was held and the following uses were suggested: <ul style="list-style-type: none"> • mini retirement village • hospice • Center Parc type development • outward bound training centre • small section for affordable housing • sheltered accommodation • swimming pool • allotments • localism - areas of the site could be managed by local people for the benefit of the local community. 	Comments are noted and support and suggestions are welcomed. The proposed uses will be discussed with Councillors and the owners of the site before a final decision is made on an appropriate scheme.
Campaign to Protect Rural England	SALPO211	Paragraph 19.10	Proposed treatment of this site is appropriate but boundary needs to be carefully considered in consultation with site owners	Comments are noted.
Barratt Homes	SALPO318	Jargon Guide	Jargon Guide defines greenfield land as "Land which has never been developed..." Site contained offices, retail shop, hardstandings, greenhouses etc. so should not fall into this category.	Comments are noted however, the site is categorised as greenfield land by virtue of its previous horticultural use.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
Lawson J	KAPPO2	General Comment	Overall paperwork and documentation well presented and helpfully explained. We all ought to be more active in development and supporting transport action plans to make people come to Wyre Forest area.	Comments are noted and support is welcomed.
Coal Authority	KAPPO4	General Comment	Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.	Comments are noted.
Natural England	KAPPO5	General Comment	Support for the draft AAP and the positive treatment of the Staffs & Worcs Canal and the River Severn. Natural England would welcome early input into the design of sites adjacent to SSSIs.	Comments are noted and support is welcomed. The District Council will seek guidance from Natural England on future relevant development sites.
WCC - Transport Policy & Strategy	KAPPO26	General Comment	<p>WCC considers this to be a comprehensive document which covers all the known transport issues facing the Kidderminster Town Centre area. Further references to LTP3 could be made.</p> <p>Has any consideration been given to relocating the bus depot and its implications?</p>	<p>Comments are noted and support is welcomed. Consider adding further references to LTP3 within the document. Bus station relocation will be considered in the wider context of further development around Weavers Wharf. WCC will be consulted on any future proposals.</p> <p>The potential development of the bus depot site has not been looked at in detail. Further investigation would be required for this site.</p>
Chaddesley Corbett Parish Council	KAPPO39	General Comment	This document states that it wants to improve public transport and downgrade the Kidderminster ring road and generally improve access for public transport and foot/cycle traffic. This is a bit pointless when the public transport network in rural areas is being cut.	Comments are noted. The changes to public transport services are beyond the scope of the Local Development Framework. However, it can promote and encourage sustainable transport infrastructure to improve the viability of

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
				transport services to operators and increase their popularity.
Homes & Communities Agency	KAPPO40	General Comment	The Homes & Communities Agency supports the District's aspirations for the town centre.	Support is noted and welcomed.
Homes & Communities Agency	KAPPO46	General Comment	The plans set out in the AAP sit well with the priorities outlined by the Local Investment Plan for Worcestershire.	Comments are noted.
Asda Stores Ltd	KAPPO52	General Comment	We would highlight the need for consistency between the Site Allocations & Policies DPD, the Kidderminster Central Area Action Plan DPD and the Churchfields Masterplan SPD e.g. regarding the development of new light and general industrial uses within the Churchfields Business Park area.	Comments are noted. Alterations to the error regarding Policy 7 and Churchfields shall be made and the wording clarified at the next stage of the DPD to ensure a consistent approach.
English Heritage	KAPPO109	General Comment	Overall we welcome the preparation of the AAP for Kidderminster and the clear and concise format of the Preferred Option document.	Comments are noted and support is welcomed.
English Heritage	KAPPO110	1 - Introduction and Context	<p>Although the Preferred Options report outlines a range of studies and technical reports (1.16-1.18) there is no specific reference to any related historic environment evidence base.</p> <p>We recommend that any subsequent outline of the evidence base for the document clearly explains the evidence base on the area's historic environment and heritage assets. This is likely to include references to the relevant conservation area appraisals and management plans, local list, and the Historic Environment Record and,</p>	Comments are noted. Include further information regarding the historic environment and heritage assets evidence base. Refer to the Site Allocations & Policies Heritage Assets policy and existing evidence base.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			where relevant, the work informing the Urban Design Advice as for example any identified character areas.	
West Mercia Police	KAPPO97	1 - Introduction and Context	The KCAAP should include an overall vision for how the area and places should develop. At present, it is unclear to readers of the KCAAPPOP what the Council is aiming to achieve in Kidderminster overall and what high-level objectives that it has set itself to measure progress.	Comments are noted. Consider adding a vision statement and a list of key strategic objectives to the document.
West Mercia Police	KAPPO98	1 - Introduction and Context	<p>It is the intention of WMP, with input from HWFRS, to prepare and submit a detailed Strategic Infrastructure Assessment (SIA) with the assistance of consultants WYG. This in turn will inform the preparation of the IDP. We therefore request that paragraph 1.18 of the KCAAPPOP includes the following additional bullet point:</p> <ul style="list-style-type: none"> • Strategic Infrastructure Assessment <p>As well as recognising the work that is currently being undertaken, inserting the additional bullet point would also provide a visible demonstration of the Council's commitment to working closely with WMP and HWFRS in planning emergency service infrastructure provision alongside expected development growth.</p>	Comments are noted. It is not considered appropriate to include this in the Evidence Base as it will feed into the wider Infrastructure Delivery Plan which will be of the Evidence Base itself.
Environment Agency	KAPPO120	1 - Introduction and Context	We note that an 'Infrastructure Delivery Plan' is currently being produced and that the submission document will be informed by the completed study. We have not seen a draft of this document but would expect it to include environmental infrastructure, linked to your Council's Water Cycle Strategy (WCS), dated March 2010, undertaken by Royal Haskoning.	Comments are noted.
Environment Agency	KAPPO121	1 - Introduction and Context	For any new development early liaison between the developer, local planning authorities and the water	Comments are noted. The District Council will continue to consult and liaise

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			company is essential to ensure that the relevant engineering infrastructure is in place(as opposed to quantity of water available through the company's water abstractions) to allow water to be supplied to new developments. This work can have long lead in times making early discussions essential to ensure there are no delays later down the line.	with the relevant water company on development plans. Further consideration will be given to specific sites through the Development Management process.
Environment Agency	KAPPO122	1 - Introduction and Context	We note that Sequential Testing (Flooding) is also still being undertaken, which should be informed by the Level 2 Strategic Flood Risk Assessment (SFRA), dated February 2010, undertaken by Royal Haskoning. Again we have not seen a draft of this document. Once completed both documents should clearly inform the phasing and selection of sites for development (section 1.11).	Noted. Both documents form important parts of the evidence base to inform the site selection process.
WCC - Transport Policy & Strategy	KAPPO28	Paragraph 1.23	Suggest recognition of the importance of high quality transport links, which facilitate the efficient movement of good and people in facilitating and supporting existing and new businesses and economic growth.	Noted and agreed. Consider adding wording to the text to highlight the importance of transport links to business and economic growth.
West Mercia Police	KAPPO99	3 - A Sustainable Future - Development Strategy	WMP and HWFRS are very concerned that paragraph 3.4 of the KCAAPPOP makes no reference at all to creating a safe and crime free environment in Kidderminster. We therefore request the following amendment to paragraph 3.4 to resolve our concerns: <ul style="list-style-type: none"> Ensuring Kidderminster is safe, crime free and enjoyable for everyone. 	Comments are noted. Development Objective 13 in the Core Strategy deals with community safety and crime reduction. Consider adding reference to this in the KCAAP.
Asda Stores Ltd	KAPPO53	Paragraph 3.2	Reference in the third bullet point to the Core Strategy's identified need for 25,000sq m of retail space in Kidderminster should be amended to make clear that that	Comments are noted. Specify that 25,000sqm is in relation to comparison retail. In regard to specifying that there is

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			relates to comparison goods floorspace. An additional sentence should then be added after the last bullet point to say: "The Adopted Core Strategy includes no specific requirement for additional convenience goods retail floorspace and any development proposals for such uses will be considered on their merits against the criteria in Policy 10 of the Site Allocations and Policies DPD.	no requirement for convenience floorspace, this is not necessary as it is implied by the fact it is not mentioned in the list of other quantum of development.
West Mercia Police	KAPPO100	4 - A Desirable Place to Live	<p>WMP and HWFRS are supportive of paragraphs in chapter 4 of the KCAAPPOP, which make reference to the need to improve natural surveillance.</p> <p>However, we are concerned that there appears to be an implied assumption that greater natural surveillance alone will lead to safe, crime free environments and communities. Increased natural surveillance in the town centre will only be successful in delivering safe, crime free environments and communities if it is combined with a package of other measures such as Secured by Design and the provision of infrastructure.</p> <p>WMP and HWFRS therefore request the following amendments: -</p> <p>Housing Objectives The overall housing objectives for the KCAAP are:</p> <ul style="list-style-type: none"> • Create a sustainable, safe, crime-free and balanced community meeting a variety of needs. <p>Mixed Use Objectives The overall mixed use objectives for the KCAAP area are:</p> <ul style="list-style-type: none"> • Providing a sustainable built environment that keeps users and occupiers safe and secure through the incorporation and provision of high 	Comments are noted. Consider adding additional bullet points into the objectives boxes for the Housing and Mixed Use sections to cover the theme of community safety.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			quality design solutions, management measures and infrastructure.	
Homes & Communities Agency	KAPPO41	Paragraph 4.7	Support for plans to increase the number of people living in the town centre.	Comments are noted and support is welcomed.
Homes & Communities Agency	KAPPO42	Paragraph 4.13	HCA supports the provision of all tenures of housing to be located within the town centre. Reduced affordable housing needs to be balanced with off-site provision and supporting infrastructure. Affordable rent tenure would be beneficial also.	Comments are noted. Reduced levels of affordable housing are only considered appropriate when supported by a robust viability assessment. Section 106 contributions and their impact on viability need to be considered holistically for the greater benefit of the area.
Shaylor Developments	KAPPO38	Policy 1 - Sites for Housing	<p>Shaylor Developments would like to generally support the theme of Policy 1 in that it encourages new residential development within the KCAAP area and that residential uses are seen as essential components to achieve sustainable mixed use developments.</p> <p>The policy's requirements for such developments to provide improvements to existing amenity space and car parking provision is questionable, especially in relation to car parking where if the majority of occupants of a town centre residential scheme do not own cars and have chosen the location specifically for that reason, the development should not then have to fund the improvement of existing car parking facilities. The working of this policy requires greater clarity to distinguish what sorts of improvements to provision are required and when they are necessary.</p>	Comments are noted. Development will need to provide parking in accordance with the County Council and national standards. Negotiations will be undertaken through the Development Management process.
McCarthy &	KAPPO138	Policy 1 - Sites for	We commend the Council for its acknowledgement of the	Comments are noted. The Policies

