

Open

Special Cabinet

Agenda Item No. 3.1 – Local Plan Review Pre-Submission Publication

Appendix 2 – Summary of Consultation Responses for the Preferred Options Consultation

Part 2 of 5

6pm
Tuesday, 30th October 2018
Council Chamber
Wyre Forest House
Finepoint Way
Kidderminster



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Company / Organisation	ID	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
CORE11	LPPO136	1.1	Support	Support for paragraph 1.1.	Support is noted.
CORE11	LPPO137	1-2	Support	Support for paragraph 1.2.	Support is noted.
	LPPO4362	1.3	Comment	Wyre Forest has no option but to find a new building plan to comply with the basically enforced Government legislation, however let us make the right decisions and plans now to resolve the run down areas of the town which can be addressed along with the new building schemes.	Comments noted.
Taylor Wimpey West Midlands	LPPO1548	1.3	Comment	A plan period to at least 2034 is supported. This satisfies national guidance in the NPPF. A plan period of at least 15 years gives certainty to developers and provides clarity to local residents and employers.	Support is noted.
Persimmon Homes Limited	LPPO1420	1.3	Object	<p>NPPF paragraph 157 states Local Plans should have a 15 year time period.</p> <p>The emerging Plan is for a period up to 2034. The plan will not be adopted until February 2019. There is, no leeway should the Plan be delayed at any stage.</p> <p>Factors which could affect the plan making process in Wyre Forest. At the present time the Council has suggested that Wyre Forest has a peripheral relationship to Birmingham City Council and therefore there is no current overriding requirement for the District to make provisions for the growth of the City. Birmingham has unmet housing need and the Black Country Authorities have a shortfall, number yet to be confirmed but likely in</p>	<p>These comments are noted. NPPF para 157 states that Local Plans should “<i>be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.</i>” The word used here is “preferably”. However, we will consider the possible benefits of increasing the Plan period as we continue our work with the Pre-Submission Plan.</p> <p>We are aware of the housing shortfall in the Black Country and Birmingham HMA areas. Duty to Cooperate meetings have</p>

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				<p>excess of 22,000 dwellings.</p> <p>This will fundamentally change the way in which the Birmingham figures need to be distributed. It will put pressure on the Local Authorities adjoining the Black Country area to accommodate additional growth. This could in turn result in Wyre Forest being required to accommodate housing to help meet the growth requirements of the conurbation generally. If this is the case, and further work needs to be undertaken to inform the emerging plan, the combination of these factors could result in a delay in the plan making process with the consequence that the timetable for the preparation of the emerging Wyre Forest’s Local Plan will slip. Even a relatively modest delay could result in the plan not having a 15 year time horizon from the date of adoption and, therefore, failing the requirements of the Framework.</p> <p>The plan period should be extended by 2 years. If the preparation of the plan progresses as hoped, extending the plan period will have no adverse impacts on the progression of the document. If, however, there are any delays this approach will ensure that the plan is Framework compliant.</p>	<p>and continue to be held with the Black Country and Birmingham Local Authorities.</p>
	LPPO3667	1.3	Object	1.3. states “ <i>To consider the amount of development that will be required in response to the most recent official data (including population trends, demand for housing,</i>	Objections noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The

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				<p><i>economic trends) and locally generated evidence”;</i></p> <ul style="list-style-type: none"> • <u>Demand for housing</u>: where is this demand from? You have not shown sufficient evidence for this demand. There is a national demand for property in large cities but not in Wyre Forest due to lack of employment in the area, lack of quality schooling and infrastructure. • The requirement for 5,400 is shoehorned in to Kidderminster to create an artificial demand. It does not correlate with current demands, trends or growth prospects for the region. • The housing need outlined is incorrect <ul style="list-style-type: none"> ○ Wyre Forest growth in population has not grown as advised. ○ The office of national statistics sub national population projections 2014 provides a projection for 2016 to 2034 of 4.65% 4629. ○ The growth to 2015 has been 2.7% ○ Therefore your growth projections are unsound. ○ The required number of houses are not required ○ A requirement of 200 per annum is more realistic 200 x 17 years. c 3000 houses ○ The report assumes a vacant dwelling rate of 4.5%. As at 2015 it was 2.6% therefore the report is over estimating 	<p>Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District.</p> <p>Since the Preferred Options consultation in 2017, the Government have released their new Standardised Methodology for calculating housing need in Local Authority areas. Therefore, a revised OAHN study has been commissioned and this will use the new standardised methodology to calculate the housing need for Wyre Forest District. In addition to this, an update to the Employment Land Review has also been requested. Both of these two evidence base studies will be used to inform the future growth options in terms of the site allocations for the emerging Local Plan.</p>

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				<p>by c900</p> <ul style="list-style-type: none"> The Growth for jobs forecast appears to be very optimistic and not based on current trends or evidence. 	
Gemini Properties	LPPO1189	1.3	Object	<p>NPPF para.157 advises local plans should be drawn up over appropriate timescale - preferably 15 years to take into account long term development requirements. The emerging Plan goes up to 2034 with adoption currently timetabled for February 2019. This gives no leeway for delays. The Housing Distribution report for Birmingham's unmet housing need will not be available until later this year. The Black Country Authorities also are unable to meet their own need. This could potentially result in Wye Forest being required to accommodate housing need from the conurbation. This could well lead to further delays in the Plan which would mean it would not have a 15 year horizon after adoption. Suggest plan period is extended.</p>	<p>These comments are noted. NPPF para 157 states that Local Plans should “<i>be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.</i>” The word used here is “preferably”. However, we will consider the possible benefits of increasing the Plan period as we continue our work with the Pre-Submission Plan.</p> <p>We are aware of the housing shortfall in the Black Country and Birmingham HMA areas. Duty to Cooperate meetings have and continue to be held with the Black Country and Birmingham Local Authorities.</p>
Stourport High School	LPPO1200	1.3	Object	<p>Timetable suggests that Plan will have a 15 year time horizon from date of adoption - minimum expected by NPPF. Timetable is very ambitious and does not allow for further slippage if growth requirements of conurbation have to be included. Timeframe should be extended by 2 years and thus also the housing requirement on a pro</p>	<p>These comments are noted. NPPF para 157 states that Local Plans should “<i>be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.</i>” The word used</p>

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				<p>rata basis.</p> <p>Wyre Forest has a peripheral relationship to Birmingham City Council. Birmingham unmet housing need figures will not be made available until later this year. In addition, the Black Country Authorities shortfall is understood to be in excess of 22,000 dwellings.</p> <p>This could in turn result in Wyre Forest being required to accommodate housing to help meet the growth requirements of the conurbation generally. If this is the case, and further work needs to be undertaken to inform the emerging plan and the consideration of these factors results in any delay in the plan making process, the timetable for the preparation of the emerging Wyre Forest's Local Plan will slip. Even a relatively modest delay could result in the plan not having a 15 year time horizon from the date of adoption and therefore, failing the requirements of the Framework.</p>	<p>here is "preferably". However, we will consider the possible benefits of increasing the Plan period as we continue our work with the Pre-Submission Plan.</p> <p>We are aware of the housing shortfall in the Black Country and Birmingham HMA areas. Duty to Cooperate meetings have and continue to be held with the Black Country and Birmingham Local Authorities.</p>
Barratt Homes West Midlands	LPP0765	1.3	Object	<p>Timetable suggests that Plan will have a 15 year time horizon from date of adoption - minimum expected by NPPF. Timetable is very ambitious and does not allow for further slippage if growth requirements of conurbation have to be included. Timeframe should be extended by 2 years and thus also the housing requirement on a pro rata basis.</p>	<p>These comments are noted. NPPF para 157 states that Local Plans should "<i>be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.</i>" The word used here is "preferably". However, we will consider the possible benefits of increasing the Plan period as we continue our work with the Pre-</p>

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					<p>Submission Plan.</p> <p>We are aware of the housing shortfall in the Black Country and Birmingham HMA areas. Duty to Cooperate meetings have and continue to be held with the Black Country and Birmingham Local Authorities.</p>
Barratt Homes West Midlands	LPPO812	1.3	Object	<p>NPPF para.157 advises local plans should be drawn up over appropriate timescale - preferably 15 years to take into account long term development requirements. The emerging Plan goes up to 2034 with adoption currently timetabled for February 2019. This gives no leeway for delays. The Housing Distribution report for Birmingham's unmet housing need will not be available until later this year. The Black Country Authorities also are unable to meet their own need. This could potentially result in Wye Forest being required to accommodate housing need from the conurbation. This could well lead to further delays in the Plan which would mean it would not have a 15 year horizon after adoption. Suggest plan period is extended.</p>	<p>These comments are noted. NPPF para 157 states that Local Plans should “<i>be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.</i>” The word used here is “preferably”. However, we will consider the possible benefits of increasing the Plan period as we continue our work with the Pre-Submission Plan.</p> <p>We are aware of the housing shortfall in the Black Country and Birmingham HMA areas. Duty to Cooperate meetings have and continue to be held with the Black Country and Birmingham Local Authorities.</p>
CORE11	LPPO138	1-3	Support	Support for paragraph 1.3.	Support is noted.
CORE11	LPPO139	1-4	Comment	The strategic element and policies noted at 1-4 should	Comment is noted. The NPPF is the

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				be read in conjunction with 1-12. & 1-14. This would clarify the legal requirements from the inspectorate. As the NPPF Is not a statutory instrument. However the CORE STRATEGY is.	<p>national planning policy, and therefore the emerging Local Plan must be in conformity with it.</p> <p>Note that planning applications are assessed against the NPPF as well as the Development Plan for the area.</p> <p>The Local Plan Review will be replacing the currently adopted Core Strategy. At Examination, the emerging Local Plan Review will be tested against the soundness test as set out in the NPPF para 182.</p>
CORE11	LPPO140	1-5	Support	Support for paragraph 1.5.	Support is noted.
CORE11	LPPO141	1-6	Comment	After (e.g. roads, schools, utilities) Add, Open Spaces	Comment is noted.
CORE11	LPPO142	1-7	Support	Support for paragraph 1.7.	Support is noted.
Wyre Forest Green Party	LPPO1495	1.8	Comment	Planning must have strong community involvement. Unfortunately, this Local Plan Review has been conducted during summer holidays and many residents have claimed that they do not have adequate time to understand the documents and discuss it with their communities. As mentioned elsewhere The Draft Local Plan offers up a simplistic “Option A” and “B” to residents where many areas are in both (so-called “Core”).	The minimum requirement for a Local Plan consultation event is 6 weeks; the Preferred Options consultation ran for 8 weeks. This gave members of the public an extra 2 weeks than normal to respond. We will however take your comments on board and will consider these issues next time we undertake a consultation event.
	LPPO1570	1.8	Comment	We are a small group who have come together with a	It is disappointing to read that you are

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				<p>common goal, which is to raise awareness within Burlish and Lickhill Estates, about the proposals Wyre Forest District Council (WFDC) have recently released to build a significant number of houses on greenfield sites in the immediate area, these being:</p> <ul style="list-style-type: none"> • The field at the top of immediately adjacent to the nature reserve (LI /2) • The field which runs parallel with <u>Burlish Crossing and Bewdley Road North (LI/5)</u> <p>The area currently occupied by a garden centre and horse paddocks on <u>Lickhill Road LI/6/7)</u></p> <p>We canvassed a number of our immediate neighbours to determine if they were aware of these proposals and it was clear they were not. Our primary aim was to gauge the extent of knowledge residents had about the plans and whether they were concerned sufficiently to wish to raise an objection or to comment formally to WFDC. We spoke to 197 people in these areas. Many residents were unaware of the consultation and nearly all canvassed expressed concern for the plans to build on Greenfield sites.</p> <p>It is clear the method of communicating the impact of the Local Review Plan falls far short of those expected by a local authority. The consultation period also took place during school holidays and factory shutdown, when many people would have been away from home and therefore not in a position to either see any information</p>	<p>not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. In particular, the two drop-in sessions held within Stourport were very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council’s website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>We therefore do not agree that the consultation period should have been extended as this consultation had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider</p>

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				<p>regarding the plans or comment upon them. We therefore formally request an extension of the consultation period to 30 September 2017, to allow wider communication and communication to local residents, to include communication with schools, GP surgeries, dentists. We would also urge the Council to further communicate with residents within the Wyre Forest district, perhaps by individual letters to homes including the plans with proposed housing numbers, and/or use of local newspapers such as the Kidderminster Shuttle and Express and Star. We look forward to receiving a positive response to our request.</p>	<p>these issues next time we undertake a consultation event.</p>
	LPPO1583	1.8	Comment	<p>We were only notified of the proposed changes to the Local Plan when invited to attend a public meeting in June 2017, despite there being a published SA scoping report of May 2015 and the revised scoping report of September 2015. The failure to notify the residents of the proposed alterations to both Green Belt and loss of amenity of a proposed new northeast to south road does not show the Council in a good light. There is very little time for residents to prepare a response in the full detailed way we would have liked.</p>	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. The drop-in sessions were all very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the</p>

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					<p>Council’s website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event was approved by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
	LPPO3955	1.8	Comment	<p>We have never received any leaflets from either WFDC or the developers Barberry proposing to build on the Baldwin Road site. We were informed by residents in Greenhill. Other residents received the leaflet from Barberry developers and attended the Rose theatre meeting but were not aware about the Local Plan Review. This may account for the poor attendance. Commenting on the WFDC local plan is more important but I fear many people will not be aware of this because they did not receive the WFDC leaflet. Why is this?</p>	<p>The leaflet produced by Barberry developers was nothing to do with the Council.</p> <p>In terms of the Council’s Preferred Options consultation, leaflets were sent out to households within the District and advertising and press releases were issued throughout the consultation. There were also eight drop-in sessions.</p>
	LPPO3762	1.8	Comment	<p>Having had an opportunity to view the Plan A and B options at the Stourport Civic Centre I would like to put forward the following comments.</p> <p>Firstly, I very much appreciate the authorities setting up an opportunity for local people to view and comment on</p>	<p>Thank you for your positive comments. We will also take on board the issues you have raised to help us improve our next consultation event.</p>

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				<p>the proposals. It was extremely useful to be able to view the diagrams of all the proposed sites – some of which I was previously aware of, and some I was not aware of.</p> <p>It is excellent that the local authority is looking to plan for the future rather than just react to the NOW situation. This would appear a very sensible way to prevent issues and prepare for coming generations.</p> <p>Overall the proposals do seem to be addressing key elements laid out in the full Preferred Options document.</p> <p>However, there are situations where remote people involved in putting together the reasoning for the plan will not be aware of all the specifics of individual locations.</p>	
	LPPO3390	1.8	Comment	<p>I was concerned that at the consultation I attended the emphasis seemed very much biased towards Option A, with little said about Option B, or other alternatives. This cannot be right, particularly when coupled with the knowledge that, without the intervention of our excellent local independent councillor, the planners had no intention of holding a consultation on Spennells.</p>	<p>8 drop-in sessions were held throughout the District during the consultation event and all were very well attended. The drop-in sessions were also held at different times of the day including evenings and weekends to give people the opportunity to attend.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your</p>

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					comments on board and will consider these issues next time we undertake a consultation event.
	LPPO2816	1.8	Comment	<p>The map within the consultation document is incorrect and misleading, it shows land that we know is being looked at for affordable housing.</p> <p>Some residents living on the MHDC side of Clows Top did not receive any information on this matter from WFDC. We and another resident of Clows Top did our own flyers to alert residents to the full details of the consultation for Clows Top. We feel Rock PC should have been looking to inform the village of this issue, it was not sufficient to put it on their PC agenda on the notice board.</p>	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and</p>

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					<p>Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p> <p>We will ensure that the base maps used in the emerging Local Plan are the most up-to-date versions available to us.</p>
Summerfield Against Land Transformation	LPPO1610	1.8	Comment	<p>We are concerned about:</p> <ul style="list-style-type: none"> the timing and limitations of the consultation the influence of developers, land owners and their agents upon the plan. <p>The overall length of the planning <u>process</u> is problematic. Many members of the public lose track of, or fail to appreciate the significance of, key stages of the process. There is an overreliance on the ‘evidence’ to emerge from earlier consultation, much of which came from landowners and developers. Much more should have been done to consult earlier on key elements such as the Green Belt Review. The Council needs to do much more to inform, engage with and stimulate an <i>active</i> discussion — <u>at each stage</u> - of such far reaching proposals. Consultations should not be undertaken during the peak holiday period as this disadvantages the public.</p>	<p>The minimum requirement for a Local Plan consultation event is 6 weeks; however, the Preferred Options consultation ran for 8 weeks to take account of the school holidays. This gave members of the public an extra 2 weeks than normal to respond. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p> <p>The Green Belt study was undertaken by consultants who have extensive</p>

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					<p>experience of producing these types of studies. Using consultants also meant that it was an ‘independent study’ and less open to criticism than if the Council had undertaken the study themselves.</p> <p>Pre-application discussions are confidential discussion that a developer or landowner can request from the Development Management Planning team. It is up to the developer if they want to request pre-application advice before submitting a planning application to the Local Authority.</p>
	LPPO4878	1.8	Comment	<p>At the consultation event I attended there was nothing in detail, it was a struggle to actually get to the tables, and I felt, maybe erroneously, that there was an element of hoodwinking going on. Is there a road to build, if so where and why? Is one example of questions asked and not coherently answered. The timing of this consultation is inappropriate. Schools are now closed, the holiday season is upon us, and there is very limited time for residents to properly digest the full implications of this plan and respond thoughtfully. I feel distressed, rushed, and that matters which affect the town are being pushed through. I sincerely hope that our elected members listen to what is being said, that the plans and future consultations are open, honest, and based on fact.</p>	Comments noted.

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	LPPO5064	1.8	Comment	<p>Having attended the local 'drop in session' at Heronswood School I was appalled by the lack of information on the effect your plans would have on the infrastructure of the area; mainly on the new road proposals which would have a dramatic effect on the environment, with increased traffic, traffic noise and higher emissions of exhaust fumes with resulting increased risk to health.</p> <p>Your officers were unable or did not wish to explain in any detail what your plans were to cope with the effect of building new homes and where the resulting traffic would enter and exit the planned development.</p> <p>As a local resident how do you expect me to make a constructive judgement on your proposed plans if I am denied vital information at the public consultation?</p> <p>I believe you have failed to meet the guidelines detailed in the YOU GOV. framework of consultation procedures and also the Rural and Planning Institute recommendations; and believe you should suspend this consultation until such time that you are prepared to be transparent with your information.</p> <p>Failure to supply adequate information would leave you open to investigation by the Local Government Ombudsman.</p>	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a</p>

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					consultation event. We will ensure that the base maps used in the emerging Local Plan are the most up-to-date versions available to us.
	LPPO5069	1.8	Comment	I attended the drop-in centre at Stourport Civic a couple of weekends ago and found it a complete waste of time - any questions that I asked while I was there were answered by flicking through the Plan document itself which, to be honest, I could have just done myself and this gave me no more information than what I had read prior to coming to the drop-in.	Comments noted.
	LPPO5070	1.8	Comment	<p>My original objection, sent to LPR by e-mail on 13th July, “Local Plan Review, Option B”, was initially based on the following early information through my front door. (In no order of delivery significance to me.)</p> <ul style="list-style-type: none"> • <u>Aggborough & Spennells Independence Team</u> (4no. A4 papers) • <u>Spennells Conservative Party</u> (1no. A4 paper.) • <u>WFDC – Local Plan Review</u> (1no. B5 paper.) Directing to libraries, hub – presumably for hard-copy of plans and proposal’s, (that should have been mail-shot, at least to the Spennells populace.) Then all other information to a digital source for the same drawings and other written word. (Again another presumption that there is access for the 	Comments noted.

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				<p>majority to the digital source.)</p> <ul style="list-style-type: none"> • <u>Spennells Pensioner</u> – “Spennells Green Belt is at Risk.” • <u>Spennells Pensioner</u> – “Spennells Against Further Expansion.” <p>All of these five sources of perceived relative information seem to trip over each other in one aspect or another depending on which side of the argument one is tending to favour.</p> <p>Since my objection was submitted, other lengthy papers have been introduced – again with contradictions by way of interpretation. Plus an awful lot of apparent supposition, if developers have been named – Cox and Persimmon, then one can guess that a lot more developers have shown an interest, and deals have been ‘Done – subject to approval’.</p> <p>I think it should be reiterated that from the very beginning of this Planning Review, that the time scale is based on proposals and public consultation for a couple of years and then a projected time lapse of fifteen years to execute the plans. Then remember that Wyre Forest is not the biggest conurbation in the country and that its aspirations should reflect that of a relatively small rural district of three quite independent towns.</p>	
	LPPO4793	1.8	Comment	Comments on the consultation process.	Comments noted.

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				<ol style="list-style-type: none"> 1. The AS flyer distributed by post was delivered with junk mail 2. Document is difficult to navigate 3. One paper copy in each library is not inadequate 4. The drop-in session in Bewdley was very crowded, more and longer sessions would have helped. 	
	LPPO276	1.8	Comment	<ul style="list-style-type: none"> • Preferred Options should be left till after October 30th 2017. • The reason being Gladman developments appeal will be decided by then. • If they win there appeal for nearly 200 houses there will be no need to take land from the Green Belt. • With there success rate at these appeals we should wait till after the appeal decision. 	<p>The Gladman Appeal Public Inquiry was held during October 2017; however the Planning Inspector who conducted the Inquiry did not publish his decision until March 2018. The appeal was dismissed.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan in place. Therefore, we have to progress with our emerging Local Plan, but in this case the outcome of the Public Inquiry has been considered.</p>
	LPPO2106	1.8	Comment	<p>I am sceptical about the process as I only found out about plans to build on the Green Belt via a sign by Persimmon’s telling me not to enter the fields because it was now private property owned by them. Only after questioning social media did I find out about the consultation (to be held in the Summer holidays!). It made me feel like this was being kept quiet! Why didn’t I know about it and how many others haven’t known about it until quite late on in the process?</p>	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to</p>

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					<p>come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
	LPPO3004	1.8	Comment	<p>In my opinion, WFDC did not provide residents with enough information. Many residents will either not have seen, or realised the importance of the small, 'flyer' style leaflet. Many residents are still not aware of the 'Local Plan' and how it might affect them. More detailed information, along with a comments form, ought to have</p>	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14th August at 5pm.</p>

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				<p>been sent to residents. This would have given everyone a fair chance to comment, including those unable to attend meetings, and those without internet access etc.</p>	<p>During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
	LPPO5077	1.8	Comment	<p>Having attended the <i>planning review</i> debacle at Heronswood School yesterday afternoon, I would like to give my conclusion regarding this presentation.</p> <p>On entering the room there was an emphasis as to</p>	Comments noted.

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				<p>demonstrate the positives of living in Wyre Forest, especially Kidderminster.</p> <p>I've only lived in Kidderminster a short period of time, and it doesn't take a great deal of imagination to realise Kidderminster is a deprived, run down under invested town, with basically nothing going for it other than beautiful local country side, which you now intend to decimate and to encourage more people to come and live here.</p> <p>Your colleagues from the Planning Office were asked numerous question regarding the proposed plans and the options being put forward, the general consensus was "they were unable to answer many of the question asked, people found this very frustrating and annoying as YOU the council will be making decisions which will have an enormous impact on all of us living within this proposed development area.</p>	
	LPPO273	Local plan review housing development options	Object	<p>I would like to comment / object regarding P194 the proposed development of Lea Castle.</p> <p>I object to Options A & B on the grounds that there is a lack of local infrastructure to support this. In terms of schools, doctors' surgery, shops and transport Cookley is already at capacity. The access and highways infrastructure would also not cope with the additional traffic and some additional visibility splays and traffic</p>	Objection and comments noted.

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				<p>lights will not do anything to help this.</p> <p>600+ houses in the Lea Castle area would need an additional School and Dr's surgery. Cookley Sebright is full and has no room for expansion. It has no usable playing field, to expect it to take more children is ludicrous. Additionally the Dr's surgery is so busy it is hard to get appointments. The nearest High School is the smallest in the district - how will these schools cope with the proposed additional demand these options suggest??</p> <p>I would like to object to Option A in that it would effectively link Cookley to Kidderminster making it an extension of Kidderminster. In the local plan Cookley is referred to as an extension of Kidderminster, it is not, it is a village. As a separate village it should be allowed to expand in line with its own needs. In being asked to accommodate 600+ houses it is expanding to Kidderminster's needs and being expected to carry this burden on its already stretched infrastructure.</p> <p>While I agree that a development of the Lea Castle site is needed this needs to be done more sensitively with a view to supporting local infrastructure and need. The current plans do not do this.</p> <p>Local action groups are recommending development of Lea Castle but Cookley is a village. It is not an extension of Kidderminster and it should not be sacrificed to</p>	

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				<p>support Kidderminster's needs.</p> <p>As per the NPPF as outlined in the proposal, Green Belts serve various purposes such as checking the unrestricted sprawl of large built up areas, preventing the neighbouring towns merging into one another, assisting in safeguarding the countryside from encroachment and preserving the setting and special character of historic towns. I cannot see how either Option A or B will do anything other than go against these purposes listed.</p>	
	LPPO128	1.8	Object	<p>Maps were either distributed previously at the consultation, or not supplied.</p> <p>The plastic display boards were badly designed as the maps were all below waist height so had to squat down to see them, I am an OAP and the development officer asked me to stand as he was struggling – poorly thought out.</p>	<p>We will take these comments about the conduct of the consultation on board and will consider these issues next time we undertake a consultation event.</p> <p>Note that chairs were available at nearly all of the drop-in sessions we held (except for 1 drop-in session).</p>
	LPPO611	1.8	Object	<p>Your consultation website does not support https protocol</p> <p>For a local government website to not protect users data by encrypting traffic in 2017 is woefully inadequate</p>	<p>The online consultation website was an externally hosted site. We have informed them of this issue and future consultations will use the https (secure protocol).</p> <p>In terms of the Councils website, the Council is looking into the use of https for its main website.</p>
	LPPO3936	1.8	Object	The plan and accompanying documentation does not	It is disappointing to read that you are

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				<p>provide residents with a balanced view. This is supported by the fact that initially no 'drop in' session was planned for the Spennells area, an area which would feel the greatest impact if Option A were secured.</p> <p>With regard to the process of the WFDC consultation, I feel that it has been:</p> <ul style="list-style-type: none"> • <u>Untimely</u> (School holidays would possibly mitigate against full participation. A September start date would have been preferable.) • <u>Limited</u> ('Drop ins' where planners clearly favouring one option, therefore a distinct lack of impartiality. Literature which provided a broad brushstroke of the Local Plan, again emphasising the value of the infrastructure package, despite no detail regarding the proposed Eastern Relief road) • <u>Filtered</u> (It would appear that accessibility to information to guide residents' thinking was comparable to a post code lottery. Many communities around the district, even now, pleading for more time to consider the issues, as feeling not fully informed) • <u>Unequal</u> (Areas of Wyre Forest excluded from the Draft Local Plan, e.g. Blakedown, Churchill, Wolverley. Individual District Councillors, have, as a result of their particular roles and responsibilities, attended Parish Council Meetings. I assume there is agreed Council protocol/code of practice, regarding how Parish Councils are updated on District Council matters, in order to ensure equality of access to information) • <u>Discriminatory</u> (The Wyre Forest Draft Local Plan and 	<p>not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet.</p> <p>We will however take your comments on</p>

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				<p>Objective Assessment of Housing Need Report has been available online. Hard copies of these documents have been available in the library. No consideration has been given to maybe elderly residents who are either not conversant or familiar with accessing information online, and may face difficulties in visiting the library. The entire Draft Local Plan is 206 pages and OAHN is 176 pages. Could not summaries been made available? The Council also seem to have overlooked residents with disabilities, in particular those residents with a visual impairment. There is a charity, Wyre Forest Talking Newspaper, which could possibly have helped.)</p> <p>Wyre Forest District Council, as a body, have not offered a presentation of the Draft Local Plan, hosted possibly at Kidderminster Town Hall, or to secure further improved engagement, in local High Schools, across the District, namely Stourport, Bewdley, Wolverley. This would have provided for' face to face' questions to be raised by the electorate.</p> <p>To summarise, I believe the consultation process has been inadequate.</p>	<p>board and will consider these issues next time we undertake a consultation event.</p>
	LPPO3385	Option A	Object	<ul style="list-style-type: none"> The draft plan consultation period began at peak holiday time and coincided with the approval of the Blakedown Neighbourhood Plan. Blakedown and Wolverley should be included in developments. 	<p>The minimum requirement for a Local Plan consultation event is 6 weeks; the Preferred Options consultation ran for 8 weeks. This gave members of the public an extra 2 weeks than normal to respond. We will however take your</p>

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					<p>comments on board and will consider these issues next time we undertake a consultation event.</p> <p>Comments on Blakedown and Wolverley are noted.</p>
	LPPO2748	1.8	Object	<p>Consultation evening held at Heronswood Primary School on Monday July 10th. Different answers to the same questions were given depending on who one spoke to, whether a local councillor or someone from the planning office. I was told “It is not 1700 houses <u>only</u> 900”, as if 900 houses is a small number.</p> <p>At the beginning of the local plan it states: “Virtually static population growth”.</p> <p>So why does the Wyre Forest need these houses?</p> <p>The timing of this consultation could not be worse. School holidays are personal holidays taking place. One might think that this was deliberate on the part of Wyre Forest District Council in order that residents would not have the time to take notice of the proposed plans and or to object and protest against the plan.</p>	<p>The minimum requirement for a Local Plan consultation event is 6 weeks; however, the Preferred Options consultation ran for 8 weeks to take account of the school holidays. This gave members of the public an extra 2 weeks than normal to respond. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p> <p>The local authority has a statutory duty to produce a Local Plan. The Local Plan looks at the future growth over the next 20 years. The population continues to expand due to births, migration, and an aging population that continue to stay in their own home. This all puts pressure on the housing need for the area. The Local Plan has to cater for this housing need and plan for the future growth. There are a number of evidence base studies that have and continue to inform</p>

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					the emerging Local Plan, including the Objectively Assessed Housing Needs (OAHN) study.
	LPPO2972	1.8	Object	The consultation process is flawed. The people are not being asked what they want, they are being given two options only, neither of which are acceptable. I have not heard of any surveys being done to find out what people want. People had to demand more drop-in sessions. There is no real plan. A new eastern bypass <u>may</u> be built by the County Council? There <u>may</u> be a new school if one of the developers builds more than 1,000 homes in one place? Health provision is overlooked? Planning officials at the drop-in session seem not to know the local area.	Objection and comments noted.
	LPPO2240	1.8	Object	Objects to the process and the unfairness of expecting the general public to arrive at a conclusion and wants WFDC to <ul style="list-style-type: none"> • Suspend “Drop in Sessions” • Revisit the LPDR • Provide more comprehensive mapping 	Objection and comments noted.
	LPPO4473	1.8	Object	Lack of information. We only found out about it when a neighbour told us on Sunday 7th August and the consultation was held when people were away on holiday. The entire process should be restarted in the autumn with better communication from the council.	It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14 th August at 5pm.

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					<p>During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
	LPPO4475	1.8	Object	I was shocked that the Council provided no official notification to our home about the proposed large scale development in Stourport. I only found out about the	It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options

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				<p>matter when a kindly neighbour places a note through our door in the last few days.</p>	<p>consultation was conducted. There was a full 8 week public consultation which closed on Monday 14th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>

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	LPPO4489	1.8	Object	<ul style="list-style-type: none"> • Spennells drop-in session was disorganised and chaotic and we were ill-informed about • Neighbourhood plans with councillors have a lot of involvement with are crucial to deliver the local plan - councillors main aim is to ring-fence their areas from the plan - 'Nimbyism' or what? • Some parishes have been working on their neighbourhood plan for years having many chances to re-submit it and having it adopted by WFDC before the consultation period had ended - down to inside information and not good fortune. • Kidderminster has no neighbourhood plan - counsellors should have made Kidderminster Town Council pursue this. • Little information on the eastern link road at the drop-in sessions despite being integral in plans. • Hard to discover support/advice to different areas in Wyre Forest - fears that areas are treated differently due to councillors input from their many different roles. 	<p>The Spennells drop-in session was the first drop-in session the Council held during the consultation event and there was a very good turnout of people. We learnt from this first drop-in session and improved the other sessions by providing more Officers, improving the displays and providing sign-posting to direct people into the event.</p> <p>Neighbourhood Plans are not prepared by the Council but we do have a duty to cooperate with any Parish or town Council that wishes to prepare a Neighbourhood Plan. The decision on whether to prepare a Neighbourhood Plan is up to the Parish or Town Council.</p>
	LPPO4592	1.8	Object	It is not in accordance with the guidelines for Public Consultation and falls short of both YouGov and Rural and Town Planning Institute best practice and needs to be revisited.	Disagree. The consultation ran for 8 weeks, which is two weeks extra than the minimum requirement. The documents were made publically available throughout the whole of the consultation period, both online and in hard copy form at public venues. There

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					were 8 drop-in sessions with Officers attending to answer questions and display information.
	LPPO4630	1.8	Object	Timing of the local drop-in sessions during the beginning of the school holidays and "factory fortnight", which is perhaps the busiest time of year, when many people are away on holiday, is frankly disgusting! I appreciate that details could be found on your own website but without a reason to go there, without that initial knowledge, why would anyone look?	It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14 th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.
	LPPO4633	1.8	Object	I must raise my concern about the lack of publicity regarding the plan. Until Thursday evening I was	It is disappointing to read that you are not entirely satisfied with how the Local

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				<p>blissfully unaware of the revised plan and impending planning meeting.</p> <p>I am currently on holiday and trying to read a 200 documentary page document on a mobile phone is not ideal.</p>	<p>Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p>
	LPPO4689	1.8	Object	<p>The consultation process was terrible, Spennells School was filled with residents with only two planning people to speak with. Most of us didn't get a chance to ask any questions to clarify plans or put our views across. The area to be developed was tiny to view on the maps. No plans were given as to where roads would be created. The deadline for views to be given in is over the school</p>	<p>Disagree that there were only two planning officers present at the Spennells event – there were in fact several officers from the planning team present at this event to answer questions but the number of residents attending was greater than what we had</p>

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				holidays and in August when most people are away on holiday. It all gives the impression that planning options have already been decided and the public's views and residents of Spennells views are unimportant to the process.	anticipated. However, as it was our first drop-in session we did learn from this experience and provided more officers at the next drop-in sessions which ran a lot smoother.
	LPPO4748	1.8	Object	I do not feel the consultation process to be fair, inclusive or within the spirit of the NPPF. I have had to actively seek access to all documents that have helped shape my opinion – even requesting that documents were correctly, chronologically ordered on WFDC portal. The language and terminology used can be at best described as ambiguous. This would have negated many residents being able to fully comprehend the magnitude of the proposed options.	The Preferred Option Plan and the supporting evidence base documents were made available on the Council's website for public viewing throughout the whole of the consultation period, and remain on there now. The documents were also available at the eight drop-in sessions held throughout the District during the consultation event. Hard copies of the Preferred Options Plan were also available at the Council Hub and local libraries in the District.
	LPPO4772	1.8	Object	This consultation has not been forthcoming with any detailed information. No clear information, detailed road plans and answers to questions raised by the local population have been forthcoming. With ref to the roadshow at Heronswood School no representative was available from the Highways to discuss the proposed road, the layout and effect on the local population. The local planning officers did not know or was unwilling to pass on any information, the only reply was "it's only a draft plan at the present time"	As the Preferred Options was only the second stage of plan-making, not all the information was available as further evidence base studies needed to be undertaken, such as the Transport Modelling. The next stage of plan-making which is known as the Pre-Submission stage will provide further detail. The Transport Modelling work will also be available at this next stage.

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				well we need to know.	
	LPPO2693	1.8	Object	<p>Flawed Nature of the Consultation</p> <p>a. When the Consultation commenced, there was no intention to hold a drop-in session for Spennells. Even though potentially most affected group. This omission cannot be accidental.</p> <p>b. Consultation deliberately timed to include the end of July and half of August. Can only be assumed to be timed to reduce the opportunity for those who will be affected to scrutinise the plans.</p> <p>c. The Draft Local Plan and the OAHN are extremely complicated and not designed to allow ordinary people to understand them and have a fair opportunity to agree or disagree. The figures in them are mixed and different figures for the same item appear in different places. The figures that I have chosen to use seem fair but I could have chosen others from within the documents.</p> <p>d. The Consultation is very much aimed at getting a response from the question – ‘Do you want plan A or plan B?’. This is a totally flawed approach attempting to bludgeon people to accept what they consider to be the least worst option. The third option of rejecting the entire plan should have been made crystal clear.</p> <p>e. At drop-in session, officials were loath to discuss the relief road. They insisted that a plan does not exist. The Chair of Planning then added that we had no right to see the road plan as it wasn’t part of this Consultation. This is an utterly incorrect approach. It is impossible for citizens to give their backing to the destruction of the</p>	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. In particular, the drop-in session held at Spennells was very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council’s website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your</p>

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				Green Belt without full understanding of the consequences. To defer this discussion until after the land has been taken out of the Green Belt is totally wrong. Overall this has been a totally biased and unfair consultation. The current Draft Local Plan should be rejected in its entirety.	comments on board and will consider these issues next time we undertake a consultation event.
	LPPO2887	1.8	Object	<p>There has not been sufficient consultation for such a far reaching plan. Timescales insufficient to enable residents to consider the implications, or comment.</p> <p>Consultation portal difficult. Paper consultation form off-putting especially identifying paragraph. Timing of the consultation period being in peak holiday period with meetings being held in 'office hours' when people are at work. Process should be high profile, easily accessible for all residents and totally transparent. This process has failed and the consultation process should be extended. Loss of our Green Belt is a major issue for all residents of Wyre Forest and as a result should be treated as a special case with an extended consultation period.</p>	It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14 th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on

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					<p>the TV news.</p> <p>In terms of responding to the consultation, there were several methods of submitting responses to us, but the online digital approach is always encouraged as it saves officer time in dealing with the consultation responses and is also more environmentally friendly as it saves paper.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
	LPPO5004	1.8	Object	<p>We only found out about the proposals on 23rd July 2017. This was from a note drop by Councillor David Little encouraging us to attend a drop in consultation on 29th July. If it wasn't for him, we would have no idea about the plans.</p> <p>We notified residents the field side of Burlish Crossing, all residents on Bewdley side of the lights and all the houses that back onto the fields. We informed them of the proposals and encouraged them to go to the consultations and gave them the dates. Everyone we</p>	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well</p>

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				spoke to said that they had not received any notification about the proposals, although some had received the note drop from Councillor David Little. I'm very disappointed about the lack of consultation time given and that all dates in the consultation period fell into the first 2 weeks of the summer holidays, when many residents are away and half of the dates had already passed by the time residents were informed, preventing them from engaging in the process.	<p>attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
	LPPO5079	1.8	Object	I feel that the whole process of this 'consultation' has been designed to confuse the local population. I have 2 adult daughters living in Kidderminster, neither of whom had the original green leaflet delivered to their homes. They would not have known about any of this had I not told them. The consultation period has been planned for a time when many people are on holiday. The meetings have been arranged for times not suitable for all to attend, and at small sites. The meeting I attended was packed meaning I could not see the information clearly	It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14 th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the

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				<p>or speak to staff. The staff I heard speaking to others seemed to know very little and were unable to answer questions posed. The process has been designed to pit residents against each other by choosing Option A or B. There was no mention in the wording of objecting to both options. Why were residents not consulted about the so called Core areas which appear on both plan options?</p>	<p>drop-in sessions were very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p> <p>With regards to the 'Core Sites' they were consulted on during the Preferred Options. The 'Core Sites' were common to both Option A and Option B – however comments could still be made on the 'Core Sites'.</p>
	LPPO4333	1.8	Object	<p>You have made it very difficult to comment. The web pages are not user friendly, neither is this form. The idea</p>	<p>There were several ways in which people could comment on the Plan. The number</p>

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				that my comments should relate to a particular page number of a 195 page document beggars belief; I have however been to a consultation meeting, talked with officers and perused the documentation.	of responses we have received proves that this has been successful.
	LPPO4745	1.8	Object	Having spoken at the drop in session with planning officers I felt that they preferred Option A as it is the cheapest and I felt that we were not getting a fair and open choice. They were unable to answer specific questions, felt the road would not be used by trucks or as a cut through, both of which are a given, in order to avoid the Black Bridge and most staggeringly nobody from the Highways was available to discuss these issues. It was also sounding as if the Council had decided but were following protocol in order to say they had listened to the residents and concerned parties, although it had been noted that until the Local Councillor spoke up Spennells were not deemed important enough to even be given a drop in session to see the proposals. This again looks as if a deal has been struck and we have no say. I may like to point out that the Council are elected by the people and can easily be unelected, especially after hearing some of the County Councillors remarks. I also feel that we have not been given all the relevant facts and details which points to a flawed consultation.	The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.
	LPPO4873	1.8	Object	I think I speak for many when I say that these proposals have come as quite a shock to the local residents, there has been talk of the Council informing us with a leaflet or a mention in the local paper. This appears to have gone unnoticed by the majority of locals, and it seems	It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which

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				<p>we now have an unreasonable consultation period in which to voice our concerns and consider in a balanced measure “the people's “objections. It is unfair to pursue a campaign in which we lose our beautiful countryside through ignorance, whilst others stand and keep their ground having been better informed. It appears we now have an inordinately small and derisory period of time to rally and consider our rights as landowners and citizens of this district to express our thought and beliefs on this matter.</p> <p>Hence I would like to add my strong objections to the deadline you imposed on us for this building project which appears to be a most ill conceived set of plans.</p>	<p>closed on Monday 14th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council’s website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
CORE11	LPPO144	1-8	Support	Support for paragraph 1.8.	Support is noted.
	LPPO5005	1.8	Support	Firstly, thank you for taking the time and trouble to put	Support and comments noted.

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				the presentation together on 26th July at Areley Kings Village Hall. It was very informative and a great way to get lots of detailed information to the public.	
	LPPO3715	1.11	Object	The level of development is entirely dependent upon the OAHN which uses subjective assumptions to derive the recommendations. The document has no clear line of sight from its source data to its final conclusions bringing in figures at table G1 without justification.	Since the Preferred Options consultation, the Government has introduced a Standardised Methodology. The OAHN study is therefore being revised to use this new standardised methodology.
Education & Skills Funding Agency	LPPO1050	1.12	Comment	ESFA encourages close working with LPAs during all stages of planning policy development.	Comments are noted.
	LPPO3716	1.12	Object	There is no methodology to demonstrate the process by which the Council will actively consider the comments from the Consultation at all. There is lack of democracy and the process is flawed.	The Statement of Community Involvement (SCI) sets out how the Council intends to engage with local residents during consultations on Development Plan documents. The SCI is available on the Council's website for public viewing.
CORE11	LPPO145	1-13	Comment	The legally compliant and soundly based should refer to the statutory CORE STRATEGY as the NPPF is not a statutory instrument.	Disagree. The Local Plan Review will be replacing the currently adopted Core Strategy. At Examination, the emerging Local Plan Review will be tested against the soundness test as set out in the NPPF para 182.
Land Research & Planning	LPPO538	1.14	Comment	Land should be designated for housing development adjacent to or on the outskirts of smaller	As part of the Local Plan Review process we are considering affordable housing

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Associates Ltd				<p>settlements should the landowner offer at least 50% affordable homes and/or starter homes.</p> <p>WFDC is no different to the majority of other Local Planning Authorities in that the provision of affordable homes is falling further and further behind when Government is encouraging and supporting them</p>	and there will be policies in the Local Plan which stipulate the affordable housing requirement expected from sites. This will be based on evidence, which includes the revised OAHN study and the Viability Assessment.
	LPPO305	1.14	Comment	<p>I am fully supportive of this consultation document.</p> <p>I must stress that as well as larger housing and infrastructure requirements, it is vital that smaller locality based needs are addressed. I live in a small hamlet just outside Blakedown/Belbroughton/Hagley. The majority of the houses in this area are large family homes, or small cottages. There are many elderly residents that wish to downsize to suitable accommodation to suit their retirement needs and varying degrees of disability. They wish to stay in the area they have lived in for many years.</p> <p>It is vital that smaller individual sites are looked at to see if those needs can be accommodated as there is a distinct lack of bungalows and the type of property they need. Please ensure that this is included in the local plan assessment.</p>	Support and comments are noted.
CORE11	LPPO146	1-14	Support	Support for paragraph 1.14.	Support is noted.
CORE11	LPPO147	1-15	Support	Support for paragraph 1.15.	Support is noted.

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	LPPO416	1.16	Object	<p>I object to Option A and Option B</p> <p>Green Belt land should be used only as a VERY LAST RESORT.</p> <p>The 5 year rolling time frame should allow for regular reviews of brown field sites and enable changes to be incorporated into the plan.</p> <p>Why are unnecessary decisions being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping?</p>	<p>Objections noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>We will be undertaking reviews of the Local Plan in the future, in line with Government requirements. Future Local Plans may also require Green Belt release if the housing need cannot be accommodated on land not in the Green Belt.</p>
Land Research & Planning Associates Ltd	LPPO535	1.17	Comment	<p>By increasing the existing major conurbations for housing leads to the rural settlements becoming the "Cinderellas" of the planning system. It creates social divide and risks rural settlements not remaining sustainable and simply dying away because of an ageing population.</p>	<p>Comments noted.</p>

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				The expansion of rural settlements should be proportionate to that of the major settlements and this PO document is not sufficiently balanced to take account of this.	
	LPPO391	1.16	Object	<p>I object to Option A and Option B.</p> <p>Green Belt land should be used only as a VERY LAST RESORT.</p> <p>The 5 year rolling time frame should allow for regular reviews of brownfield sites and enable changes to be incorporated into the plan.</p> <p>Why are unnecessary decisions being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping?</p>	<p>Objections noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>We will be undertaking reviews of the Local Plan in the future, in line with Government requirements. Future Local Plans may also require Green Belt release if the housing need cannot be accommodated on land not in the Green Belt.</p>
	LPPO3547	Whole Plan	Object	I object to the whole plan.	Objection is noted.

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Land Research & Planning Associates Ltd	LPPO536	1.18	Comment	<p>The PO should take better account of the lack of affordable homes and introduce a Policy where if land owners are willing to provide land near or adjacent to smaller rural settlements to accommodate a minimum of 50% affordable homes and/or starter homes this land should be designated in the PO particularly on the western side of the WFDC area which is not in Green Belt.</p> <p>It is not in compliance with the fully objectively assessed needs for market and affordable housing as the provision. Of the latter has not been properly addressed in the PO land/sites designation.</p>	As part of the Local Plan Review process we are considering affordable housing and there will be policies in the Local Plan which stipulate the affordable housing requirement expected from sites. This will be based on evidence, which includes the revised OAHN study and the Viability Assessment.
Environment Agency	LPPO1187	Water Cycle Study	Comment	<p>It is imperative that a robust WCS is in place to inform a 'sound' plan that fully recognises the timings and costs associated with infrastructure planning in the water environment. Securing effective water resource policies and allocating development in appropriate areas, with adequate infrastructure in place (or planned), is an important element of the strategic planning remit.</p> <p>Site BR/RO/1 at Clows Top has issues with mains drainage connection and we have previously raised concerns with Severn Trent about the appropriateness of a non-mains foul drainage scheme in this location.</p> <p>We note table 10-1 of the WCS highlights some physical wastewater infrastructure capacity constraints in red. Whilst this does not appear to imply a significant barrier</p>	<p>The Water Cycle Study will be updated following the preferred options consultation and as part of the pre-submission plan stage. These comments from the EA will be considered as part of the WCS update.</p> <p>As part of the WCS update we will consider changes to the policy / guidance and plans, which will include the adoption of TAL as mentioned in this consultation response.</p> <p>We are not proposing to undertake any additional water quality modelling at this stage.</p>

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				<p>to development, we trust Severn Trent Water Limited will confirm following their further assessment. On this basis we have no significant cause for concern in relation to environmental infrastructure matters, related to water quality, as a result of the proposed development growth. We therefore consider the evidence base document robust enough to inform the Plan.</p> <p>In section 6.1.8 of the report, reference is made to the phosphate (P) treatment trials due to be completed in 2017. Wording in section A.10.8 and 6.1.8 could be amended. Although TAL is 0.25 it could still be possible to achieve the required P limit; so this should not prove a barrier to proposed growth.</p> <p>In Table 7 the WwTW future growth concentration is still reported as 4.94. We question whether this should have been updated to reflect the current observed P concentration of 0.63 (as in table 8). Note this has not impacted on the River Quality Planning (RQP) result.</p> <p>We would also question whether the BOD River target in table 13 should be 'high' rather than 'good' status.</p> <p>We note strong recommendations are made to utilise SuDS for surface water drainage from development, and we support this approach. We also support the fact that all aspects of sewerage network constraints, sewage treatment works capacity and related issues such as odour and flood risk from increased waste water</p>	

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				discharges have been considered.	
Persimmon Homes Limited	LPPO1599	1.18	Comment	<p>Paragraph 182 of the NPPF - must adhere to in order to meet the tests of soundness, Plans must be positively prepared, justified, effective and consistent with national policy.</p> <p>Concern with the current drafting of the local Plan which needs to be addressed in order for the plan to be properly justified and effective as a tool to shape growth in the District. The Plan does not provide sufficient certainty that the Local Plan is capable of delivering growth which sufficiently boosts the supply of housing, as required by paragraph 47 of the NPPF and has not been prepared positively.</p> <p>Concern with proposed strategy in the Local Plan options and the distribution options proposed by the Council. Lack of housing provision in Bewdley, which have not been appropriately captured within the distribution strategy options. One new site (Catchems End) is proposed as part of one of the Council's options, this is tied up within a wider growth strategy that the Council to consider to be less sustainable than the preferred option. There is a risk that should the Council opt for its preferred option, Bewdley will not be assigned a level of growth appropriate to meeting the future needs of the town.</p>	Comments noted.

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Environment Agency	LPPO1186	SFRA	Comment	<p>Strategic Flood Risk Assessment (February 2017)</p> <p>We previously queried discrepancies between flood zones and 1 in 100 year event plus climate change outline in detailed site summary maps. Note that section 5 has been updated and describes limitations of 2D modelling including effect on conveyance of floodwater through culverts and bridges. We advise that detailed modelling may be required to inform site specific FRAs for sites in flood zones 2 & 3. Recommend that caveat is included for those sites affected.</p> <p>We previously identified lack of information on flood defences and climate change impacts. Note that section 4.6 of SFRA has been updated. We note that generally defences are expected to overtop increasing extent and depth of flooding. SFRA confirms detailed site specific FRAs should determine the extent of flood risk impacts on developments with regards to issues such as the setting of appropriate finished floor levels.</p> <p>Section 4.6 notes effects of climate change on some sites - BHS/11, BHS/16, FHN/9 which benefit from Kidderminster Flood Alleviation Scheme. SFRA confirms that residual risk should be addressed in site specific FRAs. Advise that caveat is included for site allocations.</p> <p>Note that section 7 includes further detailed assessment of climate change including implications for development and residual risk. Modelled outputs have</p>	<p>Comments are noted. The SFRA will be updated for the Pre-submission stage and these comments from the Environment Agency will be considered and actioned in the update. The updated SFRA will be used to inform the final site selection.</p>

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				<p>been used to give indication of risk of flooding above existing defence standards of protection and how climate change may affect this. The structural safety of dwellings and structures is also assessed.</p> <p>However, we have concerns that River Stour/Severn confluence has not had modelling done to assess flood scenario on River Stour. Site specific FRAs should investigate this to ensure safe development.</p> <p>Detailed site summary tables are comprehensive. However, table 12-1 does not include sites with ordinary watercourses such as OC/11, OC/12 and OC/13. These need to be assessed to inform flood risk. According to our maps, WA/BE/3 has a main river through the site with areas of FZ1, 2 & 3. Table 12-1 states that 100% is in FZ1. This site should have been carried through to Level 2 Assessment.</p> <p>For site allocations which include areas of Flood Zones 2 and/or 3, we recommend your Council are satisfied there is sufficient land available within Flood Zone 1 to accommodate the proposed development (i.e. number of houses or hectares (ha) of employment land).</p>	
	LPPO3717	1.18d	Object	<p>The proposals are unsustainable to continually allocate development land. We live on an island with finite land. What will the Council do when all of the land is used up – think of solutions that should have been put in place now? This simply passed the ultimate solution to our</p>	<p>Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need.</p>

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				children because the present Council is incapable of planning outside a never ending supply of land.	
	LPPO417	1.18	Object	<p>I object to Option A and Option B</p> <p>Green Belt land should be used only as a VERY LAST RESORT</p> <p>The 5 year rolling time frame should allow for regular reviews of brown field sites and enable changes to be incorporated into the plan.</p> <p>The plan fails in its stated aim to "to use a robust and up-to-date evidence base to ensure that the local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" instead it aims to justify what developers want to deliver rather than meet the needs of Kidderminster residents.</p> <p>Previous attempts to build an Eastern relief road have failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph limit road following the same route as the current road routed from the Worcester Road through Mustow Green to the Birmingham Road - is it really a relief road at all?</p>	<p>Objections noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>We will be undertaking reviews of the Local Plan in the future, in line with Government requirements. Future Local Plans may also require Green Belt release if the housing need cannot be accommodated on land not in the Green Belt.</p> <p>A transport study is being undertaken to inform the next stage of plan-making. This will provide evidence on what road improvements will be required to</p>

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					sustain the level of proposed development in the District. This evidence will help to establish if the 'eastern relief road' that was consulted on at preferred options is necessary or if an alternative solution can be reached.
	LPPO3668	1.18	Object	<p>I note you have omitted certain key requirements under the NPPF. I would draw your attention to the following:</p> <p>Section 4. Transport: <i>“Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. “</i></p> <ul style="list-style-type: none"> This has not been sufficiently evidence in your plan to support the vast increase in commuters who will most definitely travel to Birmingham and other key cities using public transport. Your proposals are insufficient to meet the proposed demand. <p>Section 8: Section 70. <i>“The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local</i></p>	Objection and comments noted.

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				<p><i>planning authority should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.”</i></p> <ul style="list-style-type: none"> • You have not shown sufficient evidence in your plan to meet the above requirements. Schools are in adequate and not sufficient to meet the needs of the number of additional residents proposed under the housing developments. <p><i>Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.</i></p> <ul style="list-style-type: none"> • I believe you have already begun negotiations with Persimmon homes and others before offering this. I will be submitting a freedom of information request <p>Section 8: <i>Section 76: Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.</i></p> <ul style="list-style-type: none"> • You have not evidence special circumstances. The fields at Spennells satisfy all requirements to 	

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				<p style="text-align: center;">be protected under Green Belt.</p> <p><i>Section 77 :The designation can be used where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field),tranquillity or richness of its wildlife;</i></p> <p>Section 9. Green Belt: <i>“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to <u>prevent urban sprawl</u> by keeping land permanently open; the essential characteristics of Green Belts are their <u>openness and their permanence</u>. Green Belt serves five purposes:</i></p> <ul style="list-style-type: none"> • <i>to check the <u>unrestricted sprawl</u> of large built-up areas;</i> • <i>to prevent neighbouring towns merging into one another;</i> • <i>to assist in safeguarding the countryside from encroachment;</i> • <i>to preserve the setting and special character of historic towns; and</i> • <i>To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”</i> 	
CORE11	LPPO148	1-18	Support	Support for paragraph 1.18.	Support is noted.

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	LPPO471	1.19	Comment	We are part of the Greater Birmingham and Solihull LEP and we need to ensure any development is in keeping with the uniqueness of Wyre Forest District, I think that the need to increase our housing stock by such a large amount is to attract commuters from Birmingham and surrounding areas. This I think is not the best way forward for Wyre Forest District. Commuters will not bring income into our shopping centres or our tourism activities as they will be spending where they work and spending their leisure time in town.	Comments noted.
	LPPO418	1.19	Comment	<p>Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collectively review overall brown field site availability and plan housing development accordingly.</p> <p>Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years;</p> <p>Whilst economic development in Kidderminster will be welcome - past experience shows this will take time</p> <p>Artificial borders should not apply when making decisions to destroy the Green Belt.</p>	<p>Comments noted. The Black Country Local Authority areas are undertaking a joint Local Plan Review. Solihull Council is also undertaking a review of its Local Plan. Birmingham City Council adopted their Local Plan in January 2017. The other Worcestershire Local Authorities have started a review of their Local Plans. All of these Local Authorities will be looking at what brownfield sites they have in their Local Plan Reviews.</p> <p>In terms of the emerging Local Plan for Wyre Forest, we have looked at brownfield sites but we don't have enough deliverable brownfield sites to accommodate all of our housing need.</p>
	LPPO433	1.18 (d)	Comment	What percentage buffer will WFDC have to incorporate into the plan? What has the past performance of WFDC	The Inspector's report for the Gladman appeal public inquiry (published March

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				been?	2018) concluded that a 20% buffer should be applied to the Council's 5 year housing land supply calculation. However, the Council will follow National Planning Policy guidance on this matter which has been published since the appeal case.
	LPPO4897	1.19	Comment	The proposed Option A (and also Option B to a large extent), concentrates development along the eastern side of Kidderminster. A requirement of the Local Plan is that development should be proportionate to the capacity of the district. The potential of several thousand dwellings being built along this corridor is surely disproportionate.	Comments noted.
	LPPO3718	1.19	Object	It is preposterous to state that the two LEP's provides Wyre Forest with a range of opportunities to further enhance its economic position, access funding streams and ensure that the area is able to continue to look both towards the rest of Worcestershire and the conurbation in the same way that it has done for many years. It also brings a range of challenges in terms of ensuring that development is balanced, proportionate to the capacity of the District. This is the reason why Easter Park has laid 50% empty since construction, many of the shops in Oxford Street, Worcester Street and Coventry Street and others lay empty creating an eye sore of unattractive town centre environment and security problem at night. This is evidence that the planning team are not in tune with reality and how to address what is really required	Objection is noted.

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				<p>for the town of Kidderminster. There is little confidence in this plan and to the level of development planned for the area when they have struggled in the past to achieve ambition.</p> <p>I take note of the statement ‘...and does not undermine the unique character of the area’ which certainly would be the case if the proposed level of development goes ahead. There is evidence of a disconnect between what is proposed and what happens in practice. I object to the plan as proposed, the development should be scaled down to meet realistic demand and not to undermine the character of the area to become sole-less like Redditch.</p>	
	LPPO2933	1.19	Object	<p>Policies of the Local Plan Review do not seem to require flexible design and layouts ‘future proofing’ development so as to take account of important population changes such as ‘ageing’ over the plan period.</p> <p>Although the LPR states (1.19) that Wyre Forest housing market ‘constitutes a self contained Housing Market Area’, considering the statistics at table 8.0.4 and 2.9 the social issues of</p> <ul style="list-style-type: none"> • static population growth; • a very high proportion of resident aged 65+ • the need to ensure that residential development 	Objection and comments noted.

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				<p>caters for all groups in society’,</p> <p>It makes limited proposals for how this apparent lack of appropriate housing mix could be achieved (8.16, beyond bungalows for the 65+ age group). Higher quality homes and those that 65+ might be prepared to downsize to are not represented in any detailed way, although affordable housing is mentioned. Para 6.9 only refers to what ‘might’ happen, rather than what ‘will’ happen-seeking to address the management of supply in all its house-type range/ownership, via approved policies that follow through from the comments of 8.16. Where is adaptability for the future and building codes?</p>	
	LPPO393	1.18	Object	<p>I object to Option A and Option B</p> <p>Green Belt land should be used only as a VERY LAST RESORT</p> <p>The 5 year rolling time frame should allow for regular reviews of brown field sites and enable changes to be incorporated into the plan.</p> <p>The plan fails in its stated aim to "to use a robust and up-to-date evidence base to ensure that the local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" instead it aims to justify what developers want to deliver rather than meet the needs of Kidderminster residents.</p>	<p>Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>The Transport evidence base work that is being produced to inform the Pre-</p>

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				Previous attempts to build an Eastern relief road have failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph limit road following the same route as the current road routed from the Worcester Road through Mustow Green to the Birmingham Road - is it really a relief road at all?	Submission Plan will establish what road improvements the proposed new development will require and if an eastern relief road is necessary.
	LPPO395	1.19	Comment	<p>Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collectively review overall brownfield site availability and plan housing development accordingly.</p> <p>Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years;</p> <p>Whilst economic development in Kidderminster will be welcome - past experience shows this will take time.</p> <p>Artificial borders should not apply when making decisions to destroy the Green Belt.</p>	Comments noted.
Gladman Developments Limited	LPPO1572	1.21	Comment	Any issues of unmet housing need arising from relevant neighbouring and near-by local authorities must be fully considered through the preparation of the Local Plan, working under the auspices of the 'duty to cooperate'. This should involve all other LPAs in the HMA plus any others that there is a clear functional relationship with.	Comments noted. We continue to have Duty to Cooperate meetings with our neighbouring Local Authorities throughout the Local Plan making process.

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				<p>Where necessary, a strong policy mechanism will be required within the Local Plan to demonstrate that unmet housing needs arising from relevant neighbouring authorities and those with a clear functional relationship will be met during the plan period.</p> <p>In order to fulfil the objectives of the Plan it is essential that the relationship of the area with its neighbours is carefully considered and that the housing and economic development requirements of the wider area are fully explored and given appropriate consideration through the plan making process.</p>	
	LPPO4469	OAHN	Comment	Concern over the Housing figures - District stated as having stagnant population growth yet the Consultants have identified the need for so many new houses?	Comment is noted. The Objectively Assessed Housing Needs Study will be updated using the Government's new standardised methodology for calculating housing need. The latest population and household projections will also be used.
Taylor Wimpey West Midlands	LPPO4948	LI/5 - Green Belt Review	Comment	In Green Belt Review site is identified as making a 'contribution' to the purposes of the GB. "The site is part of large tract of land forming a substantial part of the open countryside between Stourport, Kidderminster and Bewdley which makes a significant contribution to preventing sprawl, merger of towns, encroachment and the identity of towns. Thus, in principle, development would constitute harm to the Green Belt, although the local geography modifies this. Overall the land does make a contribution	Comments noted.

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				<p>to Green Belt purposes, specifically in respect of sprawl and protection against encroachment into open countryside. The enclosed character of this site and its close relationship with the existing urban edge means that damage to the purposes of the Green Belt is reduced.”</p> <p>TW has considered release of site from GB within context of 5 GB purposes.</p> <p><i>1) To check the unrestricted sprawl of large built-up areas</i></p> <p>Site has strong defensible boundaries which would round-off town at this location. Northern part of site is not proposed for development so any development would be contained well within existing building line. It will ensure visual separation of Stourport and Bewdley.</p> <p><i>2) To prevent neighbouring towns merging into one another</i></p> <p>Considerable green gap between Stourport and Bewdley. Development would not close this gap.</p> <p><i>3) To assist in safeguarding the countryside from encroachment</i></p> <p>Site offers opportunity to provide strong and defensible</p>	

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				<p>boundaries.</p> <p><i>4) To preserve the setting and special character of historic towns</i></p> <p>Stourport's conservation areas and associated Listed Buildings are not located in vicinity of site. Release of site will not compromise setting of heritage assets.</p> <p><i>5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</i></p> <p>Release of this site would not prevent derelict and urban land coming forward. It can be phased in the housing trajectory to take account of availability and deliverability of brownfield sites.</p> <p>TW assert that site makes a 'limited contribution' to Green Belt purposes. Given the enclosed nature of the site and the prevailing building line and development limit to the north-east, the development of the site would not result in increased sprawl towards Bewdley.</p>	
Taylor Wimpey West Midlands	LPPO4950	Sustainability Appraisal AKR/15	Comment	<p>The site represents a sustainable location for development as evidenced within SA which forms part of Local Plan evidence base. The site has been scored against 13 objectives.</p> <p>TW broadly support the SA findings but feels SA objective 5 (reduce need to travel etc.) should not be '!'</p>	Comments noted.

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				but '+' as site is in sustainable location and a travel plan will be submitted for the development. Objective 8 (to protect/enhance landscape) - do not agree that development will have negative impact on landscape - no scheme details yet. There is more than enough space to provide significant landscape enhancements to improve relationship between urban edge and landscape. Suggest score is changed to '0' or '?'. Objective 13 (maintain/enhance settlement identity) - scores '-'. Disagree as scale of development is small within context of larger settlement. Development is capable of reflecting local character and identity through layout and use of materials.	
Campaign to Protect Rural England	LPPO956	1.22 HELAA	Comment	We have looked at all sites assessed as indicated by the Assessment sheets on the website. We have not commented on every site, particularly not those with an active planning consent or which are urban brownfield. The comments appear in alpha-numeric order by settlement. The views expressed range from supportive of the Council's position to hostile to it. Comments attached in separate document.	Comments noted.
Taylor Wimpey West Midlands	LPPO2249	Sustainability Appraisal site LI/5	Comment	The site represents a sustainable location for development, as evidenced within Sustainability Appraisal (SA), which forms part of the Local Plan evidence base. Taylor Wimpey broadly supports the findings. However, objective 5 (to reduce need to travel etc.), should be either a '+'. Feel that development can reduce need to travel as is in sustainable location.	Comments noted.

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				<p>Development will include submission of travel plan.</p> <p>Objective 8 - TW feel do not agree that site would have minor impact on landscape and townscape as no details of scheme are known at this stage. Significant landscape enhancements are likely. Suggest score should be '0' or '?'.</p> <p>Objective 13 - disagree with '-' score. Scale of development within context of Stourport is not significant so will not erode identity. Development is capable of reflecting local character through layout and use of materials. Consider site should score '0' or '?' at this stage.</p>	
Taylor Wimpey West Midlands	LPPO4920	OC/13 - Green Belt Review	Comment	<p>Green Belt: Land at Comberton Road lies within West Midlands Green Belt. Review of Green Belt undertaken by Amec Foster Wheeler assesses different parcels against Green Belt purposes.</p> <p>In response to this analysis, the LPRPO includes significant reinforcement of western boundary of site including large amounts of open space and landscaping.</p> <p>TW has considered the release of the site from the GB in context of 5 purposes of GB and concludes that sites makes a limited contribution:-</p> <p><i>1) To check unrestricted sprawl of large built-up areas</i></p>	Comments noted.

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				<p>Site boundaries would be reinforced by 30m planting buffer along length of development. This would strengthen urban edge. It would not encourage sprawl.</p> <p><i>2) To prevent neighbouring towns merging into one another</i></p> <p>Gap of >10km between Kidderminster and Bromsgrove. Site is located immediately adjacent to existing built-up area and is clearly separated from nearby settlements by extensive agricultural land.</p> <p><i>3) To assist in safeguarding the countryside from encroachment</i></p> <p>Site offers opportunity to provide strong defensible boundaries to protect countryside and maintain visual and physical separation between Kidderminster and surrounding settlements.</p> <p><i>4) To preserve the setting and special character of historic towns</i></p> <p>Kidderminster's conservation areas and associated listed buildings are not located close to site. Listed buildings scattered within village of Stone are closer and their sensitivity will be taken into consideration. Release of this site will not compromise setting or character of historic towns.</p>	

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				<p>5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p> <p>Release of this land would not prevent recycling of derelict and other urban land. Supply of brownfield sites is now reducing and development of this site can be appropriately phased within housing trajectory to take account of availability and deliverability of brownfield sites.</p>	
Taylor Wimpey West Midlands	LPPO4946	Sustainability Appraisal site OC/13	Comment	<p>Sustainability: Site represents sustainable location as evidenced in SA. SA has assessed site against 13 objectives. TW do not agree with scoring for objective 8- no details of a scheme are known so cannot assert that development would have minor impact on landscape and townscape. Scheme could provide significant landscape enhancements - score should be '0' or '?' at this stage.</p> <p>Taylor Wimpey supports the notion that the development of the site would enhance the provision and accessibility of local services and facilities as well as reducing the need to travel by unsustainable modes.</p>	Comments noted.
Taylor Wimpey West Midlands	LPPO4947	Sustainability Appraisal site OC/6	Comment	<p>Sustainability: Site represents sustainable location as evidenced in SA. SA has assessed site against 13 objectives. TW do not agree with scoring for objective 8- no details of a scheme are known so cannot assert that development would have minor impact on landscape and townscape. Scheme could provide significant landscape enhancements - score should be '0' or '?' at</p>	Comments noted.

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				<p>this stage.</p> <p>Site scores single negative against objective 9b - but with no scheme details known impact on protected species cannot be known at this stage.</p> <p>Taylor Wimpey supports the notion that the development of the site would enhance the provision and accessibility of local services and facilities as well as reducing the need to travel by unsustainable modes.</p>	
	LPPO4139	1.22 HELAA	Comment	<p>The HELAA Report draws on Government policy and makes a clear statement of how important it is to protect open green space for the health of the community. The report also shows that if the actual need for new houses was less than 3697, no Green Belt land would be required, and if the actual need were less than 4476, only brownfield Green Belt land would be required.</p> <p>8378 Green field Green Belt sites have been identified! This number obviously shows the absolute need to protect the Green Belt immediately and permanently.</p>	<p>The HELAA shows that if all the non-Green Belt sites came forward for development at the capacity stated, then 3696 dwellings could be provided. However, the HELAA also states at paragraph 3.1 that many of the urban brownfield sites are likely to come forward for a mix of uses and until further viability work is undertaken, the exact mix cannot be determined. Many of the site capacities are likely to be lower than shown. Also, not all of the listed urban brownfield sites will necessarily be available for residential development. Some may be retained for commercial uses.</p> <p>Open space, sports and recreational land is protected by policy. These are sites</p>

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					<p>outside of the Green Belt. The Green field Green Belt sites listed have almost all been submitted by landowners. In most cases, capacity has been calculated using a standard methodology as set out in the HELAA report. There is no suggestion in the report that these sites should be developed. All sites will be assessed against the full set of evidence studies and a decision on whether to propose allocation or not will be taken once the results of these different studies have been assessed. It should be noted that Greenfield Green Belt sites are not the same as open space, sports and recreational land.</p>
	LPPO4838	1.22 Green Belt Review	Comment	<p>My knowledge and interest are in the “Option A” proposals relating to the following areas:</p> <ul style="list-style-type: none"> • Rear of Spennells & Easter Park (AS/10) • Land off Stanklyn Lane (WFR/ST/2) • Stone Hill South (OC/13) – Part, the field to the south bounded by Stanklyn Lane, a PRoW to the west, a hedge to the north and a field locally known as “The Gallops” to the east. Carrots are currently being grown in this field. <p>The AMEC report commissioned by WFDC appears to be balanced although some of the detail is questioned. This</p>	Comments noted.

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				<p>is not reflected in the in the WFDC Preferred Options Document (POD) which seems to lean towards Option A. The POD does not acknowledge the full input and importance of this AMEC report as it is clearly a major piece of work identifying the sites. It is briefly referred to and does state that ‘these studies demonstrate that across the District the Green Belt fulfils its intended strategic purpose as part of the West Midlands Green Belt with many instances of more than one Green Belt purpose being fulfilled’.</p> <p>The AMEC Report clearly identifies significant encroachment and impact on the Green Belt, which, it claims, can be dealt with by “Masterplanning”. This is a very vague argument.</p> <p>There is no justification for demand based upon projected population increase as shown in the Worcestershire County Council research.</p> <p>The AMEC report notes that: ‘The most significant impact on the Green Belt is to the south east and north east of Kidderminster, the two locations which are the focus for much of the development. In each case the scale of development means that a new relationship between town and country will need to be created through comprehensive masterplanning. What is meant by the statement that ‘ ... a new relationship between town and country will need to be created through comprehensive masterplanning’ in my opinion can be</p>	

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				<p>interpreted any way required and as such is not a useful argument for or against option A.</p> <p>Land at Stone Hill (Part as described previously) OC/13; I cannot disagree with the statement that ‘.....although the scale and topography of the site means that a new relationship between town and country would be created, extending development into visually exposed land where thus far development has used the topography to limit such exposure. This is particularly the case for land extending towards Stanklyn Lane, in combination with proposed land immediately to the southwest, although further work on long and medium distance visual receptors would be needed’. It is not clear what is meant by the statement that ‘visual receptors would be needed’. If this part was developed on it’s own it certainly would be a rectilinear intrusion and sprawl into the Green Belt. The report fails to note the presence of National Grid electricity power lines and pylons crossing the site from Stanklyn Lane. These would inhibit development. The site falls towards Stanklyn Lane causing drainage problems but not in the Council or AMEC Reports. Successful crops of potatoes, onions and currently carrots are grown here.</p> <p>Land off Stanklyn Lane WFR/ST/2: I agree with the statement made by the AMEC report that ‘the site slopes from the plateau at 60m, which holds and conceals the urban edge, down to Stanklyn Lane and has extensive views south eastwards across open</p>	

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				<p>countryside’. It goes on to say that ‘the site has substantial hedgerow boundaries, apart from that abutting the urban edge which comprises garden fences, but is visually exposed to Stanklyn Lane because of its sloping aspect’. This last statement gives the impression that the urban boundary is exposed to Stanklyn Lane but it is not. In fact, this boundary is the boundary of the old Municipal Borough of Kidderminster as shown on historic OS maps The AMEC Report has already stated that it is concealed behind the plateau. In its existing form there is complete connection with the wider open countryside and the impression of urban sprawl is concealed. The statement that ‘...there is a degree of connection with the wider open countryside’ appears to me to be misleading. There is complete connection with Stanklyn Lane in the valley of the rolling countryside each side. I strongly disagree with the statement that ‘landscape character and condition is of average quality, but with some evidence of the withdrawal of active land management evidenced through poor crop growth (in contrast to arable cultivation on land immediately to the north east)’. The photographs in the report evidencing this were clearly taken some time ago. Some attempts at organic farming had taken place with what appeared to be limited success and there had been crop failures. The farmer currently working the land is having a successful crop of Barley and there have been other successful crops of sugar beet in particular. It is my understanding that the current farmer rents the land from the landowner and it must therefore be commercially viable.</p>	

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				<p>I would say that the character of the landscape is very good and not average as stated in the AMEC Report. I have seen flocks of linnets and the occasional yellowhammer and corn bunting amongst others. I understand these species of birds are endangered.</p> <p>Views from the plateau are magnificent with Brown Clee to the north, St Mary’s Church, Stone, and the Clent Hills beyond to the east and Abberley and Woodbury Hills to the west. The latter being the site of the encounter in 1405 between the armies of Owen Glendower and Henry IV.</p> <p>The AMEC Report goes on to state ‘that development would create a new urban edge to the town on south easterly facing site, although in combination with adjacent sites, masterplanning could mitigate the direct visual impact of development and hence perception of spillage of the town into open countryside’. In my view the use of the word “masterplanning” can mean anything you want and does not contribute to the argument one way or the other.</p> <p>The AMEC report continues: ‘overall the site makes a contribution to Green Belt purposes by virtue of its role in containing the southern edge of Kidderminster and having a strong visual connection with the wider countryside across Stanklyn Lane’. If the statement is referring to the current Green Belt I cannot disagree</p>	

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				<p>with it.</p> <p>Land R/O Spennells & Easter Park AS/10: I agree with the statement in the AMEC Report that ‘The site contributes to the Green Belt in this location, in combination with land to the east, containing the southerly edge of Kidderminster and connecting visually (in combination with adjacent land to the east) with the wider countryside to the south’.</p> <p>I disagree with the statement that ‘The site is well contained, level and not visually exposed, and as such development would not create uncontrolled sprawl overly intrusive encroachment into open countryside’.</p> <p>As shown on the contours of OS maps there is at least a 10m fall across the site towards Stanklyn Lane. The site touches the boundary with Wychavon District Council and if developed there would be no Green Belt on this boundary within Wyre Forest District.</p> <p>There is a high risk of flooding on the southern boundary. The site falls towards Stanklyn Lane causing drainage problems as previously discussed in my comments but not in the Options or AMEC Reports.</p>	
	LPPO4438	Growth	Comment	Wyre Forest has a population growth below the national average and within the guidance, Housing and Economical Development Needs Assessments 2015, it states that the ‘Assessing development needs should be proportional and does not require local councils to	Comment is noted. The Objectively Assessed Housing Needs Study will be updated using the Government’s new standardised methodology for calculating housing need. The latest

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				consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur'. It seems that the Council have over-estimated the number of houses required. In your own document, you state that there has been a virtually static population growth, so why do we need 4800 to 6000 extra houses?	population and household projections will also be used.
	LPPO2697	OAHN, HELAA,	Object	<p>Wyre Forest District Council contents of their own documents:</p> <p>Draft Local plan: <i>'Virtually static population growth.'</i></p> <p><i>'National Planning Policy Framework (NPPF) makes it clear that it is necessary for the evidence base for all Local Plans to be up to date.'</i></p> <p>Helaa:</p> <p><i>'2.20 The protection of open space is vital for ensuring healthy communities. Existing open space, sports and recreational land should not normally be released for development unless it can be demonstrated to be surplus to requirements, be replaced elsewhere or need for the development clearly outweighs its loss.'</i></p> <p><i>'2.21 Inappropriate development in areas of flood risk should be avoided by directing development away from areas of highest risk. Where development is necessary, mitigation measures should be put in place to ensure</i></p>	Objection is noted. The Objectively Assessed Housing Needs Study will be updated using the Government's new standardised methodology for calculating housing need. The latest population and household projections will also be used.

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				<p><i>that flood risk is not increased elsewhere. Sites which suffer from fluvial or surface water flooding will only be considered suitable where it can be shown that development would not increase flood risk.'</i></p> <p>OAHN:</p> <p><i>'the latest 2014 mid-year population estimate (MYE) for Wyre Forest suggests a population of 98,960, a 2.1% increase since 2001. This rate of growth is lower than the West Midlands regional average of 8.2% and the average England growth rate of 9.8%'</i></p> <p>1. <u>Brief Summary</u></p> <p>The Draft Local Plan is based on the OAHN. This document is totally flawed in that it fails in its legal duty to use the latest statistical data in its calculations. Specifically the Vacancy rate used is out of date. It assumes that a further 1.3% of houses will become vacant after the plan is completed. This will be a disaster for Kidderminster as it will cause a collapse in house values. Whilst this will not help people who simply cannot afford to buy houses it will damage current house owners and the developers who are to build the houses. The draft local plan states that the population of Wyre Forest is static and it then allows the OAHN to use a population growth of 8%. This is evidently incorrect. It is very difficult to understand why Wyre Forest District Council has accepted this number when it is obviously</p>	

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				<p>wrong and will lead to unnecessary development on Green Belt Land.</p> <p>a) The primary duty of Wyre Forest District Council is to care for its residents. Building housing which is not required and destroying Green Belt is the opposite of what the council should be doing. The plan virtually ignores the housing requirements of the most needy assuming that people can leap from homeless to affordable housing. It shows no care for those who can-not afford affordable housing.</p> <p>b) The Consultation process is flawed and unsafe.</p> <p>c) There are very profitable possibilities to build homes and considerably improve Kidderminster which haven't been considered.</p> <p>d) Wyre Forest District Council are being deliberately evasive about the route and the nature of the relief road, not wishing to 'come clean' until Plan A has been approved.</p> <p>e) Wyre Forest District Council have disregarded the damage to the well being and health of considerable numbers of people who rely on these fields, and are prepared to destroy the habitat of a large number of species including threatened species</p> <p>3. <u>Analysis of Housing Requirements Projections</u></p> <p>I. <u>HELAA report</u></p>	

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				<p>I have added up availability presented in the Helaa report.</p> <table border="0" style="width: 100%;"> <thead> <tr> <th style="text-align: left;">Section</th> <th style="text-align: right;">No of Dwellings</th> </tr> </thead> <tbody> <tr> <td>A. Sites Under construction</td> <td style="text-align: right;">582</td> </tr> <tr> <td>B. Non implemented Planning Permissions</td> <td style="text-align: right;">393</td> </tr> <tr> <td>C. Deliverable sites next 5 years</td> <td style="text-align: right;">1405</td> </tr> <tr> <td>D. Urban Brownfield Sites beyond 5 years</td> <td style="text-align: right;">490</td> </tr> <tr> <td>E. Urban Greenfield Sites beyond 5 years</td> <td style="text-align: right;">116</td> </tr> <tr> <td>F. Rural Brownfield Sites</td> <td style="text-align: right;">29</td> </tr> <tr> <td>G. Rural Green Field Sites</td> <td style="text-align: right;">681</td> </tr> <tr> <td>H. Green Belt Brownfield Sites</td> <td style="text-align: right;">779</td> </tr> <tr> <td>I. Green Belt Green Field Sites</td> <td style="text-align: right;">8377</td> </tr> </tbody> </table> <p>1. If the actual need were less than 3697, no Green Belt land would be required.</p> <p>2. If the actual need were less than 4476, only brownfield Green Belt land would be required.</p> <p>3. 8377 Green field Green Belt sites have been identified. This number obviously shows the absolute need to protect the Green Belt immediately and permanently.</p>	Section	No of Dwellings	A. Sites Under construction	582	B. Non implemented Planning Permissions	393	C. Deliverable sites next 5 years	1405	D. Urban Brownfield Sites beyond 5 years	490	E. Urban Greenfield Sites beyond 5 years	116	F. Rural Brownfield Sites	29	G. Rural Green Field Sites	681	H. Green Belt Brownfield Sites	779	I. Green Belt Green Field Sites	8377	
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				<p>II. <u>Rounding – Justification?</u></p> <p>If the OAHN report is accepted, then the requirement is calculated at 284 dwellings per year. The report then rounds up this number to 300 dwellings per year. This simple unjustified action requires the building of 240 houses over the 15-year period</p> <p>A section of Green Belt land will be used for building 240 houses purely because of a rounding up. Who does the rounding up benefit? It allows developers to build more executive houses and therefore increase their profits. Is the Council not here to serve the residents?</p> <p>III. <u>Vacancy rate</u></p> <p>The OAHN report says that the number of vacant properties in Wyre Forest is 3.2%</p> <p>It says that there are currently 44490 dwellings in Wyre Forest</p> <p>It then increases the allowance for vacant properties to 4.5 %. Whilst the 4.5% figure is taken from the 2011 census, Wyre Forest District Council is legally obliged to use the most up to date data available, i.e., the current Council Tax data. There is no logical reason to use the 4.5% figure instead of 3.2%</p>	

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				<p>The difference between 3.2% and 4.5% is 1.3%</p> <p>There are 44490 dwellings in Wyre Forest</p> <p>This means that extra 44490 x 1.3% dwellings will be built or 578 dwellings (39 per year).</p> <p>In other words, because the OAHN consultants have chosen, without statistical justification, to increase the vacancy rate by 1.3%, 578 houses will be built on the Green Belt in order to allow for them to remain vacant.(I have based the vacancy rate on 44490 making it an underestimate)</p> <p>IV. <u>The main OAHN calculation of housing requirement.</u></p> <p>It is impossible for a mere mortal to analyse the OAHN report and discover how the housing requirements were calculated making it impossible to analyse and challenge.</p> <p>I have tried to replicate the calculations using data provided by the OAHN report.</p> <p>I have looked at 2 population growth figures, 8.2 % which is a national average that obviously doesn't apply to Wyre Forest, and 2.1% which is the actual growth</p>	

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				<p>figure of population in Wyre Forest since 2001.</p> <p>Whilst I have used this figure it is my understanding that the population growth was all weighted to before 2011 and there has been nil growth since 2011. The figures also make no attempt to factor in potential population decline as the considerable number of European citizens in Wyre Forest falls post Brexit.</p> <p>I will try to explain my calculations as I do them: Latest population figure for Wyre Forest: 98960</p> <p>Number of occupied dwellings: 43086</p> <p>Average number of occupants per dwelling (98960/43086): 2.2968</p> <p>(note: I have not made any attempt for allowing this average to decrease)</p> <table style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: right;">Population Growth</td> <td></td> </tr> <tr> <td style="text-align: right;">2.1%</td> <td></td> </tr> <tr> <td style="text-align: right;">Population Growth from 98960</td> <td></td> </tr> <tr> <td style="text-align: right;">2078</td> <td></td> </tr> <tr> <td style="text-align: right;">Dwellings required</td> <td></td> </tr> <tr> <td style="text-align: right;">(growth divided by 2.2968)</td> <td style="text-align: right;">904</td> </tr> </table>	Population Growth		2.1%		Population Growth from 98960		2078		Dwellings required		(growth divided by 2.2968)	904	
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				<p>Dwellings per year</p> <p>(over 15 yrs) 60</p> <p>As a check as to whether my calculations work, if I add together the increased number of houses to be left vacant and the houses required for increased population at 8.2% it comes to $235 + 39 = 274$ per year. This is so close to 284 that I feel that my simplistic calculation is somewhat less flawed than the number by which the consultants have rounded their calculation up.</p> <p><u>V. Conclusion</u></p> <p>The figures used to calculate the housing requirement have been deliberately maximised to produce the highest possible number of houses required.</p> <p>There is absolutely no need to round the figures upwards.</p> <p>The use of 4.5% vacancy is out of date and should not have been used.</p> <p>The population growth figure taken by the OAHN has no basis in the reality of Wyre Forest. 2.1% is a far more realistic figure.</p>	<p>235</p>

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				This means that the housing requirement over the 15 year period of the local plan is far closer to 904 than 6000. The plan is totally flawed and must be totally withdrawn. There is absolutely no requirement to build on the Green Belt in Wyre Forest.	
	LPPO2805	Housing Numbers	Object	The statistics used are unfounded. 284 homes per annum are needed but this has been rounded up to 300 by Wyre Forest District Council is slap dash. That not all these houses would be affordable homes is unbelievable. To use statistics based on other parts of the country is deliberately misleading. The population of Wyre Forest & Kidderminster is static or likely to fall in the light of Brexit.	Objection is noted. The Objectively Assessed Housing Needs Study will be updated using the Government's new standardised methodology for calculating housing need. The latest population and household projections will also be used.
	LPPO4591	Green Belt Review	Object	In the Green Belt review, some of the assessment is wrong and coalescence will occur if Option A were to be pursued.	Objection is noted.
	LPPO3269	Evidence base	Object	Conflicting statistics available that state the number of new dwellings required and associated infrastructure is considerably less than is proposed in the Local Plan review. Figures from the ONS suggest that the additional population requirement is more like 100-200 homes per year. The 6,000-home target is completely unnecessary.	The 6,000 figure was calculated from the Objectively Assessed Housing Needs (OAHN) Study which concluded that 300 new dwellings per annum would be required over the plan period. In addition to this there is a requirement for C2 use (i.e. care homes for the elderly). However, since the Preferred Options document was published, the Government has introduced a

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					standardised methodology for calculating housing need. The OAHN study is therefore being updated to use the new standardised methodology and will also use the most up-to-date population and household projection data available. This revised housing need requirement will be used to inform the emerging Pre-Submission Plan.
	LPPO3719	1.22	Object	The evidence presented within the OAHN is flawed as it is not objective but subjective in core areas. The text states that the information has simply been taken into account and does not say how this has been checked, challenged or audited in anyway and exposes the Council to development that is overly stated and unsustainable. Again, the plans are unsustainable and based upon subjective rather than objective evidence.	Objection is noted. The Objectively Assessed Housing Needs Study will be updated using the Government's new standardised methodology for calculating housing need. The latest population and household projections will also be used.
	LPPO3938	1.22 OAHN	Object	The OAHN is fundamentally flawed and ambiguous. It concludes: In conclusion a review of Market Signal data suggests that the housing market across Wyre Forest is relatively stable and that currently there are no indicators prompting a need for adjusting the housing dwelling requirement. However, the Council should monitor comparable data on a regular basis to ensure it has up to date information from which to review dwelling targets.' The Housing and Economic Development Needs Assessments (GOV.UK) states 'There is no one	Objection is noted. The Objectively Assessed Housing Needs Study will be updated using the Government's new standardised methodology for calculating housing need. The latest population and household projections will also be used.

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				<p>methodological approach or use of a particular dataset (s) that will provide a definitive assessment of development need. The use of this standard methodology set out in this guidance is strongly recommended because it will ensure that the assessment findings are transparently prepared. The assessment should be thorough but proportionate.</p> <p>In my view, further investigation into the process by which Wyre Forest District Council have arrived at their assessment of housing needs, should take place, in order to comply with the above.</p> <p>The OAHN Report states that the census is a relevant source, which would be the most accurate measurement of growth within Wyre Forest over the past 15 years. This data is then discarded and in replacement it uses arbitrary national and regional figures to arrive at the final growth rate. WFDC are able to utilise census data to inform a growth rate of 3000, which could be accommodated within brownfield sites.</p> <p>8.6 quote ‘We propose that the OAHN should be 300 dwellings per year. The figure sits at the upper end of the dwelling requirements’</p> <p>If the lower end figure of required dwellings were accepted, it could result in up to 100 fewer dwellings required per annum, and could possibly meet anticipated housing need, whilst reducing the</p>	

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				<p>requirement for release of Green Belt land. It would also comply with the Council's duty to regularly monitor housing need, as concluded in OAHN Report.</p> <p>The OAHN Report recommends that dwelling requirements per annum are in the region of 199 – 326. WFDC are using the worst case scenario. A further in-depth examination of the figures suggests that the need for land could be reduced.</p> <p>I am concerned that, given the static, ageing population, current available housing stock of 1400 plus dwellings, why a more conservative figure cannot be considered by Wyre Forest District Council. It would appear that, further challenge of the data is required.</p> <p>The Office for National Statistics Sub National Population Projections (SNPP) evidences a growth in population for the period of 4.75 and a requirement of 199 dwellings per annum. This would bring about a reduction of 1818 dwellings over the period bringing the total down from 5400 to 3582. The plan figure of 300 dwelling per year seems to be based on a population growth of 7.7%, which is considerably higher than the last 14 years.</p> <p>8.12 quote 'No cross boundary demands from neighbouring authorities have been identified in current plans. However, discussions are on going regarding a shortfall of provision in Greater Birmingham HMA'</p>	

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				<p>Is there financial gain for WFDC from Government or other sources to release and trade Green Belt land in order to supply an unknown quantity of dwellings to satisfy an unknown greater than 'local' need?</p> <p>It would seem that the Council have been misinformed by the independent Amion Report and a further review of housing need, at a clearly reduced level of need is imperative, to minimise loss of Green Belt, and provide a robust analysis of housing need.</p> <p>It would appear also that central government require that 'Planning Authorities are required to demonstrate a 5 year land supply for the delivery of housing'. Why therefore is there a need for a 15 year defined supply? Compare Bromsgrove Local Plan timescales.</p> <p>Is therefore the OAHN a report designed to provide an estimated forecast of Wyre Forest District local needs and inform the Wyre Forest Draft Local Plan or has the interpretation of the term 'Local' come to have an entirely different meaning?</p> <p>In conclusion, the OAHN Report is not fit for purpose, is flawed and not objective. It requires further scrutiny and revisiting.</p>	
	LPPO3941	1.22 HELAA	Object	The Wyre Forest Strategic Housing and Economic Land Availability Assessment, 2016 identifies all sites regardless of the amount of development need to provide an audit of available plan.	The HELAA is a technical study which demonstrates the locations and potential capacity of available development sites. In terms of Green Belt sites listed, these reflect (in the

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				<p>Table J Green Belt Greenfield sites deliverable beyond 5 years and further tables report non deliverable sites beyond 5 years.</p> <p>No reference is made to this data in the Draft Local Plan, or during discussions at ‘drop ins’. There has been insufficient information to provide residents with an audit trail of supporting documents, in order to inform their consideration of preferred options.</p> <p>If the availability of sites is totalled, as referenced in the HELAA, several scenarios can be considered. If the actual need were less than 3697, no Green Belt land would be required.</p> <p>If the OAHN is accurate, then the requirement is calculated at 284 dwelling per annum. The report then rounds up this number to 300 dwellings per year.</p> <p><i>This simple unjustified action requires the building of 240 dwelling over a period of 15 years. It would appear that a section of Green Belt could be used for housing purely as a result of ‘rounding’ exercise.</i></p> <p>The OAHN Report suggests an annual dwelling requirement of between 199 and 291 (Table 3.2) with further flexing there is partial return to 2008 Headship rates giving 239-332 (Table 3.4) 199 is derived from the Office for National Statistics Sub National Populations</p>	<p>main) those pieces of land that have been put forward by landowners. The sites listed in Table J are Greenfield sites in the Green Belt which could only be released for development if taken out of the Green Belt via the Local Plan process. The totals given for each category of HELAA site are estimates (other than those sites with permission in place) and there is no guarantee that all these sites could come forward for residential uses. In fact, the status of a number of sites listed has changed and an updated HELAA document will be available alongside the draft submission. This will also include additional sites submitted at Preferred Options consultation.</p> <p>The HELAA is just one of a number of pieces of technical work used to select sites to go into the final submission document. A site selection paper will be submitted alongside the final document which will explain how the many different factors were weighed up in order to come up with a final list of sites.</p> <p>The OAHN is being refreshed using the</p>

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				<p>Projections (SNPP) 2014.</p> <p>Our population is acknowledged as ‘static’. In the Draft Local Plan Section 6A, 300 dwellings is assumed, but if we take PG Short Term data which indicates a population increase of 5.8%, this equates to more than double the rate in recent times and requires only 229 dwellings per year, 1278 less than figures suggest. There would therefore be no need to sacrifice the Green Belt to the rear of Spennells.</p> <p>Section 4.16 indicates that due to ageing population, economic activity and employment are projected to decline.</p> <p>Cambridge Econometrics suggest an increase in jobs of 76 per year. Oxford Economics suggest increase in jobs of 2 per year. Experian suggest -61 per year.</p> <p><i>The above, seemingly inconsistent findings would suggest they do nothing to inform the process and should be discounted.</i></p> <p>It would appear that, even if we assume population growth figures equating to more than double, when compared with trends from 2001-2015, we do not need to consider the use of the Green Belt land, with particular reference to the fields at the rear of Spennells. By assuming this growth level and in reducing the vacant dwelling % to current levels, there would be a need for</p>	<p>Standardised Methodology and the latest population data.</p>

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				<p>3243 dwellings over the period, which would equate to 180 per year.</p> <p>It is my view that, after careful consideration of information sources available, that WFDC should undertake a comprehensive review of the Draft Local Plan. There are inconsistencies within the OAHN, which if accepted without challenge, could result in discriminatory sacrifice of our of Green Belt areas of the district.</p> <p>Whilst I strongly object to Option A, I believe no presently offered options should be considered or pursued, until further scrutiny and review of housing development need is conducted.</p>	
	LPPO4144	1.22 Issues and Options Responses	Object	<p>Regarding the LPR Issues and Consultation Paper – Responses September 2015 which informed the Draft Local Plan, little was made of this important consultation paper in the Draft Local Plan. Indeed the only reference to it was Under Section 6 – Summary of Issues and Options Responses there is just one point. This does not represent the weight of objections to Option 3 (now Option A): ‘Local opposition from local residents (particularly the Spennells Housing Estate) in respect of an Eastern Kidderminster extension (Option 3) although some support for this approach was expressed from other quarters’.</p> <p>In the opening comments 7 out of 18 were from building</p>	<p>Objection and comments are noted. The consultation responses from the Issues and Options consultation undertaken in 2015 have been used by the Local Authority to inform the emerging Local Plan. The results of the Issues and Options consultation responses were made available on the Council's website during the Preferred Options consultation. However, your comments are noted and it is helpful to have feedback on our consultations so we can make improvements for future consultation events.</p>

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				<p>contractors (39%). Only 4 were made by members of public (22%) and comments about difficulty in ordinary people accessing the consultation were made– WFDC comment about leaflet drops. All other questions at least 20% comments are from builders.</p> <p>For Option 1 – all in support of brownfield regeneration</p> <p>For Option 3. Brownfield regeneration focussed on the main towns and expansion of Kidderminster to the south-east via a sustainable urban extension. There were 21 responses, 15 objected and 2 commented negatively – 81%.</p> <p>Question 14 is leading and an example of a leaning towards the WFDC own preferences: Do you think a Sustainable Urban Extension to the south east of Kidderminster is the most sustainable location for greenfield development? If so, do you have any views or suggestions on appropriate development sites in this area?</p> <p>Regarding the actual Draft Local Plan, the “on-line survey of key stakeholders” and interviews with estate and lettings agents, the space in the document allocated to this gives the impression that it was a substantive piece of work, whereas it was not. The survey population is not numerically defined, so a response rate cannot be determined and so the value of the exercise and the representativeness of the answers is limited.</p>	<p>In terms of the various options considered at the Issues and Options stage, the Sustainability Appraisal Report and the Site Selection Paper consider these options in detail and explain why some options were taken forward and others were not in the plan making process.</p>

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				Given “25 individuals replied” and confusingly “16 responded to the survey questions” - and anything less than 30 is a ‘small number’ statistically - it is hard to justify the author’s view that it represents “an invaluable view on the current housing market and related issues in Wyre Forest”. This is compounded by 4 interviews conducted with local estate and letting agents. Whilst qualitative information is of value in support of a quantitative survey, the quality of the work on both fronts is so flawed as to render the findings meaningless.	
	LPPO4872	1.22 Green Belt Review	Object	I challenge the validity of the Green Belt Review and the consequences this has, in respect of Option A for the fields between Spennells and Summerfield. These fields have a massive impact upon social amenity, biodiversity and the integrity and identity of the hamlets of Summerfield and Stone	Objection noted.
	LPPO495	1.24	Object	I don't believe that this plan will work. Not sure where the economic growth will come from? Some of the units on Worcester Road that were built a few years ago are still empty. We are in a downturn. The only people that will benefit the development of Green Belt are the developers not people on the housing waiting list.	Objection is noted.
	LPPO3720	1.24	Object	The previous plans from the Council have not achieved sustainable economic growth and this one is no different. It contains unrealistic thinking, takes no account of Brexit with the risk of slowdown in investment together with other wider impacts and risks. There has been no sensitivity analysis conducted to	Objection is noted. A number of evidence base studies have informed the emerging Local Plan, these include the Objectively Assessed Housing Need Study, and the Employment Land Review.

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				determine how sensitive each economic factor is to wider impacts to gather a risk appraisal of setting up a grossed up scale of development that will turn out to be damaging to the towns.	
Land Research & Planning Associates Ltd	LPPO537	1.24	Object	<p>Not in terms of proper consideration of adequate or sufficient land for affordable homes. The only way to address this is to release more land around the rural settlements to ensure economic growth is sustained in those areas.</p> <p>Our clients have land at Far Forest that would accommodate this.</p>	Objection is noted.
	LPPO396	1.24	Comment	<p>The plan fails to recognise changes in shopping habits - in particular the failure to 'tidy up' following the migration of Kidderminster town centre to Weavers Wharf and Crossley Retail Park.</p> <p>Many retail premises left behind have been empty for 8 /9 years - half the life of the proposed new plan!</p> <p>There is a need for fresh thinking that enables Kidderminster to become a modern, contained and attractive town centre that incorporates retail leisure and residential opportunities rather than pursue outdated models from the past - 'mixed use' communicates little other than the elements of 'wishful thinking' so often reported in the local press.</p>	Comments noted.
Land Research &	LPPO534	1.25	Comment	Noted. The present Local Plan is becoming increasingly	Comment is noted.

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Planning Associates Ltd				out of date in terms of housing requirement (5 HLS) because it does not encourage or provide sufficient land to accommodate affordable homes.	
	LPPO157	Whole document	Object	I did not receive official notification of this development planning process, I am not the only one, and the consultation process as it stands is fatally flawed. I received a notification from another local resident who said there was a development planning consultation in process. I suggest that the whole of the notification process be reviewed and the consultation should be re-run when correct open and transparent notifications have taken place.	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. The drop-in sessions were all very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event was approved by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet.</p>

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					We will however take your comments on board and will consider these issues next time we undertake a consultation event.
	LPPO2310	Preferred Options	Object	<p>My objection is in letter form as your response form is not fit for purpose!</p> <p>A flawed plan with so many inaccuracies and heavily weighted in one direction (totally unfair).</p>	Objection is noted.
	LPPO566	Various	Comment	<p>I accept additional dwellings have to be built however:-</p> <ol style="list-style-type: none"> 1. I understand there is sufficient land already 'available' to satisfy the building needs for the next 10 years, I suggest this stock be exhausted before any additional land be released from the Green Belt. Green Belt land will be easier, cheaper, more profitable for developers thus will be developed before the existing stock of available land. 2. Any affordable dwellings should be reserved for people with connections to the district, i.e. currently live in the district, have close family ties, work in the district etc. 3. A plan that just concentrates on the dwellings is unacceptable. I realise the district council does not have responsibility for roads, schools etc. but plan does not include COMMITMENTS to how the impact on these services is to be met 4. Possibility of an eastern relief road has been mentioned, do not use this as a carrot to 	<p>Comments are noted. Infrastructure providers have been consulted in the Local Plan process. Details of the infrastructure requirements for the Local Plan can be found in the Infrastructure Delivery Plan (IDP).</p> <p>Worcestershire County Council, the highways authority, has also been consulted and they are preparing a Transport Modelling evidence base study. This will inform the site selection process and will help to evidence what highways improvements will be required, and whether an eastern relief road is necessary.</p>

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				<p>persuade people to accept the plans only to conveniently forget it in the future, as has happened in the past. I understand the county council has done virtually no work on this proposal therefore it should not be included unless it is a strong PROBABILITY of it happening.</p> <p>5. With regards to the areas of Green Belt to be released, especially the rear of Baldwin Road and to the eastern fringes of Comberton, Offmore and possibly round to the A449, this will be a relatively narrow development with no heart to the development and will therefore place an unrealistic load existing overstretched primary schools, doctors surgeries etc. I can understand the benefits of building to the eastern side of Kidderminster to attract commuters from Birmingham and Wolverhampton. A more centralised development would justify a new primary school, doctors, and have less impact on the surrounding people. The obvious place is Lea Castle.</p> <p>6. Any plan must specify how people are to travel from the new dwellings to the various places they need to visit and their place of work. Not just how they get in and out of the development.</p>	

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	LPPO178	Foreword	Comment	<p>Before any future new developments are ever considered, important factors must be resolved now.</p> <p>Hospital care will only increase with an increased population, plus other health provision i.e. doctors surgeries etc. How will hospitals cope?</p> <p>Education provision should be firmly planned for now, not left for a future thought.</p> <p>All on going sites that have been left and not developed should be finished before any green fields are even touched e.g. Sion Hill School, Yew Tree Pub, Broadwaters and Lee Castle Hospital. Sion Hill feeling that the developer hopes he can use Green Belt behind the school.</p> <p>The centre of Kidderminster is a disgrace, now is time have a complete rethink. Many empty retail premises will never ever change back. The area should be developed for both residential and commercial use bringing life back into a dying town, making it a young vibrant area.</p> <p>All roads and transport infrastructure must clearly defined and planned for before any future development go ahead.</p>	<p>Comments are noted.</p> <p>Worcestershire ACUTE NHS trust has been consulted as part of this planning consultation. Any future infrastructure needs for the hospitals will be identified by them as the provider. Policy 12 enables future infrastructure needs to be met.</p> <p>Worcestershire County Council as a statutory consultant has provided evidence on all school place requirements.</p> <p>A number of the sites referred to have been proposed as site allocations, i.e. Sion Hill, Lea Castle former hospital site.</p> <p>In terms of roads and transport infrastructure, we have consulted with the infrastructure providers as part of the Local Plan process to identify their infrastructure requirements. This is evidenced in the Transport modelling work and also the Infrastructure Delivery Plan (IDP).</p>
Shrawley Parish	LPPO1418	Foreword	Comment	WFDC consulted Malvern Hills District Council (MHDC) It	Comment is noted.

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Council				is extremely disappointed that MHDC has not cascaded this down to those villages, such as Shrawley, which have a specific interest in some of the proposals. This remains a concern.	
	LPPO331	AKR/15 and AKR/14	Object	<p>Saddened to see the above fields suggested for development. The views are superb & used by walkers to relax from the hustle & bustle and enjoy the fauna/flora. Dunley Road is already becoming increasingly congested, on Friday mornings especially with the car boot, traffic comes to a standstill as it enters Bridge Street. I fear another high air dioxin area being created. I have witnessed the floods on the fields of Pearl Lane, a known flooding black spot, which is bound to be increased with more housing and hard surfacing. The view from Areley Kings church conservation area will also be worsened if housing sprawl is allowed to encroach along the Ribbesford Road into grade 3 agricultural land.</p> <p>Please make more use of un-kept and run down premises in Kidderminster and Stourport town centres. In Areley Kings the Squirrel Inn, Areley Common, is abandoned as is the former sports centre. Areas around the Tesco Store in Stourport town centre are still unused. The former Parson Chain premises and the "shopping mall" in Bridge Street are not being used. In Kidderminster, there are endless opportunities all along Worcester Street & with the former sugar beet premises and lea castle sites the area is blessed with so many</p>	<p>Objection is noted. The emerging Local Plan has considered the brownfield sites available for development in the District. Evidence of this can be found in the HELAA document and also the Brownfield Land Register. Unfortunately, we do not have enough available and deliverable brownfield land to accommodate all of our development needs.</p> <p>A number of these sites mentioned are already being considered as possible allocation sites, i.e. Parsons chain site, Bridge Street Basins, Lea Castle, and the remaining sites in the former sugar beet premises.</p>

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				brown field sites. Please retain the fields for future generations to enjoy.	
	LPPO267	Detailed response	Object	Why build on the Green Belt. There is plenty of 'Brown' land to use i.e. the old power station site in Stourport and the ex British Sugar corp. site in Kidderminster. Indeed there many sites in KR which have derelict and unused buildings which could be used.	Objection is noted. The emerging Local Plan has considered the brownfield sites available for development in the District. Evidence of this can be found in the HELAA document and also the Brownfield Land Register. Unfortunately, we do not have enough available and deliverable brownfield land to accommodate all of our development needs.
	LPPO460	Potential site for travelling showpeople Habberley Rd	Object	<p>I object to the potential use of the site at Habberley Rd, Bewdley on following grounds:</p> <p>I don't consider that the site satisfies the criteria of the council's policy as the requirement is not an exceptional circumstance, it is not suitable for storage and would harm the appearance of the area. An earlier attempt to include an adjacent site was dismissed at an early stage a few years ago on the grounds of Highways concerns re large vehicles accessing the site in an accident black spot close to the Mercure Hotel.</p> <p>The site is currently in a good state and in current use and being close to the afore mentioned hotel and Pines Golf Club could impact on tourism.</p>	Objection and comments noted.