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
Stone Retirement Lifestyles Ltd		Housing	<p>District's ageing population profile and its support for specialist accommodation for the elderly within the LDF. While both the adopted Core Strategy and the emerging Site Allocations and Policies DPD have policies specifically stating that the Council will support specialist housing for the elderly, the emerging KCAAP does not. We feel that there should be suitably worded policies supporting specialist housing for the elderly in the KCAAP.</p> <p>We feel that <i>Policy 1: Sites for Housing</i> of the KCAAP could be supplemented with a few sentences worded along the following lines:</p> <p><i>"Development proposals for accommodation designed specifically for the elderly will be supported provided that they are accessible by public transport or a reasonable walk to community facilities such as shops, medical services, places of worship and public open space."</i></p>	<p>contained within the Site Allocations and Policies DPD are equally applicable to the KCAAP area. Relevant policies have not been repeated in the KCAAP if it is not necessary. However, cross-references to this policy could be much clearer.</p>
Shaylor Developments	KAPPO37	Policy 2 - Mixed Use	<p>Shaylor Developments would like to support the aims of Policy 2 in encouraging mixed use development.</p>	<p>Comments are noted and support is welcomed.</p>
Homes & Communities Agency	KAPPO43	Policy 2 - Mixed Use	<p>It is also noted that the council intends promoting a range of uses within the town centre, in particular those providing employment opportunities and necessary infrastructure.</p>	<p>Comments are noted.</p>
Asda Stores Ltd	KAPPO54	Policy 2 - Mixed Use	<p>Asda supports the presumption in favour of mixed use development including Class A retail uses on development sites within the KCAAP area. This recognises the contribution that the retail sector can make in terms of job creation and the provision of goods and services to local communities. However the Policy's</p>	<p>Comments are noted. However, this wording is not considered to be appropriate as it could undermine the vitality and viability of the town centre.</p>

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			second paragraph should be amended to say "As part of mixed use schemes the District Council will support uses that contribute to the vitality and viability of the town centre or contribute to meeting the needs of local communities. This will include.....".	
West Mercia Police	KAPPO101	Paragraph 5.6	<p>WMP and HWFRS are therefore disappointed to see that guidance on the evening/night-time economy is fragmented and insubstantial in the KCAAPPOP.</p> <p>This spread of paragraphs in the KCAAPPOP is contrary to the tests of soundness contained in PPS12, in that in their present form they are not effective in providing robust and coherent planning policy guidance for this very important type of development.</p>	<p>Noted. The references contained during paragraphs 4.2, 4.7, 4.15 and 4.16 are general statements regarding the desire for a mix of uses in the town centre. Paragraphs 5.47 and 5.52 are general statements regarding tourism infrastructure. While these include mentions toward improving the evening economy, none of the above are intended to provide guidance.</p> <p>The paragraphs from 5.55 to 5.64 fall under the Leisure and Cultural Economy heading in the document which is felt to be an appropriate place to provide guidance on the evening economy. There is a separate Evening Economy section in order to highlight this issue.</p> <p>Consider including a specific policy on the evening/night-time economy in the publication document.</p>
West Mercia Police	KAPPO102	Paragraph 5.6	The development of a successful and diverse evening/night-time economy in Kidderminster requires a credible and robust set of planning policies to be in place. WMP and HWFRS do not dispute the benefits	Comments are noted. Consider including a specific policy on the evening/night-time economy in the publication document.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			<p>economically and socially of an evening/night-time economy in Kidderminster, but there is a direct relationship between such an economy and the number of incidents that WMP and HWFRS are required to deal with.</p> <p>Request that a dedicated section or chapter is included in the KCAAPPOP covering the evening/night-time economy. This section should use the excerpt provided from the Central Telford Area Action Plan as a good example.</p> <p>The new section/chapter in the KCAAPPOP should provide policies and supporting text covering the following:</p> <ul style="list-style-type: none"> - 1) Where evening/night-time economy development will be placed in the Town Centre; 2) When evening/night-time economy related development will be delivered; 3) The type of uses that will form a successful and sustainable evening/night-time economy in Kidderminster; 4) The measures that will be used to regulate and manage the evening/night-time economy in Kidderminster; and 5) The infrastructure required to support evening/night-time economy development in Kidderminster and potential funding sources/mechanisms. 	
Henderson Global Investors	KAPPO158	Retailing	Concerned that the requirement for new development on Weavers Wharf to coincide with progress on the Eastern Gateway is an unnecessary constraint. Suggest that this requirement is removed from the KCAAP.	Comments are noted. This statement has been included in order to re-dress the balance between the traditional town centre and Weavers Wharf and to support the vibrancy of the Bromsgrove Street area. However, it is not intended to restrict new investment in the town

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
				which may come forward.
Henderson Global Investors	KAPPO159	Retailing	There is current demand for additional retail space at Weavers Wharf and we are concerned that the limited short term identified need for comparison retailing will act as a constraint to the development of Weavers Wharf. It is therefore requested that additional text is included to identify that development at Weavers Wharf will not be precluded by the forecast demand for new retail floorspace.	Comments are noted, however, the requirement for an additional 25,000 sqm of comparison retailing up until 2026 has been established through the Examination in Public of the Adopted Core Strategy.
Asda Stores Ltd	KAPPO55	Policy 3 - Retail Development	The requirement identified in the Adopted Core Strategy is for 25,000sq m of additional comparison goods retail floorspace, and it is also clear that it is additional non-food shops that are required on the eastern side of the town centre to balance the non-food shopping development at Weavers Wharf. The Policy's second sentence should therefore be amended to say "Therefore the focus for new comparison goods retail development will be in the following areas:".	<p>The 25,000sqm of comparison floorspace requirement is targeted towards the Primary Shopping Area, but will not be restricted to certain areas within it and will not be the only use encouraged. Within the Primary Shopping Area the expansion and diversity of the retail offer will be actively encouraged. While the focus for Primary Shopping Frontages is for A1 retail, within Secondary Frontages and other areas in the Primary Shopping Area a flexible approach will be taken - as will be the case with eastern side of town as a non-primary frontage within the Primary Shopping Area.</p> <p>Furthermore, paragraph 5.18 states that the District Council will encourage new developments in the Bromsgrove Street area that will increase footfall and vitality, including a major new retail</p>

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
				store. The aim being to balance the 'retail dumbbell'. This is not restricted to non-food or comparison retail uses. Therefore, the District Council would not wish to make the amendment suggested as it is unnecessarily restrictive and does not match the aims of the KCAAP.
English Heritage	KAPPO111	Policy 3 - Retail Development	We welcome and support in broad terms the strategic vision for retail development in the area in terms of the 'retail dumbbell' focused on Weavers Wharf and Bromsgrove Street (Policy 3). We consider that this could serve to support the vitality and viability and regeneration of the wider town centre area within the ring road.	Comments are noted and support is welcomed.
Shaylor Developments	KAPPO36	Paragraph 5.26	Paragraph 5.26 offers advice on the protection of retail units within the designated frontages. RPS would contend that applying such a regimented approach to assessing the opportunities and impact of economic proposals within defined frontages will not encourage sustainable economic development and is contrary to PPS4. Therefore RPS would advise that the current inclusion of the criteria in paragraph 5.26 is unsound, not reflective of national guidance or the other AAP policies to support mixed use development	Comments are noted. However, it is considered that this approach is essential in order to safeguard the vitality and viability of the town centre and to maintain the presence of the Primary Shopping Area. The policy does not seek to prevent a mix of uses, as stated in paragraph 5.25.
Shaylor Developments	KAPPO35	Policy 4 - Primary and Secondary Shopping Frontages	Shaylor Developments would like to support the uses proposed by Policy 4 within the designated shopping frontages of the town.	Comments are noted and support is welcomed.
Shaylor Developments	KAPPO34	Policy 5 - Outside of the Shopping	Shaylor Developments would like to support the uses proposed by Policy 5 as suitable within the town centre	Comments are noted and support is welcomed.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
		Frontages	but beyond the shopping frontages.	
Asda Stores Ltd	KAPPO56	Policy 6 - Edge-of-Centre and Out-of-Centre Retailing	The policy states that edge and out-of-centre development will only be acceptable where there will be no harm to the vitality and viability of the Primary Shopping Area. That wording does not accord with the policy tests set out in PPS4. It should be amended to read "...will only be acceptable if a sequential approach to development is taken and it can be demonstrated that there will be no significant adverse impact on the overall vitality and viability of the Primary Shopping Area".	Comment is noted. Consider amending the wording of the policy to read "...will only be acceptable if a sequential approach to development is taken and it can be demonstrated that there will be no significant adverse impact on the vitality and viability of the Primary Shopping Area."
Sport England	KAPPO23	Policy 7 - Employment Development	<p>It is disappointing that there is no consideration of Sport in the context of Employment Development.</p> <p>There has been continued growth in spending on sport-related goods and services in the West Midlands, with over £2.1 billion being spent in 2008. Sports and associated industries are estimated to employ 54,200 people in the West Midlands which grew by 23% from 2005-08.</p> <p>Whilst Sport England does not have evidence on the economic impact that sport has on Wyre Forest, the economic value of sport to Kidderminster should not be overlooked.</p>	Noted and agreed. The KCAAP does state that it will actively encourage new opportunities for economic development that will help to diversify the economy of the town. It also states that leisure development will be a particular focus. Consider additional wording to the policy to specifically mentioned sports development/facilities.
Asda Stores Ltd	KAPPO57	Policy 7 - Employment Development	Within the Industry paragraph the third bullet point lists Churchfields as a site suitable for B1 and B2 industrial development. This is contrary to paragraph 5.38 which states that the KCAAP area is not a favoured location for new industrial development and the Council's employment land review which identified Churchfields as a poor	Comments are noted. Alterations to the error regarding Policy 7 and Churchfields shall be made and the wording clarified at the next stage of the DPD to ensure a consistent approach.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			location, surrounded by residential areas and with poor road access. This contradiction needs to be resolved.	However, although the focus for new industrial development is the South Kidderminster Business and Nature Park, there are areas within the KCAAP where B1/B2 development could be considered appropriate either as the main use within an area or as part of a much broader mix of uses. Wording will be added to paragraph 5.38 to clarify this.
Environment Agency	KAPPO126	Policy 7 - Employment Development	It will be of importance to ensure that any industry is appropriately located in line with the requirements of our GP3 guidance (Groundwater Protection Policy and Practice). Reference should be made in this section to the need to consider groundwater protection in determining the type of activities and proposed development that can take place.	Comments are noted. References to the Groundwater Protection Guidance will be made within the Publication document.
Natural England	KAPPO6	Tourism	Support the promotion of the canal as a tourist destination. Its role as part of the strategic green infrastructure network and as wildlife corridor should be recognised and enhanced.	Comments are noted and support is welcomed.
British Waterways	KAPPO66	Paragraph 5.43	BW welcomes the reference to the Staffordshire and Worcestershire Canal as bringing its own tourism opportunities.	Comments are noted and support is welcomed.
British Waterways	KAPPO67	Paragraph 5.50	BW welcomes the key aim of the KCAAP "...to enhance and promote the Staffordshire and Worcestershire Canal and canalside areas within the town centre." BW welcomes the requirement within Policy 8 Tourism Development that "The development of mooring spaces	Comments are noted and support is welcomed.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			and facilities on the canalside will be supported.”	
Worcestershire Wildlife Trust	KAPPO48	Policy 8 - Tourism Development	The Trust welcomes positive comments regarding the canal. However, we would recommend that the policy includes a stronger comment on the need to protect and enhance biodiversity.	Comments are noted. However, it is not felt to be appropriate to deal with this issue in this more generic tourism policy. It would appear more fitting for inclusion within Policy 16 - Staffordshire & Worcestershire canal.
English Heritage	KAPPO112	Policy 8 - Tourism Development	We broadly welcome the positive encouragement for tourism as part of the AAP and Policy 8. Could underline the importance of improvements to the public realm and other place making and design policies to tourism in the Tourism Infrastructure paragraph.	Comments are noted. Consider additional wording to the tourism infrastructure paragraph to cross reference to public realm and good design.
WCC - Transport Policy & Strategy	KAPPO29	Policy 9 - Leisure Development	WCC strongly recommends that consideration of freight/deliveries is made in this document. The logistics supply for the town centre must be considered carefully to ensure that deliveries do not cause negative impacts on traffic flow.	Comments are noted. The Site Allocations and Policies Development Plan Document deals with freight movement and this equally applies to the KCAAP area.
Environment Agency	KAPPO123	6 - Adapting to and Mitigating Against Climate Change	<p>Paragraph 6.1 states that the Site Allocations and Policies DPD includes a policy on Water Management. This misleading and should be amended, as the policy is relation to SuDS (Sustainable Drainage Systems) only.</p> <p>Whilst we would accept your statement that a flood risk policy is not required within Part A of the Site Allocations and Policies DPD, we would wish to see a flood risk policy included within the KCAAP DPD, for the reasons mentioned below. The need for a policy is also identified by the Sustainability Appraisal, which identifies flood risk as the 'main negative impact identified for sites within the KCAAP area' (p.6).</p>	<p>Comments are noted. Paragraph 6.1 to be amended to include reference of SuDS to replace Water Management.</p> <p>In addition to the policies within the Core Strategy and Site Allocations and Policies DPD, the requirement to consider flood risk is set out in PPS25 so it not seen to be necessary to repeat national policy guidance in the KCAAP. Furthermore, where flood risk has been noted for specific sites, guidance has been included within the individual</p>