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				<p>There are potential environmental issues - planning permission on adjacent sites have been refused on grounds of proximity of potential bronze age burial mound and encroachment on area separating Kidderminster/Bewdley.</p> <p>Use could not be restricted to one user.</p> <p>Other proposed sites are more suitable.</p>	
	LPPO517	Appendix A	Object	<p>Objection to Use of Green Belt land for housing developments to the of rear Baldwin Road & Spennells Fields, REFERENCE NUMBERS: OC/4, OC/5, OC/6, OC/13, Hurcott BW/4, WFR/ST/2 & AS/10</p> <p>PRECIS</p> <p>Object to the use of Green Belt land for housing development to the rear of Baldwin Road and Spennells fields etc. This would irrevocably destroy the appeal and beauty of the area and bring with it added health, pollution and social problems.</p> <p>Alternative brown field sites are available along with pockets of derelict land ripe for redevelopment.</p> <p>The amount of development required has been vastly overestimated, the actual amount needed could be sustained on alternative brown sites (Lea Castle, disused pubs, disused factories such as those in Park Lane,</p>	<p>Objection and comments are noted. The Objectively Assessed Housing Needs Study will be updated using the Government’s new standardised methodology for calculating housing need. The latest population and household projections will also be used.</p> <p>The Preferred Options consulted on a number of site options. The Pre-Submission Local Plan will identify the Council’s final proposed list of site allocations. These will then be considered by the Planning Inspector during the examination of the Local Plan.</p>

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				<p>Sladen/Sion Hill schools).</p> <p>POPULATION</p> <p>For Kidderminster & Stourport the Local Plan seeks to bring in population from outside areas. Such a population would no doubt work outside the area adding to traffic pollution. New affordable houses should be earmarked for local people trying to get on the property ladder.</p> <p>Restrictions should apply so the intended “local people” actually become the purchasers as opposed to those not intended for when built. Instead we predict the bulk of development will be 4/5 bedroom houses with tiny gardens, ignoring what local people want. These developments provide little green space for community wellbeing and habitats for nature. Conversely, Bewdley, Chaddesley & other villages are required to provide "housing to meet local needs." Why the difference?</p> <p>We question the need for 300 houses p.a. which is based on a growth rate of 7.7% & not the actual 2.7% (2001-15) which is way below the national average used to arrive at the large figure required. The true figures based on Kidderminster's census figures could easily be accommodated in brown sites like Lea Castle.</p> <p>These growth rates figures are based on assumptions prior to the Brexit vote which will impact reducing the</p>	

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				<p>migration of European people to this county that would have had a housing requirement. The predicted growth rates are fundamentally flawed in many ways meaning the migration to this area will be greatly reduced therefore the growth rates cannot be used to predict the requirements for housing growth required in the WFDC area.</p> <p>POLLUTION</p> <p>Development of these areas would substantially increase the already heavy traffic pollution. We have seen a steady increase in an unacceptable level of traffic (including a lot of very large commercial vehicles) on these residential roads to avoid the lights at Birmingham Road. We have monitored the traffic and the amount of use is large and mainly by non residents travelling to the West Midlands! Also the speed of this traffic is seriously dangerous, especially to children, the vulnerable and animals. This development would further impact on air quality and is contrary to National Planning Policy Framework especially para. 109-124. Add to this an increase in the already incessant traffic noise levels.</p> <p>The proposed development to the rear of Baldwin Road infers that Hurcott Lane will require the road to be blocked for vehicle access at either the Birmingham Road or Stourbridge Road ends but this will not prevent traffic flow just divert more traffic into Hurcott Road increasing pollution and volumes of traffic on roads only</p>	

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				<p>designed for local residential traffic which have inadequate flow characteristics.</p> <p>This is not a healthy and community spirited decision to develop the area and increase traffic on our already overused residential roads which are being used akin to A roads. Baldwin Road is similarly treated like a rat run and as for the Horsefair how much more can this bottle neck sustain? We are trying to improve the look of this run down area not destroy it and end all hope of engendering a happy community spirit. Extra housing would require a by-pass to be built as the aforementioned roads just cannot sustain more traffic and the pollution it brings.</p> <p>WILDLIFE</p> <p>The area is known and loved for its beauty and wildlife. It is treasured by local folk and visitors. Green Belt plays an aesthetic role in separating the town from the West Midlands conurbation and these green fields are the first introduction to Kidderminster on the A451 and A456. Do not bulldoze this asset as safeguarding the district's Green Belt preserves its attractiveness to both locals and visitors. Consider the importance of recreational activities in terms of health, wellbeing and tourism. People need space to thrive but its unlikely developers would provide sufficient open spaces or parks as there's no money in it! Compared with neighbouring towns like Stourbridge we are lucky to</p>	

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				<p>have such big green spaces. Don't destroy it for future generations when alternative brown or derelict sites are available.</p> <p>Endangered species and wildlife in general would be threatened. In our garden we have seen bats, newts, badgers, a heron and dragonflies. Development would seriously impact and cause irrecoverable change to wildlife habitats especially on buffer zones for Hurcott and Podmore SSIs.</p> <p>Some proposed development sites have steep gradients which could raise the risk of potential flooding. The proposed development behind Baldwin Road has the potential to flood, on one side with run off towards the Birmingham Road with a natural hollow in the main road and on the other side run off towards the lower end of Hurcott Road where it is a narrow lane which in turn would run off into the outfall from Hurcott Pool and transfer to Broadwaters with the potential for flooding the adjacent main road.</p> <p>Land to the rear of Offmore and Baldwin Road is generally much higher than the rest of the area so any development would be very visible and not blend in spoiling the beauty of the area. The field height to the rear of Baldwin Road means that the proposed properties would adversely overlook the existing properties & their gardens at the lower end of Baldwin</p>	

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				<p>Road.</p> <p>The Government's own policy regarding planning decisions is to prevent harm to biodiversity and geological interests. In brief all planning decisions must consider location on alternative sites to green fields.</p> <p>AMENITIES and COMMUNITY SPIRIT</p> <p>We suffer from a lack of amenities in this area. One shop in which our post office was taken off us. A smattering of shops in Spennells and Offmore. Can local schools accommodate extra housing on this level? Offmore is already full and can't be developed. We no longer have an acute hospital so all this extra population would place more pressure on Worcester Royal already facing special measures. This also raises questions with regards the existing level of doctors, dentists and opticians in the area. Public transport is poor and infrequent.</p> <p>Big developments generally have no community spirit. Building on smaller pockets of land fosters integration. Large sprawling estates increase social isolation, antisocial behaviour and crime rates as acknowledged by the WFIDP. Doubling the size of Spennells would not be a wise move.</p> <p>CONCLUSION</p> <p>We need smaller numbers of houses proposed which</p>	

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				<p>can be sustained by brown sites like Lea Castle. Smaller pockets of once used land should be considered like factories on Park Lane, closed pubs (The Broadwaters?) closed schools like Sladen and Sion Hill.</p> <p>We need to reinvigorate existing eyesores such as disused schools & factories which are frequently vandalised and this will improve some of the more rundown areas rather than permanently erode Green Belt sites, which once gone they are gone forever.</p> <p>Don't bulldoze Green Field sites prior to using up every brown field or derelict site in the locality.</p>	
	LPPO634	Foreword	Object	You state that the Council believes that it is very important that everyone responds to this consultation	Objection is noted.
CORE11	LPPO135	Foreword	Support	Support for Foreword.	Support is noted.

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	LPPO345	2.1	Comment	If we extend planned developments to our Green Belt areas, you are going against what you have said in this paragraph and not continuing to make the most of brownfield regeneration; an example of this is Westhead, which I can find no mention of any plans for.	Previous policy has concentrated development on brownfield land, however, much of the brownfield land has now been developed. The policy of the Council is for the development of brownfield sites however, the amount of housing required within Wyre Forest District is much greater than the availability of brownfield land. Therefore greenfield sites and Green Belt land needs to be considered.
	LPPO397	2.1	Comment	Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collectively review overall brownfield site availability and plan housing development accordingly. Artificial borders should not apply when making decisions to destroy the Green Belt.	The authorities are all separate authorities who are at different stages in the local plan process. Wyre Forest District has its own housing market which is separate from the other authorities housing market areas. In Wyre Forest District there has been an assessment of brownfield sites and there is a brownfield land register.
	LPPO420	2.1	Comment	Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collectively review overall brown field site availability and plan housing development accordingly. Artificial borders should not apply when making decisions to destroy the Green Belt.	The authorities are all separate authorities who are at different stages in the local plan process. Wyre Forest District has its own housing market which is separate from the other authorities housing market areas. In Wyre Forest District there has been an assessment of brownfield sites and there is a brownfield land register.
	LPPO346	2.2	Comment	The relatively static population would suggest	The Local Authority has evolved their strategy

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				<p>that plans for large scale developments are not merited under those statistics.</p> <p>We recognise however that small scale developments are needed.</p>	<p>for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p> <p>[1] ONS 2016-based Subnational Population Projections</p>
	LPPO472	2.2	Comment	<p>The population of Wyre Forest has risen by around 1,200 since 2001, representing an increase of around 1.2% and by about 100 persons since mid-2011. http://www.worcestershire.gov.uk/info/20044/research_and_feedback/795/population_statistics/8</p> <p>Accordingly I do not see the need to increase the dwellings by 300 p.a.</p>	<p>The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p>

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					[1] ONS 2016-based Subnational Population Projections
Kidderminster Civic Society	LPP01165	2.2	Comment	We note that the population of Wyre Forest has been almost static for some time. In making our comments we rely on the accuracy of your figures for the number of houses required by the government to be built in Wyre Forest up to 2034 and your forecast for the district.	<p>The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p> <p>[1] ONS 2016-based Subnational Population Projections</p>
	LPP04047	2.2	Comment	<i>Page 12, Para 4.2 “However, after a decade with a population increase of only 1. 1% (2001-201 1), the population increased by a further 1. 1% from 2013 to 2015” — It is assumed the 2001-1 1 figure is derived from the census report — where is the evidence for the 2013 to 2015 figure?</i>	Population between the census years are based on Office for National Statistics (ONS) Population estimates.
	LPP0159	Population	Object	With Wyre Forest losing more jobs than it is gaining, there is no need to build on Greenfield sites. Central areas of Kidderminster can be	There is a requirement for additional dwellings within the district as identified in the Objectively

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				built on to accommodate any increase in population. More housing could be built at Blakedown to ease pressure on the main roads.	Assessed Housing Need (OAHN) 2016. The whole District has been looked at to consider where development should be situated. Policy 22A has been amended so that where appropriate, other uses such as residential, recreation, employment and leisure will be supported to bring vitality into the town centre of Kidderminster as retail patterns have changed.
Historic England	LPPO1261	Settlement hierarchy	Support	Supportive of the varied comments relating to the historic environment throughout the document and the description of what is locally distinctive about the different settlements in Wyre Forest	Support for the Settlement Hierarchy is noted.
	LPPO347	2.3	Comment	It should be noted that community identity is even stronger within villages, especially Cookley, and therefore should be preserved and not merged and attached to Kidderminster.	Agree that community identity can be strong in smaller communities.
	LPPO434	2.2	Comment	What percentage increase of the current WF population has been calculated/ assumed for the period of the new plan? Does the number of new proposed houses reflect the calculated/ assumed increase in WF	An Objectively Assessed Housing Need (OAHN) to assess the number of dwellings required was carried out in 2016 and updated in 2018. The population of Wyre Forest District increased by 1.1% from 2013 to 2015, and a further 1.1%

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				<p>population?</p> <p>If there is a difference in these numbers, what does this difference represent?</p>	<p>between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036^[1].</p> <p>^[1] ONS 2016-based Subnational Population Projections</p>
	LPPO3669	2.3	Object	<p>2.3 The character, community identity and distinctiveness you refer to in the plan, will be lost as Kidderminster becomes a soulless commuter town. You have not shown any evidence as to how these additional residents will contribute to the growth and of Kidderminster as they will continue to shop and use facilities external to the town such as Merry Hill, Birmingham and beyond.</p> <p>Kidderminster is a market town with historic characteristics, links to the carpet industry, a rural outlook. You have not shown any evidence as to how these characteristics will be maintained and how the additional residents will add to the characteristics and distinctive nature of the town.</p>	Comments noted.
	LPPO473	2.3	Support	Support for para 2.3	Support for paragraph 2.3 is noted.
	LPPO170	2.6	Comment	As Bewdley attracts tourists, a coach park should be made available again.	Comments noted.

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	LPPO348	Transport	Comment	I would disagree and say that Cookley does not have reasonable transport as this service is temporary and does not run after 6pm. The continuation of the existing bus service is vital to numerous residents who feel isolated due to lack of transport facilities. The continuation of a temporary bus service is vital to numerous residents who already feel isolated and cannot visit or go for a night out away from the village for fear of missing the last bus home.	Cookley is not as well served as Kidderminster in terms of bus services however it is much better served than the villages in the west of the district. Cookley is very well served in terms of facilities including retail.
Land Research & Planning Associates Ltd	LPPO539	2.7	Comment	The reason that areas like Far Forest and similar rural settlements have fewer facilities is because the local plan structure of the past Local Plans has continued for over three decades containing each of these settlements with a tightly drawn settlement boundary or none at all. This has had an unhealthy constraint and discouraged growth so that young people can remain locally. PPG001 has not been followed in this PO document. Rural settlements growth should be encouraged. This document particularly Option A does not deal with this.	Comments noted.
	LPPO2410	2.9	Object	Para 2.9 notes the poor air quality at Welch Gate Bewdley, yet this apparently intractable and severe problem does not appear to have been considered in the Council's preferred options. Until, or if, the air quality is improved	Both the AQMA's and Green Belt are taken into consideration when assessing sites. A comprehensive Green Belt review has been carried out as part of the evidence base studies for the emerging Local Plan.

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				<p>to at least acceptable standards, there is no scope for increasing housing in Bewdley on the west of the river, as this will inevitably increase traffic (regardless of the nature of the housing) and hence exacerbate the poor air quality.</p> <p>This paragraph also notes the importance of protecting, conserving and, where it is possible to do so, enhancing the District's rich natural environment and historic assets. This does not appear to have been taken into account sufficiently in relation to proposed development of Green Belt. In my view, it is also important, for maintaining the distinctiveness of each of the two towns, to preserve the current area of Green Belt between Bewdley and Kidderminster.</p>	
	LPPO2934	2.9	Object	<p>Policies of the Local Plan Review do not seem to require flexible design and layouts 'future proofing' development so as to take account of important population changes such as 'ageing' over the plan period.</p> <p>Although the LPR states (1.19) that Wyre Forest housing market 'constitutes a self contained Housing Market Area', considering the statistics at table 8.0.4 and 2.9 the social issues of</p> <ul style="list-style-type: none"> • static population growth; 	<p>Design and layout of residential sites will form part of the planning application for a site.</p> <p>Comments noted.</p>

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				<ul style="list-style-type: none"> • a very high proportion of resident aged 65+ • the need to ensure that residential development caters for all groups in society’, <p>It makes limited proposals for how this apparent lack of appropriate housing mix could be achieved (8.16, beyond bungalows for the 65+ age group). Higher quality homes and those that 65+ might be prepared to downsize to are not represented in any detailed way, although affordable housing is mentioned. Para 6.9 only refers to what ‘might’ happen, rather than what ‘will’ happen-seeking to address the management of supply in all its house-type range/ownership, via approved policies that follow through from the comments of 8.16. Where are adaptability for the future and building codes?</p>	
	LPPO3670	2.9	Object	<p>2.9: How can you ensure that working age people will work in Kidderminster? You have shown no evidence of the employment for these people. Their employment will continue to lie outside of the area. How can you ensure that there will be the professional, manufacturing, employment needs required other than small retail outlets which will not be sufficient to grow the town as you suggest.</p> <p>The evidence you provide will not create</p>	<p>It is not possible to ensure that residents work in Kidderminster however by allocating land for employment purposes means job creation within the District which may encourage residents to work in the District.</p> <p>The 2016 Employment Land Review found that the majority of residents living in Wyre Forest District also work in the District.</p>

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				enough quality employment in the key areas to enhance the town as you suggest.	
	LPP0398	2.9	Comment	<p>This section describes attempts to 'engineer' the make up of the population rather than address residents' needs.</p> <p>The focus needs to be on recreating the attractive Kidderminster town centre we once had - and thereby present Kidderminster to potential investors as a proactive and forward thinking authority rather than one in denial e.g. a council member recently describing Kidderminster as having a 'thriving' town centre when interviewed by Central News.</p> <p>The council would benefit from independent advice on how to regenerate to meet modern needs.</p>	<p>The Local Authority has considered alternative uses to retail in the town centre to enhance vitality.</p> <p>Policies consider alternative uses in the town centres. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation, employment and residential.</p>
Wyre Forest Friends of the Earth	LPP01306	Public Transport	Comment	In the previous consultation the respondents' highlighted "Very poor public transport" Developing sustainable transport over the plan period will be difficult because of the current low levels of investment in public transport particularly the bus service.	Comments noted.
Wyre Forest Green Party	LPP01407	2.10	Comment	The previous consultation highlighted respondents' issue with "Very poor public transport" Developing sustainable transport over the plan period will be difficult because of	Comments noted.

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				the current low levels of investment in public transport particularly the bus service.	
	LPP02729	2.10	Comment	Comment - Key Issues and Challenges - paragraph 2.10, page 16 - A lot of people will resist the development of Green Belt sites as long as there are brownfield sites which haven't been built on. A policy needs to be put into place that ensures that all brownfield sites have been built on prior to any construction on Green Belt land. Brownfield sites simply being 'earmarked' for construction is not enough since many sites have been earmarked for development for some time without much in the way of progress being made.	Wyre Forest District Council has to allocate greenfield or Green Belt sites as there are not enough brownfield sites left, however, it is not within the power of Wyre Forest District Council to make developers develop brownfield sites before greenfield.
	LPP01756	2.10	Object	<p>Objects to building on Green Belt. Concerned about traffic, pollution, impact on health, animal habitats and the natural environment.</p> <p>Concerned about being saturated with continual housing that has an impact on crime rates and house prices.</p> <p>Strongly objects to both Plan A and Plan B.</p>	<p>Wyre Forest District Council has to allocate land for development. If the Local Plan was not reviewed and the Council did not have a 5 year housing land supply developers could apply for planning permission anywhere in the District.</p> <p>The Local Authority has evolved their strategy for development based on evidence. This includes an Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal.</p> <p>The policy of the Council for many years has been to build on brownfield land but there is not</p>

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					enough left and so greenfield and Green Belt sites have to be considered.
	LPPO2726	2.10	Object	Table 2.10 details that there are very poor public transport services and high traffic density. Therefore whichever option is provided, these need to be addressed, otherwise it is not local planning but letting local market demands drive developments.	2.10 are the comments received from respondents from the Issues and Options consultation. Sites in the emerging Local Plan have been considered by the highways department at Worcestershire County Council.
	LPPO289	2.10	Support	Support for para 2.10	Support for paragraph 2.10 is noted.
CORE11	LPPO149	2-10	Support	Support for paragraph 2.10.	Support for paragraph 2.10 is noted.
	LPPO36	Leisure facilities	Comment	If more people are to be encouraged to use the swimming pool and gym, why was it a. Built in such an out of way place with no public transport facilities and b. a small car park. The only way people can get there is to use their cars, and if the car park is full, the only option is to park on the road. At least in the centre of town it was easily accessible to all people, including children who could walk or use public transport to get to it, but now they haven't any means to accessing it.	The position of the leisure centre is serviced by the Route 1 Kidderminster circular service, a half hourly service, from Kidderminster bus station. Passengers are able to flag down a bus immediately opposite the leisure centre. The Council have sought planning permission for the car park at the leisure centre to be extended to increase the parking available to users of the leisure centre.
	LPPO2165	Social and	Comment	The district council seems to be indicating that	Comment is noted.

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		Economic Issues		<p>in order for the area to prosper, we as a community need to encourage working age families to the area so that there is a better balanced 'Circle of Life' in the area.</p> <p>This makes sense. There does need to be room to allow younger generations to come through and make Wyre Forest an aspirational place for them to live.</p>	
Wyre Forest Green Party	LPP01406	Table 2.0.1	Comment	The Horsefair Air Quality Management Area (AQMA) extends well beyond the Horsefair. It includes the Ringway to its junction with Coventry Street and includes Coventry Street to the junction with Radford Avenue. This is important when considering the impact of additional traffic.	Both proximity to the AQMA's and traffic impact are considerations that are taken into account when assessing sites.
	LPP0288	Table 2.0.1	Comment	<p>Population age profile is not surprising given the lack of work and training opportunities. Opportunities need to be created to address this issue.</p> <p>Looking at the retail profile, Wyre Forest is seen as a low wage area and therefore one generally has to travel to other areas for better quality options.</p>	<p>The age profile shows that the District has an ageing population and fewer numbers of young people due to the lower birth rates.</p> <p>Wyre Forest District does have a lower wage area, employment land will be allocated through the Local Plan which may give more employment options within the District.</p>
	LPP0474	Table 2.0.1	Comment	I wish to highlight the phrase "Virtually static population growth".	The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need

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					<p>(OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p> <p>[1] ONS 2016-based Subnational Population Projections</p>
	LPPO502	2.9	Comment	<p>Why do we need 5400 houses built as the population is static? Older people do not want to move from their homes where they have lived in for many years. I work with older people and it becomes very important that people with memory loss stay as long as possible in familiar surroundings.</p> <p>As Weavers Wharf was developed the rest of the older town centre has started to die. New developments do not mean that the Town improves it just shifts the money from older established retail outlets to those that have a national feel and a tight marketing strategy behind them.</p>	<p>The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p> <p>The Local Authority has considered alternative uses to retail in the town centre to enhance</p>

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				Once you allow the development of the Green Belt on the Eastern part of the town it will not suddenly give higher grades to students, lower body mass index of school children or raise wages. It will give developers more money, it will cause even greater transport problems as most people work outside of Kidderminster, And the Green Belt will be lost to all for ever. The environmental 'look' driving in to Kidderminster from Blakedown will be very different. Biodiversity will be reduced.	vitality. Policy 10B and Policy 22A consider alternative uses in the town centres. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation, employment and residential.
Worcestershire County Council, Planning Economy & Performance	LPP01075	Table 2.0.1 2.9	Comment	<p>Table 2.0.1 in section 2.9 correctly highlights that population growth in Wyre Forest district is not going to be high over the next 20 years, and that a high proportion of residents are aged 65+.</p> <p>Between 2016 and 2026, there is likely to be a significant increase in people aged 75+. Due consideration therefore needs to be given to the needs of an ageing (and elderly) population and their needs particularly as people are not only living longer but are also living longer with poor health or complex health issues.</p>	<p>Comments noted.</p> <p>The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036^[1]. There will be a marked increase in the number and proportion of older residents. The population aged 65+years is expected to increase by 28.1% from 24,200 in 2016 to 31,800 in 2036^[2].</p> <p>A major strategic challenge for the Council is to ensure a range of appropriate housing provision, adaptation and support for the District's older population. The number of people across the Wyre Forest aged 65 or over is projected to increase significantly during the Plan Period, from 24,200 in 2016 to 31,800 by 2036 (31.4%</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					increase) The increase in the population aged 80 or over is considerable, rising from 5,900 to 11,200 persons during the period 2016-2036 (89.8% increase). [1] ONS 2016-based Subnational Population Projections [2] ONS 2016-based Subnational Population Projections
Historic England	LPP01262	Table 2.0.1	Comment	Within the table relating to environmental issues we would recommend that 'historic assets' is amended to 'heritage assets' to comply with National Planning Policy Framework (NPPF) terminology.	This has been amended in line with the comments.
Wyre Forest Friends of the Earth	LPP01305	Environmental Issues	Comment	The Horsefair AQMA extends well beyond the Horsefair. It includes the Ringway to its junction with Coventry Street and includes Coventry St to the junction with Radford Avenue. This is important when considering the impact of additional traffic.	Both proximity to the AQMA's and traffic impact are considerations that are taken into account when assessing sites.
	LPP0324	2.0.1	Comment	No plan seems to account for social issues. We need parks and open space to encourage activity for all age groups.	Comments noted.
Land Research & Planning Associates Ltd	LPP0533	2.8 - 2.9	Comment	There is a substantive area to the west of WFDC area that is not Green Belt that could accommodate some more housing around the	Comments will be considered.

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				<p>smaller settlements where landowners are willing to allow say at least 50% affordable homes or starter homes. This would accommodate a considerable amount of the shortfall and help sustainability to rural areas.</p> <p>PPG 001 states that Rural Settlements should be allowed development in order to remain alive and sustainable. This does not appear to be the case in this PO document either for OPTION A or B.</p>	
	LPPO350	Aging population	Comment	<p>As you state, we have an aging population and these residents may need smaller affordable accommodation. Large scale developments could put them in danger of being priced out of the market and a low level supply of affordable rented accommodation.</p> <p>Therefore not catering for our communities needs.</p>	Wyre Forest District Council wants to ensure that developments have a range of size of dwellings to cater for communities including an ageing population. The Council also wants a range of affordable accommodation including affordable rented accommodation.
	LPPO354	Table 2.0.1	Comment	<p>If the population growth is 'virtually static', why the need for so much development?</p>	<p>The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015,</p>

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					and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1]. [1] ONS 2016-based Subnational Population Projections
Land Research & Planning Associates Ltd	LPP0540	2.0.1	Comment	Needs thinking in how to ensure young persons are and can be accommodated in local rural areas/settlements. The opportunity exists to allow rural settlements away from the Green Belt to expand and thrive. We are now starting the age of the ELECTRIC CAR and transport or similar types of energy to promote this. Electric charging can now take place at home. The majority of the population use a motor car. The need of the use of the motor car meaning development is not sustainable is now outdated and is not good argument in respect of the lack of sustainability and fresh thinking on this is urgently needed.	There is a cost involved owning an electric vehicle or a petrol/diesel vehicle, many people cannot afford a car and are dependant on public transport so sustainability is relevant.
	LPP02935	East of Kidderminster (S)	Comment	The LPRPO document states "Virtually static population growth", so why is the plan suggesting an extra 6000 plus houses?	An Objectively Assessed Housing Need (OAHN) to assess the number of dwellings required was carried out in 2016 and updated in 2018. The population increased by 1.1% (2001-2011), however the population increased by a further 1.1% from 2013 to 2015, and a further 1.1%

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					<p>between 2015 and 2017.</p> <p>The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036^[1]. There will be a marked increase in the number and proportion of older residents. The population aged 65+years is expected to increase by 28.1% from 24,200 in 2016 to 31,800 in 2036^[2].</p> <p>Agree that the elderly may want to downsize and this would free up larger family homes, however this does mean that some suitable accommodation for the elderly may need to be built.</p> <p>^[1] ONS 2016-based Subnational Population Projections</p> <p>^[2] ONS 2016-based Subnational Population Projections</p>
	LPPO2962	Table 2.0.1	Comment	<p>Loss of recreational land/long-term air pollution will put further stress on the local healthcare system</p> <p>Building on large areas of the Green Belt will also increase the possibility of flash floods and drainage problems</p>	<p>The Local Authority seeks to protect Green Belt as much as possible, however, however additional development is required based on evidence which includes an Employment Land Review (ELR) 2016, updated 2018 and Objectively Assessed Housing Need (OAHN)</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					<p>studies 2016, updated 2018.</p> <p>The location of Air Quality Monitoring Areas (AQMA's) are considered when possible sites are assessed.</p> <p>The emerging Local Plan seeks to ensure that residents can access open space by footpaths and cycle ways for their health, well being and fitness.</p>
	LPP04048	Table 2.0.1	Comment	<p>Page 14, Para 2.9 Table 2.0.1 <i>“Although population static, there has been a 9% increase in the number of households as the number of residents per unit of accommodation is falling”</i>. Over what period of time? What where is the evidence?</p>	<p>The information is from household projections (2012-based) which show that in Wyre Forest District, the number of households is predicted to grow by 9% 2012-2037.</p> <p>Over the same period, the average household size in Wyre Forest is projected to fall from 2.25 to 2.12. 2.32 to 2.18.</p>
	LPP04171	Table 2.0.1	Comment	<p>The WFDC Consultation Document states that the district has “virtually static ‘population growth’ and ‘. Has a low level of in-migration’ This is confirmation that there is no strong demand for the proposed quantity of new housing. This lack of demand is further confirmed by the fact that the average paid house price in Worcestershire is £244,562, whereas in Kidderminster it is only £201,124. The document later states that there is a</p>	<p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017.</p> <p>The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036^[1].</p>

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				growing population. As there is little or no natural growth, in my opinion, any sudden increase would have to be fuelled by in-migration from an undisclosed agreement with Birmingham to accept overspill.	[1] ONS 2016-based Subnational Population Projections
	LPP04710	2.0.1	Comment	<p>From Table 2.0.1 - Virtually Static Population Growth.</p> <p>This means that there is no need for large developments of housing to satisfy local need. Although conceding that some development may be needed to accommodate the 9% increase in the number of households due to the number of residents per unit of accommodation falling. However this would be nothing like on the scale that is envisaged. If large developments are constructed it is inevitable that the majority of the houses will be sold to people moving in from outside the area. These will most likely already have jobs outside the immediate local area in places such as Birmingham and Worcester. This will inevitably lead to more commuting, largely by car. There is, quite rightly, much concern at the moment about pollution and air quality a high proportion of which is from motor vehicles. Environmentally this is very bad. We should be encouraging people to live close to their places of work, where sustainable means</p>	<p>An Objectively Assessed Housing Need (OAHN) to assess the number of dwellings required was carried out in 2016 and updated in 2018.</p> <p>The population of Wyre Forest District increased by 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. It is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p> <p>Changes in retail patterns have had a detrimental effect on Kidderminster town centre. The Local Authority has considered alternative uses to retail in the town centre to enhance vitality.</p> <p>Policy 10B and Policy 22A consider alternative uses in the town centres. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation, employment and residential</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>of transport such as walking, cycling and public transport can be encouraged.</p> <p>Kidderminster already suffers from acute congestion at peak time and this will add to that. Even those who commute by train are likely to drive to the station adding to local congestion and pollution.</p> <p>On Social Issues</p> <p>“High costs of providing healthcare for an ageing population with high obesity. Results in more medical intervention; for example, hospital stays or visits and visits to GPs.”</p> <p>Walking is one the most accessible forms of exercise and with high positive improvements to health. As stated earlier the Green Belt area between Spennells and Stanklyn Lane is a very valuable amenity area well used by walkers, the loss of this is hardly likely to help with the above.</p> <p>“Diversify the economy, create more skilled jobs to reduce out of District commuting and increase the retention of young educated residents.” This is a worthwhile aim but will take time, in the short to medium term the current plan is going to draw in people from</p>	<p>[1] ONS 2016-based Subnational Population Projections</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>outside the area currently in employment elsewhere increasing out of district commuting.</p> <p>Under Key Issues and Challenges Economic Issues for Wyre Forest it states</p> <p>“Other areas of the town centre which have been traditionally retail could change to other uses and the primary shopping area could be redefined.”</p> <p>Since the development of Weavers Walk the main retail centre has shifted and much of the old retail area is run down and underused. I would strongly support some of this having change of use from retail to either residential, or mixed use residential/commercial and the construction or adaption of existing buildings either completely or partially (above retail/commercial) outlets into flats. This could at least partially meet the 9% extra predicted local need. As this increase is due to the occupancy rate of existing accommodation falling much of this increase would be for couples or single people who would not need larger family homes. Many of these are likely to be older people who would appreciate being within walking distance of the amenities and facilities that a revitalised town centre could</p>	

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				provide.	
	LPPO2724	Table 2.0.1	Object	<p>Table 2.01 highlights the social and economic issues affecting the district.</p> <p>Clearly the economic issues impact the social issues, and therefore these should be given priority when considering district planning. Therefore planning for businesses should be given paramount attention. West Midlands Safari Park and Severn Valley Railway being high profile businesses that can create inward migration that will cascade to the smaller local businesses. It is also paramount that strategic planning takes full advantage of HS2 investment, as if not fully planned and delivered initially there is no second chance. So high profile lobbying needs to be done now, so we don't miss out on this huge national investment.</p> <p>This is particularly relevant when the qualification levels at GCSE and above require improvement. This can only be done with commitment in the form of structure educational planning and resources provision.</p>	Social, economic and environmental issues are all linked so these three issues all need to be taken into consideration in the emerging Local Plan.
	LPPO1682	Table 2.0.1	Object	<ol style="list-style-type: none"> states “Virtually static population growth” which negates the need for a massive number of houses. Smaller numbers as identified by table 2.0.1 for 	The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				affordable housing/downsizing can be met through Brownfield sites/town centre regeneration. This LPR is fatally flawed in its projection of 6000 new dwellings.	(OAHN) in 2016 and updated in 2018. Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036. [1] ONS 2016-based Subnational Population Projections
	LPPO1683	Table 2.0.1	Object	All social, economic and environmental points raised in above table are reasons NOT to pursue the LPR. The extrapolations used to estimate number of new dwellings is flawed, being based on national figures NOT on actual local figures, as proved by the statement in table 2.0.1 “Virtually static population growth.”	The Local Authority has evolved their strategy for development based on evidence for Wyre Forest District. This includes an Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal.
	LPPO3377	Option A	Object	<ul style="list-style-type: none"> The population growth figures aren't accurate as they appear to have been rounded up. 	The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018. Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015,

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					<p>and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p> <p>[1] ONS 2016-based Subnational Population Projections</p>
	LPPO3411	Option A	Object	<ul style="list-style-type: none"> Projected population figures aren't realistic. 	<p>The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p> <p>[1] ONS 2016-based Subnational Population Projections</p>
Gemini Properties	LPPO1190	Table 2.0.1	Support	Table highlights key considerations that need to be taken into account including ageing population, need to attract economically active people, need to diversify economic base and	Many key considerations are being taken into account in the plan making process which includes evidence base studies.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>retain younger people and improvements to shopping offer and improvements in Kidderminster town centre.</p> <p>This requires a flexible approach to development. Kidderminster town centre needs to provide a range of retail opportunities and supporting facilities such as restaurants and leisure uses. This will also broaden the economic base. It would also be appropriate to direct new care facilities or the elderly to the town centre. Flexible uses should be encouraged to sites within and surrounding the town centre. Para.14 of NPPF requires plans to be flexible and able to adapt to rapid change throughout the plan period.</p>	<p>The Local Authority has considered alternative uses to retail in the town centre to enhance vitality.</p> <p>Policies in the emerging Local Plan consider alternative uses in the town centres. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation, employment and residential.</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
CORE11	LPP0150	3-1	Support	Support for paragraph 3.1.	Support is noted.
	LPP0435	3.0.1. Para iii	Comment	<p>Kidderminster town centre has a large proportion of retail outlets that remain unoccupied and are not maintained - this has been the case for a number of years.</p> <p>Are there any plans to convert unused town centre retail or unoccupied property to housing use? If not, why not?</p>	Comments noted. The council works with Empty Property owners who want to bring properties back into use and would support conversion of units where it is appropriate to do so.
CORE11	LPP0151	3-3	Support	Support for paragraph 3.3.	Support is noted.
Land Research & Planning Associates Ltd	LPP0544	3.4	Comment	Insufficient land is proposed to satisfy the severe critical shortage of affordable homes.	Comments are noted. The OAHN Study published in April 2017 identified the housing need for Wyre Forest District for the plan period. This study informed the level of new housing development that would be required in the district, including affordable housing. The proposed site allocations presented in the Preferred Options document were informed by the evidence in the OAHN study. Since the Preferred Options consultation, the Government has published their new Standardised Methodology for calculating housing need. The OAHN study is therefore being revised and will use the Governments new Standardised Methodology. The final selection of site allocations in the emerging Local Plan will be based on this revised

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					OAHN study.
	LPPO2413	3.4	Object	Para 3.4 makes clear that the plan should set out a clear economic vision and strategy for the area, which positively and proactively encourages sustainable economic growth. I cannot see such a vision and strategy reflected in the preferred options. And, again, recent developments have shown WFDC to be too ready to accept developments offering only poor quality, low paid employment while sacrificing other objectives. I cite again the planning approval for the water park on Green Belt at the Safari Park as an example here. The plan provides rhetoric of a limited ambition for the area, but fails to convince that even these modest aims would be likely to be achieved.	Comments are noted.
	LPPO436	3.4 para d)	Comment	What is the percentage buffer to be incorporated into the 5 year housing plan by WFDC? How have WFDC performed in the past?	The percentage buffer is set out in the NPPF, para 47 where it states that in order for LPAs to boost significantly the supply of housing LPAs should “identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					<p>20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land."</p> <p>The Council's Five Year Housing Land Supply Report shows how Wyre Forest District has performed in the past. This report is published and available on the Council's Planning Policy web pages for viewing.</p>
	LPPO3724	Paragraph 3.5	Object	<p>Previous plans produced by the Council have failed to deliver. The Council lacks the required skills to correctly and objectively formulate a workable plan that is practicable and takes full account of risks and impact to the 'idealised fictitious vision' it feels it has to be seen to be in pursuit.</p> <p>The passage refers to a singular Preferred Option which is at odds with the document's Foreword that considers two Preferred Options. This gives little confidence in the document produced by the Council as to what it is talking about.</p>	Comments are noted.
Wyre Forest Green Party	LPPO1408	Table 3.0.1	Comment	The "Vision" section of this document states that by 2034 residents and businesses will rely increasingly on energy from locally generated renewable sources. This is quite an ambitious	Comments noted.

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				<p>target. In contrast this policy is very unambitious particularly the requirement for a minimum of only 10% of on-site renewable energy. The policy also states “unless it has been demonstrated that this would make development unviable”, so even the 10% target can be ignored</p> <p>How will “reduced levels of traffic congestion” (ix.) be achieved? We are sceptical of this without:</p> <ol style="list-style-type: none"> 1. Reversing the decline in bus services; 2. Creating a network of safe and direct cycle routes; 3. Investing in attractive and safe pedestrian routes. <p>The plan to have a bus interchange at Kidderminster Rail Station seems to have been dropped. The latest plan publicised in the local newspapers has no area for buses.</p>	
Wyre Forest Green Party	LPP01469	Vision	Comment	<p>“Residents and businesses rely increasingly on energy from locally generated renewable sources” (ii.) Other than small scale micro-generation such as domestic solar panels there is no evidence that there are any plans for renewable generation on a larger scale. A reduction in energy demand for domestic and commercial properties is vitally important. A</p>	Comments noted.

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				programme of insulating older properties and building energy efficient new homes would reduce fuel bills and bring energy demand to a level which could be substantially locally generated.	
Persimmon Homes Limited	LPPO1598	Table 3.0.1	Comment	<p>The vision and objectives should relate to the local area and aim to meet the expectations of national policy and guidance. The NPPF is clear about boosting housing supply in Local Planning Authorities areas to ensure that areas can continue to grow in a sustainable way.</p> <p>Aim should be an aspirational but realistic vision of how the Council wish to promote sustainable growth in the District. First bullet point to “maintain their distinctive and separate identities.” could be more positively worded to allow for the idea that growth can occur in the District in a planned and sustainable way.</p> <p>Fifth objective states that Bewdley will remain a thriving market town which meets the local community need. The overall vision for Bewdley needs to be more positive towards growth of housing to attract the people that it needs.</p>	Comments are noted.
Taylor Wimpey West Midlands	LPPO1711	Table 3.0.1	Comment	Vision broadly supported. The Vision envisages that new development is properly supported by the timely provision of suitable infrastructure. Taylor Wimpey recognises that the delivery of	Comments noted.

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				new infrastructure will be necessary to support new development to mitigate for needs arising from new residents and the opportunities that may exist for assisting in delivering strategic infrastructure projects that have a far wider benefit to businesses and residents within the District and could assist in addressing a number of the highlighted issues.	
	LPPO37	2034	Comment	Nobody can tell how Wyre Forest will look in 2034. I have been here 36 years and have seen Kidderminster transformed from a well established, pleasant living area to a run down and derelict slum.	Local Plan documents always include a vision for the area that they are aiming to achieve by the end of the plan period. The NPPF in para 150 states: “Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities.” It should reflect a collective vision for the sustainable development of the area. It should be aspirational but also realistic.
	LPPO251	question	Comment	Great vision! But will it happen? Not if you carry on with your present methods i.e. compulsory purchase of an old established business (Lloyds Garage) then knock it down and do nothing with the land! Except turn it into the most expensive rubble car park in the midlands. Do something about Buftons/the shopping mall on the north side of bridge street, this building has been empty for about 20 years, it looks an	The Lloyds Garage site that is referred to in this response is the proposed site allocation AKR/1 – Bridge Street Basins. The Buftons site is in the HELAA document and has therefore been considered as part of the Local Plan Review process.

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				eye sore that and the rubble car park make a complete mockery of your so called plans for improvement to the area.	
	LPPO399	3.1	Comment	This is nothing short of what I'd expect in 2017.	Comments are noted.
	LPPO421	3.0.1	Comment	This is nothing short of what I'd expect in 2017	Comments are noted.
Land Research & Planning Associates Ltd	LPPO541	3.0.1	Comment	<p>Part (i.)</p> <p>In respect of "The outlying villages have grown organically to meet their own needs"</p> <p>Unless settlement boundaries are expanded to facilitate further housing this will not happen. Where landowners are willing to provide land for up to 50% affordable homes and/or starter/self build homes to allow outlying villages to remain sustainable, and/or could incorporate further facilities such as a local shop/primary school or similar included then a Policy should be considered and adopted to allow such expansion.</p>	The emerging Local Plan has sought to identify possible sites for future housing allocations. Policy 18B also considers small scale residential developments on infill plots within the settlement boundaries of the three main towns and villages.
The Woodland Trust	LPPO531	Vision	Comment	We welcome the reference to the importance of green infrastructure in the vision for Wyre Forest. We would like to see the importance of trees and woods, as an important component of green infrastructure, recognised in the vision. Trees, in a variety of locations (e.g. street trees,	Comments are noted. Trees and woodland have been recognised in our emerging policy on Green Infrastructure (i.e. Policy 11D and Policy 14).

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				trees in parks and housing areas and in woodland) can also make an important contribution to tackling climate change, both in absorbing carbon and in enabling adaptation to the impacts of climate change (e.g. by alleviating the urban heat island effect or by reducing surface water flooding, providing shade for farm animals etc)	
Horton Estates Ltd	LPPO842	Vision	Comment	<p>Bullet point viii. within Table 3.0.1 relates to the economy. We consider that specific reference should also be made to the contribution that existing industrial estates in the rural area, such as Cursley Distribution Park, will make during the plan period to the District’s economy. We request that the final sentence be reworded as follows: “...they are supported by the rural economy including several existing and significant industrial estates where sustainable growth will have occurred, and sustainable tourism.”</p> <p>We also request an additional bullet point be added to refer to the effective reuse of PDL throughout the District in accordance with paras. 17 and 111 of the NPPF (where it is not of high environmental value). This would be supported by Objective 5 within Table 3.0.2: “Previously-developed land, which is not of high environmental value, will have been prioritised to meet development needs.”</p>	Comments are noted.

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North Worcestershire Water Management	LPPO900	Section 3.1 Table 3.0.1	Comment	<p>Objective ii) in Table 3.01 needs rewriting as there is no programme of floodplain management as such and the impact of increased water efficiency upon the risk of flooding is questionable. This objective currently reads: "The risk of flooding is reduced due to a programme of floodplain management, increased water efficiency, softer landscaping and extensive use of SuDS in new developments."</p> <p>Suggested wording: "The risk of flooding is reduced due to flood management and the extensive use of SuDS both in new developments and retrospectively"</p> <p>OR</p> <p>"Water management forms an integral part of the planning and design of developments. This includes the mitigation of flood risk, water efficiency and widely used SuDS."</p>	Comments are noted.
Kidderminster Harriers Football Club	LPPO927	Table 3.0.1	Comment	<p>The proposed 'Vision for the area' should also include stronger support for improved sports, academic and cultural facilities in the district.</p> <p>To support the NPPF (para. 7) requirement that the planning system performs a social role including supporting health, social and cultural well-being.</p>	Comments are noted.

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				<p>Add extra bullet; <u>Sport and recreational facilities are expanded in the district with their increased use, resulting in health and welfare benefits. This will include the improvement of existing facilities on land to be a centre for sporting excellence, south of Kidderminster for the relocated Kidderminster Harriers Football Club.</u></p>	
Chaddesley Corbett Parish Council	LPPO1033	Table 3.0.1 / 3.0.2	Comment	<p>Vision for the economy and employment needs (tables 3.0.1 and 3.0.2)</p> <p>Realising this vision will need:</p> <ul style="list-style-type: none"> • A strategy and policies that will attract and retain higher value employers • Provision of locations for employment that have easy and rapid connection to the regional transport infrastructure (motorways and inter-city rail) <p>This argues for greater collaboration with neighbouring authorities that are closer to major transport infrastructure, rather than taking a purely parochial view.</p>	Noted and agreed. The Council continues to have Duty to Cooperate discussions with its neighbouring Local Authorities.
Place Partnership Ltd	LPPO1088	Table 3.0.1	Comment	Place Partnership Limited (PPL) manages the combined estates of Warwickshire Police (WP), West Mercia Police (WMP), Hereford & Worcester Fire and Rescue Service (HWFRS),	Comments are noted and agreed.

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				<p>Worcestershire County Council, Worcester City Council and Redditch Borough Council.</p> <p>The following are joint representations on behalf of WP, WMP and HWFRS to the consultation document. They concern only those policies and paragraphs that directly relate to the concerns and service priorities of the three emergency services:</p> <p>Table 3.0.1 – What will Wyre Forest District be like in 2034?</p> <p>The three emergency services are supportive of the direct reference in paragraph (x) of Table 3.0.1 that by 2034 crime and disorder in the District remain low and local residents feel safer.</p> <p>This ensures the Local Plan’s consistency with paragraphs 58 and 69 of the National Planning Policy Framework (NPPF), which state that planning policies and decisions should create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.</p> <p>The reference in paragraph (x) also helps to ensure the alignment of Vision with the vision for Wyre Forest contained within the ‘Single Sustainable Community Strategy for</p>	

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				<p><i>Worcestershire, which similarly envisages a 'district which people want to live in and visit; where they feel free from the fear of crime...'</i></p> <p>Paragraph (x) also ensures consistency between the vision and the following paragraphs and policies in the Local Plan on this topic:</p> <ul style="list-style-type: none"> • Paragraph 5.4 (b) (iv) • Policy 9 (5) • Paragraph 11.12 • Policy 27A (xiii) • Policy 27c (C) (v) • Paragraph 27.21 <p>Overall, the reference in paragraph (x) ensures an effective and sound message in the Vision. This will promote community safety, crime prevention and the provision where necessary of the design measures and infrastructure necessary to ensure this.</p>	
National Farmers Union West Midlands Region	LPP01117	Vision	Comment	We welcome the vision but we feel it ought to express more support for rural communities via the delivery of local housing and employment opportunities and also acknowledge the continued importance of agriculture to the economy.	Comments are noted.
Wyre Forest	LPP01307	Vision	Comment	The "Vision" section of this document states that	Comments noted.

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Friends of the Earth				<p>by 2034 residents and businesses rely increasingly on energy from locally generated renewable sources. This is quite an ambitious target. In contrast this policy seems very unambitious particularly the requirement for a minimum of only 10% of on-site renewable energy. The policy also states “unless it has been demonstrated that this would make development unviable”, without stating who would decide that it was non-viable.</p> <p>ii. “Residents and businesses rely increasingly on energy from locally generated renewable sources” Other than small scale micro-generation such as domestic solar panels there is no evidence that there are any plans for renewable generation on a larger scale. A reduction in energy demand for domestic and commercial properties is vitally important. A programme of insulating older properties would reduce fuel bills and bring down energy demand to levels which could be locally generated.</p> <p>ix. How will “reduced levels of traffic congestion be achieved”? It is difficult to see how this will be achieved without</p> <ul style="list-style-type: none"> a) Reversing the decline in bus services. b) Creating a network of safe and direct cycle routes. c) Investing in attractive and safe pedestrian 	

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				<p>routes.</p> <p>The plan to have a bus interchange at Kidderminster Rail Station seems to have been dropped. The latest plan publicised in the local papers has no area for buses.</p>	
	LPPO2411	Table 3.0.1	Object	<p>Table 3.0.1 lists an interesting set of descriptors for the district in 2034, but there is insufficient information on how the proposed developments would achieve these descriptors, even if all were desirable. This vision is further undermined by recent developments, such as the large KFC near to WFDC's headquarters, which would seem to discourage, rather than enhance, the likelihood of reducing obesity, one of the increasingly negative features of the area.</p>	<p>There is further work to do on the emerging Local Plan, but the Vision is what the Plan as a whole is aiming to achieve by the end of the plan period. The policies within the Plan will help to achieve the vision.</p>
	LPPO3721	Table 3.0.1 viii	Object	<p>Paragraph 3.1 table 3.0.1 part viii</p> <p>I object to the unrealistic vision for the South Kidderminster Enterprise Park to become 'the main focus for employment' The idea to 'industrialise' a traditional market town to compete with West Midlands is not based upon competitive advantage to which industrialists look for viability. Unless there is cheap land, cheap building, low business rates, low wages these aspects will not compensate for the costs of route to market for products from a town lacking connectivity to national transportation and</p>	<p>The Vision in viii states "The urban areas of Kidderminster and Stourport-on-Severn and the South Kidderminster Enterprise Park are the main focus for employment but they are supporting by the rural economy and sustainable tourism." Therefore, the Vision is not just referring to 'South Kidderminster Enterprise Park'. Employment development is an important element of making a place sustainable.</p>

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				communication infrastructure. These aspects will all needs to be addressed before investors are attracted to a viable business model. The Council is operating beyond practical attainment with occluded thinking. The focus for employment should be dispersed throughout the town to avoid areas becoming run-down.	
	LPPO3722	Table 3.0.1 x	Object	<p>Paragraph 3.1 table 3.0.3 part x</p> <p>This statement is completely at odds with the current planning proposals to pave over large swathes of green belt and conflicts with vulnerable users, healthier lifestyles. It is also inconsistent with 3.2 table 3.0.2 Objective 6.</p>	Comments noted. Green Belt release will be required to provide enough land to meet the Districts development requirements. The Local Authority has a statutory duty to meet housing and employment need for the District.
	LPPO443	3.0.1	Object	<p>Your plans do not support your vision. You foresee "...outlying villages have grown organically to meet their own needs..." and "...the larger villages of Cookley and Blakedown continue..." but your plans are to double the size of Cookley with the core site at Lea Castle. Doubling the size of a village is most certainly NOT growing organically. Should Option A at Lea Castle be selected, Cookley will be annexed to Kidderminster (you will be able to walk from Kidderminster centre to Cookley centre without passing through any fields, greenbelt etc). Cookley will not be a village, it will be a suburb of Kidderminster.</p>	Disagree. The Lea Castle site does not form part of Cookley village.

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Taylor Wimpey West Midlands	LPP01549	Table 3.0.1	Support	<p>Vision broadly supported.</p> <p>The Vision envisages that new development is properly supported by the timely provision of suitable infrastructure. Taylor Wimpey recognises that the delivery of new infrastructure will be necessary to support new development to mitigate for needs arising from new residents and the opportunities that may exist for assisting in delivering strategic infrastructure projects that have a far wider benefit to businesses and residents within the District and could assist in addressing a number of the highlighted issues.</p>	Support for the Vision is noted.
	LPP0475	Table 3.0.1	Support	<p>I agree with this plan for the future and particularly wish to highlight the phrase "The outlying villages have grown organically to meet their own needs". As a resident of Cookley I am concerned about the plans to build up to 600 properties on the old Lea Castle Hospital Site and wonder about the pressure it will put on the school and the Doctors surgery in Cookley. I also wish to highlight this phrase "New development in Wyre Forest is properly supported by the timely provision of suitable infrastructure." At the moment there is insufficient infrastructure for this type of development.</p>	Infrastructure is being considered as we progress with the site allocations in the emerging Local Plan. An Infrastructure Delivery Plan (IDP) was produced for the Preferred Options and will continue to be updated as we develop the Local Plan. The revised IDP will be published at the next consultation on the emerging Local Plan.
Homes England	LPP0792	Table 3.0.2	Comment	<p>HCA generally supports the Council's objectives in Table 3.0.2, particularly in relation to addressing the challenges of housing delivery to meet local</p>	Comments noted.

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				needs and the housing requirements for the District.	
Horton Estates Ltd	LPPO844	Aims and Objectives	Comment	Supports Objective 5 relating to maximising the reuse of PDL both within and beyond the main towns. Significant areas of PDL exist beyond the main towns, including industrial estates such as Cursley Distribution Park, and it is important that sustainable redevelopment and growth of these sites is supported even where they lie within the Green Belt (in accordance with paragraph 89 of the NPPF). Following on from the above, the view is taken that Objective 6 should be expanded to refer to the Local Plan's identification of specific PDL sites.	Comments are noted.
Kidderminster Harriers Football Club	LPPO929	Table 3.0.2	Comment	To support the NPPF (para. 7) requirement that the planning system performs a social role including supporting health, social and cultural well-being. Add to Plan Objectives, Point 1 To address the key challenges facing the District especially in terms of housing, employment, <u>health</u> and transport.	Comment is noted and agreed. The word 'health' to be added to the objective wording. (Policy 9 is about 'Health and Well Being'.)
Kidderminster Harriers Football Club	LPPO930	Table 3.0.2	Comment	To promote sporting opportunities in the district and improved health in accordance with NPPF. And to address some of the health issues of the district as identified by the evidence and highlighted in the Issues and options responses.	Comments are noted.

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				Add to Plan Objectives, Point 9. <u>To increase provision and to facilitate greater access to sport, recreational and other community facilities in order to encourage improvements in the population of the district's health and welfare.</u>	
Historic England	LPP01264	Table 3.0.2 Plan Objective 8	Comment	We would recommend an amendment to Plan Objective 8 as we do not consider that the sentence is appropriate in its current format. We would recommend that there is a specific heritage objective that sets out how the plan will have a positive strategy for the historic environment, as per the NPPF.	<p>Comment on Table 3.0.2 Plan Objective 8 noted.</p> <p>ACTION:</p> <p>Amend Plan Objective 8 to read:</p> <p>"To maximise opportunities for the inclusion of Green Infrastructure into high quality development in order to provide a good quality of life and maximise the benefits of walking and cycling."</p> <p>Insert a separate heritage objective 9 to read:</p> <p>"To promote the historic environment and conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations".</p>

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Wyre Forest Friends of the Earth	LPPO1308	Aims and Objectives - Point 6	Comment	Point 6. We are against any intrusion into the Green Belt and do not believe that this will be necessary for reasons set out later in our response.	Comments noted.
	LPPO290	3.0.2	Comment	There are traffic issues to address in Bewdley and Stourport, not just in Kidderminster.	Comment noted and agreed.
	LPPO355	Table 3.0.2 - Point 7	Comment	<p>Point 7 - the traffic in Kidderminster is certainly a major issue, but I think the 'Kidderminster-Blakedown-Hagley' bypass idea of a good few years ago is not feasible anymore, due to development along the original route.</p> <p>Regarding rail, London Midland has lost its franchise and the new 'West Midlands Trains' is promising more and longer trains...we shall see. However, what Kidderminster lacks is an integrated transport system: there is an extremely poor bus connection from the station and I know several people who simply will not walk from the bus station to the rail station due to the ring road underpasses, as they do not feel safe.</p>	Comments are noted. We are working with the Highways Authority (Worcestershire County Council) to address the transport issues around new housing developments. The County Council have also published their Local Transport Plan, which was adopted in 2017.
Taylor Wimpey West Midlands	LPPO1714	Table 3.0.2	Comment	<p>Aim and Objectives are broadly supported.</p> <p>However, there is not a specific objective relating to Stourport-on-Severn. It is the second largest town within the District, it would be prudent to identify an objective specifically related to the</p>	Comments noted.

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				town in order to contribute towards achieving the identified aim.	
Taylor Wimpey West Midlands	LPP01550	Table 3.0.2	Comment	Aim and Objectives supported.	Comments are noted.
Land Research & Planning Associates Ltd	LPP0542	3.0.2	Comment	3.0.1 is repeated.	Comment noted.
	LPP04755	3.0.2	Comment	<p><u>Objective: To encourage economic diversification and make sufficient high quality sites available</u></p> <p>The definition of ‘high quality site’ depends on the use to which that site is to be put. Economically, small industrial /commercial units in small towns are likely to be more attractive to business, although previous experience does appear to suggest that Kidderminster has probably got an excess of such units. The availability of more than enough unoccupied units is unattractive to potential purchasers/tenants and will detract from property values/rental values in the District.</p> <p><u>Objective: To maximise the use of previously developed land.</u></p> <p>This, together with the sensitive redevelopment of Kidderminster town centre and other existing</p>	Comments are noted. Green Infrastructure Concept Plans are being prepared for the larger urban extension sites.

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				<p>sites, has to be the most important aspect of the Council’s priorities, in order to avoid the temptation of taking the easy, cheaper and less acceptable option of unnecessarily developing countryside and, more importantly, Green Belt sites.</p> <p><u>Objective: To maximise the inclusion of green infrastructure and heritage assets into well designed developments to provide a good quality of life and encourage walking and cycling.</u></p> <p>So far as this relates to the south-east of Kidderminster, the wholesale destruction of Green Belt would make these objectives difficult to achieve, irrespective of design. It beggars belief that such proposals can in any way be considered to encourage walking and cycling (or any of the other healthy, countryside activities presently enjoyed by local residents). Improvement in the “quality of life” as an objective is, quite frankly, unrealistic and, one has to assume that “green infrastructure” is an objective reserved for other parts of the district?</p> <p>Wyre Forest has few heritage assets but it is accepted that these have to be protected. It is however unlikely this consideration will have had much relevance to the choice of development</p>	

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				sites and will have little relevance to a choice between Options A or B.	
Worcestershire Wildlife Trust	LPPO1030	Table 3.0.2 Aims and Objectives	Object	We would strongly recommend that a specific objective to protect and enhance the district's biodiversity be added to the list. Protection and enhancement of biodiversity is an important component of sustainable development and is captured in legislation and planning policy to such a degree that it ought to be reflected in the main objectives of the local plan (see for example Section 40 of the Natural Environment and Rural Communities Act 2006 and NPPF paras. 9 and 109 for justification). Such an objective would also link to the first line of Aim ii of the overall Plan vision, which is otherwise not captured in the objectives.	Comments are noted.
	LPPO3723	Table 3.0.2 Objective 7	Object	Paragraph 3.2 table 3.0.2 Objective 7 The alternative route for though traffic will encourage an increase on undesirable use of road transport for Worcester traffic which will bypass the town core and bring no business to Kidderminster. Possible traffic calming measures would reduce benefits of the business case for the new road.	Comments noted. The Transport Modelling study will inform what road improvements are needed for the District. We also seek advice on transport issues from the Highways team at Worcestershire County Council.
	LPPO2412	Table 3.0.2	Object	The plan objectives in 3.0.2 do not address important factors such as air quality in Bewdley, even though the air quality at Welch Gate is	Comments noted. Air pollution and Air Quality Management Areas (AQMA) is addressed in Policy 16A.

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				already well below the allowed standard. While this may be a difficult problem to address, a local plan that ducks this issue is weak, inappropriate and unsupportable.	
Bromsgrove & Redditch DC	LPPO896	Table 3.0.2	Support	The Bromsgrove Council supports the aims and objectives of the plan and think that it has the potential to provide a strong base for planning in Wyre Forest once adopted, although a number of reservations do exist where clarity needs to be provided in order to the Council's concerns to be allayed.	Support and comments are noted.
Kidderminster Civic Society	LPPO1173	Table 3.0.2 Aims of the plan	Support	Fully Support the aims of the plan.	Support is noted.
Sport England	LPPO208	Table 3.0.2	Support	Welcome last bullet. Note active lifestyles can be promoted more widely than just via green infrastructure and heritage assets and in particular would advocate embedding 'Active Design' in local plan policy to increase opportunities for physical activity. https://www.sportengland.org/facilities-planning/active-design/	Support is noted.
Land Research & Planning Associates Ltd	LPPO543	3.0.3	Comment	Parts B & C should ensure that sufficient housing land is allocated as per sections 28 and 35 to allow expansion of rural areas to provide social and economic benefits as per 2 of the bullet	Comment noted. The proposed sites continue to be evaluated to identify the most suitable sites and the final proposed site allocations will be included in the pre-submission documents.

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				<p>points in the NPPF.</p> <p>The present PO document is deficient and does not provide for this. It is therefore not in accordance with the advice in the NPPF and that of PPG 001.</p>	
	LPP01757	Sections 8, 9, 11, 13	Object	<p>Objects to building on Green Belt. Concerned about traffic, pollution, impact on health, animal habitats and the natural environment.</p> <p>Worried about being saturated with continual housing that has an impact on crime rates and house prices.</p> <p>Strongly objects to both Plan A and Plan B.</p>	<p>Objections noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>
Gladman Developments Limited	LPP01196	Paragraph 3.1	Comment	<p>Recommend that the vision is amended at point vii to include a positive reference that makes clear that the identified needs of the housing market area will have been met in full by 2034. This is in line with NPPF.</p> <p>Point v on Bewdley highlights that this will be a 'thriving market town which meets the local community's needs'. This should mean both market and affordable housing needs. Bewdley Housing Survey Report (2016) should be taken</p>	Comments noted.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 3: VISION FOR THE AREA IN 2034

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>into account. In summary house prices are seen as unaffordable with a shortfall of 213 affordable homes in the next 10 years, especially 2 bed. over 18 years of the plan period this would equate to 383 dwellings. Vision needs to be clarified to explain that Bewdley will meet its market and affordable housing needs in full.</p> <p>Welcome recognition in objectives that Plan will address key challenges in terms of housing employment and transport. This objective would be bolstered further through recognition that these challenges can only be met by positively planning to meet objectively assessed development needs in full.</p> <p>A suitably positive vision must be fully reflected through policies that are capable of securing its delivery. Issues faced in the wider West Midlands area should not be forgotten when considering the context for Wyre Forest through its local plan vision and objectives.</p>	
	LPPO4814	Vision	Comment	<p>There is no vision in this plan. Why not develop new villages around the district with modest enlargements of exiting villages? This is what people want. The Consultants report commissioned by Wyre Forest District Council talks of Masterplanning. Although this is a Local planning review, I see no signs of Masterplanning</p>	<p>Chapter 3 sets out the Vision for the Plan area and sets out the Plan Aims and Objectives. The NPPF requires us to locate new development in the most sustainable locations. The most sustainable locations in the District are the three towns, i.e. Kidderminster, Stourport and Bewdley. The</p>

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 3: VISION FOR THE AREA IN 2034

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>in the overall approach. Wyre Forest District Council has a chequered history with Masterplanning. There was a Masterplan for the Spennells development which was excellent, but was silently dropped when the Head of Planning retired.</p>	<p>majority of the new development is therefore focussed on these three towns. For further information, please refer to the Sustainability Appraisal and the Site Selection Topic Paper.</p>
	LPP03671	Section 3	Object	<ul style="list-style-type: none"> • You have not shown evidence how the distinctiveness will remain as the town becomes a commuter town. • The varied landscapes and rural nature will be threatened, you have not shown enough evidence to ensure they will be protected. The remaining areas will become crowded, at increased risk of fly tipping, flooding as you build over Green Belt and remove natural barriers to flooding; trees land. • Kidderminster has not to date benefited from existing regeneration. What evidence is provided to ensure that this will differ? There are empty homes, on previous developments and retail outlets in the town plus on the Worcester Street remain vacant. By removing fields and greenfield sites you will increase potential for poor health as you remove facilities such as dog walking, cycling, and walking in open countryside. You have not shown any evidence as to how the air quality will 	<p>Objection is noted. The emerging Local Plan is based on evidence – this is known as the evidence base documents in which there is a whole range of documents, including in particular the Objectively Assessed Housing Need Study, Employment Land Review, Green Belt Study, Retail study, etc.</p> <p>The emerging Plan has also been informed by the Strategic Flood Risk Assessment study which has helped to identify the sites which would be more susceptible to flood risk.</p> <p>The council works with Empty Property owners who want to bring properties back into use and would support conversion of units where it is appropriate to do so.</p> <p>The OAHN study tells us what the District requirement is for C2 use, i.e. care homes for the elderly, during the plan period.</p> <p>The Employment Land Review study tells us</p>

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 3: VISION FOR THE AREA IN 2034

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>be improved with the onset of increased traffic flows, congestion, and removal of green field sites and destruction of the countryside.</p> <ul style="list-style-type: none"> • There are currently a large number of care homes with vacancies - What evidence is provided to ensure care home will not be surplus to requirements. You have talked of regeneration however this is contradictory to your plans to build more homes for the elderly. • You have shown no evidence to confirm how the jobs of sufficient number to meet the needs of the 6000 homes in Kidderminster. To suit what is effectively a new town, there needs to be a much wider range of jobs than tourism, minor manufacturing and small retail outlets. 	<p>what the employment requirement is for the District during the plan period.</p>
Historic England	LPPO1263	Vision	Support	We support the vision and the reference to heritage throughout.	Support for Section 3 Vision for the Area noted.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 4: CORE POLICIES INTRODUCTION

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Land Research & Planning Associates Ltd	LPPO545	4.1	Comment	<p>The drastic need of land to provide the critical shortage of affordable homes has not been addressed in this document.</p> <p>Simply sacrificing the shortage of affordable homes by attempting to say the plan is sound in that there may be sufficient land to accommodate normal market homes is not acceptable, nor is it in accordance with 47 - 49 of the NPPF. So the plan is not sound as it stands.</p>	Comments are noted. The OAHN Study has identified the housing need for Wyre Forest District during the plan period. This study informs the level of new housing development that is required in the district, including affordable housing.
CORE11	LPPO152	4.2	Support	Support for paragraph 4.2.	Support is noted.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Land Research & Planning Associates Ltd	LPPO546	Policy 5A	Comment	<p>Recent Case Law (03 July 2017) gives rise to the argument that if land is within a settlement boundary the premise of "the presumption of sustainable development" should apply. Generally means that any planning application on any land outside a settlement boundary is considered not sustainable.</p> <p>Development is "Plan Led" and provides a framework to assess planning applications. Unless rural settlement boundaries are relaxed during the plan making process the amount of development within them is limited to the extreme. Settlement boundaries hierarchy began in the 1980s, many rural settlements have had little or no expansion to their boundaries since. This situation leads to a massive social division. There is no properly considered expansion of rural settlements in this PO document during the plan assessment process and consequently this document is not in accordance with PPG001 nor the NPPF.</p>	Policy 6B sets out the Settlement Hierarchy for the District. As this is a Green Belt District we have undertaken a Green Belt review which has helped to inform which areas of the Green Belt should be released. Many of our villages are washed over by Green Belt and the Study has advised that this should remain the case.
Worcestershire County Council, Planning Economy & Performance	LPPO1077	Policy 5A	Comment	<p>Item (v) under sub-section (c) in paragraph 5.4 refers to</p> <p><i>"Protecting important historic buildings, monuments, sites of archaeological significance and the integrity of local planning designations"</i>. This</p>	Comments noted and amendments agreed.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>raises the question of what the definition of "important" is, as used here? What will constitute an important heritage asset? The NPPF consistently uses "significance", although "importance" is mentioned once in NPPF paragraph 128. In any event, what level of significance or importance does this policy imply is required to render these heritage assets and designations worthy of protection? Use of the word "important" here may unintentionally result in conflict/debate about the importance of any heritage assets that are affected by development proposals and, while the NPPF does specifically make reference to determining the "value" of heritage assets that would be affected by development proposals in paragraph 129, this is again couched in terms of "significance". We therefore suggest that consideration is given to either omitting the word "important", substituting it for "significant", or perhaps introducing some form of weighting/value in the reasoned justification as to what constitutes important. As an example, in this context important sites and designations could potentially include designated heritage assets (e.g. listed buildings, scheduled monuments, registered parks and gardens, or conservation areas), non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments,</p>	

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>and heritage assets included on a Local List.</p> <p>Part B of Policy 5A states that:</p> <p><i>"Planning applications that accord with the policies in the Plan (and where relevant, with policies in Neighbourhood Plans) will be approved unless material considerations indicate otherwise".</i> We consider that the wording of this policy point requires some adjustment to reflect the fact that the Waste Core Strategy and Minerals Local Plan also form part of the Development Plan covering Wyre Forest District. We would suggest rephrasing the policy point as follows (additions in bold, deletions in strikethrough):</p> <p>"Planning applications that accord with the policies in the</p> <p>Development Plan (and where relevant, with policies in Neighbourhood Plans) will be approved unless material considerations indicate otherwise", and referencing the Waste Core Strategy, Minerals Local Plan and Neighbourhood Plans in the supporting Reasoned Justification. For the same reasons, part C should also refer to the Development Plan.</p>	
Taylor Wimpey	LPPO1459	Policy	Comment	Policy 5A is consistent with the presumption of	Comments on Policy 5A are noted.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
West Midlands		5A		<p>sustainable development as in the NPPF.</p> <p>Policies and proposals in the Local Plan need to positively seek opportunities to meet the development needs of Wyre Forest, including the OAHN and provide flexibility to adapt to rapid change.</p>	
Taylor Wimpey West Midlands	LPPO1715	Policy 5A	Comment	<p>Policy 5A is consistent with the presumption of sustainable development as in the NPPF.</p> <p>Policies and proposals in the Local Plan need to positively seek opportunities to meet the development needs of Wyre Forest, including the OAHN and provide flexibility to adapt to rapid change.</p>	Comments on Policy 5A are noted.
	LPPO3963	Development	Comment	<p>Overall, the plan does not require enough of prospective developers. Some of the sites are significant areas and masterplans, guiding principles and 'green infrastructures' should be required at this stage in the Local Plan and at Outline. Specifying the need for future-proofing designs, layout principles so as to drive uniqueness in Landscape, access, housing and open space, as well as providing for housing designs adaptability for future purposes, with regard to new technologies as well as existing green ones, should be made explicit in the Local Plan. It would set a standard that reassures local communities that new areas will add</p>	Comments are noted. Green Infrastructure Concept Plans and Masterplans will be required for the larger site allocations as the Local Plan evolves. This will include green infrastructure proposals.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				to their betterment in living near to it- it will have direct benefits for them- by green routes connected open spaces and clear identities by block designs and legibility. Such broad principles have to be set out in the Local Plan now so as to be sustainable for the future and deliver excellence where there is already a presumption of approval by NPPG guidance.	
Campaign to Protect Rural England	LPPO920	Policy 5A	Object	The emphasis of the policy is inappropriate. It seems to imply that any proposal that a developer may bring forward can potentially be made acceptable. There is no point in having a plan, if it is not made clear that proposals for major development of unallocated sites will be refused. If that is not done, developers will argue that sites that have been considered in the course of the site selection process and rejected are also sustainable, so that planning consent should be given. A further clause should be added to Policy 5A to make it clear that such applications will be refused.	Comments noted. However, if we are unable to maintain our Five Year Housing Land Supply in the future then it is important that we have a policy such as Policy 5A in the Local Plan. Also, the NPPF sets out a presumption in favour of development.
	LPPO3672	Policy 5A	Object	The plan is not sustainable. Green Belt land cannot be used indefinitely. I do not agree with 5A and do not believe the report has reasoned justification as the Housing Need report does not back this up.	Objection is noted.
Worcestershire	LPPO1031	Policy	Support	Support policy.	Support is noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Wildlife Trust		5A			
Gladman Developments Limited	LPP01197	Policy 5A	Support	Gladman are fully supportive of the emphasis of Policy 5A. It provides assurance of a local approach that will proactively seek to improve the social, environmental and economic well-being of the area by ensuring that development demonstrably contributes to the specific strategic and local vision and objectives of the Local Plan. The ethos of sustainable development is key to assessing planning proposals.	Support for Policy 5A is noted.
CORE11	LPP0153	5.2	Support	Support for paragraph 5.2.	Support is noted.
Land Research & Planning Associates Ltd	LPP0547	5.3	Comment	The Plan does not provide sufficient land for the vital social need for affordable/starter homes. This is essential economically, environmentally and socially.	The Local Plan aims to provide good quality housing serving a range of needs, types and tenures, including affordable housing.
Land Research & Planning Associates Ltd	LPP0548	5.4	Comment	Requires serious modifications covered in previous comments.	Comments noted.
	LPP0444	5.4	Comment	<p>An Economic Role: None of the items listed are supportive of development at Lea Castle - effectively a group of houses in a field. None of the requirements listed are met.</p> <p>A Social Role: None of the items listed are supportive of the development at Lea Castle - Cookley does not require 600 (or more) new</p>	Issues are noted. Employment use will form part of the Lea Castle development. Lea Castle does not form part of Cookley village; it is a separate area in its own right. Impact on natural environment will be addressed through on-site specific or off-site works via compensatory measures such as Biodiversity offsetting contributions,

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>houses, and a strong sense of place is most certainly not encouraged by doubling the size of the village and then (should Option A be agreed) annexing it to Kidderminster. Your proposals will destroy Cookley as a village. None of the requirements listed are met.</p> <p>An Environmental Role: At the Lea Castle site the environment will be decimated. Whilst the tree line will be left, it will be removed from the greenbelt and therefore will be unprotected in the future. None of the requirements listed are met.</p>	financial contributions to restore or improve existing ecologies and environments. A Green Infrastructure Concept Plan is being produced for the Lea Castle site and will help to inform the site allocations policy and help shape future development on site.
North Worcestershire Water Management	LPPO902	5.4	Comment	Under 5.4 c An environmental role I miss a link to flood risk/water management?	Noted. Amendment required.
Wyre Forest Friends of the Earth	LPPO1309	5.4	Comment	a.iii Promoting accessibility to everyday facilities for those who want to move away from car use or do not have the use of a car will require a determination by the local authority to ensure that basic services are located close to communities they serve. A good rule of thumb is that facilities should be no more than 15 minutes walking distance from any point in a local community.	Comments are noted.
Wyre Forest	LPPO1411	5.4 bullet	Comment	Promoting accessibility to everyday facilities for	Comments are noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Green Party		point a.iii		those who want to move away from car use or do not have the use of a car will require a determination by the local authority to ensure that basic services are located close to communities they serve. A good rule of thumb is that facilities should be no more than 15 minutes walking distance from any point in a local community.	
	LPP04593	5.4 (b)	Comment	<p>There appears to be little increased health capacity provision in both the OAHN report and the Local Plan.</p> <p>Large Urban estates have evidenced increased anti-social behaviour and increased crime rates, which is acknowledged in the OAHN report but this is not covered in the Local Plan consultation.</p>	Infrastructure is a key issue that is being addressed through the Infrastructure Delivery Plan (IDP). Further infrastructure will be delivered through financial contributions and local or health authority investment to address any issues arising, where necessary and appropriate. Ongoing discussions with health authorities are being had as the Plan progresses.
	LPP04756	5.4	Comment	<p><u>Objective: The sensitive consideration of climate change issues.</u></p> <p>The Plan requires more houses, more industrial/commercial units and, takes account of an influx of more people to take up the new jobs. That inevitably produces a greater requirement for even more houses and more vehicles, which creates more pollution. That's inevitable and the damage is self-perpetuating. There is no apparent reference to climate change in the proposals, although specifications for new builds may be required to</p>	Comments noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing and employment need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. The Employment Land Review (ELR) sets out the employment requirement for the District.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				include specific features.	
	LPPO503	5.4	Object	Building 5400 homes will have a negative impact on biodiversity, landscape and traffic pollution, especially on the Eastern side.	It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District.
	LPPO3726	5.4	Object	Paragraph 5.4.a.i. The reference to ‘sufficient’ is not objective and is open to interpretation by different readers. The plan does not clarify when ‘sufficient’ land will no longer be obtainable for future generations after towns have spread out into each other following ‘sustainable’ development plans such as this one. The plan does not recognise that there is finite land availability for an island nation and this will at some point become consumed by plans having no regard for the wider picture. As such this is not a plan that is sustainable.	Objection noted. The word ‘sufficient’ is taken from the National Planning Policy Framework (NPPF) paragraph 7, bullet point 1.
	LPPO292	5.4	Support	Support for para 5.4	Support is noted.
Place Partnership Ltd	LPPO1089	5.4 (b)(iv)	Support	WP, WMP and HWFRS fully support the inclusion of this reference and agree that the achievement of it is a fundamental component of truly sustainable development. It also ensures the Local Plan is consistent with paragraphs 58 and 69 of the NPPF on the same subject.	Support is noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>Paragraph 5.4 (b) (iv) also accords with national planning practice guidance, which states:</p> <p><i>'...The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation...'</i></p> <p>Paragraph: 010 Reference ID: 26-010-20140306</p> <p>Revision date: 06 03 2014</p> <p>Therefore the inclusion of the reference will ensure the effectiveness and soundness of the Local Plan.</p>	
	LPPO3729	5.5	Support	I support this statement.	Support is noted.
Wyre Forest Friends of the Earth	LPPO1310	5.6	Comment	"....promotion of local food production....."Intrusion into the green belt will reduce local food production. The proposed extension of Spennells will mean the loss of good quality agricultural land which in June 2017 was growing a crop of barley.	Comment noted.
Wyre Forest Green Party	LPPO1403	5.6	Comment	Section 5.6 mentions "....promotion of local food production....." whilst the planned intrusion into the Greenbelt will reduce local food production. The proposed extension of Spennells, for example, will mean the loss of good quality agricultural land which in summer 2017 was growing barley. Past	Comments noted.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				years have seen crops of wheat, peas, potatoes and beets	
	LPPO3731	5.6	Support	The 'well designed buildings and places' should also consider multi-story apartments to make efficient use of scarce land and suit the lower dwelling occupancy rate sighted in paragraph 2.9 table 2.0.1 bullet 7	Support and comments noted.
	LPPO504	5.6	Support	The Land is used as farm land why build on it?	It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY (excluding paragraphs 6.54-6.57)

Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
Barratt Homes West Midlands	LPPO814	policy 6A	Object	We believe the plan period should be extended beyond 2034 by at least 2 years to allow for potential delays and still be NPPF compliant. Development requirements should be adjusted accordingly. The emerging plan does not make provision for growth requirements from outside of Wyre Forest. It is possible that Wyre Forest will be asked to help with need from Birmingham and the Black Country. The development requirements of Policy 6A should be referred to as a 'minimum' requirement. This will help to foster sustainable development.	<p>Agree that the plan period should be extended by 2 years. For the pre-submission plan we have extended the plan period by 2 years to 2036, giving a 20 year plan period (2016 to 2036).</p> <p>We continue to have Duty to Cooperate discussions with our neighbouring local authorities. These discussions have included the Black Country LAs and Birmingham City Council.</p>
Horton Estates Ltd	LPPO845	Policy 6A	Comment	RPS has made separate and detailed representations on the proposed housing requirement under this Policy on behalf of Persimmon Homes South Midlands. Our Clients support these representations, which assert that the Council's current housing target of 300dpa is not reflective of the evidence presented within the 2017 Objective Assessment of Housing Need (OAN) Study. The Council's own evidence indicates that, when adjusted to account for migration trends and suppression of household formation, the demographic need for housing increases to 332dpa, which is already higher than the Council's proposed requirement figure. Furthermore, when taking market signals and affordable housing into account, this need increases further to 468dpa. RPS considers that the minimum OAN that should be considered by the Council in Policy 6A is 468dpa, which would significantly increase the	The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government's new standardised methodology.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY (excluding paragraphs 6.54-6.57)

Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				<p>housing requirement figure over the plan period to 8,424 dwellings. A summary of the OAN steps involved is provided below:</p> <ul style="list-style-type: none"> • Demographic Starting Point – 199dpa • Demographic Adjusted Figure <ul style="list-style-type: none"> ○ Longer term migration trends – 291dpa ○ Household formation adjustment – 332dpa • Employment Led – 332dpa • Market Signals – 398dpa • Affordable Housing – 468dpa 	
	LPPO394	Policy 6A	Object	<p>There have been many new houses built in Kidderminster over recent years, in particular on the Stourport Road and the old Sugar Beet site, where there is still space for more houses. I question whether the quantity of new housing being proposed is actually required.</p>	<p>Objection noted. The former sugar beet site is one of the proposed site allocations.</p>
Gemini Properties	LPPO1191	Policy 6A	Object	<p>We believe the plan period should be extended beyond 2034 by at least 2 years to allow for potential delays and still be NPPF compliant. Development requirements should be adjusted accordingly. The emerging plan does not make provision for growth requirements from outside of Wyre Forest. It is possible that Wyre Forest will be asked to help with need from Birmingham and the Black Country.</p>	<p>Agree that the plan period should be extended by 2 years. For the pre-submission plan we have extended the plan period by 2 years to 2036, giving a 20 year plan period (2016 to 2036).</p> <p>We continue to have Duty to Cooperate discussions with our neighbouring local</p>

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY (excluding paragraphs 6.54-6.57)

Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				The development requirements of Policy 6A should be referred to as a 'minimum' requirement. This will help to foster sustainable development.	authorities. These discussions have included the Black Country LAs and Birmingham City Council.
Campaign to Protect Rural England	LPPO921	Policy 6A	Support	We welcome the requirement for zero extra comparison retail. The number of empty shops in the upper (or eastern) part of Kidderminster Town Centre makes it clear that Kidderminster has more than enough retail space. The also applies to the other two towns. A separate paper on managing retail decline accompanies this.	Support is noted.
Gladman Developments Limited	LPPO1340	Policy 6A	Object	<p>Policy 6A will set development requirements for district over plan period 2016-34. These should be minimum requirements based on robust and credible evidence. Gladman are concerned with the manner in which OAHN has been established for Wyre Forest District in terms of definition of Housing Market Area and consideration of multiple factors set out in NPPF and NPPG. it is considered there is significant justification to warrant adoption of 332 dpa from the OAHN range presented by Amion in their report as a minimum requirement.</p> <p>Any issues of unmet development needs arising from the wider area should be clearly considered through this policy.</p> <p>Housing need should be expressed as a minimum target over the plan period and the capacity of the</p>	The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government's new standardised methodology.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY (excluding paragraphs 6.54-6.57)

Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				<p>housing allocations contained within the plan should be capable of meeting and exceeding this minimum requirement whilst maintaining a rolling five year housing land supply.</p> <p>Still awaiting publication of Government's proposed methodology for calculating housing needs. Question whether figures in Policy 6A are appropriate. A revised approach is likely to be required at the next stage of the Local Plan.</p>	
Persimmon Homes Limited	LPPO1421	Policy 6A	Object	<p>Plan Period should be extended beyond 2034, by at least two years to introduce flexibility should any delays in its preparation occur. As a consequence, the development requirements should be adjusted to take account of the extended time period.</p> <p>The emerging plan does not currently make provision to accommodate development to meet the growth requirements of Birmingham, the Black Country or any other Local Authority area. It is suggested that Wyre Forest District forms its own Housing Market Area (HMA), notwithstanding the robustness of this claim. However, ongoing discussions will need to be held with the neighbouring authorities in order to consider the strategic priorities and the delivery of new homes.</p> <p>No agreed distribution of Birmingham City housing need shortfall of 37,900 dwellings and the Black</p>	<p>Agree that the plan period should be extended by 2 years. For the pre-submission plan we have extended the plan period by 2 years to 2036, giving a 20 year plan period (2016 to 2036).</p> <p>We continue to have Duty to Cooperate discussions with our neighbouring local authorities. These discussions have included the Black Country LAs and Birmingham City Council.</p>

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				<p>Country Authorities shortfall which is understood will be at least 22,000 dwellings. It is suggested that Wyre Forest forms its own HMA, it is extremely close to the administrative area of Dudley, which is part of Black Country area. In addition, Wyre Forest is in relatively close proximity to Birmingham City and is easily accessible by road and rail to the West Midlands conurbation. As a consequence, it is entirely possible that Wyre Forest will be asked to assist with meeting the growth requirements of the conurbation.</p> <p>This has two potential impacts. First, it could delay the preparation of the emerging Wyre Forest Local Plan, and this supports the extension of the plan period as suggested. Second, it could result in the housing requirement in the plan being increased. As a consequence, the overall housing requirement should be kept under review and policy 6A will need to be substantially revised following the publication of the Black Country Core Strategy.</p> <p>NPPF supports housing in sustainable locations. It requires Local Authorities to “boost significantly” the supply of housing land. It also supports sustainable economic development. The development requirements of Housing Policy 6A should be referred to as “minimum” development requirements that can be exceeded through sustainable development proposals. This approach has been adopted by a</p>	

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				<p>significant number of authorities elsewhere in order to support and foster the delivery of sustainable development.</p> <p>The SHMA identifies an OAHN requirement for 5,400 dwellings during the plan period. It is good practice to over allocate to ensure that the OAHN figure is met. There is some uncertainty regarding delivery of some brownfield allocations. Plan should allocate 15% more housing than the OAHN figure (6,210 dwellings), in order to ensure that the need for housing is met. If WFDC need to accommodate housing need from the Black Country, it will be necessary to increase the housing provision in Wyre Forest by some 2200 so overall need will be 8,410 for the plan period to 2034 (i.e. 467 pa) and to 9,344 if the plan were to be extended by 2 years. These figures do not include the allowances for C2 uses.</p> <p>This increase will also help to accommodate some of the Birmingham's overfill. The existing rail link between Birmingham and Kidderminster, together with the direct road link via the A456, means that the Wyre Forest area also has a functional link with the Birmingham conurbation. Positive planning to accommodate housing pressures will help to reduce house price inflation and ensure that houses are provided for local people too. This will ensure that the workforce can be accommodated in order to fulfil the</p>	

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				economic aspirations of the plan area.	
Persimmon Homes Limited	LPPO1571	Policy 6A	Comment	<p>Evidence underpinning this assessment is the 2017 OAN Study. This supersedes the previous 2016 OAN Study, which identified a range of scenarios for the determination of housing need, before settling upon a midpoint of 254dpa. The Council's latest evidence indicates an uplift in the housing need for the District, led in part by the inclusion of newer population and household projections (2014-based).</p> <p>We offer comments on the existing methodology in the context of consistency with the NPPF and NPPG.</p> <p>As part of the Council's modelling, a number of scenarios have been tested to consider what the impact of varying assumptions will have on the determination of the Council's housing need.</p> <p><i>Demographic Uplifts</i></p> <p>Table 3.2 of the Council's 2017 OAN Study indicates a number of sensitivity tests undertaken to the 2014-based population projections to consider the impacts of longer term migration trends than those used in as part of the government forecasts. The short term forecasts (PG-Short Term/PG-Short Term X) broadly follow the migration profile of the 2014-based projections, whereas the long term scenarios (PG-Long</p>	The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government's new standardised methodology.

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				<p>Term/PG-Long Term X). These scenarios indicate that when using longer term trends than those of the 2014-based population projections, there are increases to the total population change, and consequently, increases to the baseline dwelling stock. As indicated in Table 3.3 of the 2017 OAN Study, the longer term migration profiles draw on population estimates from the previous years which include higher proportions of working age population. This presents a population profile which serves to narrow the old age dependency ratio (percentage of 16-64 against 65+ population), thus responding to the notable ageing of the population in Wyre Forest. RPS is of the view that for Wyre Forest, the longer term population scenarios offer a more appropriate population profile than the 2014-based projections. The 2017 OAN Study has not modelled a 10-year migration scenario and on this basis, the PGLong Term X is considered the most appropriate scenario, which takes a 14 year migration profile, excluding Unattributable Population Change (UPC). This would present an annual household change of 291dpa.</p> <p>In addition to modelling alternative migration profiles the 2017 OAN Study has also considered making adjustments to the household formation rates which underpin the 2014-based household projections. This scenario (modelled under Table 3.4 of the 2017 OAN Study) takes into account suppression to household</p>	

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				<p>formation for the 25-34 and 35-44 age cohorts and proposes that these are returned to levels expressed in the 2008-based forecasts. Making adjustments to household formation rates is supported through the PPG and underpinned by academic research¹ in the area. RPS considers that this is an appropriate adjustment to make which, under the PG-Long Term X migration scenario, would increase the OAN to 332dpa.</p> <p><i>Labour Force and Employment Implications</i></p> <p>This section of the 2017 OAN Study seeks to demonstrate an alignment of the population and labour force, taking into account projections from Cambridge Econometrics, Experian and Oxford Econometrics. RPS agrees that these are appropriate sources of information to draw from though would also encourage the Council to consider how the growth in housing aligns with the proposed targets for employment growth.</p> <p>The three employment forecasts have been derived through a combination of past trends in the District and an assessment of future economic activity which would impact on the projections of growth. The Council's 2017 OAN Study indicates that the highest job forecast (Cambridge Econometrics) can be met through the adjusted long term migration scenarios,</p>	

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				<p>however consideration does not appear to have been given to whether the OAN is capable of supporting the Council’s employment growth target of 40ha included within emerging Policy 6A. This assessment should also be undertaken to ensure that the Council’s approach is thorough and robust.</p> <p>The 2017 OAN Study indicates that the demographic adjusted figure of 332dpa is capable of meeting the expected employment growth in the District through the plan period. Although RPS has not tested this in detail, for the purposes of this assessment, the figure of 332dpa has been taken forward in the OAN calculation process, albeit it should be treated as a minimum, given the Council may need to revisit this assessment in light of the employment growth targets as part of emerging Policy 6A.</p> <p><i>Market Signals</i></p> <p>Section 6 of the 2017 OAN Study reviews information associated with market signals in Wyre Forest, taking the view that the housing market in the District is relatively stable and there is no need for further adjustment to the OAN (paragraph 6.14 refers). RPS does not agree with this view and considers that the relationship of affordability pressures in the District warrant the need for further uplifts.</p>	

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				<p>The 2017 OAN Study makes a number of references to the recommendations of the Local Plans Expert Group (LPEG), which have been taken on board as part of the approach for the adjustment to household suppression. The LPEG recommendations also propose a methodology for the consideration of market signals, based on two indicators; median quartile housing affordability and lower quartile rental affordability. The LPEG recommendations (Appendix 6) indicates four brackets of potential market signals uplift ranging from 0% to 25% depending on the severity of affordability issues, which are replicated below:</p> <ul style="list-style-type: none"> i. House Price Ratio less than 5.3 and Rental Affordability less than 25% = No uplift ii. House Price Ratio at 5.3 - 6.9 and/or Rental Affordability between 25% - 29% = 10% uplift iii. House Price Ratio at 7.0-8.6 and/or Rental Affordability between 30% - 34% = 20% uplift iv. House Price Ratio at 8.7+ and/or Rental Affordability is +35%= 25% uplift <p>In terms of the median House Price Ratio, the latest data published for 2016 has been published by ONS, having taken over responsibility from the DCLG. ONS has provided two data sets for median affordability,</p>	

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				<p>based on ‘workplace’ and ‘residence’ based earnings. The workplace figures for Wyre forest indicate a ratio of 7.26 for 2016 compared to the residence based ratio of 6.35 Under the care of the DCLG the information that was gathered on affordability ratios was residence based earnings to house prices. The residence based dataset is considered a more appropriate dataset to use, which aligns with the historical projections provided by DCLG. The figure of 7.26 is therefore the most appropriate to use.</p> <p>In terms of rental prices, this can be calculated using lower quartile wages taken from ONS data, aligned with monthly rental data from the Valuation Office Agency (VOA). Set against a monthly lower quartile rental price of £475, this indicates that the rental affordability ratio for Wyre Forest is 33.2%.</p> <p>Relating this data to the LPEG methodology, it is clear that market signals do exist in Wyre Forest and an uplift of 20% should be attributed to the adjusted projections. When taking into account the migration adjusted profile and household formation rates, this increases the OAN from 332dpa to 398dpa.</p> <p><i>Affordable Housing</i></p> <p>The 2017 OAN Study acknowledges that the net annual affordable housing need is 229 dwellings per annum.</p>	

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				<p>Paragraph 8.11 of the study indicates that any new build required to meet this need can be accommodated within the OAN. Over the plan period 2016-2034, this equates to 4,122 dwellings. RPS does not consider that the Council has taken an honest appraisal of what the plan is expected to deliver.</p> <p>Draft Policy 8B of the consultation Local Plan indicates that the Council expect a minimum of 30% affordable housing to be delivered on schemes of 11 or more. Under the optimistic assumption that all of the 5,400 dwellings planned by the Council triggered this policy, this would only deliver 1,620 affordable homes, only 39% of the total affordable housing need. Even under the policy approach advocated under the market signals (398dpa), this would still only be capable of meeting 52% of the overall affordable housing need. It is clear that the affordable housing need in the District is severe and is not capable of being met under the current housing requirements.</p> <p>Paragraph 7.9 of the 2107 OAN Study once again considers the recommendations of the LPEG report to Government as a way of considering an appropriate uplift to the OAN, indicating that an adjustment should be made to the OAN where the total number of homes necessary to meet the affordable housing need is greater than the adjusted OAN. The same paragraph of the study indicates that where this is the case, the OAN</p>	

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				<p>should be uplifted by a further 10%. This is only partially true, as the LPEG study indicates that in such cases an adjustment of 10% can be made or an uplift which will allow for the affordable need to be met in full. Under the Council’s current affordable housing target, this would require 763dpa to be built, in order to address the affordable need of 229dpa and set against the 10% uplift, the OAN would increase to 468dpa. RPS considers that whilst the Council should aim to meet the OAN for market and affordable need in full, a 10% figure appears to be more realistic at this point in time.</p> <p><i>Summary</i></p> <p>Consider that the Council’s current housing target of 300dpa is not reflective of the evidence presented in the 2017 OAN Study. The Council’s own evidence indicates that the when adjusted to account for migration trends and suppression of household formation, the demographic need for housing increases to 332dpa, which is already higher than the Council’s proposed requirement. When taking market signals and affordable housing into account, this need increases further to 468dpa. RPS considers that the minimum OAN that should be considered by the Council in Policy 6A is 468dpa, which needs to be factored into the later stages of plan making. A</p>	

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				<p>summary of the OAN steps involved is provided below:</p> <p>Demographic Starting Point – 199dpa</p> <p>Demographic Adjusted Figure</p> <ul style="list-style-type: none"> o Longer term migration trends – 291dpa o Household formation adjustment – 332dpa <p>Employment Led – 332dpa</p> <p>Market Signals – 398dpa</p> <p>Affordable Housing – 468dpa</p>	
	LPPO2232	Policy 6A - Development Needs	Object	<p>Believes that the Wyre Forest assessment of housing need of 5400 is an exaggeration and a little over 3000 is more realistic. Account has not been taken of reduced immigration due to Brexit and of an aging population seeking to downsize making more larger homes available. Therefore little green belt should be needed over the next 15 years. The greenbelt beyond Spennells and much of the core are east of Kidderminster should be removed from the plan.</p> <p>In the local press (July 6, 2017) it was stated that funding for the new station had been made available from deals with Greater Birmingham and Solihull Local</p>	<p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough</p>

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				<p>Enterprise Partnership for £1,8 million. A 'Deal' implies action by both parties. Is the other side of the 'Deal' that Kidderminster makes overspill housing available for Birmingham? Have Birmingham council also indicated that they will help to fund the eastern link road? Birmingham needs 89,000 new homes in the next 15 years, their Development Plan has been given the go-ahead to build 51,100. (Birmingham Mail 21 April 2016) Birmingham and Solihull Local Enterprise Partnership lists the names of its overspill satellite towns and names Wyre Forest as the one remaining area not at present a dormitory town.</p>	<p>deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfields sites within the Green Belt.</p> <p>Wyre Forest District does not form part of the wider Black Country or Birmingham Housing Market Areas and therefore does not directly need to accommodate any additional growth needs arising from these local authority areas. However, Duty to Cooperate discussions continue to be had with these neighbouring LAs as the Local Plan Review process progresses. Duty to Cooperate discussions between neighbouring local authorities are a requirement of the NPPF.</p>
	<p>LPPO1830</p>	<p>Housing Need</p>	<p>Object</p>	<p>I disagree that we need to use this Green Belt at all. You quite clearly state that there is only need for 199 dwellings per annum according to The National Statistics Sub National Population Projections (SNPP) 2014 . Why then have you escalated this to 300 per annum when you also quite clearly state that the population growth in our area is virtually static!</p> <p>Is this to take advantage of the governments incentive of £9000 per dwelling? along with the extra income of council tax? If so then I would point out that the 33%</p>	<p>The housing need is based on population data which includes births and death rates. It is also based on household projections. As the plan period is for 20 years, there will be an increase in population over this time. Also, there is an increasing elderly population in the district which means people are living longer and therefore staying in their homes for longer. In addition to this, the family unit is changing with more single parent families occurring. This puts pressure on the current housing stock.</p>

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				<p>of social housing will attract an element of housing benefit clients and this will of course force up your overall expense.</p>	<p>There simply isn't enough housing to cater for all these different needs over the plan period. In addition to this, people migrate into the area as well as moving out.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>
	<p>LPPO3030</p>	<p>Policy 6A - OAHN</p>	<p>Comment</p>	<p>1.) The OAHN, based predominately on the Amion Report, appears to have been accepted and the figure of 300 new houses a year has now become fact. In reality the 300 is at the upper end of all the projections and at best is a guess based arguably on historic evidence.</p> <p>2.) I understand that it is necessary to give a definite figure for the number of new houses required to satisfy some bureaucratic obligation, but that does not mean that we should commit to building this number whether we need the houses or not.</p> <p>3.) Kidderminster has been identified as a "self contained housing market" and as such, any new housing will depend largely on an increasing need for</p>	<p>Comments noted.</p> <p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government's new standardised methodology.</p>

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				<p>employment. However, there does not currently appear to be any employer requiring a large increase in the work force in the area. So any future employment growth will depend on relatively small business requirements. I know that Kidderminster is endeavouring to attract new business, but it is also apparent that there is a limit to how many small businesses Kidderminster can support. Looking around the area there are a lot of empty business premises, so I would suggest that we are approaching that new business limit. Indeed, the Amion Report in Section 4 shows no appreciable increase in employment over the period being considered. Also, just recently 2 of the remaining carpet factories have made significant redundancies.</p> <p>So where are all these new jobs for people requiring all this extra housing?</p> <p>4.) The Amion Report refers to the increasing relatively large number of retired generation, but in the longer term the effect of the “baby boomers” will disappear. Also, the latest report shows that the UK’s increasing longevity has considerably slowed down. This, together with the raised pension age should in time lessen the increase in the number of retired people.</p> <p>5.) Since the economic recession of 2008 we are now understandably going through a “catch up” of new</p>	

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				<p>house building everywhere. But, this will surely slow down once we have caught up with the current needs.</p> <p>6.) If the statement in the conclusion by Amion of “8.13 It is not envisaged that available land supply will inhibit achievement of the OAHN figure” is true, then why do we need to even consider releasing Green Belt Sites for building?</p>	
	LPPO4141	Policy 6A	Comment	<p>I am in favour of the council having a long term plan for the Wyre Forest, and recognise the need for some additional affordable housing in the future. However, I believe that the plan as it currently exists is desperately wrong in many aspects, inaccurate, and misjudged.</p> <p>I would like to know on what basis or accurate analysis the suggested growth of the future population has been based. What outreach and analysis has been to objectively look at what the future may look like in terms of revitalising Kidderminster overall? What are the alternatives for replacing the carpet and manufacturing base of our town? Without a planned and costed attempt to bring good jobs to the area I feel that planning for thousands of houses is futile. I desire to see a vibrant lively town, attracting a diverse population, with a properly planned coherent infrastructure to support them in every way. Both my children have now moved away to well paid jobs in</p>	<p>Comments noted. The housing requirement is base on the Objectively Assessed Housing Need (OAHN) study. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>The emerging Local Plan does include policies for affordable housing and will also look to provide a mix of housing types to cater for the needs of the community, i.e. 2 bed, 3 bed, 4 bed family homes. There will also be a C2 use requirement to cater for the needs of the elderly population.</p>

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				other areas of the country where the opportunities are better. I imagine I will not be alone within the projected time scale of this plan in needing to downsize my property, or be in need of care. Has any allowance been made for the age profile of the WF population with increased mortality rates and so many youngsters, like my own, moving away? My feeling is that the town will not require the number of houses planned, and I would welcome serious evaluation of indigenous population growth. This would more actually reflect actual future need.	
	LPPO4223	Policy 6A - OAHN	Object	I do not consider there is a proven need for 300 houses per year as Kidderminster population rate is below the national average. The countryside should be safe guarded by the Council and not used for housing.	Objection noted. The housing requirement figure was based on the OAHN study published in April 2017.
	LPPO4249	Policy 6A - Housing Needs	Comment	Having read LTP4, Green Belt Review and now the Local Plan Review I must conclude the statistics for housing requirement quoted within the documents commissioned are not accurately substantiated and, as such, should be challenged by WFDC before any decision on release of any Green Belt made. Wyre Forest has had a 'virtually static population growth' since 2001-2015 (2.2% at most using ONS statistics). Looking at the population of Kidderminster alone, from 2001 -2011 it dropped by 0.14%. An increase from 2011 Census to current estimate of population set in 2016 of 2.1% at most. If the figures were accurately reviewed and if the true objective of the LPR is to meet	Comments noted. The statistics used for the OAHN are statistics published by the Government from the Office of National Statistics. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published

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				<p>future housing needs of Wyre Forest in line with current projected growth figures – all development could be achieved on brownfield sites. It is therefore the duty of WFDC to ensure developers are not allowed to sit on brownfield sites and that all development of brownfield sites are completed before approving plans for Green Belt development.</p> <p>I believe the Local Plan Review to be a cynical attempt to provide a quick, unsustainable fix for the failing local economy. The LPR identifies a ratio imbalance of elderly to young and the increased impact that is having on services and ultimately finances of WFDC. The LPR identifies that educational standards within Wyre Forest are below that of national average – thus leading to low paid jobs and zero hour contracts, with very little opportunity for home ownership and personal development. Health within Wyre Forest is generally poor and a proactive stance on high levels of obesity is required. The LPR should identify these problems as core issues that need addressing and not covering over with a temporary influx of cash. The LPR promotes actively pursuing in-migration to resolve such issues.</p> <p>Whilst the new homes allowance of £9,000 per unit is an attractive incentive and 1735 units will generate £15,615,000 for WFDC, this is a shortsighted answer to the long-term problems facing Kidderminster and</p>	<p>their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>Wyre Forest as a whole. The introduction of new residents alongside the initial flush of cash will place a burden on already over stretched services. Even considering additional council tax, the proposed development of 3 & 4-bedroom family homes will not help balance the books.</p> <p>It is disingenuous to assume much of the aging population are not contributing to the local economy or are tying up family homes. My own family home will support three generations very shortly. My husband and I both work and run a small business, paying taxes at every level, not least business rates. We fall outside the optimum demographics laid bare within the LPR – which WFDC and their ‘Pro Growth Agenda’ are chasing. Are we to then interpret the LPR as saying in-migration (affluent) is the answer to supporting low paid, zero hour contracts and benefits, rather than WFDC addressing the root cause.</p> <p>Cala homes at Hagley are offering 100% exchanges for their Wychbury Fields development. The homes are within a perfect commuter corridor; have great access to rail links and outstanding schools – yet can’t sell.</p> <p>It is understandable that WFDC are scratching their heads whilst looking for an answer to the issues surrounding the economy of Wyre Forest. However, in only actively pursuing in-migration I believe you are</p>	

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				diverting your responsibilities away from an entire generation.	
	LPPO3376	Insufficient homes too many people	Comment	<p>Questions population growth within the UK and the impact it has.</p> <p>Believes that if more roads are built there will be more cars, could this analogy be relevant to homes as well.</p> <p>It creates a number of other major issues.</p> <ul style="list-style-type: none"> • Schooling • Hospitals • Traffic • Waste management • Job shortages 	Comments noted.
Worcestershire County Council, Planning Economy & Performance	LPPO1083	Policy 6A - Development Needs 2016-2034	Comment	<p>This policy states that 40 hectares of employment land is needed in Wyre Forest over the life of the plan. In "Duty to Co-operate" discussions we have previously highlighted the need to ensure any employment land provision is sufficient to enable some <i>Sui Generis</i> uses such as waste management facilities within the allocated areas. The Reasoned Justification supporting policy 6A focuses on housing provision, with little information provided about the requirements for employment land and we consider that there may be an opportunity to clarify this. However, we welcome the support given to "Waste Developments on</p>	Comments noted. We will consider these comments when updating the policies in the Plan.