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
				policy.
Environment Agency	KAPPO124	6 - Adapting to and Mitigating Against Climate Change	<p>The sequential approach in relation to flood risk must be fully utilised with regards to all potential development and allocations.</p> <p>We would therefore wish to see a policy on flood risk that concentrates the 'more vulnerable' type development (such as residential) in the lowest flood risk areas within the KCAAP.</p> <p>All development will still need to demonstrate it is appropriate given the level of flood risk, in terms of Planning Policy Statement (PPS) 25 'Development and Flood Risk'.</p>	<p>The requirement to consider flood risk of new development is set out in PPS25 and this is further highlighted in the adopted Core Strategy through policy CP02: Water Management. CP02 states that the SFRA will be used to inform the location of future development and this, amongst other considerations, will help to facilitate the application of the sequential and exception tests. It is therefore not seen to be necessary to this guidance in the KCAAP. However, better cross-references to these policies could be made.</p>
Environment Agency	KAPPO125	6 - Adapting to and Mitigating Against Climate Change	<p>All development and allocations within the KCAAP must be built and designed in accordance with your Councils Level 1 and 2 SFRA, particularly in making the development safe and not increasing flood risk elsewhere.</p> <p>Flood Risk within the KCAAP Area has been reduced by the Kidderminster Flood Alleviation Scheme (FAS). However, the Level 2 SFRA has shown that climate change will result in the risk of the reservoir overtopping being increased.</p> <p>Your Emergency Planner and, where necessary the Local Resilience Forum, will need to be consulted on applications and allocations where evacuation and rescue is an issue during times of flooding.</p>	<p>The requirement to consider flood risk of new development is set out in PPS25 and this is further highlighted in the adopted Core Strategy through policy CP02: Water Management. CP02 states that the SFRA will be used to inform the location of future development and this, amongst other considerations, will help to facilitate the application of the sequential and exception tests. It is therefore not seen to be necessary to this guidance in the KCAAP. However, better cross-references to these policies could be made.</p>

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			A flood risk policy in the KCAAP should be used to address these issues.	
Centro- WMPTA	KAPPO154	Sustainable Transport	<p>Centro considers that it is important that the above plans are consistent with national policy guidance as well as with the West Midlands Local Transport Plan (2011-2026).</p> <p>These plans fall within the West Midlands 'journey to work' area and it is therefore important that residents of any new development can have sustainable access to regional services and wider employment and education opportunities. Centro therefore recommends that cross boundary issues and travel should be given further consideration in these documents and are happy to assist and provide information where required.</p>	Comments are noted. Consider additional wording in the KCAAP to highlight the importance of the rail links to the West Midlands and the services it provides residents of Wyre Forest.
Centro- WMPTA	KAPPO155	Sustainable Transport	<p>Generally, Centro considers that development and redevelopment proposals make the use of existing transport infrastructure and services, improve connectivity locally and in the wider area where appropriate and provide high levels of accessibility for all with an emphasis on sustainable modes of travel.</p> <p>Centro recommends that these documents should encourage developments to be focused in areas already served by public transport and be designed to ensure access to it along with walk and cycling routes.</p>	Comments are noted. The policies contained within the KCAAP promote the development of a good pedestrian and cycle network as well as public transport facilities and access to them.
Centro- WMPTA	KAPPO156	Sustainable Transport	Centro also stresses that a high quality integrated transport network can assist in sustainable economic growth, job creation and regeneration, while reducing carbon emissions.	Comments are noted.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			It is essential to invest in quality integrated transport facilities and services from the outset to encourage use of more sustainable modes.	
Centro- WMPTA	KAPPO157	Sustainable Transport	<p>Centro particularly welcomes the section on Sustainable Transport and in particular the sub section on Public Transport and the outlined Sustainable Transport Objectives.</p> <p>It is noted and welcomed that a new transport interchange is planned for the existing railway station area that will also incorporate bus stops and a taxi rank and Centro are to support these proposals as they develop.</p>	Comments are noted and support is welcomed.
Natural England	KAPPO7	Policy 10 - Sustainable Transport	Pedestrian and cycle access should be integrated into the green infrastructure network where possible. New residential and employment developments should incorporate facilities for bike storage and potentially limit car parking.	Comments are noted. Consider cross-referencing this policy to the Green Infrastructure to further highlight the importance of these corridors in providing walking and cycling links. Cycle and car parking should be accordance with County Council and national standards.
Asda Stores Ltd	KAPPO58	Policy 10 - Sustainable Transport	Support the downgrading of the ring road to improve pedestrian linkage between the Churchfields regeneration area and the town centre.	Comments are noted and support is welcomed.
Sainsbury's	KAPPO89	Sustainable Transport Policy 10	Improved access to Crossley Park is supported in principle. Access into the Crossley Retail Park is via a single point of access and it is acknowledged that the Carpet Trades Way/Lower Mill Street junction becomes congested at peak times. Proposals to address this, so long as they do not cause other problems to the associated operation of the Park, are supported by	Comments are noted and support is welcomed. It is recognised that changes to the highway network need to be supported by technical evidence to show the wider impacts on traffic flows and movement. More in depth exploration to be completed as part of detailed

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			Sainsbury's.	proposals.
WCC - Transport Policy & Strategy	KAPPO27	Paragraph 6.8	Suggest that the extensive use of street trees / landscaping are directly considered as part of the ring-road downgrading.	Comments are noted. This is covered by Policy 14 Ring Road Framework which encourages the planting of street trees and other landscaping treatments.
West Mercia Police	KAPPO103	Paragraph 6.11	<p>Welcome and support the commitment to improving pedestrian and cycle links in Kidderminster. Suggest the paragraph includes cross-references to Policy CP11 of the Core Strategy and Policy 12 of the KCAAP.</p> <p>We suggest that the amendment takes the form of an additional paragraph under paragraph 6.13: 'To achieve these objectives, new pedestrian and cycle links must be designed and constructed in accordance with Policy CP11 of the adopted Core Strategy and Policy 12 of the KCAAP.'</p>	Comments are noted. Consider adding suggested wording to cross references to other relevant policies.
Natural England	KAPPO8	Policy 11 - Walkable Town	Natural England supports this policy. We welcome the reference to promenading along the waterways, which should be recognised as vital, multifunctional green infrastructure corridors.	Comments are noted and support is welcomed.
WCC - Transport Policy & Strategy	KAPPO30	Policy 11 - Walkable Town	There are wider social benefits of supporting a walkable town in terms of creating an environment which is conducive to social interaction (and community cohesion).	Noted and agreed. Consider adding wording to the reason justification for this policy to state the social benefits.
Worcestershire Wildlife Trust	KAPPO49	Policy 11 - Walkable Town	The Trust is pleased to support this policy and specifically the mention of enhancing the canal corridor for biodiversity and human interaction together.	Comments are noted and support is welcomed.
Natural England	KAPPO9	Policy 12 - Urban Design Key Principles	We welcome point I on green infrastructure.	Support is welcomed.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
Homes & Communities Agency	KAPPO45	Policy 12 - Urban Design Key Principles	The design and place-making policies are encouraged. It would be beneficial to include a steer on the importance of retrofit and residential design standards.	Comments are noted. Consider incorporating further details within the Publication document.
Worcestershire Wildlife Trust	KAPPO50	Policy 12 - Urban Design Key Principles	The Trust is pleased to endorse bullet point I. of this policy.	Comments are noted and support is welcomed.
British Waterways	KAPPO68	Policy 12 - Urban Design Key Principles	BW welcomes the reference within Policy 12 Urban Design Key Principles to the requirement for new development to respect the blue and green infrastructure of the town centre.	Comments are noted and support is welcomed.
English Heritage	KAPPO113	Policy 12 - Urban Design Key Principles	We welcome and support the commitment to preparing a Town Centre Design Framework. This should be informed by an understanding of the inherited character of the town centre.	Comments are noted and support is welcomed. We would welcome English Heritage's involvement in the development of a town centre framework.
West Mercia Police	KAPPO104	Policy 12 - Urban Design Key Principles	<p>Whilst we support the provision of Policy 12 requiring development to create a safe and secure environment, we request that it be strengthened through direct reference to Secured by Design.</p> <p>We accordingly suggest the following amended wording for Policy 12:</p> <p>i. Include high quality architecture, which enhances local distinctiveness, that will stand scrutiny as part of a design review process.</p> <p>j. Create a safe and secure environment that minimises opportunities for crime and anti-social behaviour, through the incorporation of the principles of Secured by Design.</p> <p>We also request that the amendment to Policy 12 is</p>	<p>Comments are noted. Consider additional wording to Chapter 8 to strengthen links to Secured by Design. Make suggested amendments to points (i) and (j) in Policy 12.</p> <p>Secured by Design is a Sustainability Appraisal indicator so will be monitored through the Annual Monitoring Review.</p>