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				<p>Employment Land" by Policy 21A (Urban Employment Land) and the supporting Reasoned Justification in paragraph 21.8.</p> <p>We note that similar support is not included within Policy 21B (Rural Employment). The Waste Core Strategy includes a Geographic Hierarchy, and parts of Level 1 (Kidderminster Zone) and Level 2 (Droitwich Spa Zone) of this Geographic Hierarchy are within Wyre Forest District. These cover parts of the rural hinterland surrounding the urban areas, and as such it would be reasonable to expect that some waste development may take place on rural employment land. Policy 21B as worded currently does not appear to favour such development on any scale. We would welcome some amends to the supporting text to acknowledge this and ensure that there is no conflict between development plan documents.</p>	
Stourport High School	LPPO1127	Policy 6A Development Needs	Object	The Plan Period should be extended beyond 2034. The Framework is clear that Local Plans should have a 15 year time horizon. The plan is currently expected to be adopted in 2019. Any delays in the plan making process has the potential for the adoption date to slip and the plan to not have a 15 year time period from the date of adoption and therefore not be a Framework compliant plan. The Plan Period should be	<p>Agree that the plan period should be extended by 2 years. For the pre-submission plan we have extended the plan period by 2 years to 2036, giving a 20 year plan period (2016 to 2036).</p> <p>We continue to have Duty to Cooperate discussions with our neighbouring local</p>

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				<p>extended by at least two years to introduce additional flexibility should any delays in its preparation occur. As a consequence, the development requirements should be adjusted to take account of the extended time period.</p> <p>The emerging plan does not currently make provision to accommodate development to meet the growth requirements of Birmingham, the Black Country or any other Local Authority area. It is suggested that Wyre Forest District forms its own Housing Market Area (HMA). Ongoing discussions will need to be held with the neighbouring authorities in order to consider the strategic priorities and the delivery of new homes.</p> <p>At the present time there is no agreed distribution of the significant Birmingham City housing need shortfall of 37,900 dwellings. In addition, the Black Country Authorities have recently confirmed that the emerging Black Country Core Strategy 2 will be unable to allocate sufficient land to meet the emerging objectively assessed housing figure. Whilst the full extent of the shortfall is yet to be established, it is understood that it will be at least 22,000 dwellings. As a consequence, an approach needs to be agreed for the distribution of this significant housing shortfall elsewhere. Whilst it is suggested that Wyre Forest forms its own HMA, it adjoins the administrative area of Dudley, which is part of Black Country area. In addition Wyre Forest is in</p>	<p>authorities. These discussions have included the Black Country LAs and Birmingham City Council.</p>

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				<p>relatively close proximity to Birmingham City. As a consequence it is entirely possible that Wyre Forest will be asked to assist with meeting the growth requirements of the conurbation.</p> <p>This has two potential impacts. Firstly it could delay the preparation of the emerging Wyre Forest Local Plan, and this supports the extension of the plan period as suggested. Secondly, it could result in the housing requirement in the plan being increased. As a consequence, the overall housing requirement should be kept under review and policy 6A require substantial revisions following the publication of the Black Country Core Strategy.</p> <p>Also it is a clear objective of Framework to support the delivery of housing in sustainable locations. Paragraph 47 of the Framework requires Local Authorities to “boost significantly” the supply of housing land. The Framework is also clear that sustainable economic development should be supported. The planning system should not act as an obstacle to sustainable economic growth. As a consequence, it is our view that the development requirements of Housing Policy 6A should be referred to as “minimum” development requirements that can be exceeded through sustainable development proposals. This approach has been adopted by a significant number of authorities elsewhere in order to support and foster the delivery</p>	

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				of sustainable development.	
Dudley Metropolitan Borough Council	LPPO1045	Table 6.0.1	Comment	<p>As a member of GBSLEP, WFDC took part in Strategic Housing Needs Study. This confirmed that WFDC did not form part of wider housing market area. As the south Worcestershire authorities have a recently adopted plan, for this plan WFDC is a freestanding HMA. Amion OAHN report 2017 notes ageing population and internal migration as main source of population growth. This mainly comes from Greater Birmingham and Black Country. OAHN study suggest OAN of 300 dpa, compared to demographically driven figure of 199 to take into account need for economic growth inline with the approach adopted by South Worcestershire.</p> <p>The Birmingham Development Plan acknowledges a shortfall of 37,900 dwellings and further evidence of a shortfall is emerging in the Black Country. With established migration patterns with WFDC from both these areas, it is logical to conclude that increased supply in WFDC is likely to be met by additional migration from GBBC HMA. The proposed modification to the Telford and Wrekin LP reflect this issue.</p> <p>We would welcome opportunity to discuss this matter under Duty to Cooperate procedure</p>	<p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.</p> <p>WFDC have undertaken a number of Duty to Cooperate meetings with Birmingham City Council and the Black Country Local Authorities and will continue to do so during the Local Plan Review process.</p>

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Hagley Parish Council	LPPO777	Policy 6A Development Needs	Object	<p>Housing Numbers</p> <p>NPPF requires WFDC to meet its Objectively Assessed Housing Need (OAHN). A paper was produced in 2016 indicating that the need was 254 dwellings per year, which exactly matched what had actually been delivered in recent years. 254 is greater than the old target under WFCS, which suggest that WFDC has not refused any applications on housing supply policy grounds. It follows that 254 represents unrestricted housing demand, which ought to be a very good indication of housing need. It thus seems that the target in the Consultation Document, far from being Objectively Assessed Need is a highly subjectively selected target. The target should only be 254 x 18 = 4572.</p> <p>Mitigation</p> <p>If WFDC pursue a target above its OAHN to meet Birmingham’s housing needs, and makes a contribution to its alleged housing land deficit, some very substantial offsite expenditure will be required to mitigate the damage to Hagley:</p> <p>A bypass round Hagley, or link road past it between A456 and A491, south of Hagley.</p> <p>Measures to make rail commuting more</p>	<p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.</p> <p>The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements for the emerging Local Plan.</p>

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				attractive. Currently a lack of car parking capacity at stations on the Kidderminster-Stourbridge-Birmingham line. Stourbridge Junction Station is full fairly early in the morning, and there is no easy way to enlarge it. The car park at Hagley holds 25-30 cars, with nowhere to provide more. Blakedown Station has little parking at all, and there is little capacity at Kidderminster Station. There is a large field next to Blakedown Station, immediately east of it, between A456 and the railway. The Plan should designate this as a potential rail-related Park and Ride car park.	
Bromsgrove & Redditch DC	LPPO897	Policy 6A	Comment	Bromsgrove DC has no reason to dispute the Development Needs outlined in table 6.0.1. Pleased to see reference at para.6.8 to duty to cooperate requirement. Acknowledge that WFDC does not form part of wider Birmingham HMA. It is important that Wyre Forest LP has sufficient mechanisms in place should a request to meet any needs from the wider BHMA are forthcoming.	WFDC continues to undertake Duty to Cooperate discussions with its neighbouring Local Authorities during the Local Plan Review process.
Birmingham City Council	LPPO893	Table 6.0.1	Comment	As a member of GBSLEP, WFDC took part in Strategic Housing Needs Study. This confirmed that WFDC did not form part of wider housing market area. As the south Worcestershire authorities have a recently adopted plan, for this plan WFDC is a freestanding HMA. Amion OAHN report 2017 notes ageing population and internal migration as main source of population growth. This mainly comes from Greater Birmingham and Black Country. OAHN study suggest	The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology. WFDC have undertaken a number of Duty to Cooperate meetings with Birmingham City

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				<p>OAN of 300 dpa, compared to demographically driven figure of 199 to take into account need for economic growth inline with the approach adopted by South Worcestershire.</p> <p>The Birmingham Development Plan acknowledges a shortfall of 37,900 dwellings and further evidence of a shortfall is emerging in the Black Country. With established migration patterns with WFDC from both these areas, it is logical to conclude that increased supply in WFDC is likely to be met by additional migration from GBBC HMA. The proposed modification to the Telford and Wrekin LP reflect this issue.</p> <p>We would welcome opportunity to discuss this matter under Duty to Cooperate procedure.</p>	<p>Council and the Black Country Local Authorities and will continue to do so during the Local Plan Review process.</p>
Rentplus	LPPO1107	Policy 6A and Development Strategy	Comment	<p>This policy rightly sets a clear annual target for affordable housing, which is fully supported as this sets a clear ambition for the Council to deliver housing to meet local needs. It is important to meet the full range of housing needs in order for the District’s residents to thrive, as encouraged by the recent White Paper. Crucially, that Paper made widening the definition of affordable housing a central theme to planned tweaks to the NPPF and it is this that will need to inform the future direction of the Local Plan Review. Once those changes have been published (as we expect later this year) it will be important to review the evidence base</p>	<p>Support and comments noted.</p>

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				<p>once more to ensure the maximum level of affordable housing can be delivered through an appropriate policy base. In addition to those points referenced at paragraph 6.9, we recommend that a specific mechanism be included in Policy 6A to require specific measures to be taken if housing supply falls below (or rises above) a set point. This should prioritise measures and specific sites (dependent on the preferred option that is chosen for the Development Strategy) that may bring forward a greater supply of housing, and particularly schemes with a high proportion of affordable housing.</p>	
	LPPO496	Policy 6A	Object	<p>Plan states Insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the necessary housing and employment growth required in the plan period.” This only arises if Wyre Forest District need to allow land for developing 6,000 properties, due to the historically low changes to the number of residents in the Wyre Forest District then I do not believe we need this at all.</p>	<p>Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>
Taylor Wimpey West Midlands	LPPO1464	Policy 6A	Comment	<p>Market Housing</p> <p>Wyre Forest District Council has commissioned an objectively assessed needs (OAN)</p>	<p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new</p>

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				<p>Consideration of alternative scenarios and household projections is supported, Over plan period, likely to be contrasting economic cycles. A 14 year period, upon which trends should be replicated, is reasonable.</p> <p>Appropriate to make adjustment for headship rates to provide for households that have not previously formed (due to economic circumstances and low housing supply) to form in the future and not remain constrained.</p> <p>Level of employment growth arising from the long-term demographic scenarios are in excess of what all three employment growth projections generated. Would be useful to provide an analysis on previous annual levels of employment growth to put the new data into context.</p> <p>Amion suggests a dwelling requirement of 300 dwellings per annum, 5,400 dwellings over the plan period. This is near the upper end of the alternative scenarios considered and most comparable to long term trends. The dwelling figure is 32 dwellings per annum short of the scenario, which does not include UPC. Clearly, if ONS has been incorrect by including UPC and migration patterns are higher, there is a risk that the dwelling requirement is insufficient to meet those needs. Whilst it is proposed, as considered below, that an additional 400 dwellings will be added</p>	<p>standardised methodology.</p> <p>WFDC have undertaken a number of Duty to Cooperate meetings with Birmingham City Council and the Black Country Local Authorities and will continue to do so during the Local Plan Review process.</p> <p>The Employment Land Review is also being updated in line with changing guidance in the NPPF / PPG and will use the plan period up to 2036.</p>

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				<p>to the supply to allow for under delivery, if the higher dwelling requirement of 332 is needed as forecasted the excess will be wiped out resulting in a very lean land supply.</p> <p>The OAN evidence is a good baseline assessment of the housing requirements in Wyre Forest, the local planning authority should further consider published economic past trends against those put forward by the independent forecasting houses to determine, which is more accurate. Further work to identify if, in the context of Wyre Forest, it is appropriate or not to include UPC in the projections of the scenarios tested.</p> <p>There is unmet need arising from neighbouring HMAs. There is a shortfall in excess of some 50,000 homes in the Greater Birmingham HMA, which must be provided for. It is important that given the close relationship Wyre Forest has with the nearby authority Dudley (which is in the Greater Birmingham HMA), as evidenced by Figure 2.3 (migration flows) and 2.4 (labour flows), that appropriate provision for the unmet need is made available.</p> <p>Wyre Forest is within the Greater Birmingham & Solihull and Worcestershire Local Enterprise Partnership area. The level of housing provision proposed needs to be consistent with the aspirations of the LEPs. Having reviewed the evidence, it appears</p>	

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				<p>that such economic aspirations have not been tested and it is unclear whether the level of dwelling provision is appropriate to meet those needs. It is suggested that further work is commissioned to test whether the dwelling requirement is fit for purpose and is joined up with other strategies and plans to achieve wider strategic aspirations.</p> <p>Affordable Housing</p> <p>Requirement for 1,620 affordable homes or 90 dwellings per annum, which is 30% of the overall dwelling requirement. When comparing this to the affordable housing need evidence, the 90 dwellings per annum is far less than the 229 dwelling affordable need identified by Table G1 within Appendix G: Affordable Housing Need Calculations within the Amion OAN Report of April 2017. The reason for the reduced policy requirement is potentially due to the fact that affordable housing delivery has been quite poor in previous years (as set out in Table G4) achieving an annual average of 47 dwellings per annum over the last four years. It is advised that in order to ensure the affordable housing requirement is deliverable, affordable housing viability work should be undertaken by the Council.</p> <p>C2/ Institutional/ Care Home</p>	

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				<p>540 bed spaces for C2/ Institutional/ Care Homes categories is supported and will assist to ensure the specific needs of the population are met. The principle of separating the C2/Institutional/Care Home requirement from the C3 requirement is supported, any consideration of housing land supply position contained within the housing trajectory should also exclude the C2 provision.</p> <p>Employment Land</p> <p>The 40ha requirement of employment land is informed largely by the June 2016 ELS by Lichfields, which notes that the Wyre Forest District economy has been behind regional and national trends in jobs growth over the period 1997-2015. The baseline forecasts, labour supply scenarios and subsequent analysis of past development rates lead the ELS to arrive at employment land requirements up to 2032 of between 31ha and 37ha. The 40ha requirement in the Local Plan looks to be broadly in line with these estimates, given it looks at requirements for a period up to 2034 – two additional years compared to the ELS timeframe. This analysis all seems logical and is a fair reflection of what future land demand could look like in Wyre Forest if past trends continue.</p> <p>A concern with the 40ha employment land requirement is that it does not appear to take into</p>	

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				<p>account what could be needed if Wyre Forest District saw stronger economic growth under a “policy -on” scenario. Such a scenario is discussed in the ELS, which specifically mentions the importance of the Hoo Brook Link Road Phase 2 project and the impact this will have on employment land requirements in the District. The resulting land requirements under this scenario could see Wyre Forest need around 60ha of employment land. By taking the lower figure of 40ha, there is a risk that the economy of Wyre Forest District remains stagnant over the period of the Local Plan and falls behind other parts of the region. For example, the Worcestershire Local Enterprise Partnership’s Strategic Economic Plan has a vision to grow the LEP economy by 25,000 jobs by 2025 and to support growth sectors such as advanced manufacturing. It is unlikely that Wyre Forest District will make much of a contribution to this target if its economy only grows under baseline conditions. Consideration should therefore be given to increasing the quantum of employment land brought forward by the Local Plan.</p> <p>2.23 If employment growth is increased, the level of housing need should be reconsidered accordingly to ensure a jobs balance ratio that ensures a level of self-sufficiency and sustainability.</p>	

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	LPP01981	Policy 6A	Object	<p>Policy 6A - Development needs 2016 - 2034.</p> <p>The amount of dwellings proposed seems to be vastly overestimated when correlated with figures for population projections from the ONS. WFDC state that 5400 dwellings will be required. Taking the ONS average household occupancy of 2.4 people per dwelling, this equates to a population growth of 12960 people between 2019 and 2034. ONS projections indicate that Wyre Forest population will grow from 100,000 in 2019 to 104,000 in 2034. This projected growth of 4000 people equates to a requirement for 1667 dwellings or just 31% of the 5400 stated in the proposal.</p> <p>The Wyre Forest District is effectively stagnant in terms of economic development and population growth and has been for several decades. Therefore the District Council have an obligation to facilitate change in these circumstances, but even if economic regeneration was to lead to a requirement for <u>double</u> the population growth projected by the ONS this would still only require an additional 3300 properties, nowhere near the 5400 anticipated in the proposal.</p> <p>Given that Objective 12 of the SA Framework is "To Maintain the integrity of the Green Belt within the District", all housing requirements could be easily accommodated without encroaching on any Greenbelt</p>	<p>Objection noted.</p> <p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government's new standardised methodology.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				<p>land as proposed under Policy 30. Using your figures from Table 30.0.1 to 35.0.1, and removing all sites that would require removal of the land from Green Belt, 2190 dwellings could be built on identified sites, many more than would be required using the ONS figures of projected population growth. There are also other possible sites within the Wyre Forest District not currently within the Green Belt that could be considered for residential development not identified in the proposal - the current town centre zombie streets of Worcester Street, the lower end of Coventry Street and much of the pedestrianized area being one in particular. No-one would particularly miss either The Swan Centre or Rowland Hill centre. The possibilities for urban regeneration here, combined with green spaces are tremendous.</p> <p>Therefore I object to all proposed residential development on existing Green Belt detailed in sections 30 to 35. Justification 31.1 is also invalid as no development on Green Belt is required.</p> <p>In summary this plan is fundamentally flawed with unrealistic anticipated population growth. The Council need to go back to the drawing board and, using realistic figures based, make a new proposal.</p>	
Summerfield Against Land	LPPO1621	Development	Object	<ul style="list-style-type: none"> If the 2016 OAHN is accepted that would fulfil the combination of the Core need and <i>all</i> the 	The OAHN study published in April 2017 followed the government guidance on OAHNs

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Transformation		Needs		<p>Option B housing requirements for Kidderminster, Stourport and Bewdley i.e. 4572 dwellings</p> <ul style="list-style-type: none"> • We reject the numerical argument that you advance in respect of Option A, especially the transformation of the dwellings requirement from 5,400 to 6,304, which represents a 16.7% increase and is equivalent to a 21-year build. • It is unclear why the annual requirement increased from 254 p.a. in 2016 to 300 p.a. in 2017. Also, to make allowance for sites not coming forward the maximum number of dwellings in Option A rises to 6,304 dwellings or 350 p.a. and Option B to 6,559 or 364 p.a. • We conclude that the 2016 OAHN could be met with very limited use of the Green Belt (Option B) and that the subsequent increase the “critical mass” proposition together with your ‘margin of error’, justifies the use of Green Belt and supports the proposed relief road, especially in Option A. This is overdevelopment on an industrial scale. 	available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.
	LPPO2777	Policy 6A	Object	Assessment of housing needs should be scaled down to the more realistic population growth projection of 5.1%.	Objection noted.
Spennells Against	LPPO1725	Housing Need	Object	The NPPF states that we should consider only future scenarios that could <u>reasonably be expected</u> to occur.	Objection noted.

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Further Expansion				<p>The National Statistics Sub National Population Projections (SNPP) 2014 evidences a growth of population for the outlook period at 4.7%. Using this growth figure the need is 199 dwellings per annum (2985 in total to 2034). This negates the need to take Green Belt land.</p> <p>Even the PG Short Term Data shows an increase of 5.8% which is twice the growth of the last 15 year period and still only has a need for 229 dwellings per annum. We firmly believe that growth figures will be less than 5.8% based on national projections. With the forthcoming government attempts to reduce net immigration, this will bring the figure much closer to the 2.7% experienced over the last 15 years.</p> <p>The Amion Report assumes a much higher rate of population growth than the actual growth over the past 15 years and we believe it is therefore flawed.</p> <p>Increasing the allowance for vacant properties to 4.5% and the vacancy rate by 1.3% means that the housing demand has been unnecessarily increased by 578 dwellings (or 39 per annum).</p> <p>The need for new dwellings in Wyre Forest up to 2034, is realistically around the 3000 number and therefore the need to use any Green Belt land is unnecessary.</p>	<p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.</p>

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				<p>WFDC do not have to accept the OAHN targets for housing, especially if there are large amounts of Green Belt or other protected land. Brighton and Hove, Watford, Hastings and Crawley have recently set housing targets of only half their assessed need.</p>	
Wyre Forest Community Housing	LPP01639	Policy 6 A	Comment	<p>We argue that the standard approach to housing need is somewhat flawed and underestimates the housing need and feel that the conclusion underestimates both demand and need.</p> <p>Table 8.04 clearly describes how unaffordable market sale and market rent solutions are within the District.</p> <p>The numbers for affordable homes seems at odds with the Wyre Forest District Local Plan Review Objective Assessment of Housing Need April 2017, which on page 48 states:</p> <p>“8.11 The analysis undertaken suggests and annual requirement of 229 dwellings per annum to support affordable housing needs requirements.”</p> <p>Our own research based on our Group’s Housing Needs Register, which we maintain on the District Council’s behalf, demonstrates a waiting list of just over 2,100. Of these, some 1,300 have the highest</p>	<p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.</p>

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				“Gold” priority with 64 statutory homeless, 486 homeless or threatened with homeless, and 184 overcrowded (July 2017).	
Taylor Wimpey West Midlands	LPPO2251	Table 6.0.1	Comment	<p>Key concerns :</p> <ul style="list-style-type: none"> • OAN - need to compare published economic past trends with economic forecasts to test appropriateness of requirement • Consider requirement to take some of Greater Birmingham's housing need once work is published in light of close relationship with Dudley • Ensure that C2 institutional requirement is kept separate from land supply calculations • Employment land requirement of 40Ha does not consider a 'policy on' scenario of stronger economic growth as per Worcestershire LEP Strategic Economic Plan • Housing land supply should be increased to allow for 20% buffer in line with LPEG recommendations • Options A and B have both benefits and dis-benefits. Suggest a combination would ensure rolling 5 year supply can be maintained as SUE may not be completed in plan period. Recommend that Plan period is extended or further ADRs proposed around Kidderminster to provide an enduring Green Belt boundary. 	<p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.</p> <p>WFDC have undertaken a number of Duty to Cooperate meetings with Birmingham City Council and the Black Country Local Authorities and will continue to do so during the Local Plan Review process.</p> <p>The Employment Land Review is also being updated in line with changing guidance in the NPPF / PPG and will use the plan period up to 2036.</p>

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				<ul style="list-style-type: none"> Housing policies need to be more flexible to allow new development to reflect local character and needs 	
	LPPO4299	Policy 6A	Comment	We question the need for 5,400 houses up to 2034. Why would that many people want to move into a town such as Kidderminster which seems to have lost its industrial base?	Comment noted. The housing requirement is based on the evidence provided in the OAHN study.
	LPPO4046	Annual requirement	Object	I don't think it is a good idea to build 300 houses a year. I do not approve if this and would like it not to happen. Building of these houses will cause major environmental damage over the up coming years.	Objection noted.
	LPPO4051	Policy 6A	Comment	<p>There are no time lines in terms of site! infra-structure development other than a house building figure of 300/year. Which sites and when? Does the WFDC intend to review the "Final plan" after the 2021 and 2031 census figures are released and modify accordingly?</p> <p>The Local Plan is flawed and the basic needs for Wyre Forest over the next two decades should be reconsidered</p>	The Preferred Options document did include details and maps of the potential site allocations. These sites were consulted on as part of the consultation.
	LPPO4068	Employment Needs	Comment	Easter Park brings another concern. We understand not all units are taken – why is this? Maybe wrong size, shape, position etc. so how is it known what is	Some employment sites are still recovering from the effects of the recession. The success of an employment site is dictated by the

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				required by each potential business – from a one employee one through to possibly a 500+ one. How can such vast requirement be addressed – no doubt by leaving ‘land for industrial building’ untouched for years on end.	climate of the economic market. For the district to be sustainable, it needs both housing and employment sites so people can live and work in the district.
	LPPO4308	Policy 6A	Comment	<p>Quote from Government news:</p> <p>"Getting the right homes built in the right places</p> <p>Consulting on the principle of a new, standardised way of calculating housing demand to reflect current and future housing pressures. Every local area will need to produce a realistic plan and review it at least every 5 years.</p> <p>Currently 40% of local planning authorities do not have an up to date plan that meets the projected growth in households in their area. Fixing this will help make sure enough land is released for new homes to be built in the parts of the country where people want to live and work and ensure developments take heed of local people’s wishes, while continuing with maximum protections for the Green Belt.</p> <p>Councils and developers will also be expected to use land more efficiently by avoiding building homes at low density and building higher where there is a shortage of land and in locations well served by public transport</p>	Comments noted. The NPPF Para 83 states that “Local planning authorities with Green Belts in their areas should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.” As the Council is undertaking a Local Plan Review, it can amend the Green Belt boundaries through this process. This will be tested at examination stage by the Planning Inspector.

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				<p>such as train stations."</p> <p>I do hope you will listen to all the information you receive during the consultation period, especially since your plan does not meet the government guidelines to protect Green Belt.</p>	
	LPPO4461	Development Needs	Comment	<p>It seems that the main thrust behind this Plan is the stated Government requirement for Wyre Forest DC to provide 6000 houses by 2034. If there is any direct evidence for this number in the review then it is not shown clearly. What is clear is that the population of the Wyre Forest District is, and has been, practically static for a number of years. So why does the district require such a large amount of additional housing? Is this something being driven by the GBSLEP? If so why? Would this be accompanied by jobs or would Wyre Forest become a 'dormitory district' with all the attendant problems of a large commuting population.</p>	<p>There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>
	LPPO4442	Development Needs	Comment	<p><u>Housing Needs and Numbers</u></p> <p>I believe that the Council's projections for the population growth of Wyre Forest in the local plan are unrealistic. Over the last 10 years, the population growth has virtually been static and has only risen by approximately 1000, which is below the national average. Our population is also described as "ageing". We do not have the industry to attract younger workers to the area.</p>	<p>The housing need is based on population data which includes births and death rates. It is also based on household projections. As the plan period is for 20 years, there will be an increase in population over this time. Also, there is an increasing elderly population in the district which means people are living longer and therefore staying in their homes for longer. In addition to this, the family unit is changing with more single parent families occurring. This</p>

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					<p>puts pressure on the current housing stock. There simply isn't enough housing to cater for all these different needs over the plan period. In addition to this, people migrate into the area as well as moving out.</p> <p>The emerging plan will also be allocating employment sites. This is so people can live and work in the district, creating a more sustainable place.</p>
	LPPO4637	Housing need	Comment	<p>Finally it seems to me that the new build for Lea Castle is not designed to meet the needs of the local population but that of those further afield who would like to live in a semi rural area but commute to their employment in Birmingham and Worcester. Please understand that commuters bring little to their residential areas, often using eateries and retail outlets either close to their work place or in large retail parks such as Merry Hill.</p> <p>It would be beneficial to the local population if the housing met our needs and also include such organisations as care homes, sheltered housing and hospice to meet the needs of our expanding ageing population.</p>	<p>Comments noted. The proposed site allocations in the emerging Local Plan are to meet the needs of the District in terms of housing and employment. The evidence for this need is shown in the OAHN study and the ELR study – both of which are being revised and updated for the pre-submission plan in light of Government changes to national planning policy.</p>
	LPPO4898	Policy 6A	Comment	<p>Puzzled by the figures used for deciding on the required number of new builds. In 6.8 of the plan it states 'The housing requirement reflected by this plan</p>	<p>The housing need is based on population data which includes births and death rates. It is also based on household projections. As the plan</p>

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				<p>is based solely by that required by the needs of the Wyre Forest.' Given that the population is expected to remain fairly static, and that inward migration is minimal, even allowing for an increase in inward migration, a 12% increase in housing stock seems excessive.</p> <p>I would also question the need to provide more industrial units. There are many vacant plots on the various industrial estates in the district, why free up more land when there is obviously a supply of units and plots of varying size to suffice for years to come.</p>	<p>period is for 20 years, there will be an increase in population over this time. Also, there is an increasing elderly population in the district which means people are living longer and therefore staying in their homes for longer. In addition to this, the family unit is changing with more single parent families occurring. This puts pressure on the current housing stock. There simply isn't enough housing to cater for all these different needs over the plan period. In addition to this, people migrate into the area as well as moving out.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p> <p>With regards to the employment land, the Council is also updating the Employment Land review study. There is a legal requirement for the Council to provide for its employment need as well as its housing need. To make a place sustainable it needs employment as well as housing. By creating employment opportunities it enables people to live and</p>

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					work within the district.
	LPPO407	Locating development	Comment	<p>Not convinced that any green field sites need to be developed to provide the dwellings that you say will be needed. There appears to be a massive brownfield site that has not been considered at all. This is pretty well the whole of Kidderminster Town Centre. It is a ghost town during the evening. A huge proportion of the shop premises are empty. There is a very significant number of charity shops - these appear to help to freeze out proper businesses that have to pay their staff proper wages, pay for their new stock etc.</p> <p>European town centres in the evenings are full of people going about normal activities and this leads to a feeling of safety and enjoyment. The reason for this is that there is housing in the town centres. All the shops have apartments above them.</p> <p>We have been told that there is nothing that the council can do to encourage property owners to convert some or all of their premises into living accommodation. I cannot believe that it is in anyone's</p>	Comments noted. Housing provision in the town centre is being considered as part of the Local Plan Review process. We also have an emerging Policy on housing for older people.

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				interest to keep all these shops empty and some pressure points should be sought.	
Gemini Properties	LPP01192	Policy 6B	Object	Generally support criteria identified but feel additional ones are required. In order for sites to be allocated for development they should be "deliverable" - be available now, offer a suitable location of development now and be available with a realistic prospect that development will take place. The proposed location should be market facing and clear evidence should be available that the housing allocations are suitable and achievable during the course of the plan period.	Objection noted. This is already covered by the NPPF so no need to add it to the policy wording in Policy 6B.
Stourport on Severn Civic Society	LPP01296	Policy 6B	Comment	In relation to Stourport-on-Severn: Development on the Green Belt should be minimal and brown field sites fully optimised. It is essential to retain the character of the town and its separate identity. Further development on the edges of the town would cause deterioration of a valuable landscape as well as a loss of worked farming land.	Comments noted.
Chaddesley Corbett Parish Council	LPP01035	Policy 6B	Support	We support this segmentation of locations for any new developments.	Support is noted.
Persimmon	LPP01427	Policy	Comment	Support aspirations of Policy 6B in terms of its	Comments noted. Agree that employment

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Homes Limited		6B		<p>approach to the location of new development.</p> <p>Concerned that the proposed approach to distributing development in Policy 6B is not reflected by allocations included within the emerging Plan.</p> <p>A number of proposed allocations are on existing employment land. Employment sites should not be allocated for residential development unless there is clear market evidence presented to demonstrate that the sites will not come forward for an employment purpose.</p> <p>We support the recognition that it is necessary to facilitate the delivery of sufficient accessible housing to meet objectively assessed needs. Necessary to ensure that proposed housing sites are in suitable and deliverable locations.</p>	<p>sites should not be allocated for housing where possible, but these particular sites had remained unused for a long period of time. As they were brownfield sites suitable for housing development they needed to come forward for housing. The NPPF Para 22 states: “Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed.”</p>
Gladman Developments Limited	LPP01342	Policy 6B	Comment	<p>Gladman welcomes commitment to facilitate development to meet OAN but this should be at least the minimum requirement. <i>Aii</i> refers to delivery of 'sufficient' housing. This should be removed. Housing requirement should be based on assessment of need that fully reflect housing market area and requirements of NPPF/NPPG.</p> <p>Aiv- strategy should consider and seek to recognise the intrinsic character and beauty of the countryside in line</p>	<p>Comments noted.</p>

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				<p>with the core planning principles of NPPF rather than seeking to safeguard such areas.</p> <p>Avi - urban focus of plan broadly reflects services and facilities provision. However, market towns and rural centres are also sustainable locations where development should be promoted inline with NPPF. This will help to maintain vitality of rural communities.</p> <p>C - neighbourhood plans will need to be consistent with Local Plan as a whole and have a role to play in supporting district in meeting development needs in full.</p> <p>D - open countryside is defined as land beyond a development boundary where development should be strictly controlled. However, this is not consistent with presumption in favour of sustainable development and would restrict development coming forward on edge of settlements. The policy approach taken through the Plan should more closely follow the Framework’s emphasis on the need to recognise the intrinsic nature and beauty of the countryside as part of the wider consideration of sustainability (alongside other core planning principles), rather than an out of date approach of protecting the countryside for its own sake.</p> <p>Bewdley - is highly sustainable and offers wide range</p>	

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				<p>of services as well as being close to Kidderminster's services and employment opportunities. Current plan seeks to deliver 10% of overall housing requirement to Bewdley. No explanation in emerging plan as to how housing has been allocated. No justification for level of Green Belt land proposed for release in Bewdley and whether this is enough to meet needs. Policy 6B seeks to meet local needs in Bewdley but proposed allocations would not do this. Bewdley Housing Study Report says affordable housing requirement over plan period will total 383 dwellings, whilst proposed allocations only total 251 dwellings. If the Local Plan fails to tackle affordable housing needs over the plan period current housing inequalities will get even worse for the next generation.</p>	
Persimmon Homes Limited	LPP01585	Policy 6B	Comment	<p>Bewdley is named as a Market Town and is third in the settlement hierarchy, there appears to be a negative stance within the Plan for development within this area, being described as a settlement with “fewer services”. However, as Bewdley is named as a Market Town the Plan should be more positively worded in order to encourage the much needed growth which is required in the area.</p> <p>As the amount of brownfield land available has reduced the Council now needs to look at appropriately located sites so may need to adopt a more flexible approach towards greenfield sites if the</p>	Comments noted.

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				<p>OAN is to be met in full. As Bewdley is third in the settlement hierarchy it is necessary that development is undertaken and encouraged in this area.</p> <p>Within the Wyre Forest Settlement Hierarchy Technical Paper (2009) Bewdley was ranked very similarly to Stourport. Whilst Stourport received a score of 21 Bewdley was awarded a score of 20 which saw Bewdley have many of the same facilities as Stourport. However, whilst Stourport is in line to receive a significant amount of housing, Bewdley has been marginalised for growth. Due to the lack of potential development land within the District it is considered that a fresh approach needs to be taken for development in Bewdley in order to satisfy the local and wider need.</p>	
	LPPO1878	Brownfield sites.	Comment	Run down areas with empty building, develop them such as The old law courts and Glades.	Comments noted. These sites are being considered.
	LPPO2592	Policy 6B	Object	It is very important that every effort is made to use the considerable brownfield sites still available for development before greenfield sites are considered. Developers will always prefer to develop on green field land because it is easier and cheaper. However this is no reason to zone large areas of the Green Belt for housing just for this reason. Are there any existing industrial or retail areas that could be rezoned for high density housing? For example, Worcester Street in	<p>Objection noted.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District.</p>

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				<p>Kidderminster has ceased to become a viable retail zone and could be redeveloped for high density housing instead of poor quality shopping. The Crown House site in central Kidderminster could also be similarly rezoned for high density housing. Both these opportunities would go some way to revitalising the Town Centre especially at night and would be highly sustainable close to transport and other facilities.</p> <p>If Green Belt land is required for housing I reluctantly accept that land east of Kidderminster may be the best option as it is the closest to transport links to the economic hub of the West Midlands conurbation where most economic activity takes place. Locating development here will mitigate further traffic growth through Kidderminster. However, I feel that it is disingenuous to attempt to sell the Council’s preferred options for housing development on the basis that they will fund a by pass for Kidderminster. The proposed road through the development is not a by pass but a single carriageway 40mph (at most) access road to the new development. What is really needed is a rejuvenation of previous proposals for a proper dual carriageway by pass starting from the Bewdley by pass and running south of Kidderminster and Blakedown to reach the A456/A491 island at Hagley. This would hugely improve access to Wyre Forest district and therefore the economic performance of the area.</p>	<p>We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>Transport modelling work is being undertaken to inform the final site allocations. This evidence based work will be made available at pre-submission consultation stage for public viewing on our website.</p>

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	LPPO3216	6B Greenbelt	Object	<p>We DO NOT support development on existing Green Belt land when there are other options</p> <p>The Conservative party election manifesto promised "We will protect the Green Belt. We will ensure that brownfield land is used as much as possible for new development" How can this 'promise' be reconciled by Wyre Forest District Council's ruling Conservative Party? Yes, we need new housing to provide for our young people and people trying to get onto the property ladder - but NOT by decimating our Green Belt.</p> <p>The 'Call for Sites' - 'easy money' offered by developers to get their hands on Green Belt land.</p> <p>We urge Wyre Forest District Councillors to take on board the concerns.</p> <p>We appreciate that difficult decisions have to be made, but ask for you to balance such decisions with realistic future needs - development MUST only take place in the RIGHT places and Green Belt countryside should be a very last resort.</p> <p>Predictions for future growth are just that - no-one knows how demand for new housing will develop - will we see sprawling row upon row of empty or</p>	<p>Objection noted.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				ugly homes.	
	LPPO3587	Policy 6B - Locating new development	Object	<p>Has the council thoroughly checked that brownfield sites have been identified and that these be used for development and that instead of offering green belt land to developers.</p> <p>Grade A agricultural land or any agricultural land and green belt, must never be built on, this land is very productive and employs many people during and before harvest, consider food miles and sustainability.</p> <p>Wild life will also suffer at the loss of their habitat.</p>	<p>Objection noted.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>
	LPPO3655	Policy 6B	Object	<ul style="list-style-type: none"> Green Belt, though not sacrosanct, is there for good reason – creeping urbanisation from the Birmingham conurbation only makes sense in <u>exceptional</u> circumstances. A requirement of the Local Plan is that development should be proportionate to the capacity of the district. The potential for around 4000 dwellings being built along this eastern corridor is surely disproportionate? 	<p>Objection noted.</p> <p>Comments noted. The housing requirement is based on the Objectively Assessed Housing Need (OAHN) study. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>The emerging Local Plan does include policies</p>

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				<ul style="list-style-type: none"> The Provisional Local Plan states that there is virtually static population growth due to an ageing population and a higher proportion of residents being over 65. As well as a requirement for more care home places surely there is a need to look at the likely housing needs of an ageing population. Many may be looking to live near to amenities in the town centre – close to shops, transport etc. and not on housing estates on the periphery. Movement to the town centre would free up family homes and reduce the need for more ‘housing estate’ type of new builds. Young people coming into the area to work would also be attracted to town centre living with all facilities on their doorstep e.g. affordable housing in the form of town centre apartment 	<p>for affordable housing and will also look to provide a mix of housing types to cater for the needs of the community, i.e. 2 bed, 3 bed, 4 bed family homes. There will also be a C2 use requirement to cater for the needs of the elderly population.</p>
	LPPO2916	Policy 6B	Comment	<p>Empty properties in Green Street and Worcester Street could be turned into apartments to provide affordable housing.</p> <p>The town needs to be regenerated to attract people to live in the area. There are a lot of empty shops and unemployment in the area.</p>	<p>Comments noted. Brownfield sites have been considered as part of the plan process – the site next to Tesco in Stourport is included in the Plan (AKR/20 – Carpets of Worth, and AKR/2 – Cheapside). The Sladen School (BW/3) site is also included.</p> <p>The council works with Empty Property owners</p>

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				<p>Also there is the old Sladen school site could also provide housing.</p> <p>The old Sarsons vinegar site could be used for housing as the road network is there and it is close to local amenities.</p>	<p>who want to bring properties back into use and would support conversion of units where it is appropriate to do so.</p>
	LPPO3366	Policy 6B	Object	<p>The green belt plays a vital job in separating the town from the W.M conurbation. This land is highly regarded locally, as it supports much wildlife, birds, mammals and invertebrates including endangered species, hedgehog, skylarks etc. The impact on the habitat the impactand on the buffer zones for Hurcott and Podmore SSI's would be very damaging.</p> <p>Because we are a small town is doesn't mean that we need to spread so far into large areas of green belt. Open countryside is important to everyone, wildlife and the existing population. These areas are the green lung to eastern Worcestershire.</p>	<p>Objection noted.</p>
	LPPO4126	6B	Object	<p>Any development to the west of the river Severn would carry such massive infrastructure costs.</p> <p>Creating approx 1000 new homes to the west of Stourport, must inevitably require a new Severn crossing. Currently going from the west, crossing the river at Stourport can easily take 30 minutes.</p> <p>The schools, Doctors and other requirements, must</p>	<p>Objection and comments noted.</p>

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				<p>surely make the whole concept run into many Millions.</p> <p>Increasing traffic would make the situation far, far worse.</p> <p>Population levels in Wyre Forest are below the national average. The same is true of housing stock, where prices have struggled to get near the national average increases over the past few years.</p>	
	LPPO3579	Green Belt	Object	I would like to raise an objection to the use of green belt sites to build houses as there is insufficient jobs to sustain the number of people, and insufficient infrastructure to support them.	Objection noted.
	LPPO4133	6B	Comment	<p>We are mystified by the total lack of explanation of the total failure to look into and comment on why the proposals have not included any land whatsoever to the north, south or the west of the town. Not bothering to mention these areas and the reasons for the omission shows a complete lack of regard for the electorate.</p> <p>Our initial comment is that developing towards Hartlebury would present no danger of linking the village to Kidderminster, this is certainly not the case with extending the town towards Blakedown and thence to Hagley.</p> <p>This is also clearly not a problem with extending</p>	Comments noted. Sustainable locations are sought when identifying site allocations in the emerging Local Plan. The site selection process is informed by a number of evidence base documents, which include the HELAA, Employment Land Review, Strategic Flood Risk Assessment, and the Green Belt study to name but a few. The Local Plan Review is also informed by the Sustainability Appraisal. A Site Selection Paper will also be published at pre-submission stage – this paper gives further details as to why some sites have been chosen as opposed to other sites.

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				towards Bridgnorth. This begs the question as to why one quarter of the town must bear the whole impact, whilst three quarters, with less danger of negative impact, are not even looked at.	
Anonymous	LPPO5093	6B - Locating new development	Comment	<p>It would be naive to believe Kidderminster, Stourport & Bewdley will not be forced at some point to build on Green Belt. I believe it would be constructive is to engage with Wyre Forest District Council about how the Green Belt land is developed in a more sensitive and thought through manner (i.e. not another Spennells stuck on the edge of the community increasing the already present traffic issues and meaning the location of existing services need to be moved rather than improved).</p> <p>See response LPPO5094 re types of dwellings – that could be spread out in more of a lane fashion retaining adjacent fields to be used for cycling, dog walking and the general enjoyment of the whole community. In terms of traffic, the lanes should access more than one major road. The hope would also be that the majority of target residents (65+) would not add to the existing morning commute traffic issues in the area as they are already retired, or over the next decade, would be reaching retirement age. This is not to say traffic would not increase in general, hence the reason for providing many routes to the major roads already in place.</p>	Comments noted.
Worcestershi	LPPO1085	Site	Comment	With regards the specific sites proposed for allocation,	Comments noted and welcomed. We look

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re County Council, Planning Economy & Performance		allocations policy - Policy 6B		<p>we are concerned that we have been unable to identify a background evidence base or work to consider these sites in relation to green infrastructure or its constituent elements of landscape assessment, biodiversity, blue infrastructure or historic environment, whether individually or holistically. It is therefore difficult to assess the potential for the sites individually or collectively to deliver sustainable development or for the plan to meet the requirement of NPPF paragraphs 109 and 110.</p> <p>We recommend that ecological site assessment should be undertaken as early as possible in the planning process, prior to site allocation, and should be used to inform both the final site allocation and to develop a comprehensive and holistic approach to consideration of the impacts of the proposed development. The Worcestershire Green Infrastructure Partnership would welcome the opportunity to work with WFDC to develop a green infrastructure approach to site allocations within the plan, including desk based assessment and to discuss more detailed site assessment as appropriate.</p> <p>With regards to green infrastructure we support neither option A or B, but instead a hybrid approach which removes from the final allocation those sites which have significant environmental constraints upon deliverability. This should be informed by further work</p>	forward to working with WCC on this suggested approach.

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				<p>including desk based assessment. The final allocation should cohesively treat the remaining sites in a manner which will facilitate the sustainable development aspirations as set out within the Plan's vision for the area.</p> <p>We'd suggest this maximises the development quanta via the key strategic areas of: the East Kidderminster Corridor (including Option B); Urban Kidderminster and Stourport; the Kidderminster and Stourport Waterfront Sites; and the larger Lea Castle Complex (Options B).</p> <p>In order to realise the quanta of development within such a 'hybrid' approach, it will be necessary to cohesively treat groups of sites which naturally sit together. The advantages of this approach go beyond securing an ecologically functional landscape and would facilitate a quanta of growth required to trigger essential accompanying infrastructure as advocated by the Worcestershire Green Infrastructure Partnership.</p> <p>This approach would work well if each cohesive 'cluster' of allocations were supported by tailored Green Infrastructure Concept Plans designed to maximise the environmental benefits for each group of allocations. Additionally, this would help achieve the aspirations of Policy 14.</p>	
Stourport	LPPO1130	Policy	Comment	Support a number of the aspirations of Policy 6B in	Comments noted. Agree that employment

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High School		6B Locatin g New Develo pment		<p>terms of its approach to the location of new development. However, concerned that the proposed approach to distributing development outlined by Policy 6B is not reflected by the allocations included within the emerging Plan.</p> <p>A number of the proposed allocations are on existing employment land. It is our view that employment sites should not be allocated for residential development unless there is clear market evidence presented to demonstrate that the sites will not come forward for an employment purpose.</p> <p>Support the recognition that it is necessary to facilitate the delivery of sufficient accessible housing to meet objectively assessed needs. As part of this, it is necessary to ensure that the proposed housing sites are in suitable and deliverable locations. In addition, if the housing requirement is to be met, it must be ensured that there is a sufficient variety of sites available to meet the needs of the market. Concerned that the Kidderminster allocations in particular will result in a market saturation on the eastern edge of Kidderminster. Such a significant amount of development in this location will not be deliverable during the course of the plan period as the market will not support the delivery rates required. Furthermore, housing should be distributed so that it reflects the settlement hierarchy..</p>	<p>sites should not be allocated for housing where possible, but these particular sites had remained unused for a long period of time. As they were brownfield sites suitable for housing development they needed to come forward for housing. The NPPF Para 22 states: “Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed.”</p>

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Worcestershire County Council, Planning Economy & Performance	LPPO1133	Policy 6B - Locating New Development	Comment	The Worcestershire Archive and Archaeology service has no specific comments regarding the site allocations. A brief examination of the proposed allocations against the Worcestershire Historic Environment Record suggests that none of the proposed allocations would directly impact upon a designated heritage asset. On this basis any issues regarding the presence/absence of any undesignated heritage assets of archaeological interest, and any design or mitigation works that may be required as a consequence, could be dealt with as part of the normal planning and development process.	Comments noted. A Heritage Impact Assessment evidence base study has been produced to inform the pre-submission plan and will be published for the pre-submission consultation.
Kidderminster Civic Society	LPPO1166	Policy 6B - re-use of brownfield	Support	Supports the re-use of brownfield sites, thus reducing the need to use Green Belt.	Support is noted.
Kidderminster Civic Society	LPPO1167	Policy 6B - Locating New Development	Comment	Suggest that the new housing requirements would best be distributed over the three towns and outer areas.	Comments noted.
Wyre Forest District Council - Development	LPPO1204	Policy 6B	Comment	Within table 6.0.2, under both Kidderminster & Stourport there is a bullet point that simply reads "Utilisation of appropriate brownfield and greenfield sites". Does this require further clarification, as this	Comment noted. This will be considered in policy update.

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t Control				implies that any development (housing/commercial/retail) might be appropriate.	
Taylor Wimpey West Midlands	LPPO1468	Policy 6B	Comment	<p>The principles, upon which the Development Strategy is based are sound. The principles align to the delivery of the overarching Vision and the Plan’s Aim and Objectives, ensuring the delivery of homes, jobs and focusing development to the most accessible locations whilst having regard to the provision of infrastructure.</p> <p>Kidderminster is identified as the ‘Main Town’ within the District. As the highest order settlement within the District, its role as the administrative centre of the District and focus for public services and employment is supported.</p>	Comments noted.
Hurcott Village Management Committee	LPPO1630	Policy 6B - Locating New Development	Comment	A requirement of the Local Plan is that development should be proportionate to the capacity of the district. The potential for around 4000 dwellings being built along this eastern corridor is surely disproportionate when compared to the required 5100 homes predicted requirement for 2034?	The NPPF Para 6 states: “The purpose of the planning system is to contribute to the achievement of sustainable development.” There are three dimensions to sustainable development: an economic role, a social role, and an environmental role. As Kidderminster is the main town for the District and is served by a railway station with trains running to Worcester, Birmingham and London, it is considered to be the most sustainable location for future development.
Wyre Forest Community	LPPO1647	Policy 6B	Support	We support the principles set out in the policy, but emphasise the need to bring forward schemes in	Support is noted.

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Housing				villages and rural areas. This would support us to be more proactive in meeting the rural housing needs across the District.	
	LPPO1941	Brownfield Use	Comment	Please use brown building sites first even if they are more difficult and expensive to develop. Is it possible to use sites such as Lea Castle, Sladen School, Crown House, and the site of the old swimming pool? Also use fill-in sites for smaller pockets of development that have less impact on surrounding areas.	Comments noted.
Victoria Carpets	LPPO1499	Policy 6B	Comment	The principles underpinning the development strategy and the site allocations in the emerging Plan are in accordance with the NPPF in relation to supporting economic development, creation of accessible housing and effective provision of infrastructure.	Comments noted.
Stanmore Properties Ltd	LPPO1505	Policy 6B	Comment	<p>Kidderminster as focus for development is supported. Kidderminster has the greatest housing need, easy access to the most extensive range of services and facilities and the provision of infrastructure and cost of public service delivery is low. In addition, Kidderminster is well connected by public transport, notably train, to higher order settlements of the conurbation.</p> <p>Growth should be focused in the most sustainable locations in accordance with the Core Planning Principles set out in paragraph 17 of the NPPF. This</p>	Comments noted.

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				<p>supports:</p> <ul style="list-style-type: none"> • the transition to a low carbon future, taking account of flood risk, encouraging the reuse of existing resources; • encouraging the effective use of land that has been previously developed; • actively managing patterns of growth to make fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. <p>The main towns, particularly Kidderminster offer the most sustainable option for growth.</p>	
Offmore Comberton Action Group - Local Plans	LPP01569	Policy 6B	Comment	Whatever final sites are decided we believe that NO land should be released from the existing confirmed Green Belt (i.e. excluding previous ADR sites) until ALL Brown Field sites have been developed.	Comments noted.
Summerfield Against Land Transformation	LPP01612	Policy 6B	Comment	<p>We reject the hierarchy of settlement argument as unfair and disproportionate, a fairer and more imaginative approach is required.</p> <p>The plan contains many underlying assumptions which we challenge. The settlement hierarchy has face validity in terms of population distribution but your proposals result in some 77% (Option A) or 61% (Option B) of the proposed housing development</p>	Comments noted. Sustainable locations are sought when identifying site allocations in the emerging Local Plan. The site selection process is informed by a number of evidence base documents, which include the HELAA, Employment Land Review, Strategic Flood Risk Assessment, and the Green Belt study to name but a few. The Local Plan Review is also informed by the Sustainability Appraisal. A Site

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				falling upon Kidderminster and its environs. This is an unfair distribution and undue burden on the population. This approach is further justified by the limitations imposed by the rivers and canal that flow through the District. Whilst these features do pose challenges to development they do not, in our view, exclude development, or, justify the scale and distribution of development you propose in Option A.	Selection Paper will also be published at pre-submission stage – this paper gives further details as to why some sites have been chosen as opposed to other sites.
Taylor Wimpey West Midlands	LPP01716	Policy 6B	Comment	<p>The principles, upon which the Development Strategy is based are sound. The principles align to the delivery of the overarching Vision and the Plan’s Aim and Objectives, ensuring the delivery of homes, jobs and focusing development to the most accessible locations whilst having regard to the provision of infrastructure.</p> <p>Stourport-on-Severn (including Areley Kings) is identified as a ‘Large Market Town’ within the District. As the second highest order settlement within the District, its role in supporting the provision of large scale housing is supported.</p>	Comments noted.
Spennells Against Further Expansion	LPP01738	Policy 6B - Locating new development	Object	<p>When using the SNNP figures of 199 p.a. there is sufficient brownfield land (including previously developed land at Lea Castle) and Greenfield land available to meet the 15 year land supply (2985) without the need to use Green Belt at all.</p> <p>Kidderminster town centre has at least 40 large shops and office blocks that stand empty, some for well over</p>	It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield

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				<p>a decade. Compulsory Purchase Orders should be made on some of the larger shops that stand no chance of ever being filled due to their size. There are also sites at Sladen School and Sion Hill School. Why are there plans for a cinema on the old Glades site when WFDC claim that land for housing is the priority.</p> <p>WFDC could request Government action in order to encourage Developers in the local area who have been given planning permission to build houses within a reasonable time frame, not just to sit upon Land Banks for speculative purposes e.g. Cheapside in Stourport (AKR/2) and Sladen School.</p> <p>Stourport also has a number of brownfield sites which are in need of development. The now defunct Wyre Forest golf course has released some land and there is no reason why the rest should not be released for housing development.</p> <p>Brownfield regeneration MUST take priority over the development of Green Belt. We contest that there is any need to build on Green Belt within the next 15 years of the plan, and therefore no Green Belt review or land (except Lea Castle) is required for housing.</p>	<p>sites to be able to meet our housing requirements. This will include some greenfields sites within the Green Belt.</p> <p>The sites referred to have already been considered and suggested as potential allocation sites in the emerging Local Plan, i.e. Sladen School site (BW/3), Sion Hill School site (WFR/WC/18), Cheapside (AKR/2) and Carpets of Worth (AKR/20).</p>
	LPPO1854	Policy 6B Brownf	Comment	Consider brownfield sites like large building in the town centre rear of Matalan that has been empty for years before greenbelt land is used	Comments noted.

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		ield Sites			
	LPPO1912	Brownfield sites	Comment	There are Brown field sites available which could cater for a more accurate assessment of the real housing needs plus Kidderminster town centre has empty shops/offices/building which could provide the required need.	Comments noted.
	LPPO1948	Development	Comment	<p>Many people will object on the important ecological grounds. Everyone talks about global warming and we talk about destroying the countryside. It seems like a ploy to get funding for an eastern bypass, with no thought to wildlife.</p> <p>My major concern relates to the amount of traffic on the A456 to Birmingham. If you currently travel at rush hour, you will understand the problem. Not understanding means that your alternative will be to do so before confirmation of the options is completed.</p> <p>The irony of the whole situation is that we are not allowed to have a mobile phone mast at the bottom end of Offmore Farm, but you can contemplate these measures.</p> <p>School places are already under pressure. Appointments with the doctors, likewise. Fire services are down to a minimum and parking is already at a</p>	Comments noted. Transport modelling is being undertaken to help inform the site selection for the pre-submission version of the emerging Local Plan. The Infrastructure Delivery Plan (IDP) is also being produced alongside the Local Plan. The IDP sets out the infrastructure requirements for the emerging Local Plan.

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				premium. Sounds like a well thought out plan.	
	LPPO3320	Policy 6B	Comment	Removal of potential employment sites will add to the significant loss of employment through out the area. Stourport has had no improvements in infrastructure despite the current increase in population of in excess of 10% including both sides of the river. These proposals will increase the population by a further 10% over current numbers still with no infrastructure improvements. It will become a dormitory town with no access to major roads, railway or dependable bus services. The whole area will become a point from which people will travel elsewhere for work.	An Employment Land Review study has been undertaken to inform the Local Plan. Transport Modelling is also being undertaken to inform the final site allocations. This evidence based work will be made available at pre-submission consultation stage for public viewing on our website. The Infrastructure Delivery Plan (IDP) is also being produced alongside the Local Plan. The IDP sets out the infrastructure requirements for the emerging Local Plan.
	LPPO3443	Locating new development	Object	Building all of these houses will cause major environmental damage over the upcoming years. Some of the sites proposed are very near SSSI's (sites of scientific and special interest e.g. sites near Hurcott). They will also be threats to public rights of way. Adding more people to the communities will push GP surgeries.	Objection noted. The Infrastructure Delivery Plan (IDP) is also being produced alongside the Local Plan. The IDP sets out the infrastructure requirements for the emerging Local Plan.

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				<p>Schools are at full capacity.</p> <p>It will strip us of our near countryside.</p>	
	LPPO2420	Policy 6B	Object	<p>Can I please register my objection to the proposed planning local plan review on the following basis;</p> <p>1/ Building on a greenfield site is nothing short of environmental destruction. At a time when the UK numbers of wildlife are falling at a dramatic rate, to further add to this growing trend of removing habitat would be a crime to future generations. Once done, there is no going back. If houses need to be built, brownfield sites should be the limit of further intrusion into our beautiful countryside.</p> <p>2/ The area of the Wyre Forest is already suffering from too much traffic and constant delays, to add to this is simply burying one’s head in the sand.</p> <p>3/ This is clearly purely a scheme to make money for the few to the detriment of the most.</p> <p>4/ The services of the area are at breaking point, the time has come to say no more to large scale developments of this kind</p>	<p>Objection noted.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfields sites within the Green Belt.</p> <p>The sites that were considered as part of the Local Plan Review process can be found in the Housing & Economic Land Availability Assessment (HELAA) document. The Site Selection Paper also provides detail on the process taken.</p> <p>Transport modelling is being undertaken to help inform the site selection for the pre-</p>

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				<p>5/ One of the key strengths of the area is of its outstanding natural beauty, why would you wish to take away what we have?</p> <p>6/ The residents of Wyre Forest are speaking, they do not want this. You are here to serve the wishes of the electorate.</p> <p>I have the following questions that do not appear to be in the public domain;</p> <ul style="list-style-type: none"> • Exactly where were the brownfield locations that were considered and rejected? Is the commercial value of the proposed land development the main driver behind these plans. Presumably there will be considerable profit to build on these sites, please advise the figures and individuals who will benefit from these proposals. • It is clear to all that the existing infrastructure cannot support the current demand. Kidderminster, Stourport and Bewdley roads are often grid locked and burdened with too much demand. These problems should be resolved and increased for further demand before even more strain is even considered. To suggest an eastern relief road will not only ease the existing problems but accommodate further traffic is laughable. What are the short, 	<p>submission version of the emerging Local Plan. The Infrastructure Delivery Plan (IDP) is also being produced alongside the Local Plan. The IDP sets out the infrastructure requirements for the emerging Local Plan.</p> <p>Ecological appraisals and Green Infrastructure Concept Plans have been prepared to inform the pre-submission Plan. There are also GI policies within the emerging Local Plan.</p>

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				<p>medium and long term plans to solve the traffic issues of the district?</p> <ul style="list-style-type: none"> • Schools, hospitals etc are also at breaking point. The plan appears just to add more burden in order to tick a Government housing requirement box. • What plans are there in place to support, improve and protect the local environment? In the last 40 years plus, wildlife numbers have nose dived, habitat lost and there are now more red listed wildlife species then ever before. What is being done to halt this decline and reverse it? • What plans are in place for future housing developments? Bird boxes should be required to be built into the brick, corridors of hedgerow for wildlife movement incorporated into the plans. Trees / ponds, meadows and fruit bearing shrubs should all be required to be incorporated into any developments. The answer that this cannot be afforded is wrong, it is in fact that we cannot afford not to reverse the trends and errors of the past. What plans for new trees to be planted, areas restored for wildlife? <p>You need to plan for today, tomorrow and the next 50 years. The plan appears to be for today and then lumber the problems this creates onto future</p>	

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				<p>generations.</p> <p>Solve the current problems first and then plan to benefit all (including our natural environment).</p> <p>You have an opportunity to lead, don't follow the past and repeat the same mistakes. I see no vision for the next 30-50 years.</p> <p>Let's have proper visibility, no smoke and mirrors. We require honesty, clarity and true long term planning.</p>	
	LPPO2604	Locating new development	Comment	<p>When deciding where to build the new houses, special regard should be taken of the social and employment needs of the people who will be living in the new houses and these fall into two categories.</p> <p>Category one: those people who choose to live in the Wyre Forest but their employment is within the surrounding towns and cities.</p> <p>Category two: those who do not work, or choose to walk, cycle or use public transport to get to work.</p> <p>For those who fall into category one, and we believe this is the vast majority of the adult population, it is essential that their houses are built within easy access of the major arterial roads of the A449 (North), A451, A456, A448, A442 and the A449 (South). It is</p>	<p>Comments noted. Transport modelling work is being undertaken to inform the final site allocations. This evidence based work will be made available at pre-submission consultation stage for public viewing on our website.</p>

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				essential that they are not built in areas that will cause extra traffic to be routed through the known major congestion areas of the Wyre Forest, such as Stourport: Gilgal/Mitton Street, Burlish Crossing, Vale Road and Kidderminster: Foley Park and Bewdley Hill.	
	LPPO3380	Policy 6B	Object	<p>The green belt land plays a vital role in separating the town from the West Mids conurbation, it is home to many bird/animal and invertebrate species, including endangered and priority species: hedgehog, small tortoise shell butterflies, skylarks, corn bunting, house and town sparrows, starlings to name a few. The impact on wildlife habitats on the buffer zones for Hurcott and Podmore SSIs would be tremendously damaging in a time when we are trying to maintain and increase wild habitat recovery.</p> <p>Sir David Attenborough, who wrote the foreword to the State of Nature report, said: “The natural world is in serious trouble and it needs our help as never before. We continue to lose the precious wildlife that enriches our lives and is essential to the health and well-being of those who live in the UK.” I believe these proposals negate this.</p>	Objection noted.
	LPPO4050	Locating development	Object	The allocation of housing in the two “preferred options” provide Stourport with a choice of either a 10% (Option A) or 20% (Option B) rise in population by 2034 — some choice! Whereas the equivalent figures for Kidderminster are 8% & 7% and for Bewdley 5% &	Objection noted. As the District’s strategic centre and the largest town within the district, it is the most sustainable location for future housing growth.

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				<p>8%.</p> <p>The overall figures for Wyre Forest are under 6% for both Options. This is a totally unfair allocation and would result in infra-structure problems in Stourport where the current roads and bridge are already over stressed.</p>	
	<p>LPPO4194</p>	<p>Planning decisions/options</p>	<p>Comment</p>	<p>Planning decisions/options should be informed by the following principles, a number of which I recognise are implicit if not explicit in the options you offer:</p> <ul style="list-style-type: none"> • The individuality/personality of the three towns in the District must be sustained and protected. • The existing and in some cases already diminishing/threatened/remaining open space between the must be protected. • No greenfield sites should be considered/built on when brownfield/derelict sites are still available (e.g Power Station land adjacent to Tescos in Stourport, Timber Yard by canal in Kidderminster, Workhouse site, part of Dog Lane site in Bewdley etc.) • Empty/underused retail spaces in centre of towns should be converted into housing. • The capacity of Kidderminster to support additional housing/population e.g in relation to availability of brownfield sites/proximity to often underused and therefore vulnerable 	<p>Comments noted. Brownfield sites have been considered as part of the plan process – the site next to Tesco in Stourport is included in the Plan (AKR/20 – Carpets of Worth, and AKR/2 – Cheapside). The Timber yard site in Kidderminster is also included (BHS/16 – Timber Yard).</p> <p>The council works with Empty Property owners who want to bring properties back into use and would support conversion of units where it is appropriate to do so.</p>

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				retail capacity and main line rail links is greater than that of the other two towns. Keeping additional housing close to existing transport and underused retail capacity would also reduce pollution/traffic congestion across the Wyre Forest District.	
	LPPO4471	Churchill and Blakedown	Comment	No sites in Churchill & Blakedown were put forward in the Call for Sites. The Churchill & Blakedown Neighbourhood Plan only provides for small scale housing to meet identified local need.	Comments noted.
	LPPO4746	Policy 6B	Comment	This consultation has not been in my opinion unbiased or transparent. I do not see why Wolverley, Chaddesley Corbett, Blakedown along with other outlying areas have not been included.	Comments noted.
	LPPO4899	Policy 6B	Comment	It is stated in the plan that there is virtually static population growth, with an ageing population, and a high proportion of residents being over 65. As well as a requirement for more care home places, surely there is a need to look at the likely housing needs of this ageing population, I would suggest that many of these would be looking to live in a town centre, close to shops and transport facilities, and not on housing estates on the periphery. Movement to the town centre would free up homes for families and lessen the	Comments noted. Housing provision in the town centre is being considered as part of the Local Plan Review process. We also have an emerging Policy on housing for older people.

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				need for more 'housing estate' new builds. Likewise young people coming to the area to work would also be attracted to living in a town centre with all facilities on their doorstep. There would obviously be a higher density than that provided on a housing estate, negating the need for committing so much Green Belt land for development.	
	LPPO3712	6C	Comment	COMMENT ON Policy 6C We do not believe there is evidence to support Kidderminster as the 'tourist hub' for the area; Bewdley and Stourport are the tourist attractions in the Wyre Forest.	Agree with these comments. The emerging Local Plan does recognise Bewdley and Stourport as having important tourist attractions also.
Summerfield Against Land Transformation	LPPO1622	Town Centre Regeneration	Support	We support Wyre Forest DC's ambition to develop and regenerate Kidderminster town centre. This is best served by building in and close to the town centre, promoting the use of sites such as The Glades, Crown House and the Park Lane timber yard. This would address housing need, revitalise the town centre and offer opportunity for small businesses.	Support and comments noted. The former Glades site and the Timber yard site are already included as possible site allocations. There are also future plans for Crown House which the Council's Economic Development & Regeneration team are exploring.
Taylor Wimpey West Midlands	LPPO1472	Policy 6C	Support	Kidderminster's role as the strategic centre of the District is supported. As the existing 'centre' for commercial, employment, retail, office and leisure facilities it is the most sustainable location for meeting future housing needs. The reference to sustainable urban extensions to	Support and comments noted.

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				Kidderminster are welcomed and considered necessary to ensure the sustainable growth of the town and to support future commercial and leisure development to support Kidderminster’s role as a strategic centre, promoting the town as a tourism ‘hub’ and assisting in the creation of a diverse evening/night time economy.	
West Midland Safari Park	LPPO1325	Policy 6C	Comment	<p>Generally support the general essence of this policy, particularly in relation to seeking sustainable transport links and infrastructure to promote ease of access to among other places, West Midland Safari Park. However, we object to the policy as currently drafted, and request that it be amended to more closely reflect paragraph 32 of the National Planning Policy Framework.</p> <p>The policy as presently drafted gives rise to the possibility that the transport links and infrastructure will be in part or wholly funded by developer contributions in the absence of a CIL charging schedule. Such an approach should be proportionate to the scale of the impact on the transport network, and the viability of the scheme for which contributions are sought should be a key consideration in the determination of planning applications. The last sentence should therefore be amended as follows: “Where the residual cumulative impacts of development are severe, sustainable transport links and infrastructure to promote ease of access to the</p>	<p>Objection noted.</p> <p>The Infrastructure Delivery Plan (IDP) is also being produced alongside the Local Plan. The IDP sets out the infrastructure requirements for the emerging Local Plan.</p>

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				Wyre Forest, Stourport-on-Severn, Bewdley, West Midlands Safari Park and Kidderminster Railway Station will be sought, where practical and viable.”	
Kidderminster Harriers Football Club	LPPO933	Policy 6C	Comment	Additional text; This includes the provision of supporting facilities such as <u>sports</u> , hotels, conferencing facilities and developments that improve the evening / night time economy and cultural offer of the town.	Comments noted.
Miller Homes	LPPO928	Policy 6C	Support	<p>Support Policy 6C for Kidderminster to be the strategic centre for the District and for Kidderminster’s role in providing a focus for new housing, commercial, employment, retail, office and leisure development to be enhanced, including through the use of sustainable urban extensions.</p> <p>The Local Plan Review Preferred Options consultation document identifies that Wyre Forest District Council (WFDC) considers that <i>“the urban areas of the District have the greatest housing needs and are the locations where the cost of public service delivery is relatively low”</i>¹. Kidderminster is the largest settlement (urban area) in the District and already plays an important role in providing a considerable quantum of retail, leisure and employment uses, along with mainline rail links. It is also noted that the WFDC Settlement Hierarchy Technical Paper proposes that Kidderminster is classified as a Strategic Centre², at the top of the District settlement hierarchy, and accordingly is</p>	Support and comments noted.

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				considered to be the most sustainable settlement in the District3. It is therefore entirely appropriate for Kidderminster to continue to be the focus for the majority of the additional housing growth and other uses required to meet the needs of the District over the next plan period, which in turn will also support the vitality and viability of the town.	
Gladman Developments Limited	LPPO1343	Policy 6C	Support	Gladman support the broad intention for Kidderminster to be a focus for regeneration and new development. However, this should not be at expense of the sustainability of other settlements. It is vital that the delivery expectations across the portfolio of previously developed sites and urban extensions is suitably evidenced in order to support the preparation of a realistic housing trajectory to accompany the Local Plan and demonstrate the availability of a robust housing land supply. Intention to further develop sustainable transport links between Kidderminster / Kidderminster railway station and other settlements such as Stourport and Bewdley is welcomed.	Support and comments noted.
Gemini Properties	LPPO1193	Policy 6C	Comment	generally supportive of policy as it supports growth of Kidderminster as strategic centre and aspires to regenerate sites within and adjacent to the centre. Policy seeks to make Kidderminster a tourism hub and encourage overnight stays. in order to do this, the retail and leisure offer needs to be enhanced. A flexible approach to site development in and around the centre should be taken.	Comments noted.

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	LPPO130	6c	Comment	Supportive of development plans for Kidderminster being linked to improving access to the town centre - links to Paragraph 5.4.iii (making travel easier around the area generally for non car owners) and health improvement. Currently access on foot to the town from the North and East via Blackwell Street, Birmingham Road or Comberton means using subways which feel unsafe, unpleasant and do nothing to promote Kidderminster as a place to visit or work in.	Comments noted.
	LPPO4493	6.19 Kidderminster Town Centre	Comment	<p>Believes that Kidderminster is not an attractive town due to the following reasons:</p> <ul style="list-style-type: none"> • The monstrosity of Crown House together with empty shops, broken windows, broken beer bottles in the street gives the impression of an impoverished slum town. The money spent on opening up Worcester St must be spent on taking Crown House down. Is this building to be left until it is unsafe? • Empty shops will never be occupied by retailers unless large incentives offered by the Council do not encourage visitors. • Town centres will never be what they were 50 years ago. There is nothing in Kidderminster to attract young people to shop, they shop mostly on line and in shopping malls. They are only attracted to pubs and coffee shops. • Depressing grey paving outside the Town Hall 	Comments noted. Kidderminster town is the main town for the District and is a focus for regeneration and new development in the plan.

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				<p>and shared space, is not attractive and does not complement some very nice brick buildings in Vicar St. "record" seats already look as if they have been in situ for the past 30 years!</p> <ul style="list-style-type: none"> • Drunken behaviour throughout the day is intimidating • Empty and broken beer bottles littering pavements; smashed windows • Green Belt land should be there for the health and well being of residents. The nation is becoming more obese, not helped by Councillors and planners agreeing to more "Take Aways" and "Coffee Shops" We should be encouraging private enterprise. • We worry about obesity in the young and pollution but the Council allowed a drive in coffee shop . • The area where the coffee shop and Kentucky Fried Chicken have been built should have been for accommodation 	
Taylor Wimpey West Midlands	LPPO1474	Policy 6D	Support	<p>Urban extensions at Kidderminster are supported as insufficient amount of sustainably located, readily available land within the town, to support the necessary level of development growth to meet the objectively assessed housing and employment needs.</p> <p>Taylor Wimpey has significant land interests within the</p>	Support is noted.

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				proposed 'East of Kidderminster' Urban Extension and would welcome ongoing proactive discussions with the District Council in bringing forward these land interests within the Plan period.	
Stourport High School	LPPO1131	Policy 6D Kidderminster Urban Extensions	Comment	Policy 6D is superfluous as there is a specific policy (Policy 31) that provides guidance on the Kidderminster's proposed urban extensions. Our response to Policy 31 should be read in conjunction with this representation.	Comments noted.
Worcestershire Wildlife Trust	LPPO1032	Policy 6D Kidderminster Urban Extensions	Object	We have significant reservations about Section ii of this policy. There are likely to be considerable adverse ecological impacts associated with the proposed allocations to the east of Kidderminster and additional work to understand these will be required prior to finalising the allocations here. In particular the likely impact of development on designated sites including Hurcott and Podmore Pool Site of Special Scientific Interest (SSSI); Captains and Stanklyn Pools, Spennells Valley and Hoo Brook Local Wildlife Sites (LWS); and species of principle importance listed under Section 41 of the NERC Act 2006, including Corn Bunting, Hornet Robberfly and Tower Mustard, must be fully	Objection noted. Ecological appraisals of sites have since been undertaken to help inform the final site selection process. We have also worked with the Green Infrastructure Partnership who has since prepared a number of Green Infrastructure Concept Plans, including a GI Concept Plan for the eastern corridor area.

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				<p>understood prior to allocation of any of the sites set out in the consultation. So far as we can ascertain no such information has been used in the decision-making process to date and so we are concerned that the allocations may be unsound. Whilst mitigation for some of the biodiversity issues may well be possible it will require land take that is likely to have implications for the net developable area (and accordingly the number of dwellings allocated) set out in the plan. Rigorous consideration of this is essential and we cannot find anything in the evidence base to suggest that this has been undertaken to date.</p> <p>This is a particular problem to the east of Kidderminster because the designated sites in question generally run in an east-west orientation and so the impact of the proposed eastern relief road (shown on the Proposals Map) will be particularly severe unless significant mitigation can be put in place. A clear understanding of the need for the road and the costs associated with mitigation will therefore be important considerations if a meaningful assessment of the two proposed plan options are to be undertaken. Given the high degree of corridor severance likely to be caused by the indicative relief road route we would strongly advocate that it be deleted from the plan and a reduced level of development brought forward in this part of the district. It follows that for this area Option B appears to be the less harmful option but as yet we do</p>	

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				<p>not believe there is sufficient clarity to fully inform that decision. Given the very significant environmental issues likely to arise from the relief road it may be better to seek alternative access arrangements, including improvement to the existing network of local roads, to serve a reduced quantum of development in this area.</p> <p>Regardless of the final Option chosen in this area we would strongly recommend that allocations here are grouped together and that the council works closely with the Worcestershire Green Infrastructure Partnership to deliver an overarching Green Infrastructure Concept Plan for the area so that the extension to eastern Kidderminster achieves the best GI outcomes possible. We would be pleased to discuss this further with the council if that would be helpful. Please see our response in relation to paragraphs 6.54 – 6.56 and Policy 31 for further comments on the matters set out above.</p>	
Gladman Developments Limited	LPPO1344	Policy 6D	Support	Gladman acknowledges role that strategic sites such as urban extensions can play in contributing to development needs. However, it is essential that well developed assumptions are applied when determining timing and extent of delivery that are expected to be achieved over the plan period.	Support is noted.
Persimmon Homes	LPPO1439	Policy 6D	Object	Elements of Option A are to be preferred as will achieve the most benefits in terms of infrastructure	Objection noted.

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Limited				<p>provision and will enable the entire Kidderminster East expansion to be planned as a comprehensive basis. For this reason Option A should be included in its entirety.</p> <p>Some elements of Option B may be deliverable, to provide continuity of supply, but does not favour the Lea Castle site or its proposed extension. Have commented on other sites which should be excluded from the plan for policy, technical and environmental reasons. Option A should be included together with those elements of Option B which are not objected to. The sites can contribute to the increased housing requirement which will be needed to meet the overspill requirement from the Black Country and Birmingham.</p>	
Churchill and Blakedown Parish Council	LPPO1022	Policy 6D	Comment	Only one proposed site in the Parish (employment site at Hodge Hill) so proposals not wholly in conflict with Neighbourhood Plan (July 2017). However, serious concerns re traffic implications of proposed developments, especially core sites proposed east of Kidderminster.	Comments noted.
Miller Homes	LPPO949	Policy 6D	Support	Support the principle of an urban extension to the east of Kidderminster. Whilst it is recognised that the proposed composition of the urban extension(s) to Kidderminster is not yet fixed, due to the fact that there is a choice between Option A and Option B sites within the consultation document, our client supports	Support is noted.

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				the approach set out for having a number of key Core Sites which will form the basis of the urban extension(s) irrespective of which additional Option sites are chosen. As part of this process, and for the reasons set out in the response to proposed Policies 7 and 31, our client also endorses the decision to include the Hurcott Area of Development Restraint (ADR) as one of the Core Sites.	
Barratt Homes West Midlands	LPPO770	Policy 6B	Comment	Policy 6D is superfluous given that there is a specific policy included within the plan (Policy 31) that provides guidance on the Kidderminster’s proposed urban extensions. We consider the proposed urban extensions to be inappropriate. See response to Policy 31.	Comments noted.
Homes England	LPPO801	Policy 6D	Comment	Policy 6D proposes two urban extensions at Kidderminster to deliver a significant proportion of the housing required for the Town. One of these is the former Lea Castle Hospital site, which the HCA supports. Redevelopment of this brownfield site will deliver up to 600 new homes, employment and community facilities, providing publically accessible open space. The site is within the Green Belt, but it is a brownfield site, and its redevelopment would better use of the site, which currently lies redundant and in a derelict state.	Comments and site options noted.

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				<p>The site is in a sustainable location on the north-eastern edge of Kidderminster, providing good access into the Town and surrounding areas. The site is enclosed by woodland, its redevelopment would not harm the character of the landscape. The inclusion of this site as a proposed urban extension and a core housing site, and inclusion of the site within the Council’s housing supply, is supported. The site is available for development and a planning application has been submitted for its redevelopment.</p> <p>The second urban extension is ‘East of Kidderminster’. It is noted that the composition of this urban extension is to be determined through this Preferred Options consultation. It is considered that further development around the former Lea Castle Hospital would provide an appropriate location for further large scale development, such as land to the east of the hospital site, included as potential housing site Lea Castle Hospital Extension (East) under Option B. High level technical work has been undertaken in relation to this site to demonstrate how the site could be developed for around 360 dwellings. This is set out in the accompanying Supporting Document which is to be read in parallel with this representation. It should also be noted that the HCA owns the land to the west of the Lea Castle Hospital site which could also support the Council’s objectives of delivering housing should the Council consider the site to be appropriate for</p>	

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				development.	
Campaign to Protect Rural England	LPPO924	Table 6.0.6	Object	We accept the need for the main part of the Lea Castle Hospital site to be redeveloped but question need for other substantial urban extensions.	Objection noted.
Sport England	LPPO210	Policy 6D - Kidderminster Urban Extensions	Comment	<p>The ex hospital site at Lee Castle includes an existing playing field. Whilst the live planning application aims to protect that playing field as part of the scheme no evidence is provided to show this is adequate to meet the needs of new residents and no ref. has been made to the forthcoming PPS. Both protecting existing and providing new playing fields to ensure there is sufficient supply of playing fields needs addressing in the light of the PPS.</p> <p>There appears to be no playing field issues relating to East of Kidderminster</p>	Comments noted. An Open Space Study, Playing Pitch Strategy, and Indoor & Built Facilities Strategy has been published and will be updated for the pre-submission consultation.
	LPPO296	6D	Support	Generally supporting this policy as most employment for residents likely to be on the East and North sides of the district.	Support is noted.

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	LPPO297	6E	Support	Support for Policy 6E.	Support is noted.
Sport England	LPPO211	Policy 6E - Role of Market Towns	Comment	Cross ref. to the PPS should be made to ensure sufficient protection/provision of outdoor sports facilities.	Comment noted.
Campaign to Protect Rural England	LPPO932	Policy 6E	Comment	The policy is generally unobjectionable. However we would question the appropriateness of some of the urban extensions proposed for Stourport and Bewdley. These are dealt with in our site-specific comments.	Comment noted.
Bewdley Town Council	LPPO824	Policy 6E	Support	<p>The Town Council is in agreement with the overall description of Bewdley as "an attractive historic market town and popular visitor destination" and happy with the town's place in the Settlement Hierarchy. It is felt that Bewdley's development needs can be met without adjusting the settlement boundary.</p> <p>Agree with Policy 6E and paragraphs following. Many of the draft policies in the Bewdley Neighbourhood Plan echo this policy. Conserving Bewdley's historic setting and landscape character is very important.</p> <p>Bewdley Town Council support the limited release of specific sites from the Green Belt. These sites are the Neighbourhood Plan's preferred development sites.</p>	Support and comments are noted.

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Barratt Homes West Midlands	LPPO771	Policy 6E	Support	We support the recognition in Policy 6E that Stourport-on-Severn should make an “important” contribution to meet the District’s requirement for new homes. Stourport-on-Severn is the second largest settlement within the District. It accommodates approximately 20% of the District’s population. It should, therefore, be a focus for growth. We are, however, concerned that the emerging plan fails to make a sufficient number of allocations at the town to meet its growth requirements. Indeed, under Option A only 13.89% of the housing requirement will be delivered in Stourport. We comment on this matter further in our response to a Key Choice for Development Strategy and our response to Policy 32.	Support is noted. The Site Selection Paper provides detail on the decisions that have been made in terms of the development growth strategy for the District. This is also evidenced in the Sustainability Appraisal report.
Chaddesley Corbett Parish Council	LPPO1036	Policy 6E	Comment	The acceptability of any green belt release should be determined against the criteria for rural exception sites.	Green Belt release has been informed by the Green Belt study. Policy 8C sets the criteria for rural exception sites.
Stourport on Severn Civic Society	LPPO1293	Policy 6E	Comment	<p>We question some of the assumptions behind this Review:</p> <ul style="list-style-type: none"> Local retail sector in Stourport does not just cater for local needs, as in Bewdley. We have three large supermarkets which cater for a district-wide market. The comment in 6E that “New retail development proposals should be appropriate to the town’s position in the District’s settlement hierarchy” reflects an 	Comments noted.

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				<p>inaccuracy about the town’s true position.</p> <ul style="list-style-type: none"> Stourport has a significant, and growing, night-time economy including the Civic Hall, The Swan, The Wharf together with a number of eating places and live music. Why should night-life be centred on Kidderminster? This assumption does not accurately reflect the reality. Stourport has as much night-life as Kidderminster and is a safer environment. <p>Stourport is developing a significant offering of night-time entertainment and food and this should be recognised and supported by appropriate facilities.</p>	
Stourport on Severn Civic Society	LPPO1294	Policy 6E	Comment	<p>Frequent mention is made of promoting heritage tourism in Stourport but this requires adequate provision of public toilets in the town centre, sufficient parking and provision of “set down” points for coaches together with coach parking. We see no mention of the provision of such facilities in your Review.</p> <p>We welcome comments about maintaining the heritage environment of Stourport and developing heritage tourism. Part of the attraction of the town is the surrounding rural environment and care needs to be taken to maintain this.</p>	Comments noted.
Gladman Developments Limited	LPPO1345	Policy 6E	Object	Gladman object to the intention to limit Bewdley’s contribution towards the District’s housing needs. This conflicts with the presumption in favour of sustainable	Objection is noted. The Site Selection Paper provides detail on the decisions that have been made in terms of the development growth

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				development. Bewdley has a good level of service provision and is well placed to benefit from Kidderminster's offer. The plan should not ignore Bewdley's housing needs.	strategy for the District. This is also evidenced in the Sustainability Appraisal report.
Persimmon Homes Limited	LPPO1586	Policy 6E	Comment	<p>Not much potential development land within Bewdley, however this should not limit the ability of the town to grow and to allow continued support to its local services, facilities and residents. It will be necessary for focused Green Belt land releases to take place, on sites that do not significantly contribute to the purposes of the Green Belt.</p> <p>Enough land is needed for local needs for Affordable Housing. Further land will need to be released to allow for Affordable Housing which is needed within the area.</p> <p>The Council should consider the release of Green Belt land around the settlement in order to provide the necessary sites over the period of the plan.</p> <p>Development Strategy</p> <p>Concern with having Options A and B, also the way they have been presented and the lack of a preferred option.</p> <p>Table 6.0.3 sets out the availability data for the District</p>	Comments noted.

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				<p>in order to calculate the residual requirement for housing. RPS disagrees that lapsed planning permission should be included within this calculation and should not contribute towards the potential supply at the time of the calculation. As these have lapsed they no longer hold a valid planning permission and cannot be relied upon as part of the Council’s supply of housing. The Council has not distinguished between the existing and lapsed planning permissions and so it is not possible to calculate accurate availability data with the information provided. However, it is likely that this would result in a significant increase in the current shortfall in housing for the District.</p> <p><i>Options for Growth</i></p> <p>Do not consider that the Local Plan has looked fairly or reasonably at the options for growth as part of the development strategy for Wyre Forest District. The options presented are not balanced and do not allow for an honest discussion of the ways in which Wyre Forest can grow. As such the Council has merely presented its preferred option set against a less favourable strategy that is not a genuine alternative option.</p> <p>We do not consider that the options should be mutually exclusive and that a preferred option may be a mixture of the two stated options. If Option A or B</p>	

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				<p>were chosen it may not be the most suitable and acceptable way forward for a given settlement. Bewdley is considered for future development in option B where Catchem’s End is proposed. If Option A was chosen this would result in Bewdley only having marginal growth in housing which would be unacceptable and result in unsustainable growth.</p> <p>Bewdley accounts for 10% of the population within the District and requires a proportionate amount of housing. Option A for Bewdley would mean that the settlement would have a total of 175 dwellings allocated across the plan period, only 3.2% of total housing requirement. If Catchem’s End were to be included this would only rise to 4.6% of the housing requirement which is not commensurate to the size and capacity of the settlement.</p> <p>Realistic options for the future growth in Bewdley should be presented which can give an honest appraisal of sites and development locations in the town.</p> <p>Local Plan is inconsistent with the Bewdley Neighbourhood Plan. The emerging Neighbourhood Plan is indicating higher levels of housing growth for Bewdley, in keeping with the positive principles for growth in the NPPF. If Option A were to be chosen it would be inconsistent with the Neighbourhood Plan</p>	

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				<p>which has proposed Catchem’s End for a housing allocation. The Council should align with the emerging Neighbourhood Plan.</p> <p>No clear evidence why two Options were chosen. The two options appears to be engineered to produce Option A as the preferred option but doesn’t favour the Core Settlements of Kidderminster, Stourport and Bewdley. A fairly justified preferred option with each settlement having a direction of growth is required.</p> <p>Sites should be considered and proposed individually depending on the settlements need rather than as a whole district. Catchem’s End was included in the Sustainability Appraisal (May 2017) which identified no significant constraints. whilst also identifying a number of economic and social benefits by providing housing to support the growth in the local workforce and by providing a large area of public open space. The site is not mentioned in the settlement summary within the SA (part of appendix G.8) it performs strongly against other sites.</p> <p>There are a number of shortcomings with the current plan which need to be addressed not only in calculating the current supply and shortfall of housing within the District but also within the consideration of options for housing growth. Whilst no evidence based has been shown which shows how the Council have</p>	

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				derived the two options it is clear that they are not mutually exclusive and the presentation has been engineered from the offset. RPS considers that the process of choosing sites should be based on the individual settlements needs which does not seem to have occurred and should be revisited.	
Stourport High School	LPPO1175	Policy 6E The Role of Stourport on Severn	Object	We support the recognition in Policy 6E that Stourport-on-Severn should make an “important” contribution to meet the District’s requirement for new homes. Stourport-on-Severn is the second largest settlement within the District. It accommodates approximately 20% of the District’s population. It should, therefore, be a focus for growth. We are, however, concerned that the emerging plan fails to make a sufficient number of allocations at the town to meet its growth requirements. Indeed, under Option A only 13.89% of the housing requirement will be delivered in Stourport. We comment on this matter further in our response to “Key Choice for Development Strategy” and our response to “Policy 32”.	Objection noted. The Site Selection Paper provides detail on the decisions that have been made in terms of the development growth strategy for the District. This is also evidenced in the Sustainability Appraisal report.
Bewdley Civic Society	LPPO821	Policy 6E??	Comment	<p>The Bewdley Civic Society (BSC) supports the general statements and description in the Review of Bewdley's role as a Historic Market town and popular tourist destination, particularly in its drive and desire to...</p> <ul style="list-style-type: none"> Continue the role of the Green Belt and other Landscape Protection Policies to protect the town's identity, historic setting and the 	Comments noted.

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				<p>attractiveness of the surrounding countryside.</p> <ul style="list-style-type: none"> • Continue to preserve and enhance the Conservation Area and its Listed Buildings. • Provide new housing in accord with the Neighbourhood Plan's consultation results. • Protect the town from large scale retailing. • To enhance sustainable transport links between the various tourist attractions and the town. 	
	LPPO594	6E	Support	Any development west of the River in Bewdley that would increase traffic in Welch Gate & thus further reduce the air quality should be prevented.	Support and comment noted.
Taylor Wimpey West Midlands	LPPO1476	Policy 6E	Support	<p>Role of Stourport on Severn and Bewdley as part of the development strategy, recognising that Stourport-on-Severn has a more strategic role than Bewdley within the settlement hierarchy is supported.</p> <p>As a sustainable settlement, it is right that Stourport-on-Severn makes an important contribution to meeting the District's requirements for new homes within the Plan period.</p>	Support and comments are noted.
Historic England	LPPO1267	Policy 6E	Comment	Policy 6E regarding market towns - could usefully include a clause relevant to the local historic environment. We support the reference to heritage	Support for Heritage Tourism within Policy 6E noted.

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				tourism in this policy.	<p>ACTION:</p> <p>Revise Policy 6E - Role of Stourport-on-Severn:</p> <p>Paragraph 1 to read:</p> <p>"Within the District's market towns of Stourport-on-Severn and Bewdley, both of which have Conservation Areas at their town centres,the following development proposals will be sought:"</p> <p>ACTION:</p> <p>Revise Policy 6E Stourport-on-Severn:</p> <p>Add bullet point:</p> <p>"Development within the three conservation areas should preserve or enhance those areas"</p> <p>ACTION:</p> <p>Revise Policy 6E Bewdley:</p> <p>Add bullet point:</p> <p>"Development within the Bewdley and Wribbenhall conservation areas should</p>

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					preserve or enhance those areas"
West Midland Safari Park	LPPO1326	Policy 6E	Object	Policy 6E looks to enhance the role of Bewdley as a sustainable tourist destination through a particular focus on transport links to among other places, West Midland Safari Park. The policy could be used to justify requests to developers to make off-site provision or financial contributions. We object to this Policy as currently drafted. As with Policy 6C, this policy and/or the supporting text should be amended to more closely reflect paragraph 32 of the National Planning Policy Framework so that it is made clear that such provision or such contributions will only be sought where the residual cumulative impact of developments are severe, and where it is practical and viable so to do. The amendments should be as 6C.	Objection noted.
Wyre Forest Community Housing	LPPO1650	Polkicy 6E	Support	We are in support of this policy and we particularly support small-scale Green Belt release and green field development.	Support is noted.
	LPPO3677	Policy 6E	Object	6E - It appears you have changed the nature and characteristic/distinctiveness of Kidderminster as it is now not mentioned as a Market town, whilst Stourport and Bewdley maintain this title. When was this characteristic changed?	Objection is noted. Kidderminster was not identified as a 'market town' in the currently adopted Local Plan (see para 5.33 of adopted Core Strategy.) Both Stourport-on-Severn and Bewdley benefitted from their status as 'market towns' under the Advantage West Midland (AWM) Market Towns Initiative.
Wolverley & Cookley	LPPO1156	Rural Develo	Comment	Wolverley and Cookley Parish Council are supportive of the need for housing development but want to ensure	Comments noted.

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Parish Council		pment		it happens in the right places and want to ensure that the identity and integrity of our individual villages is retained as this is vitally important to the local communities.	
Historic England	LPPO1268	Policy 6F	Comment	Under Policy 6F for Villages and Rural Areas we would recommend including a clause on protecting historic farmsteads.	Comment on Policy 6F noted. ACTION: Policy 6F The Rural Economy to have the following clause added: "Historic farmsteads will be protected from inappropriate development: for details refer to Policies 26 and 28A".
Taylor Wimpey West Midlands	LPPO1477	Policy 6F	Support	Support Policy 6F to limit new residential development in the rural villages to meet local housing needs only. This is reflective of the settlement hierarchy where the most sustainable locations meet identified development needs.	Support noted.
	LPPO1591	Policy 6F	Comment	The land designated WFR/CB/7 has over 7 ha of prime agricultural land.This is proposed as core employment use.	Comment noted.
Land Research & Planning Associates	LPPO550	6F	Object	Policy that restricts provision of affordable homes as "exception sites" requires urgent modification. There is a 'District Wide' deficit and where a landowner is willing to provide land adjacent to or close by existing	Objection noted.

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Ltd				rural settlements and allow at least 50% affordable homes and /or Starter Homes, then this should be supported by the LPA to pave the way of reducing this serious deficit. The Policy should be modified to assist.	
Worcestershire County Council, Planning Economy & Performance	LPPO1134	Policy 6F - Role of the villages and rural areas	Comment	<p>In practice, would the second bullet point under 'The Rural Economy' heading be too restrictive, given the amount of best and most versatile agricultural land in the district? 'Adverse impact' on best and most versatile could be argued for many different development proposals, and could be better expressed as direct and significant impact or a changing of the policy wording to reflect the need to look first to lower quality land wherever possible?</p> <p>Also under 'The Rural Economy', it is not clear what "small scale" means in part (i) of the third bullet point. In part (iii), we question the use of use wording that differs from that used in the NPPF, which does not mention "integrity as this may result in intended debates over the nature of the Green Belt and its function and appearance.</p>	Comments noted. These points raised will be considered in policy update.
Gladman Developments Limited	LPPO1346	Policy 6F	Object	Although the 3 towns must play a key role in accommodating future development, this must not be at expense of ensuring needs of smaller settlements are met. Para 55 of NPPF seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. The development strategy	Objection noted.

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				must allow such settlements to thrive. The proposed approach in the emerging local plan risks smaller settlements being considered as unsustainable in principle. It contains no mechanism to allow them to improve their sustainability.	
Horton Estates Ltd	LPPO850	Policy 6F	Comment	This draft policy fails to acknowledge draft Policy 34 which permits certain forms of development at PDL sites in the Green Belt and rural areas. It is requested that this policy be cross-referenced in the final sentence of draft Policy 6F (where there is currently a cross reference to Policy 35).	Comment noted. This suggestion will be considered in policy update.
	LPPO415	Section 6	Object	<p>I wish to object to the development proposals particularly those relating to options A and B involving the extensive housing and industrial development to the east of Kidderminster. It would be a mistake to allow building in these areas for many reasons:</p> <ul style="list-style-type: none"> • The proposed development would be too close to existing housing and merely enlarge the urban reach without any character. • The area is valuable as a green space which is used by existing residents/council tax payers who would be deprived of an amenity which contributes to a healthy life. The Council does has a responsibility to safeguard the quality of life and health of residents. • The area concerned is agricultural and wildlife habitats whose loss would impact on Hurcott 	Objection and comments noted. The Issues and Options consultation stage informed the growth options for the Preferred Options document.

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				<p>Wood. We cannot afford to lose farming especially if there is an increasing population.</p> <ul style="list-style-type: none"> • An eastern bypass would be impossible if the area to the east of Kidderminster is already built on. • There would be too much strain on existing medical surgeries and it is unlikely that new practices would be set up. <p>The plan envisages increasing the population of Kidderminster by 6000 houses, 10-20,000 people. There is little movement in, so really no need. Many will have to commute to Birmingham to work. The town will become a city and an urban satellite.</p> <p>If the expansion has to go ahead then I would support the proposal of OCAG-LP for a Lea Castle sustainable village to the north. This has many benefits as it could be self-sufficient and not deprive residents of important services and amenities. The grand plan does not evaluate various options for Kidderminster so it is not clear how the present plan was arrived at. If this was to be done (and published) then the relative advantages of a Lea Castle Village may be seen.</p>	
Wyre Forest Friends of the Earth	LPPO1311	Paragraph 6.1	Comment	In the Summary of Issues and Options Response there is again concern about poor public transport along with traffic congestion. Implementing a modal shift away from car use needs to be planned and implemented	Comments noted. The emerging Local Plan has been informed by Transport modelling work. We also consult with the Highways Authority, Worcs County Council in terms of the highways

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				<p>during the plan period.</p> <p>For Bewdley, the summary states that new developments on brownfield sites in or adjacent to the town centre is limited by various factors including the Welch Gate air quality management area. This AQMA has been in place since 2003. Despite an action plan the only measure implemented has been a change in priority at the junction of Welch Gate with Dog Lane. The only effective action would be changing Welch Gate to a one way traffic flow or other traffic management measures in Bewdley town centre.</p>	<p>improvements required.</p>
	<p>LPPO3934</p>	<p>6.1</p>	<p>Object</p>	<p>The Draft Local Plan excludes the areas of Blakedown, Churchill and Wolverley. Blakedown having the advantage of a railway station could provide ideal commuter opportunities to Birmingham and the West Midlands. However, given the objectives in the recently adopted Blakedown and Churchill Neighbourhood Plan, it would suggest that objectives within that Neighbourhood Plan, protecting tree scape, paths and green space, are not equally prioritised in other areas of the Wyre Forest District.</p> <p>Guidance on the Housing and Economic Development Needs Assessments, 2015 states 'Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios</p>	<p>Objection noted.</p> <p>The Bromsgrove District Local Plan is having to undertake an early Local Plan Review which includes a Green Belt Review to meet its housing shortfall.</p>

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				<p>that could be reasonably expected to occur’.</p> <p>This would suggest that objectively assessing housing need in the shorter term, as referenced in the Bromsgrove Local Plan, would alleviate the need for Green Belt land release.</p> <p>The absence of Blakedown and other areas within the Draft Local Plan, results in a plan that is neither in accordance with the guidelines for public consultation but also fails to meet requirements of both YouGov and Rural and Town Planning Institute best practice.</p>	
Wyre Forest Green Party	LPPO1410	Para 6.1	Comment	In the Summary of Issues and Options Response there is again concern about poor public transport along with traffic congestion. Implementing a modal shift away from car use needs to be planned and implemented during the plan period.	Comments noted. The emerging Local Plan has been informed by Transport modelling work. We also consult with the Highways Authority, Worcs County Council in terms of the highways improvements required.
	LPPO358	6.1	Comment	As a professional Biologist I can tell you that continued growth of the population (local and national) is not sustainable: politicians appear not to understand that population growth (note: I am not singling out migration or immigration, but 'population' as a whole) is not linear. Therefore, a pro-growth agenda for population is a terrible mistake.	Comments noted.
CORE11	LPPO200	6-1	Support	Support for paragraph 6.1.	Support is noted.
	LPPO4482	Summa	Comment	<i>“Local opposition from local residents (particularly the</i>	The source of the information in the ‘Summary

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		ry table - Issues and options		<i>Spennells Housing Estate) in respect of an Eastern Kidderminster extension (Option 3) although some support for this approach was expressed from other quarters-“ What support is this from and under what reason?</i>	Of Issues and Options Responses’ is from the Issues and Options consultation responses; a public consultation undertaken in 2015.
	LPPO3732	Paragraph 6.1	Object	The summary is biased and selective and is not supported by evidence within the report. I objected to option 3 and live outside of the Spennells yet there is no mention that some residents outside of this area also rejected the eastern Kidderminster extension – the document is flawed.	Objection noted.
	LPPO3734	Paragraph 6.3	Object	The amount of development that the Council says is required is completely fictitious and does not take into account the three independent analysis carried out by Oxford Economics, Cambridge Econometrics and Experian, which are dismissed by the OAHN report. Instead, the contracted Edge Analytics based upon a high unrealistic growth rate that is un-characteristic of Why Forest is taken forward. I object strongly to the methodology used, the bias that is systematically infused within the report and the conclusions reached. This is an attempt by the Council to grow the district un-naturally and completely alien to historic data without consideration to neighbouring competing areas nor what history has made obvious. The Council appears to remain oblivious to what people actually do	Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.

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				and remains tranced by an idealised model of the future based upon perfect scenarios that simply will not become reality. The Council has not learned lessons from more recent development at Easter Park where green belt was used to provide empty units that remain vacant since construction to the present date.	
	LPPO3678	6.3	Object	6.3 There is not good transport links between Stourport and Bewdley as you state. The bus network is not sufficient and is not reliable. And there is no train network. Please advise your evidence.	Objection noted.
	LPPO3679	6.4	Object	6.4 This contradicts your proposals as you will be destroying good agricultural land which the country needs more than ever as Brexit approaches. Has Brexit been factored into these proposals.	Objection noted.
	LPPO1949	Para 6.4	Comment	<p>Shocked and disappointed re plans to build on green field and green belt sites on any proposal. Have noticed how many new builds in Wyre Forest area over recent years have been done on brown sites which is understandable -such as old factory sites -sugar beet/bottom of Clensmore/old garage sites / car parks etc. So am disappointed to see green sites now targeted.</p> <p>The area has had many new builds of late, e.g. Clensmore; Silver woods. Fail to see how eastern by pass would ease increase of projected traffic if plan A taken as traffic still to get around town which is already</p>	Comments noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.

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				<p>congested. Plan B will cause total gridlock on Stourbridge road, Broadwaters, Horsefair roads.</p> <p>Appreciate Lea Castle a brown site, but fail to see how our town can cope with traffic, pollution, lack of hospital. Can't see shops, new coffee bars and restaurants thriving as too much traffic to get there - not enough parking -not enough local employment to be able to afford.</p> <p>Building so near to Hurcott Woods is totally unacceptable re wildlife fauna and flora -and unfair on villagers. As is building back of Spennells is spoiling residents walking and well being. How does that serve to reduce obesity and encourage healthy lifestyle?</p> <p>Can't see the point of building more cafes; restaurants and cinema re Bromsgrove St area. Maybe new care homes better sited there.</p> <p>Please respect our wildlife and environment and give nature a chance. DO NOT SPOIL OUR GREEN FIELDS AND BELT.</p>	
	LPPO3935	6.4	Object	In 2012 the NPFF requires 'relevant planning authorities should take into account the economic and other benefits of the best and most versatile land' The fields bordering the Spennells estate are good quality grade 2 agricultural land, but there is no reference to	Objection noted.

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				this grading in the Draft Local Plan. The single non specific reference is 6.40 'the quality of agricultural land is generally very high in the area, rising from the east and south east of Kidderminster to the district boundary'	
	LPPO4716	6.4	Comment	6.4 (page 25) The 'Key Diagram' mentioned in this paragraph says it supports the Development Strategy. It is indicted that it can be found on page 104 but that doesn't appear to be the case in this document. Is it somewhere else? Is it the diagram on page 108?	Comment noted. Agree - the Key Diagram is on page 108 in the Preferred Options document.
	LPPO505	6.5	Object	House prices here are lower than in other parts of the West Midlands, a lot of houses for sale can take a while to sell. I cant see why we need so many new build houses in the next 17 years.? to take away the green belt which provides a sense of openness and space.	Objection noted. We have to plan for future population growth and the housing need for the District.
	LPPO469	paragra ph 6.5	Object	In my opinion we do not need 300 new homes p.a.	Objection noted.
	LPPO280	Housin g	Comment	The area needs extra housing, but it should be carefully planned. Some existing developments cram in too many properties EG the Bellway estate. No attention has been given to the adjacent canal - it has been ignored. Has any thought been given to converting Crown House to flats rather than demolition or leaving it empty?	Comments noted There are plans to demolish Crown House and regenerate that area of Kidderminster.
CORE11	LPPO201	6-5	Comment	At 6-5 para d line 3 This line could be broadened to	Commented noted.

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				identify that" green infrastructure" is being recognised.	
	LPPO477	paragra ph.6.5	Object	I do not believe that Wyre Forest District needs 300 more properties per annum. Also as there is a need for 540 elderly persons accommodation, I believe that a development like some of the developments in Birmingham which are more like village communities where there is a Doctors surgery on site would be more suitable on the Lea Castle Hospital site than 600 houses/flats.	Objection noted.
	LPPO3735	Paragra ph 6.5	Object	For the reasons sighted in paragraph 6.3, the level of development is completely inappropriate for the district what is based upon flawed analysis. It is obvious that the Council is simply trying to justify Government investment to build its Eastern Bypass by belligerently building houses. A strategy from the past that simply will not deliver the benefits the Council thinks possible. The Council is trying to build virtually a new town on the outskirts of Kidderminster that will become a sole-less place of cheap housing boxes.	Objection and comments noted. The housing requirement is based on the Objectively Assessed Housing Need (OAHN) study. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.
	LPPO4715	6.5	Comment	I am concerned the figures given on the plan for the number of houses required each year to 2034 seems to be very high compared with the actual growth of Wyre Forest's population in recent years. I believe that we need more 1 and 2 bedroom properties locally in order that young people can get a foot on the property ladder or rental market and older people can downsize to free up family homes. The mention on the plan of	Comments noted. The housing requirement is based on the Objectively Assessed Housing Need (OAHN) study. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.

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				510 care homes needed locally seems rather high and goes against current NHS guidance that people should remain and be cared for in their own homes.	
	LPPO4116	6.5 general objection	Object	<p>As a preliminary matter, in spite of being significantly affected by the proposed core housing development, we have not been personally notified/served by either the council or others in respect of the proposed application(s).</p> <p>It is unclear what the impact of the apparent proposals of significantly increasing the amount of properties by over 6,000 will be; thus increasing the population by around 18,000. It is a known fact that we already have overburdened health & social care services locally e.g. NHS (GP practices & closure of A&E at Kidderminster Hospital), Schools and Children's Services.</p> <p>What research/surveys have been undertaken in respect of the impact upon the environment of the construction of a relief road? Bromsgrove Road which at peak times is already busy.</p> <p>Similarly, what research has been undertaken in respect of the impact upon the environment of building so many homes on green belt land when there are large swathes of Kidderminster on brown field sites which have been allowed to become semi-derelict,</p>	The emerging Local Plan is supported by a number of evidence base studies which include ecological appraisals of sites, a Sustainability Appraisal and Transport modelling work. These evidence base studies have helped to inform the plan and the final site selection. The evidence base studies will be available to view on the Council's website throughout the consultation period.

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				<p>including the old post office.</p> <p>The town resembles a car boot sale with virtually all shops vacant and with no evidence of any attempt at regeneration. Furthermore, there is an apparent unexplored brown field site at Lea Castle and numerous other sites. Given this, and the areas of natural beauty (about which several others have addressed, including in pictorial format) we regard both proposals "A" and "B" to amount to wanton destruction.</p>	
	LPPO4119	6.5 general comments	Comment	<p>Having referred to WCC population statistics for 2012 (the last available statistics), I note that around 22,000 of the population are aged over 65.</p> <p>Most facilities in Kidderminster are based in or near the town centre (supermarkets, shops, health centres).</p> <p>If homes more suited to the needs of the older population were to be provided near the town, this would:-</p>	Comments noted.

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				<p>free up family properties on the outskirts of the town, where schools are already available, reducing the need to build more housing in outlying areas.</p> <p>reduce social isolation.</p> <p>regenerate parts of the town centre, which is extremely depressed, especially now that the Central Business District has moved towards Weavers Wharf. There is little to attract anyone, local or visitor, to the town.</p> <p>Preserve green belt and productive agricultural land.</p>	
	LPPO4125	6.5	Support	<p>Attracting new businesses is a massive undertaking, and faces enormous competition. There is no evidence that Wyre Forest has been successful at this in the past.</p> <p>Until there is a proven and successful plan to “grow” the local business base, the intention seems to be to</p>	Comments noted.

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				meet a need that simply doesn't exist.	
Wyre Forest Friends of the Earth	LPPO1312	6.5 Housing Provision	Comment	Housing Provision. The population has been relatively static over the period 2001-2015 with a rise of 2.7%. The draft local plan assumes 300 dwellings are required p.a which would equate to an annual population growth of 7.7%. It is difficult to see how such a high growth rate is justified and it is likely that the actual growth rate is similar to the recent historical average. Consequently the total of new dwellings required is likely to be less than 3000 removing any need to build on the Green Belt.	The housing requirement is based on the Objectively Assessed Housing Needs (OAHN) study which uses population projections and household projection data published by the Office of National Statistics.
	LPPO172	6.5, point d	Comment	Infrastructure: development to the West must take into account increased traffic flow to employment (motorway, railway, Worcester). Traffic from Bewdley either goes passed the Safari park/hospital/Sutton Park road, or Stourport (Gilgal/switch back/bridge. It makes more sense to develop to the East, with direct access to roads to Hagley & Worcester.	Comments noted.
Moor Park Trustees	LPPO1102	6.6 Housing need	Comment	The draft policy appears to fail to deal with any issues of unmet housing need from the wider area and/or neighbouring authorities. There should be provision for adjustment of figures to allow the local Plan to effectively address any issues which arise and a commitment to meeting the specified housing requirements by the end of the plan. The local authority should treat housing requirements for the area as a minimum and commit to fulfilling the	Although Wyre Forest District is its own housing market area, WFDC continues to undertake Duty to Cooperate discussions with its neighbouring Local Authorities during the Local Plan Review process to ensure NPPF requirements are met. Since the Preferred Options document was consulted on, the Government have published

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				<p>requirements by 2034 to in order to boost housing supply as is a requirement within the NPPF. The plan should demonstrate that minimum targets should be met and exceeded during the plan period as well as continuing to keep an up to date five year housing land supply There should be a policy within the local Plan which sets out measures to ensure that the latter is sustained and not simply state that “sufficient” land will be provided to meet such needs.</p>	<p>their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO4055	Paragraph 6.6	Object	<p>One worrying thing we noted at the planning meeting was the planned Dwelling number for Wyre Forest was a set number but the figure for Care Facilities was Zero? Worrying when we have a growing population of elderly, they also need facilities not just the younger working population?</p>	<p>Objection noted. The Preferred Options document did include a requirement for C2 use (i.e. care homes / nursing homes for the elderly). This was set out in Policy 6A – Development Need for the district. The C2 requirement was 540 over the plan period.</p>
	LPPO3824	6.6 Housing Need	Comment	<p>Proposes :</p> <ul style="list-style-type: none"> • That regular (every 5 or 10 years) assessments are carried out concerning the need for additional housing in the Kidderminster area as there has been little or no increase in the population of Kidderminster over the past twenty years. • Should the need for extra housing be significantly less than the estimated population growth then the valuable agricultural land earmarked for development should be optimised and continue to provide much 	<p>Comments noted.</p>

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				<p>needed food produce and reduce the need to import food from elsewhere. As we all know once arable land is developed for housing there is no going back.</p>	
	<p>LPPO3956</p>	<p>6.6 Housing Need</p>	<p>Comment</p>	<p>We understand the need for further housing in Wyre Forest to facilitate affordable housing and social housing for local people. We do not agree that as much as a 12% growth in the number of households in Wyre Forest is required to accommodate migration to the area. If, as the plan suggests Wyre Forest has a 54% increase in the aging population (but you do not break it down to specific age groups ie, over 65yrs, over 75 yrs, over 85 yrs etc) leading up to 2034 and a reduction in younger population (due to low birth rate), requiring local housing, then isn't it feasible that there will be an excess of housing as current and future older residents die, with fewer younger generations requiring housing? Therefore I think that the estimated number of new houses needs to be reviewed to take this into account.</p> <p>The plan also mentions having more residential units, or care homes to accommodate the aging population. As Wyre Forest does not have any in-patient unit at Kemp Hospice maybe this would be an opportunity to consider having specialist palliative care beds within such institutions to accommodate individuals requiring</p>	<p>Comments noted. The Objectively Assessed Housing Needs (OAHN) Study does consider the population of Wyre Forest District and the growing elderly population that we have in the District. This study provides the evidence base for our housing requirement and helps to shape the housing policies within the emerging Local Plan. The proposed site allocations also include allocations for C2 use (i.e. nursing homes / care homes).</p>

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				<p>specialist palliative care in the area. Even better, consider building a hospice on one of the brownfield sites such as Sladen or Sion Hill and then the existing Kemp Hospice (which was originally residential and not purpose built) could be converted into residential flats/apartments.</p>	
	<p>LPPO3965</p>	<p>Paragraph 6.6</p>	<p>Object</p>	<p>Quote from Government news:</p> <p>"Getting the right homes built in the right places</p> <p>Consulting on the principle of a new, standardised way of calculating housing demand to reflect current and future housing pressures. Every local area will need to produce a realistic plan and review it at least every 5 years.</p> <p>Currently 40% of local planning authorities do not have an up to date plan that meets the projected growth in households in their area. Fixing this will help make sure enough land is released for new homes to be built in the parts of the country where people want to live and work and ensure developments take heed of local people's wishes, while continuing with maximum protections for the green belt.</p> <p>Councils and developers will also be expected to use land more efficiently by avoiding building homes at low density and building higher where there is a shortage</p>	<p>Objection and comments noted.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>

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				<p>of land and in locations well served by public transport such as train stations."</p> <p>I do hope you will listen to all the information you receive during the consultation period, especially since your plan does not meet the government guidelines to protect greenbelt.</p>	
	LPPO2938	6.6	Comment	I suggest that the numbers are reviewed and a number is put forward that more realistically represents the actual .	<p>Comments noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO3387	Option A	Object	<ul style="list-style-type: none"> • The draft plan is driven by the landowners who responded to the appeal for land. • The population growth figures are not tenable - there is a proportion of residents aged 45-65 and 65+. This population do not produce many children. • There are enough brownfield sites to cater for 	Objection and comments noted.

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				<p>what is needed - these should be prioritised.</p> <ul style="list-style-type: none"> Primary consideration should be given to revitalising Worcester Street and Bromsgrove Street with some planning for urban living. 	
	LPPO3830	6.6 Housing Need	Comment	<p>I suggest that regular (every 5 or 10 years) assessments are carried out concerning the need for additional housing in the Kidderminster area as there has been little or no increase in the population of Kidderminster over the past twenty years. Why is this area suddenly required to provide housing for an additional estimated 6,000 homes which equates to around 20 to 30 thousand people?</p> <p>Should the need for extra housing be significantly less than the estimated population growth then the valuable agricultural land earmarked for development should be optimised and continue to provide much needed food produce and reduce the need to import food from elsewhere. As we all know once arable land is developed for housing there is no going back.</p>	<p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt, some of which is agricultural land.</p>
	LPPO4170	6.6	Comment	<p>The Amion Report concludes that 5,400 new dwellings are required up to 2035. However this figure substantially overstates the demand.</p> <p>The SNPP 2014 shows a population increase of 4.7% and only a need for 199 dwellings per annum. PG – Short-Term shows a population increase of 5.8% and</p>	<p>Comments noted.</p> <p>The statistics used for the OAHN are statistics published by the Government from the Office of National Statistics.</p> <p>The OAHN follows the guidance for</p>

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				<p>only a need for 229 dwellings per annum. Our population has been virtually static since 1991. It has only grown 2.7% since 2001-2015 which would suggest both the above figures are on the high side.</p> <p>In the consultation document 300 dwellings is assumed but if we take PG-Short-Term data showing population increase 5.8% this is still more than double the rate of recent times and requires only 229 dwellings i.e. 1278 less and therefore no need to develop the Green Belt to the rear of Spennells.</p> <p>Even if we assume the population growth more than doubles when compared to 2001 to 2015 we do not need to develop the fields behind Spennells and additionally the report is over egging requirements by 878 dwellings once again evidencing no need to use Green Belt at the back of Spennells.</p> <p>The Amion Report confirms ongoing discussions with Greater Birmingham, presumably regarding overspill. Apparently, the Objective Assessment of Housing Need (OAHN) figure includes an unspecified number from Birmingham which should therefore be deducted from the total of 5,400.</p> <p>It is of interest to note that the Greater Birmingham & Solihull Local Enterprise Partnership list on their website the names of Birmingham, Solihull and its</p>	<p>determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p> <p>The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements for the emerging Local Plan.</p>

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				<p>overspill satellite towns of Cannock Chase, Lichfield, Redditch, Tamworth and the one remaining area not at present a dormitory - Wyre Forest.</p> <p>WFDC have specified the number of houses they deem to be necessary. However, they have failed to put numbers to the resulting additional GPs, town centre parking places, etc. that will be required. (People will not be walking or cycling into town for their shopping.)</p> <p>Raises questions about implementing the Greater Birmingham & Solihull LEPs Strategy and asks if it is WFDC's policy to take into account the demands from Greater Birmingham.</p>	
	LPPO4261	6.6	Object	<p>The WFDC Assessment of Housing Needs identified that 291 dwellings would be needed per annum over the next 15 years. The available brownfield sites identified within the Wyre Forest would cater for 3,000 people. This figure is an understatement as WFDC have not taken into account property that is vacant but still being let by property owners, e.g. the vacant units long Coventry Street. We do not accept that these are unobtainable, since the CPO process can be used for the benefit of the community if the owners are unwilling to sell. Even taking into account this (arbitrary) rate of expansion, there would be no need to look at non-brownfield sites for 15 years at least.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>

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					Brownfield land has been considered as part of the Local Plan Review process. A Brownfield Land Register was published in December 2017 and has been used to inform the emerging Local Plan. This register is available on our website for public viewing. The HELAA document also includes an assessment of brownfield sites.
	LPPO3827	6.6	Object	I believe the amount of housing that WFDC claims is needed (6,000 houses by 2034) is grossly inflated given the relatively static population growth in this area over the last fifteen years. The target number suggested does not take into account the local conditions regarding employment, low in migration rates and a realistic allowance for vacant properties. Recent research by the CPRE found that WFDC featured in the bottom 10 areas in the UK which have not reduced their allocated housing targets, despite having high proportions of protected countryside. WFDC was charged with accepting higher housing targets and the prospect of allowing developers to build upon environmentally valuable land. The Government's OAHN for Wyre Forest is 229 houses per year, yet this appears to have been inflated to 300 a year in the Draft Local Plan. Planning rules also state that this number should be reduced when facing the constraints.	Objection and comments noted. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	LPPO4026	Paragraph 6.6	Object	One of the key issues mentioned was a need for housing to accommodate an increasing population.	Objection noted. The statistics used for the OAHN are statistics published by the

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				<p>Based on the OAHN report, it calculates that 199 houses per year for the next 18 are required. Furthermore, Wyre forest currently has a population of 99,503 and based on the OAHN report and has grown just 2.7% since 2001 and has maintained since 2011- significantly below the national average of 10.8%. In addition, since the decision to leave the EU, it is projected that population growth will decrease on the basis that we leave the single market and thus, end free movement and some EU migrants will return to home countries as a result.</p> <p>Furthermore, the statistics have been grossly exaggerated in your report. The plan states that 300 houses are required per annum which is based on a population growth of 8.2%- this would lead to an extra 1,818 homes that are not required. Also, according to the OAHN, there are 1216 vacant homes in the WFDC, it would make more sense so use these homes. Overall, extra housing to accommodate a growing population is not applicable to the Wyre Forest and therefore, is not justifiable to build on greenbelt land.</p>	<p>Government from the Office of National Statistics.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO4440	6.6 Housing Need	Object	<p>Analysis of Housing Requirements Projections</p> <ul style="list-style-type: none"> • HELLA Report I have added up the availability presented in the Hella report. This makes for very interesting reading. 	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and</p>

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				<ul style="list-style-type: none"> ○ If the actual need were less than 3697, no Green Belt land would be required ○ If the actual need were less than 4476, only brownfield Green Belt land would be required <p>3. 8378 Green field Green Belt sites have been identified. This number obviously shows the absolute need to protect the Green Belt immediately and permanently.</p> <ul style="list-style-type: none"> ● Rounding – Justification? If the OAHN Report is accepted, then the requirement is calculated at 284 dwellings per year. The Report then rounds up this number to 300 dwellings per year. This simple unjustified action requires the building of 240 houses over the 15-year period In other words, a section of Green Belt land will be used for housing 240 houses purely because of a rounding up. Who does the rounding up benefit? My only conclusion is that it allows the developers to build more executive houses and therefore increase their profits. Why would Wyre Forest District Council take a decision which simply increases the profits of developers? Is the Council not here to serve the residents ● Vacancy rate The OAHN Report says that the number of 	<p>PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>vacant properties in Wyre Forest is 3.2% It says that there are currently 44490 dwellings in Wyre Forest It then increases the allowance for vacant properties to 4.5 %. Whilst the 4.5% figure is taken from the 2011 census, Wyre Forest District Council is legally obliged to use the most up to date data available, i.e., the current Council Tax data. There is no logical reason to use the 4.5% figure instead of 3.2% The difference between 3.2% and 4.5% is 1.3% There are 44490 dwellings in Wyre Forest This means that an extra 44490 x 1.3% dwellings will be built or 578 dwellings (39 per year). In other words, because the OAHN consultants have chosen, without statistical justification, to increase the vacancy rate by 1.3%, 578 houses will be built on the Green Belt in order to allow for them to remain vacant.</p> <ul style="list-style-type: none"> • The main OAHN calculation of housing requirement. I believe that it is absolutely impossible for a mere mortal to analyse the OAHN Report and discover how the housing requirements were calculated. It is riddled with unexplained acronyms and utter gobbledygook in a way that make it impossible to analyse and challenge. 	

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				<p>From my experience, I cannot tell whether this is a deliberate attempt to baffle residents of Wyre Forest or just because consultants are masters at making things as complicated as possible to justify their excessive charges. I have tried to replicate the calculations using data provided by the OAHN Report. I have looked at 2 population growth figures, 8.2 % which is a national average that obviously doesn't apply to Wyre Forest, and 2.1% which is the actual growth figure of population in Wyre Forest since 2001. Whilst I have used this figure it is my understanding that the population growth was all weighted to before 2011 and there has been nil growth since 2011. The figures also make no attempt to factor in potential population decline as the considerable number of European citizens in Wyre Forest falls post Brexit.</p> <p>I will try to explain my calculations as I do them:</p> <ul style="list-style-type: none"> • Latest population figure for Wyre Forest: 98960 Number of occupied dwellings: 43086 Average number of occupants per dwelling (98960/43086): 2.2968 (note: I have not made any attempt for allowing this average to decrease) 	

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				<p>Population Growth 2.1% Population growth 8.2%</p> <p>Population Growth from 98960 by 2078 or 8114</p> <p>Dwellings required (growth divided by 2.2968) 904 dwellings or 3533 dwellings</p> <p>Dwellings per year (over 15 yrs) 60 235</p> <ul style="list-style-type: none"> • As a check as to whether my calculations work, if I add together the increased number of houses to be left vacant and the houses required for increased population at 8.2% it comes to $235 + 39 = 274$ per year. This is so close to 284 that I feel that my simplistic calculation is somewhat less flawed than the number by which the consultants have rounded their calculation up. • Conclusion The figures used to calculate the housing requirement have been deliberately maximised to produce the highest possible number of houses required. There is absolutely no need to round the figures upwards. The use of 4.5% vacancy is out of date and should not have been used. The population growth figure taken by the OAHN has no basis in the reality of Wyre Forest. 2.1% is a far more realistic figure. This means that the housing requirement over 	

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				<p>the 15 year period of the local plan is far closer to 904 than 6000. The plan is totally flawed and must be totally withdrawn. There is absolutely no requirement to build on the Green Belt in Wyre Forest.</p>	
	<p>LPPO4462</p>	<p>Housing Need</p>	<p>Comment</p>	<p>The Wyre Forest Assessment of Housing Need report is flawed and only just over 3000 dwellings are required which can mostly be met from Brown Field sites. The Local Plan should be reviewed.</p> <p>Wyre Forest Objective Assessment of Housing Need report</p> <ol style="list-style-type: none"> 1. I believe the Wyre Forest Objective Assessment of Housing Need report is flawed. Our population has been virtually static since 1991 (per Local Plan consultation section 2.2). It has only grown since 2001 to 2015 by 2.7% (compared to West Midlands 8.9%). <p>1.1 The Office for National Statistics Sub National Population Projections (SNPP) 2014 evidences a growth in population for the outlook period of 4.7% and a requirement of 199 dwellings p.a. i.e. a reduction of 1818 dwellings over the 18 years bringing the total down from 5400 to 3582. Allowing for some flex and taking “PG-Short-Term” shows a population growth of</p>	<p>Comments noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>5.8% and only a need for 229 dwellings p.a. i.e. a reduction of 1278 dwellings over the outlook period.</p> <p>1.1.1 The plan figure of 300 dwellings p.a. appears to be based on a population growth rate of 7.7% which is a ludicrous 285% higher than the last 14 years which for the UK generally has been driven by immigration which will slow now we have voted for Brexit. One could argue the SNPP figures are too high.</p> <p>1.2 The vacant dwelling rate between 2005 and 2015 (per page 33) has been between 3.5% to 2.6%. The report assumes a vacant dwelling rate of 4.5%. As at 2015 it was 2.6% therefore the report is over egging the figures by 879 dwellings (46260 dwellings x 1.9% [1.9% being the difference between actual 2.6% and the reports assumed 4.5% which has never been reached in the last 10 years]).</p> <p>1.3 Combining 1.1 & 1.2 gives a requirement of only 3243 dwellings over the outlook period and this is based on a growth in population running at 215% more than the current trend with predictions evidencing a slow down in immigration population growth since the vote for Brexit.</p> <p>1.4 Therefore, I recommend Option B is followed but Green Belt is only used after existing Brown Field sites</p>	

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				<p>have been developed.</p> <p>1.5 We were informed that the Council had Brown Field sites for 3000 dwellings so use of Green Belt should be a last resort.</p> <p>1.6 The planners have been misled by this independent report and a further review of Housing Need is required at a reduced level of need.</p> <p>1.7 Appendix A gives further clarification on Housing Needs.</p> <p>Appendix A</p> <p>Wyre Forest Objective Assessment of Housing Need final report April 2017</p> <p>The report suggests an annual dwelling requirement of between 199 and 291 per Table 3.2 with further flexing assuming there is a partial return to 2008 Headship rates giving 239-332 – Table 3.4</p> <p>199 is derived from the Office for National Statistics Sub National Populations Projections (SNPP) 2014 report and the 332 figure from the HH-14 report which is based on partial return to the 2008 headship rates reflective of the different market conditions during the period from which the model was calibrated</p>	

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				<p>i.e. we were in a boom era.</p> <p>Further flex has been given to the model via:</p> <ul style="list-style-type: none"> . PG-Short-Term: with internal and international migration assumptions based on a 6- year (Short-Term) Migration Trend (2009/10–2014/15). The UPC component is included within the historical international migration estimates up to 2011. • PG-Short-Term-X: with internal and international migration assumptions based on a 6- year (ShortTerm) Migration Trend (2009/10–2014/15). The UPC component is excluded from the historical time series of MYE data. • PG-Long-Term: with internal and international migration assumptions based on a 14- year Migration Trend (2001/02–2014/15). The UPC component is included within the historical international migration estimates up to 2011. • PG-Long-Term-X: with internal and international migration assumptions based on a 6- year (ShortTerm) Migration Trend (2001/02–2014/15). The UPC component is excluded from the historical time series of MYE data. <p>I would argue PG-Short-Term data is more</p>	

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				<p>representative of the future as PG –Long-Term data includes the boom of 2001/2 to 2007/8</p> <p>The SNPP 2014 shows a population increase of 4.7% and only a need for 199 dwellings per annum.</p> <p>PG – Short-Term shows a population increase of 5.8% and only a need for 229 dwellings per annum</p> <p>Our population has been virtually static since 1991 (per consultation section 2.2). It has only grown 2.7% since 2001-2015 (compared to the West Midlands of 8.9%) which would suggest both the above figures are on the high side.</p> <p>In the Consultation document Section 6.A 300 dwellings is assumed but if we take PG-Short-Term data showing population increase 5.8% this is still more than double the rate of recent times and requires only 229 dwellings i.e. 1278 less and therefore no need to develop the green belt to the rear of Spennells.</p> <p>The plan figure of 300 dwellings p.a. appears to be based on a population growth rate of 7.7% which is a ludicrous 285% higher than the last 10 years which for the UK generally has been driven by immigration which will slow now we have voted for Brexit. One could argue the SNPP figures are too high.</p>	

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				<p>In The Labour Force and Employment Implications section the unemployment rate is assessed to be fixed between 2020-2034 which is unrealistic as we have always been a boom and bust economy. Therefore the modelling is optimistic (section4.10).</p> <p>Section 4.16 indicates due to ageing population economic activity and employment are projected to decline.</p> <p>Cambridge Econometrics suggest an increase in jobs of 76p.a., Oxford Economics suggest 2p.a. and Experian suggest -61p.a.</p> <p>I think the above results show they can be ignored as they do nothing to inform the process.</p> <p>Section 5 simply recommends 300 dwellings p.a.</p> <p>The vacant dwelling rate between 2005 and 2015 has been 3.5% to 2.6%. The report assumes a vacant dwelling rate of 4.5%. As at 2015 it is 2.6% (page 33) therefore the report is over egging the figures by 879 dwellings (46260 x1.9%).</p> <p>My conclusion is even if we assume the population growth more than doubles when compared to 2001 to 2015 we do not need to develop the fields behind Spennells and additionally the report is over egging</p>	

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				requirements by 879 dwellings once again evidencing no need to use Green Belt at the back of Spennells or in many other locations. Assuming the population growth more than doubles and reducing the vacant dwelling % to current levels indicates a requirement of 3243 dwellings over the outlook period i.e. 180 p.a.	
	LPPO1978	Housing need	Comment	It appears the growth has been over estimated to justify the amount of housing needs over the next few years and into the future.	Comments noted.
	LPPO2105	Housing Need	Object	<p>I am not convinced the amount of homes we need for the Wyre Forest is 6,000. It states in the plan that we have had a static population with quite a large proportion of elderly people. So with this in mind I believe we should only be building what we will need for the next 5 years which is drastically less than 6000.</p> <p>If the plan includes attracting people to move to the area and increase revenue I feel by encouraging businesses, road infrastructure, investment in a fully operational hospital including A&E, two extra Doctor practices, extra schools from primary to secondary, new fire station, an extra 30 police to the area first and then perhaps some of our unemployed in the area will get jobs and be able to afford the houses you are planning to build.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p> <p>The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements for the emerging Local Plan.</p>

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	LPPO2733	6.6 OAHN	Comment	<p>I object to all proposals set out in the Local Plan as I do not consider the assessment of need and calculations contained within the Local Plan to be robust. I appreciate that Local Authorities are finding themselves under increasing pressure, particularly in relation to people resources, however the Local Plan should be of upmost priority and the production a sub-standard and ill-informed statutory document is unacceptable.</p> <p>Purpose of the OAHN document</p> <p>With respect to the first point, the OAHN document has not been produced with the intention of becoming a public facing document. The document produced by Amion Consulting is a classic example of a private consultancy’s technical output to a client (in this case WFDC). I suspect that WFDC have not completed a comprehensive technical review of the document and as such the contents of the document are not fully understood. At the very least, if the OAHN document was intended to become a public facing document then WFDC should have included this in their brief to Amion Consulting. In addition to this, WFDC have also uploaded a substantial amount of supporting “evidence” to their website which is purposely counter- productive because it overwhelms the public with information, rather than providing succinct, well-informed and readable information to inform their</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>response to the Local Plan.</p> <p>Lack of transparency about assumptions</p> <p>The OAHN is not clear about the assumptions that have been applied to conclude with 5,400 houses (300 per annum) needed over the Plan period. In an attempt to better understand the origin of the 5,400 houses, I have completed a review of existing population and housing numbers available from data.gov.uk.</p> <p>Data available from the Office for National Statistics demonstrates that between 1981 and 2015, population growth has at the most experienced a growth rate of 0.6% year on year (see Table 1), but on average the growth rate has been 0.24%. If this average growth is applied to future years, the total population in 2034 is 104,500. This equates to a population increase of 4,600, which is in line with the population projections made in Table 2 and therefore appears to be a sensible assumption. There is also data available on the projected number of households up to the 2034. The household projections demonstrate that between 2016 and 2034, the Local Plan Period, 3,420 additional houses are required, equating to 190 new households per annum.</p> <p>A series of tables with data have been supplied to back</p>	

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				up the statements.	
	LPPO2131	Housing Need	Comment	Is Wyre Forest DC really certain that the need for housing in this area is so great? Or would we be building to encourage people from other areas to move here? That would be good if the areas of Kidderminster and Stourport could sustain so much development, which I do not believe they can.	<p>Comments noted. The proposed development requirement is based on the housing need for the District. This housing need was evidenced in the OAHN study published in April 2017.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO2537	6.6 Housing Need	Object	Both options assume more homes are needed than are I believe are justified. Table 6.0.1 Page 25 says 300 pa. but the Amion report suggests 254 p.a. Also, the Guidance Housing and Economic Development Needs, 2015, states that local councils need only base their assessment on “future scenarios that could reasonably be expected to occur”, not hypothetical future scenarios. The OAHN Report states that the census has measured growth within the Wyre Forest over the past 15 years that may provide a more realistic future scenario.	<p>Objection noted. The OAHN study published in April 2017 stated that 300pda was required over the plan period.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore</p>

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					undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	LPPO2092	Housing Need	Object	<p>The proposal to build up to 6000 dwellings on Green Belt land is unjustifiable when there has been scant growth to Kidderminster’s population. Over the last fifteen years or so, a number of the town’s industries and businesses have closed causing many job losses. This has reduced Kidderminster to a low economy area with many medium to large retail outlets replacing lost businesses. The current economy of the town cannot justify building new homes that will be unaffordable for those who are on low incomes and on the current housing list. Where are the jobs/growth of jobs within Kidderminster to justify the amount of homes proposed?</p> <p>Is this a plan to increase extra funds through the council tax by having an excessive amount of new homes built for the long term? You must take into account the local residents concerns to these unrealistic plans and reconsider prioritising to redevelop the town centre which is long overdue.</p>	The Local Plan Review process doesn’t just allocate sites for housing, it also allocates potential sites for employment to meet its employment land requirement. The Employment Land Review evidence base study sets out what the employment requirement is for the district during the plan period. This evidence base study is used to inform the site allocations in the emerging Local Plan for employment use.
	LPPO3392	Housing need	Comment	I cannot understand why WFDC have opted to propose to build more houses than the Government requires. It is only one of two District Councils in the West	<p>Comments noted.</p> <p>The OAHN follows the guidance for</p>

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				Midlands to have done so. The number of houses being planned is far in excess of even the most optimistic forecasts of future housing needs.	determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	LPPO3265	Housing Need	Object	I imagine that I echo other respondents in urging that brownfield sites be developed before green belt, that the possibility of residential development in the town centre is fully explored, that affordable and social housing which meets the needs of Wyre Forest residents is prioritised, and that due weight is given to potential environmental damage, lack of adequate road capacity, infrastructure and public transport, and the need for adequate provision of community facilities.	Objection noted. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	LPPO4693	6.6 Housing Need	Comment	This plan says more households are needed well above the population increase. This reflects the lack of social cohesion within local families or the justification to	Comment noted. The OAHN follows the guidance for

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				plan for more development than will be needed for local people, and therefore encourage inward migration. If the latter, what is the evidence to support it will be needed.	determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	LPPO4644	6.6 Housing Need	Object	Disagree with projection of number of properties required. Suggest revise number based on experience in Wyre Forest rather than the whole West Midlands with a possible 5 year review to take account of any changes arising due to the economic cycle or Brexit developments.	Objection noted. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	LPPO4639	6.6 Housing Need	Object	Object. Review Local Plan; the Wyre Forest Assessment of Housing Need report is flawed and required 3000 dwellings are can be met from Brown	Objection noted. The OAHN follows the guidance for

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				Field sites.	<p>determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO4660	6.6 Housing Need	Object	<p>I notice from the 'Key Issues' that the population since 1991 had remained static with only an aggregate increase of 2.2.% in the last 24 years. These figures only go up to 2015, has there since been a census for 2015-2017 to see whether the population is in fact increasing at the same rate as the 2 years from 2013-2015? If there is no evidence of such an increase then would the 5,400 not be a little overkill? If between now and 2034 the population increased by 1.1% every 2/3 years, would this not only mean a growth of c6.6%, being 6,567 people and with a national household average of 4, this would only assume c1700-2000 dwellings were required? What is the logic behind the strategy of such a large number of dwellings being required? Similarly, if the population is ageing, should the plans not incorporate the need of this ageing population i.e. ensure low-level housing/ bungalows</p>	<p>The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036. There will be a marked increase in the number and proportion of older residents. The population aged 65+years is expected to increase by 28.1% from 24,200 in 2016 to 31,800 in 2036. (Data based on ONS 2016-based Subnational Population Projections).</p> <p>This suggests that the population is not ‘static’. For further information please see the updated OAHN Study which will be published on the Council’s website during the Pre-Submission consultation.</p>

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				are developed to suit the needs of the elderly (who can live independently in their own homes) and to effectively 'free-up' family homes within already developed areas in order to avoid development for developments sake?	
	LPPO4386	Housing Need Figures	Comment	The housing need figures are questionable and do not necessitate the choice between Option A or B as the additional land take is not required yet.	Comment noted.
	LPPO4446	6.6 Housing Need	Object	<p>Disagree with your calculations that 5000+ houses are needed. Where are all these people coming from? I believe these figures have been grossly inflated, and rounded up time after time, rendering them totally inaccurate. Please see below:</p> <p>HELLA report I have added up the availability presented in the Hella report. This makes for very interesting reading. There are several interesting things about this table:</p> <ol style="list-style-type: none"> 1. If the actual need were less than 3697, no Green Belt land would be required 2. If the actual need were less than 4476, only brownfield Green Belt land would be required 3. 8378 Greenfield Green Belt sites have been identified. This number obviously shows the absolute need to protect the Green Belt immediately and permanently. <p>Rounding – Justification?</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>If the OAHN Report is accepted, then the requirement is calculated at 284 dwellings per year. The Report then rounds up this number to 300 dwellings per year. This simple unjustified action requires the building of 240 houses over the 15-year period</p> <p>In other words, a section of Green Belt land will be used for housing 240 houses purely because of a rounding up. Who does the rounding up benefit? My only conclusion is that it allows the developers to build more executive houses and therefore increase their profits. Why would Wyre Forest District Council take a decision which simply increases the profits of developers? Is the Council not here to serve the residents?</p> <p>Vacancy rate</p> <p>The OAHN Report says that the number of vacant properties in Wyre Forest is 3.2%</p> <p>It says that there are currently 44490 dwellings in Wyre Forest</p> <p>It then increases the allowance for vacant properties to 4.5 %. Whilst the 4.5% figure is taken from the 2011 census, Wyre Forest District Council is legally obliged to use the most up to date data available, i.e., the current Council Tax data. There is no logical reason to use the 4.5% figure instead of 3.2%</p> <p>The difference between 3.2% and 4.5% is 1.3%</p> <p>There are 44490 dwellings in Wyre Forest</p> <p>This means that an extra 44490 x 1.3% dwellings will</p>	

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				<p>be built or 578 dwellings (39 per year). In other words, because the OAHN consultants have chosen, without statistical justification, to increase the vacancy rate by 1.3%, 578 houses will be built on the Green Belt in order to allow for them to remain vacant.</p> <p>The main OAHN calculation of housing requirement. I believe that it is absolutely impossible for a mere mortal to analyse the OAHN Report and discover how the housing requirements were calculated. It is riddled with unexplained acronyms and utter gobbledygook in a way that make it impossible to analyse and challenge.</p> <p>From my experience, I cannot tell whether this is a deliberate attempt to baffle residents of Wyre Forest or just because consultants are masters at making things as complicated as possible to justify their excessive charges.</p> <p>To bring a level of sanity to the calculations I have tried to replicate the calculations using data provided by the OAHN report.</p> <p>I have looked at 2 population growth figures, 8.2 % which is a national average that obviously doesn't apply to Wyre Forest, and 2.1% which is the actual growth figure of population in Wyre Forest since 2001. Whilst I have used this figure it is my understanding that the population growth was all weighted to before 2011 and there has been nil growth since 2011. The figures also make no attempt to factor in potential</p>	

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				<p>population decline as the considerable number of European citizens in Wyre Forest falls post Brexit. I will try to explain my calculations as I do them:</p> <p>Latest population figure for Wyre Forest: 98960 Number of occupied dwellings: 43086 Average number of occupants per dwelling (98960/43086): 2.2968 (note: I have not made any attempt for allowing this average to decrease) Population Growth 2.1% Population growth 8.2% Population Growth from 98960 to 2078 or 8114 Dwellings required (growth divided by 2.2968) 904 or 3533 Dwellings per year (over 15 yrs) 60 or 235</p> <p>As a check as to whether my calculations work, if I add together the increased number of houses to be left vacant and the houses required for increased population at 8.2% it comes to 235 + 39 = 274 per year. This is so close to 284 that I feel that my simplistic calculation is somewhat less flawed than the number by which the consultants have rounded their calculation up.</p> <p>Conclusion The figures used to calculate the housing requirement have been deliberately maximised to produce the highest possible number of houses required.</p>	

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				<p>There is absolutely no need to round the figures upwards.</p> <p>The use of 4.5% vacancy is out of date and should not have been used.</p> <p>The population growth figure taken by the OAHN has no basis in the reality of Wyre Forest. 2.1% is a far more realistic figure.</p> <p>This means that the housing requirement over the 15 year period of the local plan is far closer to 904 than 6000. The plan is totally flawed and must be totally withdrawn. There is absolutely no requirement to build on the Green Belt in Wyre Forest.</p>	
	LPPO4488	Housing Need	Object	<ul style="list-style-type: none"> Plans are overstating the need for new housing. The housing needs report states that the reason for so much housing is to attract overspill from surrounding areas to solve the issues there - not really 'local'. 	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>
	LPPO4914	6.6	Object	The Wyre Forest Assessment of Housing Need report is flawed and only just over 3000 dwellings are required	Objection noted.

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				<p>which can mostly be met from Brown Field sites. The Local Plan should be reviewed.</p> <p>Wyre Forest Objective Assessment of Housing Need report</p> <ul style="list-style-type: none"> • I believe the Wyre Forest Objective Assessment of Housing Need report is flawed. Our population has been virtually static since 1991 (per Local Plan consultation section 2.2). It has only grown since 2001 to 2015 by 2.7% (compared to West Midlands 8.9%). • The Office for National Statistics Sub National Population Projections (SNPP) 2014 evidences a growth in population for the outlook period of 4.7% and a requirement of 199 dwellings p.a. i.e. a reduction of 1818 dwellings over the 18 years bringing the total down from 5400 to 3582. Allowing for some flex and taking “PG-Short-Term” shows a population growth of 5.8% and only a need for 229 dwellings p.a. i.e. a reduction of 1278 dwellings over the outlook period. • The plan figure of 300 dwellings p.a. appears to be based on a population growth rate of 7.7% which is a ludicrous 285% higher than the last 14 years which for the UK generally has been driven by immigration which will slow now we have voted for Brexit. One could argue the 	<p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>SNPP figures are too high.</p> <ul style="list-style-type: none"> • The vacant dwelling rate between 2005 and 2015 (per page 33) has been between 3.5% to 2.6%. The report assumes a vacant dwelling rate of 4.5%. As at 2015 it was 2.6% therefore the report is over egging the figures by 879 dwellings (46260 dwellings x 1.9% [1.9% being the difference between actual 2.6% and the reports assumed 4.5% which has never been reached in the last 10 years]). • Combining 1.1 & 1.2 gives a requirement of only 3243 dwellings over the outlook period and this is based on a growth in population running at 215% more than the current trend with predictions evidencing a slow down in immigration population growth since the vote for Brexit. • It was confirmed that the Council had Brown Field sites for 3000 dwellings so use of Green Belt should be a last resort. • The planners have been misled by this independent report and a further review of Housing Need is required at a reduced level of need. <p>Appendix A gives further clarification on Housing Needs.</p>	

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				<p>Appendix A</p> <p>Wyre Forest Objective Assessment of Housing Need final report April 2017</p> <p>The report suggests an annual dwelling requirement of between 199 and 291 per Table 3.2 with further flexing assuming there is a partial return to 2008 Headship rates giving 239-332 – Table 3.4</p> <p>199 is derived from the Office for National Statistics Sub National Populations Projections (SNPP) 2014 report and the 332 figure from the HH-14 report which is based on partial return to the 2008 headship rates reflective of the different market conditions during the period from which the model was calibrated i.e. we were in a boom era.</p> <p>Further flex has been given to the model via:</p> <ul style="list-style-type: none"> . PG-Short-Term: with internal and international migration assumptions based on a 6- year (Short-Term) Migration Trend (2009/10–2014/15). The UPC component is included within the historical international migration estimates up to 2011. • PG-Short-Term-X: with internal and international migration assumptions based on a 6- year (ShortTerm) Migration Trend 	

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				<p>(2009/10–2014/15). The UPC component is excluded from the historical time series of MYE data.</p> <ul style="list-style-type: none"> • PG-Long-Term: with internal and international migration assumptions based on a 14- year Migration Trend (2001/02–2014/15). The UPC component is included within the historical international migration estimates up to 2011. • PG-Long-Term-X: with internal and international migration assumptions based on a 6- year (ShortTerm) Migration Trend (2001/02–2014/15). The UPC component is excluded from the historical time series of MYE data. <p>I would argue PG-Short-Term data is more representative of the future as PG –Long-Term data includes the boom of 2001/2 to 2007/8</p> <p>The SNPP 2014 shows a population increase of 4.7% and only a need for 199 dwellings per annum.</p> <p>PG – Short-Term shows a population increase of 5.8% and only a need for 229 dwellings per annum</p> <p>Our population has been virtually static since 1991 (per consultation section 2.2). It has only grown 2.7% since 2001-2015 (compared to the West Midlands of 8.9%) which would suggest both the above figures are on the</p>	

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				<p>high side.</p> <p>In the Consultation document Section 6.A 300 dwellings is assumed but if we take PG-Short-Term data showing population increase 5.8% this is still more than double the rate of recent times and requires only 229 dwellings i.e. 1278 less and therefore no need to develop the green belt to the rear of Spennells.</p> <p>The plan figure of 300 dwellings p.a. appears to be based on a population growth rate of 7.7% which is a ludicrous 285% higher than the last 10 years which for the UK generally has been driven by immigration which will slow now we have voted for Brexit. One could argue the SNPP figures are too high.</p> <p>In The Labour Force and Employment Implications section the unemployment rate is assessed to be fixed between 2020-2034 which is unrealistic as we have always been a boom and bust economy. Therefore the modeling is optimistic (section4.10)</p> <p>Section 4.16 indicates due to ageing population economic activity and employment are projected to decline.</p> <p>Cambridge Econometrics suggest an increase in jobs of 76p.a., Oxford Economics suggest 2p.a. and Experian</p>	

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				<p>suggest -61p.a.</p> <p>I think the above results show they can be ignored as they do nothing to inform the process.</p> <p>Section 5 simply recommends 300 dwellings p.a.</p> <p>The vacant dwelling rate between 2005 and 2015 has been 3.5% to 2.6%. The report assumes a vacant dwelling rate of 4.5%. As at 2015 it is 2.6% (page 33) therefore the report is over egging the figures by 879 dwellings (46260 x1.9%).</p> <p>My conclusion is even if we assume the population growth more than doubles when compared to 2001 to 2015 we do not need to develop the fields behind Spennells and additionally the report is over egging requirements by 879 dwellings once again evidencing no need to use Green Belt at the back of Spennells or in many other locations. Assuming the population growth more than doubles and reducing the vacant dwelling % to current levels indicates a requirement of 3243 dwellings over the outlook period i.e. 180 p.a.</p>	
	LPPO4823	6.6 - Housing Need	Object	<p>The OAHN report which was used by the council to arrive at the number of houses needed states that the census is a relevant source, which would be the most accurate measurement of growth within the Wyre Forest over the past 15 years. It then ignores it and</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be</p>

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				<p>instead uses arbitrary national and regional figures to arrive at the final growth rate. The plan figure of 300 houses per year would equate to a population growth of 7.7%, where the actual rate for this area is 2.7% (2001-2015). Wyre Forest has a population growth below the national average and within the guidance on the Housing and Economic Development Needs Assessments 2015, it states that ‘assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur’. This is not therefore a requirement to build more houses than actually needed. The Council’s own document at 6.1 is seeking a ‘...pro-growth agenda’ and if that pro-growth element is also taken out of the council’s figures together with a reduction for lower immigration following Brexit, we would be looking at a substantially reduced figure of possibly 3500 houses. Catering for population growth over and above that which is actually required is wrong, especially when it involves using Green Belt or potentially affects SSSIs.</p>	<p>updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO4827	6.6 Housing Need	Object	<p>Questions the OAHN which assumes a need for 5400 new homes in the period up to 2034. The report is based on population growth of 5.8%, twice the growth of 2.7% experienced over the period 2001-15. It also assumes a void dwelling rate of 4.7% whereas the actual in the District in 2015 was 2.6%. If the actual</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and</p>

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				<p>void rate was adopted this would reduce the requirement by nearly 900 dwellings.</p> <p>Due to the aging population of Wyre Forest the workforce over the period is likely to fall. The proportion of the population of Wyre Forest aged over 65 is 23.4% (national average 17.6%). The aging population is also likely to free up a large amount of the existing housing stock. Has this factor been taken into consideration?</p> <p>Section 6.8 refers for the need of the Plan to be prepared in consultation with neighbouring Housing Market Areas. There is concern that as the WFDC is a member of Greater Birmingham and Solihull Partnership and getting funding from the LEP. The LEP will in return ask Wyre Forest to provide housing to alleviate the severe housing pressures in the Birmingham HMA. The Greater Birmingham and Solihull Local Enterprise Partnership is already substantially funding the improvement to Kidderminster station.</p> <p>We need clarity on what specific agreements exist between Wyre Forest DC and Greater Birmingham and Solihull Local Enterprise Partnership to contribute housing supply to meeting that areas housing shortfall.</p> <p>Greater outward commuting to Birmingham and the</p>	<p>PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>Black Country is only likely to lead to increased congestion without substantially improved road links. In addition there would be further strain on the health and education infrastructure of the Wyre Forest.</p> <p>The assumptions of Housing Need should be scrutinised as there appears to be flaws in the document particularly as to projected population growth rates in the light of past trends and also assumptions as to housing void levels. A clear statement of overspill provision and policy in regard to the Greater Birmingham and Solihull LEP Housing needs to be set out.</p>	
	LPPO4826	6.6 - Housing Need	Object	<p>The recent march to the Kidderminster Town Hall made by Wyre Forest residents on 4th August demonstrates the strong feeling there is against many aspects of the Local Plan. The OAHN report which was used by the council to arrive at the number of houses needed states that the census is a relevant source, which would be the most accurate measurement of growth within the Wyre Forest over the past 15 years. It then ignores it and instead uses arbitrary national and regional figures to arrive at the final growth rate. The plan figure of 300 houses per year would equate to a population growth of 7.7%, where the actual rate for this area is 2.7% (2001-2015). Wyre Forest has a population growth BELOW the national average and within the guidance on the Housing and Economic</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>

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				<p>Development Needs Assessments 2015, it states that ‘assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur’. This is not therefore a requirement to build more houses that actually needed. The council’s own document at 6.1 is seeking a ‘...pro-growth agenda’ and is that pro-growth element is also taken out of the council’s figures together with a reduction for lower immigration flowing brexit, we would be looking at a substantially reduced figure of possibly 3500 houses.</p> <p>We and many other feel that catering for population growth over and above that which I actually required is wrong, especially when it involved using greenbelt for it and such developments could potentially affect some sites of special scientific interest (development around Hurcott, for example)</p>					
	LPPO4752	6.6 Housing Need	Object	<p><u>Objective: To determine how many housing units are required.</u></p> <p>Figures provided by the Council allege that 6,000 additional units are required during the period of the Plan. These have been allocated as follows:</p> <table data-bbox="792 1244 1473 1386"> <tr> <td>Brownfield sites</td> <td>2950</td> </tr> <tr> <td>Greenfield sites (excluding the Green Belt)</td> <td>350</td> </tr> </table>	Brownfield sites	2950	Greenfield sites (excluding the Green Belt)	350	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published</p>
Brownfield sites	2950								
Greenfield sites (excluding the Green Belt)	350								

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				<p>Greenfield sites in the Green Belt (Core Site) 1900</p> <p>Other (Option A - entirely Green Belt or Option B – Green Belt Outside the Green Belt) 1100 / 750 / 550</p> <p>Totals 1300 / 6300 / 6500</p> <p>N.B. These figures do not make sense and the conclusion is therefore illogical. Option A produces a total of 6300 additional units and Option B a total of 6500, whereas the required number, according to information provided by the Council, is 6,000 (which in itself is considerably more than the number initially indicated) - a discrepancy in the Council’s own calculations of either 300 or 500 (unrequired) units.</p> <p>A realistic reassessment of the number of housing units planned for Wyre Forest should now be completed. This should not be influenced by (1) pressure from developers and/or other local authorities, (2) political considerations, (3) convenience/relatively low cost of developing ‘open’ land or (4) the opportunity to make ‘quick money’ from the ‘new homes bonus’ promised by the Government, which takes no consideration of actual need. None of these influences should have any</p>	<p>their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology. 1100</p>

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				<p>bearing on the calculation.</p> <p>If Councils wish to protect Green Belt, they do have scope to reduce housing numbers, according to research carried out by the Campaign to Protect Rural England. The Council must justify its 'housing need' figures.</p> <p>The Council has potentially over-estimated the number of affordable units required in Wyre Forest. Inwards migration from the West Midlands conurbation has significantly reduced in recent years, possibly as the result of substantially increased transport costs. A calculation will presumably have been based on existing requirements and will take no account of probable depopulation of young people from an area which, despite determined efforts, has been unable to attract industry or commerce and particularly to its town centres; nor will account have been taken of the potential effects of Brexit.</p> <p>Future housing requirements, as assessed by the Council, do not appear to have taken consideration of the availability of a substantial number of houses, when residents determine to sell up and move out of the district. This will happen, as a direct consequence of the Council's proposed development of Spennells as an urban sprawl/mega-estate and the expectation of a dramatic deterioration of quality of life. This would</p>	

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				<p>significantly reduce the requirement for new build units.</p> <p>Future housing and infrastructure needs have probably been significantly over-estimated. Outward movement of population, particularly of young people should be taken into account, as should the probable/potential effects of Brexit.</p>	
	LPPO4775	6.6 Housing Need	Object	<p>The population projection in the Draft Local Plan is exaggerated and a realistic requirement of 3,000 homes to 2034 can be met on brownfield sites – thereby avoiding encroaching on Green Belt during this period.</p> <p>Should the need for housing still be accepted to be 6,000, brownfield sites should be used first, as the Council only needs to guarantee an ongoing 5 year housing supply.</p> <p>Population Growth Projection and Housing Need: The guidelines set out in the National Planning Policy Framework states that we should consider only future scenarios that could reasonably be expected to occur. The population of the Wyre Forest has only grown slightly since 1991 and remains fairly static. After a decade with a population increase of only 1.1% between 2001 and 2011, the population then only increased by a further 1.1% from 2013 to 2015. This</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>equates to a 2.7% increase in population growth from 2001 to 2015 (point 2.3 of the Objective Assessment of Housing Needs 'OAHN' Report May 2017).</p> <p>The National Statistics Sub National Population Projections (SNPP) 2014 evidences a growth of population for the outlook period at 4.7% with a requirement of only 199 dwellings per annum. This is significantly less than the projection in the WFDC Local Plan Review which states the need of 300 dwellings per annum (this must be based on a 7.7% increase). This would give us a 285% higher rate of growth than in the last 10 year period which is completely improbable.</p> <p>If we used the SNPP recommendations for building 199 dwellings per annum over the stated 15 year period, we only need to build 2,985 dwellings in total - which negates the need to take Green Belt land around the District and reduces the WFDC consultation figures by 2,415 houses.</p> <p>The consultation document (section 6A) assumes 300 dwellings per annum should be required, but even the PG Short Term Data shows an increase of 5.8% which is twice the growth of the last 15 year period and still only has a need for 229 dwellings per annum. This is 1,278 dwellings less than currently assumed.</p> <p>No allowance has been made for the age profile of the Wyre Forest population leading to increased mortality rates and hence increased availability of property in the district. It is likely that many properties will come</p>	

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				<p>free over the next 15 years as people downsize, move to care homes, live with children outside the area or die.</p> <p>I firmly believe that growth figures will be less than 5.8% based on national projections and taking account of the recent cutbacks in the carpet industry in Kidderminster. Along with the forthcoming government attempts to reduce immigration, this will bring the figure close to the 2.7% experienced over the last 15 years.</p> <p>The OAHN Report says that the number of vacant properties in the Wyre Forest is 3.2% and that there are currently 44,490 dwellings in the area. The Report increases the allowance for vacant properties to 4.5%. Increasing the vacancy rate by 1.3% means that the housing demand has been unnecessarily increased by 578 dwellings (or 39 per annum).</p> <p>Consequently, the need for new dwellings in Wyre Forest up to 2034, will realistically be under 3,000 and therefore the need to use any Green Belt land is unnecessary.</p> <p>A realistic requirement of 3,000 homes to 2034 can be met on brownfield sites.</p> <p>According to the statistics on page 39, there is a total of 967 dwellings completed or with planning permission granted on brownfield sites, with a further 1,193 proposed by the plan on other brownfield sites.</p>	

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				<p>350 dwellings are also proposed on greenfield sites not in the Green Belt and 796 dwellings can be placed on previously built Green Belt land including 600 of these at Lea Castle. This makes a total of 3,306 dwellings. This exceeds the number of houses needed for the 15 year land supply (when using the SNPP figures of 199 p.a. as detailed in 1c above) without the need to use Green Belt at all.</p>	
	LPPO4788	6.6 Housing Need	Object	<p>Revisit WFDC’s figures for projected housing requirements in Kidderminster as the figures do not equate with WFDC review which quotes “<i>virtually static</i>” growth in the local population.</p> <p>The Amion Report on which figures are based states that the number of houses it recommends per year (which is 254 not 300 as WFDC) would be “<i>capable of absorbing the scale of numbers likely to be involved</i>” in “<i>an identified shortfall of provision in the Greater Birmingham HMA</i>”.</p> <p>Without this provision to accommodate Birmingham overspill the figures required for future growth in Kidderminster would be lower and could be addressed via use of Brownfield sites.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO4800	6.6 Housing need	Object	<p>The data put forward by WFDC in terms of future housing requirement is in direct contradiction of the actual population growth recorded over the recent decade. The actual population has risen at a much</p>	<p>Objection noted.</p>

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				lower rate than the forecast for future housing would have us believe.	
	LPPO4836	6.6 Housing Need	Object	<p>Although the DCLG Housing statistical release dated 12 July 2016 has a projected national increase in the number of households of 19% between 2014 and 2034 the population of Wyre Forest District rose by 1.1% between 2001 and 2011 and has remained fairly constant since 2011. Although projected population increase lags behind projected households it is not clear that there will be a demand for an additional 6000 houses in Wyre Forest by 2034 unless it is coming from elsewhere.</p> <p>I am not aware of the reasoning for the need for more housing in Wyre Forest where the population has been stable for some years. Obviously there must be some, but as a dormitory estate for Birmingham and the Black Country it calls into question incompatible requirements with respect to sustainable development.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO4882	6.6 Housing Need	Object	<p>Having reviewed extensive report prepared by WFDC, it presents numerous facts and figures, based on 'independent' assessments including OAHN report (estimating how many houses might be needed), however, it seems to have significantly exaggerated the number of new houses actually required, which would then encroach onto Green Belt sites, when compared with the HELAA report. The HELAA tables A-I</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was</p>

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				<p>show 4475 available sites before using Green Belt. And table J - Green Belt greenfield sites 2278.</p> <p>Future Requirements:</p> <ol style="list-style-type: none"> 1. OAHN Report (SNPP-2014 figures) calculates that 199 houses per year (for 18 years) are required(= 3,582). 2. The Planning Review states 300 house <i>pa</i> (= 5,400), which appears to be based on a population growth (PG) in excess of 8.1% (PG-Long-Term-X). Why plan to build an extra 1,818 dwellings, when it is not required? 3. Your review is using PG assumptions that are not relevant to the real expectation and requirements of this area. 4. There are currently 46,260 properties in WFDC (in 2015- Table 6.1). The OAHN reports states a vacant property rate of 2.6% (= 45,044 occupied vs 1216 unoccupied houses). Why can't we use these unoccupied houses? <p>Population Growth</p> <ol style="list-style-type: none"> 1. Since 2001, this has grown 2.7% in Wyre 2. This compares with a national average in England of 10.8% (hence not relevant to our area) 3. SNPP-2014 figures predict a PG of 4.7%, this is 	<p>consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>

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				<p>almost double the historical figure.</p> <ol style="list-style-type: none"> 4. The effect of Brexit, is likely to mean that this will fall further (assuming that some of our European population will go back to their homeland). 5. Wyre Forest has a current population of 99,503 6. If we predict that the next 18 years will bring the same PG (although in reality it is likely to be less), then this is an extra $(99,503 \times 2.7\%) = 2,686$ people by 2034. 7. The average no of people per household is 2.2 people per house. 8. Based on a PG of 2.7%, this means that we would need 1,221 extra houses during the next 18 years. 9. Based on a PG of 4.7%, this means that we would need 2,126 extra houses in the next 18 years. <p>Realistic Requirements Compared to WFDC Planning Review 2016-203</p> <p>To summarise Population Growth and Housing Requirement</p> <ul style="list-style-type: none"> • Your WFDC Planning Review requires 5,400 homes (300 p/a). • SNPP-2014 figures estimates that 3,582 are 	

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				<p>required (199 p/a)</p> <ul style="list-style-type: none"> • If PG is estimated at 4.7% (SNPP-2014), we would require 2,126 homes. • If PG is estimated at 2.7% (historical), we would require 1,221homes. • Compared with the SNPP-2014 figure you have over stated the amount housing required by at least an extra 1,818 homes. <p>To summarise site availability within the WFDC area:</p> <ul style="list-style-type: none"> • There are 4,475 sites available before you need to use Green Belt green field land (ref HELAA report). • We already have 1,216 unoccupied houses (OAHN report) • Non Green Belt 4,475 +unoccupied 1,216 = 5,691 total availability, this even meets your exaggerated figure of 5,400, hence Green Belt greenfield sites are not required to be built on, to meet the extra housing required. 	
Hardwick & Prosser	LPP0720	6.6 Housing need	Comment	The draft policy appears to fail to deal with any issues of unmet housing need from the wider area and/or neighbouring authorities. There should be provision for adjustment of figures to allow the Local Plan to effectively address any issues which arise and a commitment to meeting the specified housing	Although Wyre Forest District is its own housing market area, WFDC continues to undertake Duty to Cooperate discussions with its neighbouring Local Authorities during the Local Plan Review process to ensure NPPF

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				<p>requirements by the end of the plan. Ideally the a local authority should be treating housing requirements for the area as a minimum and commit to fulfilling the requirements by 2034 to in order to boost housing supply as is a requirement within the NPPF. The plan should demonstrate that minimum targets should be met and exceeded during the plan period as well as continuing to keep an up to date five year housing land supply. There should ideally be a policy within the Local Plan which sets out measures to ensure that the latter is sustained and not simply state that “sufficient” land will be provided to meet such needs.</p>	<p>requirements are met.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<p>LPPO478</p>	<p>paragra ph.6.6</p>	<p>Comment</p>	<p>I do not believe that Wyre Forest District needs 300 more properties per annum. Also as there is a need for 540 elderly persons accommodation, I believe that a development like some of the developments in Birmingham which are more like village communities where there is a Doctors surgery on site would be more suitable on the Lea Castle Hospital site than 600 houses/flats.</p>	<p>Comments noted.</p>
	<p>LPPO2006</p>	<p>Housin g Need</p>	<p>Object</p>	<p>The Wyre Forest population growth is below national average I quote "Assessing development needs should be proportionate and doesn't require local councils to consider purely hypothetical future scenarios only future scenarios that could be reasonably expected to occur". The Plan refers to virtually static population growth...are we therefore being asked to be an overspill from the Birmingham conurbation? The town</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was</p>

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				is full of empty shops, we need to look at this for our own town before we start housing for another area? We do need better housing for some, new start homes but with so many brown field sites in this area this can be accommodated without touching very precious Green Belt. The suggested demand does not exist.	consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	LPPO1940	Housing Needs	Comment	I believe that there are miscalculations concerning the number of houses required in this area, the population of this area has remained fairly static in recent years, the growth of population appears to be exaggerated and does not seem to be based on evidence. Is it practice to overestimate numbers so that they might be reduced in the future giving the appearance of giving some concession to the public?	<p>The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036. There will be a marked increase in the number and proportion of older residents. The population aged 65+years is expected to increase by 28.1% from 24,200 in 2016 to 31,800 in 2036. (Data based on ONS 2016-based Subnational Population Projections).</p> <p>This suggests that the population is not 'static'. For further information please see the updated OAHN Study which will be published on the Council's website during the Pre-Submission consultation.</p>
	LPPO2172	Housing Need	Comment	I would also challenge the population forecast in this review as the Worcestershire County Council web site states that the population growth in this area has grown by 1200 people between 2001 and 2012. Is there a demand for the proposed number of houses?	Comments noted. The proposed development requirement is based on the housing need for the District. This housing need was evidenced in the OAHN study published in April 2017.

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				As it is at the moment we have a town centre that is in decline with many empty shops and industry cutting jobs. Who would want to move into a town as it is at the moment?	Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	LPPO2185	Housing Need	Comment	I do not believe the numbers of proposed growth within Wyre forest require the need for the number of homes provided.	Comments noted.
	LPPO2348	Housing Need	Object	<p>We believe the proposed build of 6000 units is excessively ambitious and consider hardly any Green Belt needs be touched.</p> <p>WFDC assessment of the housing needs looks quite flawed and we believe the numbers in the report cannot be substantiated. We think the requirement for accommodation will be in the region of 3000 not 6000 units. 3000 units can be completely be accommodated within Brown Field sites without the vast removal of swathes of the Green Belt.</p> <p>The WFDC Local Plan is flawed and should be reviewed, revised and if required withdrawn.</p> <p><u>Wyre Forest Objective Assessment of Housing Need report</u></p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				<p>1. We believe the Wyre Forest Objective Assessment of Housing Need (OAHN) report is flawed, not fit for purpose and not objective. Our population has been virtually static since 1991 (confirmed by the Local Plan consultation section 2.2). It has only grown since 2001 to 2015 by 2.7% (compared to West Midlands growth of 8.9%). The population of Kidderminster in 2015 is stated to be 56,185, (55,530 in the 2011 census). This local plan allows for an increase of over 18,000 people in the area, a massive increase in local population. This increase is certainly not from organic growth so where are the additional people coming from and what would attract them to the area? One can only assume that they will be coming into the area from further afield.</p> <ul style="list-style-type: none"> ○ The ONS Sub National Population Projections (SNPP) 2014 evidences a growth in population for the outlook period of 4.7% and a requirement of 199 dwellings p.a. i.e. a reduction of 1818 dwellings over the 18 years bringing the total down from 5400 to 3582. Allowing for some flexibility shows a population growth of 5.8% and requires 229 dwellings p.a. i.e. a reduction of 1278 dwellings over the 	

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				<p>outlook period.</p> <ul style="list-style-type: none"> ○ The plan figure of 300 dwellings p.a. appears to be based on a population growth rate of 7.7% which is a ludicrously 285% higher than the last 14 years which for the UK generally has been driven by immigration which will slow now the UK is leaving the EU. One could argue the SNPP figures are too high. ○ The vacant dwelling rate between 2005 and 2015 (OAHN page 33) has been at its highest 3.5% (2007, 2008, 2009) to its lowest 2.6% (2015). The report assumes a vacant dwelling rate of 4.5%. As at 2015 it was 2.6% therefore the report is over egging the figures somewhat by 879 dwellings (Total dwelling stock of 46260 dwellings x 1.9% (1.9% being the difference between actual 2.6% and the reports assumed 4.5% which has never been reached in the last 10 years). ○ Considering the above gives a requirement for 3243 dwellings over the outlook period 2016 – 2034 but based on a growth in population running at 215% more than the current 	

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				<p>trend with predictions evidencing a slowdown in immigration population growth since the vote to leave the EU.</p> <ul style="list-style-type: none"> ○ If the current trend of around 2.6% growth is followed, the accommodations to be provided is around 3000 dwellings in the outlook period. ○ We recommend Option B is followed but the numbers are reduced and Green Belt need not be used, see the table on page 6. Brownfield sites should be developed first. ○ The HELAA report indicating availability of land to build upon highlights some inconsistencies and proves that no Green Belt land needs to be built upon: <p>Table No</p> <p>Type of Development in WFDC</p> <p>A Sites under construction at 01/04/16 – Large S</p> <p>B Sites with non-implemented planning permiss</p> <p>C Other deliverable sites within 5 years</p> <p>D Urban Brownfield Sites delivered beyond 5 ye</p> <p>E Urban Greenfield Sites deliverable beyond 5 y</p> <p>F Rural Brownfield Sites deliverable beyond 5 ye</p>	

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response						
				<p>G Rural Greenfield Sites deliverable beyond 5 years</p> <p>H Green Belt Brownfield Sites deliverable beyond 5 years</p> <p>I Green Belt Greenfield Sites deliverable beyond 5 years</p> <p>Sum A – F and this delivers 3015 units, exceeding the requirement of 3000 in section 1.5 above; then no Green Belt land is touched at all.</p> <p>Sum A – G, including now the Rural Greenfield Sites and this delivers 3696 units, well in excess of the requirements in section 1.4 above.</p> <p>Sum A – H, including now the Green Belt Brownfield Sites and this delivers 4475 units, well in excess of the requirements in section 1.4 above.</p> <p>No Green Belt Greenbelt Greenfield Sites need to be considered.</p> <ul style="list-style-type: none"> The planners should not be misled by the OAHN report and a further more realistic review of housing needs is required. 	<table border="0"> <tr> <td style="text-align: right;">681</td> <td style="text-align: right;">3696</td> </tr> <tr> <td style="text-align: right;">779</td> <td style="text-align: right;">4475</td> </tr> <tr> <td style="text-align: right;">8377</td> <td style="text-align: right;">12852</td> </tr> </table>	681	3696	779	4475	8377	12852
681	3696										
779	4475										
8377	12852										
	LPPO1843	Housing Need	Object	The figures which have been quoted for the requirement for future housing needs do not agree with known figures projected from census figures. The Council do not quote their data source used for	The Objectively Assessed Housing Needs (OAHN) Study is the evidence base for the housing requirement.						

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				<p>predictions therefore one can only assume that these are incorrect and vastly inflated, and all future needs can be met from the use of brownfield site development.</p>	<p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<p>LPPO2782</p>	<p>Housing numbers</p>	<p>Object</p>	<p>It is self- evident that the Plan assessment of housing needs has been based on a projection of population growth that is not borne out by the Government’s Office of National Statistics projection for the Wyre Forest. The latter show that over the planning period the population of Wyre Forest will increase approximately by only 5% from 99,000 in 2016 to 104,000 in 2034. However the Planners have accepted, without apparently questioning, the higher projection given by the Amion and Edge Consultants i.e.: 8.1% growth, a degree of growth that has never been achieved in the Wyre Forest.</p> <p>This difference in projected population growth will impact on the number of dwellings required to be</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>built. Based on 5% the annual requirement would be 199 dwellings - a total of only 3582 over the planning period — but based on 8.1% the annual requirement is raised to 291 dwellings — a total of 5238 over the planning period. Over and above this, the Plan has added more contingency to the latter figure raising the number of dwellings at first to 5400 and then again to 6(X)0, an increase of nearly 2500 (+67°Ai) over the SNPP —2014 figure of 3582.</p> <p>There is also an ageing population in Kidderminster so it is reasonable to assume that as old people downsize; move into care homes; move outside the area to be nearer to family; or sadly die, more vacant properties should become available in the Plan period under review.</p> <p>It is also important to note that in the Worcestershire Local Transport Plan 2017 2030, dated as recently as December 202016, it stated that “The Wyre Forest District Site Allocations and policies local Plan 2006-2026 seeks to allocate 4000 dwellings from 2006 to 2026. However, as of April 2013, 2869 homes have already been supplied, therefore only 1131 are required to be built up until 2026.” This makes the figures quoted in the local Plan Review even more questionable.</p> <p>If Planning is assuming that the increase in population</p>	

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				<p>is because Wyre Forest (and Kidderminster in particular) is being designated as a catchment area for potential over spills of population from Birmingham and Solihull then such an objective should have been clearly stated in the Plan so that a full consultation on this disturbing issue can be made.</p>	
	<p>LPPO3710</p>	<p>Paragraph 6.6</p>	<p>Object</p>	<p>Overall (my comments on more specific areas of the report are provided after this initial comment below)</p> <p>The Objective Assessment of Housing Need (OAHN) which underpins the Local Plan Review (LPR) has weaknesses and is not wholly objective. I therefore object to the number of houses proposed as the figure is much higher than necessary. With this in mind, the amount of green belt proposed to be consumed is needless.</p> <p>At OAHN Appendix G stage 1 the figure of 1,726 for current need is based upon assumptions at G2.5 and G2.6 and the overall figure is based upon a grossed-up breakdown from a sample of just 39% of the housing register.</p> <p>These assumptions erode confidence of the proposed scale of development and so object to this.</p> <p>At G2.7 a claim is made that ‘Having established the scale of need in Steps 1.1, 1.2 and 1.3, total current</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>housing need from existing households across Wyre Forest ... is 2,245' is completely unsound and unjustified. There is no clear line of sight as to how this figure has been obtained from objective evidence and therefore the OAHN is flawed. There is no objective establishment of the scale as incorrectly claimed within the statement. Furthermore, there is no clear line of sight as to how the figure of 76.9% has been shown to be derived and what lower quartile house prices figure has been used in this calculation.</p> <p>At G2.2 the OAHN states that the scale of need by homeless 'households can be derived from several sources', but it is not clear which source has been used for the figures within the report nor whether the 68 households quoted separately have been double counted within this assessment.</p> <p>At G3.2 I do not see a right to those that have made a free decision to form a new household for the costs involved to be picked up by the tax payer with free accommodation. It is clear that the households should not be formed unless they can live within their means and do not burden the community with cost. The situation is of their own making and so can be dealt with by staying with family and friends. The statement that 'The housing register reports a total of 574 newly-forming households...' is inconsistent with statements made at G1.4 where the figure has actually been</p>	

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				<p>grossed up from a breakdown derived from 1305 households on the register. There is scope for this figure of 481 households to be reduced here.</p> <p>At G4.4 the OAHN states that 2% vacant stock is acceptable. I object to this number as this is valuable inefficient use of housing stock. Ordinary households manage to move home without there have to be a stock of vacant property so why shouldn't the Council be able to operate at this efficient level? This would reduce the pressure in green field development and is not justified. A figure should be included at stage 3.2.</p> <p>At G4.5 the OAHN includes objective data over the period April 2010 to Sept 2015 that reduced the overall imbalance to 120 each year yet has not been taken into account within the assessment due to the numbers being a prediction. I object because this approach is inconsistent with the rest of the report where most of it is a prediction through to the year 2034. At just 120 affordable dwellings – this can be accommodated within current brownfield and other inner town sites that do not involve building on green field. A figure should be included at Stage 3.3.</p> <p>At G4.7 the OAHN assumes that 1192 affordable rented dwellings are available over the five-year period yet G4.5 is inconsistent with having a prediction not</p>	

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				<p>included within the modelling work.</p> <p>Stage 3 does not take into account of the 1201 existing households living in other tenures. This is clearly a dwelling supply and should be taken into account. The 1192 figure should therefore be considerably increased. The annual supply has been artificially reduced in the OAHN and should be revised, therefore I object.</p> <p>At G4.9 again, an assumption is made for the annual capacity of new tenant lets yet G4.5 makes no comparable assumption for consistency. If an assumption can be drawn at G4.9 then an assumption can similarly be drawn at G4.5. Therefore I object.</p> <p>At paragraph 5.3 within the OAHN, this solely refers to the Edge Analytics in drawing to conclusion the housing need referring to Fig 4.10. The assumptions embedded within the Edge Analytics is upper-bound and does not reflect previous historical performance of the town that is the norm for the size, location, setting and environment of the district.</p> <p>Third party analysis of Oxford Economics, Experian, Cambridge Econometrics are simply dismissed by the report in favour of the Council’s commissioned Edge Analytics. The previous three assessments average as zero growth in housing demand. Edge is out of line,</p>	

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				<p>making very optimistic assumptions to derive development scale that simply does not align with historic development in Kidderminster.</p> <p>At paragraph 5.5 within the OAHN, the breakdown of the OAHN figure of 300 is unsubstantiated and does not connect with the figure of 229 derived earlier. I therefore object to the analysis.</p> <p>At paragraph 5.11 within the OAHN, the report states that there is an intention to attract people to the area at the expense of green belt. I object to the needless expansion of a town that has no business case in support as to the type of skills required. There appear simply to hope for the best. In reality, these peoples will be attracted from the West Midlands to cheap housing and then commute to better paid jobs outside the region. They are most likely to shop outside of the district and so bring little to the town.</p> <p>At paragraph 6.13 within the OAHN, there is disconnect with the previous housing strategy of 200 dwellings/yr where there had been no overall undersupply at this level. This supports a much smaller scale of development than that proposed now.</p> <p>At paragraph 6.14 within the OAHN, this concludes that there is no need to adjust the dwelling</p>	

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				<p>requirement.</p> <p>With so many areas within the report that are lacking detail and objective evidence, the Council has failed to inform properly the Wyre Forest community to allow proper consultation and decisions to be reached.</p> <p>The level of development is entirely dependent upon the OAHN which uses subjective assumptions to derive the recommendations. The document has no clear line of sight from its source data to its final conclusions bringing in figures at table G1 without justification.</p> <p>I therefore object to the scale of development and the consumption of valuable green belt.</p>	
	LPPO3967	Paragraph 6.6	Object	<p>The guidelines set out in the National Planning Policy Framework states that we should consider only future scenarios that could reasonably be expected to occur. The population of the Wyre Forest has only grown slightly since 1991 and remains fairly static. This equates to a 2.7% increase in population growth from 2001 to 2015.</p> <p>The National Statistics Sub National Population Projections (SNPP) 2014 evidences a growth of population for the outlook period at 4.7% with a requirement of only 199 dwellings per annum. This is significantly less than the projection in the WFDC Local</p>	<p>Objection and comments noted.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>Plan Review which states the need of 300 dwellings per annum (this must be based on a 7.7% increase) especially as you suggest that these houses are only for existing residents of the local area.</p> <p>If we used the SNPP recommendations for building 199 dwellings per annum over the stated 15 year period, we only need to build 2,985 dwellings in total - which negates the need to take Greenbelt land around the District and reduces the WFDC consultation figures by 2,415 houses. This would save and protect vital greenbelt land in the area, something that the local council proposed that they were advocates of during the recent general election.</p>	
	LPPO2823	6.6	Object	<p>The Council has manipulated the figures against independent analysis. In respect of affordable housing stock the OAHN says 229 at G1.4, 100 at para 5.9 and the Council says 90 at its Local Plan Review at para 6.4., so this is open to challenge.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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	LPPO3616	Paragraph 6.6	Object	<p>The WFDC Local plan states that 300 houses per annum need to be built to cover the growing population in its area. It also covers the migration of overspill that needs to be considered from the Birmingham & Solihull area. As the population has grown very little between 2001-2015 (1000 approx.) where have the figures come from to justify the amount of houses the WFDC recommends?</p> <p>In a report conducted by Amion for the WFDC. It recommends that 254 houses per year for 20 years were required as a guideline. So why are WFDC recommending 300 houses per year when the Amion report was confident that the migration to the area could be absorbed in their figures?</p> <p>WFDC local plan has also estimated a 6000 population increase by 2034 when as they state in their report population only increased by 1000 approx. between 2001-2015. It states in the local plan this was derived by carrying out an assessment in accordance with the National Planning Policy Framework (NPPF). The guidance on the Housing and economic development needs 2015 states "<u>Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected</u>". How have WFDC come up with the extra 5000 people when population has been</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>

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				<p>relatively stagnant for all those years?</p> <p>The Objectively Assessed Housing Needs (OAHN) states that <u>the census is a relevant source</u>, which would be the most accurate measurement of growth within the Wyre Forest over the last 15 years. So why has the WFDC chose to ignore these figures and use national and regional figures instead. If the census figures were used then a total growth of around 3000 would be more accurate and could be accommodated within brownfield sites. Also in the WFDC local plan it does say “<u>All population growth is to be achieved naturally, with no net inflows</u>”. Surely that contradicts all the figures the local plan states.</p> <p>So to conclude the Housing section I think the WFDC local plan is fundamentally flawed and needs to be thoroughly looked into again and figures recalculated.</p>	
	LPPO3663	6.6	Object	<p>6.5 – 6.7 You have not shown the evidence and justification for the need for 5400 homes and 540 care homes from the local region. It is inevitable that these homes will be populated from in migration throughout the UK and will commute out of the region.</p> <p>OAHN:</p> <ul style="list-style-type: none"> The assessment of housing need at table G1 stage 1 shows a total current needs 	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating</p>

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				<p>requirement of 1726 households at Step 1.4A. There is no direct line of sight as to where this figure has come from within the evidence based document</p> <ul style="list-style-type: none"> • The document is therefore not objective and is misleading to the consultation. Extra time is therefore needed for the consultation to review the objectivity of the document and assess how the figures have been derived. It is further noted that detailed information from just 39% of the households on the housing register and has been grossed up to the 3308 on the housing register this is open to error and assumptions drawn to make this assessment and not objective. The breakdown is derived from just 39% sample and not definitive. • The figures relied upon have been grossed up from a small sample. There is potential for error. All should have been contacted as they are on the electoral register the details will be available. • Clearing the housing need entirely will simply draw into the area from outside those that perceive quicker access to housing in Wyre Forest compare to other areas and so join the housing register creating more demand that is unsustainable. Acting like a magnet for housing need from other areas. 	<p>housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<ul style="list-style-type: none"> • Step 2.1 – there is no guarantee that the figure of 574 for new household formation can be guaranteed each year until 2034. • Step 2.2 – no clear line of sight within the document as to where the percentage of 83.7 has been derived. If this was 60.1%, this would reduce the number of new households requiring affordable housing to just 345 and therefore the supreme new affordable and social housing requirement of zero. • The stakeholders in this report do not back up Wyre Forest need for new Housing. • A4.5 – A4.7 Stakeholders consulted. One stakeholder commented on a recent slowing down in the market, with low levels of mortgage applications. They considered that future trends will be determined by “market forces, Government schemes, impact of RTB and mortgage availability”. • 8.6 We propose that the OAHN should be 300 dwellings per annum. This figure sits at the upper end of the dwelling requirements suggested by the various demographic scenarios that have been developed and the component key variables regarding migration, headship rates and economic activity. • Why use upper end –why use worst case scenario- the research and rest of the report do not substantiate why use the upper end? 	

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				<ul style="list-style-type: none"> 8.8 Housing market signals suggest that the housing market in Wyre Forest is relatively stable. There are currently no indicators suggesting a need for adjusting the housing dwelling requirement on the basis of market signals. The report is not fit for purpose, it is not objective. The plan should not go ahead. 	
	LPPO4031	Paragraph 6.6	Object	<p>I believe the number of properties required in the Wyre Forest from 2019 to 2034 has been vastly over-estimated by both the Objective Assessment of Housing Need (OAHN) by AMION and the Local Plan Review (the Wyre Forest housing requirements has only grown by 1000 in the last 15 years)</p> <p>I would like to challenge:</p> <ul style="list-style-type: none"> the number of houses you are claiming are required per year and in total until 2034 <p><u>Number of Houses Required</u></p> <p>The number of houses required in the review are based on figures from the Objective Assessment of Housing Need (OAHN) by AMION and then adjusted upwards by yourselves in the review</p>	<p>Objection noted. The statistics used for the OAHN are statistics published by the Government from the Office of National Statistics.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>With the AMION report are the following statements:</p> <ul style="list-style-type: none"> • the latest 2015 mid-year population estimate (MYE) for Wyre Forest suggests a population of just over 99,500, a 2.7% increase since 2001 • International migration has, in recent years, contributed little to population change in Wyre Forest • there are some 44,490 dwellings in Wyre Forest District of which 1,404 are vacant • Wyre Forest is a largely self-contained housing market area (HMA) • the net imbalance is 229 dwellings each year. <p>and within the AMION report is an "edge analytics" report:</p> <ul style="list-style-type: none"> • the population of Wyre Forest is expected to increase by 5.9% between 2014 and 2039, equivalent to an additional 5,880 people (edge analytics report) estimate = 4000 from 2017 to 2034 • estimates that the number of households will increase by 4,294 over the 2014–2039 projection period, equivalent to an additional 172 households per year (edge analytics report) = 2400 from 2017 to 2034 • The DCLG household projection, underpinned by the latest ONS population projection, 	

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				<p>provides the ‘starting point’ in the assessment of housing need (PPG paragraph 2a-015). For Wyre Forest, the 2014-based household projection model suggests an increase of 3,422 households, approximately 190 per year over the 2016–2034 plan period.</p> <ul style="list-style-type: none"> • Edge Analytics has used POPGROUP v.4 technology to develop a range of demographic scenarios for Wyre Forest using the latest demographic statistics. In line with the PPG, this suggests that over the 2016–2034 plan period, the number of households in Wyre Forest will increase by 3,422 (8%), <p>The Local Plan Review states in Table 2.0.1:</p> <ul style="list-style-type: none"> • Virtually static population growth • The District has a low level of in-migration <p>The Wyre Forest District Council Housing Land Availability Report October 2016:</p> <ul style="list-style-type: none"> • states in Table 6 that land is already allocated for 1976 properties for the next five years <p>So these statements indicate an annual requirement of between 190 and 229 new properties. These figures include in-migration , out migration, deaths and births.</p>	

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				<p>Despite these calculations AMION in their conclusions in section 8 propose that the OAHN be 300 per annum which is a worse case scenario. This is because they have run various "models" against their own calculations and have chosen to take the highest.</p> <p>Then in the Local Plan Review sometimes uses a figure of 5400 (which is 18 x 300) but in 6.0.5 uses 6000.</p> <p>In addition in the Local Plan Review the figures in tables 6.0.3. and 6.0.5 do not make sense when correlated with the tables in 31.0.1, 32.0.1, 33.0.1 and 35. I strongly recommend these are looked at urgently as I arrive at a figure for Core Sites of 3563 (including Lea Castle) and you are using 1918 (excluding Lea Castle) in 6.0.5 which gives a discrepancy of over a 1000 in your figures where ADDITIONAL need for properties is not required.</p> <p>I strongly believe that the housing need projection is exaggerated and a realistic housing need can be met on Brownfield sites.</p> <p>The population of Wyre Forest has grown by only 1000 in 15 years, the housing need projection is exaggerated and a realistic housing need can be met on Brownfield sites. The Local Plan Review itself states "Virtually static population growth".</p>	

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	LPPO3783	6.6	Object	<p>Having read LTP4, Green Belt Review and now the Local Plan Review I must conclude the statistics for housing requirement quoted within the documents commissioned are not accurately substantiated and, as such, should be challenged by WFDC before any decision on release of any Green Belt made. Wyre Forest has had a ‘virtually static population growth’ since 2001-2015 (2.2% at most using ONS statistics). Looking at the population of Kidderminster alone, from 2001 -2011 it dropped by 0.14%. An increase from 2011 Census to current estimate of population set in 2016 of 2.1% at most. If the figures were accurately reviewed and if the true objective of the LPR is to meet future housing needs of Wyre Forest in line with current projected growth figures — all development could be achieved on brown field sites. It is therefore the duty of WFDC to ensure developers are not allowed to sit on brown field sites and that all development of brown field sites are completed before approving plans for green belt development.</p> <p>I believe the Local Plan Review to be a cynical attempt to provide a quick, unsustainable fix for the failing local economy - a wolf in sheep’s clothing. The LPR identifies a ratio imbalance of elderly to young and the increased impact that is having on services and ultimately finances of WFDC. The LPR identifies that educational standards within Wyre Forest are below that of national average — thus leading to low paid jobs and</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>zero hour contracts, with very little opportunity for home ownership and personal development. Health within Wyre Forest is generally poor and a proactive stance on high levels of obesity is required. The LPR should identify these problems as core issues that need addressing and not covering over with a temporary influx of cash. The LPR promotes actively pursuing in-migration to resolve such issues.</p> <p>Whilst the new homes allowance of £9,000 per unit is an attractive incentive and 1735 units will generate £15,615,000 for WFDC, this is a short-sighted answer to the long-term problems facing Kidderminster and Wyre Forest as a whole. The introduction of new residents alongside the initial flush of cash will place a burden on already over stretched services. Even considering additional council tax, the proposed development of 3 & 4-bedroom family homes will not help balance the books.</p> <p>It is disingenuous to assume much of the aging population are not contributing to the local economy or are tying up family homes. My own family home will support three generations very shortly. My husband and I both work and run a small business, paying taxes at every level, not least business rates. We fall outside the optimum demographics laid bare within the LPR - which WFDC and their 'Pro Growth Agenda' are chasing. Are we to then interpret the LPR as saying in-</p>	

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				<p>migration (affluent) is the answer to supporting low paid, zero hour contracts and benefits, rather than WFDC addressing the root cause.</p> <p>In 2014 CPRE identified brownfield land within England on which to build 1,000 000 homes. The government's own office for national statistics shows only 537,080 homes have been completed. In October 53 authorities identified that 11% more housing could be built on brown field sites.</p> <p>The Green Belt, first introduced in 1935, but to England as a whole in 1955, was successful in putting in place a planning tool to prevent urban (and localized) sprawl. It is an effective method of ensuring towns and cities rejuvenate brown field sites to prevent slums. England is only covered by 13% of Green Belt so to lose 2% is a huge disservice to future generations. The Green Belt provides countryside up close for 30 million people.</p>	
	LPPO4304	6.6	Comment	<p>Population Growth</p> <p>In the Local Plan consultation (2.2 'The Settlement Hierarchy') it is evident that the population since 1991 has remained fairly static, with only a 1.1% increase been seen in the 10 years from 2001-2011 and only a 1.1% increase from 2013-15, therefore it has only</p>	<p>Comments noted.</p> <p>The statistics used for the OAHN are statistics published by the Government from the Office of National Statistics.</p> <p>The OAHN follows the guidance for</p>

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				<p>grown 2.7% in 14 years from 2001-2015.</p> <p>Your report suggests the need of 5400 dwellings equating to 300 per annum and 540 for homes such as care homes, this is substantially higher than what the figures suggest. The SNPP (2014) projects a growth in population of 4.7% which would suggest 199 dwelling per year over the 18 years which is a 3rd less than the planned suggestion. This would equate to 3582* dwelling instead of 5400 and 30 for care taking this to 229 not 300.</p> <p>The growth rate that the plan suggest is 7.7% which is substantially different to that of the projected rate. Where are these people coming from as you identify our population as a key issue and challenge? The figures from the National Statistics, even though only projected are what we should be considering, it would be interesting to know where your data for 7.7% comes from? Bearing this in mind this is an inflated percentage and with only 3000 homes being needed it questions whether the need for Green Belt land is required or whether the development of Brownfield sites should be optimised to meet the demands of this District.</p> <p>I would suggest that the figures be revisited for consultation as they do not tally up.</p>	<p>determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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	LPPO4078	Paragraph 6.6	Object	Further concerns are the accuracy of demographic assumptions made as a basis for the plan, and the employment prospects behind the assumptions for the longer term housing requirements.	<p>Objection noted.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO4649	6.6 Housing Need	Object	<p>It appears that there is consistently noted to be a need for a significant increase in housing in the Kidderminster and surrounding areas and this is the ‘identified need’ for sourcing additional land in order to allow large-scale development to meet this need. Having checked census figures from 2001 through to 2016, it appears that nothing much has changed regarding population; with a net increase of only c.1,058 people in 15 years. Obviously this increase does not require housing for each of these individuals as some will be couples and families moving into the area, or even existing Kidderminster residents increasing the number of people in their household.</p> <p>So, with this information to hand I cannot understand why the council feels that there is a case for decimating the Green Belt to provide this ‘much needed’ housing. It appears that it would be a way for landowners to make some money with no regard for</p>	<p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				<p>the structure of the area and any housing would actually attract more people to the area rather than dealing with the area’s actual need. From the proposed housing that we have been led to believe that would be built, would attracting large numbers of additional people, likely to commute (shop online, etc) and therefore not directly adding to the economy of the area be beneficial to the Kidderminster area, or just put a strain on already stretched services.</p>	
	<p>LPPO4580</p>	<p>Housing Need</p>	<p>Object</p>	<p>I write in connection with the planning application for the Wyre Forest / Spennells.</p> <p>I strongly object to the development of building on Greenbelt land.</p> <p>The growth of population in the Wyre Forest has been quite static since 2001 only 2.1% increase. The figures show that the population growth between 2001 - 2013 is 1.1%</p> <p>Your figures are totally wrong and I feel that they need to be looked at before a decision is made.</p> <p>We have an aging population and the need for 3/4 bedroom houses is not needed. Figures show that housing requirement over a 15 year period is closer to 904 than the proposed figure of 6000. This means that you do not need to build on Greenbelt land. Please tell</p>	<p>The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036. There will be a marked increase in the number and proportion of older residents. The population aged 65+years is expected to increase by 28.1% from 24,200 in 2016 to 31,800 in 2036. (Data based on ONS 2016-based Subnational Population Projections).</p> <p>This suggests that the population is not ‘static’. For further information please see the updated OAHN Study which will be published on the Council’s website during the Pre-Submission consultation.</p>

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				<p>me where you have this 6000 figure from.</p> <p>There are enough Brown field sites in the Wyre Forest that can be built on for the amount of dwellings needed. For example the old magistrate’s court in Kidderminster can be converted into flats for the young or elderly.</p> <p>Population growth does not prove that we need to build on Greenbelt sites.</p> <p>Quote section 8.8:</p> <p>Housing market signal that the housing market in Wyre Forest is relatively stable. There are currently no indicators suggesting a need for adjusting the housing dwelling requirements on the basis of market signals.</p> <p>This is your own conclusion stating that there is no need for housing development.</p> <p>Your report and plans are not fit for purpose and the whole plan should be abandoned. Your figures are incorrect and over estimating by 1000's.</p> <p>Has there been any evidence about flood risk on the fields. I openly ask the question?</p> <p>On average 3 people live in a house - 2 adults 1 child so</p>	

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				3x 3000 = 9000 residents . Enough I would say.	
	LPPO4586	Housing Need	Object	<p>In the decade following 1991 the population remained static with an increase of 1.1% in the following decade and a further increase of 1.1% 2013 – 2015. Overall there has been an increase of 2.2% in 26 years or less than 0.1% per annum. It is now widely accepted that population growth in the UK is now reducing as an effect of the referendum. (2.2)</p> <p>Currently the Options submitted outline a requirement of 5400 units (becoming 6000) or 300 units p.a. of which just 90 units p.a. will be affordable. There is no evidence whatsoever that there is a need for this number of units which appears to be based upon a population growth in the period concerned well in excess of 7% or considerably greater than has been the case in recent years.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO4148	Housing Need	Comment	<p>The OAHN should be reviewed and houses that are needed should be built on Brownfield sites and empty buildings should be used to provide affordable housing where possible.</p> <p>The OAHN Report is flawed. All figures have been rounded upwards. The use of 4.5% vacancy is out of date and should not have been used. The population growth figure taken by the OAHN has no basis in the</p>	<p>Comments noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published</p>

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				<p>reality of Wyre Forest. 2.1% is a far more realistic figure. The figures used to calculate the housing requirement have been deliberately maximised to produce the highest possible number of houses required. There are so many assumptions made and permutations shown.</p> <p>This means that the housing requirement over the 15-year period of the local plan is far closer to 904 than 6000.</p> <p>Rounding Up and varying numbers: If the OAHN report is accepted, then the requirement is calculated at 284 dwellings per year. The report then rounds up this number to 300 dwellings per year. This simple unjustified action requires the building of 240 houses over the 15-year period. In other words, a section of Green Belt land will be used for housing 240 houses purely because of a rounding up. Who does the rounding up benefit? The only viable conclusion is that it allows the developers. Why would Wyre Forest District Council take a decision which simply increases the profits of developers? Is the Council not here to serve the residents? Then we see the 5400 houses required (6.5 in Local Plan) increase to 6000 (Table 6.0.5) – another 11% increase and 333 houses per annum. What is the actual figure?</p> <p>Vacancy rate: The OAHN report says that the number</p>	<p>their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>of vacant properties in Wyre Forest is 3.2% It says that there are currently 44 490 dwellings in Wyre Forest. It then increases the allowance for vacant properties to 4.5 %. Whilst the 4.5% figure is taken from the 2011 census, WFDC is legally obliged to use the most up to date data available, i.e., the current Council Tax data. There is no logical reason to use the 4.5% figure instead of 3.2%. This means that an extra 578 dwellings (39 per year). In other words, because the OAHN consultants have chosen, without statistical justification, to increase the vacancy rate by 1.3%, 578 houses will be built on the Green Belt.</p> <p>The Assumptions: There are so many assumptions within the OAHN and the projected number of houses required differs greatly, the higher number (332) being an increase of 66% on the lower (199). The OAHN states that ‘the emphasis should be more towards the upper end of the ranges suggested’ for migration (the Long-Term scenario but including UPC), headship rates (the partial return headship rate - HH-14 PR) and (in the jobs-led scenario) economic activity (OBR2). This would equate to a maximum of 309 per annum (the PG-Long Term figure). Then there is a token gesture that some recognition should be afforded to the results of the analyses of the employment implications of the demographic scenarios (and vice versa) based on the economic forecasts and a final rounded number of a suggested 300 dwellings per annum. This</p>	

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				represents an uplift of 33% and 25% respectively on the SNPP-2014 demographic-based forecast results in a projected need of between 199 and 239 dwellings per annum (depending on the household formation assumptions adopted).	
	LPPO4400	6.6 Housing Need	Object	<p>It is the considered opinions of those who have analysed the statistics in detail the Wyre Forest Housing Need report is flawed and only in the region of 3000 dwellings are required. In the main these could be met from Brownfield sites. This is fundamental & needs re-examining by independent experts.</p> <p>I would also question whether there has been a rigorous enough assessment of Brownfield sites within the District.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO5152	Housing	Comment	Considering the large number of houses that have been built on brown field sites in recent years we are surprised that the Wyre Forest has been assessed as requiring so many dwellings in the coming years. We understand that independent consultants were used to assess the level of need but what were the sources used to secure this information?	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published</p>

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					their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	LPPO5128	Housing numbers	Object	The build assumes an 8% growth population growth in Kidderminster over the same period that so far has only seen a 2% growth. This exaggerated 8% has no basis in the town or district's actual demographics or patterns since 1991. Population growth in Kidderminster over 2001-2016 was only 2.7 %.	Objection noted. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	LPPO4680	6.6 Housing Need	Object	I would like WFDC to recheck their proposed housing figures. P14 of the WFDC report states that there is ‘Virtually static population growth’ so where exactly has the 6000 new houses been arrived at? Never before has WFDC been asked to accommodate so many new homes, and with Brexit, there will be even less in-migration than before, so levels should reduce not increase. I believe these figures are grossly over exaggerated. Are you being transparent and telling us	Objection noted. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published

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				<p>we are taking Birmingham overspill as nothing in your figures suggest the need for so many houses as stated? As below in my suggestions and your bullet point 3 below, we need to build more town centre apartments for the elderly, and not suburb housing as in Option A. Town centre Brownfield site regeneration must take priority for apartments. These would also require a smaller land footprint, meaning that WFDC could meet their demand with less land required.</p> <p>The OAHN Report which was used by you to arrive at the number of houses needed states that the census is a relevant source, which would be the most accurate measurement of growth within the Wyre Forest over the past 15 years. This is ignored and instead an arbitrary national and regional figure is used to arrive at the final growth rate. Wyre Forest has a population growth below the national average and within the Guidance on the Housing and Economic Development Needs assessments 2015, it states that “assessing development needs should be proportionate and does not require the local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur”.</p>	<p>their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO4634	6.6 Housing Need	Comment	For Kidderminster & Stourport the Local Plan seeks to bring in population from outside areas. Such a population would no doubt work outside the area adding to traffic pollution. New affordable houses	<p>Comments noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in</p>

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				<p>should be earmarked for local people trying to get on the property ladder.</p> <p>Restrictions should apply so the intended “local people” actually become the purchasers as opposed to those not intended for when built. Instead we predict the bulk of development will be 4/5 bedroom houses with tiny gardens i.e. providing larger profits for developers whilst ignoring what local people want. These developments provide little green space for community wellbeing and habitats for nature. Conversely, Bewdley, Chaddesley & other villages are required to provide "housing to meet local needs." Why the difference?</p> <p>We question the need for 300 houses p.a. which is based on a growth rate of 7.7% & not the actual 2.7% (2001-15) which is way below the national average used to arrive at the large figure required. The true figures based on Kidderminster's census figures could easily be accommodated in brown sites like Lea Castle.</p> <p>Furthermore these growth rates figures are based on assumptions prior to the Brexit vote which in the long term will impact reducing the migration of European people to this county that would have had a housing requirement. The predicted growth rates are fundamentally flawed in many ways meaning the migration to this area will be greatly reduced therefore</p>	<p>guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				the growth rates cannot be used to predict the requirements for housing growth required in the WFDC area.	
	LPPO4833	6.6 - Housing Need	Object	The estimates for population growth and hence residences required in the Wyre Forest over the next 18 years has been grossly exaggerated. The Office for National Statistics Sub National Population Projections (SNPP) 2014 Report estimated a population growth of 4.7% and therefore a need for 199 dwellings per annum. In actual fact the population of the Wyre Forest has only grown by a net figure of 1000 or 2.7% over the past 15 years. The core plan provided in the Amion Report would provide 3640 dwellings, which is an average of 202 per annum, which would accommodate an increase of 3% population – a far more realistic projection. Indeed since industry and thus employment within Kidderminster is currently in decline, even these figures appear to be over ambitious.	Objection noted. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	LPPO4678	6.6 Housing Need	Object	I disagree with the Local Plan which states that the use of Green Belt is necessary to facilitate the building of 6000 houses in the next 15 year period as not enough Brownfield sites are available. According to the statistics on page 39 of the Local Plan Review, there is a total of 967 dwellings completed or with planning permission granted on Brownfield sites, with a further 1193 proposed by the plan	It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing

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				<p>on other Brownfield sites. 350 dwellings are also proposed on Greenfield sites not in the Green Belt and 796 dwellings can be placed on previously built Green Belt land including 600 of these at Lea Castle. This makes a total of 3306 dwellings.</p> <p>Even using your confusing calculation of 300 homes required per year, this would mean at least 11 years would pass without any Green Belt needing to be removed. As you only need to show a 5 year land supply to avoid unwanted development challenges, the Green Belt review at this time is unfounded and unneeded.</p>	<p>requirements. This will include some greenfield sites within the Green Belt.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO3226	6.7	Object	<p>For the reasons sighted in paragraph 6.3, Table 6.0.1 is not supported by the OAHN document what has different figures and the OAHN dismisses three independent analyses as being inconvenient to its engineered numbers to support a political council Ambition that simply is not required. At 6.13 it is stated that the previous housing strategy was 200 houses per year yet at 6.14 concludes no need to adjust the dwelling provision. This is completely unacceptable and is absurd.</p>	<p>Objection noted.</p>
Sir Thomas White's Charity	LPPO912	Para 6.7	Support	<p>In relation to housing development, the Preferred Options document seeks to provide for 5,400 dwellings (300 units per annum) over the plan period. This</p>	<p>Support is noted.</p>

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				represents a notable increase from the 200 dwellings per annum requirement in the currently adopted Local Plan. This increase is welcomed in order to ensure the Council are meeting their Objective Assessment of Housing Need. Our client also supports the approach of employing an annual requirement of 300 units, rather than a stepped trajectory, as this will ensure a steady supply is achieved throughout the plan period.	
	LPPO2591	Paragraph 6.7	Object	The Plan makes reference to another document regarding the calculations for the number of dwellings required in the plan period. It would be better if the Plan itself showed these calculations in the interests of transparency.	Objection noted.
Gladman Developments Limited	LPPO1438	para. 6.8	Comment	<p>The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. If a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.</p> <p>In this regard, Wyre Forest District Council must be able to demonstrate that it has engaged and worked with neighbouring and nearby authorities, alongside</p>	Comments noted. WFDC continue to have Duty to Cooperate discussions with its neighbouring local authorities, and will continue to consult on subsequent stages of the Local Plan review process.

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				<p>any existing joint working arrangements, to satisfactorily address cross boundary strategic issues and the requirement to meet any unmet housing needs.</p> <p>It is noted that the Local Plan Review Preferred Options Document includes a section on the ‘Duty to Cooperate’ at paragraph 6.8. Reference is made here to the conclusions of the Council’s OAHN Study, April 2017 on the definition of the housing market area and indicates that Wyre Forest District Council area is co-terminal with the Wyre Forest Housing Market Area and as such the housing requirement is based solely on the needs of the Wyre Forest. This conclusion is somewhat surprising given the location of the district in the context of the West Midlands region and that the CURDS Study indicates that Wyre Forest falls within the Worcester HMA alongside the local planning authorities of Worcester City, Malvern Hills, and Wychavon. Gladman are of the clear view that this will need to be explored further during the process of finalising the Local Plan and that this is a matter that must be carefully considered alongside the relevant authorities within the auspices of the Duty to Cooperate.</p> <p>At the publications stage, it will be essential that the process that the Council has followed to fulfil its duty to cooperate during the plan making process is fully</p>	

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				documented. This should provide background information on the issues that have been tackled and justification for any associated outcomes, including consideration of a robust way forward should agreement not have been achieved across all relevant issues.	
Barratt Homes West Midlands	LPPO764	Para.6.8	Object	We consider that Wyre Forest WILL need to play an active role in helping to meet the growth needs of Birmingham and the Black Country. About 60,000 additional dwellings will need to be delivered in adjoining areas. This is likely to affect commute to work patterns and distribution of development. Until the distribution of this large shortfall is agreed it is premature for the Wyre Forest emerging plan to assume that it has no role to play.	Objection and comments noted. WFDC continue to have Duty to Cooperate discussions with its neighbouring local authorities, and will continue to consult on subsequent stages of the Local Plan review process.
South Staffordshire Council	LPPO1251	6.8	Comment	As a member of the GBSLEP, Wyre Forest District Council (WFDC) participated in the initial PBA Strategic Housing Needs Study work. Stage 2 of the SHNS was published in November 2014 and confirmed that whilst WFDC did not comprise part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), it had close links with it. Based on the earlier housing market areas, work undertaken for the National Housing and Planning Advisory Unit and published by DCLG in 2010, WFDC was a best fit with the Worcester HMA along with the three South Worcestershire Authorities (Worcester, Malvern Hills and Wychavon), but as these authorities have an	Comments noted. WFDC continue to have Duty to Cooperate discussions with its neighbouring local authorities, including South Staffordshire Council.

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				<p>adopted plan, it follows that for the purpose of this round of local plan making, WFDC is a free-standing HMA.</p> <p>The Issues and Options consultation noted support for additional in-migration, particularly of working age people, due to the ageing population in WFDC. The Amion / Edge Analytics 2017 Objective Assessment of Need Report, verifies the ageing population and also identifies internal migration as being the principal source of population growth. Figure 2.3 and table 2.2 in this Report show that the principal source of this is conurbation authorities within the GBBC MA.</p> <p>In considering economic factors, the Amion / Edge Analytics Report suggests an OAN of 300 dwellings per annum, compared to a demographically driven figure derived from the 2014 household projections of 199 dwellings per annum. The situation in the South Worcestershire Authorities mirrors that of WFDC in that they too are seeking economic led growth, which requires more people than demographic projections suggest and is reflected in the adopted plan. It follows therefore, that the same must apply in WFDC.</p> <p>The adopted Birmingham Development Plan acknowledges a shortfall of 37,900 dwellings in the GBBC HMA arising from the city alone and evidence emerging from the Black Country Core Strategy may lead to the overall HMA shortfall increasing further. It is logical to conclude that increased supply in WFDC is</p>	

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				likely to be met by additional migration from the GBBCHMA; this is reflected in 8.12 of the Amion / Edge Analytics Report. The recently published proposed modifications into the Telford and Wrekin Local Plan are relevant in this context in that the Inspector has acknowledged interactions between HMAs. As a consequence, we (together with our partner authorities within the GBBCHMA) would welcome the opportunity to discuss this matter with you further, with a view to signing a Duty to Cooperate Statement / Memorandum of Understanding between the relevant local authorities.	
CORE11	LPPO202	6-8	Comment	The last line at 6-8 refers to the Core Strategy as one of the legal statutory instruments to be followed alongside the NPPF.	Comments noted.
	LPPO479	paragraph 6.8	Support	Pleased that Wyre Forest District only has to plan developments in line with Wyre Forest District needs, however, as commented before I do not believe that we need 300 new properties p.a.	Support is noted.
South Worcestershire Authorities	LPPO1243	Duty to cooperate	Comment	Whilst paragraph 6.8 refers to the Duty to Cooperate, it is not clear what agreement, if any, has been reached with regard to the role of Wyre Forest District in providing homes to meet need arising outside of its own Housing Market Area and any implications that this may have for the Development Strategy. The SWCs welcome the opportunity for further	Comments noted. WFDC continue to have Duty to Cooperate discussions with its neighbouring local authorities, and will continue to consult on subsequent stages of the Local Plan review process.

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				discussions with Wyre Forest District Council as the Local Plan Review progresses in order to comply with on-going requirements associated with the Duty to Cooperate. Consequently the SWCs wish to continue to be consulted on subsequent stages of the Wyre Forest Local Plan review.	
	LPPO3748	6.8	Object	The Wyre Forest District is incorrectly quoted as being within the West Midlands – it is within Worcestershire! Clearly the Executive should revise his geography! I have no confidence of the flawed report nor its conclusions. For the reasons sighted within 6.3, the Plan does not correctly forecast the housing requirements and this will lead to needless consumption of valuable green belt. There is clear evidence that the council has engineered its documents to deliver a policy that is unsupported. There is evidence that Wyre Forest is presently a stable housing market area and stakeholders consulted say that there is no sizeable demand for new housing. The Council is misguided in its judgement to try and grow artificially a town that does not want or need to become a competitor to West Midlands or surrounding areas. If the area is presently stable that there is no need to damage this with negative impact upon infrastructure, health facilities, transport etc that a grossly enlarged town would create. The Wyre Forest towns are presently sweet balanced areas to live without becoming ever larger and changing their	Wyre Forest District forms part of the West Midlands Region, as does Worcestershire.

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				character. I therefore object to the statements made as the information is false.	
	LPPO3750	Paragraph 6.9	Object	<p>I object to the Council’s plans for use of land in general; development has been inefficient in terms of land consumption.</p> <p>The Council is misguided in its quest to continue to grow– this will change the character of the areas and imbalance the supporting infrastructure.</p> <p>Inner town development with better more efficient design for affordable housing/presence in town centres would be more efficient use of land.</p>	Objection and comments noted.
West Midlands HARP Planning Consortium	LPPO1333	Para 6.9 - Land supply	Comment	<p>Criterion a. should be amended to include Housing Association Registered Providers. The revised criterion should read as follows:</p> <p><i>a. Working with house builders / landowners / Housing Association Registered Providers, to monitor and progress the housing supply and to identify any causes of supply problems and where appropriate to act on feedback received.</i></p> <p>It is noted that there is no specific mechanism whereby if the housing supply falls by 10% below expectation in any monitoring period and how the Council would respond to the shortfall. A solution could be that the council could bring forward reserve sites, this would</p>	Comments noted.

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				give more accountability.	
	LPPO3673	6.9	Object	6.9 It appears the council have already been in negotiations with Persimmon homes. This is evident by the actions of Persimmon homes in laying claim to the planning permission for the land before any consultations have been concluded with the public.	Objection noted.
Wyre Forest Community Housing	LPPO1645	Para 6.9	Comment	In respect of the Management of Land Supply we support work by the District Council to ensure that it is in a position to respond quickly to changing circumstances and we note and support the initiatives suggested.	Comment noted.
Gladman Developments Limited	LPPO1341	para. 6.9	Comment	Gladman wish to stress importance of pro-active monitoring of housing needs and supply over plan period. Request that a policy is included in Local Plan to clearly set out the positive planning measures that will be adopted to ensure a five year supply of deliverable housing sites is sustained.	Comments noted. WFDC already provides housing monitoring information and will continue to do so. Disagree that a policy should be included in the Plan on five year housing supply as LAs are already required to maintain a 5YHLS in the NPPF; it would therefore be a repeat of national planning policy.
	LPPO294	6B	Support	Support for Policy 6B.	Support noted.
Wyre Forest Green Party	LPPO1485	Sustainability Appraisal	Comment	In the presentation of the two preferred options (in Appendix E of the Sustainability Appraisal), Option A appears to have more plusses and less minuses than Option B. However: <ul style="list-style-type: none"> The so-called Eastern Relief Road is not 	Comments noted.