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			accompanied by the inclusion of a commitment in Chapter 8 of the KCAAPPOP to monitoring how many schemes achieve 'Secured by Design' standards.	
British Waterways	KAPPO69	Paragraph 7.18	Additional bridges over the canal will improve the situation and BW would welcome the opportunity to be involved in the design of the bridges and bridge crossing shall need to comply with a number of principles.	Comments are noted. The District Council would welcome the early involvement of British Waterways.
Natural England	KAPPO10	Policy 13 - Public Realm	We welcome points (e) on street trees and (f) on SuDS. Street trees should ideally be a drought tolerant variety and provides shade, helping to future climate-proof the public realm.	Comments are noted and support is welcomed. Consider adding broad information about suitable tree types into the reason justification for the policy.
Worcestershire Wildlife Trust	KAPPO51	Policy 13 - Public Realm	We welcome this policy and are pleased to endorse bullet points e) and g). Suggest that further context be given to the SUDS guidance to the effect that SUDS should seek to achieve multiple benefits.	Comments are noted. A policy and guidance on SUDS is provided in the Site Allocations & Policies DPD. This applies equally to the KCAAP area.
English Heritage	KAPPO114	Policy 13 - Public Realm	We further welcome and support the prominence given to improving the public realm – a key component of the townscape as well as a factor in delivering wider objectives associated with tourism, sustainable transport and economic vitality.	Comments are noted and support is welcomed.
Environment Agency	KAPPO127	Policy 13 - Public Realm	We support point g to incorporate SuDS into public streets and spaces to improve surface water drainage, with reference to policy CP02 of the adopted Core Strategy (CS) and Policy 19 of the Site Allocations and Policies DPD regarding the type of SuDS, maintenance and adoption etc.	Comments are noted and support is welcomed.
Homes & Communities Agency	KAPPO44	Ring Road Framework	The downgrading of the ring road will contribute to a more pedestrian friendly environment and assist in enhancing the vitality of the town centre.	Comments are noted and support is welcomed.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
WCC - Transport Policy & Strategy	KAPPO31	Policy 14 - Ring Road Framework	The proposals for downgrading the ring road must be technically assessed using a valid traffic model.	Noted and agreed. The ring road is recognised as an important piece of transport infrastructure and any alterations to it will need to be assessed and modelled as appropriate.
English Heritage	KAPPO115	Policy 14 - Ring Road Framework	We fully welcome and support in principle the policy aspirations of downgrading the ring road (Policy 14 Ring Road Framework, Policy 15 Ring Road Character Areas and Policy 10 Sustainable Transport).	Comments are noted and support is welcomed.
Natural England	KAPPO11	Policy 16 - Staffordshire & Worcestershire Canal	Natural England supports this policy. We welcome the reference to green infrastructure in the supportive text and recommend further promoting the multi-functionality of the canal.	Comments are noted and support is welcomed. Consider adding further text in the reason justification to emphasise the multi-functionality of the canal.
British Waterways	KAPPO70	Policy 16 - Staffordshire & Worcestershire Canal	BW welcomes the inclusion of a policy specifically relating to the Staffordshire and Worcestershire Canal.	Comments are noted and support is welcomed.
Worcestershire Wildlife Trust	KAPPO77	Policy 16 - Staffordshire & Worcestershire Canal	The policy should make specific mention of the need for developments adjacent to the canal to enhance biodiversity as well as deliver the improvements already mentioned in the bullet points.	Comments are noted. Include addition wording to highlight the biodiversity potential of the canal. A number of key regeneration sites are present on the canal and biodiversity improvements will need to be carefully balanced with the need for increased natural surveillance and the recognition of the canal's urban/industrial nature and heritage.
English Heritage	KAPPO116	Policy 16 - Staffordshire & Worcestershire	We agree that the canal corridor is a major asset for the town. As such we consider it warrants a positive policy framework as part of the AAP. It also represents an	Comments are noted. Consider further reference to the canal within the heritage section.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
		Canal	important heritage asset and should be given appropriate recognition under the heritage section too.	
Environment Agency	KAPPO128	Policy 16 - Staffordshire & Worcestershire Canal	The need to protect the biodiversity value of the waterways is listed in the 'Summary of issues and options responses' but there is no subsequent reference to this in policy 16. The policy could be expanded further to include the protection of the water quality and ecology of this water body with reference to the Water Framework Directive (see comments below).	Comments are noted. Include addition wording to highlight the biodiversity potential of the canal. A number of key regeneration sites are present on the canal and it will be important to balance the need to provide active frontages and natural surveillance with opportunities to enhance biodiversity and water quality.
Sainsbury's	KAPPO90	Policy 16 - Staffordshire & Worcestershire Canal	We support the delivery of a new bridge, subject to the caveats detailed further below.	Comments are noted and support is welcomed.
Natural England	KAPPO12	Policy 17 - River Stour	Natural England supports this policy. We welcome its focus on green infrastructure and on biodiversity. The supporting text should recognise that the River Stour is designated as a Special Wildlife Site.	Noted and support welcomed. Consider adding text into the reason justification to recognise the River Stour as a Special Wildlife Site.
Worcestershire Wildlife Trust	KAPPO78	Policy 17 - River Stour	The Trust is pleased to support this policy.	Comments are noted and support is welcomed.
WM Morrison Supermarkets Plc	KAPPO162	Policy 17 - River Stour	Wm Morrison Supermarkets object to the Policy 17 which relates to requirements for developments adjacent to the River Stour. The policy has a lack of flexibility to be able to consider the appropriateness of meeting all the criteria set out. Suggest that the first sentence of the Policy should be amended to read as follows, to incorporate more flexibility: 'New developments adjacent to the River Stour should,	Comments are noted. However, the criteria set out within this policy are fundamental to the re-integration of the river Stour into the town centre.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			where appropriate:...'!	
Environment Agency	KAPPO129	Policy 17 - River Stour	<p>We support the acknowledgement of the River Stour as a wildlife corridor and reference to enhancing its biodiversity value. This policy could however be expanded to include reference to new development also protecting and enhancing the water quality and ecology of the River, in helping to deliver the objectives of the Water Framework Directive (WFD).</p> <p>The policy could also refer to new developments providing flood risk betterment in flood storage and flood flow routes and being set back from the river to provide a buffer strip.</p>	Comments are noted. Include additional wording to make reference to the need for new development to protect water quality and provide flood risk betterment.
Natural England	KAPPO13	Policy 18 - Green Infrastructure	<p>Natural England welcomes the inclusion of this policy.</p> <p>Suggest amended wording to the policy to read "all schemes within the KCAAP will need to provide green infrastructure through their design, including well integrated landscaping, tree planting and SuDS as part of the public realm".</p> <p>The policy could be further enhanced by requiring on-site GI to be connected into the wider network, where at all possible.</p>	Comments are noted and support is welcomed. Amend policy wording to incorporate suggestions.
British Waterways	KAPPO71	Policy 18 - Green Infrastructure	BW welcomes the requirements of proposed Policy 18 Green Infrastructure for sites adjacent to the Staffordshire and Worcestershire Canal to enhance the contribution of the canal to green infrastructure provision and its biodiversity value.	Comments are noted and support is welcomed.
Worcestershire Wildlife Trust	KAPPO79	Policy 18 - Green Infrastructure	Support this policy but suggest an amendment to the wording to reflect the fact that GI improvement is not	Comments are noted. Consider additional wording to this policy.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			restricted to landscaping and that the built environment has much to offer.	
Environment Agency	KAPPO130	Policy 18 - Green Infrastructure	We support the reference to enhancing the biodiversity value of the river and canal within policy 18. Reference could also be made to maintaining and improving the water quality of these water bodies, in considering WFD objectives.	Comments are noted. Consider including additional wording to make reference to water quality.
English Heritage	KAPPO117	Heritage	It is disappointing that there is no associated policy, even in broad terms as for example for Green Infrastructure. We strongly recommend that a supporting policy framework is included which expands on and localises that in the Core Strategy.	Comments are noted. A specific policy on Heritage was not included within the KCAAP as it was felt to be adequately covered by the draft policy contained within the Site Allocations & Policies DPD - which also is relevant to the KCAAP area.
English Heritage	KAPPO118	Heritage	Additionally no mention is made to archaeology. To what extent does the AAP include any known archaeological remains or its archaeological potential? At minimum the County's Historic Environment Record should be referred to and the extent of the resource or its potential acknowledged.	Comments are noted. Included additional wording to make reference to archaeology and the Historic Environment Record.
WM Morrison Supermarkets Plc	KAPPO163	Paragraph 7.75	<p>Wm Morrison Supermarkets plc object to paragraph 7.75 which relates to Conservation Areas. There has been no information published as part of the evidence base for the LDF to support the assertion that the Green Street/New Road area is of sufficient quality to become a Conservation Area.</p> <p>We suggest, therefore, that Paragraph 7.75 should be amended to include the text set out in bold italics below, and to read as follows, to more accurately reflect the</p>	Comments are noted. The evidence for this is currently being developed and a separate consultation will be undertaken during early 2012. The wording in the publication version will reflect the current position at the time.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			<p>situation: ' In addition to these, the Green Street and New Road area, contained within the Heritage Processions character area, has been identified as also being of potentially sufficient quality to become a Conservation Area. A Conservation Area Character Appraisal will be undertaken together with appropriate public consultation to define the area to be designated as a Conservation Area and identify its characteristics. This area contains the strong....'</p>	
English Heritage	KAPPO119	9 - Introduction to Part B	<p>In general the explanation and policy framework appear to identify the site specific heritage considerations relating to designated assets and non-designated assets such as local list buildings.</p> <p>It would be helpful to clarify if the County's Historic Environment Record has been used to identify any archaeological remains associated with the sites.</p>	Comments are noted. The County's HER has not been used to identify archaeological remains. Consider including a reference to the need for developers to undertake this work.
Environment Agency	KAPPO131	9 - Introduction to Part B	<p>It is currently unclear whether the Sequential Approach has been undertaken to inform the development of sites. This should be clarified as part of the evidence base.</p>	Comments are noted. A sequential test report will be published as part of the evidence base for Publication.
Environment Agency	KAPPO132	9 - Introduction to Part B	<p>Having reviewed the Part B site allocations, the potential for land contamination issues to arise is relatively high throughout the area given its industrial heritage. As it stands none of the policies in the KCAAP specifically mention the need for land contamination investigation.</p> <p>We acknowledge that land contamination issues have been considered within policy CP01 of the adopted CS. Therefore if you are not minded to include a policy within</p>	Comments are noted. Land contamination is addressed through policy CP01 of the Adopted Core Strategy and as such it was considered unnecessary to duplicate. Include appropriate cross-references within the Publication document.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			part A of the KCAAP, we would seek a reference to land contamination within the 'Introduction to Part B' section, with a link to policy CP01 of the CS.	
Environment Agency	KAPPO133	10 - Churchfields	There is currently limited reference to environmental issues within the Masterplan document and this is reflected within policy 19. I would refer you to our more detailed response to the draft Masterplan (dated 7 July 2011, our ref. SV/2010/103971/SD-01/PO1-L01).	Your more detailed response to draft masterplan is noted. As a result, the final masterplan is to contain a separate section to highlight flooding and water management issues and guidance. Additional wording to be included to Policy 19 to highlight flood risk.
Natural England	KAPPO14	Policy 19 - Churchfields Masterplan - (KCA.Ch.1)	<p>Welcome the delivery of functional recreation space connected to the wider GI network.</p> <p>Support the concept of the canal as a movement corridor benefiting from a sense of enclosure and overlook, but care must be taken to respect its role as a wildlife corridor.</p>	<p>Comments are noted and support is welcomed. Include addition wording to Policy 16 Staffordshire & Worcestershire Canal to highlight the biodiversity potential of the canal. A number of key regeneration sites are present on the canal and biodiversity improvements will need to be carefully balanced with the need for increased natural surveillance and the recognition of the canal's urban/industrial nature and heritage.</p> <p>However, this will need to be carefully balanced with the need for increased natural surveillance and the recognition of the canal's urban/industrial nature and heritage.</p>
Asda Stores Ltd	KAPPO59	Policy 19 - Churchfields Masterplan - (KCA.Ch.1)	The Churchfields Business Park has been identified as sequentially the most acceptable site in Kidderminster to accommodate a new food store, to address an identified quantitative need for additional convenience floorspace in	The vision for Churchfields is part of a wider strategy for Kidderminster which includes the Core Strategy, Kidderminster Central Area Action Plan