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				<p>necessarily a benefit as has been already explained;</p> <ul style="list-style-type: none"> • There is no evidence that a road, for which there is no detail, will “help reduce traffic congestion in the town centre”. • Option A claims to have a significant improvement “on traffic issues and the Air Quality Monitoring Area around the Horsefair in Kidderminster.” Any traffic amelioration measures which take place at the Horsefair can be done in conjunction with a redevelopment of the sites at Churchfields and are completely independent of housing development and roads at Spennells. • There is a claim that Option A will “enable more effective school provision” by concentrating over 1000 homes in one area – however, there is no guarantee any school will be built. • Concentrated development to the East of Kidderminster is said “to provide additional services and facilities such as infrastructure, shop, school, cycleways and footpaths.” This could equally be said for a concentrated development in any area. 	
Gladman Developmen	LPP01573	6.11 Sustain	Comment	In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local	The Sustainability Appraisal is a document that runs in parallel with our emerging Local Plan.

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ts Limited		ability appraisal		<p>Plans must be subject to Sustainability Appraisal (SA).</p> <p>The Council should ensure that the results of the SA process clearly justify the policy choices made within the Local Plan. It should be clear why some policy options have been progressed and others have been rejected. The Local Plan's approach to scoring and the associated decisions made, should be robust, transparent and justified. The sustainability merits of all of the reasonable alternatives should be fully explored and tested in the context of their ability to achieve a sustainable form of development that accord with national policy and fully support the economic, social and environmental objectives of the area. Care must be taken to ensure that each reasonable alternative has been considered to the same level of detail as the option that is eventually chosen within the Local Plan.</p>	<p>Work on the SA is continuing as we progress further with our plan. Reasonable alternatives have been considered in the SA and will continue to be considered as we progress with the work. The SA will be published during the Pre-Submission consultation.</p>
Persimmon Homes Limited	LPPO1594	Paragraph 6.11	Comment	<p>There are further areas of the Sustainability Appraisal which need to be amended to reflect the potential benefits of development identified in the accompanying Illustrative Masterplan (Appendix 1). A summary of the changes, and justifications, has been proved as part of Appendix 2 which indicates a significant improvement of the sites scores in areas around accessibility, sustainable transport, landscape and townscape, biodiversity and the historic environment setting.</p>	<p>Comments noted. The SA will be reviewed and updated for the pre-submission plan.</p>

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Persimmon Homes Limited	LPPO1601	Paragraph 6.11	Comment	<p>The site scores well on its own merit and when compared to other sites in Bewdley, such as Alton Nurseries, Tower Farm Long Bank, land at Dry Mill Lane and Lax Lane they all contain at least one significant negative score in the Sustainability Appraisal whereas Catchem’s End does not. The site is shown to bring strong benefit in terms of housing numbers and with regards to promoting an active lifestyle and health and wellbeing; a range of appropriate housing; the protection of water facilities and against flooding and promoting energy efficiency whilst also maintain and enhancing community identities. As shown in Appendix 2 the scoring that Catchem’s End received in the Sustainability Appraisal was flawed. The amended scoring shows that Catchem’s was significantly more sustainable than other sites within the area and can provide significant benefits to the settlement.</p> <p>Site can provide quality open space, which is not possible on other sites, this would also help maintain and improve biodiversity and geodiversity whilst also conserving the local historic environment; two points that the site was marked poorly on in the Sustainability Appraisal. The open space would also provide further safe pedestrian and cycle routes for the residents living on the site and from the wider settlement.</p>	Comments noted. The SA will be reviewed and updated for the pre-submission plan.
	LPPO4735	6.11	Comment	It is not very clear from this document what allowance has been made in these plans to what is happening	Comments noted. Information about neighbouring Local Authority areas can be

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				<p>elsewhere in areas around the Wyre Forest and what effect the inclusion in the West Midlands LEP as well as the Worcestershire LEP except to include reference to co-operation (Paragraph 6.8 , Page 26)</p> <p>This development strategy says (para 6.11) that it is linked to the 'Wyre Forest Vision' (Para 3.1) but I don't see much evidence of this in the subsequent pages. There is little reference to this vision just many references to government requirements. On a local level I would wish to see the former take preference over the latter.</p>	<p>obtained from their Council websites. Information about the LEPs can also be obtained from the LEP websites.</p>
	LPPO3541	Paragraph 6.11	Object	<p>Heavy weight would be put on the supply of resources such as schools, utility supplies, highways etc. Surely the housing that have been constructed on the sugar beet site far outweighs the percentage of new build required by the government. When the proposal goes ahead, notice I don't say if, the sprawl will continue until Wyre Forest is joined into the built up surrounding areas with no green space left.</p>	<p>Objection noted.</p>
	LPPO3751	Paragraph 6.11	Object	<p>I object to the Council's development strategy which is unsustainable and will alter the character of the towns driven by false OAHN conclusions and damage the economic, environmental and social characteristics of the area.</p>	<p>Objection noted.</p>

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	LPPO118	Sustainability Appraisal Para 5.35	Comment	Your 'Preferred options sustainability appraisal report' talks at point 5.35 of the Highclere site (and other sites)'With mitigation of highway improvements may have the potential for a neutral effect' (of increased traffic). The use of the word 'may' is highly significant. It is impossible to consider what highway improvements could be carried out to Wyre Hill or Park Lane to mitigate the problems and potential pedestrian casualties caused by increase traffic, due to the constricted nature of both roads.	Comments noted.
Worcestershire Wildlife Trust	LPPO1113	Paragraph 6.11 SA	Comment	We are particularly concerned to see that the Sustainability Appraisal (SA) for the Plan concentrates simply on designated sites (Sites of Special Scientific Interest and Local Wildlife Sites) under SA Objective 9 rather than encompassing wider biodiversity as we recommended during the scoping process. At the very least we consider that the council should be taking into account habitats and species of principle importance as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The legal duty imposed on the council in this regard is set out in Section 40 of the Act and we strongly recommend that the evidence base is re-visited to take account of this. We believe that the failure to consider habitats and species outside designated sites represents a fundamental shortcoming in the SA and may undermine the decisions taken so far. This is underlined by the overall SA finding that ' <i>it would be</i>	Comments noted. We will look to updating our evidence base and also our SA to take on board these issues raised.

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				<i>expected that both options would have a significant positive effect on the district's biodiversity', which we consider to be highly unlikely at the moment. Further work to determine the impact of proposed allocations will be required to ensure that the Local Plan is based on sound evidence and can be progressed in line with the law and relevant planning guidance (see for example NPPF paras. 9,17, 109,110, 117, 157 and 165). We would be pleased to discuss this fundamental issue with the council with a view to improving the evidence base for the Local Plan if that would be helpful.</i>	
Worcestershire Wildlife Trust	LPPO1120	Paragraph 6.11 SA	Object	<p>The assumptions in the SA (suggesting positive biodiversity outcomes) seem extremely optimistic. Whilst mitigation for some of the biodiversity issues may well be possible it will require land take that is likely to have implications for the net developable area (and accordingly the number of dwellings allocated) set out in the plan.</p> <p>We do not consider that these biodiversity constraints have been considered properly in the evidence base for the plan and we do not accept the findings of the SA.</p>	Objections and comments noted. We will look to undertake ecological appraisals of some of the sites in the next stage of plan making to inform the pre-submission plan.
Worcestershire Wildlife Trust	LPPO1121	Paragraph 6.11 SA	Object	Need to update the evidence base for the plan prior to	Objection noted. We will update our evidence

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re Wildlife Trust		ph 6.11 SA		<p>finalising the allocations.</p> <p>We reiterate the need to determine any ecological constraints that may exist using up to date survey information. We cannot see that this has been done and so far as we can ascertain constraints other than SSSIs and LWSs have not been considered in the evidence base or SA for these sites. This may have the effect of rendering their allocation unsound. We therefore strongly recommend that the evidence base for sites listed in Table 32.0.1 and 32.0.2 is updated and that the quantum of development proposed is made acceptable in light of any overriding biodiversity constraints before the plan is finalised.</p>	base accordingly.
Worcestershire Wildlife Trust	LPPO1122	Paragraph 6.11 SA	Object	<p>We reiterate the need to determine any ecological constraints that may exist on any of the sites using up to date survey information. We cannot see that this has been done and so far as we can ascertain constraints other than SSSIs and LWSs have not been fully considered in the evidence base or SA for the plan. This may have the effect of rendering the plan unsound. We therefore strongly recommend that the evidence base for sites listed in Table 33.0.1 and 33.0.2 is updated and that the quantum of development proposed is made acceptable in light of any overriding biodiversity constraints before the plan is finalised.</p>	Objection and comments noted.
Worcestershire Wildlife	LPPO1125	Paragraph 6.11	Object	<p>Proposed allocation BR/RO/4/6 – Although we note the comments set out in paragraph 35.2 of the</p>	Objection and comments noted.

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Trust		SA		<p>reasoned justification we wish to object to the allocation of this site. We do not think it likely that the proposed development would be capable of maintaining the orchard (and any unimproved grassland present) to any meaningful degree given the level of housing proposed and we do not agree with the SA conclusion that the site would have a neutral effect on biodiversity (which we assume has been reached because the evaluation only considered designated sites). Traditional orchards are included under Section 41 of the NERC Act 2006 (and often contain S41 species including the noble chafer, which is known from nearby sites) and we cannot find any justification for the losses that would be likely set out in the evidence base for the Plan. As a result we object to this allocation on current evidence and would strongly recommend that further work be done to determine the impacts prior to any final allocation being accepted. It is important to note that any significant reduction in developable area arising from biodiversity constraints may render the site unviable.</p> <p>Proposed allocation BR/RO/7 – This site is also partly traditional orchard and whilst some level of development may be possible the issues set out above still pertain and again we wish to object to its allocation until further evidence is available to demonstrate that development here is sustainable.</p>	

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				<p>The majority of other sites proposed under this policy also have likely biodiversity implications and so we reiterate the need to determine any ecological constraints that may exist on any of the sites listed under this policy using up to date survey information. We cannot see that this has been done and so far as we can ascertain constraints other than SSSIs and LWSs have not been fully considered in the evidence base or SA for the plan. This may have the effect of rendering the plan unsound. We therefore strongly recommend that the evidence base for sites listed in the two allocations tables is updated and that the quantum of development proposed is made acceptable in light of any overriding biodiversity constraints before the plan is finalised.</p>	
Natural England	LPPO1128	Sustainability Appraisal	Comment	<p>Natural England is pleased to have been consulted at this stage in the SA process and welcome the general approach taken by the Sustainability Appraisal. We acknowledge that the SA has considered reasonable alternatives by considering a range of potential sites for development and that all of the sites have been assessed against the SA objectives.</p> <p>We note at 2.16 that the next stage of the local plan will consider ‘proposed site allocations’ i.e. pre-submission (Scheduled for Spring 2018) and further that;</p> <p>4.2 “.....Alternatives considered at the early stages of plan-making need not be elaborated in too much detail</p>	Comments noted. Agree to further engagement with Natural England.

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				<p>so that the “big issues” are kept clear; only the main differences between alternatives need to be documented i.e. the assessment should be proportionate to the level and scope of decision-making for the plan preparation”.</p> <p>4.4 – “As a plan evolves, there may be further consideration of options that have developed by taking the preferred elements from earlier options. Thus the options for plan-making change and develop as responses from consultation are considered and further studies are undertaken.”</p> <p>4.5 – “There is a hierarchy of options assessment with sites that are not viable or deliverable or might have adverse effects on protected environmental assets rejected at an early stage.”</p> <p>Nonetheless our concerns regarding sites consulted on in 2016 and affecting nationally designated sites around the town remain unaddressed. Our consultation responses dated 9.9.16 and 2.12.16 refer. Natural England repeats its requests for a meeting (previously expressed by email in December 2016 and April 2017) with the LPA to discuss the approach to be taken with regard to these sites.</p> <p>We draw the Council’s attention to the fundamental nature of these concerns and the need to ensure as far as possible that the plan can be judged ‘sound’ at the next stage of local plan making.</p>	
Natural	LPPO1129	Sustain	Comment	The comments set out below relate to the matrices	Comments noted. The SA will be updated

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England		ability Appraisal - Sites		<p>within Appendix G and follow up on our previous response on the SA:</p> <p>FPH/1, Settling ponds, Wilden Lane – the SA matrices for this allocation highlights that proposals could result in impacts on landscape and biodiversity but it is not explained in the accompanying text. We would have concerns that development in this location could potentially impact on the Wilden Marsh & Meadows SSSI.</p> <p>BW/4, Hurcott ADR – we note that the matrices have identified that this site is adjacent to the SSSI and a residual negative impact on landscape and biodiversity may result unless mitigation is in place. We acknowledge that the local plan policy explains that extensive areas will be left undeveloped to protect the adjacent Hurcott Meadows SSSI.</p> <p>WFR/WC/15, Lea Castle - we acknowledge that the SA identifies that this site includes large tracts of woodland and acid grassland that needs to be protected and that fragmentation of ecological corridor should be avoided.</p> <p>BR/RO/7, New Road Far Forest and BR/BE/6, Land off Highclere – priority habitats should be considered within these allocations.</p>	accordingly.

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				<p>AS/5, Victoria Carpets, Sports Ground – Whilst flooding issues are mentioned in the SA for this site the possible impact on the Wilden Marsh & Meadows SSSI via the Hoo Brook has not been included.</p> <p>OC/13 East of Kidderminster – Whilst we support enhancements to the watercourse and pools for this area we would expect the SA to mention the potential impact on Wilden Marsh & Meadows SSSI.</p> <p>MI/3, Parsons Chain – The potential impact on the Hartlebury Common and Hillditch Coppice SSSI should be mentioned.</p> <p>FPH/10, British Sugar Phase 2 – the potential impact on Wilden Marsh & Meadows does not appear to have been fully considered.</p> <p>BW1, Churchfields & BW2 Lime Kiln Bridge – the impact on deciduous woodland, the River Stour and Wilden Marsh & Meadows should be considered.</p>	
Worcestershire Wildlife Trust	LPPO1114	Paragraph 6.11 SA	Object	Of particular note is the need to determine any ecological constraints using up to date survey information. We cannot see that this has been done and so far as we can ascertain constraints other than SSSIs and LWSs have not been considered in the evidence base or SA for the plan. This may have the effect of rendering the plan unsound. We therefore	Objections and comments noted.

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				<p>strongly recommend that the evidence base for sites listed in Table 30.0.1 is updated and that the quantum of development proposed is made acceptable in light of any overriding biodiversity constraints before the plan is finalised.</p> <p>Notwithstanding the broad comments above we wish to object specifically to the allocation of site FPH1 (Settling Ponds, Wilden Lane) because we consider that development here will lead to unacceptable adverse impacts on the adjacent SSSI and our Wilden Marsh Nature Reserve. This is a particularly significant issue because the site has been included as a Core Site in the Local Plan with Option A proposing employment and Option B proposing housing. Both options are likely to have impacts that we do not believe can be effectively mitigated because of the limited space available and the very close proximity of development to the SSSI and reserve. In light of this we are extremely surprised to note that the Sustainability Appraisal scored Option A as a minor negative and Option B as neutral in terms of the impact on the designated site and we seriously question the underlying assumptions made to reach this conclusion, especially given the commentary in the consultation document regarding the need for further hydrological study.</p>	
	LPPO2031	Policy	Object	There are no facilities for extra housing. There are not	Objection noted.

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		31		enough schools or doctors surgeries. We will lose more of our green area which will do the ozone no good what so ever.	
	LPP01596	Sustainability Appraisal	Comment	<p>The Local Plan Preferred Options attempts to qualify the loss of Green Belt land via use of its Sustainability Appraisal Methods. The following 4 objectives have clearly been ignored, as have the decision-aiding criteria with the Preferred Options to the Local Plan.</p> <p>(tables included in full response)</p> <p>The local authority has also ignored numerous environmental aspects. The noise, visual intrusion and pollution the by-pass would cause to people both living and working in the areas affected is huge.</p> <p>There are various breeds of bat to Hodge Hill Farm Barns (common pipistrelle, noctule and brown long-eared) when these were converted from farm buildings to dwellings (see planning permission) the ecological survey by Worcestershire Wildlife Consultancy demanded the provision of both bat roosts and bat boxes. The survey also states that there are further breeds of bat within a 2km radius of Hodge Hill Farm and that Hurcott Podmore pools and Hurcott woods and the primary source of food for bats. WFDC have a legal requirement under the Wildlife and Countryside Act 1981 and Conservation of Habitats and Species</p>	<p>Comments noted. The SA will be reviewed and updated for the pre-submission plan.</p> <p>A Green Belt Study was undertaken to inform the Preferred Options document and has since been updated to consider new sites. This GB study considers the five purposes of Green Belt, as set out in the NPPF.</p>

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				<p>Regulations 2010 to protect the bats in and around Hodgehill and Hurcott. The effects of the proposals to develop on OC/4, OC/5, WFR/CB/7 and the building of a bypass would undoubtedly be detrimental to the bats at Hodge Hill. The Bat Conservation Trust state: <i>If a bat survey demonstrates that bats and/or a known roost are likely to be affected by the proposed development and planning permission is to be granted: condition should be placed on the decision notice requiring the developer to apply for and obtain, a European Protected Species Licence before work commences.</i></p> <p>Hurcott and Podmore pools and Hurcott Woods is an area of Significant Scientific Interest (SSI). We have contacted the Wildlife Trust to make them aware of the proposals to not only the pools, but surrounding wet woodlands within Hurcott. They advise that noise, visual intrusion and pollution of developments in and around Hurcott village would have a negative environmental impact.</p> <p>We would ask Wyre Forest District Council to literally go back to the drawing board and re-consider their own Sustainability Appraisal Objectives and their Decision-Aiding Criteria, and then correctly apply these to any proposals to modify the Local Plan.</p> <p>It would appear to be obvious that the Preferred</p>	

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				Option of squeezing virtually everything into one concentrated area is not compatible with sustainability.	
Spennells Against Further Expansion	LPPO1745	Sustainability Appraisal	Object	<p>In the presentation of the two preferred options (in Appendix E of the Sustainability Appraisal), Option A appears to have more plusses and less minuses than Option B. This is false for the following reasons:</p> <ul style="list-style-type: none"> • The so-called Eastern Relief Road is not necessarily a benefit and the argument for it is demolished in another section of our letter. • There is no evidence that a road, for which there is no detail, will “help reduce traffic congestion in the town centre”. • Option A is claimed to have a significant improvement “on traffic issues and the Air Quality Monitoring Area around the Horsefair in Kidderminster.” Any traffic amelioration measures which take place at the Horsefair can be done in conjunction with a redevelopment of the sites at Churchfields and are completely independent of housing development and roads at Spennells. • There is a claim that Option A will “enable more effective school provision” by concentrating over 1000 homes in one area – however, there is no guarantee any school will be built. 	Objection noted.

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				<ul style="list-style-type: none"> Concentrated development to the East of Kidderminster is said “to provide additional services and facilities such as infrastructure, shop, school, cycle ways and footpaths.” This could equally be said for a concentrated development in any area. 	
	LPPO1751	Paragraph 6.12	Object	<p>Have there been appropriate and detailed studies carried out by suitably qualified and experienced experts to demonstrate this beyond doubt in the Wyre Forest / Kidderminster area?</p> <p>The documentation available does not show this to a degree that would enable the statements made in the Plan that there is insufficient Brownfield Land available in the area to prevent the amount of excessive development proposed on Green field areas (such as the Spennells extension).</p>	Objection noted. A viability assessment study has been undertaken which helps to inform the emerging Local Plan in terms of evidence base.
CORE11	LPPO203	6-12	Support	Support for paragraph 6.12.	Support noted.
	LPPO3752	Paragraph 6.12	Object	I object to the Council’s misguided belief. Using its own contracted analysis, that there is a higher housing requirement. The evidence for which is in the OAHN document.	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p>

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					<p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<p>LPPO3674</p>	<p>Paragraph 6.12</p>	<p>Object</p>	<p>6.12 I would question whether all of the Brownfield sites have been developed. Where is the evidence for this? There appears to be many vacant homes in current developments. Why are these still empty?</p> <p>I would question your reference to Greenfield site – It appears to be a convenient way for Councils and developers to destroy Green Belt land and circumvent Green Belt protections.</p> <p>Please supply written evidence of what constitutes Greenfield sites and why the wildlife, trees and landscape in that area is less significant and does not warrant the same protections than in Green Belt .</p> <p>I would also question the housing requirement as outlined above.</p>	<p>Objection noted. Greenfield sites are defined as not previously developed. The Housing & Economic Land Availability Study (HELAA) provides the evidence to the sites that have been assessed through the Local Plan Review process.</p>
	<p>LPPO3043</p>	<p>6.12</p>	<p>Comment</p>	<p>No Green Belt land should be released until all of the considerable Brownfield land in the Wyre Forest area has been used up. Makes reference to Council previously acknowledging that around 3000 dwellings</p>	<p>Comments noted.</p>

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				could be constructed upon existing Brownfield sites in Wyre Forest.	
	LPPO4403	6.12 Brownfield land	Comment	WFDC should ensure all Brownfield sites are developed first. Otherwise they will never be developed. House Builders only want to build on Green Belt sites as they are more profitable. I notice that Persimmon Homes are appealing to the Government for the release of more Green Belt land. The extra cost of building on a Brownfield site reduces their profit margin.	Comments noted.
	LPPO4650	6.12	Comment	Your plan refers to insufficient sustainable located readily available Brownfield or non-Green Belt land to accommodate the necessary housing and employment growth required in the plan period. We realise that the council offices have now left Kidderminster and been built in the new development towards Stourport but surely all of the WFDC can see that Kidderminster is fast become a ghost town and, rather than moving housing and commercial areas away from the town centre and forever eroding the value of Kidderminster as a town, regeneration within the centre to include housing and refreshed commercial sites should be a priority. There are large pockets of empty, run-down and vandalised industrial sites, as well as areas of land that have been cleared (such as the old leisure centre and ex-retail sites in the town – even the shelved development of the old post office could have provided a large source of town-living apartments) which could so easily have served to provide new units	Comments noted.

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				<p>for commercial premises or town-centre living – the latter actually bringing people into the town and therefore increasing the need for commercial services to provide to residents.</p> <p>From the land reviewed, it appears that there is the potential for 490 + 29 + 779 dwellings under individually reviewed Brownfield sites in urban and rural locations (although Brown Westhead Park in Wolverley and the site of the old quarry on the B4189 seem to have been omitted from these considerations) with more site likely to come forward for consideration. The Campaign to Protect Rural England has provided research to show that housing developments on Brownfield sites are consistently completed more quickly than construction on Greenfield land and, as such, we would ask that you reconsider your useage of the Green Belt for construction. Give Kidderminster and it’s residents a chance to rejuvenate the town centre, use and upgrade its existing infrastructure (rather than destroying more countryside to put a relief road that is not necessary) remove the eye-sores and problem sites that give current residents a headache and allow everyone to enjoy its surrounding green spaces that were given Green Belt status to protect such areas in the first place.</p> <p>We do not need to become another urban sprawl to</p>	

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				meet the needs of the area. Use Brownfield sites in the Green Belt by all means (such as the Lea Castle Site) but stick to existing footprints rather than destroying our precious assets that, once lost, will never be regained.	
	LPPO5073	6.12	Comment	Not enough information about the plans for land that apparently is readily available for development – Lea Castle, ideas for developing the Glades site seem to be at odds with priorities. Proposals for the development of Green Street should be taken into consideration that is as far as Kidderminster is concerned, there must be similar areas or plots of land in the other two towns.	Comments noted.
	LPPO4810	Brownfield Land	Comment	I have little confidence that Brownfield sites are fully identified by WFDC. There should be a public document showing where the Brownfield sites are so omissions could be identified by the public. There should also be a commitment from WFDC that all Brownfield sites are used for housing before Greenfield sites. The use of Greenfield sites should then be phased and reviewed taking population growth into account, as the projections could well be excessive.	Comments noted. A Brownfield Land Register was published on the Council’s website in December 2017. The register will be updated annually.
	LPPO4812	6.12 Brownfield use	Object	Statements have been made that there are not enough Brownfield sites to meet the need, yet there is no comprehensive list of such sites? Statements have been made that Brownfield sites will be built on first, I	Objection noted. A Brownfield Land Register was published on the Council’s website in December 2017. The register will be updated

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				believe this would be firstly illegal and secondly unenforceable. Why have these statements been made?	annually. The Council has considered Brownfield sites as part of the Local Plan process. As much of the District is Green Belt, the Council has looked to accommodate its development need on suitable and deliverable Brownfield sites first before considering Greenfield / Green Belt sites.
	LPPO4824	6.12 - brownfield use	Object	Development of all the Brownfield sites should take place before using any other land. There are more which should and could be considered. There is a large disused property behind Matalan (Park Lane), there is an old building, (inhabited by pigeons) opposite Aldi on Green Street and there are many empty town centre shops. The old Woolworths for example could be turned into an indoor market with small shop units on the ground floor and create flats above.	Objection and comments noted.
	LPPO4843	6.12 - brownfield use	Comment	Use Brownfield sites to meet housing need before greenbelt.	Comments noted.
	LPPO4631	6.12 Brownfield Land Use	Support	I believe that Brownfield sites should be developed where possible over Green Belt areas. The old Chichester Caravans site at the junction of the A451 and the Gilgal does not seem to figure in the plans; I pass this every day of the week but perhaps there are others that I am unaware of.	Support and comments noted.

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	LPPO2108	Locating new development	Object	I have read and re-read the plan and tried to understand why anyone would build on green fields when we have so many empty buildings and sites that have previously been built on. I really hope that an alternative solution can be found to using Green Belt land because once it is gone, there is no going back.	Objection noted.
	LPPO2939	6.12 - brownfield use	Comment	Development over the next 15 year period should be restricted to Brownfield sites, as far as reasonably practicable. Brownfield sites should be used first before any development starts on Greenfield sites.	Comments noted.
	LPPO2100	Locating new development	Comment	There is a need for more housing but they need to be developed on the existing Brownfield sites and empty properties lying derelict on the town centre's Worcester Street. These properties have been empty for far too long and development on these sites are long overdue. Priority must be considered on redeveloping the town centre and existing Brownfield sites without our precious Green Belt being put under threat.	Comments noted.
	LPPO4490	6.13 Green Belt Use	Object	<ul style="list-style-type: none"> Proposals to build on Green Belt land when Brownfield sites (with conversion/demolition of existing buildings/empty accommodation for housing/apartments/OAP complexes in Kidderminster Town a priority). Green Belt land for housing should be the last option. I have no confidence in the statisticians' figures 	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release

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				<p>that we will need the stated number of houses by 2034 so NO building on Green Belt land unless there is a desperate need for housing in Kidderminster by 2034 and all other options have been exhausted.</p> <ul style="list-style-type: none"> • Green Belt land should be left for the quality of our life and future generations, inc consideration for wildlife. • Consideration should be given to using Green Belt land for all to use for the health of our Nation <p>What are the exceptional circumstances in Kidderminster/surrounding area for Wyre Forest District Council to build on the Green Belt?</p> <p>Why are we being asked to comment on such an important issue as building on Green Belt land when planners (Rowland Hill Centre Friday 21.7.17) cannot answer questions on infrastructure as no decision has been made on the Eastern bypass?</p> <p>Is this plan being rushed through and our comments disregarded as decisions have already been made?</p> <p>Building on Green Belt land is a National issue as well as a local one. Too many bad decisions have been made in the past and our MP and Councillors must listen to the local people they represent, the first</p>	<p>some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				consideration must be the quality of life now and for future generations, not lining the pockets of developers.	
	LPPO4871	6.13	Object	<p>Development should concentrate on the undeveloped and derelict Brownfield areas of Kidderminster first to rejuvenate people to want to live there. If premises owners do not put forward empty buildings or vacant properties for redevelopment, this should be done as a compulsory purchase by the Council.</p> <p>The housing figures quoted are disproportionate and unjustified based on comments such as ‘no population growth’. There is ample housing land currently available to take us into the next 10 years, and so at this point, no further land should be removed from the Green Belt.</p>	Objection and comments noted.
	LPPO5084	6.13	Comment	<p>In 2014 CPRE identified Brownfield land within England on which to build 1,000 000 homes. The government’s own office for national statistics shows only 537,080 homes have been completed. In October 53 authorities identified that 11% more housing could be built on brown field sites.</p> <p>The Green Belt, first introduced in 1935, but to England as a whole in 1955, was successful in putting in place a planning tool to prevent urban (and localized) sprawl. It is an effective method of ensuring towns and cities rejuvenate brown field sites to prevent slums. England</p>	Comments noted.

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				is only covered by 13% of Green Belt so to lose 2% is a huge disservice to future generations. The Green Belt provides countryside up close for 30 million people.	
	LPPO4658	6.13 Green Belt use	Object	<p>Why did I respond to the plan? I would like to see the region prosper. I have lived on the Spennells for 30 years and use the footpaths on four or five occasions each week. I have been aware for many years of the possibility of removing the fields from Green Belt protection. However, on reading the plan, I strongly feel that the case has not been made to build on Green Belt.</p> <p>Final Comment - I understand that the Council wrestles with conflicting needs on a tight budget, but the level of justification required before building, especially on Green Belt needs to be addressed urgently and much more rigorously.</p>	Objection noted.
	LPPO4682	6.13 - Green Belt Use	Object	I would also like to include that no Green Belt should be removed at this time as per below (3,640 / 300 per annum) you have a healthy 12 year land supply available already (without any windfall sites arising) in existing Brownfield sites and you are only required to have a 5 year supply available which can easily be evidenced and which would stop any hostile building taking place. Therefore you need to leave the Green Belt restrictions in place until the end of this period as a minimum.	Objection noted.

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	LPPO4895	6.13	Comment	<ul style="list-style-type: none"> • I am struggling to see how any of the supporting reports have informed the choice of options in the Local Plan for the urban extension on the eastern side of Kidderminster. I do not believe there has been any clear reasoning and evidence to support the proposals in this Draft Plan. • The Adopted Core Strategy of 2010 makes no mention of any of the proposed permits for development which appear in the current draft plan. Indeed, section 5.13 of that document states that ‘only proposals which can demonstrate very special circumstances will be permitted’ within the Green Belt. Having trawled through the documents that have been published since I cannot find any evidence of a significant change in the housing needs and demographics of the district, which would warrant overturning that policy. • Green Belt land is there for a very good reason, and creeping urbanisation from the Birmingham conurbation is not permitted under current planning regulations except in ‘exceptional circumstances’. I cannot see that a case has been made here for exceptional circumstances. 	<p>The Sustainability Appraisal report, the Site Selection Topic Paper, and the HELAA assessment provide evidence on the site selection process. There are also other evidence base studies that have helped to inform the plan such as the Employment Land Review, Strategic Flood Risk Assessment and ecological appraisals. The evidence base studies used for the plan can be found on the Council's website.</p>

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				<ul style="list-style-type: none"> The National Planning Policy Framework 2012 and the 2015 Conservative manifesto stated clearly that Ministers attach great importance to the Green Belt and will maintain existing levels of protection. In March this year the Prime Minister declared that protecting the Green Belt is ‘paramount’, and Communities Secretary Sajid Javid said ‘In 2015 we promised the British people that the Green Belt was safe in our hands and that is still the case’. What are the justifications for Wyre Forest to overturn these clear statements of policy from the Government? Landowners have put forward in the call for sites most of the Green Belt land to the east of Kidderminster which is now under threat, as they can obviously see a huge windfall coming their way, and developers can see a greater return on developing these sites than the Brownfield sites still available in the area. It would seem to be the easy option to allow these proposals to go ahead, rather than pursuing other options. 	
	LPPO4588	6.13	Comment	Quotes local Councillors stating that no Greenbelt should be lost if at all possible. These are most sensible opinions which if carried forward would ensure that any inadequacies in the PG figures or failures to meet	Comments noted.

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				the employment targets would not see Greenbelt used unnecessarily and would minimise the need for any incursion into the greenbelt and thus prevent urban sprawl.	
	LPPO4142	6.13 Use of Green Belt	Object	<p>The review of the Wyre Forest Local Plan is proposing the redefinition of its Green Belt boundaries to accommodate its requirements for housing provision up until 2034. It is claiming that it is unable to meet its new housing target of 6000 houses between 2016 and 2034 without using current Green Belt land.</p> <p>Green Belt is our legacy, it is a precious inheritance that we should not abuse, indeed it is a vital part of our environment and something that we should nurture and pass on intact to further generation. It is every bit as important as providing new houses in this area for people that are not even here yet. Once Green Belt is lost its lost for ever, it is irreplaceable.</p> <p>The use of Green Belt for housing provision is against Government policy (<i>The 2017 Housing white paper</i>) states:</p> <ol style="list-style-type: none"> 1. Ensuring that plans start from an honest assessment of the need for new homes, and that local authorities work with their neighbours, so that difficult decisions are not ducked 	Objection and comments noted.

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				<p>2. Making more land available for homes in the right places, by maximising the contribution from brown and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements;</p> <p>iii. Helping households who are priced out of the market to afford a decent home that is right for them through our investment in the Affordable Homes Programme</p> <p>The business secretary Sajid Javid also promised ‘There would be no threat to the Green Belt’</p> <p>WFDC is totally going against the Housing White Paper and the Business Secretary in proposing the use of Green Belt to build houses that are not required. I am against the use of any Green Belt land for building on. Option A takes the whole of the 2.4% stated away from the community of Spennells and Summerfield. Is this fair?</p> <p>Brown sites must be prioritised and used first, as with empty and derelict buildings.</p>	
	LPP03539	Paragraph 6.13	Object	Once the green belt is gone it can never be put back which I am sure you are well aware of. Taking the	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local

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				green belt away will not only have an effect on the wildlife in the area, it will also have a profound effect on casual and weekend visitors, who seek to visit the area for some respite from the surrounding built up areas of the Black Country and Birmingham. This would diminish the 'businesses' of the leisure and catering industry especially in Stourport and Bewdley.	Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.
	LPPO3753	Paragraph 6.13	Object	I object to the Council's strategy for development as it does not have the expertise to develop Brownfield land efficiently.	Objection and comments noted.
	LPPO3153	Green Belt release	Object	I do not agree with the use of any Green Belt land for house building. The British countryside must be protected for our people and also for future generations. It seems that the proposed new housing is needed for an increasing population that cannot be controlled. Brexit appears to be the only way to achieve this.	Objection and comments noted.
	LPPO3208	6.13	Object	I am writing to strongly object to any building over our lovely countryside, for the following reason... The countryside is a beautiful natural haven for wildlife, flowers, hedgerows it is there to be enjoyed by all.	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not

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				<p>I do not accept that we need as many new houses as stated, this area has not had such a huge population explosion. So the new homes must be for out of town commuters.</p> <p>Our roads are already congested, they would become even more so with the amount of proposed new houses.</p> <p>It's very difficult for the existing doctors to cope with all their patients, waiting times for an appointment keep getting longer.</p> <p>The hospitals cannot cope at all with demand, patients in corridors, worst in the country for all manner of reasons.</p> <p>Our schools are full, very often parents cannot get their children into the local school of their choice.</p> <p>There are very few jobs in this area, so any new people will be commuting out of town for work.</p> <p>We need more affordable homes, so the young can make a start on the property ladder, smaller homes near the town centre, so the elderly may be encouraged to downsize to free up their larger family sized homes.</p>	<p>have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				You cannot seriously think that you can build all over our countryside without any consideration for the local people who live here and without any plans to build better roads, more Hospitals, doctors and schools.	
	LPPO2685	6.13 Use of Green Belt	Object	<p>I understand that the Council are considering giving planning permission to build houses on Green Belt land for which many people are opposed to? Given that it is Green Belt I am somewhat surprised at this decision.</p> <p>We do not need more houses, because there is already a glut of them around the country? This will do nothing to 'build relationships between the general public and Governments/Councils.</p>	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.
	LPPO3754	Paragraph 6.14	Object	I object to the Council's development strategy as Green belt being 'open countryside', the consumption of it makes farms less viable.	Objection and comments noted.
	LPPO3755	Paragraph 6.15	Object	The statement is contradictory with its development strategy so I object to that strategy.	Objection noted.
CORE11	LPPO204	6-15	Support	Support for paragraph 6.15.	Support is noted.
Historic England	LPPO1265	6.15 Green Belt	Comment	We note the varied references to the Green Belt and the potential removal of land from the Green Belt for development. We further note the reference to the five purposes of the Green Belt on page 30 which we	<p>Comments on 6.15 Green Belt noted.</p> <p>A strategic review of the Green Belt has been undertaken prior this consultation, together</p>

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				welcome. Has the Council finished the Green Belt review? Was there any impact for the historic environment and if so, how is this being addressed?	with site analysis. Further site-specific analysis is underway which will inform the extent of the Green Belt proposed for the deposit draft. Impacts for the historic environment identified in the review and site analysis will be assessed within the Heritage Evidence Base.
	LPPO452	6.15 OC/4	Object	The Green Belt to the east of Kidderminster plays a vital part in separating the town from the West Midlands Conurbation. Development of land behind Baldwin Road would be a serious visual incursion into the Green Belt and would impact on wildlife habitats on the buffer zones for the Hurcott and Podmore SSSI's.	Objection is noted.
CORE11	LPPO205	6-16	Comment	In discussing green belt issues, it should be noted that where green belt secures any merging of towns or districts, it can however be acquired for recreational use, especially where a shortage of open space prevails.	Comment noted.
	LPPO470	paragraph 6.16	Support	Support for para 6.16	Support noted.
	LPPO3756	Paragraph 6.16	Object	There is no evidence of exceptional circumstances; the housing market is flat with no further demand. Independent analysis is dismissed by the OAHN document. The Council's documents show no	Objection noted.

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				consistent numbers of affordable housing need. I object to the process/development strategy.	
	LPPO3757	Paragraph 6.17	Object	I object to the Council's policy of development as it has missed opportunities to build upwards.	Objection noted.
	LPPO3758	Paragraph 6.18	Object	The Council is misguided in thinking that smaller towns need fewer facilities/infrastructure so these should not be protected from development in favour of overdevelopment of larger towns which increases transport needs. I object to the Council's strategy.	Objection noted.
	LPPO3759	Paragraph 6.20	Object	I object to the Council's strategy for regeneration via more house building - it doesn't work.	Objection noted.
	LPPO3760	Paragraph 6.21	Object	I object to the Council's strategy for development, tourism cannot be enhanced by building more houses the need for which is based on the OAHN which uses subjective assumptions.	Objection noted.
	LPPO3675	6.21	Object	6.21 – There is no evidence for this. Where are the maps and information on which to make a judgment for the Eastern By pass? You have not advised how regeneration will occur. The transport, road and rail links are insufficient. Developing roads further will have the opposite effect on the region, serving to bypass Kidderminster completely on the way to Birmingham or Worcester.	Objection noted.
	LPPO3761	Paragraph 6.22	Object	I object to the Council's strategy, it should encourage better land use via more efficient design.	Objection noted.

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	LPPO4506	6.23	Comment	Stourport has recently developed excellent venues for food/live music and has a thriving evening/weekend economy so residents do not need to travel to Kidderminster which should no longer be regarded as the evening entertainment/social hub of the area.	Comments noted.
	LPPO3764	Paragraph 6.24	Object	I object to the Council's strategy; there is not an infinite supply of green belt on which to build falsely derived housing analysis.	Objection noted.
Moor Park Trustees	LPPO1099	6.24 - Urban extension	Support	The proposal, for an urban extension, maximizes two key basic principles a key one of which is a scale of new development which will allow effective provision of infrastructure and will thus capture sufficient contributions for supporting infrastructure.	Support noted.
	LPPO3765	Paragraph 6.25	Object	I object to the Council's strategy, the OAHN document contains conflicting evidence and is dismissive of independent analysis reporting a false scale of development. There is sufficient brown field land for modest development to enhance the area and attract investment.	Objection noted.
	LPPO3676	6.25	Object	6.25 I do not believe you have justified the need to release Green Belt under the NPPF. Please see my comments under 1.18. You have not provided sufficient evidence under the areas highlighted.	Objection noted.
	LPPO506	6.25	Object	Why do we need so many extra houses - I think the	Objection noted.

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				premise is wrong. We don't need to use the Green belt in the eastern side. Yes to Lea Castle as that has been talked about for many years.	
CORE11	LPPO206	6-25	Comment	In line with the Core Strategy and NPPF any review of green belt should consider whether the district, has the full amount of statutory open and recreational space requirements already in place. Development in these areas would only make the shortages worse.	Comments noted.
	LPPO3766	Paragraph 6.26	Object	I object to the Council's strategy; the overall District housing requirements have been falsely derived.	Objection noted.
	LPPO2311	Paragraph 6.26	Object	6.26 - figures incorrect as based on rounding up, miscalculations and general poor calculations. Given this has not been done properly it makes the rest of the plan a nonsense!	Objection noted.
	LPPO4718	6.26	Comment	6.26 This paragraph mentions the HELAA (?) and says that there is potential for 1200 dwellings on Brownfield sites within the main towns and 600 on Lea Castle. So, another 2000 dwellings which added to the over 2000 dwellings already started or committed as shown in 6.4 takes us very near the total required by 2034. Or is some of this double counting?	This is referring to the housing capacity of potential site allocations on brownfield land within the main towns and the additional 600 at Lea Castle (pdl area). The point being made is that there is not enough brownfield land to accommodate all of the housing requirement. There is no double counting included in the figures.
	LPPO4719	6.27	Comment	6.27 Proposes the removal of 2% of all land from the Green Belt. Why? Given the above amount of housing	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local

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				<p>on Brownfield or already committed which does not require this to happen at this moment.</p> <p>Building houses takes time. I would imagine from watching the development on Silverwoods which is still not completed we are talking at least 10 years into the future before any release of Green Belt land needs to be considered and reviewed. We are all aware of how goal posts keep changing as Government's change and Brexit will have an influence as well as what happens in the rest of the West Midlands.</p>	<p>Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>
	LPPO4813	6.27	Comment	<p>We are told that this Local plan will only use 2% of the Green Belt. Why does this 2% have to be contiguous with the existing developments? Why can't this 2% be separated from the existing developments?</p>	<p>Development needs to be located in sustainable locations. Next to existing urban areas with local services are sustainable locations. The new development can also help to support and sustain the existing local services and create new ones. It can also lead to infrastructure improvements such as road junction improvements</p>
	LPPO3933	6.27	Object	<p>6.27 'Therefore to meet the needs of the growing population, removal of around 2% of all land from the Green Belt would be required'</p> <p>This statement would appear contradictory to the fact that the population of Kidderminster has remained static since 1991.</p> <p>The Assessment of Housing Need Report, Section 2</p>	<p>The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036. There will be a marked increase in the number and proportion of older residents. The population aged 65+years is expected to increase by 28.1% from 24,200 in 2016 to 31,800 in 2036. (Data based on ONS 2016-based Subnational</p>

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				<p>states that the 'Housing Market Area remains unchanged' it also states that 'latest mid year population estimate for Wyre Forest suggests a population of just over 99,500, a 2.7% increase since 2001, well below the Worcs figure of 6.7%, West Midlands, 8.9% and an average rate for England of 10.8%.</p> <p>I would suggest therefore that any reference to population growths would be more accurate if it were deemed, 'anticipatory' growths, and therefore risking removal of Green Belt land for, apparent unknown and unchallenged data, would seem too casual a step to take.</p> <p>Furthermore, 'an ageing population' would imply that natural changes in the current housing stock, would, within the Local Plan period, become available, to meet real or anticipated housing need.</p>	<p>Population Projections).</p> <p>This suggests that the population is not 'static'. For further information please see the updated OAHN Study which will be published on the Council's website during the Pre-Submission consultation.</p>
	LPPO3767	Paragraph 6.27	Object	<p>I object to the Council's strategy; evidence suggests that the population is stable and there is little need for large scale housing. The OAHN document dismisses three independent analysis. The planned urban extensions are unsustainable.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was</p>

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					consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
Wyre Forest Community Housing	LPPO1648	Para 6.27	Support	In respect of the Reasoned Justification (6.27), we fully support the expansion of the Kidderminster urban area and the utilisation of Green Belt land.	Support is noted.
	LPPO4720	6.28	Comment	6.28 The Council needs to work proactively together with not only landowners, developers and others who make money from this but with the people of the area it serves. Councillors are elected by us and we pay through our council tax for staff within the Council. Recent events both national and in London have demonstrated what happens when those serving us do not follow the needs and will of the people.	Comments noted.
	LPPO3768	Paragraph 6.29	Object	I object to the Council's strategy and to its distinction of Bewdley and Stourport as market towns; Kidderminster is also a market town.	Objection is noted. Kidderminster was not identified as a 'market town' in the currently adopted Local Plan (see para 5.33 of adopted Core Strategy.) Both Stourport-on-Severn and Bewdley benefitted from their status as 'market towns' under the Advantage West Midlands (AWM) Market Towns Initiative.
	LPPO3772	Paragraph 6.30	Object	I object to the Council's strategy and to its distinction of Bewdley and Stourport as market towns; Kidderminster is also a market town.	Objection is noted. Kidderminster was not identified as a 'market town' in the currently adopted Local Plan (see para 5.33 of adopted

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					Core Strategy.) Both Stourport-on-Severn and Bewdley benefitted from their status as 'market towns' under the Advantage West Midlands (AWM) Market Towns Initiative.
	LPPO3792	Paragraph 6.31	Object	I object to the Council's strategy and to its distinction of Bewdley and Stourport as market towns; Kidderminster is also a market town and should not be used for development unwanted in other areas.	Objection is noted. Kidderminster was not identified as a 'market town' in the currently adopted Local Plan (see para 5.33 of adopted Core Strategy.) Both Stourport-on-Severn and Bewdley benefitted from their status as 'market towns' under the Advantage West Midlands (AWM) Market Towns Initiative.
	LPPO161	6.31	Comment	Stourport is not and never has been a market town. It is correctly described below (6.34) as a canal town but today would be regarded as a Heritage town because of its important canal history. This distinction is important because it provides a focus on what is important about the town, its not shopping nor markets but history, protection of its heritage and tourism.	Objection is noted. Kidderminster was not identified as a 'market town' in the currently adopted Local Plan (see para 5.33 of adopted Core Strategy.) Both Stourport-on-Severn and Bewdley benefitted from their status as 'market towns' under the Advantage West Midlands (AWM) Market Towns Initiative.
Stourport on Severn Civic Society	LPPO1297	Para 6.32	Comment	The historic core of Stourport (Bridge Street, High Street, York Street) offers potential for improvement of flats above shops, enhancing both the townscape and providing residential accommodation.	Comments noted.
Stourport on Severn Civic Society	LPPO1295	Para 6.33	Comment	In Stourport the local infrastructure and road system are already at full capacity, particularly Stourport Bridge and the town centre one-way system. These are limiting factors to any increase in traffic flow.	Comments noted.

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	LPPO165	Housing Option B	Object	The option for additional housing to be built on Rectory Lane will increase already overly heavy traffic, especially at peak times. The Gilgal to the bridge is already subject to long periods of slow moving and even stationary traffic. This also backs up to areas as far as Worcester Road, Wilden Lane and beyond. This also hugely increases health risks from increases pollution from 'idling' engines. Any plan that that uses Green Belt land before fully exhausting all other options, especially Brown Field is to the detriment of future generations.	Objection noted.
	LPPO173	6.38	Comment	As a tourist destination, Bewdley needs a place for coaches to park, within close proximity to Load street to cater for elderly coach parties.	Comment noted.
Wyre Forest Green Party	LPPO1415	Para 6.39	Comment	For Bewdley, the summary states that new developments on Brownfield sites in or adjacent to the town centre are limited by various factors including the Welch Gate air quality management area. This AQMA has been in place since 2003. Despite an action plan the only measure implemented has been a change in priority at the junction of Welch Gate with Dog Lane. The only effective action would be changing Welch Gate to a one way traffic flow or other traffic management measures in Bewdley town centre.	Comments noted.
	LPPO607	Welch Gate air	Comment	Due the problems of stationery traffic it is surprising that the right of way has not been changed (say for 12 months) to monitor the Air Quality in Welch Gate.	Comment noted.

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		quality		Nothing has been done in the 10 years we have been here!	
Worcestershire County Council, Planning Economy & Performance	LPPO1135	Paragraph 6.41	Comment	Suggest amend to last sentence to read, "The provision of superfast and ultrafast broadband in addition to the availability of mobile infrastructure able to provide 2G, 3G, 4G and increasingly 5G coverage will be essential in developing the economic base of the rural areas."	Comment noted and agreed.
	LPPO4721	6.42	Comment	6.42 Horsiculture? Surely we don't need to use made up words.	Comment noted. 'Horsiculture' is the commercial development of the countryside for pasturing or exercising horses.
Land Research & Planning Associates Ltd	LPPO551	6.44	Comment	We agree that sustainable living in rural areas is as important as urban areas though do not see how this is being addressed.	Comment noted. It is being addressed through the policies within this emerging Local Plan, some of which relate specifically to rural areas.
	LPPO3680	6.44	Object	6.44 There is no evidence to support how this element will be satisfied. Commuting further distances will be the result of the increased development as Kidderminster becomes a soulless commuter town.	Objection noted.
Land Research & Planning Associates	LPPO552	6.45	Support	It is essential that the Revised Local Plan needs to take into account the points made previously.	Support and commented noted.

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CORE11	LPPO238	6-45	Support	Support for paragraph 6.45.	Support noted.
Summerfield Against Land Transformation	LPPO1616	6.45	Comment	We reject your approach to the Local Plan and its reliance upon housing, indeed being housing led. Given both the population dynamics and economic concerns we believe that your strategy should be reversed i.e. it should be economic development led. You should seek to stimulate the economy e.g. rate relief and grant giving, work more closely with local employers e.g. with SVR and the Safari Park, seek to stem job losses and improve educational performance and thus the qualification base of the workforce. It is our belief that such a course would stimulate the economy, create vibrancy and lead to and support subsequent housing development.	Comment noted. The Local Plan also has an employment land requirement to meet. See the Employment Land Review Study for further details. This ELR study has helped to inform the plan and the sites allocated for employment use.
	LPPO3681	6.46	Object	6.46 How will extra monies be available? There is no evidence in your proposals. How will Kidderminster fund the extra health, transport, waste disposal, schools, pre-schools and nurseries, care in the community, libraries and parks to name but a few of the services which will be under greater demand. I understand there are monies to be made available for developments in Churchfields urban village – but there is no evidence in your plans to show how this will benefit the Spennells side of Kidderminster. The grants you propose will be received from the	The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements for the emerging Local Plan.

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				Government, local enterprises and private investment will be insufficient to fund the needs of the huge influx of residence you propose.	
Worcestershire County Council, Planning Economy & Performance	LPP01137	Paragraph 6.46	Comment	<p>This paragraph usefully makes reference to the securing finance for the implementation of sufficient supporting infrastructure, and the need for a critical mass of development to enable the effective provision of sufficient infrastructure, which we support. This raises two additional issues:</p> <ol style="list-style-type: none"> 1. Cross reference to comments on the infrastructure delivery plan and the viability assessment which provide evidence of both the infrastructure need and the financial challenge that exists in securing contributions. In particular that it is unlikely that development alone will pay for the delivery of infrastructure and external funding will be required from different sources. 2. Some of the infrastructure required may be outside of Wyre Forest District because of the impact of Wyre Forest residents and businesses on the wider transport network, for example. Whilst schemes outside of the district cannot be allocated in this local plan, they can be listed in the IDP and the second bullet on the provision of infrastructure could be expanded to include: "to enable effective provision of directly related infrastructure in the district and in 	Comments noted. We look forward to working with Worcestershire County Council as we shape the Infrastructure Delivery Plan further for the emerging Local Plan.

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				<p>neighbouring authorities".</p> <p>The final sentence in 6.46 may risk raising unrealistic expectations, especially as the term "real benefit" is abstract, and would benefit from qualifying, such as real benefit to the district as a whole.</p>	
	LPPO3749	Paragraph 6.46	Object	<p>I object to the Council's strategy and thinking for development, linked to funds becoming available to justify the scale of development. We do not need towns to grow beyond their natural size for their setting by adding more roads, schools, shops and industrial units on the outskirts of the town centres. Instead regenerate its town centres.</p>	<p>The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements for the emerging Local Plan.</p>
	LPPO3786	6.47	Object	<p>Persimmon Homes, inadvertently, provided the catalyst to the level of debate that the residents of Wyre Forest now find themselves involved in. I personally believe the Green Belt Review and the LPR document would have slipped through very much unnoticed if Persimmon hadn't made a fundamental mistake.</p> <p>I do not feel the consultation process to be fair, inclusive or within the spirit of the NPPF. I have had to actively seek access to all documents that have helped shape my opinion — even requesting that documents were correctly, chronologically ordered on WFDC portal. The language and terminology used can be at best described as ambiguous. This would have negated</p>	<p>The Preferred Option Plan and the supporting evidence base documents were made available on the Council's website for public viewing throughout the whole of the consultation period, and remain on there now. The documents were also available at the eight drop-in sessions held throughout the District during the consultation event. Hard copies of the Preferred Options Plan was also available at the Council Hob and local libraries in the District.</p>

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				many residents being able to fully comprehend the magnitude of the proposed options. I believe the Local Plan Review to be biased in its writing and a cynical approach taken to the presentation and timing.	
	LPPO3794	Paragraph 6.47	Object	I object to the Council's strategy and thinking for development. There is no objective evidence to support the perceived large scale development. The figures are false, derived for the Council as a paid contractor which is dismissive of independent analysis. The scale of development is unnecessary. It is poor land use policy to simply blight perfectly good Green Belt due to the Council's inability to drive through good efficient development of Brownfield and inner town development. Simply adopting the least resistance is a mark of poor direction and ability by the Council. This provided residents with low confidence of the ability of the Council to properly look after its existing residents to the Area and points to it not having the required skills in place to tackle more challenging issues.	There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	LPPO4149	6.47	Object	<p>Fairness should be observed – currently the Local Plan is biased towards Option A which unfairly shoulders the greatest loss of Green Belt and the greatest number of new houses built in one big mass, as well as a new road cutting straight across the peaceful countryside.</p> <p>The Local Plan is written in totally biased language. Examples are seen in Table 6.06, Comparison</p>	Objection and comments noted.

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				<p>of Option A and Option B:</p> <ol style="list-style-type: none"> 1. Option A looks to minimise the number of sites in a more concentrated strategy whilst for Option B a greater number of sites will be required and overall a more dispersed strategy 2. Option A is more likely to enable viable provision of affordable housing 3. Option A enables the building of Kidderminster Eastern Relief Road which would: 4. Provide access for the new development to the east of Kidderminster 5. Enable S-NE traffic to by-pass Kidderminster altogether en route to M5 motorway and Birmingham 6. Help relieve congestion on A449 and in Kidderminster (Ring Road, Horsefair etc) 7. Help facilitate an improvement in AQMA at Churchfields (<i>what does this mean?</i>) 8. Option A will not impact as much on A451 and A449 as larger Lea Castle Scheme (Option B) 9. Option A maximises the benefit of proximity to Kidderminster rail station (<i>It is at least 2 miles and unwalkable</i>) 10. Whereas Option B would not enable the building of the Kidderminster Eastern Relief Road and the benefits this scheme allows 11. In Option B -Additional development at Lea 	

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				<p>Castle will put additional pressure onto A451 and A449 from the north into Kidderminster</p> <p>12. In Option B – Additional development to west of river, particularly at Arley Kings is likely to have a negative impact on Stourport on Severn and the river crossing</p> <p>It is clear that the planners favour Option A on the basis that they can have a new Eastern Bypass that was denied them years ago when original scheme was scrapped.</p>	
	LPPO4834	6.47	Object	<p>The Local Plan has been designed to present the case as a clear choice between Option A or Option B, although some clarification has now been offered that all aspects of the Plan can still be challenged. This has meant that local people were being asked to comment upon a Plan which was not fairly or accurately presented. The Plan as presented was clearly weighted towards the so-called advantages offered by Option A (such as the building of an Eastern Relief Road), while presenting the disadvantages of choosing Option B (less provision of local infrastructure). The architects of the Plan had clearly already decided which Option they preferred so the Plan was not offered in a balanced or even-handed way, thus not presenting the case fairly.</p>	<p>Objection noted. Comments could be made on any of the sites within the plan and the large number of consultation responses we have received has proved that this worked effectively. In particular, para 6.57 of the Preferred Options document asked specifically if there were any other alternative options that the public would like to suggest.</p>
	LPPO4783	6.47	Object	<p>I object to the unfairness of weighting given to the paragraphs 6.55 and 6.56. Option A is proposed in a positive light, stating what it could supposedly help</p>	<p>Objection and comments noted.</p>

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				and Option B is placed with negative arguments about possible problems it might entail. This means that the initial proposal has been made on unfair grounds, with its influential wording affecting people’s thoughts, before giving them a fair chance to look at the pros and cons independently and giving them a fair chance to make up their own minds.	
	LPPO4867	6.47	Comment	I would urge the Council to review its housing need and figures, and guarantee that all Brownfield sites are used before any Green Belt land is released.	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.
	LPPO5129	6.47	Comment	<p>The Wyre Forest DC plan was not put forward in a fair way. The campaign against it did more to publicise it than the council did. The council intended to hold no drop-in information event for Spennells, the area most affected by the proposal, despite other less affected areas getting such drop-in events. Why not? There only was one in Spennells thanks to the effort of a Spennells councillor to stop this bias.</p> <p>The plan itself presents the Core build sites as non-</p>	Objection noted. Comments could be made on any of the sites within the plan and the large number of consultation responses we have received has proved that this worked effectively. In particular, para 6.57 of the Preferred Options document asked specifically if there were any other alternative options that the public would like to suggest.

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				negotiable and pressures residents to support Plan A as the "preferred" plan, discouraging anything but picking A or B or objecting to any part of the Core, such as behind Spennells.	
	LPPO2936	Paragraph 6.47	Object	<p>How does the Local Plan ensure deliverability? Greenfield sites are cheaper to develop and are very attractive to developers and conflict with the profitability of Brownfield sites, where issues of existing and precious old buildings, land clearance and cleansing constrain profits. The LPR must make clear stronger requirements for the development of the Green Belt released sites, the need to ‘add’ environmental gain. Details are given for the need to relieve traffic congestion in Kidderminster with the Eastern Relief Road, but robust green infrastructure is also vital to enhance new and existing communities.</p> <p>The viability problems of Brownfield sites seem to be lacking any solution, so areas will remain blighted for the plan period. There are significant landscape considerations for wide rural and Green Belt areas of the district, whereas for others who live in more urban areas, landscape value is just as significant and should be evidenced as such, through robust policy for the development sites. It is not just a matter of funding a new road, but ensuring other areas are developed on an economic level playing field.</p> <p>It would be appropriate to see a similar set of</p>	Objection and comments noted.

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				<p>safeguards for these proposed release areas as exist for rural areas of Wyre Forest, to ensure a high standard and positive contribution to make a place ‘unique’. Clear parameters for green infrastructure would even the economic playing-field of development.</p> <p>In proposing release of Green Belt, policy addressing environmental matters such as sustainably built housing- low carbon and greenhouse gas emissions and ability to accommodate the impacts of climate change over the plan period are not given sufficient importance for the development process. These matters should be evident in the LPR, so these sites contribute to the locality in the way that rural areas can and do.</p>	
Hurcott Village Management Committee	LPP01625	6.47 - viability	Comment	Large areas of Wyre Forest, currently owned by developers who have designated planning permission, are not being developed due to a lack of financial viability. While these areas remain undeveloped Wyre Forest is being forced to consider other sites. Surely the structure and details of the Local Plan should be in the hands of WFDC and not potential developers.	Comments noted. The Council does work with developers/landowners to bring forward the more challenging sites on brownfield land for development. The Council will also use its compulsory purchase powers where necessary.
Spennells Against Further Expansion	LPP01744	6.47	Object	It is remiss of Wyre Forest District Council that they did not make it clear early enough to residents that all areas suggested in the draft local plan can be commented upon. Many people are of the impression that they have to choose between one of two packaged-up options and that “Core” areas which are	Objection noted. The Sustainability Appraisal and the Site Selection Process Topic Paper set out the process the Council has undertaken to identify the proposed allocation sites. The HELAA document has also informed this process. These documents will be available for

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				<p>incorporated in both options are a “done deal”.</p> <p>By presenting the Draft Local Plan proposals in this way, the District Council has effectively disenfranchised comment. It is only recently (Express and Star 3/08/17) that the WFDC press releases have not implied a fixed choice. By changing the presentation of the consultation mid-way through, not all residents have had time to understand that any site can be commented upon or alternative suggestions be made.</p>	<p>public viewing during the pre-submission consultation.</p>
Taylor Wimpey West Midlands	LPP01491	Paragraph 6.47	Comment	<p>Urban Extensions vs Dispersal</p> <p>In addition to a 20% buffer different types of sites in different locations should be included. If one/ two large urban extensions are exclusively proposed to deliver the dwelling requirement, there is the risk that in the short term no dwellings will be delivered as the administrative tasks associated with large schemes inevitably take longer to be processed, there are possibly multiple land owners that will need to be satisfied when preparing and executing the S106 and often significant infrastructure is required and is necessary to be delivered before the construction of dwellings can commence. An example of where this have recently happened is in Rugby Borough, where only two large urban extensions were proposed and as a result of the issues identified above, the Council</p>	<p>Comments noted.</p>

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				<p>failed to demonstrate a five year land supply (which is still the case and has been ever since their Core Strategy was adopted in June 2011). One of the two extensions, due to its scale, will now not be required within the plan period. The Council is now rectifying this issue through a review of the Plan, which extends the plan period and includes new smaller deliverable sites to plug the gaps.</p> <p>Whilst it is good planning practice to reap the benefits of large scale development on the urban edge to comprehensively plan a neighbourhood and secure the delivery of required infrastructure, it is important that housing delivery is maintained throughout the plan period to enable households to form as and when they need to. The best way this can be achieved is through identifying additional sites elsewhere in the District. Further, different housing needs and preferences exist across the District and, therefore, to provide choice and variety to households, in a sustainable manner, is beneficial. This is particularly so when new housing is often a more popular choice for first time buyers given the support provided through the successful ‘Help to Buy’ initiative. Alternatively, households may choose to relocate elsewhere outside of Wyre Forest, which would be potentially detrimental to the local economy.</p> <p>Whilst housing should be located in the most sustainable locations from the perspective of</p>	

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				<p>minimising the need to travel, there are a number of social benefits to locating homes in more rural locations (i.e. sustaining local services, allowing families to live nearby relatives and, inevitably, achieving a balanced population to help a location to thrive). Development can bring with it much needed facilities and infrastructure to communities, which could improve the quality of life for residents. It is therefore important that a reasonable level of development is dispersed to deliver sustainable communities across Wyre Forest. This should, however, not undermine the vision for a comprehensive urban extension to the south and east of Kidderminster and the strategic benefits this could deliver.</p> <p>In terms of the proposed options put forward by Wyre Forest in the Preferred Options Draft Local Plan Review, Option 'A' seeks to locate concentrated development outside the main towns to two urban extensions and Option B seeks to deliver two smaller urban extensions and a more dispersed strategy elsewhere. Whilst both options have their merits, it is considered that a combination of both Option 'A' and 'B' would provide both deliverable and sustainable growth in Wyre Forest for the reasons identified above.</p>	
	LPPO4643	6.47	Object	The Local Plan is not in accordance with the guidelines	Objection and comments noted.

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				<p>for Public Consultation and recognised best practice so should be revisited and also cover Blakedown.</p> <p>I believe the plan/some supporting documentation is biased to Option A.</p> <p>The promise to develop all brown field sites before Green belt seems false.</p> <p>I think we need 3000 houses not 6000 on a site to include a Drs/school with only Lea Castle/land behind Spennells and the Comberton/Offmore Core being big enough.</p>	
	LPPO4829	Development Strategy	Comment	<p>The plan identifies as Core Sites the development of 3640 dwellings, the bulk of which fall in Green Belt on the eastern side of Kidderminster. In particular (OC/6), (OC/13) and (WFR/ST/2). In addition Option A includes (WFR/ST/2) and (AS/10) together providing together 930 dwellings.</p> <p>Firstly I would question the need for the provision of an additional 5400 dwellings and therefore the need for substantial development on the Green Belt. I would question whether there has been a rigorous enough assessment of Brownfield sites within the District.</p> <p>The Strategic Housing Land Availability Assessment shows a potential of 4475 dwellings which would go a</p>	<p>Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				<p>long way to meeting housing need. I would contend that these are obvious Brownfield sites. If Kidderminster is to be promoted as a vibrant “city living location” there may well be scope for further mixed use redevelopment within the town.</p>	
	LPPO4749	6.47	Object	<p>I personally believe the Green Belt Review and the LPR document would have slipped through very much unnoticed if Persimmon hadn’t provided the catalyst to the level of debate that the residents of Wyre Forest now find themselves involved in.</p> <p>I believe the Local Plan Review to be biased in its writing and a cynical approach taken to the presentation and timing. Land should be sold as Green Belt/agricultural land and the value reflected as such – especially as this is still a consultation period.</p> <p>Otherwise in my opinion it looks as if it is inducement and allows developers to land bank and bully local councils. The fields were neglected for the purpose of photographs (whilst previously rotational fallow field farming practiced).</p> <p>I also feel concerned that areas are ringfencing themselves with ‘Neighbourhood Plans’ with Stone Parish Council (of which 40% of the proposed Option A falls within), lagging behind.</p> <p>Planning, has made many mistakes that have led to the</p>	<p>Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				<p>downturn of the town centre. It was only a matter of time once Crossley Park and Weavers Wharf were developed that flagship stores would move to a location with doorstep parking. The development of the new leisure complex out of town is a huge blow to Kidderminster town centre, and is rife with errors of its own. The new relief road has only managed to move traffic issues from Stourport Road Island further down A449 towards Hoobrook. Impacting on Spennells Valley Road, Wilden Lane and A449 Northbound from Black Bridge.</p> <p>The future of Kidderminster must start with rejuvenation of the town centre spreading outwards. The large units will never attract new business. The current financial climate would make the risk of undertaking a retail unit of that size too great. Breaking the buildings up into low rise apartments with small artisan retail units interspersed would be the best option. Include pockets of green space and trees, with seating. The local schools and college should be encouraged to run small businesses as part of educational programmes. Design students encouraged to group together and run a cooperative – showcasing their individual talents. The canal side and tourism exploited for its maximum potential. The access routes into the town centre need to be made safer and more attractive. On the protest march I noted the extent of the vandalism and stench in the underpass – I certainly</p>	

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				<p>wouldn't walk there alone or encourage my daughters or any tourist to.</p> <p>Offering Option A or Option B is a divisive and dangerous tactic – one that splits communities and gives way to resentment. Who am I to say that the Green Belt in Kidderminster is more important than the Green Belt in Stourport? If the projected growth figures are accurately calculated it will be unnecessary to develop on any Green Belt land. If WFDC harnessed the passion raised by this consultation and worked with residents then maybe we may achieve something lasting and worthwhile.</p> <p>I must ultimately conclude that WFDC are happy to support a document that is biased in its writing and statistically incorrect; or the Councillors themselves are not qualified to read and interpret the data presented. If this is so then the residents of Wyre Forest are not being offered a fair and inclusive consultation. I urge WFDC and politicians at every level to listen to the residents – the very people who elected you, the very people you represent, the very people who you serve.</p>	
	LPPO4777	6.47	Object	<p>Bias in structure of “options”.</p> <p>The Sustainability Appraisal describes the two options presented in the Draft Local Plan as follows: <i>A.13 The</i></p>	<p>Objection noted. Comments could be made on any of the sites within the plan and the large number of consultation responses we have received has proved that this worked</p>

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				<p><i>preferred options are for Option A to be more contained with an urban extension to the east of Kidderminster and for option B to be a more dispersed approach.</i></p> <p>WFDC website describes the Draft Local Plan proposal this way: <i>The Preferred Options document sets out 2 possible options for potential sites of new development. It seeks to identify and allocate land only, detail for each site would be subject to a planning application.</i></p> <p>WFDC did not make it clear early enough to residents that <u>all areas suggested</u> in the draft local plan could be commented upon. Many people are of the impression that they have to choose between one of two packaged-up options and that “Core” areas which are incorporated in both options are a “done deal”.</p> <p>In The Shuttle of 15th June, the consultation is presented this way: <i>The council is proposing two options - one option sees additional development concentrated to the east/south of Kidderminster, while the second option would see growth more widely dispersed, particularly around Stourport and adjacent to Lea Castle.</i></p> <p>By presenting the Draft Local Plan proposals in this way, the District Council has effectively</p>	<p>effectively. In particular, para 6.57 of the Preferred Options document asked specifically if there were any other alternative options that the public would like to suggest.</p>

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				<p>disenfranchised comment.</p> <p>It is only towards the end of the consultation that the WFDC press releases have changed their tune. For example, the Express & Star (3 August 2017) quotes from the WFDC press release this way: <i>Comments can be made on any of the sites proposed for development and alternative suggestions made before 5pm on August 14. The final draft plan may include a combination of sites from the options put forward and from new suggestions.</i></p> <p>There is no strong push here for the two preferred options. By changing the presentation of the consultation mid-way through, not all residents have had time to understand that any site can be commented upon or alternative suggestions be made.</p> <p>Bias in Content of “Options”</p> <p>In the presentation of the two preferred options (in Appendix E of the Sustainability Appraisal), Option A appears to have more plusses and less minuses than Option B. However, this is false for the following reasons:</p> <ul style="list-style-type: none"> • The “Eastern Relief Road” is not necessarily a benefit. • There is no evidence that a road, for which 	

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				<p>there is no detail, will “help reduce traffic congestion in the town centre”.</p> <ul style="list-style-type: none"> • Option A is claimed to have a significant improvement “on traffic issues and the AQMA around the Horsefair in Kidderminster.” Any traffic amelioration measures which take place at the Horsefair can be done in conjunction with a redevelopment of the sites at Churchfields and are completely independent of housing development and roads at Spennells. • There is a claim that Option A will “enable more effective school provision” by concentrating over 1000 homes in one area – however, there is no guarantee any school will be built. • Concentrated development to the east of Kidderminster is said “to provide additional services and facilities such as infrastructure, shop, school, cycleways and footpaths.” This could equally be said for a concentrated development in any area. 	
	LPPO4916	6.47	Object	I believe the plan is biased to Option A as is some of the supporting documentation. Also, it is fact that no “drop in session” was originally planned for the impacted people of Spennells which is another indication of unacceptable bias to Option A	Objection noted.

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	LPPO2734	6.47 Document Bias	Comment	<p>Wyre Forest District Council (WFDC) demonstrate a biasedness towards Option A throughout the Local Plan and as such I particularly object to Option A; the large scale, landscape dominating development, located on the periphery of Kidderminster which would not be sustainable in relation to access to existing infrastructure (particularly public transport and sustainable transport infrastructure). The Local Plan states that Option A would “maximise the benefit of proximity to Kidderminster rail station and links to the national rail network”. Kidderminster station is over two miles from the proposed location of Option A and this distance is not considered to be within the boundaries expected.</p> <p>It is evident that the ambition to construct a bypass is the focus of this option and the housing is the secondary priority, which is contrary to the guidance included in Manual for Streets. Air Quality and noise impacts are national priority with policies such as Clean Air Zones increasingly common place. The Local Plan states that Option A would “help facilitate an improvement in AQMA in Churchfields”, however constructing a bypass to “enable S-NE traffic to bypass Kidderminster altogether en route to the M5 motorway and Birmingham” suggests that there is unlikely to be any net change in air quality across Kidderminster. Regardless of housing delivery, is there not an option to upgrade the existing road network</p>	Comments noted. The Infrastructure Delivery Plan (IDP) sets out what infrastructure requirements will be required to support the emerging Local Plan and the funding that will be required to delivery this infrastructure. A Transport Assessment study is being undertaken as part of the final stage of Plan making and will be made available for public viewing during the Pre-Submission consultation.

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				<p>such as the A450/Worcester Road – if a road can be delivered over a rail track then there are not any reasons to suggest that the bridge with the A449/A450 could not be improved? In addition, Spennells Valley Road is good quality and rarely suffers from congestion – it’s the Worcester Road/Chester Road/Wilden Lane roundabout that is the issue.</p> <p>Based on the documents within the public domain, WFDC do not have a robust evidence base to objectively demonstrate that Option A is a viable site for housing. Engineering constraints such as the rail track and lack of physical boundary to redefine the Green Belt make delivering housing and the bypass undeliverable, particularly if you are to achieve your affordable housing targets (as WFDC are likely to want developer contributions towards the bypass). Stanklyn Lane cannot be used as a physical boundary to redefine the Green Belt as this would result in the merging of two distinct places, which is contrary to the National Planning Policy Framework guidance. In addition, at the drop-in consultation sessions, WFDC stated that they have not completed any transport modelling or early assessment work to prove that an Eastern Bypass would relieve congestion or that the levels of demand are likely to justify the construction of a bypass (and offer value for money). If no technical work has been completed that suggests that the Eastern Relief road could benefit Kidderminster’s</p>	

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				<p>highway network, then WFDC should not be stating the potential benefits of the road. Alternatively, if WFDC have completed some initial feasibility work then they should be sharing this with the public. However, the fundamental issue with identified this site in the first place, as with all the other sites, is the poor technical evidence informing the identification that 5,400 (300 per annum) houses are needed over the Plan period. The Local Plan states that Option A would “help facilitate an improvement in AQMA at Churchfields”. This statement also suggests that some level of transport modelling has been undertaken and if it has not, then this statement is misleading and misinformed.</p> <p>The Local Plan also states that Option A will “help facilitate Kidderminster regeneration”, however the Green Belt Review Strategic Analysis (September 2016) suggests that the majority of the sites proposed in the Local Plan including Option A have a “low contribution” to regeneration. It is not clear from this document whether they will have a low contribution in terms of being developed in future or whether they currently have a low contribution. Nonetheless, Option A scores the same as many of the parcels in Option B and as such Option A contributes no more to regeneration than Option B does, hence the statement in the Local Plan is incorrect based on the assessment in the Strategic Analysis document.</p>	

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	LPPO3826	6.47	Object	The Draft Local Plan has been presented with a definite bias in favour of Option A (eg. Appendix E of the Sustainability Appraisal). Promises of improvements in infrastructure to meet the demands of new residents should also apply to Option B. The repetition of the “benefit” of an Eastern Relief road only available in Option A is not only biased, it is completely lacking in evidence. No route or traffic model has been provided; claims made that such a road would help regenerate Kidderminster and improve air quality at Churchfields lack any factual evidence; the A450 already takes traffic from the A449 to the A448 and the A456 so a “relief road” is not needed. A new road would in fact bring increased air and noise pollution to the heavily populated Spennells estate as well as causing distress to local wildlife.	Objection and comments noted.
	LPPO2665	6.47	Object	I believe the plan is biased to Option A as is some of the supporting documentation. Also, it is fact that no “drop in session” was planned for the impacted people of Spennells which is another indication of unacceptable bias to Option A.	Objection and comments noted.
Wyre Forest Green Party	LPPO1480	6.47	Object	It is remiss of Wyre Forest District Council that they did not make it clear early enough to residents that all areas suggested in the draft local plan can be commented upon. Many people are of the impression that they have to choose between one of two packaged-up options and that “Core” areas which are	Objection noted. The Sustainability Appraisal and the Site Selection Process Topic Paper set out the process the Council has undertaken to identify the proposed allocation sites. The HELAA document has also informed this process. These documents will be available for public viewing during the pre-submission

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				<p>incorporated in both options are a “done deal”.</p> <p>By presenting the Draft Local Plan proposals in this way, the District Council has effectively disenfranchised comment. It is only recently (Express and Star 3/08/17) that the WFDC press releases have not implied a fixed choice. By changing the presentation of the consultation mid-way through, not all residents have had time to understand that any site can be commented upon or alternative suggestions be made.</p>	consultation.
Gladman Developments Limited	LPPO1419	para. 6.48	Object	Gladman note suggested provisional requirement of 6000 dwellings against requirement of 5400 giving a 10% contingency against claimed OAN. However, we would recommend using a 20% contingency made up of small and medium sized sites across wide range of sustainable settlements throughout the hierarchy. This would demonstrate an effective strategy that provides sufficient flexibility against reliance on large strategic sites and Brownfield sites. Likelihood of large strategic sites delivering beyond plan period should be acknowledged. If BW FOAN figure is used then requirement would be 7171 dwellings (332 x 18 +20%) rather than 6000.	There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	LPPO4722	6.48	Comment	6.48 The figures in the table 6.0.3 do not appear to reflect the figures given in other council sources for the amount of dwellings nearly completed and in the pipeline. There is no timeline in these figures. Are they	Comments noted. The dwelling completions in the table were the number of completions since 1 st April 2016 up to 1 st April 2017. This information will be further updated in the pre-

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				<p>are what is proposed immediately, what is in the pipeline already and what is assumed to be available from the 2 Options we are asked to comment upon? As mentioned in my comments on 6.4 about the published figures to not relate to the numbers in this table so a fuller explanation of what the council has already agreed to, what is likely to happen anyway within the 2 options (Sladen School, Sion Hill, Victoria Cricket Ground et al) so that the residents in these areas can make informed comments rather than just the NIMBY response that lack of clarity encourages.</p>	<p>submission plan document and the Five Year Housing Land Supply Report.</p>
	<p>LPPO3798</p>	<p>Paragraph 6.48</p>	<p>Object</p>	<p>I object to the Council’s strategy and thinking for development; here is no requirement to allocate in excess of a perceived housing requirement of 5400 dwellings.</p>	<p>There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<p>LPPO481</p>	<p>paragraph 6.49</p>	<p>Object</p>	<p>I do not believe there is a shortage of properties required therefore we do not need to release more land.</p>	<p>There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to</p>

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					inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	LPPO3800	Paragraph 6.51	Object	I object to the Council's strategy for development; evidence shows that the scale is unnecessary. However I prefer Option B notwithstanding I object to the analysis re scale of development.	Objection noted.
	LPPO4012	Paragraph 6.57	Comment	Surely it would be much wiser to relocate to Stourport or Kidderminster where the current travelling community reside. Especially as the roads would be more suited to heavy traffic. I hope you read through all of the points raised before making your final decision, thank you for taking the time to do this.	Comments noted.
	LPPO482	paragraph 6.51	Object	I object to both Option A and B	Objection noted.
	LPPO400	6.51	Object	<ul style="list-style-type: none"> • I object to Option A and Option B. • Green Belt land should be used only as a VERY LAST RESORT. • Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collaborate and 	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need

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				<p>collectively review overall Brownfield site availability and plan housing development accordingly – decisions to build on the Green Belt should not be based on local authority boundaries.</p> <ul style="list-style-type: none"> • The 5 year rolling time frame for construction sites should allow for regular reviews of Brownfield sites and enable changes to be incorporated into any plan. • The plan fails to recognise changes in shopping habits and unrealistically targets retail expansion and comparison shopping. Kidderminster has suffered from the failure to 'tidy up' following the migration of Kidderminster town centre to Weavers Wharf and Crossley Retail Park. Many retail premises left behind have been empty for 8 /9 years. The regeneration of such sites require radical solutions for alternative use that reduce any need to build on the Green Belt. On this basis unnecessary decisions are being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping (indeed, the plan itself demonstrates an inability to predict /understand short term population levels in the District). • The plan fails in its stated aim to. Instead it aims to justify what developers want to deliver 	<p>is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				<p>rather than meet the needs of Kidderminster residents.</p> <ul style="list-style-type: none"> • Previous attempts to build an Eastern relief road have failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph road following the same route as the existing road from the Worcester Road through Mustow Green to the Birmingham Road - is it really a relief road at all? • Whilst at first sight constructing a new school in the Spennells area appears attractive this (together with the promise of the 'relief road' shouldn't be the determining factor when opting to build on the Green Belt – other options should be sought. • Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years. This situation equally relates to the areas covered by the LEPs identified in the plan. • Whilst economic development in Kidderminster will be welcome - past experience shows this will take time – in the meantime people will continue to travel. • The immediate need is for fresh radical 	

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				<p>thinking that optimises the use of Brownfield sites throughout the LEP areas for residential use and enables Kidderminster itself to become a modern, contained and attractive town centre that incorporates retail leisure and residential opportunities rather than pursue outdated models from the past - 'mixed use' communicates little other than the elements of 'wishful thinking' so often reported in the local press over numerous years.</p>	
	LPPO422	6.52	Object	<p>I object to Option A and Option B.</p> <p>Green belt land should be used only as a VERY LAST RESORT.</p> <p>Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collaborate and collectively review overall brown field site availability and plan housing development accordingly – decisions to build on the green belt should not be based on local authority boundaries.</p> <p>The 5 year rolling time frame for construction sites should allow for regular reviews of brown field sites and enable changes to be incorporated into any plan,.</p>	<p>Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				<p>The plan fails to recognise changes in shopping habits and unrealistically targets retail expansion and comparison shopping..</p> <p>Kidderminster has suffered from the failure to 'tidy up 'following the migration of Kidderminster town centre to Weavers Wharf and Crossley Retail Park.</p> <p>Many retail premises and the courts building have been empty for 8 /9 years - the regeneration of such sites require radical solutions for alternative use that reduce any need to build on the green belt.</p> <p>Unnecessary decisions are being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping (indeed, the plan itself demonstrates an inability to predict /understand short term population levels in the District).</p> <p>The plan fails in its stated aim to "to use a robust and up-to-date evidence base to ensure that the local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" . Instead it aims to justify what developers want to deliver rather than meet the needs of Kidderminster residents.</p> <p>Previous attempts to build an Eastern relief road have</p>	

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				<p>failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph road following the same route as the existing road from the Worcester Road through Mustow Green to the Birmingham Road - is it really a relief road at all?</p> <p>Whilst at first sight constructing a new school in the Spennells area appears attractive this (together with the promise of the 'relief road' shouldn't be the determining factor when opting to build on the green belt – other options should be sought.</p> <p>Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years. This situation equally relates to the areas covered by the LEPs identified in the plan.</p> <p>Economic development in Kidderminster will be welcome - past experience shows this will take time – in the meantime people will continue to travel.</p> <p>The immediate need is for fresh radical thinking that optimises brown field sites throughout the LEP areas for residential use and enables Kidderminster to become a modern, contained and attractive town centre that incorporates retail leisure and residential</p>	

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				opportunities rather than pursue outdated models from the past - 'mixed use' communicates little other than the elements of 'wishful thinking' so often reported in the local press over numerous years.	
Campaign to Protect Rural England	LPPO923	Table 6.0.1	Object	We believe the Plan's Housing Requirement is not the Objectively Assessed Need, but a highly subjective one, taking into account irrelevant factors. The 2016 OAHN Amion report came up with a figure in line with recent delivery and this is a good indication of what is needed. Our report (see attached) shows an OAHN of 229 pa making a total of 4122 over the plan period. This is not much more than urban and Brownfield capacity and would need minimal Green Belt release.	There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	LPPO155	6.0.1	Comment	My comments relate to the housing needs assessment and the impact it has on the proposed sites allocation later in this document. Whilst I have no issue with the detailed assessment carried out by Amion, I do not believe the conclusions reached are sufficiently robust to justify the proposed allocation of green belt land at this time. The report suggests that the housing needs assessment indicated additional homes ranging from 199 per annum (SNPP) to 291 per annum, but they proposed 300 per annum.	There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.

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				<p>This is an odd conclusion given that:-</p> <ol style="list-style-type: none"> 1. The average supply over the last 10 years has been 255 per annum and only in 2 years has 300 been exceeded. 2. The report says that over that time there has been "virtually static population growth". 3. Local industry is in decline and the impact of Brexit is likely to be negative for the local economy and growth. 4. The report states that, at a point in time, there were 1,404 vacant dwellings, but no allowance is made for filling these in the figures. 5. There seems to be no allowance for infill development, windfall sites and rural exception sites, nor has any account been made for the conversion of commercial property to provide, for example, flats in the town centre. <p>It is my contention that a more realistic needs figure would be about 250 per annum, midway in the range of figures quoted in the Amion report and also close to the average of previous years. This results in an 18 year requirement of 4,500 homes, 900 fewer than the recommendation.</p>	

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				<p>If allowances were made for other sources of housing provision as follows, then the need for green field land is reduced:</p> <ol style="list-style-type: none"> 1. Assume 30% of vacant dwellings will reoccupied over 18 years, equating to 421 in total or 23 per annum; 2. Allowing 10 units to be provided by infill per annum equates to 180 over 18 years; 3. Allowing 10 units to be provided by conversion of commercial property per annum equates to a further 180 over 18 years; 4. Allowing for 5 rural exception site units to be provided per annum equates to 90 over 18 years; <p>which add up to a 871 units over 18 years. This reduces the new build requirement to 3629 (4,500-871). These figures almost completely satisfy the requirement shown in table 6.0.3 below without the need for green belt land at this time.</p> <p>It is my submission that the housing need figures be reviewed as my comments suggest.</p>	
	LPPO293	6.0.1	Comment	Figures take Wyre Forest as a whole. May be useful to look at the need for affordable housing, in each of the	Comments noted.

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				three towns individually as the percentage of affordable to market driven may vary immensely.	
	LPPO4717	6.0.1	Comment	<p>There is a table in this section which shows a requirement for 5400 dwellings during the period of this report with an annual total of 300 (gained by dividing this total by number of years of the plan).</p> <p>When I look at the document called 'Housing Delivery in Wyre Forest 2015/16 from the Council's website. It shows that:</p> <ul style="list-style-type: none"> • At the end of March 2016 there were 441 dwellings under construction • In table 4 'Wyre Forest Housing Commitments as at April 1st 2016' it shows 1583 dwellings as being already committed <p>If these figures are right (and they are Council figures) then over 2000 dwellings are already in the pipeline towards the total of 5400. It would therefore be useful to have an understanding of where these actual and proposed dwellings are sited so that we can comment on the proposals set out in this document which covers much of the same time period.</p>	The Five Year Housing Land Supply Report sets out the commitments since 1 st April 2016. This report can be found on the Council's website.
Victoria Carpets	LPPO1501	Housing Development	Comment	The increase to 300 units per annum (from the 200 per annum in the currently adopted plan) is welcomed in order to ensure the Council are meeting their Objective Assessment of Housing Need.	The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and

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					<p>PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO476	Table 6.0.1	Object	<p>I do not believe that Wyre Forest District needs 300 more properties per annum. Also as there is a need for 540 elderly persons accommodation, I believe that a development like some of the developments in Birmingham which are more like village communities where there is a Doctors surgery on site would be more suitable on the Lea Castle Hospital site than 600 houses/flats.</p>	<p>There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO468	Table 6.0.1	Object	<p>Wyre Forest District has a virtually static population growth. Population of Wyre Forest has risen by around 1,200 since 2001, an increase of around 1.2%, and by about 100 persons since mid-2011. (http://www.worcestershire.gov.uk/info/20044/research_and_feedback/795/population_statistics/8)</p>	<p>The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036. There will be a marked increase in the number and proportion of older residents. The population aged 65+years is expected to increase by 28.1%</p>

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				I do not understand why the aim is to build 5,400 new properties over the life of the plan which is 300 per annum.	<p>from 24,200 in 2016 to 31,800 in 2036. (Data based on ONS 2016-based Subnational Population Projections).</p> <p>This suggests that the population is not 'static'. For further information please see the updated OAHN Study which will be published on the Council's website during the Pre-Submission consultation.</p> <p>There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>
	LPPO480	Table 6.0.2	Support	Agree with this table but feel that the proposed developments on Lea Castle Hospital site will impact detrimentally to Cookley village.	Support and comments noted.
Hardwick & Prosser	LPPO721	6.0.2 Settele ment	Comment	It is noted that the draft documentation's settlement hierarchy states that in the main town, Kidderminster, suitable development includes utilisation of	Comments noted.

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		hierachy		appropriate Greenfield and Brownfield sites and residential amongst other things. It is noted that the NPPF specifically excludes garden land from the definition of Brownfield and thus garden land is not considered previously undeveloped so is Greenfield.	
Kidderminster Harriers Football Club	LPPO931	Table 6.0.2	Comment	To promote sporting opportunities in the district and improved health in accordance with NPPF. Suggests including an additional bullet to suitable development column for Kidderminster: <ul style="list-style-type: none"> • <u>Sports and education facilities.</u> 	Comment and suggestion noted.
Sir Thomas White's Charity	LPPO907	Table 6.0.2	Support	Our client supports the settlement hierarchy described in Table 6.0.2 'Wyre Forest Settlement' Hierarchy of Policy 6B and the identification of Kidderminster as the 'Main Town' where development will primarily be directed. As Wyre Forest's largest settlement, Kidderminster is a sustainable location for growth and the recognition of this is supported.	Support is noted.
Hagley Parish Council	LPPO780	Policy 6B Locating New Development	Object	Housing locations The report undertaken By Peter Brett Associates for GBS LEP and others (for which WFDC was a client) concluded that Wyre Forest was not part of the Birmingham & Black Country Housing Market Area (HMA), which it identified. The Consultation Document correctly (in our view) identifies Wyre Forest District as coterminous with a HMA. Both these imply that WFDC should in its plan be making zero provision for housing	Objection noted. The Sustainability Appraisal Report and the Site Selection Process Topic Paper set out the site selection process that the Council has undertaken. The HELAA document also provides from evidence. These evidence base documents are available for viewing on the Council's website.

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				<p>for Birmingham commuters. Since such commuters (if by going by car) will inevitably use A456, this will prevent the new plan from exacerbating the traffic problems in Hagley described above.</p> <p>The Consultation Document concentrates housing sites on the east side of Kidderminster, without giving any (or at least any adequate) explanation for this. The implication that we draw from this is that Kidderminster is seeking to contribute to the alleged shortfall of housing land in Birmingham and (contrary to wider policy) increase commuting, which (if by car) will inevitably be along the congested section of A456, exacerbating the problems in Hagley and the pollution in the Hagley AQMA.</p> <p>The strategic gaps between Kidderminster and Bewdley and between Kidderminster and Stourport are narrow and should not be eroded, but the options of expanding Kidderminster northwest towards Low Habberley do not seem to have been considered. If the objective is to meet Kidderminster’s housing needs (rather than Birmingham’s), this option should have been considered. This area has good road links to Kidderminster town centre and scarps above Habberley Valley and a tributary of the Honey Brook would provide good landscape barriers to be a new edge to the Green Belt; that is if Green Belt release is</p>	

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				<p>necessary.</p> <p>As a Brownfield site, it is very difficult to oppose the redevelopment of Lea Castle Hospital. This site is very well shielded by coniferous plantations. The consultation suggests development between it and A451 Stourbridge Road. This may look attractive on the map, but in fact would be a severe encroachment on open countryside, and adversely affect the openness of the Green Belt.</p> <p>We note that the sites considered by WFDC include some among scattered housing in Broome parish. The housing in this area is properly to be considered as part of a scatter of housing focused on Hagley. We support the rejection of those sites. Housing in that area should not be considered unless the gap between Hagley and the Wyre Forest District boundary has been developed.</p> <p>We also note that two large employment sites have been suggested (and rejected) in the Hurcott and Hodgehill area on either side of A456, on the basis that they have a good transport link via A456. Their use, perhaps as a logistics site, would also exacerbate the traffic problems and pollution in West Hagley.</p>	
South Worcestershire	LPPO1245	Settlement hierarchy	Support	The SWCs support the proposed settlement hierarchy which is logical and informed by appropriate sustainable development planning criteria.	Support and comments noted.

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Authorities		y			
Victoria Carpets	LPPO1500	Settlement Hierarchy	Support	We support the settlement and the identification of Kidderminster as the 'Main Town' where development will primarily be directed. As Wyre Forest's largest settlement, Kidderminster is a sustainable location for growth and the recognition of this is supported.	Support is noted.
Stanmore Properties Ltd	LPPO1509	Table 6.0.2 - Settlement Hierarchy	Support	The category, role and list of suitable development for Kidderminster as set out in <i>Table 6.0.2 Wyre Forest Settlement Hierarchy</i> is supported.	Support and comments noted.
	LPPO4562	Settlement Hierarchy	Comment	Cookley is a Village <i>INSET</i> in Green Belt with its own strong identity/local services. WFDC should support Wolverley & Cookley PC to meet local needs in a sustainable way w/o destroying green belt and effectively joining Cookley to Kidderminster.	Comments noted.
	LPPO4563	Settlement Hierarchy	Comment	Cookley is a Village <i>INSET</i> in Green Belt with its own strong identity/local services. WFDC should support Wolverley & Cookley PC to meet local needs in a sustainable way w/o destroying green belt and effectively joining Cookley to Kidderminster.	Comments noted.
Sport England	LPPO209	Policy 6B - Locating New	Comment	The Council is nearing the completion of a Playing Pitch Strategy and any policy relating to new development should cross ref. to that document to ensure decisions regarding the release of existing playing field sites for	Comments noted.

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		Development		<p>alternative development or the provision of new playing field to support new development is properly informed and based on local evidence base to accord with NPPF Pars 73 and 74.</p> <p>A number of the proposed allocations do affect playing field sites therefore this is an important issue.</p>	
Horton Estates Ltd	LPPO849	Policy 6B	Support	<p>Bullet point iii. of Sub-section A is supported for the same reasons set out in our response to Table 3.0.2. In addition, the view is taken that bullet point v. should be expanded to refer to the Local Plan's identification of specific PDL sites within the Green Belt (under draft Policy 34) where sustainable development will be permitted.</p> <p>The settlement hierarchy in Table 6.0.2 should also reflect that development at PDL sites in the Green Belt – both specific sites and windfall sites – is permitted by draft Policy 34. As it stands, the hierarchy appears to be in conflict with draft Policy 34 and it is therefore requested that "PDL sites in the Green Belt" is provided as a specific category in the hierarchy. A similar position exists with Sub-sections D and E which fail to acknowledge the development permitted on PDL in the Green Belt (within the countryside) under draft Policy 34.</p>	Support and comments noted.
Barratt Homes West Midlands	LPPO769	Policy 6B	Comment	Support for aspirations of policy on locating new development but concerned that this is not reflected in	Comments noted.

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				<p>actual allocations.</p> <p>Number of proposed allocations are on employment sites - such site should only be allocated where there is clear market evidence to show sites will not come forward for employment uses.</p> <p>We support the recognition that it is necessary to facilitate the delivery of sufficient accessible housing to meet objectively assessed needs. We are concerned that the Kidderminster allocations in particular will result in a market saturation on the eastern edge of Kidderminster. Furthermore, housing should be distributed so that it reflects the settlement hierarchy.</p> <p>Accept that some Green Belt land release will be required. However, suitable and sustainable Greenfield sites outside Green Belt should be allocated first in order to pass 'exceptional circumstances' test.</p>	
Homes England	LPPO797	Policy 6B	Support	Policy states that the development strategy and site allocations proposed for locating new development are based on a number of principles. These include the re-use of available, accessible and environmentally acceptable Brownfield land. The HCA supports this, as the proposed allocation of the former Lea Castle Hospital site as a core housing site for 600 dwellings as part of a mixed use development is an appropriate use of the site, regenerating a redundant Brownfield site	Support and comments noted.

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				<p>on the edge of Kidderminster and bringing it back into use.</p> <p>Another principle is the maintenance and openness of the Green Belt following the Green Belt Review. This is an important principle, and highlights the need for the Council to carefully consider the scale of Green Belt releases that will be required in order to meet the OAN over the plan period.</p> <p>The principle that Kidderminster is to be the main focus for large-scale housing development is supported.</p>	
	LPPO4556	Settlement Hierarchy	Comment	Cookley is a Village <i>INSET</i> in Green Belt with its own strong identity/local services. WFDC should support Wolverley & Cookley PC to meet local needs in a sustainable way w/o destroying green belt and effectively joining Cookley to Kidderminster.	Comments noted.
	LPPO4574	Settlement Hierarchy	Comment	Cookley is a Village <i>INSET</i> in Green Belt with its own strong identity/local services. WFDC should support Wolverley & Cookley PC to meet local needs in a sustainable way w/o destroying green belt and effectively joining Cookley to Kidderminster.	Comments noted.
Horton Estates Ltd	LPPO851	Table 6.0.3 and 6.0.5	Comment	Table 6.0.3 appears to provide a breakdown of what the District Council deems to be completed or committed housing supply. However, it includes lapsed planning permissions which is unsound because they	Comments noted.

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				no longer benefit from planning permission and do not amount to deliverable/developable supply. It is requested that this component be deleted from Table 6.0.3. In addition, we wish to highlight that PDL could be released at Cursley Distribution Park through site rationalisation which could be allocated for residential development. As described in more detail above, two areas of land could potentially be released (1.5ha and 1.9ha), each of which could accommodate in the order of 40 dwellings.	
Sir Thomas White's Charity	LPPO913	Table 6.0.3	Comment	Table 6.0.3 within the Key Choice for the Development Strategy states that the Council have identified 3,640 dwellings (approximately) which could be achieved to meet the requirement. The complete figure from 2016/17 (the first year of the plan) are yet to be confirmed; however these are not going to plug the gap between the proposed allocations and the requirement. This leaves a significant shortfall which requires the Council to release additional strategic land. The plan includes no reference to a Part 2 Plan or a review mechanism. In this context the plan must identify additional strategic sites for housing now if it is to be found sound. Land to the north west of Kidderminster (a site location plan for which is enclosed) could contribute towards the Council's requirements for additional strategic land and could boost the supply of dwellings required within the	<p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>

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				<p>region, which would assist in addressing the shortfall.</p> <p>Beyond the issue of identifying insufficient land to meet its housing need, it should also include additional sites to provide flexibility with respect to the Council’s housing needs and consequently the allocation of sites. At present the Council’s supply relies on a significant amount of previously developed land, which is likely to have constraints in terms of contamination and accessibility. Furthermore, the Council has only ever achieved an annual supply in excess of 300 dwellings in two previous years (2013/2014 and 2014/2015), and predicted for 2016/2017 (although this is still to be confirmed). If the Council is to consistently exceed 300 dwellings going forwards, as well as allocating sufficient sites to meet the basic requirement (which it does not currently do), additional flexibility in the supply will assist further. Consequently the Council should include additional flexibility of at least 10% above the minimum requirement of 5,400 units when allocating sites which are appropriate for addressing the Council’s shortfall. This equates to 540 additional dwellings.</p>	
CORE11	LPPO239	6.0.3	Support	Support for table 6.0.3.	Support is noted.
CORE11	LPPO240	6.0.4	Comment	Option 4 strongly recommended, The development fabric will be of prime importance.	Comments noted.
	LPPO4598	6.0.4	Comment	We would say that the wording on the proposals is	Comments noted.

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				confusing. One would assume that the 'Core proposal' would be the favoured one, when in fact this is not the case. Such proposals should be made very clear and concise so that the general public are in no doubt about what is being proposed.	
Wyre Forest Green Party	LPPO1486	Brownfield Sites	Comment	According to the statistics on page 39 of the Local Plan Review, there is a total of 967 dwellings completed or with planning permission granted on Brownfield sites, with a further 1,193 proposed by the plan on other Brownfield sites. 350 dwellings are also proposed on Greenfield sites not in the Green Belt and 796 dwellings can be placed on previously built Green Belt land including 600 of these at Lea Castle. This makes a total of 3,306 dwellings. This exceeds the number of houses needed for the 15 year land supply (when using the SNPP figures of 199 p.a. as detailed in 1c above) without the need to use Green Belt at all.	Comments noted. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	LPPO483	Table 6.0.5	Object	Do not believe that we need to allow land for 6,000 properties therefore as I object to both Option A and Option B there is no need to use any percentage of greenbelt land.	Objection and comments noted. The proposed development requirement is based on the housing need for the District. This housing need was evidenced in the OAHN study published in April 2017. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will

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					use the Government’s new standardised methodology.
Education & Skills Funding Agency	LPPO1047	Table 6.0.5	Comment	Under Education Act 2011 and Academies Act 2010, all new state schools are now academies/free schools and ESFA is delivery body for many of these rather than local authorities. The planned housing target of 6000 homes will place some additional pressure on education facilities. The Local Plan must be 'positively prepared' to meet these requirements.	Comments noted. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
Education & Skills Funding Agency	LPPO1058	Table 6.0.5	Comment	In terms of the two development options (Table 6.0.5: Key Data, page 39) presented, the ESFA does not favour one option over the other, however, we are keen to ensure that regardless of the split between non green belt and green belt land there is sufficient land safeguarded for new schools to meet the need generated by the proposed allocations.	Comments noted.
	LPPO5108	Table 6.0.5	Object	Whilst it is difficult to reconcile the data in Table 6.0.5 with the allocations outlined in Policy 30 and Policy 31, Table 6.0.5 indicates that 2956 new dwellings can be built on Brownfield sites and on the Lea Castle site without releasing more land from the Green Belt. On that basis, and using the figures from the same table, the balance of 626 dwellings can be built under Option B “additional dwellings on Greenfield sites not in Green Belt” category or, in the worst case, by allocating a	Objection and comments noted. The proposed development requirement is based on the housing need for the District. This housing need was evidenced in the OAHN study published in April 2017. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating

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				<p>small part of the “number of dwellings proposed on Greenfield Green Belt sites” category. There is clearly neither a requirement to develop the Green Belt Fields abutting the Spennells Estate, for which an allocation of 930 dwellings, under site references OC/13S. WFR/ST/2 and AS/10 has been proposed. nor a requirement to develop the core area in Option A to the East of Kidderminster.</p>	<p>housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<p>LPPO4499</p>	<p>Table 6.06</p>	<p>Object</p>	<p>This table is unfairly portrayed. All facts concerning option A are portrayed in a positive manner whereas facts concerning option B are negative. For example, Option A is shown to enable ‘the building of Kidderminster Eastern Relief Road’ whereas Option B ‘Would not enable building of Kidderminster Eastern Relief Road and the benefits this scheme allows’. It is obvious this table has been designed to advocate option A and confuse the less-educated population. I believe this is a key reason why this proposal should be completely reconsidered and presented in a fair manner.</p>	<p>Objection and comments noted.</p>
<p>Bromsgrove & Redditch DC</p>	<p>LPPO901</p>	<p>Table 6.0.6 Infrastructure Roads</p>	<p>Object</p>	<p>Council has concerns re transport evidence required to support these allocations. Concerned that preference is being sought for a preferred option without any modelling being done and a transport background paper being available. Table 6.0.6 sets out infrastructure requirements for both core sites and options A and B, together with a comparison of impacts on the highways network. It is not clear what</p>	<p>Objection and comments noted. The Transport evidence base study will be made available at the Pre-Submission consultation stage. WFDC will continue to engage with Bromsgrove and Redditch Council’s in Duty to Co-operate discussions.</p>

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				<p>these schemes entail, when and how they will be delivered and what impact they will have. Option A appears to offer an eastern relief road which could ease congestion and improve air quality within Kidderminster town centre. But there is no mention of what impact this might have outside of Wyre Forest. Either option would be likely to have a significant impact on Bromsgrove's infrastructure. We are especially concerned about the impact on the A456 through Hagley and beyond. Also the A448 route to Bromsgrove and Redditch. Both routes would be used to access the motorway. There are already AQMAs at these locations. What impact would there be on country lanes which may be used as rat runs?</p> <p>The Council hoped that transport evidence would have been made available to influence the Preferred Option and not at a later stage in order to justify the chosen option going forward. This issue has already been raised in response to IDP. We would like to engage further with WFDC and WCC to develop a wider transport strategy for North Worcestershire. This would then allow the area to continue to grow and thrive in a coordinated and sustainable way.</p>	
Worcestershire County Council, Planning	LPPO1138	Table 6.0.6	Comment	In Table 6.0.6 the housing row states that "Large scale site releases more likely to enable viable provision of affordable housing". However, there is considerably evidence to the contrary, both in Worcestershire and	Comments noted. We welcome the opportunity to work with Worcestershire County Council and the Green Infrastructure Partnership as the plan evolves.

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Economy & Performance				<p>nationally. The accompanying variability assessment indicates that small scale green field developments of between 30 and 75 homes are the most viable.</p> <p>This may be too broad a statement, as the viability of affordable housing will depend on a range of factors, not least of which is location, as well as the scale of the development. Pockets of growth consisting of small-scale development will support existing infrastructure, but large-scale development will have a wider and more far-reaching impact on, for example, school places.</p> <p>Infrastructure and roads: this line of the table appears to present the Kidderminster Eastern Relief Road as desirable in its own right which is contrary to discussions. The potential need for the relief road arises from the planned development to the east of Kidderminster. As the quantum of development is greater in option A it is the working assumption that this will be more supportive of the need for the road than option B, but we would also stress that no transport modelling has as yet taken place as we will undertake this once a development option has been chosen. Modelling will confirm (or not) the need for the road.</p> <p>The results of the modelling notwithstanding, there are also concerns over the route of the relief road and the</p>	

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				<p>potential impact that this would have on protected sites in the district, including both SSSI's and Local Wildlife Sites in particular direct and indirect (notably severance) effects on Hurcott & Podmore Pools SSSI and Local Wildlife Sites, Captain's & Stanklyn Pools and Spennels Valley Local Wildlife Sites and Hoo & Barnett Brook Local Wildlife Sites. A complex of designated sites of nature conservation significance form biodiverse corridors which radiate into the open countryside from the peri-urban eastern fringes of Kidderminster. The Eastern Relief Road must address these effects in a manner which demonstrates net-gain for biodiversity; the quanta of mitigation will become a significant burden on the surrounding allocations. This is likely to far outweigh any opportunities for de-fragmentation/habitat creation or restoration which this new linear infrastructure might pose.</p> <p>We would welcome further opportunity to discuss these issues with WFDC following completion of the transport modelling and its conclusions.</p> <p>In the same table, the row for 'Green Infrastructure and Biodiversity' states that "The more dispersed nature of this approach will mean that more sites are affected. This, in combination with their typically smaller size (with the exception of the enlarged Lea Castle) will mean the delivery of Green Infrastructure</p>	

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				<p>requirements is more difficult".</p> <p>We have some concerns about these comments about green infrastructure, and have impacts both locally and in combination on corridors. The Worcestershire Green Infrastructure partnership undertook an assessment of the site proposals at a high level, including some mitigation options in early 2017, and we would refer back to this document in assessing the green infrastructure impact of options A and B. We welcome the opportunity to work further with WFDC on green infrastructure.</p>	
	LPPO484	Table 6.0.6	Comment	I do not believe we need Option A or Option B.	Comment noted.
CORE11	LPPO241	6.0.6	Comment	Option B is the overall better choice, with more attention to green infrastructure, less large housing areas, a better place to live and quality of life, these factors should not be sacrificed to saving of cost if more dense developments are decided upon.	Commented noted.
Summerfield Against Land Transformation	LPPO1611	Table 6.06	Object	There is <u>clear bias</u> contained within the draft Local Plan, to the extent that Option A is portrayed as the only real choice and Option B as, effectively, ballast and barely viable. This is further depicted in the "vision" (simply a point of view) and as "strategic" (a high-level choice which supports <i>your</i> point of view). This is unacceptable.	Objection and comments noted.

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				<p>There is further bias in relation to the Eastern Relief Road. The dominant argument for Option A appears to revolve around both ‘critical mass’ and thus the need for a relief road, together with its capacity to provide solutions to existing congestion, poor air quality and problematic transportation links. Indeed, so heavily do you rely upon the relief road that it becomes the justification for rather than a consequence of Option A.</p> <p>Option A is shaped to justify the relief road, resolve pre-existing transport problems and attract capital funding.</p>	
Historic England	LPPO1269	Table 6.0.6	Comment	With reference to tables beginning on page 41, our specific interest is in how the harm/ impact to the historic environment has been assessed, in the decision of which option is the most appropriate for the Local Authority. This includes whether to release land from the Green Belt and also for all of the proposed site allocations contained later in the document.	The Historic Environment evidence base study includes details of the analysis of the proposed site allocations and land to be released from the Green Belt. This study will be made available on the Council's website during the pre-submission consultation.
Wyre Forest Friends of the Earth	LPPO1313	6.0.6 Road Infrastructure	Comment	The construction of the Eastern Bypass could encourage more car journeys to be undertaken. Locally generated traffic on the eastern side of Kidderminster could use the bypass as a shortcut between areas. This could lead to increased pollution including emission of CCGs, more road casualties, a reduction in walking and	Comments noted.

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				cycling and a consequent rise in obesity and associated health conditions.	
Barratt Homes West Midlands	LPPO768	Table 6.0.6	Object	Option B requires less Green Belt release but still meets the housing requirement. Do not consider that exceptional circumstances have been demonstrated to justify this Green Belt release during site selection process.	Objection and comments noted.
	LPPO4695	Table 6.0.3	Object	<p>Inconsistencies in Local Plan document</p> <p>A further reason for objecting the proposals for sites allocated for housing relates to the inconsistencies / lack of clarity over the housing number projections reported in the Local Plan document.</p> <p>Table 6.0.3 in the Local Plan reports that 3,640 houses can be accommodated on “core or common to both potential approaches [options]”. This replicated in Table 3. The Local Plan then concludes that they will assume a provisional requirement of 6,000 dwellings, which results in a shortfall of 2,360 houses. However, assuming 6,000 houses is a further 11% uplift which is in addition to the 58% uplift that has applied to the base population projections. The total uplift from the base population projections is therefore 75% (2,580, 143 per annum). This uplift has again not been justified by WFDC or Amion Consulting.</p> <p>In addition, it would be sensible to assume that the</p>	<p>Comments noted. The proposed development requirement is based on the housing need for the District. This housing need was evidenced in the OAHN study published in April 2017.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>total core housing numbers identified in proceeding sections under headings for each area (e.g. Kidderminster Urban Extension) would equate to the 3,640 houses outlined in Table 6.0.3. However, Table 4 shows the full list of “core” housing sites, which totals 4,486 houses and 40.94 hectares of employment land. Once again, this demonstrates the lack of clarity over the source of housing numbers and reinforces the fact that the Local Plan and supporting OAHN are not suitable for public consultation.</p> <p>Table 3 Core / “common” housing numbers (adapted from Table 6.0.3)</p> <table data-bbox="792 842 1473 1276"> <thead> <tr> <th data-bbox="792 842 1400 874">Type of site</th> <th data-bbox="1400 842 1473 874">No. o</th> </tr> </thead> <tbody> <tr> <td data-bbox="792 874 1400 946">Dwellings completed from 1 April 2016 (as of April 2017)</td> <td data-bbox="1400 874 1473 946">225</td> </tr> <tr> <td data-bbox="792 946 1400 978">Existing and lapsed planning permissions</td> <td data-bbox="1400 946 1473 978">712</td> </tr> <tr> <td data-bbox="792 978 1400 1010">Previously developed land (not in Green Belt)</td> <td data-bbox="1400 978 1473 1010">1,193</td> </tr> <tr> <td data-bbox="792 1010 1400 1090">Previously developed land in Green Belt (including 796 Lea Castle)</td> <td data-bbox="1400 1010 1473 1090">796</td> </tr> <tr> <td data-bbox="792 1090 1400 1121">Sub-total</td> <td data-bbox="1400 1090 1473 1121">2,956</td> </tr> <tr> <td data-bbox="792 1161 1400 1225">Potential from suitable Greenfield and small scale Green Belt release (primarily for local need)</td> <td data-bbox="1400 1161 1473 1225">684</td> </tr> <tr> <td data-bbox="792 1225 1400 1257">Total</td> <td data-bbox="1400 1225 1473 1257">3,640</td> </tr> </tbody> </table>	Type of site	No. o	Dwellings completed from 1 April 2016 (as of April 2017)	225	Existing and lapsed planning permissions	712	Previously developed land (not in Green Belt)	1,193	Previously developed land in Green Belt (including 796 Lea Castle)	796	Sub-total	2,956	Potential from suitable Greenfield and small scale Green Belt release (primarily for local need)	684	Total	3,640	
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LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY (excluding paragraphs 6.54-6.57)

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			Urban	WFR/WC/15	600	1.89		Y	
			Extension Urban	BW/4	200	0		N	
			Extension Urban	WFR/CB/7,	1735	9.66		Y	
			Extension	OC/4/5/6/12/13N, WFR/ST/1,FPH/27					
			Stourport	LI/2	80	0		Y	
			Stourport	LI/6/7	94	0		Y	
			Stourport	AKR/1	17	0		N	
			Stourport	AKR/2	72	0.34		N	
			Stourport	AKR/7	20	0		N	
			Stourport	AKR/20	170	0		N	
			Stourport	MI/1	40	0		N	
			Stourport	MI/34	114	0		N	
			Stourport	MI/5	55	0		N	
			Stourport	MI/6	106	0		N	
			Stourport	MI/33	0	0.34		N	
			Bewdley	WA/BE/1	100	0		Y	
			Bewdley	WA/BE/5	45	0		Y	
			Bewdley	BR/BE/6	30	0		N	
			Villages	WA/UA/4	10	0		Y	
			Villages	BR/RO/1	30	0		N	
			Villages	BR/RO/4/6	20	0		N	

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				<table border="0"> <tr> <td>Villages</td> <td>BR/RO/7</td> <td>20</td> <td>0</td> <td>N</td> </tr> <tr> <td>Villages</td> <td>BR/RO/21</td> <td>0</td> <td>1.32</td> <td>N</td> </tr> <tr> <td>Villages</td> <td>BR/RO/26</td> <td>5</td> <td>0</td> <td>N</td> </tr> <tr> <td>Total</td> <td></td> <td>4,486</td> <td>40.94</td> <td>-</td> </tr> <tr> <td>Total (in Green Belt)</td> <td></td> <td>2,724</td> <td>11.62</td> <td>-</td> </tr> <tr> <td>Total (not in Green Belt)</td> <td></td> <td>1,762</td> <td>29.32</td> <td>-</td> </tr> </table> <p>Further to this, it is not clear how Table 6.0.3 (replicated in Table 3 above) in the Local Plan relates to Table 6.0.5 (replicated in Table 5, overleaf) or how the numbers relate to Option A and B. WFDC need to clarify how these numbers relate to the core/common sites and the information presented in Table 6.0.3 of the Local Plan. For instance, the 1,193 additional dwellings to be placed on Brownfield land which are additional proposed by the plan, where are these in relation to Table 6.0.3? Even if the mathematics behind the numbers is correct (which is doubtful), the presentation of the information is illogical and uninformative.</p> <p>Table 5 Core / “common” housing numbers (adapted from Table 6.0.5)</p> <table border="0"> <tr> <td>Number of dwellings required 2016 - 2034</td> <td>6,000</td> </tr> <tr> <td>Number of dwellings to be placed on brownfield land</td> <td>967 (a perm propd</td> </tr> <tr> <td>Number of dwellings on previously development</td> <td>796</td> </tr> </table>	Villages	BR/RO/7	20	0	N	Villages	BR/RO/21	0	1.32	N	Villages	BR/RO/26	5	0	N	Total		4,486	40.94	-	Total (in Green Belt)		2,724	11.62	-	Total (not in Green Belt)		1,762	29.32	-	Number of dwellings required 2016 - 2034	6,000	Number of dwellings to be placed on brownfield land	967 (a perm propd	Number of dwellings on previously development	796	
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				<p>land in the Green Belt (included 600 at Lea Castle) Number of dwellings proposed on greenfield sites 350 not in Green Belt Number of dwellings proposed on greenfield 1,918 Green Belt sites Sub-total 5,224 Option A – Additional Green Belt dwellings 1,080 Option B – Additional Green Belt dwellings 765 Option B – Additional dwellings on Greenfields 570 sites not in Green Belt Total Option A = 6,304 Option B = 6,559</p> <p>Further concerns relating to the mathematics informing the Local Plan are strengthened by the inability of WFDC to calculate percentages. Table 6.0.6 of the Local Plan states that Option A would take 266 gross hectares of Green Belt land, which is the equivalent of 2.4% of the overall Green Belt land area. Option B is reported to take 218 gross hectares of Green Belt land area, equating to 1.9% of the overall Green Belt land area. Assuming that the document refers to the same “overall Green Belt area”, 218 hectares (Option A) cannot equal 1.9% at the same time as 266 hectares equals 2.4%. Table 6 demonstrates the correct scenarios for if Option A and Option B scenarios were considered as correct. The result show that there is between a 7-hectare reduction and 9-hectare increase</p>	

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				<p>between the two scenarios, which whilst this is a small proportion of the projected land take for each option, it is incorrect and demonstrates that a comprehensive technical review of the Local Plan has not been completed.</p> <p>Table 5 Core / “common” housing numbers (adapted from Table 6.0.5)</p> <table border="0" data-bbox="792 660 1473 1165"> <thead> <tr> <th data-bbox="792 660 1227 687">Scenario</th> <th data-bbox="1227 660 1473 687">Option</th> </tr> </thead> <tbody> <tr> <td data-bbox="792 687 1227 730">Local Plan assessment</td> <td data-bbox="1227 687 1473 730">Option A</td> </tr> <tr> <td data-bbox="792 730 1227 948">Assume Option A is correct</td> <td data-bbox="1227 730 1473 948">Option B Option A (as per Local Plan) Option B</td> </tr> <tr> <td data-bbox="792 948 1227 1054">Assume Option B is correct</td> <td data-bbox="1227 948 1473 1054">recalculated Option A</td> </tr> <tr> <td></td> <td data-bbox="1227 1054 1473 1165">recalculated Option B (as per Local Plan)</td> </tr> </tbody> </table> <p>5. Status of the Housing White Paper (February 2017)</p> <p>The Local Plan states that:</p> <p><i>“at the time of preparation of this preferred option</i></p>	Scenario	Option	Local Plan assessment	Option A	Assume Option A is correct	Option B Option A (as per Local Plan) Option B	Assume Option B is correct	recalculated Option A		recalculated Option B (as per Local Plan)	
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				<p><i>document the Government’s new Housing White paper was being published along with the underpinning documentation that accompanied it. The Council’s intention has been to try to anticipate as much as is possible of the Government’s strategy so that a Plan consistent with the requirements of the NPPF and emerging national policy has been brought forward for consultation. As such, through this Preferred Options, Wyre Forecast District Council has strived to propose a realistic level of housing requirement that respects the findings of the Local Plans Expert Group”</i></p> <p>The Housing White Paper states that:</p> <p><i>“we need to plan for the right homes in the right places... but at the moment, some local authorities can duck potentially difficult decisions, because they are free to come up with their own methodology for calculating objectively assessed need. So, we are going to consult on a new standard methodology for calculating objectively assessed need and encourage councils to plan on this basis”.</i></p> <p>The Paper also states:</p> <p><i>“Plan-making remains slow... with arguments about the number of homes to be planned for often being a particular cause of delay – something not helped by the lack of a standard methodology for assessing housing</i></p>	

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				<p><i>requirements. We want to ensure that every are has an effective, up-to-date plan, by making it easier for plans to be produced and understood and simpler to identify the homes that are required”.</i></p> <p>In relation to timescales for the methodology, the document states:</p> <p><i>“we will publish this consultation at the earliest opportunity this year [2017], with the outcome reflected in changes to the National Planning Policy Framework”.</i></p> <p>Given the timescales in which the Local Plan is being developed and the lack of transparency /robustness in relation to the OAHN report, it would be sensible for WFDC to await the objective methodology. This way WFDC could ensure they have used a methodology that justifies the substantial uplift from baseline population growth is actually realistic and the Local Plan will not pose risk to large expanses of Green Belt land unnecessarily.</p>	
	LPPO4809	Option B Stourport	Comment	A statement is made in the Preferred Options Document (table 6.0.6 option B) states that additional development to the west of the river at Areley Kings is likely to have a negative impact on Stourport and the river crossing. The development proposed is only about 20% of the existing Areley Kings settlement	Comments noted. A Stourport relief road is not being proposed; nor is a new bridge over the River Severn. Both of these would be very expensive and is not supported by the Worcestershire Local Transport Plan No. 4.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY (excluding paragraphs 6.54-6.57)

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				(compared to 100% for Spennells) and the document fails to mention that the WFDC Infrastructure Delivery Plan (2012) proposes the Stourport relief road, with a new bridge over the River Severn.	
	LPPO4619	Development Strategy	Object	Overall, the proposals reflect a lack of awareness of the need for infrastructure to support new housing developments, and a lack of creativity in considering how best to utilise available land.	Objection noted.
Yew Tree Walk Ltd	LPPO818	Location of new development	Comment	Stourport-on-Severn is identified as a large market town, the second largest settlement in the District. With Kidderminster as the main town in the District, both settlements should therefore be the primary focus for future housing development. In this context, rather than an either-or choice between 'Option A' and 'Option B', the housing distribution options being suggested through the Preferred Options, it would be more appropriate to seek to concentrate growth through major urban extensions at Kidderminster but also to seek some dispersed growth particularly focussing on Stourport-on-Severn given its role to support Kidderminster in the provision of larger scale housing. There is scope to increase the numbers allocated at Stourport-on-Severn, reducing the reliance of smaller, less sustainable and particularly rural settlements, in delivering the housing requirement. On this basis, further sustainably located sites on the edge of Stourport-on-Severn, should be identified which should include additional Green Belt	Comments noted.

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				release.	
Barratt Homes West Midlands	LPPO767	Chapter 6	Object	Development should be allocated based on sustainability and suitability of sites. Kidderminster has a disproportionate amount of dwellings allocated under Option A. Stourport has 20% of population but under 14% of allocations under Option A. This should be higher.	Objection and comments noted.
Barratt Homes West Midlands	LPPO766	para. 6.48	Object	Emerging Plan places great emphasis on Brownfield urban sites (most are existing allocations) and potential large urban extensions (tend to have long lead-in times). Urban extension will need planning applications submitting shortly after adoption of Plan and have very strong delivery rates. We propose that a buffer should be added to OAHN to ensure choice and competition.	Objection and comments noted.
Barratt Homes West Midlands	LPPO772	Table 6.0.6	Object	Both options result in Green Belt release but no reference made to NPPF guidance and exceptional circumstances test. If there is a suitable and sustainable strategy for development that would protect the Green Belt then exceptional circumstances test cannot be passed. Where is this evidence to support Green Belt release? The 2 options have limited relationship to the status of the principal settlements. Under Option A, 85% of development goes to Kidderminster, 13.8% to Stourport and 3.1% to Bewdley. Kidderminster has 56% of population and Stourport 20%. Agree that Kidderminster should be focus for growth but other settlements should be	Comments noted. Further evidence base work has been undertaken at pre-submission stage which will address some of these issues raised.

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				<p>allocated growth proportionate to their size. Stourport has advantage of only partly being in the Green Belt unlike Kidderminster.</p> <p>Table 6.06:</p> <p>Spatial Strategy - option A relies on significant amount of Green Belt development to east of Kidderminster. Option B also includes Green Belt allocation east of Lea Castle Hospital. These sites are all in same area and would compete against each other leading to likely market saturation. Where is evidence that this quantum of development is deliverable in Plan period? Additional allocations elsewhere such as Stourport would provide greater choice.</p> <p>Green Belt - no reference to exceptional circumstances test made - fundamental failing</p> <p>Housing - suggested that Option B will result in smaller sites that will be less viable and therefore provide less affordable housing. However, all sites are above threshold and should deliver affordable housing. Several Option A sites have significant infrastructure requirements which could affect viability of affordable housing provision. No evidence to support statements made in table.</p> <p>Employment - Option B results in an employment site</p>	

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				<p>being reallocated for housing. Option B housing numbers are higher than Option A so remove this site. it is suggested that Option B would mean reduced accessibility to employment sites due to more dispersed pattern of development. We do not agree. All employment allocations under Option B come from core sites.</p> <p>Roads - all allocations should be able to provide sufficient infrastructure to offset their impact.</p> <p>Education - implications for education provision between the 2 options should be minimal. Little evidence that option B will be more problematic for education provision.</p> <p>Green Infrastructure and Biodiversity - suggestion that option B would make green infrastructure harder to deliver. Where is evidence? Smallest allocation under Option B in main settlement is 72 units. Should be capable of providing GI.</p> <p>Sustainability - considerations identified in table are inappropriate. Little evidence to support statements made. Is not fair to describe option B as dispersed strategy as most development will be delivered in most sustainable settlement. It is suggested in Option B that considerable additional pressure will be placed on services and transport and cannot be mitigated. Where</p>	

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				<p>is evidence?</p> <p>Evidence in Preferred Options is insufficient to inform 3rd approach in issues and options document.</p>	
	LPPO2416	Section 6	Object	<p>There is reference in Section 6 to additional school places that would be required as a consequence of increased housing. I would expect that: any increase in FTE pupils would be accompanied by appropriate increases in school facilities eg hall, space, play space, dining facilities, toilets, as well as additional classrooms; no school should be increased by a fraction of a class unless this rounds an existing fraction up to a whole number. The plan should also reflect the lack of certainty of securing any new school provision via the Free School route, and provide funded alternatives.</p>	<p>Comments noted. WFDC will continue to work with WCC children’s services to establish future need for school places through the plan development lifetime.</p>
	LPPO2191	Development Strategy	Comment	<p>There should be a wider spectrum of development to meet housing needs for all sectors and demographics.</p> <p>Brownfield sites are not always suitable for sustainable communities in the long term. Town centre sites often lack amenity.</p> <p>I concur with the findings of the consultation that there has been a lack of development in Bewdley to</p>	<p>Comments noted. The emerging Local Plan is proposing to allocate some housing sites in Bewdley.</p>

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				<p>meet local requirements.</p> <ul style="list-style-type: none"> • Bewdley needs to support people who have been brought up in the locality and wish to remain. • There is a need to attract additional residents to support and contribute towards the local WFDC economy. The provision of suitable family housing to attract such residents needs to be increased and diversified. • There is also the question of elderly residents who wish to remain in Bewdley. Provision of suitable units for over 55s and possibly a complex for residential and nursing home is also a consideration. 	
	LPPO4597	Employment Needs	Comment	Industrial units continue to be built, why is this necessary, when throughout the District you can see units that have been empty for a considerable time, Easter Park is an example.	The Local Plan Review process doesn't just allocate sites for housing; it also allocates potential sites for employment to meet its employment land requirement. The Employment Land Review evidence base study sets out what the employment requirement is for the district during the plan period. This evidence base study is used to inform the site allocations in the emerging Local Plan for employment use.
	LPPO3966	Development	Comment	I will not labour the many valid points made about the loss of natural habitat implicit on any building on green	Comments noted.

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		Strategy		<p>belt or the inevitability of develops building the largest, most profitable houses they can which will inevitably attract commuters and lead to increased congestion, pollution and increased demand on local services which have so commendably been made by other contributors</p> <p>But crucially the document simple ignores the opportunity of empty buildings in the town centre. Believes that Council officials admit that recent large-scale retail developments have sucked economic activity out of the town centre leading to huge under occupancy but a blind eye has been turned by the council to these buildings due to the difficulty in getting landlords to repurpose these buildings into small residential units. Yet it must be obvious to all in authority that the centre of town is exactly where young people and mature people wish to relocate to be close to amenities. So, a council who would use their statutory powers including compulsory purchase orders has a ready stock of housing which could be ready for market in a maximum of 18 months. Further these homes would be close to public transport hubs, new health centre, hospital. The former glades site could easily have a school built on it, next to council operated pay car park rather than a cinema complex that will pull in car parking using customers for much smaller periods.</p>	

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				<p>As for plans to entice economic activity to the area, it is clear on only a cursory glance than no one who was asked to formulate these plans has the slightest idea about how businesses run, the keys are readily available local skilled workforce, good transport links and or local supply chain. Sadly, in the foreseeable future Kidderminster and environs will not be able to supply these which is why it is haemorrhaging industrial jobs.</p> <p>Too conclude once again this plan like the plan for a new council house, leisure centre and car park and road network, repaved public realm, retail developments, town gateways is ill thought out ill-conceived and totally misses the targets it aims to hit, attract younger people, allow older people who have spending power to downsize and stay in the area. Building executive houses for commuters and depriving the existing community of one its major areas to take exercise, breathe clean unpolluted air and de-stress from the pressures of modern life can only be described as a folly.</p>	
	LPP01597	Development Strategy	Comment	We accept the need for new housing development within Wyre Forest District, but have major concerns regarding the amount of development proposed concentrated to eastern Kidderminster, including the use of prime agricultural Category 2 and 3 land. It is averred this would not be sustainable development.	Comments noted. The Sustainability Appraisal Report and the Site Selection Process Topic Paper set out the site selection process that the Council has undertaken. The HELAA document also provides from evidence. These evidence base documents are available for

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				<p>We also believe that the WFDC Local Plan could better support the community through intelligent and sustainable regeneration of key areas of Kidderminster, Stourport and Bewdley. As shown in this Objection, it is not considered sufficient investigation has been made of Brownfield sites throughout the District. If the modifications to the Local Plan proposed were spread more evenly around the District, it would minimise the adverse impact on Green Belt, areas of SSI and reduce the urban sprawl of eastern Kidderminster.</p>	viewing on the Council’s website.
Taylor Wimpey West Midlands	LPPO1483	6 A Sustainable Future - Development Strategy	Comment	<p>Development Strategy - Buffer</p> <p>The Preferred Options identifies land to accommodate 6,000 dwellings to deliver the housing requirement of 5,400 homes, a 7.4% buffer. Recent advice of the Local Plan Expert Group suggested a buffer of 20%, therefore need to identify additional land equivalent to accommodating 1,080 additional dwellings. Therefore, in total, the Local Plan should be providing enough land equivalent to the delivery of a total of 6,480 dwellings over the plan period in Wyre Forest District.</p>	<p>Comments noted. The proposed development requirement is based on the housing need for the District. This housing need was evidenced in the OAHN study published in April 2017.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	LPPO1942	Development	Comment	If all these new houses are built where will the occupants work? Is it not more sensible to plough	There is a legal requirement for the Council to provide for its employment need as well as its

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		Strategy		money into promoting growth of new industry, then build housing at the same time as industry grows? Quality of life is important to attract business and workers to the area so the beauty of the Green Belt and the wildlife it supports is crucial to our town.	housing need. To make a place sustainable it needs employment as well as housing. By creating employment opportunities it enables people to live and work within the district. Please see the Employment Land Review for further details.
Stanmore Properties Ltd	LPPO1510	Section 6	Comment	A focus on Kidderminster accords with the summary of Issues and Options representations which states support for a sustainable urban extension to the north of Kidderminster based on the Lea Castle Hospital (Option 2) and the Hurcott Lane ADR. Concern in respect of traffic may be addressed by the recent completion of the Hoobrook Road link and impact on the Hurcott pastures SSSI is considered further in our other responses. Representations also indicated little enthusiasm for allocating development in the rural east or west of the District (Options 6 and 7) and in respect of the west the relative isolation and poor sustainability make the location difficult for development over and above that to meet local needs.	Comments noted.
South Worcestershire Authorities	LPPO1242	Development Strategy	Comment	The consultation paper sets out a level of growth that the level of housing growth proposed <i>'reflects the necessary housing requirement to satisfy housing need plus additional need arising from the necessity to provide additional affordable housing and opportunities for economic growth'</i> . However, it is not clear how the additional growth addresses unmet need	Comments noted. We continue to have Duty to Cooperate discussions with our neighbouring Local Authorities, which has included discussions with the Black Country Local Authorities, South Staffs, and Birmingham City Council.

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				<p>arising from outside of Wyre Forest District. It should also be recognised that whilst work is still underway to establish how the Birmingham shortfall will be distributed, there could be a need for the Wyre Forest Local Plan Review to consider higher levels of growth to absorb some of this need.</p>	
Historic England	LPPO1266	Development Strategy	Comment	<p>Within the section on development strategy, where development is discussed within the different settlements we would recommend that some text is included to highlight what the specific issues and opportunities are for the historic environment.</p>	Comments noted.
	LPPO5121	Development Strategy	Comment	<p>My issues with the plan are:</p> <ul style="list-style-type: none"> • The proposals for 5000+ houses (12,000+) by 2031 extra people are extreme. This is a 12%+ increase in the WF population (and if most are in Kidderminster; a 20%+ increase in Kidderminster's. • The location of the bulk of the development is on the eastern edge of Kidderminster, in a ribbon development. This will have the effect of taking Kidderminster closer to the West Midlands, and the creation of a huge and unpleasant urban sprawl. • The majority of the new population will be commuters. In effect WF will become another overspill area for Birmingham. There are no estimates of what type of people will choose 	<p>Comments noted. There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>

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				<p>to live here. What if they are all old and retired? The existing ageing population of WF will be worsened.</p> <ul style="list-style-type: none"> • It is not made clear in the plan what benefit this will bring WF economically. Maybe some extra money in retail shops? Attract new businesses? No real case is made for this in the plan. However the South Kidderminster Enterprise Park continued development is welcomed. • Development of this magnitude will also bring huge pressure to local services, the environment, and transport – as it is not clear in the plan about what extra provisions are being made (i.e. schools, doctors, bus services etc.). It will not make WF a nice place to live, it will be the opposite. • It is not clear how some areas have been declared ‘Core’ and some as options (A and B). There should be more options at this stage, and less ‘Core’. Lea Castle Hospital is an exception, but BW/4, OC/4,OC/5,OC/6 are all deemed core for no obvious or strong reason. <p>What can be done to minimise harm to the WF?</p> <p>Accepting that government and NPPF pressures have to be implemented, then to reduce the huge impact,</p>	

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				<p>the plans should consider;</p> <ul style="list-style-type: none"> ○ A clear plan for resolving the chaos on Hurcott Lane must be implemented before any work begins. It is a narrow country lane that cannot cope with today’s traffic, never mind the goods and service vehicles that will come. ○ An eastern bypass road should be in place to ease the potentially huge impact on traffic in and around Kidderminster’s already creaking road system. If public money is needed then a case must be made back to the NPPF (it is their demands that will create the emerging issues that will come). ○ ALL Brownfield sites <u>must be completed</u> before any Green Belt land is used. ○ Any development must have a critical mass of houses to create a focussed community. Much needed shops, bus routes, schools and healthcare provision will only work in a concentrated development – not one thinly spread over 10 miles. ○ Western Kidderminster (Low Habberley and Ferndale area in particular) has to be given much more 	

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				<p>consideration than has been already – and help keep WF separate from the West Midlands. Joining Stourport, Bewdley and Kidderminster is more attractive than WF joining with Stourbridge.</p> <ul style="list-style-type: none"> ○ Hurcott Pools and Pasture SSSI’s must be protected and respected much more! 	
	LPPO4405	Development Strategy	Comment	<p>During the consultation period we are asked to study and comment on the merits of two options: -</p> <p>Option A. A large-scale development mainly on ‘Green Belt’ fields adjacent to the east of Kidderminster and to the rear of Offmore together with associated infrastructure changes.</p> <p>Option B Development being accommodated by dispersal across the district.</p> <p>Nick Boles, following the outcry of the Tory Party being accused of failing to protect the countryside, categorically stated that development on Green Belt land will only be allowed when Local Authorities can prove insufficient Brownfield sites are available. Also in a letter to Anna Soubry MP, then Health Minister, who opposed Green Belt development ‘it may mean building on environmentally uninteresting’ green</p>	<p>Comments noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				<p>spaces’. This is in line with the with the 2012 Government National Planning Policy Framework which requires relevant planning authorities to ‘take into account the economic & other benefits of the best & most versatile land’.</p> <p>Nick Boles as Planning Minister also in the last Government set out plans to make it easier for high street shops to be converted into residential housing.</p> <p>Michael Gove MP on his appointment as Environmental Secretary spoke of the importance of protecting productive Greenbelt land which will be so important when we leave the Common Agricultural Policy</p> <p>The plan is biased to Option A which provides far more detail than Option B. Also evidenced by the fact no ‘drop-in’ session was originally organized for the Spennells. You have to ask the question why? Blakedown (served by a railway station with opportunities for parking extension) has not been considered. We are told ‘Developers had not submitted any proposals’ This indicates certainly in respect of Option A, the draft plan has been led by housing developers.</p> <p>Large urban estates attract increased anti social behaviour & crime rates & should be avoided.</p>	

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				<p>Worcester NHS is in crises, £29m in debt, having to reduce its services & also extend waiting times. It seems B’ham & Solihull (by providing funding) are keen to relocate their population who are expensive for the local authority to provide for in terms of schools, GP surgeries, hospitals, etc. none of which generate profit but is not likely to export any of its business which provides income whilst requiring no social support</p> <p>Until WFDC develop a policy of ‘town living’, the Council are not going to attract more retailers to Kidderminster. In fact further decline will occur with the increase of on-line shopping & the continual reduction in the number of banks building societies, etc. The Local Plan could give WFDC the ideal opportunity to develop a ‘town living’ policy. There are so many empty shops, offices & factories (e.g.Dixon St.) just crying out for conversion to flats/apartments.</p> <p>It is vital to protect as much green space as possible to make Kidderminster not only a pleasant place to live but also bring up children.</p> <p>The Local Plan Consultation Document refers to WFDC obtaining funds from B’ham & Solihull Enterprise Board & its duty to co-operate with them. A small authority is likely to be outmanoeuvred in any discussions with them, having vastly larger legal & financial departments, as has happened in Bromsgrove. If B’ham wishes to relocate overspill it</p>	

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				<p>would be difficult to resist especially when it offers ‘useful contributions’ to the development of Kidderminster station & the proposal to resurrect the by-pass.</p> <p>In order to achieve ‘Town Living’, not only to maximise use of derelict/empty shops, offices & factories for new homes, but also bring vibrancy to the town centre. Government has produced legislation to facilitate this. I m sure with the right approach WFDC can develop a proposal to meet the needs of its local population and maximise the use of brownfield sites across the District that is not led by developers looking towards Green Belt (regardless of its quality) and the needs of Birmingham & Solihull. The question is does WFDC have the courage, ambition and motivation to pursue such a course of action?</p>	
	LPPO2979	Development Strategy	Object	<p>People living in the Wyre Forest area have not been given notification of all the proposed planning that may go ahead in this district. There are thousands of people in this district who do not have a computer or indeed buy a local paper to know what is being planned for the area, Maps and proposed planning forms should be distributed to all people in this area, Also Councillors should be made to attend all meetings on planned proposals for their areas.</p> <p><u>Objections to further buildings in this area of Wyre</u></p>	<p>Objection and comments noted.</p> <p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14th August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. The drop-in sessions were all very well attended. Leaflets</p>

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				<p><u>Forest and on specific grounds</u></p> <ol style="list-style-type: none"> 1. I object to further buildings of houses in this area because if we continue to build houses etc all over Britain we will end up with no countryside at all and we will not be able to grow food on our great fertile soils or even feed ourselves with other countries suffering drought, fires, mud slides and war devastation. Gone will be our green and pleasant land. Also our water supplies will undoubtedly have to be rationed as will our food and electricity etc. 2. Birmingham our 2nd biggest city is suffering from bad pollution, if we persist in building our area into Birmingham the people in Wyre Forest will also suffer from such pollution. The Government should have sorted out the most important policy of immigration with Brexit rather than building more and more homes. I am very annoyed about this and that our Government has passed laws to override Council decisions over buildings. 3. The only buildings we need built are for industry and for a new hospital on the site of Lea Castle. We have a downgraded local hospital that can't cope with patients and neither can The Royal Worcester Hospital. Lives are being lost because hospitals in Worcs cannot cope 	<p>advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event was approved by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>

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				<p>4. The local Council has squandered money on new sport centres and baths when others didn't need replacing yet whilst we get fewer services than we did in the past and when council tax spirals out of control for what? We have our fire stations and police stations highlighted to close and this is a great mistake.</p> <p>5. Too many houses have already taken up good agricultural land and our roads and bridges cannot cope with our massive population already. It is criminal to build on Green Belt land and only Brownfield sites should be used for industry which is sadly lacking in this area. The only jobs which seem to be available are supermarkets, and the health service and charity shops and fast food shops which is a disgrace. Our towns are down and out places to go which is a dreadful state of affairs.</p> <p>6. What other EU countries keep destroying buildings and rebuilding all the time. Old schools could still be used and other Victorian buildings made to last</p> <p>7. On grounds of health and safety I object to further building in this area except for what I have mentioned.</p>	

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Part of Document	Key Issues Raised	WFDC Officer Comments
Paragraph 6.54	<ul style="list-style-type: none"> • We are not able to offer support to either Option A or Option B in their entirety as we consider that both options are likely to have significant harmful implications for biodiversity. We would therefore recommend a blend of the two options where site allocations likely to lead to significant adverse impacts on biodiversity are removed. • As the principal town the logic of allocating significant levels of development to the most sustainable settlement is understood and accepted. • A hybrid of the two approaches will be required to meet development needs over the plan period whilst maintaining a five year housing land supply and that further sites will need to be selected to support the delivery of housing. • This Options document represents another binary choice, Option A with supporting traffic and education support or Option B without. Was this document prepared to bias the choice towards Option A? • The lack of transparency and logic in key areas makes it very difficult to decide which option we would prefer 	A mixture of sites from options A and B are being taken forward.
Paragraph 6.55	<ul style="list-style-type: none"> • No mention that the option would have a greater impact on the communities affected than a more dispersed option, where the strains on infrastructure could be shared. • Disagree with homes being built on Green Belt land which is easily seen by people on a daily basis. This should be protected to ‘safeguard and enhance landscape character’. • Eastern bypass will not make Kidderminster a more attractive place for businesses. • Access and egress from Spennells already difficult. • WFR/ST/2 is a productive piece of arable land. • Development in this area would go over the small ridge and continue down to the settlement of Stanklyn which would encourage urban sprawl. • Development would put extreme pressure on local roads and make already busy highways in the area intolerable at peak times. • Consideration should also be given to spreading any development around the 	<p>Green Belt is not a landscape designation.</p> <p>Development to the south of Spennells (option A) is no longer proposed as part of this Local Plan.</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>three towns and not concentrate it all in one area.</p> <ul style="list-style-type: none"> • It is difficult to see where the money would come from for a costly relief road that has to pass over a main railway line. • There should be no erosion of the productive Green Belt land as there will be an increased need for the UK to provide more food production rather than import food once we have left the EU. • Loss of Green Belt will further endanger wild life, both flora and fauna. • Loss of Green Belt will also reduce the natural area for people to exercise, as the current areas have many public paths. • Health problems due to greater levels of engine exhaust emissions. • Current public transport is very poor and needs substantial investment to serve the current population levels let alone increased population. • A would be inappropriate until the Eastern By-Pass is completed and other alternatives explored. • Don't take away the natural beauty that Spennells residents are fighting for and are desperately trying to cling on to. • Dense development can result in social problems • Loss of public Rights of Way and a quality of life • Residents are not able to comment on whether a relief road would be appropriate or affordable • Loss of the natural break from the other nearby communities, creating an ugly urban sprawl. • The proposed housing is situated too far for most people to be able to walk into town so additional bus routes would be needed. • Green space is important for emotional and physical wellbeing. • Building on undeveloped land causes flooding. • Green spaces and farmland are important habitats for wildlife. • There are not enough jobs in the area to support this huge influx of people. This will render new developments commuter ghost towns and increase traffic on main roads. • Joining Spennells with the housing on Stanklyn lane is a perfect example of urban sprawl, something that the government have said should be avoided at all costs. 	<p>An eastern relief road is not longer being proposed. The existing road network will ne upgraded to allow HGVs to be routed away from Kidderminster.</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> • Why does an area with an almost static population need so many new houses? Is it because we are to be used as an overspill for Birmingham in the same way that Redditch is? • Please consider the possibility of incorporating the Lea Castle Hospital site into Option A, to minimise the impact on agriculture, environment and the Green Belt. Inclusion of Lea Castle Hospital into Option A, would also have a positive outcome for transport in the Spennells, Stone and Summerfield areas, with or without the Eastern Relief Road. • This new housing would not be ring fenced for local people. • There is no guarantee that benefits would happen! • Option A includes only area of Corn Buntings in Worcestershire. • We reject Option A particularly because of the larger Green Belt land take, scale and concentration of development and the negative impact upon local amenity biodiversity, health, wellbeing and community identity. • Challenge the validity and use of the Green Belt Review and the consequences this has, in respect of Option A, for the fields between The Spennells and Summerfield. • The Option A proposal will damage irrevocably the social amenity of and biodiversity in the fields which separate The Spennells and Summerfield and undermine the integrity and unique identity of the Summerfield community. • The land is breeding home to Skylarks which are red listed. • The proposed new road (the Eastern Relief road) would totally destroy this environmentally sensitive area with increased air pollution, more noise pollution, light pollution and the destruction of large amounts of natural habitats. • The need for an eastern relief road is not based on any sound traffic planning data. • Removal of the fields which could diminish the mental health and physical well-being of the people who use them. • The fields are extensively used by local people to walk, run, cycle walk dogs and ride horses. • Increased traffic, noise and higher emissions from exhaust fumes thereby increasing risk to health. 	<p>The Lea Castle site has been extended to take in the surrounding land parcels and a sustainable stand-alone community is proposed at this location.</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>Increased pressures on hospitals, doctors, dentists and opticians</p> <ul style="list-style-type: none"> • Loss of Green Belt status which protects our countryside from urban sprawl, threatening the existing public rights of way. • Loss of wildlife habitat. • Loss of good quality productive agricultural land. • It will not solve the housing crisis as the houses will not be affordable. • Lack of vision and seeks to doom Kidderminster to becoming a dormitory town for Birmingham without the necessary infrastructure to support it. • Presenting developers with the opportunity to build upon green field sites, currently outside of the Green Belt, will lead to urban sprawl to the southeast of Kidderminster, while brown field sites within the area remain undeveloped. • The options for redevelopment have been unfairly portrayed. Question 6.55 outlines benefits of Option A before asking for an opinion whereas question 6.56 outlines the disadvantages of option B before asking for an opinion. The document should be impartial and allow residents to create their own opinions and decisions independently and without influence from the council. • No comprehensive modelling of the Eastern Relief Road route benefits has been carried out and so the comments relating to the road in Paragraph 6.55 appear overly optimistic. • Biodiversity mitigation and enhancement necessitated by the road scheme will potentially have a detrimental impact on the developable area of nearby allocations and is likely to seriously limit their capacity to accept the proposed levels of growth. • We do not believe that the benefits offered by the larger scale development here outweigh the disadvantages. • if it were built it would only transport traffic from the bottleneck at Goldness Corner on the A449 slightly more quickly to the bottlenecks in Blakedown and Hagley on the A456. • Disproportionate focus of additional housing in Kidderminster. • Natural border removed between Wyre Forest and Wychavon. • Use of Green Belt only justified by proposed eastern relief road, which is only necessary if development proceeds. There is no need for the relief road without 	<p>Kidderminster currently has over half of the District’s population so it should be expected to take the majority of the proposed development.</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>the development as traffic can use the A450 from Hagley to Torton.</p> <ul style="list-style-type: none"> • Spennells is already too big. • The land behind Offmore is considerably higher than other development and would be very visible. • The sustainability report suggests local employment to support the additional 1700 homes will be available from the businesses on the Worcester Road and Hartlebury Trading Estate. I do not believe these will expand to support the potential numbers involved. • Part of Option A (Spennells) has been shown to be unacceptable mainly on the grounds of storm and foul water drainage and flooding issues. • I cannot see how subjective and unproven benefits would outweigh admitted disadvantages. • The ‘beauty of the countryside’ has been cited in the plan as an important criterion but has not been given sufficient consideration in Option A. • Option A will remove important wildlife corridors which connect sites of special scientific interest and nature reserves. • Option A infers the inclusion of an Eastern Relief road; I believe that this is being used as a dangling carrot to encourage people to support this option. There is no evidence that in reality the relief road is any more likely to happen with this option. • Option A will just provide a commuter estate and therefore secure the Bypass. • Suitable brownfield land and not Green Belt should be the priority. • The amount of housing you propose to build is completely unnecessary and based on figures that apply to our nation as a whole and not the local area's needs. • There aren't enough jobs in the area to support this huge influx of people. • Would support the integration of small developments of less than 100 houses to be spread across the district on a variety of Green Belt areas so as to reduce the pressure on local infrastructure and services. • The proposed development is 3 to 4 miles away from the town centre. • The shaping of Option A to justify the relief road to resolve pre-existing transport problems and air quality is not correct. The relief road will not help with air 	<p>Development will be kept to the lower levels with the higher land left as green space. This open space will remain in the Green Belt to prevent its future release for development going forward.</p> <p>The dispersal of development over a higher number of sites would mean that existing schools would not have the capacity to take the additional pupils generated. Providing 2 large developments would allow for new school provision and additional community</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>quality in the Horsefair as the majority of traffic to Birmingham from Worcester use the A450 Worcester Road, which should be enhanced and the Bridge raised to accommodate the larger vehicles instead of creating a very expensive and unneeded additional road basically running parallel to this.</p> <ul style="list-style-type: none"> • Stone parish is unfairly targeted in option A for housing and a relief road. • Option A does not address the need for affordable homes as prices will be too high for local residents as it's a low income area. • Current employment land lies vacant and unused on Worcester road since built what evidence is there that more is required and that it will be filled? • The by-pass will not add any growth to Kidderminster and will serve as a route to by-pass the town. • Offering A or Option B is a divisive and dangerous tactic — one that splits communities and gives way to resentment. • The current proposals (Plan A) seem to be filling people with anger, dread and upset. • This new housing would not be ring fenced for local people. • If Option A is selected then I believe the land at the rear of Spennells should be deleted from the Option as it is not needed. • Should Option A still be selected then I recommend the expanded Lea Castle site within Option B is transferred to Option A.6.55 • Asks that the hedgerow and trees which characterise Stanklyn Lane be reinforced by a tree belt of between 15 and 20 metres width to protect the character of this country road and to mark a clear line between town and country. • We would also ask you to consider deleting that section of the site between the A448 Bromsgrove Road and the stream and fishing ponds. In our view, this relative small area will have an impact on the openness of the countryside and the Green Belt well in excess of what its size might imply. It will also effectively remove any gap between Stone and Kidderminster. • Several footpaths and bridleways will all be affected by the development of this area. We are not opposed to these paths becoming urban in character but would be opposed to development that was not sympathetic to their ability to continue to serve a valuable community function 	<p>facilities to be provided.</p> <p>An Employment Land Review has been undertaken by specialist consultants and updated in 2018 to reflect the latest requirements. The requirement for employment land in the plan period is closely linked to the housing requirement.</p> <p>The land alongside the A448 forms part of the Hoobrook LWS and will be protected from development. This area will not be removed from the Green Belt. The development in OC/13N will be screened from the A448. Views to/from St. Mary's Stone will be protected.</p> <p>An extensive network of footpaths will be provided as part of the proposed</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> • Ramblers will be concerned that the road is bound to have a serious impact on the footpath network by forming a barrier to walkers’ ability to cross it • Development in the smaller towns and rural villages would help to support these areas through the provision of additional housing including affordable housing, as well as local jobs through construction. • Option A fits in with WFDC's plans for the redevelopment of Kidderminster, its Eastern Gateway, has good transport connections especially with the ability to support an Eastern Relief Road. • Option A is not perfect but does bring infrastructure which will decrease the overall impact. • Would still wish the Council to promote ‘brownfield sites first’ whilst they are still available and also to prioritise public sector land. • It addresses more of the strategic proposals with which I agree. • Plan A is more likely to attract new residents because of access to employment, education, shopping and other services. • Option A gives something to the area in terms of educational and transport facilities and so seems preferable to option B which will further overload existing stretched facilities. • Concerned that the release of land to the south east of the Lea Hospital site as proposed in Option B will have a significantly greater impact on the West Midlands Green Belt than will the Option A proposals. • Additional housing requires more investment in infrastructure/employment/communication links and new housing to the north and east of Kidderminster could attract businesses • Support the councils preferred option A, because building the majority of the houses on the Spennells and Lea Castle would be the most attractive for those people who choose to live in the Wyre Forest but their employment is within the surrounding towns and cities. • Eastern Relief road would benefit everyone in the Wyre Forest. It would help to relieve the congestion within central Kidderminster and be convenient for residents on the new estate who commute to Birmingham and the Black Country. Also new schools are proposed for the extension to the Spennells 	<p>development which will link into the wider existing public rights of way network.</p> <p>Proposals in the Local Plan will allow for affordable housing sites to come forward in the rural villages.</p> <p>Public sector land is proposed for allocation through the Local Plan.</p> <p>Significant additional landscaping is proposed alongside the release of land at Lea Castle to mitigate for adverse impact on the open landscape.</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>estate.</p> <ul style="list-style-type: none"> • It seems that Option A would include new infrastructure whereas Option B will not include any. • I am in favour of keeping new homes near to potential employment site, schools and services whenever possible to reduce the travelling and pollution. • Support the Kidderminster Relief road, and development to the East of Kidderminster. • With the financial incentives available from the developers who develop these sites, it surely makes sense to concentrate them all in one area, where the incentives are large enough to make a difference, i.e. new schools, road improvement and community facilities rather than spread them throughout the District, thereby diluting the effectiveness of these financial incentives. • It seems logical to base houses closer to employment hubs, major transport links (rail & road) and where there's potential for increased school provision. • Transport links, accessibility, and the provision of services including educational have been positively accounted for in the proposed Option A. • The benefits of Option A outweigh the disadvantages as long as the new infrastructure is built/developed at the same time as the housing to make it a sustainable development. It also ensures that there will be sufficient school places for the new residents. • Option A is on the best side of Kidderminster, improving road access to Bromsgrove, M5, M40, M6. • Employment - All proposed new employment opportunities are being shown on the maps as being in the Kidderminster area so it would make sense to build the new housing nearer to these jobs. 	<p>Concentrating development to the east / north-east of Kidderminster will allow for easy access to rail stations by sustainable modes. This would not be so true if development was concentrated elsewhere in the district.</p>
Paragraph 6.56	<ul style="list-style-type: none"> • We do not believe that Option B as it is currently set out offers a sustainable solution to development at present. • The District Council is not in control of the provision of a relief road/school provision and cannot guarantee their provision. • Option B is more reasonable and realistic, but I would still question whether the existing infrastructure can support such a large number of new houses and the 	<p>Some of the Option B sites are being taken forward. Capacity is available in local schools to absorb pupils coming from these sites.</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>families that will live in them.</p> <ul style="list-style-type: none"> • Option B requires the acquisition of numerous sites making the process slower and more complex. • Reluctantly supports Option B, but does not think they have been offered a fair choice at all. • I do not support option B. I would urge you to consider the requirements of local residents, rather than those of large developers. • Housing should be spread as equally as possible across Wyre Forest so that it does not negatively impact one side/area. • In favour of a sensibly modified Option B • Neither option envisages a community that could be centred in the midst of the development. • Much fairer to spread the developments. • People prefer to have a choice of area to live in to be close to existing friends and family so I believe spreading out development would be better for the people of Kidderminster. • Object to Option B. • Green Belt must be protected at all costs, use brownfield sites first for any houses/schools and doctors. • The sites in Areley Kings are not feasible and opposed. • Plan B would add to the traffic on the Areley Kings side of the bridge. The infrastructure would never cope with more cars. The schools, doctors and roads are at breaking point now. • It seems that Option A would include new infrastructure whereas Option B will not include any. • Option B is more dispersed and will not bring any improvements but will worsen traffic congestion on Bewdley and Stourport bridges and affect the air quality in Dunley Road area. • Green spaces and farmland are important habitats for wildlife, some species of which are rare/endangered. • The amount of housing you propose to build is completely unnecessary and 	<p>It is proposed to bring forward one of the Areley Kings sites but at a much lower capacity as local schools cannot accommodate the larger number of pupils. Transport modelling has shown that this would not impact significantly on existing traffic. Work is underway to relocate GP surgeries in the town. A large area of informal open space will be provided on the site.</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>based on figures that apply to our nation as a whole and not the local area's needs.</p> <ul style="list-style-type: none"> • There aren't enough jobs in the area to support this huge influx of people. This will render new developments commuter ghost towns and increase traffic on main roads. • Loss of Green Belt will further endanger wild life, both flora and fauna. • Loss of Green Belt will also reduce the natural area for people to exercise, as the current areas have many public paths. • Current public transport is very poor and needs substantial investment to serve the current population levels let alone increased population. • Lack of infrastructure. • Does not come with any new infrastructure. Any development west of the River Severn will increase congestion and pollution in both Stourport and Bewdley. • Option B fails to take into account pressures on local services such as doctors, police and fire that an additional 1547 families will make to Stourport's already oversubscribed amenities. • Option B advocates urban sprawl in many different parts of the district. • If option B is selected, what plans are proposed to manage the extra traffic that is bound to arise with hundreds more houses expected? • Plan B has disadvantages, inc. access to facilities/traffic congestion. • A new Kidderminster Eastern Relief road will ease congestion but Option B will bring no new benefits and worsen current traffic congestion in Bewdley/Stourport esp. Bridge area. • The district Council is not trying hard enough to use the brownfield sites that are available. • Option B is totally unsustainable in that it places a lot of additional development the wrong side of the river in Stourport-on-Severn, creating increased traffic pressure on the bridge, pressure on existing schools in Areley Kings and there is little provision for shopping nor any medical provision that side of the river. • Loss of countryside, which is well used and loved by the local community. • It would deprive the locality of less good quality agricultural land. 	

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>Support:</p> <ul style="list-style-type: none"> • More benefits from dispersed strategy. • Option B is preferable because it develops the community as whole not just Kidderminster. • Employment opportunities are located throughout the district so makes sense to have the housing also dispersed throughout the district so that local people can live closer to where they work, especially as local transport is poor. • Option B also helps to preserve open space between Kidderminster and the village of Stone. • Option B details the type of change that would benefit the local area in the long run. • Support option B, because it already has existing development. • Option B would give greater opportunity for quality design and local distinctiveness. • Option B is less extreme, less impact in any one area. • Ability to build a greater number of houses, in areas where they are needed for local expansion. • support Option B because of the lower Green Belt land take and the lesser disadvantage to the Summerfield (and Spennells) community. • Option B plans for a larger number of houses, in areas where they reflect the local need. • Option B does not require the additional policing costs suggested in section 4.4.9of the WFIDP. • Less likely to attract overspill from B’ham/Solihull, therefore genuinely can be said to meet local needs across the District. • Will not require the construction of the essential Option A relief roads. • The various housing developments can run concurrently across the District, without major disruption, achieving the housing requirements more quickly. • Flexibility. Dispersed development is more able to react to changes than one large scale development. • Diversity. Spreading the development across the district will allow Stourport, 	<p>A mix of the 2 options is now proposed with development in all 3 towns plus provision for limited development in the rural settlements.</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>Bewdley et al to benefit rather than growing Kidderminster alone.</p> <ul style="list-style-type: none"> • Prefer Option B as it utilises 20% less Green Belt land. • Lower impact on transport, schools and other local services. P • People will also be able to integrate more easily into the local community rather than becoming a satellite estate on the outskirts. • Option B does not need as much roadwork 	
<p>Paragraph 6.57 General Comments</p>	<ul style="list-style-type: none"> • Green Belt land should only be considered as a last resort if all other options have been exhausted. • We <u>must think</u> of the future how best to make Kidderminster a pleasant & welcoming place to live. • Refurbishing and developing Kidderminster town would be an excellent opportunity to bring the once beautiful buildings back to life. • We may need to consider building upwards – high rise flats. • Rural expansion outside of the Green Belt should be allowed where landowners were prepared to provide at least 50% affordable homes/starter homes. • A combination of Options A and B is most appropriate. • Housing around the town centre would help regenerate Kidderminster. • Can the council find a way to reduce property taxes to encourage small retail businesses back into the town and improve local economy? • Development should be spread across the whole district to ensure that urban sprawl is contained and building is within existing boundaries. • The Council should not allow land with planning permission to be ‘land banked’ and should lobby Parliament to ensure this is against the law. • Building a large number of houses along the eastern edge of the district would not encourage growth from within. • If there is a need for more, why not housing like mobile homes, modern, compact but permanent with communal laundries and gardens. • Compulsory Purchase Orders should be made on some of the larger vacant shops. • The amount of shop frontage in Kidderminster is in excess of need. 	<p>Proposals will include revitalising Kidderminster Town Centre with new residential developments and conversions of empty historic buildings.</p> <p>Sites will be expected to comply with affordable housing policy of 30% provision. A mix of house types / sizes and tenures will be required on allocated sites ranging from 1 – 4 bedroom dwellings.</p> <p>Once planning permission is in place, sites will be expected to be brought forward.</p> <p>The problem of large empty retail units is a national problem in large towns. Worcester Street is to be opened up to traffic and</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> • A large proportion of the existing retail zone in the centre of Kidderminster could be reallocated to housing. • Need to ensure there are no shortfalls in housing provision, especially in early years. • Build bungalows to free up family homes. • The plan should promote centralised housing development that reduces the dependency on car travel and lowers Co2. • Housing needs to run in conjunction with employment. • Development should be dispersed across the district as equally as possible so that no one area alone has to bear the brunt of the associated negatives. • WFDC should not build on any Green Belt land until all brownfield sites have been developed first. • Use existing empty properties in the town centre e.g. Woolworths site for a leisure complex (cinema/bowling alley) leaving Lionfields / Bromsgrove Street for residential. • There is supply for 10 years if Lea Castle is developed.. No Green Belt site to be released until housing needs are reviewed after 10 years. • Further Review needed to check housing need and available brownfield sites. • Empty homes need to be utilised before any building work on new homes begins. • Future planning permissions given should have a time period that states any building work is started & completed within a set time scale. • Our area needs to be more innovative in our buildings and become a known area for a sustainable district of innovative non traditional building method. • Opportunities to rid Kidderminster of unsightly and often derelict properties. • I can't see any mention of eco-housing. Surely all proposed housing should far exceed minimum insulation standards and incorporate solar panels as standard. • Development that allows for the building of the eastern relief road enables people to be connected to major road networks, allowing them to commute without getting gridlocked in town traffic. • We need suitable housing for elderly people to downsize to. • You have not demonstrated that there are insufficient brownfield (or green field 	<p>residential uses on upper floors are being implemented.</p> <p>Proposals / plans are well advanced on a number of large brownfield sites and it is hoped that these will come forward for development in advance of any Green Belt sites. Much of Lionfields is likely to be used for residential uses.</p> <p>The housing need has been recalculated using the recently adopted standardised methodology from Government. Planning permission is usually only valid for 3 years. A start on site must be made in that time.</p> <p>All housing needs to meet minimum building standards.</p> <p>With a rapidly expanding elderly population it is important to provide suitable</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>non-Green Belt) alternatives</p> <ul style="list-style-type: none"> • Support infill development to south of Kidderminster. • ‘Political will’ at national level needed to deter land banking. • Focus on development areas and not a long featureless strip as current. • Many small business owners find it difficult to lease small offices. All that is proposed are large industrial units, there should be a mix. • Would love the council to carry on rejuvenating the town itself and make it a pleasurable place to visit with more restaurants, maybe an entertainment venue for concerts, shows. • Revisit all ‘vacant’ property in Kidderminster and the use of CPOs as required. Approach Housing associations to support with this. • The development of the inner town must be the priority long before any further outward expansion of Kidderminster is even dreamed of. • Kidderminster has great potential; it has canals and rivers and a few years ago was a thriving market town surrounded by beautiful country side, but if we are not careful it will become a commuter town that no one wants to visit. • Kidderminster does not need a Multicomplex cinema and more shops. • Whichever options are chosen the road network needs significant improvements to maintain safety and minimise congestion. • The present road between Black Bridge and Hagley should become a major dual carriageway with housing near it to rid the Worcester Road Island of its bottleneck. • Commuters to Birmingham and Worcester desire to live in the country. Build more villages on some green field sites outside Kidderminster to give people this option. This would disperse the concentration of people entering an already grid locked system. 	<p>accommodation for this age group. This will include smaller dwellings and also C2 provision for those unable to live on their own.</p> <p>Employment proposals are land allocations. The Employment Land Review has shown a requirement for smaller workshops / move-on units to be provided.</p> <p>Many of the brownfield redevelopment sites have river/canal frontage. Development just beyond the town centre has proved very popular with towpath links direct to the town centre. These wildlife corridors should also be enhanced as part of any redevelopment.</p>

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Company / Organisation	Response No	Para / Policy	Type of Response	Summary of Response
Worcestershire Wildlife Trust	LPPO1049	6.54	Comment	<p>We are not able to offer support to either Option A or Option B in their entirety as we consider that both options are likely to have significant harmful implications for biodiversity. We would therefore recommend a blend of the two options where site allocations likely to lead to significant adverse impacts on biodiversity are removed. In particular we would recommend the complete deletion of the Core Site FPH1 (Settling Ponds, Wilden Lane) because of the unacceptable biodiversity implications arising from any development here. Mitigation for biodiversity impacts elsewhere will be required under both options and it is therefore not the case that there is a clear 'best' option to take forward in terms of biodiversity protection and enhancement. Notably however, impacts will be especially challenging to mitigate successfully at sites on the eastern edge of Kidderminster, meaning that pursuing Option B (i.e. with reduced levels of housing) in this area may offer significant advantages. Option B also has positive implications in terms of reducing overall Green Belt take and potentially offering more 'headroom' to the housing numbers, which in turn may allow for more on-site flexibility to accommodate GI. Taken together these are important benefits and we do not believe that they are outweighed by the difficulties set out in the consultation document. In particular we do not believe that the case for the eastern relief road has been robustly demonstrated in the evidence base for the Plan and so we do not as yet consider it to be a strong reason to pursue Option A.</p> <p>We provide further details of our position under the relevant allocation policies but here we also wish to raise a more general point regarding the evidence base on which the allocations and Options have been progressed to date. So far as we can ascertain there is no site by site analysis detailing likely biodiversity impacts in the evidence base for the Plan and it is not clear how biodiversity implications have been accounted for in the decision-making process. We are particularly concerned to see that the Sustainability Appraisal (SA) for the Plan concentrates simply on designated sites (Sites of Special Scientific Interest and Local Wildlife Sites) under SA Objective 9 rather than encompassing wider biodiversity as we recommended during the scoping process. At the very least we consider that the council should be taking into account habitats and species of principle importance as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The legal duty imposed on the council in this regard is set out in Section 40 of the Act and we strongly recommend that the evidence base is re-visited to take</p>

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Company / Organisation	Response No	Para / Policy	Type of Response	Summary of Response
				account of this. We believe that the failure to consider habitats and species outside designated sites represents a fundamental shortcoming in the SA and may undermine the decisions taken so far. This is underlined by the overall SA finding that ' <i>it would be expected that both options would have a significant positive effect on the district's biodiversity</i> ', which we consider to be highly unlikely at the moment. Further work to determine the impact of proposed allocations will be required to ensure that the Local Plan is based on sound evidence and can be progressed in line with the law and relevant planning guidance (see for example NPPF paras. 9, 17, 109,110, 117, 157 and 165). We would be pleased to discuss this fundamental issue with the council with a view to improving the evidence base for the Local Plan if that would be helpful.
Bromsgrove & Redditch DC	LPP0898	6.54	Comment	The main concern of the Council is the location of the larger core housing sites, the fact that a preferred option is not specified, and that we are requested to make a choice of option A or option B in relation to significant development. The core housing sites, and also the majority of the option A and B sites are all situated towards the eastern / north eastern extent of the urban area of Kidderminster. As the principal town the logic of allocating significant levels of development to the most sustainable settlement is understood and accepted.
North Worcestershire Water Management	LPP0925	6.54	Comment	Regarding preference for option A or B: As it is clearly set out in national planning policy that development should only be considered if it is not at risk of flooding and will not increase flood risk to others in theory none of the sites should have a negative impact upon flood risk. Having to position development outside floodable areas and having to include flood mitigation measures can obviously impact upon the viability of a site. However, this is on a site by site level and I therefore believe it is virtually impossible to have a preference for option A or B purely from a flood risk point of view, as both options contain sites that are partially at risk of flooding. I would say that in my experience it is easier to get a good surface water drainage scheme together for a number of larger sites than it is to get good schemes for a whole range of smaller sites. Based upon this, I have a slight preference for option A.

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Company / Organisation	Response No	Para / Policy	Type of Response	Summary of Response
Gladman Developments Limited	LPPO1422	6.54	Comment	<p>Gladman believe that a hybrid of the two approaches will be required to meet development needs over the plan period whilst maintaining a five year housing land supply and that further sites will need to be selected to support the delivery of housing to meet objectively assessed needs in full. This approach will enable the strategic infrastructure requirements to be delivered and could also support the sustainability of settlements across the district through the release of small and medium scale sites that are favoured by SME builders. As part of the plan preparation process it is essential that development needs are met in full, with sufficient contingency provided to demonstrate an effective strategy is being brought forward. A review mechanism would allow needs of neighbouring authorities to be taken into account.</p> <p>Need to use evidence base to select both Green Belt and non-Green Belt sites. Consider that additional sites to those put forward under options will be needed.</p>
	LPPO2401	6.54	Comment	<p>If new builds are to take place, then the brownfield sites should be used first and then other land within the existing Green Belt boundary before you even start to think about redefining the Green Belt boundaries. There are many areas/ sites in Kidderminster that could be used first. Referring to Options A or B, the Eastern Bypass should be built anyway as some traffic relief is needed now between the Worcester Road and Birmingham Road and this will be increased, irrespective of whether you choose Options A or B. There is insufficient employment in the town to support the additional increase in population, so therefore they will have to commute to their places of work, adding to more congestion on already crowded roads in and around Kidderminster.</p> <p>It was said at one of the presentations we attended, that the building of new properties around the towns would encourage companies, whose employees live in the new builds for a few years, to relocate to this area. I don't think so, look at the number of shops and units we have already vacant in and around the town. We have seen a gradual decline in industry and retail over our years living in the area. Businesses will only move to this area if they are offered generous packages to do so.</p> <p>Due to the poor planning in Kidderminster in the past, the town now has no heart. The town centre manager said or intimated on H & W recently when questioned about Worcester Street</p>

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Company / Organisation	Response No	Para / Policy	Type of Response	Summary of Response
				<p>and the number of empty shops that the chances of increased retail in this area were dead, so why are we proposing to open up Worcester Street at a cost of nearly £1000000? I think, if I heard correctly, if there is no chance that these shops will be filled.</p> <p>I think that the County and Town planners need to revisit and rethink their strategies over the future of Kidderminster and the surrounding areas. We accept that there is and will be a need for new housing, it is the method which is used to achieve the end result.</p>
	LPPO4694	6.54	Comment	<ul style="list-style-type: none"> • This plan basically states where housing is currently located, that is where the new development should take place. This will see the city centres getting busier, but the more rural environs becoming more deserted. Where is the planning to address this issue? • My biggest concern with this Options document is this represents another binary choice, Option A with supporting traffic and education support or Option B without. Was this document prepared to bias the choice towards Option A? <p>If Option B is preferred for development location, that should not be used to penalise the quality of living after.</p> <p>I say this because I prefer the location of development to be Option B but with the traffic and educational support included within Option, but apparently to be denied in Option B. I feel we have had enough of all or nothing choices, so called fear or hope choices-we need to get this right for the future for us and our children</p>
	LPPO4803	Option A	Object	<p>Option A has a more concentrated strategy than Option B. This may make it easier for the planners and builders but there is no mention that the option would have a greater impact on the communities affected than a more dispersed option, where the strains on infrastructure could be shared.</p>
	LPPO5107	6.54	Object	<p>We have been asked to state a preference for option A or B as set out in the above Plan. Whilst it is accepted that the Wyre Forest District Council have an obligation, placed on them by Central Government, to produce a Local Plan that meets a set of pre-defined criteria, we have strong but logical objections to both options in the above current Local Plan. The lack of transparency and</p>

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Company / Organisation	Response No	Para / Policy	Type of Response	Summary of Response
				logic in key areas makes it very difficult to decide which option we would prefer. If the stated forecast of housing needs was accepted as fact which we do not accept and the choice had to be made solely on the grounds of the impact on the Green Belt then Option B would be preferred since it requires a lower percentage of Green Belt land than Option A. However we set out below the reasons why Option A and the core developments in Option A and in Option B should be rejected.
	LPP02969	Option A	Comment	Option A fits in with WFDC's plans for the redevelopment of Kidderminster, its Eastern Gateway, has good transport connections especially with the ability to support an Eastern Relief Road. Can provide the necessary support structure such as schools and recreational areas.
	LPP03019	Option A	Comment	Option A is not perfect but does bring infrastructure which will decrease the overall impact.
	LPP03021	Option A	Comment	There is limited choice as the 'core sites' appear to be predetermined. Given that choice, my preference is for option A, but some of the option sites in both A and B seem more sustainable than some of the core sites. For example the site identified as Wyre Forest Golf Club, corner of Kingsway, is isolated from the main development and town centre of Stourport. A more sustainable location nearer the centre and next to existing school provision would appear to be the now disused former Wyre Forest Golf Club land off Kingsway next to the Burlish schools. There may be sufficient land there to obviate the need for some or all of the 'core sites', some of which appear to have boundaries based on ownership, rather than spatial features. With regard to schools whilst the additional need arising from the new housing seems to be recognised, there doesn't appear to be any sites identified. I would still wish the Council to still promote 'brownfield sites first' whilst they are still available and also to prioritise public sector land.
Shrawley Parish Council	LPP01392	Option A	Comment	Shrawley Parish Council wishes to make no observations with regards to Option A, proposed developments on the eastern side of Kidderminster.

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Company / Organisation	Response No	Para / Policy	Type of Response	Summary of Response
	LPP01838	Option A	Comment	Preference: Option A, but disagree with homes being built on Green Belt land which is easily seen by people on a daily basis. This should be protected to ‘safeguard and enhance landscape character’.
	LPP01975	Option A	Comment	1. I am concerned that much of the proposed housing is on greenfield sites used by local communities. This is a serious loss. Are there really no brownfield sites left to develop?
	LPP0684	Option A	Comment	We would like to make the following points: <ul style="list-style-type: none"> 1. Plan A is the most attractive to us. 2. Plan A gives Kidderminster the opportunity to improve its local amenities in a substantial way. 3. Plan A is more likely to attract new residents because of access to employment, education, shopping and other services.
	LPP0278	Option A	Comment	Option A with a new road, and infrastructure built is the only way forward.
	LPP0298	Option A	Comment	I would support Option A and it addresses more of the strategic proposals with which I agree,
	LPP03150	Option A	Comment	Option A is preferable as the problem of increased traffic would be addressed with the construction of a new road.
	LPP02370	Option A	Comment	Not shown in searches when buying house Prefer Option A as includes bypass, insufficient existing transport infrastructure in Stourport.
	LPP04917	Option A	Comment	If Option A is selected then I believe the land at the rear of Spennells should be deleted from the Option as it is not needed. If it were still to be included then I would want assurance that development would not start until “core Sites” have been finished including the expanded Lea Castle site within Option B.

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				Should Option A still be selected then I recommend the expanded Lea Castle site within Option B is transferred to Option A.6.55
	LPP04653	Option A	Comment	<p>In effect, both Options A and B suggest ribbon development. Neither option envisages a community that could be centred in the midst of the development.</p> <p><u>Option A</u> assumes the building of a Kidderminster Eastern Relief Road. Who would pay for this? Developers could not be expected to pay for the bridge that would be needed.</p>
	LPP04622	6.55	Comment	If I had to vote for a proposal it would obviously have to be A as this seems to be the least invasive of the green areas as a whole.
RSPB Midlands Regional Office	LPP04407	Option A	Comment	<p>Specifically we wish to help answer the consultation question posed in paragraph 6.54.</p> <p>The RSPB is a nature conservation charity, and therefore our comments below relate solely to nature conservation issues as they affect the choice between Options A or B. We do not have a mandate to comment on other issues including landscape impact, traffic, etc.</p> <p><u>Summary:</u></p> <p>If Option A is chosen the impact on wildlife of local and County importance (specifically, the local corn bunting population) is likely to be greater, and would prompt the need seriously to examine the scope for large-scale habitat compensation in the form of species-rich grassland creation for corn buntings, as part of the development package.</p> <p>Our initial assessment of the land affected by Options A and B was that none of the areas put forward as development options were of significant value for nature. The areas affected are predominately farmland under intensive arable production, or improved pasture. The species present in those fields and hedgerows are likely to be widespread and familiar animals and plants found across the wider countryside in similar farmed habitats. Many of them are in decline but this is happening nationally, and in the main, the most effective solution to halting those declines</p>

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				<p>does not (yet) lies with defending individual fields from development. In almost all respects we believe there is little to separate Options A and B, in terms of impacts on wildlife.</p> <p>Our initial assessment was broadly confirmed, very recently, by data received from West Midlands Bird Club (WMBC). We understand WMBC plans to send this same information to you as part of their own response.</p> <p>However, the one exception to the above assessment was WMBC’s data on corn buntings SE of Kidderminster. The data shows that 1km grid squares in the Stanklyn Lane area of SO8473, SO8474, SO8574 and SO8577 collectively support a population of corn buntings likely to be of at least county importance, and possibly regional importance in the West Midlands. The area seems to be particularly important as a wintering ground for significant numbers of corn buntings, with a small but important breeding population as well.</p> <p>Corn buntings were once very common birds of open grasslands and cereal fields across England, but numbers have crashed over the past few decades, to the point that we now face the real prospect of county-level extinctions in the West Midlands in the next decade or so.</p> <p>Corn buntings are already effectively extinct in Wales, and, we believe, Herefordshire. The bird is now Red-listed as a species of high conservation concern in the UK, following a catastrophic population decline of 90% or more since 1970.</p> <p>Having said above that the future of farmland wildlife does not depend on defending individual fields, for a few species like corn buntings a site level response is now justified if we are to hang on to the remaining 10% of the population. This is especially true in areas like Worcestershire, where corn buntings are on the very edge of their diminishing range. Getting wildlife <i>back</i> into a landscape once it has been lost is enormously more difficult and costly than making sure those species do not disappear in the first place.</p> <p>It is not possible to accommodate corn buntings within the layout of new housing estates. There</p>

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				<p>will need to be off-site compensation, and this must consist either of managing the remaining farmland better for corn buntings, or creating new flower-rich grassland adjacent to that farmland on a large scale. Calculations based on average corn bunting densities in different habitat types combined with WMBC data on the size of the local corn bunting breeding population suggests that an area of at least 200 hectares of grassland habitat will be needed.</p> <p>Obviously, this would have significant additional benefits for other wildlife, including pollinators, and could also contribute significantly to the strategic green infrastructure network to serve residents as much of it could be accessible to the public, most of the year.</p> <p>Obviously, achieving such compensation will be costly and difficult, not the least of which is ensuring its long-term management.</p> <p>For all these reasons, the RSPB favours Option B. However, if Option A is selected we recommend further consultation with WMBC to identify how and where best such compensation can be delivered. The RSPB would also be happy to advise further.</p>
	LPPO4485	Option A	Comment	<p>If Option A is selected then I believe the land at the rear of Spennells should be deleted from the Option as it is not needed per my points above. If it were still to be included then I would want assurance that development would not start until “core Sites” have been finished including the expanded Lea Castle site within Option B.</p> <p>Should Option A still be selected then I recommend the expanded Lea Castle site within Option B is transferred to Option A.</p>
	LPPO3615	Option A	Comment	<p>I would like to comment simply that Option A gives something to the area in terms of educational and transport facilities and so seems preferable to option B which will further overload existing stretched facilities.</p>
	LPPO3737	Option A	Comment	<p>If option A entails an eastern route around Kidderminster, I think with common sense that this would be preferable to a western route.</p>

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	LPPO3823	Option A	Comment	My general concern is that the burden of new housing developments in the WFDC area need to be shared across the area and not almost entirely along the eastern boundary of Kidderminster which is essentially Green Belt land which is currently used as arable land growing essential food crops.
	LPPO3856	Option A	Comment	<p>Once these areas have been developed, further options could be explored if necessary, in 5-7 years time.</p> <p>I do not support either option. Please consider the requirements of local residents, rather than those of developers in this plan, as well as the implications of destroying the local countryside, which is well used and loved by the local community. Have a look at brownfield sites first.</p> <p>The Kidderminster Eastern relief road appears to take traffic from one busy road and feed it into another! A wider-scale review of the traffic round the Kidderminster area is needed, not merely an additional road.</p> <p>Please take this project one step at a time. Things change very quickly on a local, national, economic and demographic basis. Please think about the residents of Kidderminster and do not destroy their town.</p>
	LPPO3962	Option A	Comment	<p>I would love to see a regeneration programme that really lifts the spirits of the people of Kidderminster.</p> <p>I am always happy to welcome change that improves the area for people. The current proposals (Plan A) seem to be filling people with anger, dread and upset.</p> <p>Is there any way the council planning could come up with some proposals that would enhance the Wyre Forest and make it an area we would be proud to live in?</p>

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				<p>In the light of the Kidderminster/Stourport link road, my vision would include:</p> <ul style="list-style-type: none"> • Repurposing empty units and building new units in Stourport Road area to provide retail (like Primark) and companies (like OGL). • Look at what attracts people to the Merry Hill and include those shops in this area to encourage people to stay and shop local. • Relocate all the warehouse companies from New Road to the Stourport Road area. • Build all the affordable housing you require on New Road. Young people will be most attracted to this area because of its close proximity to the Railway Station and Town Centre. <p>The following makes me feel happy. The thoughts of :</p> <ul style="list-style-type: none"> • Providing affordable housing very near the town centre and railway station. • Regeneration of the current town centre to provide excellent retail and attract shops. • more businesses with highly paid jobs • bungalows with beautiful views lots of generous sized rooms and a nice sized plot for well off elderly people to encourage old people to move from their family homes • New spacious four bedroom houses with beautiful views, three/four reception rooms, quite large garden, definitely not open plan and overlooked. • Relieving congestion and making journeys to work easier. • Regeneration of parks that are free for people to visit. • Helping schools regenerate and develop, to help them be the best they can be for the young people in our area. • Hospitals providing the best care for all local people. <p>The following makes me feel sad: The thoughts of:</p> <ul style="list-style-type: none"> • Only retail, tourism and leisure jobs being provided. • 50% of the extra houses on the Green Belt land on the edges of town being for

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				<p>affordable housing that are a stepping stone to help people get on the housing ladder and not forever homes, beautiful houses/bungalows.</p> <ul style="list-style-type: none"> • A new road near housing that will create noise and pollution. • Turning the top of Spennells from a desirable, quiet, place to live, on the edge of town to a dreadful place to live. • Taking away habitat for wildlife. • Taking away free green space for Spennells people to visit on foot. <p>I am highly concerned about the Plan A and the standard of living to be offered to people living near a railway line, industrial park and a busy main road A449 and the proposed new road. They would not be within close proximity of the railway station or the town centre.</p> <p>This new housing would not be ring fenced for local people. I do believe that the developers would do a good advertising job of their large new estate that would result in a large influx of people not local to the area and most likely commuters.</p> <p>If a few houses are developed here and there this would be less likely to attract large numbers of people that are not local to the area.</p> <p>Please consider creating:</p> <ul style="list-style-type: none"> • Housing within close proximity of the railway station (easy walking distance). • Housing within close proximity of the town centre (easy walking distance).
	LPP04074	Option A	Comment	<p>I neither fully support option A or B as they stand at present. Housing should be spread as equally as possible across Wyre Forest so that it does not negatively impact one side/area. I also would also not support Lea Castle becoming a huge estate because of its surrounding road links. I do not support any surge to push housing onto Lea Castle so that building does not have to occur to the South/Spennells area or Stourport— any building should be fair to ALL areas and the load</p>

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				<p>shared. There is argument that south of the town is better access to the motorways. I do not support building on the land opposite the entrance to Lea Castle. I am in support of a relief road, but were this not in the final plan then even more the need to ‘spread the load’ in terms of housing and commuting as well as easing traffic in already busy and congested areas. Controlling traffic flow/safety is paramount. Planning must take on board residents’ concerns so as not to disadvantage people like myself who have lived in Kidderminster and the surrounding areas all their life. People need to feel that Wyre Forest District Council is there for all its people.</p>
<p>Ramblers Association</p>	<p>LPPO4134</p>	<p>Option A</p>	<p>Comment</p>	<p>Ramblers has strong views on the need to protect the open countryside and especially around major conurbations with such instruments as Green Belts the options offered in the Local Plan Review are not really very palatable to our organisation. However, we have concluded that Option A offers the best solution to the problem. We have reached this conclusion on the basis that it is important to maintain the separation of the 3 towns in the District, to protect the beautiful Severn Valley, the character of the two smaller market towns and the countryside to the west. We are also concerned that the release of land to the south east of the Lea Hospital site as proposed in Option B will have a significantly greater impact on the West Midlands Green Belt than will the Option A proposals.</p> <p>We do have some concerns about the proposal to release the large area of land to the south east of Kidderminster. In order to restrict its impact on the open Countryside we would ask that the hedgerow and hedgerow trees which characterise Stanklyn Lane be reinforced by a tree belt of between 15 and 20 metres width to protect the character of this country road and to mark a clear line between town and country.</p> <p>We would also ask you to consider deleting that section of the site between the A448 Bromsgrove Road and the stream and fishing ponds. In our view, this relative small area will have an impact on the openness of the countryside and the Green Belt well in excess of what its size might imply. It will also effectively remove any gap between Stone and Kidderminster.</p> <p>You will be well aware that several footpaths and bridleways will all be affected by the</p>

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				<p>development of this area. We are not opposed to these paths becoming urban in character but would be opposed to development that was not sympathetic to their ability to continue to serve a valuable community function. We shall also be opposed to their being subsumed within the urban road network. Urban footpaths need to be traffic free as are their rural counterparts not reduced to mere pavements at the sides of roads. Developers and designers should be made aware that existing features like these historic paths, hedgerows and trees should be incorporated within their designs.</p> <p>Paths should be incorporated into the green spaces as far as possible and where they cannot be found a function alternative paths should be provided to compensate for their loss. These issues should be included in a design brief which should be required as part of Policy 31. In addition, you should consider requiring an obligation towards improvements to the footpath network between this site and the town centre, employment areas, local shops, leisure facilities and the open countryside to ensure that they are fit for purpose.</p> <p>In addition to the public rights of way, there are many other regularly walked paths within the site which may or may not have accrued public right of way status. I have made a record of these and I would expect developers to have regard to these in so far as the paths have achieved a public status.</p> <p>My final comment regarding this particular site is that I note that the development is intended to fund the construction of the Kidderminster East Relief Road. None of the maps accompanying Local Plan review document appear to show its location. Ramblers will be concerned that the road is bound to have a serious impact on the footpath network by forming a barrier to walkers' ability to cross it. Suitable safe crossing points will be needed if the network of paths is to function properly. In addition, it is likely to have an adverse impact on the appearance of the countryside and contribute noise and air pollution. Once we have details of the alignment and design of the road we will be able to comment more effectively on this proposal and on proposed mitigation measures.</p>

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	LPPO2277	Option A	Object	<p>NO benefits do not outweigh disadvantages. Eastern bypass will not make Kidderminster a more attractive place for businesses. Where are the new employment opportunities going to arise for people to walk/or cycle to work – they will not walk/cycle from the area to “EASTER PARK / Trading estate”.</p> <p>Route and details of eastern road not known, and where will access to new development be? Access and egress from Spennells already difficult and since the traffic lights were installed for the link road long queues. If a massive housing estate built for people who will not be able to obtain employment in Kidderminster the whole area will further become a commuter expansion town. Option A does not “Respect the Green Belt”.</p>
	LPPO2309	Option A	Object	My objection is generally against option A but also against all building on Green Belt.
	LPPO2144	Option A	Object	<p>I do not agree with the proposed change of the Green Belt between Spennells estate and Stanklyn Lane and so I object to the adoption of Option A for the following reasons:</p> <ul style="list-style-type: none"> • The area WFR/ST/2 is a productive piece of arable land. The statement in the Green Belt review: “Landscape character and condition is of average quality, but with some evidence of the withdrawal of active land management evidenced through poor crop growth (in contrast to arable cultivation on land immediately to the north east)” is incorrect. I would suggest that the survey was done at the time when these fields had been put down to clover • Development in this area would go over the small ridge and continue down to the settlement of Stanklyn which would encourage urban sprawl. • This is a useful green space for wild life and humans. Home to Sky Larks and bats. • Development would put extreme pressure on local roads and make already busy highways in the area intolerable at peak times. • Pressure would be placed on the existing infrastructure such as medical treatment and schools. • There appear to be a number of Brown Field sites in Kidderminster before Green Belt is considered. Has the site once occupied by Wyre Forest Golf Club been included in the

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				<p>review?</p> <ul style="list-style-type: none"> Consideration should also be given to spreading any development around the three towns and not concentrate it all in one area.
	LPPO2159	Option A	Object	<p>We refer first to your request for residents to choose between options A and B of this Review. We prefer neither but wish to comment on their relative merits. In your document the choice is clearly presented in favour of Option A based on two major considerations: 1. provision of educational, medical and community facilities and 2. Provision of a relief road between the Worcester and Birmingham roads. It appears that this advice is related to planning convenience for WFDC. Our comments are:</p> <ol style="list-style-type: none"> Wherever additional housing is built, extra facilities will need to be provided whether they be centralised in just one conglomeration, or existing provisions are expanded to suit needs. It is difficult to see where the money would come from for a costly relief road that has to pass over a main railway line. Funding has been refused before in less stringent financial times and you have provided no evidence that any would be forthcoming in the present case. It is difficult to see how the 'promised' provision of a ring road with option A can, for the purpose of this Review, be ensured. <p>If one of the two options A or B has to be chosen then Option B would be the most equitable way of accommodating the suggested housing requirement rather than creating a continuous belt of housing between Stanklyn Lane and Baldwin Road.</p> <p>Non-Green Belt sites available for building can provide in the region of 3000 houses. This number should surely be more than sufficient for local needs.</p>

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	LPPO2262	Option A	Object	<p>I would strongly recommend that you drop option A. Why can't you build on brownfield first when there are plenty of sites in Kidderminster crying out to being redeveloped first? Parts of Kidderminster town centre have been derelict for years now like the old post office and Woolworths just for starters.</p> <p>Then there is the problem with schools where are all the children going to go when they are already overflowing.</p> <p>The extra traffic will cause mayhem during the rush hour its bad enough now at certain times of the day.</p> <p>You are planning to build on green fields where there is plenty of wildlife at the moment but that will all disappear once you start building on.</p> <p>Have you even thought of the drainage problems this will have when we have heavy rain the drains can not cope building extra houses will only make this worse.</p> <p>Then what about all the people who use the fields for exercise and taking there dogs for a walk. And the people who exercise there horses on this land.</p> <p>Where are all these extra people going to go to the doctors, hospital when the NHS is already struggling in this area?</p>
	LPPO2268	Option A	Object	<p>We oppose the adoption of the Local Plan, both Options A & B including the Core Areas of The Captains and the Lodge because :-</p> <ol style="list-style-type: none"> 1. There should be no erosion of the productive Green Belt land as there will be an increased need for the UK to provide more food production rather than import food once we have left the EU. 2. Loss of Green Belt will further endanger wild life, both flora and fauna.

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				<ol style="list-style-type: none"> 3. Loss of Green Belt will also reduce the natural area for people to exercise, as the current areas have many public paths. 4. Proposed building on areas designated as natural flood plans seems fool hardy, as there is plenty of local evidence showing the damaging effects this can have on other areas. I.e. Bewdley, Upton on Severn, Tewksbury etc; 5. Loss of Green Belt will add to the global warming effects that are projected. 6. The increase in population predicted in the new plan will not be able to be employed within Wyre Forest and will thus need to commute to Birmingham and West Midlands, and Worcester. The Wyre Forest has seen a reduction in manufacturing over the last 5 to 10 years in trades that rely on large numbers of workers. Any new businesses are more likely to be high tech and requiring less personnel. 7. Due to item 6 above, roads will become more heavily congested, causing more health problems due to greater levels of engine exhaust emissions. 8. The existing trunk road system in and around the Wyre Forest area is currently running at full capacity with no real plans evident to address the situation. 9. Increased population will need more health facilities both at GP level and Hospital. Wyre Forest has seen Kidderminster Hospital services progressively reduced and this would need to be reversed. Likewise more GP surgeries would be required and the concern there seems to be a national shortfall in GPs. Whilst the Government states that more will be trained, the Royal College of GPs has revealed that some 20% are likely to leave. It is not clear in the Proposed Local plan if the areas required for additional medical facilities are included in the plan or would be additional to it. 10. Current public transport is very poor and needs substantial investment to serve the current population levels let alone increased population.
	LPPO2422	Option A	Object	<ul style="list-style-type: none"> • Objects to Spennells development. • Attack on the natural world and residents of Spennells. • There are other sites, including brownfield sites, which could be used. • Wyre Forest Golf Club could be used.

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				<ul style="list-style-type: none"> Disconcerting that the council has not explored other options for development. Like to go for walks etc. around the countryside at Spennells - development would take this away. No matter how many artificial gardens or concrete playgrounds you build nothing can equate to nature.
	LPPO2432	Option A	Object	<ul style="list-style-type: none"> Objects to option A. Shouldn't use Green Belt land before utilising brownfield sites. Conservative policy is to build on Green Belt land only in 'exceptional circumstances' - this is not the case if Kidderminster. Town centre needs regeneration and is a disgrace. Spennells fields should be retained for future generations. In addition I feel that if Option A is adopted, traffic problems will increase greatly and air pollution will worsen in the Spennells area with potentially a major road and many more cars.
	LPPO2482	Option A	Object	After viewing the options proposed, we feel that Option A would be inappropriate until the Eastern By-Pass is completed and other alternatives explored.
	LPPO2486	Option A	Object	<p>No one in their right minds would consider the use of this glorious natural resource as acceptable.</p> <p>I often use this as a necessary recreational activity as a way of escaping from the mental prison I find myself in.</p> <p>If this area is taken away there is no where else similar within walking distance where I could reach in order to enjoy the countryside.</p> <p>There are a bunch of other factors like traffic load, lack of infrastructure, already low water</p>

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				<p>pressure in the area.</p> <p>Please don't take this area away from people like me.</p>
	LPPO2490	Option A	Object	<p>In a dying town such as Kidderminster, we do not need more families moving in, fighting for jobs that do not exist.</p> <p>Schools would need to be built to accommodate new children.</p> <p>I strongly object to Option A – in a dying town such as Kidderminster, we do not need more families moving in, fighting for jobs that do not exist, schools that would need to be built to accommodate new children moving into the area. It's a ridiculous idea.</p> <p>I am absolutely disgusted that the Wyre Forest District Council is considering building on our surrounding GREEN BELT! The Green Belt is about the only thing that Kidderminster has left to be proud of! Don't destroy this like you have the town centre that is now a ghost town thanks to the development of Weavers Wharf.</p> <p>Don't take away the natural beauty that Spennells residents are fighting for and are desperately trying to cling on to!</p> <p>Preserve the natural beauty that we currently are very lucky and privileged to enjoy.</p>
	LPPO2507	Option A	Object	<ul style="list-style-type: none"> • Preservation of Green Belt land for recreation is essential for health. • Impact on wildlife • Dense development can result in social problems • Residents are not able to comment on whether a relief road would be appropriate or affordable.

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				<ul style="list-style-type: none"> The Plan B option slightly preferred as it uses less Green Belt/has easier road access to the Hagley road. Blakedown Station car park capable extension, Kidderminster's is not This plan would also avoid the coalescence of two districts and would exacerbate existing congestion and pollution
	LPPO2585	Option A	Object	<p>Loss of green field space (Denying me open space) which is in walking distance, and being replace by increasing levels of noise and car pollution.</p> <p>Loss of public Rights of Way and a quality of life for my grand children and future generations.</p> <p>With such a large-scale build, surely it would make sense to create a new town elsewhere in the area.</p> <p>Planning it this way would ensure adequate funding for its own infrastructure. Instead of relying on the existing schools, doctors, road network etc.</p>
	LPPO2683	Option A	Object	<p>I am writing to strongly object to the building of extra housing as explained under the draft Local Plan Preferred Options A and B. My reasons are as follows:</p> <ul style="list-style-type: none"> The population of Kidderminster over the last few years has remained fairly static and this proposal will unnecessarily attract more people into a market town that is currently ill equipped to handle such an influx. Both Options will involve the loss of a tremendous amount of Green Belt and agricultural working farm land. Option A would be far more disastrous, and would also result in the loss of wildlife in the nearby woodland areas. I believe the Council has a duty to protect these Green Belt areas and the wild life that lives there for future generations. Loss of local footpaths and bridleways, where many of the local residents and indeed schoolchildren spend recreational time, and indeed is the very reason why many people

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				<p>have chosen to live here!</p> <ul style="list-style-type: none"> • The building of houses under Option A, and to a lesser extent Option B, will cause the loss of the natural break from the other nearby communities, creating an ugly urban sprawl and eat into the lungs of Kidderminster. Furthermore, additional housing would increase the Carbon Footprint. • Heavy traffic on local roads which are not suitable for the amount of housing proposed. They are always in a poor state of repair which can only get worse, requiring additional Council spend. • The proposed housing is situated too far for most people to be able to walk into town so additional bus routes would be needed. • There will be an over capacity for local schools, doctors and hospitals. • At a time when the nearest fully functioning hospital is already stretched to capacity and under special measures and the local Kidderminster hospital is operating as a “drop in centre”, what guarantees can the Council make that the necessary and sufficient amenities for healthcare would be actually provided? • With BREXIT looming and the uncertainty that it will bring to the ability to forecast public spending, how can the Council justify increased expenditure on infrastructure and services necessary to support an expanded community, without jeopardising their ability to remain in office? • What Job opportunities are available for an increased population in a run down and depleting Kidderminster, where shops and businesses are closing at an alarming rate? Could this mean that eventually people will want to move away from Kidderminster to seek employment, ultimately defeating the object of attracting them there in the first place? <p>I urge the council to throw out both Option A and B, not to destroy beautiful Green Belt and wildlife areas that can never be replaced, and to spend the money primarily on regenerating a rundown Town Centre. However, if it is proved to be a definite need for additional housing, then reluctantly Option B would be my preference.</p>

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	LPPO2758	Option A	Object	Object to Option A
	LPPO2825	Option A	Object	<p>In OPTION A the fields in Area 3 are productive farmland bordering a site of SSI effect on wildlife; development will:</p> <p>Impact on the biodiversity of site/result in loss of open spaces for recreational use and hospitals/doctors surgeries will be overwhelmed?</p>
	LPPO2710	Option A	Object	<p>Please note my objections to both Option A and Option B. First of all, there are areas common to both Options, on Green Belt land. Does this mean these cannot be questioned?</p> <p>My objection is not that Kidderminster needs no additional housing, but Green Belt land should not be used:</p> <ul style="list-style-type: none"> • Green space is important for emotional and physical wellbeing • Green space is a diminishing resource and should be protected. Once it is gone it cannot be regained • Loss of farmland will lead to insufficient food for the Country – imports are costly and cannot be guaranteed, especially with Brexit looming • Building on undeveloped land causes flooding. When land is covered by concrete/tarmac the surface water runs off and has to go somewhere. Broadwaters is already prone to flooding by the park, building at the top of the hill can only make this worse • Green spaces and farmland are important habitats for wildlife, some species of which are rare/endangered. From my garden I have personally seen deer, grass snakes and bats. Bats are a common sight in the evening – during the last few years I have found a dead long-eared bat and a horseshoe bat in my garden so I know for certain that those species live in the Hurcott area. <p>Kidderminster’s infrastructure cannot cope with this expansion – schools, doctors, dentists and roads are insufficient. Numerous schools in the town have been closed over the last 10-15 years</p>

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				<p>– presumably the Council decided they were undersubscribed. Which is the mistake? Shortsighted decision then, or the apparently imminent population explosion now?</p> <p>Kidderminster Hospital has been downgraded. The closest A&E department is now a 45 minute drive from the town. This will cost lives in times of emergency.</p> <p>Urban sprawl on the scale proposed is not in keeping with Kidderminster’s semi-rural character. The size of development planned for the north east side of town is massive – 1100+ houses in a tranche will completely alter the character of the town and destroy Hurcott Village, spoiling a historic area forever. The roads around the Park Gate public house, Hurcott Lane and Birmingham Road are already dangerous with numerous accidents occurring. The massive increase in traffic which would result from these plans would worsen the accident rate and cause gridlock. The Clensmore development has made the Horsefair congestion much worse as no change to the road system was included. Further development on this side of town will only add to this.</p> <p>Properties on the Silverwoods development remain unsold; why is there now a need for such massive development when there appears to be insufficient demand already? This huge building project was supposed to solve Kidderminster’s housing needs for the foreseeable future. Once again this contradicts decisions made by the Planners. Was the mistake then or now?</p> <p>There are not enough jobs in the area to support this huge influx of people. This will render new developments commuter ghost towns and increase traffic on main roads.</p> <p>I believe Kidderminster should use all of its brownfield sites before any further destruction of green sites is even considered. There are numerous factory sites and sites where schools have been closed – apparently these schools were not required but now they are needed again to support the massive expansion plans! The site at Sion Hill has planning permission but is still lying derelict. Crown House in the town centre is an eyesore and could be used, as well as the plethora of empty shops and offices in the town. This would rejuvenate the town centre; at the moment it</p>

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				is dying. To summarise, I do not agree with Plan A or Plan B. I believe there is no need for such urban expansion.
	LPPO2725	Option A	Object	Objection to the whole draft local plan for Wyre Forest.
	LPPO2853	Option A	Object	I strongly object to Option A.
	LPPO2870	Option A	Object	<p>Page 30 5.13 Option A proposes a gross loss of 2.4% total Green Belt Land across the district and Option B a gross loss of 1.9%. Most sites are on high quality agricultural land and its loss cannot easily be mitigated. Redevelopment of Brown field sites has the potential for a significant positive effect.</p> <p>OPTION A - Loss of Green Belt status which protects our countryside from Urban sprawl, and threatens the existing public Right of Way, which is good for the health and wellbeing of the population. Loss of good quality, productive agricultural land; crops are regularly grown, barley in 2017; according to Agricultural Minister, we need our agricultural land.</p> <p>Loss of wildlife habit, skylarks, Linnets and other red listed birds nest in these fields, and there are protected Bats along Stanklyn Lane.</p>
	LPPO2914	Option A	Object	<ol style="list-style-type: none"> 1. Kidderminster cannot take volume of traffic the A448 and A449 are congested enough already. 2. So many of our schools have closed already and the remaining ones are under so much pressure. 3. Our hospitals in Worcestershire are full to capacity. 4. Use brown field sites first, Lea castle, Sion Hill School, The old magistrate courts, Crown house, Green street Worcester street and Park Lane all have empty buildings. 5. The wild life Skylarks, Kestrels, Starlings are protected what about their habitat are they

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				<p>become extinct.</p> <ol style="list-style-type: none"> 6. The Green Belt needs to be protected less food and animal fodder will be grown if more Green Belt Land is taken. Farming is a way of life. 7. Units at Easter park are still empty what about employment.
	LPP02956	Option A	Object	<p>Reasons why he objects to option A</p> <ol style="list-style-type: none"> 1. 1: The impact on the local wildlife would be catastrophic. There are many endangered species living on this land. 2. Joining Spennells with the housing on Stanklyn lane is a perfect example of urban sprawl, something that the government have said should be avoided at all costs. 3. Building so many houses in one area with no new shops, schools etc. is plain ridiculous. 4. No Green Belt land should be built on until every single inch of brownfield has been used. When is the council going to realise that Worcester Street will never be the busy shopping street it used to be. The arrival of Weavers Wharf, Merry Hill & the Internet have combined to see to that. Every building on the one side of Worcester street could be knocked down (Woolworth's side) & replaced with housing. What about crown house? No building firm is interested in developing that site so why not turn crown house into flats? There are many other sites within the area where housing could easily be built. 5. Why does an area with an almost static population need so many new houses? Is it because we are to be used as an overspill for Birmingham in the same way that Redditch is? If that is the case & you still insist on building on the Green Belt why not use land on the way to Blakedown? This is closer to Birmingham & would help to keep extra traffic out of Kidderminster. I would be especially interested to hear Marcus Hart's answer to this point. 6. Profit is much higher for building firms when they are allowed to build on the Green Belt so I can see why they are so keen to go ahead with option A. Also the council would get a lovely new Road linking the A449, A448 & A456 for free as well as a nice lump of cash.

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				<p>But is this worth losing such a large amount of our beautiful countryside for? If the council decide it is I think that will prove once & for all that the lunatics really have taken over the asylum.</p>
	LPPO2897	Option A	Object	<p>Housing Need: Does the district need the number of dwelling suggested in option A? The Preferred Options document states that the local population has remained relatively static since 1991 and has grown at approximately one third of rate of the West Midlands. Employment opportunities in the district have decreased considerably since 1991, with the demise of the carpet, and local engineering industries. This would suggest that the number of dwellings planned for Option A, is in excess of the actual requirements of the district during the period of the Plan, and could be readily met by Option B.</p> <p>Roads: Option A would put considerable pressure on already busy roads. The residents of around 3700 dwelling accessing the A449 and A448 is unlikely to be helped by the Eastern Relief Road. Spennells Valley Road links the A449 and the A448 and there would be a considerable increase in volume of traffic, resulting in even slower flow at peak times and increased pollution.</p> <p>Schools: The catchment area of the proposed option A would be serviced by schools with limited numbers of free places. Even if more places could be made available at the local schools (unlikely due to available land), this would contribute to pressure on roads as schools would be accessed via A449 and/or A448. The review suggests the possibility of new schools being built to accommodate the increase population. I understand the new schools would only be considered only after 1000 new dwellings have been built and occupied.</p> <p>Agriculture Green Belt & Environment:</p> <ul style="list-style-type: none"> • Option A uses a large area of productive agricultural land. • <i>Green Belt</i> - The Preferred Options document suggests that there would be limited effects of merging of communities with Option A. I believe that the effect would not be

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				<p>limited and that Stone, Stanklyn Lane Summerfield would be largely subsumed into the enlarged Spennells Estate.</p> <ul style="list-style-type: none"> <i>Environmental Impact</i> - Increased traffic in the Spennells access roads would lead to additional pollution, not only for residents but also children attending local schools. Heronswood Primary and the small local shopping area attract a high volume of traffic in the mornings and after school in the afternoon. An additional 1700 homes are also likely to make a contribution to air pollution. <p>Finally: If Option A, was the chosen option, please consider the possibility of incorporating the Lea Castle Hospital site into Option A, to minimise the impact on agriculture, environment and the Green Belt. Inclusion of Lea Castle Hospital into Option A, would also have a positive outcome for transport in the Spennells, Stone and Summerfield areas, with or without the Eastern Relief Road.</p>
	LPPO3008	Option A	Object	<p>The proposed expansion by up to 6000 dwellings and associated infrastructure represents a potentially very significant increase in the size of the population of Wyre Forest. Option A would concentrate most of this in Kidderminster increasing the population of the town in the order of 30% (according to the figures in section 2). Whilst concentrating the expansion into a few large developments would limit the number of existing residents affected, the impact on those affected would be disproportionately higher.</p>
	LPPO3011	Option A	Object	<p>I welcome change that improves the area for people. The current proposals (Plan A) seem to be filling people with anger, dread and upset.</p> <p>I am highly concerned about the Plan A and the standard of living to be offered to people living near a railway line, industrial park and a busy main road A449 and the proposed new road. They would not be within close proximity of the railway station or the town centre.</p> <p>This new housing would not be ring fenced for local people. I do believe that the developers would do a good advertising job of their large new estate that would result in a large influx of</p>

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				<p>people not local to the area and most likely commuters.</p> <p>If a few houses are developed here and there this would be less likely to attract large numbers of people that are not local to the area.</p>
	LPPO3031	Option A	Object	<p>Question 2 - Benefits easier delivery of school provision/Eastern Relief Road v. effect of large-scale of expansion to the east of Kidderminster</p> <p>Answer. - No, because history has shown there is no guarantee that this would happen!</p>
West Midland Bird Club	LPPO1533	Option A	Object	<p>We strongly object to both proposals because of the devastating effect these proposals would have on all wildlife within the planned areas. This land is Green Belt Land, South of Spennells and WFDC Core area, East of Offmore Estate. These areas should be maintained for farming and for recreational use such as walking and bird, butterfly and moth surveying. The public foot paths and bridle ways are used daily by both residents and visitors.</p> <p>Option A includes only area of Corn Buntings in Worcestershire.</p> <p>It is our view no consideration has been given to the wildlife in the areas you intend to build on be it a Relief Road or houses. The words (<i>No nature conservation Issues</i>) is clearly not a correct. To support our views that these proposals should be rejected we enclose a number of documents:</p> <ol style="list-style-type: none"> 1. WMBC Members Records who visit both the Green Belt Land and Core Areas on a regular basis throughout the year. 2. Records from the British Trust for Ornithology Bird Track System. 3. Records sent direct to the Worcestershire County Recorder by Bird watchers either local or visitors of which there are many.
Summerfield Against Land Transformation	LPPO1620	Option A	Object	<p>We reject the scale of development and the concentration of housing required for the Kidderminster Urban Extensions - as set out in Option A.</p>

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				<p>We reject Option A for all the following reasons but particularly because of the larger Green Belt land take, scale and concentration of development and the negative impact upon local amenity biodiversity, health, wellbeing and community identity:</p> <ul style="list-style-type: none"> • The Option A proposal will damage irrevocably the social amenity of and biodiversity in the fields which separate The Spennells and Summerfield and undermine the integrity and unique identity of the Summerfield community. • With reference to the Green Belt Review: Land to the r/o Spennells/Easter Park (13.48 hectares — 200 dwellings); Land off Stanklyn Lane (27.4 hectares —> 350 dwellings); Captains and The Lodge (4.59 hectares — 135 dwellings) and Stone Hill (89.37 hectares —> 2000 dwellings). A total of 2685. This is development on a wholly unacceptable scale. The Green Belt review itself concedes this would have a “most significant impact” on the Green Belt to the SE and NE of Kidderminster, that the “identity of Summerfield would change” and would do nothing to protect and enhance existing site and biodiversity interests . However, “master planning could mitigate the direct visual impact of development and hence the perception of spillage of the town into open countryside.” • We challenge the validity and use of the Green Belt Review and the consequences this has, in respect of Option A, for the fields between The Spennells and Summerfield, particularly the impact upon social amenity, biodiversity and the integrity and identity of Summerfield • We have ready access via PRow and other footpaths to wonderful green space which is used by riders, cyclists, runners and walkers for recreational and leisure purposes. We also enjoy the biodiversity and geodiversity whilst exercising, all of which helps to address obesity and promotes positive mental health • The land is breeding home to Skylarks which are red listed. Other species of birds also frequent this area including the red listed Lapwing and Marlin. There is real concern regarding the Skylarks and Lapwings who nest on the ground are in decline in Worcestershire and the rest of the United Kingdom. Even the Green Belt review conceded that development will not enhance biodiversity. • Any reduction in Green Belt near Stanklyn Lane would irrevocably change the quality of

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				the landscape by reducing the amount of prime agricultural land, open countryside and damage the rural character of Summerfield. The unique identity and integrity of the Summerfield community would be threatened.
Wyre Forest Green Party	LPP01404	Option A	Object	The proposed new road (the Eastern Relief road) would totally destroy this environmentally sensitive area with increased air pollution, more noise pollution, light pollution and the destruction of large amounts of natural habitats.
	LPP01642	Option A	Object	Object to option A as its Green Belt; brownfield sites should be considered first. Local infrastructure - roads, traffic, schools, doctors insufficient/local hospital has no A&E. Kidderminster town centre is worst it's ever been half the shops are empty/rates are high. Houses could be built on former Glades old site, Park Lane, Mill Street, the old PO and above the shops in the town centre. Given £1.4 million cost of renovating 3 derelict cottages in the Horsefair then we should do so before touching Green Belt.
Spennells Against Further Expansion	LPP01742	Option A	Object	We object to Option A.
	LPP01842	Option A	Object	I would like to object most strongly to option A proposed development of Green Belt land adjacent to Spennells and Stanklyn Lane. <ul style="list-style-type: none"> Green Belt land MUST NOT be used as an easy, cheap option. It should only be used after all available brownfield sites are used, and even then should be used only if there is no alternative to further expansion. The need for an eastern relief road is not based on any sound traffic planning data. This would not reduce in anyway town centre rush hour traffic, and this is where the focus should be. Traffic trying to leave the Spennells or Offmore estates to get to the town centre would not be using this road.