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			<p>the town and to provide competition to the existing superstores.</p> <p>Paragraph (b) in the Policy should be amended to read: "Provide a comprehensive mixed-use development that is housing led with commercial activity integrated into the overall Central Area regeneration".</p> <p>Paragraph (c) in the Policy should be amended to read "Provide for nodes of commercial (office, leisure and retail) activity, including small opportunities adjacent to the canalside".</p>	<p>DPD, and the Site Allocations and Policies DPD. These documents identify a more sequentially preferable site and approach for a major retail development that is within Kidderminster's Primary Shopping Area.</p> <p>The District Council's ambition for retail development in Churchfields is to enhance the Horsefair local centre with a limited amount local needs retail without having an adverse impact on the town's Primary Shopping Area. Therefore we would not wish to remove the references in the policy to 'local needs' and 'limited' in respect of retail development.</p>
Worcestershire Wildlife Trust	KAPPO80	Policy 19 - Churchfields Masterplan - (KCA.Ch.1)	The policy has the potential to conflict with Policy 18 and wider biodiversity policies elsewhere. Recommend the inclusion of a further bullet point regarding the need for developments to protect and enhance biodiversity along the canal.	Comments are noted. This is covered through Policy 16 and 18 and therefore a specific reference here is not considered necessary.
West Mercia Police	KAPPO105	Policy 19 - Churchfields Masterplan - (KCA.Ch.1)	As the Council is aware, WMP has been an active participant in the discussions leading to the development of the current proposals for the Churchfields area. This participation has been part of the active role that WMP continues to play in the community in the Churchfields area.	Comments are noted. The District Council will continue to work with WMP and HWFRS on the development of Churchfields and other future plans and developments.
Sainsbury's	KAPPO91	Policy 19 - Churchfields Masterplan - (KCA.Ch.1)	This policy should define the quantum of development that will be acceptable in this part of Churchfields. In particular it should define the maximum retail floorspace that will be permitted.	Comments are noted. Consider this issue further during the development of the publication document and the masterplan.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
Sainsbury's	KAPPO92	Policy 19 - Churchfields Masterplan - (KCA.Ch.1)	Support the creation of a bridge over the canal but have reservations about the nature of a multi-modal bridge. Our concern is that a road link for use by all vehicles (not just buses) would have unintended consequences – that is, it would create further traffic congestion and 'rat running' through the Retail Park. There is serious concern that a vehicular bridge connection between the two areas that is open to all traffic will merely increase traffic passing through Crossley Retail Park, 'rat running' to avoid congestion on the A456.	<p>Comments are noted. The Churchfields Masterplan has developed an ambition for the area for improve connectivity into Crossley Park. The transport schemes included present the ambitions for this area and have been developed using specialist transport advice. The proposals shown are indicative at this stage and have not been fully tested. It is recognised that specific transport proposals need to be supported by technical evidence to show the wider impacts on traffic flows and appreciate that this needs to be justified in regard to the effect on Crossley Park.</p> <p>Paragraph 10.7 will be amended accordingly to recognise this.</p>
Sainsbury's	KAPPO93	Policy 19 - Churchfields Masterplan - (KCA.Ch.1)	<p>The proposed vehicular bridge (near the existing Lime Kiln Bridge) would be acceptable for use by buses and would be controlled by rising bollards.</p> <p>However, a much more acceptable long term solution would be a new road off A442 Franche Rd along the alignment of Puxton Lane, crossing the River Stour and connecting both the Crossley Retail Park and Churchfields.</p>	<p>The proposed vehicular bridge needs to be supported by technical evidence to show the wider impacts on traffic flows and appreciate that this needs to be justified in regard to the effect on Crossley Park.</p> <p>The viability of a new road connecting the A442 to Crossley Park would be questionable as it would be a significant and costly infrastructure project. Furthermore, access off the A442 down Puxton Lane would not be suitable in its current format and would require</p>

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
				significant investment. This route would also pass through the Puxton Marsh SSSI which would have significant biodiversity and flood risk issues.
Sainsbury's	KAPPO94	Policy 19 - Churchfields Masterplan - (KCA.Ch.1)	In addition to specifying the floorspace maxima within the Policy, the penultimate paragraph should specify that any retail floorspace proposed above the stated threshold should be subject to a viability assessment.	Comments are noted and will be considered in conjunction with response number KAPPO91.
Asda Stores Ltd	KAPPO60	Paragraph 10.6	The paragraph states that it is envisaged that the Masterplan area could accommodate, inter alia, "small scale retail and food and drink premises". However in the absence of 'small scale' being defined in the Masterplan those words lack precision and should be deleted. The first sentence of paragraph 10.6 would therefore read "It is envisaged that the Masterplan area could accommodate in excess of 600 new homes in addition to new offices, workshops, retail and food and drink premises".	Comments are noted. The definition of 'small-scale' retail premises will be included to provide clarity to this statement. The District Council's ambition for retail in Churchfields is to enhance the Horsefair local centre with a limited amount of new retail development without having an adverse impact on the town's Primary Shopping Area. Therefore we would not wish to remove the references to 'small scale' development.
Environment Agency	KAPPO134	Policy 20 - Phase 1 - Grasmere Close - (KCA.Ch.2)	As mentioned in paragraph 10.12, the planning application process has begun for this site. For information, we have been involved in the planning application discussions with the applicant in relation to the re-development of this site. A site investigation scope has been agreed and we await the results to inform any remedial requirements in relation to land contamination.	Comments are noted.
Natural England	KAPPO15	Policy 21 - Phase 2a - Former Georgian	New pedestrian links over the canal must take care not to negatively impact on the SSSI.	Noted and agreed. The District Council will consult with Natural England on specific proposals.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
		Carpets/Stoney Lane Industrial Estate - (KCA.Ch.3)		
British Waterways	KAPPO72	Policy 21 - Phase 2a - Former Georgian Carpets/Stoney Lane Industrial Estate - (KCA.Ch.3)	<p>BW welcomes the requirements of this policy for any new developments to integrate land and water.</p> <p>BW would welcome the opportunity to be involved in the design of the bridge and the bridge crossing shall need to comply with a number of principles.</p>	Comments are noted. The District Council would welcome the early involvement of British Waterways
Worcestershire Wildlife Trust	KAPPO81	Policy 21 - Phase 2a - Former Georgian Carpets/Stoney Lane Industrial Estate - (KCA.Ch.3)	<p>Recommend an additional bullet point in this policy to strengthen the need to protect and enhance the biodiversity and green infrastructure role of the canal corridor.</p>	Comments are noted. This is to be covered through an amended Policy 16: Staffordshire & Worcestershire Canal.
West Mercia Police	KAPPO106	Policy 21 - Phase 2a - Former Georgian Carpets/Stoney Lane Industrial Estate - (KCA.Ch.3)	<p>The planning application by Bellway Homes (11/0163/FULL) obliged WMP to conduct a review to determine how policing in Churchfields should be delivered in the future. The review highlighted a preferred option, which is as follows:</p> <ul style="list-style-type: none"> Maintain existing Police Post, but request developer funding for necessary staged upgrades (in parallel with the phased regeneration plan for Churchfields) to ensure continuity of WMP service delivery as regeneration of Churchfields takes 	Comments are noted.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			place WMP have consequently taken the decision to upgrade the Police Post in stages, in parallel with the various phases of the regeneration scheme as they come forward. This decision has already been put into practice through the WMP response to the Bellway Homes application.	
West Mercia Police	KAPPO107	Policy 21 - Phase 2a - Former Georgian Carpets/Stoney Lane Industrial Estate - (KCA.Ch.3)	Work on identifying the further upgrades that will be required in response to the following phases of the Churchfields regeneration scheme is being undertaken by our appointed consultants, WYG, as part of the SIA. In light of all of the above, WMP and HWFRS request that Policy 19 of the KCAAPPOP makes reference to the need for an enhanced Police Post for Churchfields via the suggested wording: - (n) Subject to viability, maximise the benefits of development in terms of providing affordable housing and bolstering the vitality and viability of community facilities (including the Windermere House Police Post) in the area.	Comments are noted. Reference to Windermere House may be too specific for this policy. Consider additional wording in the associated text to further expand on the need to improve community infrastructure, including the stated police facilities.
Environment Agency	KAPPO135	Policy 21 - Phase 2a - Former Georgian Carpets/Stoney Lane Industrial Estate - (KCA.Ch.3)	The previous use of the site means that there is a high potential for contamination issues to arise. The site is located adjacent to a historical landfill and the possible impacts of this on the site should also be considered. We have been involved in planning application discussions and reviewed a Geo-environmental Assessment Report for this site.	Comments are noted. We welcome the EA's continued involvement on this site.
Sport England	KAPPO24	Policy 22 - Phase 2b - Former Sladen School -	Object to the loss of the playing fields of the former school unless they are shown to be surplus to requirements for the duration of the core strategy, or they are replaced.	Noted. Policy 22 states that any new development of this site will be expected to provide compensation for the loss of

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
		(KCA.Ch.4)		the playing fields. Furthermore, any capital from the sale of the playing fields by the County Council will be required to be invested back into local sports facilities.
Environment Agency	KAPPO136	Policy 22 - Phase 2b - Former Sladen School - (KCA.Ch.4)	Although there are no obvious contamination issues, in the first instance the applicant would need to undertake a desk study (as mentioned above in introduction to Part B) in order to investigate previous land uses. There is the potential that fill may have been imported to provide/create level playing fields.	Comments are noted. We would welcome the EA's continued involvement with any future development of this site.
Asda Stores Ltd	KAPPO61	Paragraph 10.22	Churchfields Business Park has been identified as an appropriate location (in terms of the sequential approach) for a new food store, to meet the needs of both the existing residents in Kidderminster and the new urban village that is being proposed across the wider Churchfields area. The paragraph's third sentence, which states that a maximum of 1000sq m of retail floorspace will be sought on the Churchfields Business Park, should therefore be deleted.	<p>The vision for Churchfields is part of a wider strategy for Kidderminster which includes the Core Strategy, Kidderminster Central Area Action Plan DPD, and the Site Allocations and Policies DPD. These documents identify a more sequentially preferable site and approach for a major retail development that is within Kidderminster's Primary Shopping Area.</p> <p>The District Council's ambition for retail development in Churchfields is to enhance the Horsefair local centre with a limited amount local needs retail without having an adverse impact on the town's Primary Shopping Area. Therefore we would not wish to remove the 1,000sq m limit to new retail floorspace in this area.</p>
Asda Stores Ltd	KAPPO62	Policy 23 - Phase	Support the allocation of the Churchfields Business Park	Comments are noted and support is

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
		3a - Churchfields Business Park- (KCA.Ch.5)	for mixed use development including Class A1 retail use.	welcomed.
Environment Agency	KAPPO137	Policy 23 - Phase 3a - Churchfields Business Park- (KCA.Ch.5)	This site was formerly occupied by the Tomkinsons carpet factory and a garage site. The previous uses of the site means that there is a high potential for contamination issues to arise. The site is located adjacent to a historical landfill and the possible impacts of this on the site should also be considered. This should be recognised in the text.	Comments are noted. Include reference to Core Strategy Policy CP01 and cross reference into site specific policies.
Natural England	KAPPO16	Policy 24 - Phase 3b - Lime Kiln Bridge - (KCA.Ch.6)	On-site, off-site or financial contributions towards open space should be provided if new development would lead to the area falling below Accessible Natural Greenspace Standards or exasperate existing deficiencies.	Noted and agreed. Include wording in the policy regarding compensation for the loss of open space.
Sport England	KAPPO25	Policy 24 - Phase 3b - Lime Kiln Bridge - (KCA.Ch.6)	Sport England would object to the loss of the Multi Use Games Area, unless it can be shown to be either surplus or it is going to be replaced by equivalent or better in terms of quantity, quality and accessibility	Comments are noted. The masterplan approach to the Churchfields area will seek to ensure that the loss of open space and play areas are compensated within the area or within easy reach. In regard to this site, the open space is essentially redundant with few people using it and a location for anti-social behaviour. More appropriate facilities could be provided elsewhere. Amend policy to require compensatory provision.
British Waterways	KAPPO73	Policy 24 - Phase 3b - Lime Kiln Bridge - (KCA.Ch.6)	BW welcomes the requirements of this policy for any new developments to integrate land and water. BW would welcome the opportunity to be involved in the	Comments are noted. The District Council would welcome the early involvement of British Waterways.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			design of the bridges and bridge crossing shall need to comply with a number of principles.	
Worcestershire Wildlife Trust	KAPPO82	Policy 24 - Phase 3b - Lime Kiln Bridge - (KCA.Ch.6)	Recommend an additional bullet point in this policy to strengthen the need to protect and enhance the biodiversity and green infrastructure role of the canal corridor.	Comments are noted. This is to be covered through an amended Policy 16: Staffordshire & Worcestershire Canal.
Environment Agency	KAPPO139	Policy 24 - Phase 3b - Lime Kiln Bridge - (KCA.Ch.6)	The previous use and location of the site means that there is a high potential for contamination issues to arise. The site is located adjacent to a historical landfill and the possible impacts of this on the site should also be considered. This should be recognised in the text.	Comments are noted. Include additional wording in the text to highlight potential contamination issues. Reference to Core Strategy policy CP01 to be given in the introduction to Part B of the document.
Sainsbury's	KAPPO95	Policy 24 - Phase 3b - Lime Kiln Bridge - (KCA.Ch.6)	See comments above in relation to the bridge link. (KAPPO92)	See response to KAPPO92.
British Waterways	KAPPO74	Policy 25 - Phase 4 - Crossley Park - (KCA.Ch.7)	BW welcomes the requirements of this policy for any new developments to provide an active frontage onto the canal. BW would welcome the opportunity to be involved in the design of the bridge and the bridge crossing shall need to comply with a number of principles.	Comments are noted. The District Council would welcome the early involvement of British Waterways.
Worcestershire Wildlife Trust	KAPPO83	Policy 25 - Phase 4 - Crossley Park - (KCA.Ch.7)	The site has a significant canal and riverside frontage and an additional bullet point could be included to reiterate the expectations to enhance these biodiversity corridors.	Comments are noted. This is to be covered through an amended Policy 16: Staffordshire & Worcestershire Canal and Policy 17: River Stour.
Environment Agency	KAPPO140	Policy 25 - Phase 4 - Crossley Park - (KCA.Ch.7)	Our most recent flood modelling for the River Stour shows that much of this site is located within the 'functional floodplain' where commercial development ('less	Comments are noted. An additional bullet point will be included in Policy 19 to highlight flood risk issues for the

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			<p>vulnerable') is not considered appropriate.</p> <p>Any proposed development would need to be further informed by a detailed Flood Risk Assessment. Consideration will also need to be given to residual risk and the inundation for overtopping and breach scenarios of the FAS within the level 2 SFRA.</p> <p>Any development at this location needs to ensure that there is no encroachment / impact to the floodplain of the River Stour, its corridor, the Puxton marshes Site of Special Scientific Interest (SSSI) and their buffering habitats.</p>	whole of the Chuchfields area.
Environment Agency	KAPPO141	Policy 25 - Phase 4 - Crossley Park - (KCA.Ch.7)	<p>The site is noted as being a historical landfill. Consequently there may be serious environmental constraints associated with this site. The creation of a new multi-modal bridge is likely to involve piled foundations which could act as rapid contaminant migration pathways.</p> <p>Sufficient information will be needed to demonstrate that contamination issues can be addressed appropriately. This should be referred to in the text/policy.</p>	Comments are noted. Include additional wording in the text to highlight potential contamination issues. Reference to Core Strategy policy CP01 to be given in the introduction to Part B of the document.
Sainsbury's	KAPPO96	Policy 25 - Phase 4 - Crossley Park - (KCA.Ch.7)	See comments above in relation to the bridge link. (KAPPO92)	See response to KAPPO92.
Natural England	KAPPO17	Policy 28 - Kidderminster Railway Station - (KCA.EG.2)	We support the creation of a transport interchange, as a way of reducing travel by private car and therefore mitigating carbon emissions.	Comments are noted and support is welcomed.
Environment	KAPPO143	Policy 30 -	In relation to Comberton Hill Island, the proposals involve	Comments are noted. We would

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
Agency		Comberton Hill Island - (KCA.EG.4)	the infilling of the subway. Clearly it would be essential to ensure that appropriate materials are imported for such an exercise (both from a geotechnical and environmental perspective) and that the appropriate Environment Agency permits/exemptions are sought.	welcome the EA's continued involvement with any future proposals.
Asda Stores Ltd	KAPPO63	Policy 31 - Phase 1: Bromsgrove Street Area - (KCA.EG.5)	Given the requirement already identified in Chapter 5 for large scale non-food development at Worcester Street/Bromsgrove Street, to balance out Weavers Wharf, the reference to "A1 Retail" in item (i) should be amended to "A1 Retail including large format comparison goods units".	The District Council will encourage new developments in the Bromsgrove Street area that will increase footfall and vitality, including a major new retail store. The aim being to balance the 'retail dumbbell'. However, this is not restricted to non-food or comparison retail uses, just uses that would add vitality to this area of the town. Therefore, we would not wish to make the suggested amendment as it would be unnecessarily restrictive and does not match the aims of the KCAAP.
Ralley B	KAPPO22	Policy 32 - Phase 2 - Worcester Street Retail Development - (KCA.EG.6)	Owners of the former Barrel pub intend to make a significant investment in the property and plan to keep it for the long-term. They are alarmed over plans to significant redesign the area as part of the Eastern Gateway project.	Policy 32 - Worcester Street Retail Development, which covers the site of the former Barrel PH, does state that a comprehensive redevelopment of this area will be expected. However, no detailed work into how this redeveloped area would look has been done. A conceptual 3D showing the area redesigned is provided with the policy, but this is purely indicative. It is therefore feasible that any renovation and/or extension of the former pub could be incorporated into a future scheme for