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				<ul style="list-style-type: none"> This Green Belt land is within walking distance of a large part of the population of Kidderminster who use it for general exercise, dog walking and this type of recreational activity. If this is no longer available residents will be forced to drive to other areas, thus increasing the traffic and pollution. This area is a large agricultural production area which is needed to feed the growing population.
	LPP01936	Option A	Object	<p>I object to the whole of Option A:</p> <p>This new development will lead to :</p> <ul style="list-style-type: none"> Removal of the fields which could diminish the mental health and physical well-being of the people who use them. The fields are extensively used by local people to walk, run, cycle walk dogs and ride horses. Increased traffic, noise and higher emissions from exhaust fumes thereby increasing risk to health. Increased pressures on hospitals, doctors, dentists and opticians Loss of Green Belt status which protects our countryside from urban sprawl, threatening the existing public rights of way. Loss of wildlife habitat Loss of good quality productive agricultural land
	LPP01937	Option A	Object	<p>I object to both Options and I think it should be re-thought. This is a massive decision for Wyre Forest so we must be sure to get it right. Protect all Green Belt as far as possible.</p>
	LPP01886	Option A	Object	<p>Concerned about both option A and B. Questioning the evidence to prove that building on the Green Belt is actually needed. Believes development of Green Belt should be avoided in light of: Brexit - it very productive farm land which will be of benefit to the country and local farmers if tariffs are placed on produce grown in Europe. The Green Belt stops communities merging into</p>

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				<p>one another and becoming yet another urban sprawl. Believes that the council should consider the needs and well-being of local people and put them at the forefront of their decision making. Both options also mean a disproportionate amount of housing development would centre on and around Kidderminster, which does not have the infrastructure to support it. Questions where does the money come from to provide new schools for these developments? Challenges the need for so many homes in the area. The growth forecasts on the OAHN have been over-inflated, as there has not been significant rise in the local population in the past 10-15 years. Concerned about employment in the Wyre Forest as most people commute to bigger towns and cities to work. Concerned about traffic congestion caused by commuters.</p> <p>Challenges the belief that not enough Brownfield sites are available. Suggests further development on the Silverwoods site and the Lea Castle campus. Also, Burlish Top Golf Course has been closed for about a year and, I believe, will not open again as a gold club viable for business venture, as there is already sufficient provision in the area. It is common knowledge that the golf course is not viable agricultural land as it is of very poor quality and would provide space for hundreds of homes (and possible school). There is also the old Parsons Chain site in Stourport.</p> <p>My preferred choice of the two, as it has less impact on Green Belt land, especially with regards to the fields adjacent to Spennells. Spennells Estate is already a large housing development and even option B is going to put pressure on the roads, amenities and school – which is already at capacity. Green spaces are extremely important for the well-being and mental health of everyone and the proposed development field in option B contributes to the physical and mental health of all who use it.</p> <p>The field is also important for wildlife and biodiversity. Red-listed birds, such as skylarks and linnets, use it as a valuable nesting site, as well as supporting other wildlife such as foxes, badgers, hedgehogs, sparrows and blackbirds. The hedgerow which runs from Spennells to Stanklyn Lane on the east side of the field is old and consists of a variety of mature species, e.g.</p>

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				<p>hazel, oak, elderberry, hawthorn and blackthorn and many species of birds use it for nesting.</p> <p>As a resident of Stanklyn Lane, believes it is totally remiss of Wyre Forest to impact on our community in the way that both options, but particularly option A does. Building right up to the boundary of Stanklyn Lane would completely change the semi-rural nature of this lane. If traffic was allowed to exit the new development onto Stanklyn Lane, the land would not cope. This is a country lane with no proper pavement for the majority of it and used regularly by horse riders, joggers and cycle clubs, not to mention walkers and dog walkers, none of which would cope with extra traffic. At one end of the lane the exit is onto the over-busy, accident riddled A449 Worcester Road, and at the other end there is a 90 degree sharp, blind bend before the exit into the Bromsgrove Road which is at the bottom of Stone Hill where traffic comes down at speed.</p> <p>Although I reluctantly support option B, I do not think we have been offered a fair choice at all and if this is indeed a consultation exercise, perhaps the planning policy team will take on board the objections I and hundreds of others in the Wyre Forest have submitted and come up with a better thought out option C. Finally, it seems unreasonable that an unelected planning policy team and a few local councillors on the planning committee have the power to make such momentous decisions that will have such a detrimental impact on so many people's lives. Some of the planning committee also have Green Belt land earmarked for re-designation in their ward and will naturally be under pressure from residents to oppose development there and instead vote for it in another ward. I hope that this will not be allowed to happen.</p>
	LPPO2180	Option A	Object	<p>I strongly object to the loss of Green Belt to build the proposed number of houses specified in option A.</p> <ul style="list-style-type: none"> • There is a need for affordable housing, however by building on Green Belt, you lose the environment that makes somewhere a great place to live. To remove this seems very unfair when there are so many other areas of the district crying out for regeneration, making the area look tired and worn out. • Social isolation is a huge issue and also obesity and mental health. Access to this Green

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				<p>Belt provides valuable, meaningful interactions with others, increasing mental and emotional wellbeing. The area is used by people of all ages to exercise; walking, running, cycling, horse riding, etc, alongside other leisure pursuits such as photography, bird watching, painting.</p> <ul style="list-style-type: none"> • The Green Belt is teeming with wildlife, some of these (skylarks, corn buntings, bats) species are protected. It reduces pollution, helps with flooding, and provides valuable farmland. • The town centre is deserted at the top. Surely areas such as that, the old Glades, Lea Castle and Sion Hill School would be better sites for development. <p>Once the Green Belt is gone we'll never get it back.</p>
	LPPO2192	Option A	Object	<ul style="list-style-type: none"> • Static population growth - no need for new houses. • Aging population downsizing - freeing up family sized houses. • High obesity levels - why build on Green Belt land where leisure and exercise activities occur.
	LPPO2203	Option A	Object	<ul style="list-style-type: none"> • Targeting Comberton, Spennells, Offmore and Stone communities. • Serves only to defile natural countryside. • Devalues houses in the surrounding area. • Why build houses in an area with a high price range if the aim is to house poorer citizens? • It will not solve the housing crisis as the houses will not be affordable. • Should refurbish dilapidated areas to increase market value. • Expanding on Spennells will only devalue the area making it harder for people to buy/sell existing houses.
	LPPO2205	Option A - Spennells	Object	Further expansion will put a strain on local services.

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	LPPO2206	Option A	Object	<ul style="list-style-type: none"> • Objects to building on Spennells. • The creation of homes on Spennells/Offmore is unnecessary and damaging to the local environment. • Why build on Green Belt when there are brown belt sites available. • Developing brown belt sites will create housing which can be purchased by local residents - the houses being proposed will be unaffordable to locals. • If brown belt land is not utilised what about using Wyre Forest Golf Club? • The countryside is a place people can exercise. • We are told to buy local produce but if fields are built on where will the crops be grown? • Rich building companies are irresponsible and don't care about the environment. • The plans are toxic to the area and people. • Replanting saplings in the new development will not make up for what it taken. • Once the green land is gone - it's gone. • Don't want to lose our beautiful countryside.
	LPPO2231	Option A	Object	<p>I feel that many of the aims for the future of our local area are good. However, while I appreciate the need for the local council to make adequate provision for future housing, both for local people seeking affordable homes (including those seeking social housing) and to provide some housing which will encourage higher wage earners to move into the area, I do not feel that Option A meets this need and that Option B would be preferable.</p> <p>In the past the local council has shown lack of vision in planning. I fear that Option A shows further lack of vision and seeks to doom Kidderminster to becoming a dormitory town for Birmingham without the necessary infrastructure to support it. My views are not based upon 'Not in my backyard' but because I care about the preservation of Green Belt and realistic improvement of the local area for local people.</p> <p>My main concern is that presenting developers with the opportunity to build upon green field sites, currently outside of the Green Belt, will lead to urban sprawl to the southeast of</p>

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				Kidderminster, while brown field sites within the area remain undeveloped.
	LPP02238	Option A	Object	The options for redevelopment have been unfairly portrayed. Question 6.55 outlines benefits of Option A before asking for an opinion whereas question 6.56 outlines the disadvantages of option B before asking for an opinion. In order for this document to fairly ask for people’s opinions without swaying their judgment then both options should be weighed up with advantages and disadvantages before asking for the opinions of residents. The document should be impartial and allow residents to create their own opinions and decisions independently and without influence from the council.
Worcestershire Wildlife Trust	LPP01051	Option A	Object	<p>We do not believe that the evidence base underpinning the Local Plan as yet demonstrates a compelling need for the proposed eastern relief road. In particular we note that no comprehensive modelling of the route benefits has been carried out and so the comments relating to the road in Paragraph 6.55 appear overly optimistic. Whilst some of the other benefits may accrue as a result of the increased development proposed in Option A we do not believe that the evidence base demonstrates with any clarity that they would not also be available in the absence of the road or indeed under Option B, which would still deliver development at a scale requiring appropriate infrastructure (including GI). This is particularly the case because the very considerable biodiversity mitigation and enhancement necessitated by the road scheme and required by policies in the Local Plan and NPPF will potentially have a detrimental impact on the developable area of nearby allocations and is likely to seriously limit their capacity to accept the proposed levels of growth.</p> <p>Accordingly, and in light of comments we make elsewhere regarding the risk to biodiversity caused by the Option A proposals in this area, we do not believe that the benefits offered by the larger scale development here outweigh the disadvantages. As we make clear in our response to Policy 6D it is our opinion that given the very significant environmental issues likely to arise from the relief road it may be better to seek alternative access arrangements, including improvement to the existing network of roads in the area, and a reduced quantum of development in this area until such time as the evidence demonstrates that there is an overriding need for the relief road.</p>

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				Please see our response to Policy 6D – Kidderminster Urban Extensions for further details.
	LPP0509	Option A	Object	None of these options but another option
	LPP0610	Option A	Object	<p>Object to option A. I don't think it meets the objective of providing housing for people already living in Wyre Forest. A huge expansion in housing on the east side of Kidderminster suggests it is meant to serve people commuting to Birmingham and the Black Country who are likely to travel by car and so contribute to increased traffic and air pollution along the A456. An eastern relief road has already been rejected on more than one occasion, if it were built it would only transport traffic from the bottleneck at Goldness Corner on the A449 slightly more quickly to the bottlenecks in Blakedown and Hagley on the A456. Anyone who has travelled on these roads at peak times will know how bad the traffic is now and a huge expansion in housing will make it worse. A relief road will only move the problem along a little, possibly exporting some of the air pollution into a neighbouring district without solving the overall problem of congestion.</p> <p>The proposed almost doubling in size of the Spennells housing estate would contribute to increased local traffic. Currently there are two exits to the estate and there can be difficulties getting out of the estate in the mornings due to traffic congestion. An increase in housing would make that much worse, and idling cars cause increased air pollution. Most parts of the estate have access to fields with public footpaths that can be used for recreation and exercise helping to combat the problem of obesity that has been identified in the district. Option A these fields will be built on and that amenity will be lost. There are no public footpaths on the fields further out so opportunities to exercise will be removed. The leisure centre is the other side of town and public transport is poor so opportunities for exercise will be greatly reduced for those without a car.</p> <p>There will also be an adverse impact on wildlife that uses Captains pool since the current access to the countryside will be cut off by housing making it hard for wildlife to move from one area to another. Similarly the nature reserve will be cut off and there will no longer be a wildlife corridor between the nature reserve and the countryside. This could have an adverse effect on the</p>

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				<p>viability of breeding populations of wildlife.</p> <p>Although option A is said to enable more effective school provision and provides for free schools at primary level it does not adequately account for the increased need for places at secondary level. The closest secondary school is the split site King Charles I School. Although there may be potential for some expansion of the lower school site on Borrington Road, the upper school site is surrounded by housing and there is no room for further expansion. Under "Building schools for the future" it was planned that the school would be replaced by a new single site school on the Borrington Road site extending into part of the Green Belt. If that land is used for housing it removes the option for expansion of King Charles I School and makes it hard to provide the extra school places required at secondary level.</p> <p>Option A would also have an adverse effect on the Wyre Forest Rural polling district, since all the new houses in the extended Spennells housing district would be within this ward. This would be a large number of suburban Kidderminster households voting on matters affecting rural areas of Stone, Chaddesley Corbett etc and potentially outnumbering those communities so that their views were no longer taken into account.</p>
	LPPO677	Option A	Object	<p>I object to OPTION A.</p> <p>Option A would have a significant, negative impact upon biodiversity and “Green Belt/developed area” - giving the impression of urban sprawl effecting the distinctive identity and attractiveness of the district.</p> <p>Disproportionate focus of additional housing in Kidderminster would add substantial risks to transport, school, amenity requirements in the area- and take away a positive green/environmental outlook and experience forever.</p> <p>The proposal in respect of Heath Lane is impractical and dangerous. Walking along this lane often find having to climb a bank to allow a single lane of cars to pass. Any additional traffic is an</p>

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				<p>accident waiting to happen!</p> <p>If pursue Option A, “natural border” removed between Wyre Forest and Wychavon suggest you consult residents and the government on advantages of merging councils.</p>
	LPP0156	Option A	Object	<p>I object as neither are viable options.</p> <p>Use of Green Belt only justified by proposed eastern relief road, which is only necessary if development proceeds. There is no need for the relief road without the development as traffic can use the A450 from Hagley to Torton.</p>
	LPP0333	Option A	Object	<p>I submit the following objections to OPTION A :</p> <ul style="list-style-type: none"> the land proposed for this Option is agricultural land and has been used for food production during the whole of the time I have lived in my house (32 years) The whole project does not appear to have been well thought out. WFDC is asking residents to submit details of any other sites that they may know about. Surely that is the job of WFDC Planning Dept. In 2016 we had planning permission refused to fell trees behind our house as the proposed works would have “an adverse effect on the amenity of the local area”. If a single house can have such a “damaging” effect then how can WFDC justify building hundreds of houses on the same field? Spennells is already too big.
	LPP0403	Option A	Object	See summary LPP0400.
	LPP0425	Option A	Object	<p>I object to Option A and Option B.</p> <p>Green Belt land should be used only as a VERY LAST RESORT.</p>

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				<p>Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collaborate and collectively review overall brown field site availability and plan housing development accordingly – decisions to build on the Green Belt should not be based on local authority boundaries.</p> <p>The 5 year rolling time frame for construction sites should allow for regular reviews of brown field sites and enable changes to be incorporated into any plan,.</p> <p>The plan fails to recognise changes in shopping habits and unrealistically targets retail expansion and comparison shopping.</p> <p>Kidderminster has suffered from the failure to 'tidy up 'following the migration of Kidderminster town centre to Weavers Wharf and Crossley Retail Park.</p> <p>Retail premises and the courts building have been empty for 8 /9 years - the regeneration of such sites require radical solutions for alternative use that reduce any need to build on the Green Belt.</p> <p>Unnecessary decisions are being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping (indeed, the plan itself demonstrates an inability to predict /understand short term population levels in the District).</p> <p>The plan fails in its stated aim to "to use a robust and up-to-date evidence base to ensure that the local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" . Instead it aims to justify what developers want to deliver rather than meet the needs of Kidderminster residents.</p> <p>Previous attempts to build an Eastern relief road have failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph road following the same route as the existing road from the Worcester Road through Mustow Green to the Birmingham Road - is it</p>

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				<p>really a relief road at all?</p> <p>Whilst constructing a new school in the Spennells area appears attractive this (together with the promise of the 'relief road' shouldn't be the determining factor when opting to build on the Green Belt – other options should be sought.</p> <p>Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years. This situation equally relates to the areas covered by the LEPs identified in the plan.</p> <p>Whilst economic development in Kidderminster will be welcome - past experience shows this will take time – in the meantime people will continue to travel.</p> <p>Immediate need is for fresh radical thinking that optimises the use of brown field sites throughout the LEP areas for residential use and enables Kidderminster itself to become a modern, contained and attractive town centre that incorporates retail leisure and residential opportunities rather than pursue outdated models from the past - 'mixed use' communicates little other than the elements of 'wishful thinking' so often reported in the local press over numerous years.</p>
	LPPO486	Option A	Object	I object to Option A
	LPPO3142	Option A	Object	<p>I would like to raise my deep concerns regarding the proposed housing development Option A under the local plan review. I think such a large scale development would be extremely detrimental to the physical and mental health of existing and new residents for a number of reasons:</p> <ul style="list-style-type: none"> • The loss of access to valuable Green Belt areas that enrich the lives of all residents • The rise in air pollution from increased traffic • The increased everyday stress from an already congested area

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				<ul style="list-style-type: none"> The lack of essential amenities (including school and doctor surgery places) to accommodate such a growth in population <p>I am hopeful that the Council, elected to represent the needs of their constituents, will take these concerns into consideration</p>
	LPPO3059	Option A	Object	I do not support Option A. The land behind Offmore is considerably higher than other development and would be very visible. Schools in the area are already full it would be nice to be a sustainable community and not just fields of houses.
	LPPO3068	Option A	Object	<p>Having viewed the report and considered the alternatives, I favour the proposals put forward in Option B and object to option A for the following reasons:</p> <ul style="list-style-type: none"> The area's population is almost static and it seems that the council's estimation of the number of new homes needed is too high, meaning that there is room to accommodate the needed homes without using the additional Green Belt land included in Option A. If an extra 2% of Wyre Forest's Green Belt is made available to developers it will, in all probability, be used for housing while brownfield sites/derelict buildings, forming a blight zone around the town centre, will be allowed to remain undeveloped. Development of brownfield sites and derelict buildings in and around the town centre would help to rejuvenate the town. If the expanded Lea Castle site were used to its full potential then many of the needed homes could be accommodated there along with the necessary infrastructure (school, local shops etc) Development of this site would not put further pressure upon the already busy, Bromsgrove and Worcester roads. An Eastern bypass/link road, joining the Worcester road, Bromsgrove road and Birmingham road would not alleviate traffic congestion and would cause air and noise pollution within in a residential area. Mental health and welfare is an increasing issue in this country and it is proven that green space and fresh air and exercise are hugely beneficial in combating mental health issues such as anxiety and depression. How can the removal of an area like this be

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				<p>justified?</p> <ul style="list-style-type: none"> The fields to the East of Spennells are of high quality agricultural land and should continue to be used for food production. The fields provide valuable habitat for wildlife. <p>I object to the proposals put forward in Option A and favour Option B.</p>
	LPPO3181	Option A	Object	<p>In principle objection to loss of Green Belt sites.</p> <p>Concern at expansion and sprawl of Kidderminster eastwards around Hodge Hill area.</p> <p>Inadequate infrastructure to support housing and employment uses/development near Hodge Hill on A456, Hurcott Lane and Husum Way junctions.</p> <p>Concern at lack of infrastructure detail in the plan for the Core and Option Sites to East of Kidderminster.</p> <p>Such development will put undue strain on the existing rural road network with drivers using lanes as rat runs to connect to the A456 and onwards to M5 and A38.</p> <p>In particular Hurcott Lane, Perryford Lane, Rocky/Stakenbridge Lane, Churchill Lane, Wagon Lane, and also south of A456 including Belbroughton Road.</p> <p>Concern at any effect on Hurcott Pool – SSSI – and watercourse network.</p>
	LPPO3195	Option A	Object	<p>The sustainability report suggests local employment to support the additional 1700 homes will be available from the businesses on the Worcester Road and Hartlebury Trading Estate. I do not believe these will expand to support the potential numbers involved.</p> <p>The resulting additional vehicles will have to get on to one of the already congested B roads</p>

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				<p>around Kidderminster. As the new by-pass to Stourport has resulted in major congestion. It is currently very difficult to get out of Wilden Lane at most times of the day and almost dangerous when it gets near rush hour.</p> <p>Surely 'Option A' which disperses the additional homes around the area would be the most beneficial for congestion and general facilities.</p>
	LPPO5112	Option A	Object	Option A would use valuable Green Belt agricultural land surrounding the Spennells estate, which is currently in production.
	LPPO5123	Option A	Object	I object to the parts of the Core plan and Option A.
	LPPO5141	Option A	Object	I do not support Option A for all the above reasons but particularly because of the larger Green Belt land take, scale and concentration of development and the negative impact upon local amenity, biodiversity, health and wellbeing and, most importantly, community identity.
	LPPO4839	Option A	Object	<p>Part of Option A (Spennells) has been shown to be unacceptable mainly on the grounds of storm and foul water drainage and flooding issues. Also other constraints, issues and discrepancies relating to the consultants reports. In my view the development here would have a serious impact on Urban Sprawl.</p> <p>I have questioned whether the Eastern Relief Road would do anything other transfer stress to other pinch points on the existing highway network. I can't see how it would improve town centre congestion other than where perhaps the A449 passes through the Horsefair. A traffic modelling analysis may be helpful here but it is not evident that one has taken place. Therefore I cannot see how subjective and unproven benefits would outweigh admitted disadvantages. These disadvantages I believe I have shown to be far more serious than anything shown in the Options Review.</p>
	LPPO4651	Option A	Object	The benefits of Option A do not outweigh the disadvantage caused by the large-scale of expansion to the east of Kidderminster that would be necessary.

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				<p>Objections to Option A on Planning grounds:</p> <ul style="list-style-type: none"> • The ‘beauty of the countryside’ has been cited in the plan as an important criterion but has not been given sufficient consideration in Option A. See Annex 1 below for detail. • Option A proposes building on Green Belt land which can happen only in exceptional circumstances which have not been demonstrated). See Annex 2 below for detail. • The plan has not adequately demonstrated the need for 5,400 new dwellings <u>specifically</u> on Green Belt land. The correlation between the population and the years considered (2001 to 2015) explains less than 5% of the variation (Pearson method). See Annex 3 below for detail. • The development of farming land is permitted <u>only</u> if unavoidable. Option A contains well managed farmland with no justification presented for its loss. See Annex 4 below for detail. • Option A will remove important wildlife corridors which connect sites of special scientific interest and nature reserves. See Annex 5 below for detail. • There is a lack of adequate road capacity and infrastructure for an expansion of the Spennells with no real prospect of the infrastructure being developed. See Annex 6 below for detail. <p>Annexes</p> <p>Annex 1; Sections 5aiii, 11.1, 11.2 and, 23.1 respectively set out the importance of;</p> <ul style="list-style-type: none"> • access to facilities for those without cars; • recognising the intrinsic character and beauty; • protection and enhancement of the natural environment and • Promoting activities such as walking and cycling. <p>Around 3,000 houses are within easy walking of the fields; providing access to the countryside to many as a healthy, leisure pursuit. However, the LCA cited states that account has not been</p>

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				<p>taken of scenic beauty. I have added a few pictures that could not be taken following Option A’.</p> <p>Annex 2; Option A proposes building on Green Belt. The Government recommends, ‘maintaining strong protections’, and clarifies that, ‘Green Belt boundaries should be amended only in exceptional circumstances and where <u>all</u> other reasonable options have been examined’. Policy 6B commits to ‘encouraging the effective use and re-use of acceptable brownfield land, safeguarding and enhancing the open countryside. I recognise that <u>some</u> residents <i>think</i> that Green Belt is a landscape protection tool, but very little commitment to policy 6B or of other options being ‘fully examined’ has been presented.</p> <p>Annex 3; The ‘reasoned justification’ outlined is predicated on ‘unusual demand’. However, Figure 3.1 is extremely misleading. The trend to 2034 which predicts 5,400 dwellings appears to have been based on the population figures which explain less than 5% of the total variation (Pearson method). The poor correlation is evident by scrutinising Figure 3.1 from 2001 to 2015. The study does an excellent job of teasing out other factors affecting population such as the age demographic, economic factors, international and national migration and even tries to take account of Brexit, but since the conclusion is that these factors play a minor role on population change the predictive method used remains crucial and is erroneous. The increase from 2001 to 2015 has been 2.7% <u>in total</u> and Table 2.0.1 suggests static population growth. Despite the Council’s best efforts to encourage job growth, for which we are all grateful, the carpet industry continues to decline, so maintaining the number of jobs would be an outstanding outcome. In section 2.4, it is acknowledged that the carpet industry in Kidderminster (population 56,185 in 2015) has been in decline since 1970s. Furthermore, there are numerous examples of construction and development companies holding property with planning permission around the Wyre Forest. If there were high demand, work would start today to convert their land assets into profit. There is clearly little latent demand in the system. The plan looks forward 20 years, but surely the demand needs to be demonstrated <u>now</u> in order to release Green Belt?</p> <p>The Government suggests the established method of calculation is ‘particularly complex and lacks transparency’; recommending a new, standard formula. Given the intrinsic character and</p>

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				<p>natural beauty of the targeted Green Belt and the poor correlation of existing data, we must await the proposed standard method for calculation <u>before</u> giving planning consent. Delaying planning permission to build on Green Belt, pending improved forecasts of the need for new dwellings is surely a minimum legal requirement? Section 6.12 states that, ‘much of the readily available brownfield land has now been developed’. I am aware of brownfield sites and abandoned properties in the area that have not been developed. Surely, the minimum requirement before building on Green Belt is a survey of <u>all</u> brownfield sites in the Wyre Forest, providing a comprehensive list identifying the ownership and status of that land and an action plan to build on it.</p> <p>Annex 4; With respect to sustainability, the local plan suggests safeguarding agricultural land. However, the Amec review is misleading, describing the character as having ‘average quality’ when the pictures here demonstrate it is high quality. The review describes the withdrawal of active land management through poor crop growth. It would be easy to understand land management withdrawal given the speculation over the future of the land and its ownership (now by a development company), precluding a coherent long-term farming plan. The position has been exacerbated by the 2007 outbreak of foot and mouth in the locality, forcing local farmers to move away and reducing demand from local fields for animal feed. In practice however, the reverse is true. My photos show healthy crops, demonstrating that local farmers value the opportunity to rent from the developer to farm! Recently, crops including wheat, barley, carrots, spring onions, potatoes etc, have been grown as well as occasionally encouraging pollination by use of poppy and other wild flowers. My knowledge of the fields covers 30 years. Section 7.9 explains that the ‘Amec’ studies formed a key part of the evidence base for policy options and decisions. Has testimony been sought from any of the farmers that have farmed there? Section 6 outlines the importance of promoting local food production. This has even greater importance post-Brexit. Greater attention is being paid to the number of miles travelled by food and the contribution this makes to global warming. The region can ill afford the loss of agricultural land.</p> <p>Annex 5; A 2014 Government press release outlined the importance of wildlife corridors. The</p>

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				<p>area is blessed with sites of special scientific interest (e.g. Wilden Marsh) and nature reserves (Spennells Valley Local Nature Reserve). Numerous rare species would benefit from the use of natural hedgerows and open fields to provide a varied habitat and a corridor to extend their range.</p> <p>Annex 6; Everyone understands the difficult choices Councils make when balancing infrastructure spend against other pressing needs in times of austerity. We were led to believe that the residential housing on Hawfinch Rise would be reserved to provide extra space for the much-needed expansion of the school. The reality is that development of the fields with the inevitable failure to provide the required infrastructure will produce a nightmare scenario for the new residents in terms of traffic congestion and facilities.</p> <p>I understand that the Council wrestles with conflicting needs on a tight budget, but the level of justification required before building, especially on Green Belt needs to be addressed urgently and much more rigorously.</p>
	LPP04737	Option A	Object	<p>Do I prefer Option A or B? The immediate answer is neither. The amount of land taken up by these two proposals especially the core sites is too extreme. The amount of additional infrastructure required for schools, health facilities etc. looks from this perspective to be too costly and will never be completed. Where are these additional schools or Form Entry (not sure what this means) to be built within this new development without compromising all the other factors such as green infrastructure, transport, water and sewage etc? What about the unique place and all the other considerations?</p>
	LPP04594	Option A	Object	<p>The impact on the Green Belt and the size of the proposed “Super Estate” is huge. For anyone who knows the area, in particular the existing Spennells estate, you will appreciate how big this proposed development is.</p>
	LPP04331	Option A	Object	<p>Option A infers the inclusion of an Eastern Relief road; I believe that this is being used as a dangling carrot to encourage people to support this option. There is no evidence that in reality the relief road is any more likely to happen with this option. Section 106 moneys will be used to</p>

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				ensure affordable housing (which they should) within said scheme, there will not be any left for relief roads.
	LPP04632	Option A	Object	<p>I have tried to read and absorb the contents of the document and have only being partially successful. What I have seen is a looming disaster for quality of life in this beautiful area. The plan is some kind of a patch to a problem that should be fixed at source. In allowing unchecked immigration, successive governments have caused this country to become massively overpopulated and as a consequence, ordinary people are having to endure constant development, loss of open spaces and food production areas (needed all the more with the ever increasing population) and more and more traffic congestion and its attendant pollution, which in turn require more roads and bypasses to be built. The problem must be addressed at source by national government who should be severely pressured by local authorities on residents' behalf.</p> <p>As for the plans themselves, there are too many individual components to be able to comment on them all. If I had to express an opinion, then I would say that option A is not my preferred option, but that is not to say that the other option is acceptable either - it is just the lesser of two evils.</p> <p>I realise that the production of this plan has been imposed by national government, but I implore the local council to act now in resisting the move to just keep building in an attempt to solve a problem that could easily be fixed at source, i.e. stop adding to the problem of an already overpopulated and overcrowded island immediately.</p>
	LPP04301	Option A	Object	The Local Plan Review document is flawed and biased towards Option A. The options only provide two sites whereby additional schools would be assured. The redevelopment of Kidderminster train station is questionable. The Capital Portfolio Fund and the £10 million Development Loan does not go hand in hand with proposed Option A, or any agreement for Kidderminster to take any overspill from Birmingham. The proposed Option A will just provide a

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				<p>commuter estate and therefore secure the Bypass.</p> <p>The downgrading of Kidderminster Hospital is just one example of how the town amenities are not suitable for the existing residents let alone any newcomers.</p> <p>Option A will bring a commuter estate encouraging people to work and spend outside of Kidderminster when in fact the local economy needs a boost.</p>
	LPP04377	Option A	Object	I am strongly opposed to the Options suggested. The district Council is not trying hard enough to use the brownfield sites that are available.
	LPP04436	Option A	Object	<p>I am writing to express my objections to the local plan review preferred options consultation.</p> <p>They are as follows-</p> <ul style="list-style-type: none"> The Councils own statistics show that there are enough brown fields/other capability to fulfil government targets for ten more years. The proposal is for five years (beginning in 2019 will run until seven years from now), and as such no release of Green Belt land will be necessary during this period- “The Green Belt is 13% of the land. We can solve this crisis without having to take huge tracts out of the Green Belt,” the housing minister, Gavin Barwell, said. “They can take land out of the Green Belt in exceptional circumstances but they should have looked at every other alternative first,” he said, including building on brownfield land, releasing surplus government land, increasing the density of projects in towns and cities, or partnering with neighbouring Councils. Whilst I appreciate that there are difficulties in attracting building companies to build upon more difficult sites, allowing the release of more lucrative ‘easier option’ sites will only exacerbate this problem. It may be argued that the Council can negotiate a ‘tie in’ for companies to build upon brownfield/other sites alongside ‘easier’ options, they will then be able to pay a levy to the Council rather than completing these obligations. The Council will not, however, be obliged to spend these resources in Kidderminster/to

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				<p>improve local housing stock that utilises brownfield/other sites.</p> <ul style="list-style-type: none"> The preferred option A removes more than twice the amount of Green Belt from our local area than option B (2% as opposed to the Government’s nation benchmark of 1%). This option is purported to allow for new road networks and supporting, but as no information is available, it must be assumed that this is a desire rather than an absolute fact. If one of the two options is to be adopted then option B is the most appropriate, as it will simply extend an already existing new development area with its own direct transport links to both the Wolverhampton and Stourbridge main roads. In light of the above points my vote as a constituent of this area is that- Firstly, that both plans A and B are unnecessary and unacceptable, but that secondly IF one must be adopted, then it should be plan B.
	LPP04445	Option A	Object	<p>Please note my objections to both Option A and Option B of the Local Plan Preferred options.</p> <p>I don't think it's fair to offer a Plan A and B which both involve destroying our local Green Belt which is so close to many of our residents' hearts. Green space is important for emotional and physical wellbeing. As a nation, we grow less than two-thirds of our own food. Now, more than ever, we need to avoid unnecessarily losing our countryside. Why can't we utilise our brownfield land instead of destroying our precious countryside, which is home to rare and endangered wildlife like the Corn Bunting, Long-eared Bat and a Horseshoe Bat.</p> <p>I have lived in Kidderminster many years and have always valued the local Green Belt. It played a huge part in my childhood wellbeing and I have very fond memories of going on nature walks with my family and playing with my friends. Our Green spaces should be protected as once they are gone they are gone for good.</p> <ul style="list-style-type: none"> Green spaces and farmland are important habitats for wildlife, some species of which are rare/endangered i.e. the Corn Bunting. In our efforts to tackle the housing crisis, suitable brownfield land and not Green Belt

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				<p>should be the priority. This should be utilised first and foremost, before any Green Belt land is even touched. What about the derelict and vandalised Sion Hill school site? There are places like this all over which have not been utilised after about a decade and yet you propose to destroy our Green Belt.</p> <ul style="list-style-type: none"> • The amount of housing you propose to build is completely unnecessary and based on figures that apply to our nation as a whole and not the local area's needs. You have also rounded figures up. This is completely unacceptable and one can only assume this has been done to make money first and foremost, and not with the wellbeing of our local people in mind. • Our local government has only closed schools over the years and you now want to move thousands more people into our town. Where will they go to school? Where will they go to the doctors, or the hospital? How will our Police and Fire services cope with the increase? There already aren't enough GPs for the town's population and it's already difficult enough to get a doctor's appointment. Kidderminster Hospital has been downgraded. • I don't feel that this proposal has been purposely kept quiet- I only found out about it from a family member who had a leaflet through her door. I didn't have any warning whatsoever and neither did several other people I know. I also believe it has been designed in a way as to pit 2 parts of our town against each other, with one side hoping you will use Option A and the other wanting Option B with no option available to people who don't want any Green Belt used. Is this not an option? • Houses on the Silverwoods development remain unsold; why is there now a need for such massive development when there appears to be insufficient demand already? This huge building project was supposed to solve Kidderminster's housing needs for the foreseeable future. Once again this contradicts decisions made by the Planners. Was the mistake then or now? • There aren't enough jobs in the area to support this huge influx of people. This will render new developments commuter ghost towns and increase traffic on main roads. <p>To summarise, I do not agree with Plan A or Plan B. I believe there is no need for such urban</p>

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				expansion.
	LPP04452	Option A	Object	<p>In the draft plan there are aspirations to redress the imbalance in the age of the population, attract more business and jobs. Destroying the Green Belt to build houses does nothing to address these aspects of Kidderminster’s future. The idea that almost 6000 houses are required when clearly the population of Kidderminster is not growing at a significant rate seems like a grossly inflated figure. The 2.7% increase in the last two years is almost certainly the effect of increased immigration from Europe, which may reduce as some return to their own countries following Brexit.</p> <p>Average age and jobs: To lower the average age of the population it is necessary to attract young people to the town for which you need jobs and cheap housing. In fact the biggest problem facing youngsters today throughout the UK is that they can’t afford to get on the housing ladder. Just building new houses on Green Belt land will not help. A potential solution to the housing problem would be to have the derelict and unoccupied properties, of which there are many, in the town converted to flats. This may require the use of compulsory purchase orders, which must be within the power of the Council. The resultant dwellings, would be cheaper to buy or rent, would attract young people and would help to revive the town centre. The proposed use of the Glades site for retail should be changed to more flats for the same reason. Cheap housing will not be found on Spennells Green Belt. Young people will be the people to develop new businesses; older people with established careers will be reluctant to take risks.</p> <p>Green Belt effect: Building houses on green field sites to the east of Kidderminster could have an adverse effect on the average age of the population. Any developer building on that land will want to build 4 & 5 bed houses not only to increase his revenue but also to recover the cost of the land he has purchased. They will not want to provide affordable housing at the 30% level. This will attract commuters from Birmingham and Worcester. And will exacerbate the commuting problem.</p> <p>My objection: I am strongly opposed to both of your preferred options. I believe that developing</p>

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				cheap flats for younger people will balance the ageing problem and help to create new businesses. I believe that to meet the need for affordable housing all brownfield sites in the town should be redeveloped first. No Green Belt land should be built on until the redevelopment of the town centre has been completed and all flats occupied.
	LPPO3215	Option A	Object	<p>I would like to highlight my objection to WFDCs plan to sacrifice large swathes of Green Belt land around Kidderminster for housing development and support neither option A or B. The reason for this being that I believe population growth within the region is static due to a reduction in job opportunities in the area.</p> <p>The Green Belt land around Kidderminster is easily accessed by local people and is well used by all members of the community providing a safe space to exercise both the mind and body. The loss of such land will in addition have a detrimental effect on wildlife with many protected species such as corn buntings, bats, badgers and many other bird species using this land.</p> <p>If following the use of all brownfield sites there is a true unmet need in the district for housing I would support the integration of small developments of less than 100 houses to be spread across the district on a variety of Green Belt areas so as to reduce the pressure on local infrastructure and services. In addition these areas should be carefully considered to see how they link in to existing public transport methods with the potential for a new park and ride train station to be developed outside of the town.</p>
	LPPO3218	Option A	Object	<p>I opposes Option A:</p> <ul style="list-style-type: none"> • The plan proposes two thirds to three quarters of development centre on Kidderminster and land surrounding it. I consider this to be unfair and disproportionate and there needs to be some choice as to where people can live to encourage more people to stay in the Wyre Forest. • The proposed development is 3 to 4 miles away from the town centre, which has no transport links after 6 pm and will create more traffic getting into the town and out of

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				<p>the already congested estate roads around Spennells.</p> <ul style="list-style-type: none"> • Kidderminster town centre is very run down. People do not want to live in big soulless estates or shop in the town centre here, but would rather live in the more vibrant and social areas of Stourport, Bewdley and Cookley etc. • The shaping of Option A to justify the relief road to resolve pre-existing transport problems and air quality is not correct. The relief road will not help with air quality in the Horsefair as the majority of traffic to Birmingham from Worcester use the A450 Worcester Road, which should be enhanced and the Bridge raised to accommodate the larger vehicles instead of creating a very expensive and unneeded additional road basically running parallel to this. • I challenge the validity of the Green Belt Review and the consequences this has, in respect of Option A for the fields between Spennells and Summerfield. These fields have a massive impact upon social amenity, biodiversity and the integrity and identity of the hamlets of Summerfield and Stone. There are many rare bird and mammal species in these fields (e.g. Bats, Badgers, Linnets and Corn Buntings), and are used regularly for exercise and health and wellbeing by residents, as well as visitors to the local area.
	LPPO3263	Option A	Object	<p>I object to A proposals as you are putting forward an option to build on prime farming land, which has very diverse wildlife on it, (including protected species such as bats, badgers and great crested newts). Also concentrating too many houses on the east of Kidderminster, overwhelming the existing communities which could cause social problems further down the line.</p> <p>The schools and Doctors to the east of Kidderminster are already at capacity.</p>
	LPPO3274	Option A	Object	I object to plan A and “Core sites”.
	LPPO3371	Option A	Object	<ul style="list-style-type: none"> • Objects to option A - prefers option B. • Consultants are incorrect stating there is no significant wildlife interest in Spennells fields - they are habitats to many animals. • Option B would not endanger these habitats.

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				<ul style="list-style-type: none"> Option B spreads smaller, more desirable development throughout Wyre Forest. Local infrastructure demands will be best served in option B - especially schooling, transport and public transport as it will be spread around the district. Stone parish is unfairly targeted in option A for housing and a relief road. Option A does not address the need for affordable homes as prices will be too high for local residents as it's a low income area. The loss of Green Belt, arable land and hedgerows should not be focused on one main area - option B uses less Green Belt. The draft plan is in support of option A as it will provide fund to the relief road - the need for which has no evidence.
	LPPO3408	Option A	Object	<ul style="list-style-type: none"> Prefers option B over option A. Green Belt land should only be used as a last resort. Disconnect between plans and town centre regeneration/transport infrastructure. The Glades used to be in walking distance but now they aren't - these plans will repeat the decision causing more cars on the road.
	LPPO3420	Option A	Object	<ol style="list-style-type: none"> Increased traffic, noise and pollution from exhaust fumes with resulting affect on existing resident's health. Removal of Green Belt amenity currently used by existing residents for walking, cycling, dog walking or horse riding. Increased pressure on local services - schools. GPs and hospital. It is currently impossible to get an appointment at Church Street GP practice. Loss of wildlife habitat. Loss of productive agricultural land. Wyre Forest has an ageing population who do not require thousands of starter homes built for commuters. Commuters parking in neighbouring streets to the railway, rather than paying for car parking, are already a nuisance. Roads are already grid locked. Farfield is as a result of all

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				day commuter car parking a one way road.
	LPPO3564	Option A	Object	<p>I drive around Kidderminster and see so many derelict areas and unused building, I cannot comprehend how using Green Belt is appropriate. Should we not be using brownfield sites, derelict buildings etc there are enough factories in Kidderminster or is this too expensive for the developers and they are looking for a cheaper option?</p> <p>We have to protect our Green Belt as concerns over increasing mental health are on the news every day. Our schools are full, we will have even more traffic even with a relief road, additional pollution, increased pressure on doctors and NHS and urban sprawl.</p> <p>The fields on Stanklyn are a haven for wildlife – I go there at 6am for a walk – the swallows are flying over the top of the grasses and I can hear skylarks – it is heavenly – what will happen to their habitat - are we trying to create a horrendous urban sprawl.</p>
	LPPO3573	Spennells	Object	<p>In Option A it is suggested that around 1700 dwellings be built. This is far in excess of the actual growth of the local population, which has remained relatively stable since 1991. Recent job losses suggest there is unlikely to be large demand for new dwellings.</p> <p>Option A will take out valuable, much needed, agricultural land if around 1700 dwellings are built on it. This will lead to less productive land being available to Britain. Wildlife habitat will also be lost when the hedgerows are taken out. The common toad, whose numbers are declining rapidly, will lose its migration routes around the Spennells Valley Nature Reserve.</p> <p>Option A would put great pressure on the existing busy roads. The future 3700 residents are unlikely to be helped by an Eastern Relief Road. Spennells Valley Road links the A449 and the A448 and an increased volume of traffic would result in an even slower flow at peak times, leading to increased pollution.</p>

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				<p>Schools: These have only a very limited number of places which only possibly might still exist for new residents' children.</p> <p>Spennells community centre no longer exists as it was all that was available for the school to expand to furnish places for the existing pupils on Spennells.</p> <p>Spennells estate no longer has a community centre. This means there is nowhere for existing residents to meet or pursue leisure activities.</p> <p>Shops: These are next to the school. There are five "shops" and two takeaways on Spennells. The volume of traffic and difficulties in parking around these and the school at peak times are already great. Pollution levels will be greatly increased with 1700 more dwellings. Do we want increased pollution around our schools?</p>
	LPPO3588	Option A	Object	<ol style="list-style-type: none"> 1) The lack of concentration on potential Brown Field Sites rather than the easy option of allowing building on Green Belt. 2) You have already identified such Brown Field Sites in your report "Wyre Forest District Strategic Housing and Economic Land Availability Assessment 2016" 3) It is pleasing that areas such as the old Lea Castle Hospital have been identified and these surely are areas to use first for house building. 4) There is no concentration or even identified concern that sites where building permission has been granted are being left and no movement has yet been made to build on such sites, viz:- the land adjacent to the new Tesco in Stourport. 5) This loss of Green Belt land is very worrying especially due to the impending Brexit situation. We are already only 50% self sufficient with food production in England and a continued loss of good agricultural land, which is that backing onto Spennells, could have serious repercussions for our food production. Once the land is built upon, the situation could not be reversed.

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	LPP03593	Option A	Object	<ul style="list-style-type: none"> • Objects to option A. • Would have negative impact on local area. • Would affect local environment and wildlife. • Increase traffic congestion and risks. • Diminishes the identity of Summerfield and Kidderminster - creates urban sprawl. • Have we used all available brownfield sites across the district? • Selected easier solutions for developers. • The council needs to re-examine options to establish a more balanced plan to protect its distinct and attractive identity for further generations.
	LPP03664	Option A	Object	<p>OPTION A is opposed and <u>preference is for OPTION B</u> for the following reasons:</p> <ul style="list-style-type: none"> • The housing need outlined is incorrect • You have not provided enough evidence for transport support. The proposed Eastern By pass is not proposed in enough detail in the plan. There are no maps, volume of traffic proposed, entry or exit zones. • If Option A is chosen, there will be negative impact on: <ul style="list-style-type: none"> ○ Health ○ Well being ○ Mental Health ○ Safety ○ Road ; congestion ○ Distinctiveness , region characteristics ○ Transport ○ Crime, social behaviour ○ Wildlife ○ Schools ○ Medical centres, Doctors hospitals. • Councillor Ian Hardiman confirmed that the Council had brownfield sites for 3000

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				<p>dwelling so use of Green Belt should be a last resort.</p> <p>The benefits of allowing easier delivery of school provision and the option of an Eastern Relief Road do not outweigh the disadvantage caused by the large-scale of expansion to the east of Kidderminster that would be needed.</p> <p>Option A:</p> <ul style="list-style-type: none"> • Will not provide the employment need as this will make Kidderminster a soulless commuter town. • Will produce a housing sprawl and will not generate growth to Kidderminster. One town will merge into another. • Current employment land lies vacant and unused on Worcester road since built what evidence is there that more is required and that it will be filled? • Infrastructure: The by-pass will not add any growth to Kidderminster and will serve as a route to by-pass the town. The eastern by pass will be opposed as it was previously. What evidence is there that this road will enhance the community? Where will the Eastern by pass end? Presume on A456 where this will add to already heavy congestion. It will cause congestion, traffic, health and asthma problems, and destroy much more than green field and Green Belt sites. <p>You have not mentioned development to secondary schools.</p>
	LPPO3780	Option A	Object	Option A unacceptable.
	LPPO3795	Option A	Object	<p><u>OBJECTION TO ‘OPTION A’ AND REMOVAL OF LAND FROM GREEN BELT STATUS</u></p> <p>Offering A or Option B is a divisive and dangerous tactic — one that splits communities and gives way to resentment. Who am I to say that the Green Belt in Kidderminster is more important than the Green Belt in Stourport? If the projected growth figures are accurately calculated it will be</p>

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				unnecessary to develop on any Green Belt land. If WFDC harnessed the passion raised by this consultation and worked with residents then maybe we may achieve something lasting and worthwhile.
	LPPO3802	Option A	Object	I object to the Council's strategy as evidence/analysis shows the scale is unnecessary. I do not support Option A inc the Kidderminster Eastern Relief Road which, if built, would bypass the town centre and worsen traffic problems along the A449
	LPPO4147	Option A	Object	I do not agree with any option that builds on Green Belt.
	LPPO4156	Option A	Object	<p>I do not support options A. I would urge you to consider the requirements of local residents, rather than those of large developers in this plan.</p> <p>As well as the implications of destroying the local countryside, which is well used and loved by the local community. Have a look at brownfield sites first.</p> <p>The Kidderminster Eastern relief road appears to take traffic from one busy road and feed it into another!</p> <p>A wider-scale review of the traffic round the Kidderminster area is needed, not merely an additional road.</p>
	LPPO4230	Option A	Object	OPTION A IS NOT AN OPTION FOR ME ,
	LPPO2357	Option A	Support	<p>Support Option A.</p> <p>Additional housing requires more investment in infrastructure/employment/communication links and new housing to the north and east of Kidderminster could attract businesses.</p> <p>Housing west of the River Severn, with no additional road improvements, will increase traffic congestion/pollution/air quality in Stourport/Bewdley.</p>

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	LPPO2612	Option A	Support	We wholeheartedly support the councils preferred option A, because building the majority of the houses on the Spennells and Lea Castle would be the most attractive for those people who choose to live in the Wyre Forest but their employment is within the surrounding towns and cities.
	LPPO2614	Option A	Support	I attended the consultation meeting at Areley Kings Village Hall last Wednesday and this is my response. I am totally in favour of option A for the new housing. Your development plan states that you want to develop the role of Kidderminster as the main town for the area. In that case large areas of new residential development should take place there, particularly as a new Eastern Relief road is being proposed which would benefit everyone in the Wyre Forest. It would help to relieve the congestion within central Kidderminster and be convenient for residents on the new estate who commute to Birmingham and the Black Country. Also new schools are proposed for the extension to the Spennells estate. This must be more advantageous than trying to expand multiple schools across Wyre Forest if the residential development is widely dispersed.
	LPPO2768	Option A	Support	Option A preferable.
	LPPO2955	Option A	Support	It seems that Option A would include new infrastructure whereas Option B will not include any.
	LPPO2968	Option A	Support	The current and planned infrastructure in Kidderminster is more suited to the housing increase. The development would complement the recent improvements such as the town centre as well as the planned eastern gateway. The road system in Stourport struggles currently so an increase in traffic would not be helpful to the town itself or the residents.
	LPPO2995	Option A	Support	In general I am in support of Option A. I am in favour of keeping new homes near to potential employment site, schools and services whenever possible to reduce the travelling and pollution. Concentrating new housing will make it easier to provide new schools places, health services and

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				leisure activities. The advantage of, and benefits from, constructing a link road to the east of Kidderminster, is self evident.
Stourport on Severn Town Council	LPP01257	Option A	Support	<p>The Council met on 1st August 2017 and wishes for Wyre Forest District Council to proceed with Option A and not Option B.</p> <p>Option B does not provide for any highway or other infrastructure improvements within and around Stourport. Option A proposes a new road which would link the A449 with the A448 which would provide new infrastructure to support the proposed new development around the Spennells Estate.</p>
Stourport on Severn Civic Society	LPP01298	Option A	Support	<p>Overall we prefer Option A as we feel the existing and proposed infrastructure will support development on the scale proposed.</p> <p>Kidderminster is already on the national rail network with access to Birmingham and beyond. The proposed Eastern Bypass will facilitate road traffic in the area- locally and beyond.</p> <p>Stourport High School is at full capacity whereas there is capacity within Kidderminster High Schools.</p>
	LPP01661	Option A	Support	I wish to support option A as it is logical from a geographic point of view, would support the proposed by pass and would be straightforward in delivering County and District services.
	LPP01662	Option A	Support	<p>I would like to offer my support for option A. it makes so much more sense than option B because it will come with inbuilt infrastructure and a bypass road to avoid the town centre.</p> <p>Option B spreads out the houses and therefore puts the strain on local services such as schools and doctors. Placing 600 houses on the Areley Kings side of Stourport would create gridlock on the bridge over the river Severn, and the town centre,</p> <p>Option A is the only way forward.</p>

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Wyre Forest Community Housing	LPP01681	Option A	Support	We are in favour of the delivery of more homes and particularly more affordable homes in the District. Having considered the District Council's Local Plan Review Document, we do agree with your assertion that larger scale sites are more likely to enable the viable provision of affordable housing. Therefore, we support Option A.
	LPP01765	Option A	Support	Option A Support-Better suited road system.
Rock Parish Council	LPP01161	Option A	Support	Rock Parish Council supports Option A.
	LPP0595	Option A	Support	I prefer option A
	LPP0676	Option A	Support	I prefer option A as more flexible and would allow the Eastern Relief Road. With all consultations much is unknown and needs a developer to implement it. Apart from Sugar beet factory seen little action e.g. Bromsgrove Street, Sladen School Site, Horsefair, Improvements between Town Centre & Railway Station.
	LPP0757	Option A	Support	Option A would be preferable as it would allow for desperately needed Eastern Relief Road for Kidderminster.
	LPP0131	Option A	Support	Broadly support Plan A as less dispersed, makes use of some existing infrastructure e.g. Lea Castle site, larger development could more cost effectively support its own services; shops, health etc. Concerns about traffic access from this area to Birmingham Road and people using Hurcott Lane which is narrow and already a rat run. Without mitigating routes this could cause problems.
	LPP0174	Option A	Support	I support the Kidderminster Relief road, and development to the East of Kidderminster.
	LPP0337	Option A	Support	I prefer Plan A as this area already has services i.e. medical centre, schools, roads. Plan B in

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				Stourport does not have sufficient roads, medical centre or schools to cope with another 1,000 houses approx. Dunley Road already has traffic queuing. The bus service is awful. Also we have no leisure centre as it has gone to Kidderminster.
	LPP03098	Option A	Support	Apart from the 'Land off Highclere site (BR/BE/6)', I am in favour of Option A.
	LPP03079	Option A	Support	The Parish Council of Kidderminster Foreign wish to generally give support to option A to enable the creation of an Eastern relief road for Kidderminster.
	LPP03179	Option A	Support	I would support Option A in the light of the benefits and the less negative effects on education etc.
	LPP04659	Option A	Support	Given that there are two preferred options, it would, in my opinion, be best suited to develop the sites at Option A areas within the Lea Castle/ Spennells/ Stanklyn areas of Kidderminster. Although this option does mean developing on a slightly higher % of Green Belt land, it does mean that development is contained within one area and road networks and infrastructure are already viable and the impact of such developments on the infrastructure would be minimal. Similarly, proposals to build facilities, such as schools and medical centres, specifically for the development would be a much better investment of public money than trying to ensure small, already established schools can cope with the demand of housing developments being built around them. Overall the impact of the building of larger developments is lower as the building works are confined to one location.
	LPP04596	Option A	Support	The obvious option is the East of Kidderminster Sustainable Urban Extension with the very important and essential benefits that an Eastern Relief Road for Kidderminster would bring for the whole of Wyre Forest. With the financial incentives available from the developers who develop these sites, it surely makes sense to concentrate them all in one area, where the incentives are large enough to make a difference, i.e. new schools, road improvement and community facilities rather than spread them throughout the District, thereby diluting the effectiveness of these financial incentives.

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	LPP04629	Option A	Support	I realise that a plan is required and putting it into action may take years. Firstly I would like to say that in general terms I would support the core housing sites to the east of Kidderminster together with the option A housing sites. These seem to have been considered more thoroughly in that it provides for education and other community facilities along with a relief road to provide for the additional traffic and provide assistance with congestion on the current ring road.
	LPP04235	Option A	Support	Option A is the best and only way forward, the only logical solution
	LPP04474	Option A	Support	These are THREE good reasons to decline the Stourport-on-Severn proposal and choose the Kidderminster option which has given more attention to the additional infrastructure requirements of the area.
	LPP03231	Option A	Support	<p>It seems logical to base houses closer to employment hubs, major transport links (rail & road) and where there's potential for increased school provision. There's the added benefit of the Eastern Relief Road which should help with the current well-known traffic problems around the roads in Kidderminster (A449, Hoobrook, the Horsefair etc).</p> <p>Improvement to these traffic problems should also help to improve/stabilise the current air quality issues.</p> <p>The benefits of Option A outweigh the disadvantages as long as the new infrastructure is built/developed at the same time as the housing to make it a sustainable development.</p> <p>There will be an additional economic benefit to the town as a whole, new houses mean new people who will shop, eat and spend their leisure time and money in Kidderminster.</p>
	LPP03273	Option A	Support	Prefer Option A
	LPP03293	Option A	Support	Overall the features of Option A, together with the existing infrastructure and facilities of Kidderminster and the area to the east of the town, would more appropriate to better the

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				development on the scale proposed.
	LPP03358	Option A	Support	<p>Please find below my proposal in favour of Option A. The reasoning to support this Option relies solely on its viability with regard to existing and proposed infrastructure.</p> <p>Transport links, accessibility, and the provision of services including educational have been positively accounted for in the proposed Option A. The Relief Road relinquishes current pressures on Kidderminster town traffic and the A449, whilst also ensuring easy access to the M5 and Birmingham. Most importantly, it enables direct, easy access to Option A's two concentrated urban developments.</p> <p>These two sites can enjoy convenient transport links and all that the main town has to offer, including existing educational establishments and the higher than required employment opportunities. The utilisation of the sites minimises aesthetic disruption beyond two concentrated areas. Adherence to existing national and local authority affordable housing policies can be realised when Option A is adopted.</p> <p>It seems nonsensical that Option B can be considered, especially after residential concerns noted at 2.10, Local Plan Review – issues which were echoed by planning officers in the recent refusal of planning application for 125 homes at Astley Cross. Issues of site suitability and the risk to the nature and character of the landscape only stand to be amplified by Option B's mapped locations. It is acknowledged in the Local Plan Review that more green space would have to be utilised in Option B, reducing the likelihood of adherence to Green Infrastructure policies.</p> <p>With regard to site suitability, it begs the question whether local Housing Policies, Adopted Development Plans, the Adopted Wyre Forest Core Strategy, Adopted Wyre Forest Site Allocations amongst others have been seriously considered in mapping Option B.</p> <p>It is not just the distinctive countryside within the District that risks adverse harm from Option B development, it is the already stretched infrastructure. With goals noted in the Local Plan Review</p>

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				<p>to limit the need for travel and ensure sustainable alternatives are available, it must be noted that in Areley Kings for example, there are extremely limited public transport options. This is typical of the District outside of the main towns.</p> <p>Employment opportunities are noted in the Option comparisons to be much less than Option A, and it is disappointing the Local Plan Review has continued to fail to remedy the relationship between land availability, housing completions and employment opportunities.</p> <p>With such limited employment options within this rural corner of the District, use of a car is somewhat imperative. Road users within this vicinity currently face the dangers of on-road parking, and increasingly a blatant disregard for speed limits by drivers - issues which would be exacerbated with greater road users.</p> <p>Accessibility to amenities is limited to the river crossing at Stourport-on-Severn which already faces extreme congestion, again acknowledged in the refusal of application noted above.</p> <p>Whilst Option A accounts for transportation options, sustainable alternatives and seeks to minimise the need for travel in its proximity to amenities, it must be remembered that there is no way of dispersing this additional pressure to infrastructure if Option B were to be adopted.</p> <p>The severity of the shortcomings of the existing infrastructure which would be pressurised further by Option B with no remedies offered, makes Option B prohibitively detrimental to the District for many reasons, only a few of which have been noted above.</p>
	LPPO3429	Option A	Support	I wish to register my support for plan A.
	LPPO3452	Option A	Support	Support Options A.
	LPPO3495	Option A	Support	We support the basic thrust of the proposals including the limited use of Green Belt land, the need to ensure adequate provision of affordable housing and appropriately sited provision for

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				<p>the elderly and single occupation.</p> <p>Any proposals to reduce traffic through town centres are to be welcomed. Pedestrianised zones in Kidderminster have been a great improvement and should be extended wherever possible.</p> <p>These measures would help to improve air quality.</p>
	LPPO3517	Option A	Support	I support option A as I believe this area could support and increase in population BUT brown belt land must be sort in preference to Green Belt land at the Spennells site.
	LPPO3527	Option A	Support	<p>Option A</p> <ol style="list-style-type: none"> 1. We agree it is very important to preserve the wildlife corridor. 2. Housing suggested in Option A would be closer to employment and education opportunities, therefore requiring less travel. 3. The proposed new Kidderminster Eastern relief road would be very welcome, easing congestion in Kidderminster. This would have the added benefit of improving travel to Worcester, Birmingham and M5 etc without having to go via the town centre. 4. Any new houses in these areas would benefit from this and also the added benefit of easy access to the two mainline railway stations at Kidderminster and Blakedown.
	LPPO3533	Option A	Support	I think Option A is preferable as it includes the relief road which surely is desperately needed and suggests better school provision.
	LPPO3535	Option A	Support	My feelings regarding the proposed local plan consultation are that WFDC has already made their choice and that this consultation is just a formality they have to go through, based on the fact that there are only going to be infrastructural improvements done to option a this is the one id prefer, id also like it noted that should any further plans for housing be made in Stourport that none is allowed without the developer doing something to improve the roads and local facilities before any permission is granted.

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	LPP03582	Option A	Support	Our favoured option is A because they can get the roads changes. Stourport is getting none.
	LPP03585	Option A	Support	Support Option A
	LPP03606	Option A	Support	Option A preferred choice.
	LPP03656	Option A	Support	Support option A.
	LPP03695	Option A	Support	<p>Option A</p> <p>Proposes significant new infrastructure in the form of a new road, The Eastern Relief Road, improved access to Kidderminster Railway Station and links to the national network. This will have the advantage of reducing traffic congestion in Kidderminster town centre and nearby estates as well as allowing easy access to the economic powerhouse of Birmingham where many well paid jobs are to be found.</p> <p>It also ensures that there will be sufficient school places for the new residents.</p> <p>Although the Lea Castle site lies within the designated Green Belt this has previously been built upon and in its current derelict state is an eyesore and a blot upon the landscape. Development here would only be an improvement.</p> <p>Although it is understandable that many of the residents affected by option A will be deeply unhappy by the proposals this is clearly to be preferred to Option B as the new infrastructure and proximity to the economic opportunities of Birmingham and the Black Country will bring many advantages to the district as a whole.</p>
	LPP03709	Option A	Support	Prefer Option A.
	LPP03728	Option A	Support	Prefer option A
	LPP03730	Option A	Support	In favour of Option A.

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	LPPO3788	Option A	Support	Plan A is the better solution.
	LPPO3797	Option A	Support	Support Option A on good planning grounds as it would result in new and much needed infrastructure improvements, esp. a new Kidderminster Eastern By-Pass.
	LPPO4036	Option A	Support	<ul style="list-style-type: none"> The Kidderminster/Stourport corridor has seen a lot of development in recent years, with several new housing developments. With these have come increases in noise, litter, traffic and road accidents. There is also insufficient parking for local business, with overspill onto side streets and across people’s private driveways. Channelling more traffic via this route under Option B would be greatly distressing for residents and detrimental to their health and (road) safety. Keeping facilities more localise in outlying areas should hopefully prevent this from happening Outlying areas will also benefit from local developments and as such should share in the inconveniences caused. Whilst I understand people’s concerns around loss of Green Belt land, I believe Option A to be far a far more sustainable and common sense approach to development that will spread the strain across the region rather than concentrating it in areas that are already badly affected.
	LPPO4080	Option A	Support	<p>I believe Option A is the answer to local planning. The new developments improve infrastructures, including a Kidderminster by-pass. Option A is on the best side of Kidderminster, improving road access to Bromsgrove, M5, M40, M6. No bridge access is needed.</p> <p>Option B is piecemeal and involves no road improvements, no access improvements over Stourport-on-Severn bridge which is already running to full, with long tailbacks throughout the year. Through Astley Cross village, it is single lane; with good manners keeps it running. The road leads to the Stourport-on-Severn bridge. Traffic congestion is already a problem over Stourport-on-Severn and Bewdley bridge.</p>
	LPPO4111	Option A	Support	In relation to the two preferred options being put forwards for development it seems that the obvious option to adopt is Option A as opposed to Option B. I believe this to be for the following

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				<p>reasons:</p> <p>Infrastructure - Option A includes for the proposed Eastern Relief Road which will assist in managing the added traffic which will come to our district as part of the increased population. Preferred Option A would also place residents a lot closer to public transport links such as Kidderminster and Blakedown train stations to access larger neighbouring towns and cities such as Worcester and Birmingham.</p> <p>Employment - All proposed new employment opportunities are being shown on the maps as being in the Kidderminster area so it would make sense to build the new housing nearer to these jobs which will therefore point towards Preferred Option A being the better option. Preferred Option A with the proposed Eastern Relief Road will make it easier for residents to get to the new employment opportunities within our region but will also allow easier access to employment opportunities outside of our initial region in areas such as Worcester and Birmingham.</p>
	LPPO4185	Option A	Support	<p>I wholeheartedly agree with proposal A where the potential building is all in one area.</p> <p>Pressure on schools and medical services are localised so new ones can be built rather than cause chaos trying to fit people in to existing 'full' facilities.</p>
	LPPO4214	Option A	Support	<p>Neither Option that you offer is totally consistent and I have concerns about both.</p> <p>Of the 2 on offer Option A would seem to be the lesser of two evils and slightly better aligned but have real additional fears that it presents the dangerous significant prospect of narrowing the essential gap between the West Midlands Conurbation and this part of Worcestershire with its unique history and traditions.</p>
	LPPO3078	Option B	Comment	<p>I prefer Option B as the housing is spread more evenly across the area rather than a large scale expansion of the eastern side of Kidderminster which would cause even worse traffic.</p> <p>It would also impact on the quality of life of people living on Spennells and surrounding areas</p>

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				who have a large area of countryside which they can access and use regularly for exercise.
	LPP03158	Option B	Comment	Prefer option B. I think there would be more benefits from dispersed strategy.
	LPP03164	Option B	Comment	Prefer option B. More benefits from dispersed strategy.
Land Research & Planning Associates Ltd	LPP0553	Option B	Comment	OPTION B is the preferable one. Still concerns.
Land Research & Planning Associates Ltd	LPP0555	Option B	Comment	NO.
	LPP0181	Option B	Comment	Option B is preferable because it develops the community as whole not just Kidderminster. Expansion and future proofing of school across the district is more equitable.
	LPP0182	Option B	Comment	No. The infrastructure is only necessary, if the development takes place. Improve existing infrastructure.
CORE11	LPP0242	Option B	Comment	We opt for Option b for the reason that, The core strategy and green infrastructure study 2010 which give prime importance to local green infrastructure and a good place to live, will be weakened if "Option a" is chosen. It would be the start of a brick and cement conurbation that is not sustainable, nor could be reversed.
Homes England	LPP0795	Option B	Comment	Provisional requirement for 6,000 dwellings for the Plan period, with the inclusion of previously developed land, including the former Lea Castle Hospital site, and potential greenfield releases, this leaves a shortfall of 2,360 dwellings. Option B, a more dispersed strategy, requires a larger number of sites to deliver the additional 2,360 dwellings, including the release of smaller sites within the rural areas. Development in the

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				<p>smaller towns and rural villages would help to support these areas through the provision of additional housing including affordable housing, as well as local jobs through construction, and transferable benefits to those areas provided by the additional population generated by the development. It will also provide choice of location in the housing market, and may deliver housing quicker than focusing on a small number of larger sites.</p>
	LPPO623	Option B	Comment	<p>Employment opportunities are located throughout the district so makes sense to have the housing also dispersed throughout the district so that local people can live closer to where they work, especially as local transport is poor. The bus service is poor and there are no buses at all at the times needed to get to and from the safari park for early or late shifts. Enabling people to live closer to where they work would reduce traffic congestion and allow the possibility of walking or cycling to work.</p> <p>Option B also helps to preserve open space between Kidderminster and the village of Stone, retaining it as a separate community, and retains green space where the local community can exercise. Option B is much better for wildlife as it maintains access to open countryside for the Spennells nature reserve and the important wildlife site at Captains pool allowing wildlife to move freely and so maintain viable breeding populations.</p> <p>Option B is better than option A although some of the core sites in both options are of concern. The plan to build on the fields up to Hurcott village conflict with the aim to maintain clear space between Kidderminster and surrounding villages. It also puts at risk the SSSI at Hurcott with potential detriment to the wildlife there. I object to the proposal to build on the land currently occupied by Captains and The Lodge on the A448 since that will impact on the wildlife using the pool, the woods and surrounding areas. There are hedgehogs living around the site, a species under considerable pressure. The Captains site would contribute to the congestion on Comberton Road going into Kidderminster and also the Mustow Green roundabout, both currently places where long queues can occur that will not be helped by another 300 houses. The proposed Eastern Relief Road would be unlikely to have any positive impact traffic since it would run between two known bottlenecks and merely move the traffic jams to areas</p>

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				just over the border of Wyre Forest.
Worcestershire Wildlife Trust	LPP01052	Option B	Comment	<p>We note that option B has a reduced impact on Green Belt (by area) which is welcome and would be broadly in line with the Government’s stated position on Green Belt release. However it retains an unacceptable allocation at Wilden Lane and will still lead to considerable impacts on designated sites and wider biodiversity elsewhere. As a result, and considering guidance in the NPPF (in particular biodiversity guidance in paras. 9, 109 and 117), we do not believe that Option B as it is currently set out offers a sustainable solution to development at present. Please see our comments in response to Paragraph 6.54 for more details.</p> <p>Nonetheless for the reasons set out in our response to Paragraph 6.55 we are not yet convinced that the case for the eastern relief road has been adequately demonstrated and so we do not believe that Option B is fundamentally flawed in not bringing this element of the plan forward. Moreover, whilst we acknowledge that a more dispersed development strategy does cause some infrastructure difficulties we believe that the advantages it has in terms of reducing the risk to biodiversity to the east of Kidderminster outweighs them at this time. We can find nothing in the evidence base to demonstrate otherwise.</p>
RSPB Midlands Regional Office	LPP01174	Option B	Comment	<p>To summarise our position, on nature conservation grounds alone, the RSPB favours Option B.</p> <p>If Option A is chosen the impact on wildlife of local and County importance (specifically, the local corn bunting population) is likely to be greater, and would prompt the need seriously to examine the scope for large-scale habitat compensation in the form of species-rich grassland creation for corn buntings, as part of the development package.</p> <p>If Option A is selected, we recommend further consultation with WMBC to identify how and where best such compensation can be delivered. The RSPB would also be happy to advise further.</p>
	LPP01971	Option B	Comment	My preferred option is Option B providing more housing with less loss of Green Belt.

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	LPPO1870	Option B	Comment	Option B - not loss of Green Belt and reusing the brownfields, consider going for option B
	LPPO3032	Option B	Comment	<p>Question 3 - Do you prefer a more dispersed strategy?</p> <p>Answer. - Yes, as the District Council in not in control of the provision of a relief road/school provision it cannot guarantee their provision.</p> <p>Favour Option B.</p>
	LPPO3045	Option B	Comment	<p>If a choice had to be made between Option A and Option B, which should not be necessary for at least the next 10 years, based upon the house building projections, I would choose Option B since this would use 22% less Green Belt land (218 hectares compared to 266 hectares in Option A). It would also provide potential residential building of 6559 dwellings compared to only 6304 dwellings in Option A, 255 more dwellings. It would enable development to be more evenly spread around the Wyre Forest in areas where local communities need dwellings for organic growth, rather than in the overcrowded Spennells area. This would place less stress upon existing infrastructure around Kidderminster.</p>
	LPPO3053	Option B	Comment	<p>Kidderminster central and its surrounding areas have so many brownfield sites in which to build and develop. Building in these areas, could regenerate Kidderminster central and transform it from the ghost town it currently is.</p> <p>I am asking that you choose option B as the better option for our area.</p>
	LPPO2691	Option B	Comment	<p>I am writing to express my objections to the local plan review preferred options consultation.</p> <p>They are as follows-</p> <ul style="list-style-type: none"> The Councils own statistics show that there are enough brown fields/other capability to fulfil government targets for ten more years. The proposal is for five years (beginning in 2019 will run until seven years from now), and as such no release of Green Belt land will

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				<p>be necessary during this period- “The Green Belt is 13% of the land. We can solve this crisis without having to take huge tracts out of the Green Belt,” the housing minister, Gavin Barwell, said. “They can take land out of the Green Belt in exceptional circumstances but they should have looked at every other alternative first,” he said, including building on brownfield land, releasing surplus government land, increasing the density of projects in towns and cities, or partnering with neighbouring Councils.</p> <ul style="list-style-type: none"> • Whilst I appreciate that there are difficulties in attracting building companies to build upon more difficult sites, allowing the release of more lucrative ‘easier option’ sites will only exacerbate this problem. It may be argued that the Council can negotiate a ‘tie in’ for companies to build upon brownfield/other sites alongside ‘easier’ options, they will then be able to pay a levy to the Council rather than completing these obligations. The Council will not, however, be obliged to spend these resources in Kidderminster/to improve local housing stock that utilises brownfield/other sites. • The preferred option A removes more than twice the amount of Green Belt from our local area than option B (2% as opposed to the Government’s nation benchmark of 1%). This option is purported to allow for new road networks and supporting, but as no information is available, it must be assumed that this is a desire rather than an absolute fact. If one of the two options is to be adopted then option B is the most appropriate, as it will simply extend an already existing new development area with its own direct transport links to both the Wolverhampton and Stourbridge main roads. • In light of the above points my vote as a constituent of this area is that- Firstly, that both plans A and B are unnecessary and unacceptable, but that secondly IF one must be adopted, then it should be plan B.
	LPP02533	Option B	Comment	I prefer Option B. I do not feel the benefits of a more dispersed strategy outweigh the disadvantages, however, the reasoned justifications for Option A seems flawed in many ways, see previous comments.
	LPP02276	Option B	Comment	Which sites do you prefer? – Dispersed Option B

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	LPP03801	Option B	Comment	I object to the Council's strategy for development; evidence shows that the scale is unnecessary. However I prefer Option B notwithstanding I object to the analysis re scale of development.
	LPP03361	Option B	Comment	<p>Option B is more reasonable and realistic, but I would still question whether the existing infrastructure can support such a large number of new houses and the families that will live in them.</p> <p>Kidderminster currently I believe has 3 ambulances and only 1 permanent fire fighting crew. Stourport has 1 ambulance car.</p> <p>Kidderminster hospital has been desecrated and as we all know, all 3 hospitals that serve the area are in special measures with services at bursting point or having been removed completely.</p> <p>What plans do the local authority have to support, maintain services and protect the health and safety of people living in the district?</p>
	LPP04497	Option B	Comment	Option B is my choice but no option chosen should include Green Belt land.
	LPP04455	Option B	Comment	Concern re loss of Green Belt
	LPP04458	Option B	Comment	<ul style="list-style-type: none"> • Static population growth - no need for new houses. • Aging population downsizing - freeing up family sized houses. • High obesity levels - why build on Green Belt land where leisure and exercise activities occur.
	LPP04459	Option B	Comment	We refer first to your request for residents to choose between options A and B of this Review. We prefer neither but wish to comment on their relative merits. In your document the choice is clearly presented in favour of Option A based on two major considerations: 1. provision of educational, medical and community facilities and 2. Provision of a relief road between the Worcester and Birmingham roads. It appears that this advice is related to planning convenience

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				<p>for WFDC. Our comments are:</p> <p>1. Wherever additional housing is built, extra facilities will need to be provided whether they be centralised in just one conglomeration, or existing provisions are expanded to suit needs.</p> <p>If one of the two options A or B has to be chosen then Option B would be the most equitable way of accommodating the suggested housing requirement.</p> <p>Non-Green Belt sites available for building can provide in the region of 3000 houses. This number should surely be more than sufficient for local needs.</p>
	LPP04449	Option B	Comment	<p>Option B requires the acquisition of numerous sites making the process slower and more complex. The additional educational and other facilities required would therefore be more piecemeal and less straightforward. Some sites in Stourport already have permission for development. Transport links are not particularly well supported and the already congested town of Stourport does not have the option for use of a relief road.</p>
West Midland Bird Club	LPP04409	Option B	Comment	<p>We strongly object to both proposals because of the devastating effect these proposals would have on all wildlife within the planned areas. This land is Green Belt Land, South of Spennells and WFDC Core area, East of Offmore Estate. These areas should be maintained for farming and for recreational use such as walking and bird, butterfly and moth surveying. The public foot paths and bridle ways are used daily by both residents and visitors.</p>
	LPP04411	Option B	Comment	<p>Both options rely on developing Green Belt land which I believe is the 'easy way out' for the council and is supported by some extremely questionable 'evidence', particularly the extremely poor quality of the 'objective assessment of housing need'.</p> <p>Developing Green Belt land is extremely short sighted for a number of reasons, but especially in the light of 'Brexit' as the Green Belt land earmarked by the council is very productive farm land which will be of benefit to the country (and of course, local farmers) if tariffs are placed on</p>

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				<p>produce grown in Europe.</p> <p>The Green Belt is also supposed to stop communities merging into one another and becoming yet another urban sprawl.</p> <p>Building on Green Belt land is also the easy and most attractive option for developers, and the easy option for the council. The council should not give in to pressure from developers and land owners eager to make a 'quick buck' instead of thinking more creatively about where new housing should be allowed, but instead should consider the needs and well-being of local people and put them at the fore-front of their decision making.</p> <p>Both options also mean a disproportionate amount of housing development would centre on and around Kidderminster, which does not have the infrastructure to support it. The schools are now near or at capacity, so where does the money come from to provide new schools for these developments?</p> <p>I would challenge the need for so many homes in the area. The growth forecasts on the OAHN have been over-inflated, as there has not been significant rise in the local population in the past 10-15 years.</p> <p>There is very little employment actually in the Wyre Forest and most people commute to bigger towns and cities to work. Already, all roads in and out of Kidderminster are congested during the morning and evening 'rush hours' and building more, unnecessary, homes would make that worse, as people would come to live here, but have to commute elsewhere to work.</p> <p>My preferred choice of the two is B, as it has less impact on Green Belt land, especially with regards to the fields adjacent to Spennells.</p> <p>Although I reluctantly support option B, I do not think we have been offered a fair choice at all and if this is indeed a consultation exercise, perhaps the planning policy team will take on board</p>

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				the objections I and hundreds of others in the Wyre Forest have submitted and come up with a better thought out option C. Finally, it seems unreasonable that an unelected planning policy team and a few local councillors on the planning committee have the power to make such momentous decisions that will have such a detrimental impact on so many people's lives. Some of the planning committee also have Green Belt land earmarked for re-designation in their ward and will naturally be under pressure from residents to oppose development there and instead vote for it in another ward. I hope that this will not be allowed to happen.
	LPP04415	Option B	Comment	I do not support option B. I would urge you to consider the requirements of local residents, rather than those of large developers in this plan, as well as the implications of destroying the local countryside, which is well used and loved by the local community. Have a look at brownfield sites first.
	LPP04416	Option B	Comment	Option B already has significant road access especially surrounding the Lea Castle area. Spreading the housing out across the district would help spread number of children needing schools although a primary school should be made for either option and would be needed for the Lea Castle area. More importantly reducing the number of houses needed would mean less Green Belt is used in option B as more brownfield land is used. Something the council should push for harder
	LPP04418	Option B	Comment	I neither fully support option A or B as they stand at present. I do feel that housing should be spread as equally as possible across Wyre Forest so that it does not negatively impact one side/area. I also would also not support Lea Castle becoming a huge estate because of its surrounding road links. I do not support any surge to push housing onto Lea Castle so that building does not have to occur to the south/Spennells area or Stourport— any building should be fair to all areas and the load shared. There is argument that south of the town is better access to the motorways. I do not support building on the land opposite the entrance to Lea Castle. I am in support of a relief road, but were this not in the final plan then even more the need to 'spread the load' in terms of housing and commuting as well as easing traffic in already busy and congested areas. Controlling traffic flow/safety is paramount. Planning must take on board residents' concerns so as not to disadvantage people like myself who have lived in Kidderminster

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				and the surrounding areas all their life. People need to feel that Wyre Forest District Council is there for all its people.
	LPP04419	Option B	Comment	Prefer Option B.
	LPP04431	Option B	Comment	I would like to highlight my objection to WFDCs plan to sacrifice large swathes of Green Belt land around Kidderminster for housing development and do not support option B.
	LPP04251	Option B	Comment	<p>We are in favour of a sensibly modified Option B for the following reasons:</p> <ul style="list-style-type: none"> • The Population Growth figures suggested in the report are speculative and dependent upon the aspirational target for employment growth. • Option A states there is no significant natural interest in Spennells Fields and the site known as Captains. This is incorrect. • The local infrastructure demands of any development are not addressed. • There is a failure to take a holistic view of the housing need alongside that of the Southern/ Eastern bypass and the development of the Railway Stations. A bypass consumes large quantities of land. • Option A will not address the need for affordable homes. (CRE) • There will be a major and significant loss of amenity to the residents of Spennells should Option A be adopted. • The suggested growth of Employment Opportunities in the Wyre Forest is not supported by current employment patterns. • Watercourses are already compromised in the area known as (WFR/ST/1) Captains and The Lodge. • The loss of Green Belt, arable land and hedgerows should not focus in the main on one particular area. Wyre Forest will be best served with a geographically widespread plan.
	LPP04367	Option B	Comment	Only support if all the alternatives to Green Belt development have been fully explored and any development was dispersed.

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	LPP04654	Option B	Comment	<p>In effect, both Options A and B suggest ribbon development. Neither option envisages a community that could be centred in the midst of the development.</p> <p><u>Option B</u> the second bullet point says “Additional development at Lea Castle will put additional pressures onto the A551 and A449”. This statement ignores the fact that Baldwin Road, and Hurcott Road, are already used as a rat run for traffic on the A456 from Birmingham travelling to and from Stourbridge and Wolverhampton. Development to the east in both options may also be used in this way. In addition, the Government’s own policy “to conserve, enhance and restore the diversity of England’s wildlife” would be compromised by the effects on Hurcott village nature area.</p>
	LPP04840	Option B	Comment	<p>I have questioned the impact of an Eastern Relief Road. If Option A was adopted a new access road would be required but other than access to the new developments it is not shown how it would relieve congestion on the existing network. Any development would increase air pollution. More analysis would be required here.</p> <p>‘The absence of additional infrastructure impacting oneducational provision’ is at odds with the Draft Wyre Forest Infrastructure Delivery Plan (2017), which indicates the estimated Education Infrastructure Costs for Option A at about £30m and about £25m for option B. This indicates an impact of the same order of magnitude and therefore at this stage of the argument probably not significant.</p>
	LPP05124	Option B	Comment	Option B uses less Green Belt and creates more houses yet isn't the council's preferred option.
	LPP03152	Option B	Object	Concern with option B.
	LPP0487	Option B	Object	I object to Option B
	LPP0426	Option B	Object	<p>I object to Option B.</p> <p>Green Belt land should be used only as a VERY LAST RESORT.</p>

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				<p>Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collaborate and collectively review overall brown field site availability and plan housing development accordingly – decisions to build on the Green Belt should not be based on local authority boundaries.</p> <p>The 5 year rolling time frame for construction sites should allow for regular reviews of brown field sites and enable changes to be incorporated into any plan,.</p> <p>The plan fails to recognise changes in shopping habits and unrealistically targets retail expansion and comparison shopping.</p> <p>Kidderminster has suffered from the failure to 'tidy up 'following the migration of Kidderminster town centre to Weavers Wharf and Crossley Retail Park.</p> <p>Retail premises and the courts building have been empty for 8 /9 years - the regeneration of such sites require radical solutions for alternative use that reduce any need to build on the Green Belt.</p> <p>Unnecessary decisions are being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping (indeed, the plan itself demonstrates an inability to predict /understand short term population levels in the District).</p> <p>The plan fails in its stated aim to "to use a robust and up-to-date evidence base to ensure that the local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" . Instead it aims to justify what developers want to deliver rather than meet the needs of Kidderminster residents.</p> <p>Previous attempts to build an Eastern relief road have failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph road following the same route as the existing road from the Worcester Road through Mustow Green to the Birmingham Road - is it</p>

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				<p>really a relief road at all?</p> <p>Whilst constructing a new school in the Spennells area appears attractive this (together with the promise of the 'relief road' shouldn't be the determining factor when opting to build on the Green Belt – other options should be sought.</p> <p>Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years. This situation equally relates to the areas covered by the LEPs identified in the plan.</p> <p>Whilst economic development in Kidderminster will be welcome - past experience shows this will take time – in the meantime people will continue to travel.</p> <p>Immediate need is for fresh radical thinking that optimises the use of brown field sites throughout the LEP areas for residential use and enables Kidderminster itself to become a modern, contained and attractive town centre that incorporates retail leisure and residential opportunities rather than pursue outdated models from the past - 'mixed use' communicates little other than the elements of 'wishful thinking' so often reported in the local press over numerous years.</p>
	LPPO366	Option B	Object	<p>If new houses are required the infrastructure MUST be in place which has to include roads (Stourport is already gridlocked most of the time) schools are oversubscribed and doctors at capacity.</p> <p>Green Belt must be protected at all costs, use brownfield sites first for any houses/schools and doctors.</p>
	LPPO402	Option B	Object	See summary LPPO400.
	LPPO614	Option B	Object	This was published under the 2010 to 2015 Conservative and Liberal Democrat coalition

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				<p>government-:</p> <p>This government has been very clear that when planning for new buildings, protecting our precious Green Belt must be <u>paramount</u>.</p> <p>Local people don't want to lose their countryside to urban sprawl, or see the vital green land around their towns and cities go to unnecessary development.</p> <p>The council can meet their housing needs by prioritizing Brownfield sites, and fortify the Green Belt in their area.</p> <p>Only when every brown field site is exhausted should any consideration be given to Green Belt land.</p> <p>Greatest concern is the pollution due to vehicle exhausts, it is already very high due to queuing traffic outside of my home which is close to Burlish Crossing.</p> <p>I live next to Green Belt land and would like it to remain so. I say no to Plan B.</p> <p>I am strongly against any Green Belt land being used until all brown sites have been used.</p>
	LPPO2073	Option B	Object	<p>Please respond to following::</p> <p>The infrastructure for option B's dispersal strategy is of concern. Stourport facilities can't cope now e.g. lack of public toilets, so improved infrastructure - schools, roads, doctors, fire services needed first.</p> <ol style="list-style-type: none"> 1. Building a new town possibly at Lea Castle, is more sensible/cost effective and

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				centralising will reduce the impact on Green Belt.
	LPPO2079	Option B	Object	<p>Option A, with an eastern by-pass/new link road from Birmingham Road, is preferable to Option B.</p> <p>Kidderminster and Stourport are already stretched - doctors, dentists, schools and heavy summer traffic w/o any new development.</p> <p>Option B has always been farmland so despite need for extra housing, the sites in Areley Kings are not feasible and opposed to by myself/others. The road from Areley Kings to Stourport is narrow and could not cope with extra traffic.</p>
	LPPO1902	Option B	Object	Plan B would be unthinkable with the number of houses to be built adding to the already ridiculous amount of traffic on the Areley Kings side of the bridge! The infrastructure would never cope with more cars, people dying for space! The schools, doctors and roads are at breaking point now!!
	LPPO1939	Option B	Object	I object to both Options and I think it should be re-thought. This is a massive decision for Wyre Forest so we must be sure to get it right. Protect all Green Belt as far as possible.
	LPPO2954	Option B	Object	<p>Nobody wants to lose greenfield sites and would hope that all brownfield sites would be developed before any other land was considered.</p> <p>Stourport/Bewdley area would be worse off because of the heavy traffic problems already experienced by crossing the bridges. It seems that Option A would include new infrastructure whereas Option B will not include any.</p>
	LPPO2895	Option B	Object	In the draft plan there are aspirations to redress the imbalance in the age of the population, attract more business and jobs. Destroying the Green Belt to build houses does nothing to address these aspects of Kidderminster's future. The idea that almost 6000 houses are required when clearly the population of Kidderminster is not growing at a significant rate seems like a

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				<p>grossly inflated figure. The 2.7% increase in the last two years is almost certainly the effect of increased immigration from Europe, which may reduce as some return to their own countries following Brexit.</p> <p>Average age and jobs: To lower the average age of the population it is necessary to attract young people to the town for which you need jobs and cheap housing. In fact the biggest problem facing youngsters today throughout the UK is that they can't afford to get on the housing ladder. Just building new houses on Green Belt land will not help. A potential solution to the housing problem would be to have the derelict and unoccupied properties, of which there are many, in the town converted to flats. This may require the use of compulsory purchase orders, which must be within the power of the Council. The resultant dwellings, would be cheaper to buy or rent, would attract young people and would help to revive the town centre. The proposed use of the Glades site for retail should be changed to more flats for the same reason. Cheap housing will not be found on Spennells Green Belt. Young people will be the people to develop new businesses; older people with established careers will be reluctant to take risks.</p> <p>Green Belt effect: Building houses on green field sites to the east of Kidderminster could have an adverse effect on the average age of the population. Any developer building on that land will want to build 4 & 5 bed houses not only to increase his revenue but also to recover the cost of the land he has purchased. They will not want to provide affordable housing at the 30% level. This will attract commuters from Birmingham and Worcester. And will exacerbate the commuting problem.</p> <p>My objection: I am strongly opposed to both of your preferred options. I believe that developing cheap flats for younger people will balance the ageing problem and help to create new businesses. I believe that to meet the need for affordable housing all brownfield sites in the town should be redeveloped first. No Green Belt land should be built on until the redevelopment of the town centre has been completed and all flats occupied.</p>
	LPPO2896	Option B	Object	I understand and accept that more housing needs to be built in the Wyre Forest area but I feel it

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				<p>is essential to upgrade, develop and extend road ways/links which are already very busy in order to keep traffic flowing.</p> <p>Infrastructure needs to be upsized to cope with the extra population particularly:</p> <p>Schools — In our area I believe Cookley Primary cannot cope with any more capacity and both Cookley and Wolverley Secondary school have very restrictive vehicle access and parking capacity. I think provision for new school(s) would be essential.</p> <p>Hospital — It is my opinion that Kidderminster Hospital already desperately needs upgrading to serve the people of Wyre Forest and surrounding areas so obviously with more population that would become even more important — we cannot keep adding to the pressure of Worcester and Russell’s Hall.</p> <p>Of the two options proposed in the local plan review, I think Option A is preferable as it includes the relief road which surely is desperately needed and suggests better school provision.</p>
	LPPO2855	Option B	Object	I strongly object to Option B.
	LPPO2863	Option B	Object	Option B is more dispersed and will not bring any improvements but will worsen traffic congestion on Bewdley and Stourport bridges and affect the air quality in Dunley Road area
	LPPO2747	Option B	Object	Objection to the whole draft local plan for Wyre Forest.
	LPPO2702	Option B	Object	<p>I strongly disagree with both Options A and B.</p> <p>There is no need for 6,000 new houses in Kidderminster. As in the Council's own report the population of Kidderminster has remained static. Therefore I do not believe there are "exceptional circumstances" in Kidderminster that require the removal of protection of Green Belt land to build so many houses. A new, fair independent report should be completed as the</p>

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				<p>existing one is obviously biased.</p> <p>If no alternative can be found I prefer Option B as it develops less of the Green Belt and it is much fairer to spread the developments. People prefer to have a choice of area to live in to be close to existing friends and family so I believe spreading out development would be better for the people of Kidderminster.</p>
	LPPO2709	Option B	Object	<p>Please note my objections to both Option A and Option B of the Local Plan Preferred options.</p> <p>I don't think it's fair to offer a Plan A and B which both involve destroying our local Green Belt which is so close to many of our residents' hearts. Green space is important for emotional and physical wellbeing. As a nation, we grow less than two-thirds of our own food. Now, more than ever, we need to avoid unnecessarily losing our countryside. Why can't we utilise our brownfield land instead of destroying our precious countryside, which is home to rare and endangered wildlife like the Corn Bunting, Long-eared Bat and a Horseshoe Bat.</p> <p>I have lived in Kidderminster many years and have always valued the local Green Belt. It played a huge part in my childhood wellbeing and I have very fond memories of going on nature walks with my family and playing with my friends. Our Green spaces should be protected as once they are gone they are gone for good.</p> <ul style="list-style-type: none"> • Green spaces and farmland are important habitats for wildlife, some species of which are rare/endorsed i.e. the Corn Bunting. • In our efforts to tackle the housing crisis, suitable brownfield land and not Green Belt should be the priority. This should be utilised first and foremost, before any Green Belt land is even touched. What about the derelict and vandalised Sion Hill school site? There are places like this all over which have not been utilised after about a decade and yet you propose to destroy our Green Belt. • The amount of housing you propose to build is completely unnecessary and based on figures that apply to our nation as a whole and not the local area's needs. You have also

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				<p>rounded figures up. This is completely unacceptable and one can only assume this has been done to make money first and foremost, and not with the wellbeing of our local people in mind.</p> <ul style="list-style-type: none"> • Our local government has only closed schools over the years and you now want to move thousands more people into our town. Where will they go to school? Where will they go to the doctors, or the hospital? How will our Police and Fire services cope with the increase? There already aren't enough GPs for the town's population and it's already difficult enough to get a doctor's appointment. Kidderminster Hospital has been downgraded. • I don't feel that this proposal has been purposely kept quiet- I only found out about it from a family member who had a leaflet through her door. I didn't have any warning whatsoever and neither did several other people I know. I also believe it has been designed in a way as to pit 2 parts of our town against each other, with one side hoping you will use Option A and the other wanting Option B with no option available to people who don't want any Green Belt used. Is this not an option? • Houses on the Silverwoods development remain unsold; why is there now a need for such massive development when there appears to be insufficient demand already? This huge building project was supposed to solve Kidderminster's housing needs for the foreseeable future. Once again this contradicts decisions made by the Planners. Was the mistake then or now? • There aren't enough jobs in the area to support this huge influx of people. This will render new developments commuter ghost towns and increase traffic on main roads. <p>To summarise, I do not agree with Plan A or Plan B. I believe there is no need for such urban expansion.</p>
	LPP02474	Option B	Object	<p>In response to the two options on display at the planning consultation at Areley Kings Village Hall on 26th July I feel compelled to make the following observations and comments.</p>

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				<p>Option B is a non-starter for a number of reasons.</p> <ol style="list-style-type: none"> 1. The infrastructure in Stourport is inadequate to cope with the current demands of residents and the visitors, particularly during rush hours and summer weekends when the town is busy with holiday makers and tourists. 2. During the peak hours it is now at present normal to be stuck in massive traffic jams to enter and exit the town with the bridge traffic often stationary. I would offer the view that even as things are, should a major incident occur requiring large numbers of emergency services vehicles needing to access the bridge, it would be impossible to be dealt with in an efficient manner and would inevitably result in delays resulting in serious injury and a potential loss of life due to the current volume of traffic. <p>With this in mind I dread to think what the consequences could be with the additional housing and population should option B be adopted in the event of any unforeseen catastrophe?</p> <ol style="list-style-type: none"> 1. If plan be were to be adopted where would the children of school age be educated? Two schools have been closed in the last few years, once again this will mean additional cars on the road during “the school run” which will also add to the problems mentioned above while increasing the parking problems associated with dropping off and collecting the children. 2. As a pensioner with health problems I feel qualified to question whether the two doctor’s surgeries could cope with the additional influx of patients as it is not unusual to have to wait several days for an appointment now. 3. About 10 years ago Vodafone applied to erect a telephone mast adjacent to the field in Pearl Lane. Research uncovered certain facts, one being the field on Pearl Lane is part of an “area of outstanding natural beauty” and as such cannot be built on! It goes without saying the proposal was turned down by the Planning Committee. <p>In closing I wish to object to Plan B on the above mentioned grounds as I feel Kidderminster is better equipped to handle the increase in population and the town centre is in desperate need of</p>

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				the extra footfall to make it a viable area for future investment.
	LPPO2269	Option B	Object	<p>We oppose the adoption of the Local Plan, both Options A & B including the Core Areas of The Captains and the Lodge because :-</p> <ol style="list-style-type: none"> 1. There should be no erosion of the productive Green Belt land as there will be an increased need for the UK to provide more food production rather than import food once we have left the EU. 2. Loss of Green Belt will further endanger wild life, both flora and fauna. 3. Loss of Green Belt will also reduce the natural area for people to exercise, as the current areas have many public paths. 4. Proposed building on areas designated as natural flood plans seems fool hardy, as there is plenty of local evidence showing the damaging effects this can have on other areas. I.e. Bewdley, Upton on Severn, Tewksbury etc; 5. Loss of Green Belt will add to the global warming effects that are projected. 6. The increase in population predicted in the new plan will not be able to be employed within Wyre Forest and will thus need to commute to Birmingham and West Midlands, and Worcester. The Wyre Forest has seen a reduction in manufacturing over the last 5 to 10 years in trades that rely on large numbers of workers. Any new businesses are more likely to be high tech and requiring less personnel. 7. Due to item 6 above, roads will become more heavily congested, causing more health problems due to greater levels of engine exhaust emissions. 8. The existing trunk road system in and around the Wyre Forest area is currently running at full capacity with no real plans evident to address the situation. 9. Increased population will need more health facilities both at GP level and Hospital. Wyre Forest has seen Kidderminster Hospital services progressively reduced and this would need to be reversed. Likewise more GP surgeries would be required and the concern there seems to be a national shortfall in GPs. Whilst the Government states that more will be trained, the Royal College of GPs has revealed that some 20% are likely to leave. It is not clear in the Proposed Local plan if the areas required for additional medical

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				<p>facilities are included in the plan or would be additional to it.</p> <p>10. Current public transport is very poor and needs substantial investment to serve the current population levels let alone increased population.</p>
	LPPO2275	Option B	Object	<p>Option B</p> <p>Does not come with any new infrastructure and, therefore, any development west of the River Severn will increase congestion and pollution in both Stourport and Bewdley?</p> <p>In particular development at Areley Kings will exacerbate an already unacceptable level of congestion and pollution at the river crossing and along the High Street where the additional vehicle emissions occasioned by an additional 550 families (potentially 1000 plus vehicles) would require an Air Quality Management Plan which would be difficult if not impossible given the limited options in the restricted area of the High Street.</p> <p>The LPR also highlights concerns that the district has "Very poor public transport and high levels of traffic congestion with poor strategic transport infrastructure" (LPR; paragraph 2.10. p 15)</p> <p>This is especially the case in Stourport where it can take up to 20 minutes, at least, to cross the bridge from Areley Kings and negotiate the town centre by car and where most of the strategic car park at Vale Rd has already been sold to housing developers.</p> <p>Public transport is also very poor. The bus journeys from Bewdley and Stourport town centres, respectively, to Kidderminster bus station each takes over 30 minutes at best, meanders around several estates and provide no direct link to the railway station.</p> <p>Option B also fails to take into account pressures on local services such as doctors, police and fire that an additional 1547 families will make to Stourport's already oversubscribed amenities. The LPR itself describes the provision of additional sufficient, appropriately located education</p>

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				<p>facilities as "problematic". (LPR; paragraph 6.56, p45)</p> <p>It would also appear that Option B is less likely to meet the identified need for affordable housing. (LPR, Table 6.0.6, p41)</p> <p>A further disadvantage of option B is that it advocates urban sprawl in many different parts of the district. In addition to the problems of pollution and congestion already highlighted this encroachment on to the countryside will inevitably result in the loss of valuable agricultural land as well as natural habitats and would seem to contradict the council's overarching principle of "protecting and enhancing green infrastructure" (LPR, section 5.4, paragraph c vi, p22).</p> <p>Although it is understandable that many of the residents affected by option A will be deeply unhappy by the proposals this is clearly to be preferred to Option B as the new infrastructure and proximity to the economic opportunities of Birmingham and the Black Country will bring many advantages to the district as a whole.</p>
	LPPO2264	Option B	Object	<p>I write in relation to the Local Plan Review Consultation for Spennells estate in Kidderminster. I would like it known I strongly object to Option A and Option B.</p> <p>I shall outline my reasons below:-</p> <ul style="list-style-type: none"> • There will be an increase in traffic, noise and pollution from cars. This will have a detrimental effect on our mental health and wellbeing. Unsafe for our children to play out. • There will be an increased pressure on local schools. The class size will become too large and there would be fewer resources available to the students. Parents will have to bring their children to school in their car; again which will have an increase in pollution. • There is a good variety of wildlife in the area which will be lost, that nest on the fields i.e. Linnets, Skylark, dormouse etc. Wildlife should be protected. Also a lot of the trees on Spennells have preservation orders on them. Impact on the wildlife which feeds and

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				<p>grazes the land is to be protected.</p> <ul style="list-style-type: none"> • It will have a loss of agriculture land which is of a good quality. • There is a public right of way on these fields which would be lost, which would contribute towards our mental health. • There would be a large increase in pressure on already stretched services for Doctors surgeries, hospitals, dentists and opticians, school and nursery on Spennells. • These fields are an important/integral part of the Spennells estate as a lot of people use the fields in a variety of ways. For instance, just going out for a stroll, walking their dog, riding/training their horses, children playing, running/jogging training, to recuperate from illness, exercise and interaction with friends for a walk and chat. • There is already an issue with traffic trying to get off Spennells during the day, this new development will only make matters a lot worse, more accidents can occur. There will be an increase in noise and car pollution which again has an effect on mental health. Extra pressure on our roads, more potholes to fill in after winter, heavy congestion. • Loss of internet speed and quality. • Extra busses and traffic which will be a safety issue for adults and children alike. • There will be drainage issues as the fields would be a good resource for a soak away, showers will lose pressure.
	LPPO2403	Option B	Object	<p>Prefer Option A which will bring much needed infrastructure improvements /job growth and other developmental benefits/investment in the area in terms of new businesses/other types of facilities and serve a greater proportion of the population than dispersed development of Option B.</p> <p>A new Kidderminster Eastern Relief road will ease congestion but Option B will bring no new benefits and worsen current traffic congestion in Bewdley/Stourport esp. Bridge area.</p> <p>Impact on emergency vehicles/rat runs could develop.</p>

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				<p>Pedestrian safety/lack pavements.</p> <p>Spoil views/peace and quiet of the countryside/impact on recreational use/loss of agricultural land.</p> <p>Impact on council's conservation policy lists</p> <p>Already pressures on medical/educational provision would be easier to provide in bigger developments.</p> <p>New incomes may commute so provide housing where road and public transport improvements can be provided.</p>
	LPP02404	Option B	Object	<p>Support for Option A/object to Option B as it is unsustainable in the local area and is detrimental to the local community.</p> <p>Option A: New, much needed infrastructure improvements to serve more of the population than Option B which could impact on emergency vehicles/cause rat runs on narrow roads affecting pedestrian safety/loss of recreational land/views/agricultural land. Pressure upon medical/educational provision and few new job opportunities as opposed to Option A which may encourage job growth. More brown-field sites are available in and around Option B, rather than the greenfield area of Option A which may only attract commuters.</p>
	LPP04140	Option B	Object	I do not agree with any option that builds on Green Belt.
	LPP04066	Option B	Object	<p>Neither Option that you offer is totally consistent with the points made above and clearly I have concerns about both.</p> <p>I welcome the fact that the Town and District Councils have justifiably rejected the Gladman Appeal and their speculative proposals. But if they are approved what then? - surely we would not want to increase the damage done to our towns by their success by pressing ahead with</p>

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				either of these options -particularly Option B which would have even greater and adverse effect on Bewdley and Stourport and their green surroundings.
	LPP04023	Option B	Object	Option B should be rejected.
	LPP03858	Option B	Object	<p>The expected travel time 10 minutes, the actual travel time was 25 minutes. The cause of the long traffic queue from the top of Dunley Road into town? There were no roadworks, the delay was purely down to the volume of traffic trying to move through Stourport. This was not a one-off event. It is not unusual for there to be long queues trying to cross Stourport bridge.</p> <p>If option B is selected, what plans are proposed to manage the extra traffic that is bound to arise with hundreds more houses expected?</p> <p>What plans are there for managing the fact that one of the proposed sites in Areley Kings lies on what was once marshland and is at the lowest point of the water table?</p>
	LPP03789	Option B	Object	Plan B has disadvantages, inc. access to facilities/traffic congestion.
	LPP03657	Option B	Object	Object to option B.
	LPP03659	Option B	Object	Object to Option B
	LPP03275	Option B	Object	I object to plan B and “Core sites”.
	LPP03224	Option B	Object	<p>I think that by dispersing the developments it will bring major problems with infrastructure in particular, the roads and traffic congestion over the river bridges in Bewdley & Stourport. For example, the increased traffic from the proposed developments at Areley Kings will only increase the known traffic congestion over the bridge and exacerbate the air quality issues in Stourport town centre/the Gilgal etc.</p> <p>The other issue is medical & educational services. These would be family houses and would undoubtedly increase demand for school places and doctor’s services –both already under</p>

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				pressure in both Bewdley & Stourport.
	LPP04498	6.56	Object	Q 6.55 and 6.56: I wished to comment again on how the options for redevelopment have been unfairly portrayed. Question 6.55 outlines benefits of Option A before asking for an opinion whereas question 6.56 outlines the disadvantages of option B before asking for an opinion. In order for this document to fairly ask for people’s opinions without swaying their judgment both options should be weighed up with advantages and disadvantages before asking for the opinions of residents. The document should be impartial and allow residents to create their own opinions and decisions independently and without influence from the council.
	LPP04447	Option B	Object	<p>Please note my objections to both Option A and Option B. First of all, there are areas common to both Options, on Green Belt land. Does this mean these cannot be questioned?</p> <p>My objection is not that Kidderminster needs no additional housing, but Green Belt land should not be used:</p> <ul style="list-style-type: none"> • Green space is important for emotional and physical wellbeing • Green space is a diminishing resource and should be protected. Once it is gone it cannot be regained • Loss of farmland will lead to insufficient food for the Country – imports are costly and cannot be guaranteed, especially with Brexit looming • Building on undeveloped land causes flooding. When land is covered by concrete/tarmac the surface water runs off and has to go somewhere. Broadwaters is already prone to flooding by the park, building at the top of the hill can only make this worse • Green spaces and farmland are important habitats for wildlife, some species of which are rare/endangered. From my garden I have personally seen deer, grass snakes and bats. Bats are a common sight in the evening – during the last few years I have found a dead long-eared bat and a horseshoe bat in my garden so I know for certain that those species live in the Hurcott area.