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
				this area.
Asda Stores Ltd	KAPPO64	Policy 34 - Waterloo Street Area - (KCA.EG.8)	Support the development of small scale Class A1/A2/A3/A4/A5 and other town centre uses in the Waterloo Street Area as part of an improved pedestrian link through the site, down from the ring road through to the proposed town centre regeneration areas at Lion Street and Bromsgrove Street. This will improve the link between the proposed redevelopment on Churchfields Business Park and the proposed new retail development being sought by the Council at Worcester Street/Bromsgrove Street.	Comments are noted and support is welcomed.
Environment Agency	KAPPO144	12 - Western Gateway	This area was formerly occupied by industry including Rock Works, timber yards and industrial estates. Ground/water contamination is therefore an important issue that must be addressed as part of the redevelopment. The southern most part of this area falls within the outer protection zone of a public water supply borehole and is therefore extremely sensitive in terms of groundwater protection.	Comments are noted. Policy will be amended accordingly.
Environment Agency	KAPPO146	12 - Western Gateway	We welcome the reference to new development contributing to the improvement of the river environment. This should include environmental improvements to the river and its corridor (i.e. water quality, biodiversity and flood risk betterment) in meeting WFD objectives.	Comments are noted. This is covered by other policies within the Local Development Framework such as Core Strategy Policy CP15: Regenerating the Waterways and Policy 17 of the KCAAP.
Environment Agency	KAPPO147	12 - Western Gateway	We would recommend that paragraph 12.26 is worded more strongly so that some betterment is gained as a result of the development. We would like to see at least some of this section of culvert removed to re-establish the open channel. We would be happy to meet with your Council to discuss the potential, and constraints, for re-	Comments are noted. Consider this in more detail during the development of the Publication document.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			development of this site in greater depth.	
Natural England	KAPPO18	Policy 36 - Park Lane Canalside - (KCA.WG.2)	We support the treatment of the canal, whose value as a green infrastructure and wildlife corridor should be recognised.	Comments are noted and support is welcomed.
British Waterways	KAPPO75	Policy 36 - Park Lane Canalside - (KCA.WG.2)	<p>BW welcomes the requirements of this policy for any new developments to integrate land and water.</p> <p>BW would welcome the opportunity to be involved in the design of the pedestrian bridge and the bridge crossing shall need to comply with a number of principles.</p> <p>Welcome the requirement for mooring facilities within the policy.</p>	Comments are noted. The District Council would welcome the early involvement of British Waterways.
Worcestershire Wildlife Trust	KAPPO84	Policy 36 - Park Lane Canalside - (KCA.WG.2)	The policy overlooks the opportunity for biodiversity enhancement along the canal corridor. we would recommend an additional bullet point to highlight that steps should be taken to enhance biodiversity,	Comments are noted. This is to be covered through an amended Policy 16: Staffordshire & Worcestershire Canal.
Post Office Limited	KAPPO47	Paragraph 12.23	<p>POL remains committed to Kidderminster Town Centre but acknowledges that Crown House is in a poor state of repair and potentially lends itself well to redevelopment.</p> <p>Providing that it was financially and operationally beneficial to do so, POL would consider relocating to an alternative premise to make way for the redevelopment of the site.</p> <p>We would be grateful if you would consult us on any further proposals and we would be delighted to meet with Council Officers and/or attend development steering</p>	Comments are noted. We would welcome further consultation with POL in future to discuss any proposals for this site and the future presence of the Post Office in the town.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			groups as the AAP progresses towards adoption.	
Mace G	KAPPO1	Policy 37 - Weavers Wharf - (KCA.WG.3)	Crown House should be treated as a priority and either modernised or redeveloped. Concern that it puts visitors off the town centre.	Crown House is highlighted within the Kidderminster Central Area Action Plan Development Plan Document as having potential for redevelopment.
Natural England	KAPPO19	Policy 37 - Weavers Wharf - (KCA.WG.3)	Natural England fully supports the proposed treatment of the River Stour and the canal, and welcomes the recognition of their value as green infrastructure assets.	Comments are noted and support is welcomed.
Asda Stores Ltd	KAPPO65	Policy 37 - Weavers Wharf - (KCA.WG.3)	The proposal that further retail floorspace should be provided at Weavers Wharf does not seem logical given the Plan has identified an imbalance of retailing within the town centre. Further retail floorspace is being proposed in the Eastern Gateway area specifically to counter balance the pull of Weavers Wharf, and that allocation/strategy is likely to be undermined by also promoting further development at Weavers Wharf.	Comments are noted. The Core Strategy sets out that up 25,000 sqm of comparison retail floorspace is to be developed in the town up until 2026. It is envisaged that this floorspace will be accommodated within the Primary Shopping Area which includes both Weavers Wharf and the eastern side of the town centre. It is the ambition of the District Council to counter-balance the 'pull' of Weavers Wharf and drive footfall over towards the eastern side of the town centre. However, Policy 31 and 32 that cover this area make provision for a wide mix of uses that would add vitality and footfall to this side of the town that extends beyond just retail. Furthermore, it must be recognised that Weavers Wharf is a key economic asset for the town which needs to be further harnessed.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
British Waterways	KAPPO76	Policy 37 - Weavers Wharf - (KCA.WG.3)	BW welcomes the requirements of this policy for any new developments to integrate land and water.	Comments are noted and support is welcomed.
Worcestershire Wildlife Trust	KAPPO85	Policy 37 - Weavers Wharf - (KCA.WG.3)	The Trust is pleased to support the thrust of this policy. We would however be keen to see a wording change under bullet point a) so that it reads 'Provide an active frontage onto the canal and riverside and enhance their contribution to <i>biodiversity</i> and the green infrastructure network'	Comments are noted and support is welcomed. Consider wording change to this policy.
Henderson Global Investors	KAPPO160	Policy 37 - Weavers Wharf - (KCA.WG.3)	While the KCAAP identifies the need for a new pedestrian bridge over the canal, Henderson Global Investors considers that further additional crossings (including vehicular crossing) should also be provided to the south of Weavers Wharf in order to increase connectivity with adjoining development sites.	Comments are noted and welcomed. Officers to engage with Hendersons to investigate this further.
Environment Agency	KAPPO145	Policy 37 - Weavers Wharf - (KCA.WG.3)	In relation to land contamination, this area has previously been subject to re-development and remediation. It is therefore essential to ensure that any proposed changes in these areas are compatible with the level of remediation achieved. It will also be necessary to ensure that the previously undertaken risk assessments (both environmental and human health) remain valid e.g. infiltration rates, areas of hardstanding etc.	Comments are noted. Further investigation to be carried out as part of more detailed proposals.
Environment Agency	KAPPO148	Policy 37 - Weavers Wharf - (KCA.WG.3)	We note that points (a) and (j) refer to active frontages onto the canal and riverside and enhancing their contribution to the green infrastructure network. This should include environmental improvements to the river and its corridor (i.e. water quality, biodiversity and flood risk betterment) in meeting WFD objectives.	Comments are noted. This is covered by other policies within the Local Development Framework such as Core Strategy Policy CP15: Regenerating the Waterways and Policy 17 of the Action Plan.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
Inland Waterways Association	KAPPO142	Policy 37 - Weavers Wharf - (KCA.WG.3)	The Inland Waterways Association support the plans for Weavers Wharf. Could we suggest that the bridge design is sympathetic with the canal scene, mooring facilities provided and a water point? Could the existing bridge be opened up to provide a turning area for the boats? This would increase visitors if boats could be turned.	Comments are noted. The design of any new bridge would need to respect the canal's designation as a Conservation Area and be of a good quality. The District Council supports the provision of additional mooring spaces and associated facilities. Further investigation to be carried out as part of more detailed proposals.
Natural England	KAPPO20	Policy 38 - Castle Wharf - (KCA.CW.1)	Natural England supports this policy. We particularly welcome points (a) and (b) on the river and canal.	Comments are noted and support is welcomed.
Worcestershire Wildlife Trust	KAPPO86	Policy 38 - Castle Wharf - (KCA.CW.1)	The Trust is pleased to support the intent of this policy and specifically the comments in bullet points a) and b) but we would advocate a specific mention of biodiversity (as well as general green infrastructure) enhancement under bullet b).	Comments are noted and support is welcomed. This is to be covered through an amended Policy 16: Staffordshire & Worcestershire Canal and Policy 17: River Stour.
West Mercia Police	KAPPO108	Policy 38 - Castle Wharf - (KCA.CW.1)	Police and Fire services are currently delivered via the Kidderminster Territorial Policing Headquarters, Habberley Road and the Kidderminster Fire Station, Castle Road. WMP and HWFRS consider that the optimum solution is to enhance the capacity and capabilities of the existing police and fire stations in Kidderminster. We believe it reasonable to state at this stage that developer obligations (in whatever form) will be required as an integral part of the funding package for both projects.	Noted. The District Council will continue to work with WMP and HWFRS on future infrastructure requirements, particularly as a result of new developments that may come forward. The fire station is identified as a community facility on the Adopted Local Plan Proposals Map. This designation will be continued and as such it is protected under Core Strategy policy CP07.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			<p>Propose a new policy to safeguard the existing fire station site in the KCAAP area, the wording suggest is as follows:</p> <ul style="list-style-type: none"> The fire station site as shown on the proposals map will be safeguarded for fire service uses. Proposals for the development of the site for fire service and related uses will be encouraged and supported wherever possible. 	
Environment Agency	KAPPO149	Policy 38 - Castle Wharf - (KCA.CW.1)	<p>The location and industrial history of the area mean that there is a high potential for ground/water contamination issues and this is an extremely sensitive hydrogeological setting. The level of desk study, and if necessary, site investigation and remediation will be high. The proposed land uses (activities) will also have to accord with the requirements of our GP3 guidance.</p> <p>There are opportunities to set the buildings further back from the River Stour for the Tram Street and MCF sites. Subject to a detailed Flood Risk Assessment, this would provide enhancements to the River Stour corridor in this location.</p>	Comments are noted. Further investigation to be carried out as part of more detailed proposals.
Environment Agency	KAPPO153	14 - Crossley Park and Mill Street	<p>The right bank of the River Stour (when looking downstream) provides an obvious break in the river corridor habitat. The treatment of this bank should require improvements to the river corridor habitats and structure, in order to deliver the green infrastructure referred to in the report.</p>	Comments are noted. This is to be covered through Policy 17: River Stour.
Worcestershire Wildlife Trust	KAPPO87	Policy 39 - Mill Street Mixed Use Area - (KCA.MS.1)	<p>We would suggest that this policy make mention of the need to enhance the canal corridor adjacent to the site, in line with other policies.</p>	Comments are noted. Reference to the canal corridor is incorrect for this site; the river corridor is adjacent to this area. This is to be covered through Policy 17: River Stour.

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
Attwood A	KAPPO3	15 - Traditional Town Centre	<p>The planning policies and development plan seem good for the future of the District.</p> <p>Concerned that the street market, if no internal site is found for it, will spoil future plans for the town. The market should be limited to certain areas and not take up all of Oxford Street, High Street, and Worcester Street - with genuine traders being given priority. Market layout must make it difficult for blind and partially sighted people.</p>	<p>Comments are noted and support is welcomed.</p> <p>Regarding the street market; it is a private operation and beyond the scope of the KCAAP. However, an objective of the KCAAP will be to improve the public realm of the town with a focus on Worcester Street, High Street and Vicar Street - the main streets where the market is located. This could provide an opportunity to reorganise these streets and make them more user-friendly for all.</p>
WCC - Transport Policy & Strategy	KAPPO32	Policy 40 - Civic Spaces	<p>The Town Hall Square currently functions as a major bus departure point and taxi rank. How will these services be affected in the future?</p>	<p>No detailed proposals have currently been progressed for this potential new piece of public open space. However, it is envisaged that this could be a multi-functional space that would not necessarily preclude the provision of public transport.</p>
WM Morrison Supermarkets Plc	KAPPO165	16 - Heritage Processions	<p>Wm Morrison Supermarkets plc object to the Indicative 3D Model of how the Green Street and Bus Depots could be redeveloped to transform the area.</p> <p>In particular, it is considered unrealistic that the Green Street/Dixon Street site (Frank Stone site) could be developed as intensively as shown on the Model.</p> <p>We suggest that the Indicative 3D Model should be omitted from the document.</p>	<p>Comments are noted. The 3D model is an indicative model for illustrative purposes.</p>

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
Environment Agency	KAPPO150	16 - Heritage Processions	<p>The location and the industrial history of the area mean that there is a high potential for ground/water contamination issues and is an extremely sensitive hydrological setting.</p> <p>The need for retention of buildings is recognised; however this may result in constraints on site investigation and remedial requirements. The level of desk study, and if necessary, site investigation and remediation will be high. Long term monitoring/mitigation measures may be required.</p> <p>The proposed land uses will also have to accord with the requirements of our GP3 guidance. The above should be noted within this section of the policy/document.</p>	<p>Comments are noted. Further investigation to be carried out by developers as part of more detailed development proposals for this area. Provide additional wording in this section to highlight these issues.</p>
WM Morrison Supermarkets Plc	KAPPO164	Policy 42 - Heritage Processions Area - (KCA.HP.1)	<p>Wm Morrison Supermarkets plc object to Policy 42 which relates to the Heritage Processions Area, and identifies a list of various uses which will be promoted. Our clients object to the restrictive nature of the range of uses which the Council will promote in the Area and the restrictive nature of the requirement to retain buildings that are not Statutory Listed Buildings. If buildings are required to be retained, there should be sufficient evidence provided in the Council's evidence base to justify their retention.</p> <p>We suggest, therefore, that Policy 42 should be amended to read as follows, to incorporate more flexibility: <i>'A mix of uses will be promoted in this area appropriate to the edge-of-centre location.</i></p> <p><i>The historic linear, processional routes along Green</i></p>	<p>Comments are noted. This list of uses is not exhaustive, however, any proposal will be expected to meet all other relevant Local Development Framework policies.</p> <p>In regard to heritage assets, the evidence for this is currently being developed and a separate consultation will be undertaken during early 2012. The wording in the publication version will reflect the current position at the time.</p>

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			<p><i>Street, New Road and Dixon Street will be protected, where appropriate, and where possible enhanced in line with the Design Quality SPG.</i></p> <p><i>As a means of achieving this, the District Council will ensure the retention and reuse of Listed Buildings, and encourage the retention and reuse of Locally Listed Buildings.</i></p> <p><i>New developments in this area will be encouraged to provide attractive and active frontages.'</i></p>	
WM Morrison Supermarkets Plc	KAPPO166	Paragraph 16.6	<p>Wm Morrison Supermarket plc object to paragraph 16.6 which relates to the Frank Stone Building. The Council's evidence base for the LDF does not include any assessment of the historic asset value of this building. The building is not Locally or Statutorily Listed and therefore its retention should not be required.</p> <p>We suggest, therefore, that this paragraph should be deleted.</p>	Comments are noted. The evidence for this is currently being developed and a separate consultation will be undertaken during early 2012. The wording in the publication version will reflect the current position at the time.
Natural England	KAPPO21	Policy 43 - Frank Stone - (KCA.HP.2)	Natural England supports this policy. We welcome points (a) and (b) on the river.	Comments are noted and support is welcomed.
WM Morrison Supermarkets Plc	KAPPO167	Policy 43 - Frank Stone - (KCA.HP.2)	<p>Wm Morrison Supermarket plc object to Policy 43. Our clients consider that the range of uses identified as acceptable are unnecessarily restrictive and inconsistent with the range of uses identified in Paragraph 16.8 which includes 'other employment uses'. There is also no evidence for the retention of the frontage of the Frank</p>	<p>Comments are noted. This list of uses is not exhaustive, however, any proposal will be expected to meet all other relevant Local Development Framework policies.</p> <p>In regard to heritage assets, the</p>

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			<p>Stone Building.</p> <p>We suggest, therefore, that this Policy should be amended to read as follows:</p> <p><i>'The Frank Stone site will be suitable for a range of commercial or residential uses. Any new development on this site will be expected to:</i></p> <ul style="list-style-type: none"> • <i>Provide a positive relationship with the river; and</i> • <i>Contribute to the improvement of the riverside environment and enhancement of green infrastructure, where appropriate; and</i> • <i>Provide an attractive frontage to Green Street'</i> 	<p>evidence for this is currently being developed and a separate consultation will be undertaken during early 2012. The wording in the publication version will reflect the current position at the time.</p>
Worcestershire Wildlife Trust	KAPPO88	Policy 43 - Frank Stone - (KCA.HP.2)	<p>The Trust welcomes this policy and in particular bullet points a) and b). However we would be keen to see b) strengthened to include a specific mention of biodiversity enhancement.</p>	<p>Comments are noted. This is to be covered through Policy 17: River Stour.</p>
Environment Agency	KAPPO151	Policy 43 - Frank Stone - (KCA.HP.2)	<p>We would support part b of policy 43, regarding the improvement of the water environment. At the moment the existing building over hangs the River Stour (see comments above for policy 17 'River Stour').</p>	<p>Comments are noted and support is welcomed.</p>
Environment Agency	KAPPO152	Policy 44 - Green Street Depot - (KCA.HP.3)	<p>The industrial history of the area means that there is a high potential for ground/water contamination issues and is in an extremely sensitive location. We are also aware that underground storage tanks exist on the site.</p> <p>The level of desk study, and if necessary, site investigation and remediation will be high. Long term</p>	<p>Comments are noted. Further investigation to be carried out as part of more detailed proposals by developers.</p>

Kidderminster Central Area Action Plan Preferred Options Consultation Representations (September 2011)

Reporting Name	ID	Section	Summary	Officer Response
			monitoring/mitigation measures may be required. The proposed land use will also have to accord with the requirements of our GP3 guidance.	
Shaylor Developments	KAPPO33	C - Maps	Support the area of the Primary Shopping Area but objects to the extent of secondary shopping frontages identified. Suggest allocating the remaining part of Exchange Street, up to the riverside, as secondary frontage in order to provide a tangible pedestrian link between Weavers Wharf, the bus station and the town centre.	Comments are noted. The suggestion to extend the Secondary Shopping Frontage does not reflect the location of currently retail premises. However, the site in question is still within the Primary Shopping Area and where retail uses are acceptable and, as Policy 5 states, a flexible approach to uses will be encouraged.
WM Morrison Supermarkets Plc	KAPPO161	C - Maps	Wm Morrison Supermarkets plc object to the map at Appendix C which shows the area which the Council considers to be the Primary Shopping Area for Kidderminster. In particular our clients object to the exclusion from the Primary Shopping Area of the existing Morrisons store at Green Street.	The Primary Shopping Area has been defined in order to concentrate retail activity and footfall and contribute to creating a more viable town centre. It is not intended to stretch the PSA too wide and thus risk diluting retail activity in the town and undermining the centre. The District Council considers that the site of the Morrisons store be appropriate as an edge-of-centre location.

Site Allocations and Policies and Kidderminster Central Area Action Plan Draft Sustainability Appraisal Report Consultation Representations
(September 2011)

Name	ID	Section	Summary	Officer Response
Lawson J	DSA2	Whole Document	Overall paperwork and documentation well presented and helpfully explained. We all ought to be more active in development and supporting transport action plans to make people come to Wyre Forest area.	Support is noted and welcomed.
Natural England	DSA8	Whole Document	It is our view that the SA/SEA elements relating to the Kidderminster Centre AAP are appropriate.	Comments are noted.
Chaddesley Corbett Parish Council	DSA14	Summary and Outcomes	Chaddesley Corbett is grouped with Blakedown who do have facilities for Children, but Chaddesley Corbett does not have any children's facilities in the Parish. This is therefore not a true representation.	Comments are noted. The figures are taken from the PPG17 audit which looked at facilities for children and young people on a ward basis. The full audit acknowledges that there are localised deficiencies within these areas. Consider including a more detailed explanation within the final SA Report.
Natural England	DSA3	Section 5.1	We would like to reiterate our previous recommendation to add the Wildlife and Countryside Act 1981 and the Natural Environment and Rural Communities Act 2006 to your list of national plans/policies.	Comments are noted. Include these documents within the Final Sustainability Appraisal Report.
English Heritage	DSA15	Section 5.1	Suggests including West Midlands Historic Environment Strategy - Putting the Historic Environment to Work (2009).	Include this within the Final Sustainability Appraisal Report.
English Heritage	DSA16	Section 5.2	As already indicated in the context of the main consultation documents, it would be useful to clarify whether the county HER has been checked with regard to the potential impacts on non designated assets, including non designated archaeological remains.	Comments are noted. This information is not currently included. Consider including this information as part of the baseline and to inform the appraisal of sites within the Final SA Report.
Natural England	DSA4	Paragraph 5.2.11	In paragraph 5.2.11, it would be useful to include comment/figures to illustrate the condition of the District's SSSI.	Comments are noted. Include figures relating to the condition of the District's SSSIs within the body of the Final Sustainability Appraisal Report.
Natural England	DSA5	Section 5.5	The indicators provided under objective 11 "Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and	Comments are noted. Consider revising these indicators as part of the Final Sustainability Appraisal Report.

Site Allocations and Policies and Kidderminster Central Area Action Plan Draft Sustainability Appraisal Report Consultation Representations
(September 2011)

Name	ID	Section	Summary	Officer Response
			sense of place” don’t really measure impacts on the landscape. We recommend reference to the county’s Landscape Character Assessment and perhaps capturing the number of applications approved contrary to the advice of landscape specialists.	
Natural England	DSA6	Section 5.5	Objective 16 “Mitigate against the unavoidable negative impacts of climate change” could include additional indicators around insulation, orientation etc, drawing upon the Code for Sustainable Homes and the TCPA’s Climate Change Adaptation by Design.	Comments are noted. Consider including additional or alternative indicators under this objective, however, indicators have been explored in detail and the amount of data available in this area is very restrictive.
Bradley J	DSA1	Table 6.2.1	<p>Please note, our land 'Bradley's Paddocks' is included within H129.</p> <p>Comments re Negative Impacts:</p> <ul style="list-style-type: none"> • Loss of open views - the open views are only visible by actually entering the site. • Agricultural Grading - the land is predominantly Grade 3b with a considerable proportion as Grade 3a - not grade 2 as stated. • Any new development on undeveloped land will impact on Kidderminster and Stourport-on-Severn regeneration and of course noise and light pollution are increased but this subsequently means that the tight band of development around the towns will never expand and cater for the growing population. This subsequently means higher property prices and greater demands on social housing. 	Comments are noted. Re-consider the loss of views, re-check the agricultural land classification map. With regards to the regeneration of Kidderminster and Stourport-on-Severn the priority is to bring forward brownfield sites within these areas as set out through the Core Strategy. It is acknowledged that most new development will have an impact on noise and light pollution and that mitigation measures will need to be put in place to address this.
Natural England	DSA7	Table 6.2.2	In Table 6.2.1 the SA identifies the potential for the housing development at the Former British Sugar Site to negatively affect biodiversity. This is equally true of employment development and as such we suggest this point is added to table 6.2.2. In addition, we suggest that there is the potential for development of either kind to negatively impact the Wilden Marsh and Meadows SSSI	Comments are noted. Include this within the Final Sustainability Appraisal Report.
English Heritage	DSA17	Paragraph 11.2.1	The proposed set of indicators for monitoring the historic environment and heritage assets appear useful and support their	Support is noted and welcomed.

Site Allocations and Policies and Kidderminster Central Area Action Plan Draft Sustainability Appraisal Report Consultation Representations
(September 2011)

Name	ID	Section	Summary	Officer Response
			practical implementation.	
Sport England	DSA9	Appendix A	The document ' <i>Sign Up For Sport: A Regional Plan for Sport in the West Midlands 2004-2008</i> ' is out of date, and while a few of the policies may have some or limited relevance for today, this document should be deleted from p.72. Also the Wyre Forest does not have a robust and current playing field strategy, therefore, it does not have a complete PPG17 compliant audit.	Comments are noted. Remove this reference to this document. The Worcestershire County Playing Pitch Strategy provides a detailed analysis of playing pitches by typology. This informed the PPG17 audit.
Sport England	DSA10	Appendix A	Sport England would also like to advise that the previous National Sports Strategy 'Game Plan', the Government's strategy for delivering sports and physical activity, has been replaced by Sport England's strategy 2008-2011. This can be accessed on our website at: http://www.sportengland.org/about_us/what_we_do.aspx .	Comments are noted. Include this document in Appendix A of the Final SA Report.
Sport England	DSA11	Section B.1	Health and Well-being Suggests including data from the following: <ul style="list-style-type: none"> • Active People Survey • Local Sport Profile • Culture and Sport Evidence Programme • Sport England Market Segmentation 	Comments are noted. Include these statistics within the final Sustainability Appraisal Report.
Sport England	DSA12	Section B.1	Emphasis the importance of sport and sport related expenditure in the West Midlands economy and includes some information form Active People and Market Segmentation for the District.	Include some information relating to the importance of sport in the District's economy within the Final Sustainability Appraisal Report.
Sport England	DSA13	Appendix C	Objects to sites H064 and H058 being allocated for residential development in the absence of a robust playing field assessment. Includes an extract from Sport England's Playing Field policy highlighting the circumstances under which playing fields may come forward for development.	Comments are noted. Both sites H058 and H064 were identified through the SHLAA process and have been assessed against the SA framework but were not considered suitable for inclusion within the Preferred Options Paper.