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				<p>Kidderminster’s infrastructure cannot cope with this expansion – schools, doctors, dentists and roads are insufficient. Numerous schools in the town have been closed over the last 10-15 years – presumably the Council decided they were undersubscribed. Which is the mistake? Short sighted decision then or the apparently imminent population explosion now?</p> <p>Kidderminster Hospital has been downgraded. The closest A&E department is now a 45 minute drive from the town. This will cost lives in times of emergency.</p> <p>Urban sprawl on the scale proposed is not in keeping with Kidderminster’s semi-rural character. The size of development planned for the north east side of town is massive – 1100+ houses in a tranche will completely alter the character of the town and destroy Hurcott Village, spoiling a historic area forever. The roads around the Park Gate public house, Hurcott Lane and Birmingham Road are already dangerous with numerous accidents occurring. The massive increase in traffic which would result from these plans would worsen the accident rate and cause gridlock. The Clensmore development has made the Horsefair congestion much worse as no change to the road system was included. Further development on this side of town will only add to this.</p> <p>Properties on the Silverwoods development remain unsold; why is there now a need for such massive development when there appears to be insufficient demand already? This huge building project was supposed to solve Kidderminster’s housing needs for the foreseeable future. Once again this contradicts decisions made by the Planners. Was the mistake then or now?</p> <p>There are not enough jobs in the area to support this huge influx of people. This will render new developments commuter ghost towns and increase traffic on main roads.</p> <p>I believe Kidderminster should use all of its brownfield sites before any further destruction of green sites is even considered. There are numerous factory sites and sites where schools have been closed – apparently these schools were not required but now they are needed again to support the massive expansion plans! The site at Sion Hill has planning permission but is still lying</p>

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				<p>derelict. Crown House in the town centre is an eyesore and could be used, as well as the plethora of empty shops and offices in the town. This would rejuvenate the town centre; at the moment it is dying.</p> <p>To summarise, I do not agree with Plan A or Plan B. I believe there is no need for such urban expansion.</p>
	LPP04378	Option B	Object	I am strongly opposed to the Options suggested. The district Council is not trying hard enough to use the brownfield sites that are available.
	LPP04385	Option B	Object	I have to object as neither are viable options. Option B is totally unsustainable in that it places a lot of additional development the wrong side of the river in Stourport-on-Severn, creating increased traffic pressure on the bridge, pressure on existing schools in Areley Kings and there is little provision for shopping nor any medical provision that side of the river. With no alternative river crossing or by-pass in prospect, this cannot be a serious proposition as the existing infrastructure cannot sustain further development.
	LPP04389	Option B	Object	None of these options but another option
	LPP04395	Option B	Object	Object to option B, lack of infrastructure and to the use of any Green Belt land.
	LPP04410	Option B	Object	<p>Object to option B as its Green Belt; brownfield sites should be considered first. Local infrastructure - roads, traffic, schools, doctors insufficient/local hospital has no A&E.</p> <p>Kidderminster town centre is worst it's ever been half the shops are empty/rates are high.</p> <p>Houses could be built on former Glades old site, Park Lane, Mill Street, the old PO and above the shops in the town centre. As £1.4 million was spent on renovating 3 derelict cottages in the Horsefair then we should do so before touching Green Belt.</p>
	LPP04413	Option B	Object	I do not support option B. I would urge you to consider the requirements of local residents,

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				rather than those of large developers in this plan. As well as the implications of destroying the local countryside, which is well used and loved by the local community. Have a look at brownfield sites first.
	LPP04426	Option B	Object	I object to the B proposals as you are putting forward an option to build on prime farming land, which has very diverse wildlife on it, (including protected species such as bats, badgers and great crested newts), and also concentrating too many houses on the east of Kidderminster, overwhelming the existing communities which could cause social problems further down the line.
	LPP04427	Option B	Object	My objections relate to Option B and the flawed way in which the figure of houses required has been arrived at. I am in favour of utilising the use of Green Belt only as a last resort. I feel we are far from a last resort and that this area just does not require a volume which cannot be met by utilising brownfield sites both identified already and also ignored.
	LPP04433	Option B	Object	Object instead re use of Brownfield sites and town centre rejuvenation.
	LPP04435	Option B	Object	I am writing to strongly object to the building of extra housing as explained under the draft Local Plan Preferred Options A and B. My reasons are as follows: <ul style="list-style-type: none"> • The population of Kidderminster over the last few years has remained fairly static and this proposal will unnecessarily attract more people into a market town that is currently ill equipped to handle such an influx. • Both Options will involve the loss of a tremendous amount of Green Belt and agricultural working farm land. Option A would be far more disastrous, and would also result in the loss of wildlife in the nearby woodland areas. I believe the Council has a duty to protect these Green Belt areas and the wild life that lives there for future generations. • Loss of local footpaths and bridleways, where many of the local residents and indeed schoolchildren spend recreational time, and indeed is the very reason why many people

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				<p>have chosen to live here!</p> <ul style="list-style-type: none"> • The building of houses under Option A, and to a lesser extent Option B, will cause the loss of the natural break from the other nearby communities, creating an ugly urban sprawl and eat into the lungs of Kidderminster. Furthermore, additional housing would increase the Carbon Footprint. • Heavy traffic on local roads which are not suitable for the amount of housing proposed. They are always in a poor state of repair which can only get worse, requiring additional Council spend. • The proposed housing is situated too far for most people to be able to walk into town so additional bus routes would be needed. • There will be an over capacity for local schools, doctors and hospitals. • At a time when the nearest fully functioning hospital is already stretched to capacity and under special measures and the local Kidderminster hospital is operating as a “drop in centre”, what guarantees can the Council make that the necessary and sufficient amenities for healthcare would be actually provided? • With BREXIT looming and the uncertainty that it will bring to the ability to forecast public spending, how can the Council justify increased expenditure on infrastructure and services necessary to support an expanded community, without jeopardising their ability to remain in office? • What Job opportunities are available for an increased population in a run down and depleting Kidderminster, where shops and businesses are closing at an alarming rate? Could this mean that eventually people will want to move away from Kidderminster to seek employment, ultimately defeating the object of attracting them there in the first place? <p>I urge the council to throw out both Option A and B, not to destroy beautiful Green Belt and wildlife areas that can never be replaced, and to spend the money primarily on regenerating a rundown Town Centre. However, if it is proved to be a definite need for additional housing, then reluctantly Option B would be my preference.</p>

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	LPPO4738	Option B	Object	Do I prefer Option A or B? The immediate answer is neither. The amount of land taken up by these two proposals especially the core sites is too extreme. The amount of additional infrastructure required for schools, health facilities etc. looks from this perspective to be too costly and will never be completed. Where are these additional schools or Form Entry (not sure what this means) to be built within this new development without compromising all the other factors such as green infrastructure, transport, water and sewage etc? What about the unique place and all the other considerations?
	LPPO3182	Option B	Support	It would involve the loss of less Green Belt land together with all the wildlife that goes with it It would deprive the locality of less good quality agricultural land A dispersed strategy is good as the affect of new development would be spread more evenly around the district
	LPPO3081	Option B	Support	I am writing to notify you of my preference for Option B with regards to the two options for the proposed housing development in Kidderminster. I am concerned that the preference for Option A (involving the removal of protected green-belt) is not the best course of action for Kidderminster or its existing population. Furthermore, the scale of the development seems to have been based on pre-recession data during stronger growth, and as such does not represent the best interests or realities of the area. There are plenty of such alternate locations waiting for development in the Wyre Forest area, which have the added benefits of existing infrastructure. This in turn would result in an injection of demand to the stagnating town centre economies. Option B details the type of change that would benefit the local area in the long run. Developing green-belt must always be a last resort. It is often argued that the UK needs more housing to meet the historically growing demand, but before merging towns like Kidderminster with villages like Stone and Stanklyn (destroying vital countryside and farmland in the process) all

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				<p>other options must be exhausted. In this case, other options <i>are</i> available and are clearly favoured by the majority of the local electorate. Last year’s Brexit vote set in motion changes that are already impacting the UK population growth and industry and the UK’s agricultural sector will need to be maintained and developed in order to thrive under these challenging times. Removing a belt of highly productive land from Kidderminster is economic self-harm in these circumstances, not to mention the negative health consequences of destroying available countryside and replacing it with new roads. Developing central urban areas makes much more sense on all counts.</p> <p>Aside from the ecological, agricultural and health benefits mentioned above, there are practical benefits of developing brownfield sites. In the past, these sites were part of the life-blood of our towns—connected to the arteries, nerves and hearts of areas like Kidderminster. The local economy is prepared to quickly reconnect with transport links and infrastructure (physical and digital), ready to resuscitate then regrow these brownfield sites. The aforementioned injection of much-needed demand in recently neglected areas will benefit towns like Kidderminster, building momentum in an area that has struggled since the great recession of 2008. Building on Birmingham’s recent success, train-linked Kidderminster can then ensure that new money is spent locally, rather than bleeding off into places like Worcester (especially likely given that Option A is located on the Worcester road).</p> <p>My fear is that any preference for Option A is clearly not in locals’ long-term interests, irreparably damaging Kidderminster. Please make the right choice and select Option B.</p>
	LPPO3060	Option B	Support	I support option B, because it already has existing development, it would have less impact on newly housing and there are schools which can support further development in the area.
	LPPO3167	Option B	Support	I would support choosing Option B.
	LPPO3171	Option B	Support	The route seems to cause the least disruption to roads and the lesser burden to other infrastructure such as medical facilities.

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				<p>A new school would not be needed; there are spaces available in schools in Wyre Forest.</p> <p>The money would be better spent on:</p> <ul style="list-style-type: none"> • Reducing rents and parking charges to attract new business and visitors • building an attractive cinema and bowling alley • Providing free shuttle buses to and from successful sites such as SVR, Safari Park and Leisure Centre. <p>Stourport and Bewdley need additional bridges for traffic and pedestrians.</p>
	LPP020	Option B	Support	Supports Option B. Once Green Belt is lost it is gone forever. There may not currently be enough brownfield sites to meet projected needs, as time goes by, and ways of trading/manufacture change, who can say there will not be more available.
	LPP023	Option B	Support	Supports option B
	LPP0112	Option B	Support	Option B' is my preferred choice, if sufficient brown field sites can not be found
	LPP0189	Option B	Support	I think Option B is the better solution, giving a more even distribution of housing around the whole of Kidderminster, and regenerating the old ugly derelict buildings around the area making Kidderminster a more pleasant place to live.
	LPP0678	Option B	Support	<p>Reluctantly support Option B but re-examine all brownfield sites For example:</p> <ol style="list-style-type: none"> 1. Transform redundant buildings, behind Matalan to vibrant, affordable apartments 2. Are industrial units on the “ex British Sugar” development needed - there appears to be excess capacity at Easter Park and adjacent Trading Estate. Could additional housing be made available on this site? <p>If small, commercial unit capability is required convert the Kidderminster Town Area, ex-Woolworths location (with many adjacent empty shops), to a Trades and Skills area; i.e. a</p>

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				<p>location where businesses can pursue their trades, but also demonstrate them to the public/visitors? Kidderminster Town Centre could become a balance of retail, entertainment (bars, cafes) and Trades/Skills. A centre for educational (college) and vocational training.</p> <p>Could the area next to Tescos in Stourport be used for apartments/housing?</p>
Stone Parish Council	LPPO1159	Option B	Support	Stone Parish Council supports Option B.
Chaddesley Corbett Parish Council	LPPO1029	Option B	Support	<p>Parish Council supports option B. Impact on western settlements could be reduced by using option A site near Lea Castle. This may assist with plans for relief road. Plan appears to propose a relief road running through a new residential estate which would make it an unattractive place to live. Large eastern extension would have to be carefully controlled so that it made a positive contribution to quality design and local distinctiveness. Consider that option B would give greater opportunity for quality design and local distinctiveness.</p> <p>Both options will have major impact on traffic volumes heading east out of district. Junctions at Mustow Green and Hagley will need improving. Detailed discussions will be required with County.</p>
	LPPO2255	Option B	Support	<p>Under Option B with the development of the Lea Castle site where the infrastructure is already in place, if 1000 homes were built a new school would be built to accommodate the children from the area. Heronswood School is unable to increase in size as it has no available land around. Lea Castle site would also be somewhat screened with the woodland areas already present which would have less impact on the area.</p> <p>For my reasons given I oppose option A and favour option B</p>
	LPPO2261	Option B	Support	I believe the best policy for Wyre Forest would be Option B where the proposed building etc. would be confined to infill and keeping the current boundaries of the area.

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				I favour Option B as I think all of Wyre Forest should share the increase in housing but that the Council should firstly build on all available brownfield sites and insist on regeneration of empty properties into housing. They should lobby Parliament to change any laws to ensure landowners do not keep empty properties which are detrimental to the local area e.g. Crown House and Worcester Street. All planning permission already granted to developers should be developed quickly and without delays, planning permission should be given with a clause that building must be completed within a period of time for instance 3 years.
	LPP01876	Option B	Support	We feel strongly that it should be Option B. Option B is less extreme, less impact in any one area. .
Spennells Against Further Expansion	LPP01743	Option B	Support	Of the two choices in the Local Plan we would choose Option B because: <ul style="list-style-type: none"> • Less Green Belt land would be used • Ability to build a greater number of houses, in areas where they are needed for local expansion. • The dispersed nature of the development would result in less pollution and less strain upon Kidderminster’s existing infrastructure. Spreading development would serve the needs of expanding local communities by creating the potential for more housing development, but without concentrating the development to the detriment of the Green Belt cushion between the Wyre Forest and the West Midlands conurbation.
Summerfield Against Land Transformation	LPP01624	Option B	Support	We reluctantly support Option B because of the lower Green Belt land take and the lesser disadvantage to the Summerfield (and Spennells) community.
	LPP03049	Option B	Support	<ul style="list-style-type: none"> • Option B uses less Green Belt land. • Option B plans for a larger number of houses, in areas where they reflect the local need. • The dispersed nature of development in Option B would result in less strain upon

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				<p>Kidderminster’s infrastructure and allow other communities to retain their own infrastructure to the benefit of their residents.</p> <ul style="list-style-type: none"> Option B does not require the additional policing costs suggested in section 4.4.9of the WFIDP.
	LPPO3057	Option B	Support	<p>I believe there are a number of Brownfield sites in Kidderminster and the surrounding areas that could and should be used first.</p> <p>Kidderminster town centre itself has a number of opportunities for housing development and the existing infrastructure to support the building of residential units.</p> <p>New housing in the town centre could breathe new life into the depleted high street rather than moving people further away onto Green Belt land.</p>
	LPPO3026	Option B	Support	<p>My opinion is that we should adopt Option B, the continued development of brownfield sites across the district as and when required.</p> <p>Conclusion: There is too much uncertainty to justify the irrevocable destruction of our Green Belt.</p> <p>Therefore I believe that Option B with the continued development of brownfield sites across the district as and when required is the correct decision.</p>
	LPPO2997	Option B	Support	<p>I prefer Option B as it uses 20% less Green Belt. I also believe that that there are other avenues which have not be considered and have been missed from your documentation without clear explanation. I also believe it is important to look at the actual figures in terms of population and what this area needs.</p> <p>I recommend Option B is followed utilising brownfield sites as a priority; only then that Green</p>

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				<p>Belt is used once brownfield sites have all been developed and exhausted.</p> <p>It was also pleasing to hear Councillor Ian Hardiman on TV state that the Council had brownfield sites for 3000 dwellings, so the use of Green Belt should be a last resort. It was important to hear this and to prioritise these areas as approximately 3000 dwellings meets the need for this District. *3582 dwelling as calculated by using the SNPP projections would mean that brownfield sites can accommodate 83.74%.</p> <p>It was also encouraging to read that in your table for aims and objectives (3.02) that the District does want <i>"to protect and support the role of Green Belt through a strategic review"</i> so to lose the Green Belt agricultural land adjacent to the Spennells estate would be a substantially larger in option A, than that of Option B and with the projection figures of dwellings that can be sourced via brownfield sites Option B is more favourable and would <i>"identify limited strategic Green Belt release to enable the delivery of the plan"</i>.</p>
	LPPO2909	Option B	Support	<p>Prefers Option B as it uses 20% less Green Belt.</p> <p>The plan appears encourage building on the Green Belt, attracting commuters from Birmingham and Worcester.</p> <p>The road infrastructure needs addressing as Kidderminster is frequently gridlocked during rush hour, especially at the Wilden Lane/Worcester Road roundabout, which has been caused by the new link road.</p>
	LPPO2985	Option A	Support	I broadly support Option A because I feel that the infrastructure gains are very important.
	LPPO2915	Option B	Support	<p>I write with regard to the above proposal with regards to the Green Belt land surrounding Spennells estate.</p> <p>In the report we are asked whether we prefer Option A or B. My opinion is that we should go</p>

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				with Option B. Option B would use less Green Belt land and there are ample brown field sites within the Wyre Forest area and especially within the Kidderminster town centre, which could be used for housing.
	LPPO2931	Option B	Support	Option B, a more dispersed use, would mean catchment areas for schools doctors etc would not be pushed past a potential breaking point. There are many viable brownfield sites and also the half derelict town centre to consider.
	LPPO2950	Option B	Support	<ul style="list-style-type: none"> • Uses 20% less Green Belt land. • Does not involve Green Belt graded 'very good'. Towns & Villages to retain their historical characteristics • Less likely to attract overspill from B'ham/Solihull, therefore genuinely can be said to meet local needs across the District. • Will not cause the major traffic congestion that will occur with Option A • Will not require the construction of the essential Option A relief roads • The various housing developments can run concurrently across the District, without major disruption, achieving the housing requirements more quickly.
	LPPO2871	Option B	Support	I support Option B
	LPPO2829	Option B	Support	Do the benefits of dispersal strategy outweigh congestion in town centre?
	LPPO2678	Option B	Support	<p>If the development of Wyre Forest (WF) is to be considered as a combination of residual, commercial and industrial phases, whilst still maintaining some credence to backing the surrounding 'Green Belt' (GB). Then in any statutory planning exercise there must be consideration, <u>as a first priority</u> given to any existing urban/'Brown-field' site (BFS) that has become available and apparently surplus to requirement.</p> <p>Let us now assume that this previously used BFS has been serviced with communications,</p>

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				<p>drainage, power and water then the only restoration of such sites would be the requirements of an environmental impact study, minimal site groundworks preparation – (providing there was little/no contamination.) There is no potential similar servicing benefit with Option A.</p> <p>Since most of such BFS sites would attract domestic dwellings and maybe some small and medium enterprises (SME) then an increase in population/residents would invariably help to bring the town centres back to life. Another advantage would be that transportation improvements would not necessarily be at such a high premium, walking between services would be an advantage in the health of the populace as well. Use the developers to assist in the refurbishment of the centre of the three towns, we all know of developments that have had new roads provided to service their respective new properties. The hospital, three major GP's surgeries, train and bus terminals are all within walking distance in Kidderminster.</p> <p>When one considers the approximate annual requirement of 300 developments for the next 17 years spread over the whole district, there seems little need to go for the GB option, as proposed. Given that the BFS will only be able to absorb half of the statistical requirement, presumably over the 17 years, that is still circa 150 properties per annum. Which means that the '3 noted fields' adjoining the Spennells, is too big by far for the implementation of the annualised sum of developments over the 17 years. There must be smaller GB sites that could absorb the annualised requirement, that the 'numbers' seem to suggest. Without the impact that taking three adjacent GB fields, all to make a stretched Spennells, will have in that one area of Kidderminster.</p> <p>Which could easily be interpreted as the acquisition of three fields to take the planned development of 5500. If we now consider the size of development companies that have been named in the media then they could develop the three fields in well under 10 years. Which all of a sudden makes a mockery of 5500 house provision spread over 17 years in the WF, and changes the whole Local Plan to a Local Plan for the Development of Eastern Kidderminster specifically, so be honest if this is the underlying and probably the cheapest proposal say this is the preferred</p>

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				<p>option.</p> <p>It seems too easy to say what WFDC needs to appease some directive from Westminster and in the process overload the 'eastern' side of WF, when the need to develop the GB does not appear necessary in the time scale that the current study is quoting. This is where the 'Least Cost' option to WFDC or conversely being the recipient of the very best benefit package that could be extracted from the developers or other financing operation/ILA</p> <p>Given that the GB option would need the provision of the Eastern Kidderminster Relief Road (EKRR) from the A449 around Kidderminster to the A456, one has to wonder where the funding for that would come from. In which case all the other County Councillors would be arguing for own "Eastern Relief Road", that would likely take all of the 17 years to debate the funding of "Eastern Relief Road" wherever in the County it was going to go.</p> <p>So I say Option B – Development across the whole of Wyre Forest, is the way to go</p> <p>The facts are that since WFDC is apparently not in such a strong position, other than 'rubber stamping' any ideas of developing the whole of Wyre Forest that it will be forced to take the easy and cheapest option and disregard the rules that stipulate that communities should not be melded together, Spennells and Summerfield, Spennells and Stone. In other words load up the eastern side of Kidderminster and be done with it, all within one hit!</p> <p>I repeat develop the whole of WFDC – Option B</p>
	LPPO2581	Option B	Support	<p>As a resident of Stone Parish I am extremely concerned about the prospect of using greenfield land together with potential loss of wildlife habitat, in our Parish for housing needs, which will seriously add to unjustifiable urban spread.</p> <p>I therefore wish to register my objections to the Local Area Plan by selecting OPTION B.</p>

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				<p>I am at a loss to understand how the requirement for about 6,000 houses will be needed in the ensuing years especially in the present and indeed near to medium term future when the three towns forming Wyre Forest District are barely able to sustain employment levels as at present.</p> <p>The prospect of attracting new means of employment and therefore the sustainability and growth for the long term future in WFD, engenders a feeling of pessimism.</p> <p>Before all else certainly the needs for Healthcare, a viable Hospital with health care for all residents and the elderly, transportation and public services, roads infrastructure, Schools, Industry, commerce, retail, open space and leisure facilities, this with the background of an almost extinct Carpet industry a traditional employer of Wyre Forest residents.</p> <p>Any new housing certainly not at the proposed level could most probably be accommodated on brownfield site and via inner urban renewal and Core Option allocated land, surely when all of these sites are fully utilised, should there be a need to sequestrate greenfield land.</p> <p>Therefore I reiterate that OPTION B of the Local Area Plan is and should be the most sensible direction that Wyre Forest District Council must pursue.</p>
	LPPO2582	Option B	Support	<p>As a resident of Stone Parish I am extremely concerned about the prospect of using Greenfield land together with potential loss of wildlife habitat, in our Parish for housing needs, which will seriously add to unjustifiable urban spread.</p> <p>I therefore wish to register my objections to the Local Area Plan by selecting OPTION B.</p> <p>I am at a loss to understand how the requirement for about 6,000 houses will be needed in the ensuing years especially in the present and indeed near to medium term future when the three towns forming Wyre Forest District are barely able to sustain employment levels as at present.</p> <p>The prospect of attracting new means of employment and therefore the sustainability and</p>

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				<p>growth for the long term future in WFD, engenders a feeling of pessimism.</p> <p>Before all else certainly the needs for Healthcare, a viable Hospital with health care for all residents and the elderly, transportation and public services, roads infrastructure, Schools, Industry, commerce, retail, open space and leisure facilities, this with the background of an almost extinct Carpet industry a traditional employer of Wyre Forest residents.</p> <p>Any new housing certainly not at the proposed level could most probably be accommodated on brownfield site and via inner urban renewal and Core Option allocated land, surely when all of these sites are fully utilised, should there be a need to sequester greenfield land.</p> <p>Therefore I reiterate that OPTION B of the Local Area Plan is and should be the most sensible direction that Wyre Forest District Council must pursue.</p>
	LPPO2451	Option B	Support	<p>I am very much in favour of Option B for the following reasons:</p> <ul style="list-style-type: none"> • Flexibility. Dispersed development is more able to react to changes than one large scale development. • Diversity. Spreading the development across the district will allow Stourport, Bewdley et al to benefit rather than growing Kidderminster alone. • Environmental. We should be looking to reuse and redevelop rather than take away green field sites. Once they are gone, they will not come back. • Generational. If we are to keep young people in the district we need housing to suit them. Town centre would be ideal, and would contribute to town centre regeneration.
	LPPO2166	Option B	Support	<p>I do feel development does need to be spread out throughout Wyre Forest; not just on the eastern edge of Kidderminster which already has the brunt of the core housing. Hence, in addition to my other comments , I would choose Option B.</p>
	LPPO2329	Option B	Support	<p>I personally prefer Option B provided the brownfield sites are used first and a larger housing</p>

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				<p>estate is built at Lea Castle where there is currently some housing. Looking at the core development site in appendix A, an estate similar or of a similar size to Spennells could be built without causing too much intrusion on the approach to Kidderminster from Wolverhampton or Stourbridge. It would of course need careful planning. The area adjacent to the Stourbridge Road which is currently classed as Green Belt should only be reclassified as a last resort should the need arise.</p> <p>I therefore prefer Option B and object to Option A.</p>
	LPPO2296	Option B	Support	Benefits of a more dispersed strategy most definitely outweigh the disadvantages of not supporting the relief road or easier school provision.
	LPPO2366	Option B	Support	My preferred option is B
	LPPO4231	Option B	Support	OPTION B IS BETTER
	LPPO4178	Option B	Support	I feel that the District Council should adopt Plan B on the Kidderminster side of the river, where access from the main roads is a lot easier & people living on any development on these sites would be able if they wanted to easily walk into town to use the facilities.
	LPPO4150	Option B	Support	Support Option B sites as there is much less requirement for the use of Green Belt land.
	LPPO4070	Option B	Support	Therefore I support option B due to the fact that less Green Belt land is affected.
	LPPO3832	Option B	Support	I prefer Option B as it utilises 20% less Green Belt land and object strongly to Option A.
	LPPO3803	Option B	Support	<p>I object to the Council's strategy as evidence shows that the scale is unnecessary. I prefer Option B notwithstanding I object to the analysis leading to the unnecessary scale of development.</p> <p>The Council needs to think in other directions rather than to pursue an unwanted eastern bypass that would cause negative effects to outweigh any perceived benefit.</p>

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	LPPO3665	Option B	Support	<p>Option B is the preferred choice as this road will not be required and it uses less Green Belt.</p> <p>The benefits of a more dispersed strategy do outweigh the disadvantages of not supporting the relief road or easier school provision. More on brownfield sites.</p>
	LPPO3747	Option B	Support	<p>Regarding the proposed new housing development to the East of Kidderminster, I have looked at the relevant plans and consider that Option B is the better Proposal.</p> <p>I am also very pleased to see that there is a proposal to convert the 1902 built former Warehouse in Churchfields (opposite the CMS Dealer's premises) into housing apartments.</p>
	LPPO3776	Option B	Support	<p>Having studied the points behind the above review I would personally recommend that you support Option B.</p> <p>Plan B does seem more acceptable especially as promises have been made to improve the infrastructure.</p>
	LPPO3614	Option B	Support	<p>I would like to show that my preferred option to be Option B and also my objections to the LP and my views, on how it is a flawed document.</p> <p>So to clarify I am stating my preferred option to be OPTION B but I want it to be noted, I am objecting to all building including the core housing which features in both options, and to the Wyre Forest District Council Local Plan 2016-2034 as a whole.</p>
	LPPO3574	Option B	Support	<p>Option B has a lower concentration of dwellings and spreads the development over a wider area. This will have a lower impact on transport, schools and other local services.</p> <p>Option B spreads any increase in dwellings around the district, and concentrating particularly on the Lea Castle brownfield site for dwellings appears to meet the actual growth in population.</p>
	LPPO3475	Option B	Support	<p>This option will spread housing and employment zones around the area helping to boost the</p>

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				<p>economy.</p> <p>Local facilities such as doctors, dentists and schools in each town will then be able to absorb people more easily.</p> <p>People will also be able to integrate more easily into the local community rather than becoming a satellite estate on the outskirts.</p> <p>Option B will lead to shorter car journeys for people to travel to their work, schools and shops.</p> <p>More children being able to walk to school.</p>
	LPPO3398	Option B	Support	<p>Option B would be the lesser of two evils, if linked to the planned development for housing at the old Lea Castle Hospital site. This would involve far less Green Belt land having to be destroyed and would be very much fairer to spread new housing in smaller pockets around the district rather than dump it all alongside one already built-up area at Spennells.</p>
	LPPO3217	Option B	Support	<p>I support Option B as my preferred option, and oppose Option A, as option B requires the use of less Green Belt and is a far more dispersed development to allow more people to choose where they live in the Wyre forest.</p> <p>Many younger people and families are wanting the flexibility to live in the more vibrant, green and social areas of the Wyre Forest such as Bewdley, Stourport and Cookley, and live near friends and family, rather than move out to mass housing estates in Kidderminster. There is currently not enough affordable housing in these areas, which Option B would address.</p> <p>I support Option B albeit land at Captains Pool should also not be developed.</p>
	LPPO4532	Option B	Support	<p>I believe option B is more beneficial to Kidderminster and offers the opportunity to revitalise the town by removal of derelict / unused buildings and replacing them with housing either through the conversion of the current buildings or new build properties. The most obvious example is</p>

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				<p>resultant of the town centre moving down a street through the creation of Weavers Wharf which has left Worcester Street as an eyesore that gives a negative impression of our town. The building of housing on the land between Worcester Street & Bromsgrove Street (from Coventry St to Prospect Hill) & the demolition of the old Littlewoods & Woolworths buildings would bring people closer to the town, improve footfall for local business and at the same time clear away / rejuvenate a dead area of the town. I am sure as part of this process many other examples will be provided by residents of areas of the town that could be positively improved by open minded thinking around option B.</p> <p>The core housing plan combined with option B will have less of a negative impact on the area and careful consideration of how the core housing sites are utilised could reduce this impact further. The creation of a village on the Lea Castle Hospital site (core housing site) with more than the proposed 600 homes would spread the pressure on the area road network more evenly, reduce the need for unnecessary Green Belt development and provide the creation of a new community and business opportunity for local shops and services.</p>
	LPP04589	Option B	Support	<p>The Local Plan Review Preferred Options Document asks that we consider if we prefer Option A or B to cater for WFDC plans to accommodate increased population up to 2034 and the required housing and employment needs; and presumably the infrastructure needs including roads, public and private transport, schools, medical services, hospitals and policing.</p> <p>In broad terms the main differences between the two options is that:-</p> <p>Option A concentrates the vast majority of the housing towards the east of Kidderminster building on a vast amount of the Green Belt, making Spennells a “Super Estate”; where Option B disperses the build across Brown Field sites and Green Belt around Kidderminster, using approximately 20% less Green Belt.</p> <p><u>We of course support Option B but with a more realistic numbers of dwellings built as outlined in this objection.</u></p>

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	LPP04465	Option B	Support	<p>In relation to the proposed developments on Spennells Green Belt we are simply asked do we prefer Option A or B. In simple terms I prefer Option B as it uses 20% less Green Belt but you will see I also have other views/ideas.</p> <p>I recommend Option B is followed but Green Belt is only used after existing Brown Field sites have been developed.</p> <p>Other reasons for preferring Option B is that the Wyre Forest Infrastructure Delivery Plan (WFIDP) identifies additional Policing costs for Option A (section 4.4.9). Also, Option B does not need as much roadwork and section 7.0.12 of the same report says " the County Council judges that there will be a transport funding gap, as has been consistently identified in the previous version of the WFIDP back in September 2012 and in the IDPs of other Districts in Worcestershire." This will save £17.5m per the report.</p> <p>This is recommended in the WFIDP in section 3:</p> <p>"It should be noted that the expanded Lea Castle site within Option B is preferable to the smaller allocation identified in Option A. This expanded site has the potential to include additional development opportunities such as retail and a new primary school which will assist in providing a more sustainable development. This expanded site also allows the potential for a further access from the site onto the A451. However, it should be noted the A451 is a fast road that has historically suffered from a high accident rate so care would need to be taken when considering any access."</p>
	LPP04450	Option B	Support	<p>I feel that many of the aims for the future of our local area are good. However, while I appreciate the need for the local council to make adequate provision for future housing, both for local people seeking affordable homes (including those seeking social housing) and to provide some housing which will encourage higher wage earners to move into the area, I do not feel that Option A meets this need and that Option B would be preferable.</p>

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				<p>In the past the local council has shown lack of vision in planning. I fear that Option A shows further lack of vision and seeks to doom Kidderminster to becoming a dormitory town for Birmingham without the necessary infrastructure to support it. My views are not based upon 'Not in my backyard' but because I care about the preservation of Green Belt and realistic improvement of the local area for local people.</p> <p>My main concern is that presenting developers with the opportunity to build upon green field sites, currently outside of the Green Belt, will lead to urban sprawl to the southeast of Kidderminster, while brown field sites within the area remain undeveloped.</p>
	LPP04451	Option B	Support	Preference for Option B.
	LPP04414	Option B	Support	Supports option B.
	LPP04302	Option B	Support	I think Option B is preferable
	LPP04306	Option B	Support	Option B would be less impact in the area as it is mainly infill on areas already surrounded with properties and buildings.
	LPP04309	Option B	Support	I choose Option B.
	LPP04262	Option B	Support	<p>Prefer Option B.</p> <p>The dispersed strategy would have less impact but there have already been concentrated development of housing in The Horsefair, the Sugar Beet Site, Stourport Basin. Kidderminster would struggle to successfully become richer since it is further from motorways and transport routes. It is the semi-rural/rural nature of the town and housing which appeals to newcomers. School provision must always have the ability to fluctuate to demand for places.</p>
	LPP04292	Option B	Support	<p>Supports Option B:</p> <ul style="list-style-type: none"> It offers sufficient housing and commercial/industrial development opportunity to meet

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				<p>the needs of the District with the least impact on the environment, agriculture and infrastructure.</p> <ul style="list-style-type: none"> • It has a lower concentration of dwellings, spreading the development over a wider area, which should have a lower impact on transport, schools, and other services. Being more widespread covers the catchment area of additional schools. • It uses less Green Belt and agricultural land and more brownfield sites such as the old Lea Castle Hospital site. • It is less likely to result in loss of local identity and merging of towns/communities, due to the wider spread of housing development.
	LPP04640	Option B	Support	<p>I prefer Option B as it uses 20% less Green Belt with comment as follows:</p> <p>Option B does not need as much roadwork</p> <p>In the Green Belt review some of the assessment is wrong and coalescence will occur if Option A is pursued.</p> <p>The WFIDP identifies additional Policing costs for Option A. Large estates have evidenced increased anti social behaviour/crime rates acknowledged in the WFIDP but in the Local Plan consultation.</p> <p>The WFIDP and the Local Plan are very light on the provision of medical services.</p> <p>It is recommended the expanded Lea Castle site within Option B is transferred to Option A. Should Option A be chosen I support the more sustainable Lea Castle site to inc further access</p>
	LPP04627	Option B	Support	<p>Option B would be a better proposal as it spreads the houses around and not pushing Kidderminster houses further away from the town centre which would mean cars would be required to get into town as opposed to walking. Why does Kidderminster need so many new</p>

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				houses?
	LPP04759	Option B	Support	Access to other Green Belt areas identified as 'core' sites included in Option B, between Stourbridge Road and Bromsgrove Road can be easily accessed, at a fraction of the cost, (a) from Stourbridge Road and/or Birmingham Road, and (b) from Birmingham Road (via a new junction on Husum Way opposite Shakespeare Drive) and/or via the Stourminster School site. Neither of these potential areas of land, albeit existing Green Belt, would require a major trunk road completed to make them suitable for development.
	LPP04773	Option B	Support	I believe the best policy for Wyre Forest is option B where the proposed building etc would be confined to infill and keeping the current boundaries of the area. Option B is preferred as all of Wyre Forest should share the increase in housing. For the valid reasons stated it is my belief that any proposed building should be kept within the footprint already here, my preference is option B
	LPP04712	Option B	Support	<p>I do not approve of any development of the Green Belt and it is government policy to protect the Green Belt except in exceptional circumstances.</p> <p>Having read the information concerning economic social and environmental issues, I feel that on balance Option B would be the better option for future developments in the Wyre forest.</p> <p>Firstly, in relation to economic issues, I note that there has been a reduction in employment opportunities in the area, due to decline of traditional manufacturing industries. The static population growth and a high degree of economic dependency due to the ageing population, together with a low level of in migration, have produced the need to attract an economically active population to the area.</p> <p>If this premise is correct i.e. that the district needs to attract economically active commuters from other areas to address this imbalance and the assumption that they are less likely to have found employment in the local area than in Worcester or the West Midlands conurbation, then of the two main sites proposed Option B would be much more suitable. The site to the south of</p>

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				<p>Stourport would give access to the main roads to Worcester without passing through Kidderminster and furthermore it is not in the Green Belt. There are only two short stretches of footpath in this area to the south west of the B4194 and access to wooded countryside of Areley and Ribbesford Wood would not be obstructed. The other site to the north of Kidderminster along the A451 would also unlikely to add any extra through traffic, as it would attract commuters bound for Halesowen, Stourbridge and Birmingham. It also adjoins an existing core site around Lea Castle.</p> <p>The other sites in option B are small and could be adapted to local needs in Cookley, Fairfield and Bewdley, provided there are no environmental objections. This would take into account the needs of an increasingly elderly population throughout the district who would suffer if they were separated by long distances from their families and local services.</p>
	LPP04922	Option B	Support	<p>In relation to the proposed developments on Spennells Green Belt we are simply asked do we prefer Option A or B. In simple terms I prefer Option B as it uses 20% less Green Belt but you will see I also have other views/ideas.</p> <p>I recommend Option B is followed but Green Belt is only used after existing Brown Field sites have been developed.</p> <p>Other reasons for preferring Option B is that the Wyre Forest Infrastructure Delivery Plan (WFIDP) identifies additional Policing costs for Option A (section 4.4.9). Also, Option B does not need as much roadwork and section 7.0.12 of the same report says " the County Council judges that there will be a transport funding gap, as has been consistently identified in the previous version of the WFIDP back in September 2012 and in the IDPs of other Districts in Worcestershire." This will save £17.5m per the report.</p> <p>This is recommended in the WFIDP in section 3:</p> <p>"It should be noted that the expanded Lea Castle site within Option B is preferable to the smaller</p>

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				allocation identified in Option A. This expanded site has the potential to include additional development opportunities such as retail and a new primary school which will assist in providing a more sustainable development. This expanded site also allows the potential for a further access from the site onto the A451. However, it should be noted the A451 is a fast road that has historically suffered from a high accident rate so care would need to be taken when considering any access.”
	LPPO5075	Option B	Support	<p>I support the proposed Option B. Option B also removes around 48 hectares Less Green Belt than option A which is a very important and essential point that I wish to make. Green Belt should be protected wherever possible for future generations and current generations to enjoy and cultivate.</p> <p>The dispersed nature of the development would result in less pollution and less strain upon Kidderminster’s existing infrastructure which is already struggling to cope. This would spread the development more evenly around Wyre Forest, serving the needs of expanding local communities by creating the potential for more housing development and enabling people to choose where they want to live.</p>
	LPPO5076	Option B	Support	I therefore reluctantly support the proposed Option B, but request no Green Belt is removed or re-designated until every brownfield site already allocated in the plan in Kidderminster has been built on over the next 12 years or more.
	LPPO5081	Option B	Support	After the use of brownfield sites, I reluctantly support Option B. This uses less Green Belt land and it will spread housing and employment zones throughout Kidderminster, Stourport and Bewdley providing an economic boost to all the towns. It will also help people make shorter car journeys to work, school and shops leading to less congestion. I believe the three towns and surrounding rural areas can more easily absorb the numbers of extra people into doctor’s surgeries and children into local primary and secondary schools, rather than concentrate them on the Eastern part of Kidderminster. Hopefully more children would then be able to walk to school.

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	LPP04844	Option B	Support	Disperse development around the district to ensure an equitable spread.
	LPP04845	Option B	Support	My preference is for Option B.
	LPP04866	Option B	Support	Option B takes a substantial amount less of Green Belt land (circa 20%) than Option A. The Green Belt has a very important part to play in protecting the sprawl of towns into the open countryside, and your proposals (Option A) disproportionately focuses all housing on the eastern edge of Kidderminster, which would then merge it with the hamlets of Summerfield and Stone. This would also mean that many new home buyers would have 'no choice' of where they wish to live. Option B is more dispersed and gives buyers options to live close to family, friends, work and the area they choose to live.
	LPP05115	6.56	Support	<p>Prefer Option B.</p> <p>The dispersed strategy would have less impact but there have already been concentrated development of housing in The Horsefair, the Sugar Beet Site, Stourport Basin. Kidderminster would struggle to successfully become richer since it is further from motorways and transport routes. It is the semi-rural/rural nature of the town and housing which appeals to newcomers. School provision must always have the ability to fluctuate to demand for places.</p>

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	LPPO6	Site submitted - Yew Tree Walk, Stourport	Comment	Suggests site AKR/18 - Yew Tree walk, Stourport. It is immediately available available for increased levels of affordable housing or an entirely affordable scheme.
	LPPO7	Site submitted - Habberley Road, Kidderminster	Comment	New site submitted for consideration - Habberley Road, Kidderminster
	LPPO64	Alternative sites	Comment	Alternatives. There are lots of empty disused buildings around Kidderminster which could be developed, all the empty shops. Crown House, Industrial buildings built and still left empty and old units left empty because cheaper units can be found elsewhere. Why take farm land when there are so many derelict and unused places?
	LPPO101	Alternative sites	Comment	<p>Old Leisure Centre site, ideal for town centre living being within walking distance of rail and bus stations.</p> <p>Re-develop Horsefair area, which is a total disgrace to Kidderminster and is close to town centre.</p> <p>Alternative which appears to have been over looked is the Burlish Park Golf course which is now closed and is now a waste land. I am under the impression that Wyre Forest owns this land, although I might be wrong. This area is close to bus routes and employment areas and covers a large expanse of land.</p>
	LPPO111	Alternative sites	Comment	Developing Green Belt land should only be considered as a last resort if all other options have been exhausted. There are many Brownfield sites in the Wyre Forest area that should be considered first, like the closed down carpet factories, redundant warehouses that litter this area, the failed Wyre Forest golf club off Zortech avenue and the old Ceramaspeed factory, next door, which is far too large for any prospective manufacturer in this area to ever use again as a factory.
	LPPO122	Alternative sites	Comment	Consideration should be given to the land at Burlish, until recently a golf course.

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				This is poor agricultural land.
	LPPO183		Comment	Yes. Education provision will improve by more schools increasing capacity. Pollution can be solved easier by keeping Green Belt and appropriate tree planting. Improvements to traffic flow by appropriate route signage.
	LPPO198	Alternative sites - Town Centre	Comment	Our town centre is a ghost town, with the majority of retail units standing empty and the others mainly charity shops. A considerable amount of money was spent by the council changing the block paving and seating available, this has in no way regenerated the town centre or encouraged any new commercial enterprises either retail or otherwise. Would the land not be better used for creating housing?
	LPPO228	Alternatives - Kidderminster Town Centre	Comment	Kidderminster once a vibrant beautiful Town has dwindled and decayed. We <u>must think</u> of the future how best to make Kidderminster a pleasant & welcoming place to live. We should prioritise on improving and rejuvenating the town centre maximising areas such as brownfield sites first before we look to alternatives such as the fields around Spennells. I do not accept that we have to take green fields away.
	LPPO230	Alternatives - Kidderminster Town	Comment	Kidderminster town centre needs regeneration and improvement. I avoid its empty shops, graffiti and derelict buildings. Refurbishing and developing Kidderminster town would be an excellent opportunity to bring the once beautiful buildings back to life.
	LPPO310	Site submitted - Land at Puxton, Kidderminster	Comment	Suggests land at Puxton (WFR/WC/21) is included in the plan for housing.
Tooby Family	LPPO318	Site submitted - Land at Gaymore Farm, Cookley	Comment	There is no new land allocated for housing in Cookley Village up to 2034. This is not “robust” planning as the village has a considerable base population and the density of built form is unlikely to lead to many “windfall” sites even if the garden land policy is eased. Given that a Housing Needs Survey will be completed in

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				2017/18 it would be prudent to zone land for phased release. My clients site (WFR/WC/5) is preferable to the ADR as it does not close the strategic gap with the Lea Castle Hospital site (WFR/WC/15). By moving the Green Belt eastwards to the track alongside WFR/WC/5 a clearly defensible new boundary would be created.
	LPPO353	Site submitted - Land at Ridge End, Bewdley Hill	Comment	Suggests new site: East field near Ridge End, Bewdley Hill, Kidderminster
	LPPO427	Alternatives	Comment	<p>I object to Option A and Option B. Green Belt land should be used only as a VERY LAST RESORT.</p> <p>Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collaborate and collectively review overall brownfield site availability and plan housing development accordingly – decisions to build on the Green Belt should not be based on local authority boundaries.</p> <p>The 5 year rolling time frame for construction sites should allow for regular reviews of brownfield sites and enable changes to be incorporated into any plan,.</p> <p>The plan fails to recognise changes in shopping habits and unrealistically targets retail expansion and comparison shopping.</p> <p>Kidderminster has suffered from the failure to 'tidy up 'following the migration of Kidderminster town centre to Weavers Wharf and Crossley Retail Park.</p> <p>Retail premises and the courts building have been empty for 8 /9 years - the regeneration of such sites require radical solutions for alternative use that reduce any need to build on the Green Belt.</p>

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				<p>Unnecessary decisions are being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping (indeed, the plan itself demonstrates an inability to predict /understand short term population levels in the District).</p> <p>The plan fails in its stated aim to "to use a robust and up-to-date evidence base to ensure that the local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" . Instead it aims to justify what developers want to deliver rather than meet the needs of Kidderminster residents.</p> <p>Previous attempts to build an Eastern relief road have failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph road following the same route as the existing road from the Worcester Road through Mustow Green to the Birmingham Road - is it really a relief road at all?</p> <p>Whilst constructing a new school in the Spennells area appears attractive this (together with the promise of the 'relief road' shouldn't be the determining factor when opting to build on the Green Belt – other options should be sought.</p> <p>Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years. This situation equally relates to the areas covered by the LEPs identified in the plan.</p> <p>Whilst economic development in Kidderminster will be welcome - past experience shows this will take time – in the meantime people will continue to travel.</p> <p>Immediate need is for fresh radical thinking that optimises the use of brownfield sites throughout the LEP areas for residential use and enables Kidderminster itself to become a modern, contained and attractive town centre that incorporates</p>

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				retail leisure and residential opportunities rather than pursue outdated models from the past - 'mixed use' communicates little other than the elements of 'wishful thinking' so often reported in the local press over numerous years.
	LPPO464	Extended Lea Castle	Support	Why cannot the lea castle site as a whole be developed between the A449 and Stourbridge road to the east this would give good infrastructure in the form of transport links and as this is already a major site will have the drainage , site is not within the east and south site flood plains. This could be developed to be self sufficient as there would be enough houses built to justify a new primary school and have local amenities constructed .If the land to the east and west of the current proposals were also developed this would allow a sustainable bus route, have access to the local secondary school in Wolverley and provide a sustainable community.
	LPPO465	Extended Lea Castle	Comment	Why cannot the lea castle site as a whole be developed between the A449 and Stourbridge road to the east this would give good infrastructure in the form of transport links and as this is already a major site will have the drainage, site is not within the east and south site flood plains. This could be developed to be self sufficient as there would be enough houses built to justify a new primary school and have local amenities constructed .If the land to the east and west of the current proposals were also developed this would allow a sustainable bus route, have access to the local secondary school in Wolverley and provide a sustainable community.
	LPPO466	Alternative sites	Comment	Why are there no proposals for development on the North/West of Kidderminster? Can development opportunities be investigated at the rear of the existing Ferndale Estate?
	LPPO488	Alternative site	Comment	A good use of Lea Castle Hospital site would be a 540 unit development for elderly persons with their own Doctors surgery. This would limit the extra vehicles that come out onto the A449 which is just before a dangerous bend.

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	LPPO578	Alternative sites	Support	<p>I support building on Lea Castle for the following reasons:</p> <p>Large number of dwellings would be on existing brownfield ground, and not reducing the amount of Green Belt land around the town. The size of the area could be further increased by using the land up to Axborough Lane.</p> <p>A large number of dwellings could support a 2 form entry primary school, thus reducing the impact on the local facilities.</p> <p>It would be within the catchment of Wolverly CE High School and would positively impact the schools long term viability.</p> <p>It would be capable of sustaining a bus service</p> <p>It would support a village centre which would fall under Cookley parish, but would not put any burden on that community as it would be large enough to support its own park, village hall, school and shop.</p> <p>It would potentially be able to provide live-work units</p>
	LPPO689	Site submitted - Land off Crundalls Lane/Hoarstone Lane	Comment	<p>Suggests new site: Land off Crundalls Lane / Hoarstone Lane Bewdley.</p> <p>It is understood that the adjoining land owner (Grey Green Farm) would potentially release the land to the west in addition to this site.</p> <p>Two blocks of land with road frontage totalling 10.52ha. Hoarstone Lane is narrow but there is sufficient land/space for infrastructure improvements.</p> <p>Sustainable site, well located to existing residential, cycle and road networks, bus routes, shops and other services.</p>

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	LPPO691	Site submitted - Orchard House, Far Forest	Comment	Call for Sites Submission form: Orchard House, Cleobury Road, Far Forest
	LPPO38	Alternatives	Comment	<ul style="list-style-type: none"> • Woolworths Building • Two Court buildings • Derelict and empty factories within the town area • Empty shops no longer fit for purpose • The Glades site • Empty shops in Blackwell Street • Crown House • The old factory in Park Lane <p>These could all be knocked down and new housing built in the town.</p>
	LPPO51	Alternative site - Land at Aggborough	Comment	I believe that the Harriers are moving their ground to the practice grounds by Birchen Coppice, this will leave the ground by Aggborough for further development. This is a far better option as it is nearer the town centre and rail links etc.
	LPPO56	Site submitted - Railway Corner, Stanklyn Lane, Kidderminster	Comment	Suggests site at Railway Corner, Stanklyn Lane, Kidderminster. Both in isolation and also in conjunction with the preferred option A. We would like to propose 3 bungalows on the site.
	LPPO61	Strategy	Comment	<p>The question is whether you join the three towns of Kidderminster, Stourport and Bewdley together with the infrastructure already in place i.e. roads and other requirements well within reach. In the event you expand into the country side without the infrastructure it all costs more and once the country side has been built on its gone for good, whereas with a few exceptions little would be lost with the integration of the three towns.</p> <p>Take the request for building down Dry Mill Lane Bark Hill that could be built at the</p>

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				<p>top of Blackstone bank where water pipes are presently being laid. This in my opinion is far more acceptable to the community than the present request with all additional facilities required along with increased traffic problems for Welch Gate and Bewdley.</p> <p>Whilst high rise flats are not the in thing at present it is more than likely we will in the future due to the continued expansion of the human race we will build upward.</p>
	LPPO115	Extended Lea Castle	Support	<p>Would like to see a major expansion or the building on the Lea Castle site taking Green Belt right up to the A499 and across the Park Gate Rd in the field opposite. This would take less Green Belt and can use existing infrastructure. Potentially 2500 houses could be built</p> <p>I propose that a larger development is built on Lea Castle, taking in adjoining farm land. This will allow links with Wolverhampton Rd and Stourbridge Rd.</p> <p>A sizable development, say 2000 + houses, would be able to have a school , shops and maybe a bus route. This would prevent straining on existing services and also would feed into Wolverley High School, which is under subscribed.</p>
	LPPO191	Alternative sites - Wyre Forest Golf Course	Comment	<p>The land at Burlish, until recently a golf course, is also available and in my understanding already belongs to the local authority. In view of it being extremely unlikely to be taken over for use as another golf course as there is overcapacity in other clubs within an easy access to the district. This is very poor land for agricultural use, having a reputation of only able to grow stones. So no great loss to national food production. This land has not been cultivated since before the last war. However, the council record is not good in this respect, taking over fields used for recreation, to build new council offices. So much for the national obesity crisis. The plans only seem to identify only a small portion of this land as core. The</p>

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Company / Organisation	ID	Part of Document	Type of Response-	Summary of Response
				whole of the old golf course, not Green Belt land, should be fully utilised before considering other options.
	LPPO195	Alternative sites - Land Between Kidderminster and Wolverley B4190	Comment	<p>Option C?</p> <p>Land (No mans land) between Kidderminster and Wolverley B4190 maybe an option, perhaps further enquiries could be made into this.</p> <p>We appreciate difficult decisions have to be made especially in the light of the government guidelines, but surely it makes more sense to use less Green Belt.</p>
	LPPO196	Alternatives Selba Drive HELAA BHS/22	Object	I wish to object to the inclusion of “Land off Selba Drive, Kidderminster (referred to as BHS/22 - HELAA Reference Number) in the Local Plan Review. This land is a public amenity, the only open land used by very many living on the Habberley estate for a variety of purposes including dog exercise, children playing, family sitting/picnic area, various ball games (where every other small amount of sward is labelled “No Ball Games”). All other land surrounding this area is privately owned and not open to public access.
CORE11	LPPO243	6-57	Comment	The retired eastern by pass plan should be re-visited. Links to this route from new developments near Kidderminster would be feasible, and at the same time combine with tourism from the north, and relieve traffic into Kidderminster, plus combining with the already completed Bewdley by pass. A western by pass should also be pursued for the same reasons. If planned correctly much of any new road building could be done independently of new housing and or commercial operations.
	LPPO269	Extended Lea Castle	Support	<p>The current draft proposals in Options: A & B propose using only some of the land available at Lea Castle.</p> <p>My proposal would be to extend this by not only including both Options A & B but</p>

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				<p>also extend the site to land up to Wolverhampton Road and the rear of the Lea Castle site up to Axborough Lane. In addition further development along the western side of Wolverley Road towards Sion Hill linking up with the development of the disused Sion Hill Middle School site. In addition the old Sladen Middle School site on Hurcott Road has also never been developed since clearance and should also be considered.</p> <p>Advantages of these proposals:</p> <ol style="list-style-type: none"> 1. With the additional land proposed a sustainable community of around 2,500 homes could be created. 2. This community would be large enough for a new primary School. 3. This community being within the Wolverly High School catchment area it would positively impact on this schools long term viability. 4. This community would be large enough to sustain a Village Centre & local shops. 5. This community would also be large enough to sustain a bus service and live-work units. 6. Additional development areas to the North / West of Kidderminster should also be considered, such as the rear of the existing Ferndale Estate where over 200 houses could be accommodated and this area has local shops & a bus service etc.
	LPPO315	Site submitted - Land at Northwood Lane, Bewdley	Comment	<p>My client is disappointed that the site WA/BE/4 (land at Northwood Lane, Bewdley) has not been zoned for residential development. The land is not in the Green Belt and development would improve the landscape by removing existing structures. The site is within walking distance of facilities in Wribbenhall and Bewdley town centre. It is a sustainable location. Any increase in traffic would be very marginal. The site is perfect for low density “self-build” housing (3 or 4</p>

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				developments) within an overall Master Plan layout. My client asks that the site be zoned for this use.
Cory & Morgan	LPPO316	Site submitted - Land at Wilden Top, Stourport	Comment	My clients are disappointed that their site (MI/20- Land at Wilden Top) has not been zoned for housing. Wilden village has all the facilities to make it a “sustainable” location. If MI/20 was developed with MI/17 and MI/21, this would give a better outcome than sites west of the River Severn in Stourport (Option B housing site) as there would be less pressure on urban roads in Stourport and easier access to Kidderminster, Worcester and Birmingham.
	LPPO317	Site submitted - Land at Wilden Lane, Stourport	Comment	My clients own land on Wilden Lane. It is currently used for storage and business purposes. My clients and their children are Gypsies with a long history of residence in the Stourport area. My clients wish to create a 4 pitch private Gypsy site on their land. This would help meet the identified shortfall of 21 pitches between 2020 and 2034. My clients ask that their land be allocated in the local plan, shown on the proposals map and be removed from the Green Belt. If this request is met in the Deposit version of the plan (Feb 2018) my clients will move towards detailed designs and a planning application.
Trustees G W Hardwick	LPPO322	Site submitted - Land off Lowe Lane, Fairfield	Comment	There is no new land allocation for housing in Wolverley or Cookley during the plan period. Whilst it is acknowledged that affordable housing sites have been developed recently, it is not “robust” to not allocate any land for the 17 years to 2034. This is especially so as both communities have significant base populations and the density of built form is unlikely to lead to a meaningful number of windfall sites, even if the ‘garden land’ restriction is eased. Given that Housing Needs Surveys are to be conducted in 2017/18 for the area it would be prudent to zone the ADR’s for phased release for housing, including my client’s land in WFR/WC/22.
	LPPO323	Site submitted - Corner of Caunsall Road / Kinver	Comment	There is no allocation of land for new housing in Cookley up to 2034. This is not ‘robust’ as required by Local Plan guidance. A local Housing Needs Survey will be

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		Lane, Cookley		completed in 2017/18 and is likely to show unmet local demand for the plan period. My client's site on the corner of Caunsall Road and Kinver Lane is PDL benefitting from approvals 15/1069/FULL and 15/2056/CR. The attached drawing 3466-04A dated 6/6/17 shows that the requirements of the approvals can be met, in addition to 3 extra dwellings. This is an applicable 'windfall' site and should be removed from the Green Belt and zoned for housing.
	LPPO343	Alternative site suggestion	Object	<p>Response to Local Plan Review Preferred Options and Sustainability Appraisal Report (May and June 2017) in respect of the proposed non-allocation of site WFR/WC/10 - Land off Kimberlee Ave, Cookley</p> <p>The 2017 Objective Assessment of Housing Need Report has evidenced the overall requirement for 300 new dwellings per annum over the new plan period, which would total 5,400 over the plan period. Sites in and around Cookley have access to many services including Shops, Schools and a Doctor's surgery, good access to open space or sports facilities and therefore score highly for sustainability objectives. The Draft Plan identifies as a key principle that villages in the Rural East of the District are more sustainable than in the Rural West as they have more service provision and public transport</p> <p>As explained in the Development Strategy there is now a need to remove land from the Green Belt for both housing and employment development to support essential elements of the strategy. Under proposed Local Plan Review Preferred Options, three large sites near Cookley are proposed to be allocated. These sites are; WFR/WC/15 - Lea Castle Hospital, BW/4 - Hurcott ADR and WFR/CB/7, OC/4/5/6/12/13N, WFR/ST/1, FPH/27 - East of Kidderminster (N), all of which will require changes to the Green Belt boundary. Predicted benefits for these site options stem from the implementation of a Kidderminster Eastern Relief Road and the provision of sufficient, appropriately located education facilities but a question remains over whether these benefits will ever outweigh the disadvantage caused</p>

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				<p>by the large-scale of expansion to the east of Kidderminster.</p> <p>In the Preferred Options document which addresses the approach to the location of future homes, it is recognised the provision of small scale residential development, to meet specific local needs within the District’s rural settlements will be encouraged. In order to help the Council address the shortfall in dwellings, an additional option for the future development of such a site in this category; WFR/WC/10 - Land off Kimberlee Ave, Cookley should be considered.</p> <p>The proposed sites; WFR/WC/15 - Lea Castle Hospital, BW/4 - Hurcott ADR and WFR/CB/7, OC/4/5/6/12/13N, WFR/ST/1, FPH/27 - East of Kidderminster (N) do not adjoin the village of Cookley or Kidderminster itself. However, the site; WFR/WC/10 - Land off Kimberlee Ave, Cookley is better related to the existing village facilities at the village core than the proposed sites submitted Preferred Options document.</p> <p>The reasons given by the Council for not allocating the site at WFR/WC/10 - Land off Kimberlee Ave, Cookley are not made clear in the Preferred Options document. Parts of the Strategic Green Belt Study (AMEC 2016) and a more detailed Second Stage Green Belt Study (AMEC 2017) which forms part of the evidence base seem contradictory, in that on the one hand the Green Belt is fulfilling its intended strategic purpose but on the other, sites for some 2500 dwellings are to be allocated from within the Green Belt.</p> <p>Deliverability</p> <p>Following the initial feasibility studies and during the early stages of the emerging Local Plan, the site; WFR/WC/10 - Land off Kimberlee Ave, Cookley was advised to the Council to be considered for suitability of development. Should this site come forward, it is available for immediate development and would be deliverable for</p>

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				<p>housing to meet local needs in appropriate circumstances.</p> <p>Potential access into the site; WFR/WC/10 - Land off Kimberlee Ave, Cookley from either of three corners (NW, SW or SE) could allow a varied range of site design but the most likely would involve a standard cul-de-sac streetscape of at least 35 dwellings. The site is well located in terms of the road network and any road safety impact could be mitigated by accessing it over an existing service road, currently maintained by a statutory undertaker. The unacceptable impact of the nearby A449 Trunk Road for future occupiers would be mitigated by surrounding agricultural land and with development not possible where the Elan Valley Aqueduct runs adjacent the site boundary, a buffer would be created for some of the present houses. Existing hedgerow areas on the western and southern site boundaries could be retained and enhanced to screen the development from existing houses on Kimberlee Avenue and Brampton Close.</p> <p>Relationship with existing services</p> <p>The site; WFR/WC/10 - Land off Kimberlee Ave, Cookley is very well located in the village in relation to existing services, with a good range of services within a significantly lower walking distance than the proposed allocated sites; WFR/WC/15 - Lea Castle Hospital, BW/4 - Hurcott ADR and WFR/CB/7, OC/4/5/6/12/13N, WFR/ST/1, FPH/27 - East of Kidderminster (N). A Public Footpath passes along the western and southern boundaries of the site providing possibilities to link into this footpath network directly from the site itself. The footpath leads to the canal tow path and the local recreational area with various sports facilities including Cookley Sports & Social Club and play equipment. Adjoining the recreational area are two Primary Schools. These facilities can equally be easily accessed via Castle Road where again a choice of access exits via a Public Footpath linking to Lea Lane or the local roads themselves.</p>

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				<p>Within 600-700 metres of the site; WFR/WC/10 - Land off Kimberlee Ave, Cookley, the village offers a Doctors surgery, Village Hall, two Public Houses, Post Office, Church, Restaurants, Shops and Supermarket. The proposed sites; WFR/WC/15 - Lea Castle Hospital, BW/4 - Hurcott ADR and WFR/CB/7, OC/4/5/6/12/13N, WFR/ST/1, FPH/27 - East of Kidderminster (N) would involve walking approximately a mile from the closest point of the sites, which may, in reality, not be the access points available once a site layout has been drawn.</p> <p>Summary</p> <p>It is considered the proposed site; WFR/WC/10 - Land off Kimberlee Ave, Cookley is ideally placed to provide family housing due to its excellent access to a full range of local facilities, including local school provision and medical services and access to the Church.</p> <p>Adequate vehicular access could be provided to the site. The site also offers an opportunity to join onto the existing excellent public footpath network in Cookley village, with links via pathways and cycle paths to employment, education and retail areas. All dwellings would be within 400m of a bus stop reducing need to travel by car, thus promoting energy efficiency.</p> <p>As a small scale residential development, there will be no requirement to provide additional roads which would have a cumulative adverse effect on the Green Belt and increase flood risk to the district.</p> <p>The site has historically been used as agricultural land and is currently an unused grazing paddock. Further fieldwork for archaeological potential is likely to be necessary but this is no different to the majority of land in the Wyre Forest area. There are no significant trees on the site and there are no Tree Protection Orders in force. There are no international conservation designations on or adjacent to</p>

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				<p>the site and there is potential for biodiversity enhancement and improved green/blue links.</p> <p>The site is both available for development and deliverable and is considered to be better related to village services than other sites proposed to be allocated. It is requested that this site is taken forward as an allocation within the Wyre Forest District Local Plan Review Preferred Options (June 2017).</p>
	LPPO404	6.57	Comment	See summary LPPO400.
Land Research & Planning Associates Ltd	LPPO549	Site submitted - Land at Pound Bank, Far Forest	Comment	Our Clients' land is adjacent to Far Forest, outside Green Belt and should be supported as promoted for at least 50% affordable homes and/or Starter Homes.
Land Research & Planning Associates Ltd	LPPO554	Alternatives	Support	<p>Planning Reasons</p> <p>1. Change of Policy increasing provision of Affordable Homes from 30% to 40% would help address shortage of affordable homes in schemes of over 10 dwellings and over 1000 gross square metres. Larger developers would see this affecting viability and profits, and would resist. At the same time this would reduce the amount of normal housing being provided so more land would need to be provided.</p> <p>2. If rural settlements outside Green Belt were allowed to expand where landowners were prepared to provide at least 50% affordable homes/starter homes this would provide for a considerable amount of the shortfall. It would take the burden away in the foreseeable future of massive infrastructure costs for a new relief road.</p>

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				<p>POLITICALLY</p> <p>3. It would reduce the amount of protests recently about the use of Green Belt land for housing.</p>
	LPPO462	Extended Lea Castle	Comment	<p>Why cannot the lea castle site as a whole be developed between the A449 and Stourbridge road to the east this would give good infrastructure in the form of transport links and as this is already a major site will have the drainage , site is not within the east and south site flood plains. This could be developed to be self sufficient as there would be enough houses built to justify a new primary school and have local amenities constructed .If the land to the east and west of the current proposals were also developed this would allow a sustainable bus route, have access to the local secondary school in Wolverley and provide a sustainable community.</p>
	LPPO510	Alternative site suggestions	Comment	<p>Extend the site to the Wolverhampton Road and at the rear of Lea Castle site up to Axborough lane. Link up to Sion Hill to link with the Sion Hill Middle school site.</p> <p>With the additional land proposed including sites in that area already identified by WFDC including Hurcott ADR a sustainable community of around 2000 to 2500 homes could be created.</p> <p>This would be large enough to support a 2 form entry primary school.</p> <p>It would support a village centre which is within the Cookley parish but would not become a burden on that community.</p> <p>It could sustain a bus service.</p>

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				<p>it could produce live work units</p> <p>it would be with in the catchment of Wolverley CE High School catchment and so help with the long term viability of the school.</p> <p>A linear development to the east of Kidderminster would not be a sustainable community. It would not have a 'heart' and could not accommodate a neighbourhood centre.</p> <p>Offmore Primary school is full.</p> <p>Land to the rear of Offmore and Baldwin Road is higher and development would be visible.</p>
	LPPO692	Site submitted - The Oxleys, Tenbury Road	Comment	Call for sites submission: The Oxleys, Tenbury Road, Clows Top.
	LPPO697	Site submitted - Adjacent to Stone Hill North, Kidderminster (OC/13)	Comment	<p>Suggests additional site adjacent to Stone Hill North (OC/13).The land extends to approximately 19.5ha.</p> <p>The area is considered an essential addition to Stone Hill North (OC/13) and provided natural infill. The land would offer additional land area, is level and naturally screened in part.</p>
Hingley & Callow	LPPO699	Site submitted - Land off Bromsgrove Road, Kidderminster	Comment	<p>Suggests new site off Bromsgrove Road, adjacent to Stone Hill North (OC/13).</p> <p>The land extends to approximately 5.98ha adjoining red shaded core housing site listed as Stone Hill North. This land parcel gives a natural fill of the proposed Stone Hill North / Stone Hill South housing sites as identified and will provide for alternative access arrangements and infrastructure provisions as may be required by the overall scheme. Incorporation will also provide scope for protection for the</p>

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				water course and similar. Topography is well suited and location essential for "gateway development".
Hingley & Callow Oils Ltd	LPPO701	Site submitted - Station Yard, Blakedown	Comment	Suggests new site at Station Yard, Blakedown.
	LPPO703	Site submitted - Fold Farm, Chaddesley	Comment	<p>Suggests new site, Fold Farm, Chaddesley</p> <p>We would like to add land, as shown edged red on the attached plan, extending to approximately 0.30ha located at Fold Farm Chaddesley Corbett.</p> <p>The site is suggested as suitable for low density housing with a sympathetic design scheme to enhance surrounding properties. The site is also considered an ideal location for accommodation for retired persons.</p>
Inshore Support Ltd	LPPO707	Site submitted - Hurcott Lane/Hurcott Kennels/Stourbridge Rd, Kidderminster	Comment	<p>The land, which extends to approx. 10.74 acres, is located to the south of the Stourbridge Road, east of Hurcott Lane and north of the property known as Hurcott Kennels (which is also owned by our client). The land is more particularly shown edged in red on the attached plan.</p> <p>To the west of our clients site is land which is currently subject to an outline planning application (ref: 16/0003/OUTL) for a residential development of up to 100 dwellings known as 'Land South of Stourbridge Road Kidderminster'.</p> <p>It is our view that our client's site would be a sustainable option for the delivery of further housing for Kidderminster in line with the potential delivery of housing both at the Miller site and on Lea Castle Hospital (part of which is also subject to an application for up to 600 dwellings, up to 3,350 sq m of Class B1 employment uses and 150 sq m of Class A1/A3/D1 uses under ref 17/0205/OUTL).</p> <p>Focusing some of Kidderminster's housing delivery along the Stourbridge Road</p>

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				<p>would, in our view, be more sustainable in terms of releasing land from the Green Belt than allowing the delivery of other sites which have a greater impact on areas of ecological and conservation interest such as those proposed further south along Hurcott Lane and around Hurcott village.</p> <p>Our clients are dedicated to trying to protect the cherished Hurcott Park which provides an important green ‘lung’ in towards the built up area of north east Kidderminster and, as such, feel strongly that development should be kept in close proximity to key arterial routes into the centre and away from key ‘green’ amenities which are so strongly valued by local residents.</p> <p>We trust that our clients site will be looked upon favourably and that it will be considered as a sustainable future release from the Green Belt for the delivery of housing</p>
Wyre Forest Community Housing	LPPO722	Site submitted - Hayes Road, Wolverley	Comment	Call for sites form submitted - Hayes Road, Wolverley.
Wyre Forest Community Housing	LPPO731	Site submitted - Land off Selba Drive	Comment	Call for sites form submitted - Land off Selba Drive
	LPPO736	Site submitted - Land at Causall	Comment	<p>Call for sites form submitted - Land at Causall.</p> <p>It is infilling development across the site road frontage and therefore accords with NPPF para.89.</p>
Horton Estates Ltd	LPPO825	Site submitted - Cursley Distribution Park, Curslow Lane	Comment	New site submitted - Cursley Distribution Park, which has not been promoted during previous rounds of consultation on the LPR. Request that Cursley Distribution Park be designated as a previously-developed site in the Green Belt

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				<p>under draft Policy 34, to provide a development plan policy framework which explicitly supports the principle of replacement buildings, limited infilling and partial/complete redevelopment of this site, in accordance with paragraph 89 of the National Planning Policy Framework (NPPF). In addition, through a rationalisation of the substantial brownfield site it would be possible to release land from the Green Belt and allocate it for residential use to contribute towards your District's identified housing needs (housing need has already been identified as an "exceptional circumstance" to justify the release of Green Belt land throughout the District, in the context of NPPF para. 83). In addition we request that the site be considered through your Authority's Brownfield Land Register assessment process.</p> <p>Cursley Distribution Park extends to c.10ha of previously-developed land located c.3km southeast of Kidderminster and 4km east of Stourport-on-Severn, close to the border with Wychavon District Council. Hartlebury Railway Station and Hartlebury Trading Estate lie c.3km to the south-west. The site is accessed from Curslow Lane; with the site's single point of access taken 400m north of the Droitwich Road crossroads (A422). The village of Shenstone lies c.800m to the north-west.</p> <p>The site provides a significant quantum of floorspace (22,557 sq m) currently used for industrial purposes (B2 and B8 Use Classes, with ancillary administrative/office accommodation). The site boundary and buildings are identified on the Existing Site Plan. The floorspace is provided principally in the form of four significant high-bay warehouses (each ranging between 3,800 and 5,320 sq m), although there are ten other smaller buildings (including offices and housing for plant and machinery). There is an extensive internal road network and areas of external hardstanding (used as service/loading yards) within the site linking the various buildings. The buildings and roads/hardstanding are separated by areas of managed grassland, although there are only a small number of trees within the site and on the boundaries (the site is secured by a fence beyond existing hedgerows on the boundaries). It is understood that the site was originally</p>

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				<p>developed as a Ministry of Defence (MOD) storage depot (it appears that some of the building may have been aircraft hangars with blast walls) but it has been used for civilian employment purposes since at least 2005. The owners have invested in the asset to provide commercial units which can be let on flexible and competitive terms. However, some of the buildings are very old and there will be a need for redevelopment in the short-medium term to ensure that the buildings offer attractive facilities for the market. Save for the Green Belt designation, there are no significant environmental/physical constraints to development within or adjoining the site; there are no heritage assets (scheduled monuments, listed buildings or conservation areas); no nature conservation designations; and the site lies entirely within the Environment Agency’s Flood Zone 1. This is supported by the site assessment within the Employment Land Review (June 2016, Site Ref. 10). To the north are two bungalows and to the south are two dwellings. To the east and west lies agricultural land (arable).</p> <p>Potential Site Development</p> <p>The owners are considering options to redevelop and modernise the site including the limited infilling of vacant land in-between existing buildings and/or the redevelopment/replacement of existing buildings. This would provide a more efficient and modern business environment, and would be an entirely acceptable form of development in principle given the fourth and sixth bullet points of NPPF para. 89 which state that the replacement of an existing building and the limited infilling or partial/complete redevelopment of previously-developed sites in the Green Belt is not “<i>inappropriate</i>” development (in the case of the latter two types of development the national policy requirement is that they must “<i>...not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development</i>”). These representations request that this national policy be made explicit in the LPR by designating Cursley Distribution Park under Policy 34 as previously-developed land (PDL) within the Green Belt (akin to the designation of the nearby Rushock Trading Estate). Representatives of the owners met with Development Control in May 2017 to discuss the emerging</p>

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				<p>proposals and it is understood they received positive feedback in relation to the potential for site rationalisation where this would comply with NPPF para. 89. I also understand that there was acknowledgement that a rationalisation of the site could potentially release areas of PDL which could be redeveloped for small-scale residential purposes, as part of a comprehensive mixed-use development whereby existing employment floorspace/use is retained. I am informed by my Client that your Authority assesses the <i>“impact on openness of Green Belt”</i> on the basis of existing building volume.</p> <p>The attached Illustrative Masterplan has been prepared to provide a broad indication of how the site could be comprehensively and efficiently rationalised to replace several of the existing older buildings with modern employment buildings resulting in a total building floorspace (c.21,363 sqm) and volume (c.223,435 m3) which is a reduction on the existing position (c.22,557sqm / c.231,293 m3). In addition, this form of development would enable the potential release of areas of brownfield land which could be redeveloped for residential use. It should be noted that the Masterplan indicates a level of residential development which will exceed the existing level of building floorspace and volume (this will need to be calculated in detail) but it does serve as an indication of how the site could be developed more efficiently, and where surplus land could be released to the north and/or south. In terms of the residential development, small housing sites (1.5ha <i>“Upper Residential”</i> and 1.9ha <i>“Lower Residential”</i>) could be provided with their own designated points of access from Curslow Road, each capable of accommodating circa 40 dwellings (representing a low density to reflect the site’s rural context). The attached Masterplan is purely indicative and we would welcome the opportunity to discuss the proposals with Officers of your Authority in further detail. However, we contend that the site can offer <i>“suitable”, “available”</i> and <i>“achievable”</i> brownfield land for residential development in the context of NPPF para. 47. It is, therefore, <i>“deliverable”</i> and can be considered for release from the Green Belt.</p>

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Hurcott Village Management Committee	LPPO1629	Alternative suggestion - Extended Lea Castle	Comment	<p>I would like to make the following observations in favour of the development of the Lea Castle Site:</p> <ul style="list-style-type: none"> Options A and B of the WFDC current draft proposes using <u>some</u> of Lea Castle land for development. If the whole of the Lea Castle site were included in this proposed development then a new sustainable village, like Cookley, could be created. With a sustainable community of say 1500+ homes this could become a new Village with shops and a two form entry Primary School. It could support a village centre which, despite being in the parish of Cookley, would be a separate village. It would have good existing road links to Kidderminster, Stourbridge, Bridgnorth, Wolverhampton and beyond. It would be capable of sustaining a bus service. It would be within the catchment of Wolverley CE High School which would have a positive impact on the school's long term viability.
Gladman Developments Limited	LPPO1432	Additional site - Wolverhampton Road	Comment	<p>Gladman are promoting land straddling the Wolverhampton Road adjacent to the urban edge of Kidderminster to the south of the B4189. (HELAA ref. WFR/WC/16) 17Ha site capable of delivering up to 400 dwellings. Could bring it forward within 5 years of land being removed from Green Belt through Local Plan process.</p> <p>Eastern section already proposed under option A. Proposed release of western parcel as is also well contained and its release would help to establish recognisable urban edge to use as new GB boundary.</p>
Gladman Developments Limited	LPPO1433	Additional site The Lakes Road Bewdley	Support	<p>Gladman are promoting land at The Lakes Road Bewdley for housing. 9.52Ha site located within 2km of town centre. HELAA concluded that only 3Ha was deliverable. This reflects several factors which Gladman believe can be mitigated</p>

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				for. Outline application for 195 dwellings now going to appeal (16/0550/OUTL). In accordance with NPPF, site is deliverable, available and offers suitable location for development now. It would help to significantly boost housing supply in location outside of Green Belt.
	LPPO2713	Alternative Options	Comment	<p><u>Other options for Building, Blue Sky Thinking</u></p> <p>a. Park Lane - numerous redundant industrial buildings which have no historical merit and a timber yard which should be relocated to an industrial estate. The site opens on to the canal and would be a prime housing development. Whilst it would actually be good if Park Lane were dualled to complete the ring road, I assume that this is unlikely.</p> <p>b. Glades Leisure Centre. This land already belongs to WFDC. The councillors have a vanity project to build a Multiplex cinema and extra restaurants etc which will further denude the town of retail facilities. It is immoral for Wyre Forest District Council to be building a Multiplex whilst ignoring the need for low cost housing. In reality no developer will invest in building a Multiplex cinema in Kidderminster as there is no financial justification and so this land will remain empty when it would be an ideal site for low cost housing within walking distance of the town. Any local council which wanted to protect its town centre would reject the idea of building outside it and would build much needed low cost houses on land which it already owns.</p> <p>c. The whole of the east side of Bromsgrove Street could be redeveloped into a mixture of low rise flats and small houses for people who cannot afford cars or public transport but who could then access the town centre.</p> <p>d. Worcester Street is a totally dead street. If there really is a market for a Multiplex cinema then it should be built on the site of the large retail units</p>

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				<p>(formerly Woolworths, Littlewoods), opening directly into the town and a bowling alley in the same complex. Current tenants could move into the former TJ Hughes shop bringing another part of the town back to life. The other developments envisaged for the Glades site could also be built in Worcester Street saving this part of town from total devastation. The rest of Worcester Street should be released from retail usage for housing because realistically the town is not going to require these retail units. Even if Worcester Street is kept as retail there is considerable scope to create housing above the retail units. WFDC seems to reject ideas of this nature because they are too difficult. The Council should ask as an facilitator and not take no for an answer. The council has greater powers for Compulsory Purchase than it seems to realise. It is ,however, far easier to build on green field sites and continue to allow the town to die.</p> <p>e. In the unlikely event of a Multiplex ever getting built on Worcester Street I envisage that a roof could be built over enclosing the current square outside the Littlewoods building. Above the Multiplex would be the ideal place to build flats for independent senior citizens. Independent people who no longer have cars are far happier having independent access to shops and other leisure facilities rather than having to rely on others for lifts. Building here would give direct access to Bromsgrove Street but also by lift to the Multiplex and to Worcester Street to access all the towns facilities.</p> <p>There is however an alternative for Worcester Street:</p> <p>f. Worcester Street could be re-designated on the east side as the Kidderminster Craft Quarter and on the west side as the Kidderminster Antiques Quarter. Instead of reopening the street to traffic, replace the street lighting with Victorian style gas lamps(LED really). Reface the shops to look like a high class Victorian Shopping Street. This obviously costs money and I am aware that the empty buildings do not belong to the council. However, it would surely be better to spend money on</p>

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				<p>upgrading the shops and ensuring that the upper floors were occupied as housing rather than wasting money creating a rat run. I do wonder whether because this would be a craft centre, that funding could be sought from the Arts Council or the Lottery Community fund. The east side properties would then be let to a mixture of jewellers, glass makers, potters, weavers, artisan bakers etc who would manufacture and sell from the premises. They might well do a large proportion of their business on the net enabling the properties not to be rated as retail. The antiques quarter could be similarly developed. Indeed if Bromsgrove Street East is redeveloped for housing the existing antiques shops could be relocated onto Worcester Street where they would get higher footfall and kick start the process. The major advantage of redeveloping Worcester Street in this way is that if done properly it would become a nationally acknowledged tourist attraction and bring the thousands of visitors to the Safari Park and SVR into the town. Whilst this is not directly associated with the plan, it would be possible immediately to start a monthly craft and antiques market on Worcester Street to establish the direction of travel.</p> <p>g. Green Street/ Meadow Mill Industrial Estate. Green Street has a derelict Industrial Unit, formerly the Frank Stone building. This has no architectural merit and should be demolished. New build on Green Street could be architectural structured to match heritage buildings. Behind this unit is the Meadow Mill Estate. The largest part of this estate is empty space, used by the tenants as car parking but there is a surplus of space. There are tributaries of the Stour crossing this land which automatically makes it attractive for housing. I see a massive opportunity to create better quality industrial units and housing on the site giving a much better usage and more attractive site. To do this it would be necessary to build two sets of roads. Imagine these as interlocking fingers of two hands. Entering down the fingers of one hand would give access to the ground floor industrial units. Entering down the fingers of the other hand would give access to the low rise housing units. This would provide total separation of the domestic and commercial traffic and</p>

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				<p>improve both the look and the usage of the site several times over. Whilst once again our council would dismiss this plan out of hand because it is too difficult, I envisage that the owners of the site would make a considerable profit from this scheme whilst increasing the number of small commercial units available and creating hundreds of residential units.</p> <p>h. Completely redesign the high school provision for Kidderminster. Start with Baxter College. This is a failed school that is losing students to the point that some of the current buildings are now being left empty. It shares its site with The Wyre Forest School which is a brand new building but was built for the wrong number of students and so is inadequate. A new, larger, school is required (including provision for 18-25 years olds). The solution to this is to close Baxter College completely and disperse its students between Wolverley and King Charles School. The Wyre Forest School should be rebuilt on the Sladen site. This fulfils the covenant for educational use and allows a school of the correct size to be built. The present King Charles 1 High School should be closed and an enlarged school be built on the site already earmarked behind the redundant Stourminster School. As an academy, KC1 school would find this attractive as it would profit from the sale and create a larger (and better financed) school. The final piece of the jigsaw would be to close Wolverley C of E High School and move it on to the vacated Baxter site. The brand new Wyre Forest School buildings will make an excellent sixth form centre. Two sites would be released for building. The KC1 site would give fantastic opportunities to build mixed housing within walking distance of the town and the station. The Wolverley site is enormous and would create a brand new village big enough to fill the gap between the brownfield availability and the 6000 units which WFDC has calculated that it needs. (not withstanding the fact that the 6000 units aren't required. At least if they were built on the West side they would be within commuting distance of Wolverhampton/ Bridgnorth,etc.)</p> <p>I. There is considerable scope to redevelop the land around the Harriers football</p>

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				<p>ground. The industrial estate is another example of grossly underutilised industrial land. This combines with the enormous problem of a lack of parking for the new Kidderminster station and the SVR. The solution is to dig the entire site out and create a two-storey underground carpark. On top of this at the level of the current Hoo Road would be the industrial units and above these would be low rise residential units. For a blueprint of how this could be achieved, look at the Victoria Centre in Nottingham (I am aware that the hole already existed). Again, because of the ability to charge for parking and the housing this would be a profitable and therefore viable project. This development could actually be a prestige project which would attract national attention for its brilliant use of space. I also envisage a profitable project in building a new East Stand at the Harriers ground. (Again to look for a blue print look at the current Chelsea Football ground). A new stand would incorporate seating for the football club, new changing facilities (Harriers Ladies team?) and flats. The great thing about the flats is that they would face the SVR. This could be a very profitable development as it would be ideal for high value flats with access to the station.</p> <p>Many of my suggestions will be rejected by Wyre Forest District Council, but I believe that they are all commercially viable. They could contribute to the positive development of Kidderminster unlike building on the greenfield land, or missing out on town centre development and allowing the town to continue its slide to dereliction.</p>
	LPPO2807	Alternatives	Comment	In Kidderminster, brownfield sites should be used. There are available empty properties owned by Wyre Forest District Council, which should be developed into affordable housing. Worcester street in Kidderminster is a street of empty shops with accommodation above. Why is this not being looked at before taking Green Belt land?
	LPPO2797	Extended Lea Castle	Support	Before building on this valuable Green Belt/farm land all the land at and around the old Lea Castle site should be used together with all brownfield sites no matter

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				how small and which are in an accessible position of which there are many around Kidderminster.
	LPPO2515	Site Suggestion - extended Lea Castle	Comment	Suggests a larger site at Lea Castle. Utilising all of the land proposed in both Option A and B and extending the site to include land up to the Wolverhampton Road and at the rear of Lea Castle up to Axborough Lane. There might also be a possibility of further development on the eastern side of Wolverley Road towards Sion Hill, which would link with development at the Sion Hill School site. With this proposed land, including the sites in that vicinity already included in the Plan, a sustainable community of around 2,000-2,500 houses could be created. This would be large enough to support a 2 form entry primary school within the catchment of Wolverley High School (thus positively impacting on the schools long term viability) and a sustainable bus service. It would also support a 'village' centre within the Cookley Parish without putting a burden on that community and would potentially be able to support live-work units,
	LPPO3033	6.57	Object	Question 4: further options? Not without further information other than to say that brownfield land should be used first
	LPPO737	Site submitted - Fingerpost Cottage, Cleobury Road, Rock	Comment	Call for sites form submitted - Fingerpost Cottage, Cleobury Road, Rock.
	LPPO2297	Options	Comment	Question the need for the amount of housing needed. Does not consider the release of housing from the older population as on Spennels. Affordable housing would be better placed nearer the town centre / or within reasonable walking distance of the railway station. Convert the "Courthouse", use the land where the auction / markets are presently. Make changes to the more derelict areas around the town – old carpet mills – horsefair - etc
	LPPO2877	Alternatives	Comment	It states there is insufficient brownfield sites and non- Green Belt land to

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				<p>accommodate housing and employment growth.</p> <p>There are brownfield sites not even on the plan.</p> <p>Chuchfields Kidderminster , Brown Westhead Wolverley , park Lane , Kidderminster , Brown Westhead Wolverley. Kidderminster is a dead town and building affordable homes and bringing life and community back into the town should be a priority.</p>
	LPPO515	Extended Lea Castle	Support	<p>I support building on the Lea Castle site for the following reasons:</p> <p>Large number of the dwellings would be on existing brownfield ground and not reducing the amount of Green Belt land. The size of the area could be further increased by using the land up to Axborough Lane.</p> <p>A large number of dwellings could support a 2 form entry primary school, thus reducing the impact on the local facilities.</p> <p>It would be within the catchment of Wolverly CE High School and would positively impact the schools long term viability.</p> <p>It would be capable of sustaining a bus service</p> <p>It would support a village centre which would fall under Cookley parish, but would not put any burden on that community as it would be large enough to support its own park, village hall, school and shop.</p> <p>It would potentially be able to provide live-work units.</p>

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	LPPO577	Extended Lea Castle	Support	<p>I support building on Lea Castle for the following reasons:</p> <p>Large number of dwellings would be on existing brownfield ground, and not reducing the amount of Green Belt land around the town. The size of the area could be further increased by using the land up to Axborough Lane.</p> <p>A large number of dwellings could support a 2 form entry primary school, thus reducing the impact on the local facilities.</p> <p>It would be within the catchment of Wolverly CE High School and would positively impact the schools long term viability.</p> <p>It would be capable of sustaining a bus service</p> <p>It would support a village centre which would fall under Cookley parish, but would not put any burden on that community as it would be large enough to support its own park, village hall, school and shop.</p> <p>It would potentially be able to provide live-work units.</p>
	LPPO626	Alternative site suggestion	Comment	<p>A potential way to help preserve more of the Green Belt would be to revive the plan to rebuild King Charles I School on the Borrington Road site. This could increase school places at secondary level to support the proposed new housing developments. The original plan had much of the expansion into the Green Belt consisting of playing fields, which most people would find less objectionable than housing and also help to maintain clear land between Stone and Kidderminster. Old school site on Comberton Road could then be released for housing. This would be much more suitable than a site on the edge of Kidderminster since it is closer to town and facilities such as GP practices. It would be within walking distance of the railway station and so remove the need for extra</p>

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				car journeys and also be within walking distance of the town centre.
	LPPO671	Alternative site suggestions	Comment	<p>I suggest that any of the following sites away from existing developments would make suitable sites as an alternative to Option A:</p> <ul style="list-style-type: none"> - Sion Hill school - Lea Castle - Land on A456 between Blakedown and Hagley - Land which is no longer used by Wyre Forest Golf Club - The old Brintons Golf Driving range on Stourport Road.
J & H Evans	LPPO690	Site submitted - Land fronting Rectory Lane, Rock	Comment	Call for sites submitted: Land fronting Rectory Lane, Rock
	LPPO693	Site submitted - Land North West of Ferndale Crescent, Kidderminster	Comment	<p>The land proposal off Ferndale Crescent has sustainable access to a wide range of services from bus stops to shops and schools to recreational space/facilities and represents a sustainable form of development.</p> <p>The land is grade 3 agricultural. There is a footpath crossing the site that would be retained.</p> <p>The site has attracted interest from several developers and, if removed from the Green Belt, would be deliverable within 5 years.</p>
	LPPO698	Site submitted - Land at Crundalls Lane / Grey Green Lane, Bewdley	Comment	<p>Suggests land off Crundalls Lane / Grey Green Lane.</p> <p>A total area of 6.95ha that would provide natural infill within the existing road structure network. Whilst part of the site is recognised as having limited flood risk this could be utilised effectively as open space giving an estimated 5ha of developable land. With a density of 20-25 houses per hectare on the net</p>

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				developable area and allowing for public open space. It is also considered that this would be considered an ideal location to include an element of accommodation for retired persons.
Hingley & Callow	LPPO700	Site submitted - Land off Stanklyn Lane, Kidderminster	Comment	<p>Suggests new site - Land off Stanklyn Lane.</p> <p>The site, as shown edged red on the attached plan, extends to approximately 3.3ha adjacent to an existing blue shaded option A housing site. This area would offer additional land area, is superbly screened by existing natural features and give an alternative access back to Stanklyn Lane. The site is suggested as suitable for low density housing with a sympathetic design scheme to enhance surrounding properties.</p>
	LPPO702	Site submitted - Land adjacent to Chaddesley School	Comment	<p>New site suggested - Land adjacent to Chaddesley School.</p> <p>We would like to add land, as shown edged red on the attached plan, extending to approximately 2.4ha located adjacent to Chaddesley Corbett School.</p> <p>The site provides an ideal opportunity to enable modern housing development. It may be beneficial for the school to be incorporated within the village boundary.</p>
R & D Turner Charitable Trust	LPPO706	Site submitted - Land south of Arley Lane, Goods Green, Upper Arley	Comment	<p>New site suggested - land south of Arley Lane Goods Green, Upper Arley.</p> <p>The land is open farm land and includes a range of underutilised partially redundant farm buildings. The site in all extends to approximately 4.20ha, a plan showing the area outlined in red is attached for your information.</p> <p>The area is located opposite a previously developed residential site and offers scope for missed density housing to include starter and retirement homes. The land owners attitude towards development is positive and they desire to maintain a thriving village economy with employment and tourism generation, support for</p>

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				<p>the school, sports/social grounds, and local businesses a key focus.</p> <p>Accessibility is good and we understand principal</p>
Rock Parish Council	LPPO1164	Site suggestion - Bliss Gate Inn	Comment	<p>Would like a policy in the Local Plan to encourage the refurbishment of the Bliss Gate Inn to be converted into units of accommodation together with the use of the rear Car Park. The site has fallen into a poor state of repair and really does great harm to the gateway into the Bliss Gate Village.</p>
Worcestershire Wildlife Trust	LPPO1053	Paragraph 6.57	Comment	<p>We strongly recommend a blend of Options A and B, amended to remove the Settling Ponds, Wilden Lane core allocation, the proposed eastern relief road and the Option A allocations to the east of Kidderminster because of their significant ecological impacts and the limited evidence underpinning the need for the road.</p> <p>We believe that such an approach would deliver the required level of development whilst taking a positive step towards reducing the overall environmental impact of the Local Plan. Notwithstanding this helpful improvement there will still be significant implications for biodiversity and Green Infrastructure arising from a number of the allocations and additional work to confirm the acceptability of their inclusion will be needed prior to finalising the Plan.</p> <p>Once the final allocations are agreed it will be essential for the Local Plan to set out mechanisms for the effective delivery of biodiversity enhancement and GI. The policy framework included in this consultation offers a helpful starting point, particularly in Policies 11D and 14, but we consider that the Plan needs to go further. With that in mind we would recommend that sites sitting in well defined geographic clusters be pulled together to form cohesive groups so that major developments are delivered using the GI led approach championed by the Worcestershire Green Infrastructure Partnership. In short such an approach would suggest that groups of contiguous or closely associated sites be covered by</p>

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				<p>overarching Green Infrastructure Concept Plans designed to maximise the environmental benefits available at each location. This fits closely with the policy framework already set out in policy 14 and offers a mechanism by which master planning of the major developments proposed can be guided towards the most sustainable outcomes. We would be pleased to discuss this with the council if that would be helpful.</p> <p>For further information please see our comments under the relevant allocations policies and our response to paragraph 6.54.</p>
	LPPO2170	Extended Lea Castle	Comment	Can the required number of new houses be provided by using the land around Lea Castle between the Wolverhampton Road and the Stourbridge Road? There are major highways already established in this area with good links to other urban areas and any development would not butt up to existing dwellings but could be a stand alone ‘village community’ with access to Wolverly High School.
Campaign to Protect Rural England	LPPO983	6.57	Comment	Grey Green Lane - Could potentially develop north on either side of Grey Green Lane but would hope that this was not required. At Low Habberley there is a viable urban extension. This would then mean the urban extensions east of Kidderminster would not be needed. Site is well contained plateau between Habberley Valley and tributary of Honey Brook. Not high grade agricultural land.
Sir Thomas White's Charity	LPPO899	Site submitted - Land North West of Kidderminster	Comment	Our client owns the land to the north-west of Kidderminster, adjacent to Habberley Road (B4190) and covers an area of approximately 36 hectares. A site location plan is submitted with this representation. The site is adjacent to the urban edge of Kidderminster and approximately 3.5km to the north-west of the centre. The site is bound by hedges which forms the boundary of the site. To the north the site is bound by Sandy Lane, which creates an access point to the site. To the east the site is bound by residential dwellings from Coningsby Drive, Harvington Close and Carlton Close. To the south the site is bound by High Habberley House and dense trees and to the west the site is bound by agricultural

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				<p>land. Low Habberley Road transects the site from east to west.</p> <p>The site is deliverable for residential development and is situated within a sustainable location, with suitable accessibility. The site is within close proximity of a wide variety of services and facilities. Including a food superstore and post office 400m to the south, Franche Community Primary School 600m to the south, and Baxter College 700m to the south. The site is not constrained and could deliver housing immediately, which is supported by the Council’s Housing and Economic Land Availability Assessment (HELAA), published in June 2016, through which the majority of the site forms part of a wider assessed area. The HELAA concludes that the site is potentially developable after five years, if the site were to be released from the Green Belt. Therefore the site has the potential to make a meaningful contribution to the housing requirements within Kidderminster and if necessary could be delivered in phases. The site location plan submitted with this representation shows the potential for a phased development depending on the Council’s requirements. If there is a smaller, short term need, a smaller element of the site could be brought forward, as ‘Phase 1’ for approximately 120 dwellings. This would assist the Council in achieving its ambitious target of delivering 300 dwellings per annum.</p> <p>Of the five Green Belt tests, the site is only considered to conflict with the test of assisting in safeguarding the countryside from encroachment. However, this is inevitable given the Borough’s housing needs and the fact the plan is not proposing a sufficient supply to meet its needs. Given these pressing needs the release of the site will not compromise the delivery of urban regeneration and the use of derelict and urban land. The Council has exhausted these sources of supply before releasing other sites from the Green Belt which are proposed for allocation.</p> <p>Development of the site would not result in unrestricted sprawl of large built-up areas. It represents a minimal extension to the north western edge of</p>

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				<p>Kidderminster and would include landscaping to provide sufficient defensible boundaries to reduce its impact on the open landscape beyond the site.</p> <p>It would not result in neighbouring towns merging, there would remain a minimum 200m buffer between the edge of Low Habberley and the edge of phase 2, and in any case any proposals for the site would be sensitively designed, with open space provided on this edge to increase the buffer further. In turn this buffer would also ensure any development preserves the setting and character of Low Habberley.</p> <p>The representations above set out why our client considers that additional land needs to be allocated by the plan, as well as further flexibility should be incorporated within the Council's housing supply, if the plan is to be found sound. We also outline the reasoning the land north-west of Kidderminster being a suitable location for sustainable development and that it is an appropriate location for residential development to meet this shortfall.</p>
Stone Parish Council	LPPO1160	Additional Site - King Charles High School, Kidderminster	Comment	Suggests that King Charles High School on Chester Road, Kidderminster be re-developed for housing. Relocating the High School to the land adjoining the Lower School at Borrington Road.
Taylor Wimpey West Midlands	LPPO1553	Paragraph 6.57	Comment	<p>Potential issues with delivering solely Option 'A' or 'B,' a combination of the Options is most appropriate. There is concern that whilst the identification of a further urban extension in Option A is logical, deliverability will be dependent on all the land between Comberton Road (A448) and Worcester Road (A449) being secured.</p> <p>There is concern that the Council has not set out a balanced overview of Options A and B in setting out their consultation questions in paragraphs 6.54 to 6.56. For example, paragraph 6.55 outlines the benefits of Option 'A' and paragraph 6.56</p>

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				largely discusses the dis-benefits of Option 'B', which provides a bias view in favour of Option 'A.' Taylor Wimpey consider there to be benefits and dis-benefits of both options which will need to be carefully considered in light of responses to this current consultation and further evidence prepared.
	LPPO709	Site submitted - Heath Lane, Shenstone	Comment	Call for sites form submitted for land at Heath Lane, Shenstone. Proposed use for Travelling Showpeople
	LPPO2173	Extended Lea Castle	Support	<ul style="list-style-type: none"> • Leas Castle is ideal. • Can provide school and shops. • Has good roads north and south but Hurcott Road is already impossible.
Gladman Developments Limited	LPPO1424		Comment	Stourport-on-Severn is a sustainable market town that can accommodate more growth than currently identified under this policy. Non-Green Belt sites in sustainable locations also need to be considered. Land at Astley Cross also presents a development opportunity.
	LPPO2888	6.57 Alternatives	Comment	<p>Viable alternatives - do not accept that proper consideration has been given to all of the brownfield sites. Still scope for brownfield development of apartments and flats e.g. Park Lane, Green Street, site of Crown House, sites of former schools, Jobcentre etc best way to provide much needed affordable housing.</p> <p>An aging population need suitable housing to downsize to, near town centres and shops are ideal for this. Before releasing Green Belt you should demonstrate that there are insufficient brownfield (or green field non-Green Belt) alternatives. I do not believe you have done this in the current plan.</p> <p>I would support a 'Spennells type' development on the Lea Castle site, expanding the current proposal. A full development on that site would support a primary school. Creating a 'second Spennells' on the Lea castle site would have less impact</p>

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				on local residents as it could be self-sustaining providing shops and live/work units providing employment opportunities. Lea Castle site has better road access, between two A roads it already has the necessary road infrastructure as the Wolverhampton Road and Stourbridge Road are already linked. This means there would be no 'rat runs' created through residential streets.
	LPPO3050	Alternatives	Comment	Shortfall of housing should be met by utilising Brownfield sites as was the case on the old Power Station site in Stourport and the sugar beet factory in Kidderminster.
	LPPO3051	Alternatives	Comment	What about the building in the Bull Ring that is not being pulled down now that could be made into accommodation?
Midcounties Co-operative Society	LPPO820	Site submitted - Land South of Wolverley Road, Kidderminster	Comment	<p>Suggests site: Land south of Wolverley Road, Kidderminster (site ref FHN/7)</p> <p>The owner is keen to see the land brought forward for development as soon as possible and there are no physical or legal constraints on doing so.</p> <p>The site is currently included in the Green Belt and the Local Plan Review Preferred Options maintains such a designation.</p> <p>These representations do not address in any detail the scale or nature of the need for new housing in Wyre Forest though the right to do so a later stages of the Local Plan Review process is reserved.</p> <p>The published evidence & other material which informs the Preferred Options demonstrates that there is a clear need to allocate a substantial amount of additional land for new housing; and that this need cannot be met without releasing for development a significant amount of land that is currently within the Green Belt. The Council's positive approach to addressing this challenge — a strategic review of the Green Belt, the development of a coherent spatial strategy and careful site selection - is to be welcomed. However irrespective of the nature of the spatial strategy adopted by the Local Plan Review, the release of land south of Wolverley Road for residential development is wholly justifiable.</p> <p>The site</p>

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				<ul style="list-style-type: none"> • is bounded on three sides by the existing urban area and its development would represent a natural rounding off of the built form • it is framed by existing physical features and so and clear & defensible Green Belt boundaries can be defined in line with provisions of NPPF para 85 • its development would integrate well with & benefit adjoining development by facilitating & improving access from it to nearby countryside & recreation <p>New housing on the site would contribute to meeting acknowledged needs, be wholly acceptable at the site specific level and would not, by virtue of its modest scale and comfortable relationship with the existing area, prejudice whatever spatial strategy is pursued by the Local Plan Review or the functions of the Green Belt. The Council is urged to give positive consideration to its allocation for residential development by the Local Plan Review.</p>
	LPPO2057	Extended Lea Castle, Wolverley Road and Ferndale	Comment	<p>Extend the land at Lea Castle up to Wolverhampton Road and at the Rear of the site up to Axborough Lane. Also develop on the western side of the Wolverley Road towards Sion Hill to link with the development of the Sion Hill Middle School site. The sites are:</p> <ul style="list-style-type: none"> • within the catchment of Wolverley CE High School and could positively impact on the schools long term viability. • would be capable of sustaining a bus service. • would be large enough to support a 2 form entry primary school. • would support a village centre and would not put a burden on the Cookley Parish community. • could provide a sustainable community of 2,000 to 2,500 homes. <p>Also the WFDC are wrong to not propose ANY development on the North/West of Kidderminster, at least 100-200 homes could be developed at the rear of the existing Ferndale Estate.</p>
	LPPO2707	6.57 Extended Lea Castle	Support	We support the proposal for Lea Castle sustainable village which would allow for a

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				community development, complete with primary school and would be capable of sustaining a bus service.
	LPPO1974	Other site suggestions.	Comment	<p>Development could be carried out on:</p> <ul style="list-style-type: none"> • the site of the old Leisure centre and adjoining car park that could integrate the disused shops in Worcester Street • empty factory units behind Matalan • the old builders yard in Park Lane • Wyre Forest Golf Club (site now disused) • Crown House <p>Development of the old Lea Castle site should be used before green fields sites.</p>
	LPPO2590	Extended Lea Castle site	Support	<p>I believe that a better option is for the brownfield site of Lea Castle to be developed to meet Kidderminster’s needs, this makes much more sense as it is close to the 449 Wolverhampton Road and would eliminate the need for a very expensive bypass. The development would be large enough to serve a small primary school and feed on into the secondary school at Wolverley which has the capacity to take the children.</p> <p>With shops and doctors added it would become a desirable place for families to live.</p>
	LPPO2918	Lea Castle	Comment	Lea Castle would be perfect for this kind of development and work along the lines of Spennells. Also, this would benefit Wolverley High School and provide increased pupil numbers for them wouldn't it?
Stourport High School	LPPO1202	Alternatives	Comment	Surplus land in the control of Stourport High School should be allocated for development. Reasons to support this proposed allocation:

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				<ul style="list-style-type: none"> • Stourport High School is in significant need of funding to repair and replace dilapidated buildings. Insufficient grant funding to undertake the substantial building work required to the school. The school are, therefore, in a position where they are having to generate their own funds. Intention of the school to pursue a residential planning permission on surplus land in their control and sell it to a developer. This funding will then be used to assist the funding of the building and repair works. It will improve the facilities available to the school’s pupils and safeguard the future of the school for years to come. • No other allocation within Stourport will have similar benefits, only site where money generated from the development will directly fund a community facility. • The site has clear and strong defensible boundaries. • Proportion of the site is previously developed land. Paragraph 89 of the Framework allows for the limited infilling or partial or complete redevelopment of previously developed land. whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt for the purposes of including land within it. The proposed residential development on the previously developed section of the site will have a reduced footprint in height compared to the Sixth Form building. • There is significant development to the north east of the site that helps define the built up edge of Stourport. Development in this location will not, therefore, erode the perceived gap between Kidderminster and Stourport. <p>The above factors, when taken in combination, constitute ‘exceptional circumstances’ that justify the release of the site from the Green Belt and its allocation for residential development.</p>

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				<ul style="list-style-type: none"> Site is appropriate location for development. The surplus land in the control of the school is in a less important Green Belt location than Wyre Forest Golf Club (LI/2). It is disappointing that the land in the control of the school has not been assessed through the Council' Green Belt Assessment, as it was previously advised by Officers that that would be the case. The surplus land in the control of the school is better related to the built up extent of Stourport. It will not have such a significant impact in terms of reducing the gap between Stourport and Kidderminster. The various proposed allocations at Stourport will result in the population of the settlement increasing placing additional pressures on the school. The additional funding generated by the sale of the site of the housing will help improve the school facilities and assist in meeting the increased number of pupils. <p>The site is in a suitable and sustainable location for development, performs a highly limited Green Belt role and is the only site that the site promoters are aware of that have direct tangible social benefits. The site should be allocated for development in the emerging Plan.</p>
Stourport High School	LPPO869	Site submitted - Land off Coniston Crescent, Stourport	Comment	Call for sites form submitted for land off Coniston Crescent, Stourport-on-Severn.
Strong Farms (LS) Ltd	LPPO878	Site submitted - Stour Corridor/Lea Castle, Wolverley	Comment	Call for Sites form submitted - Stour Corridor/Lea Castle, Wolverley.
Kidderminster Harriers Football Club	LPPO926	Site submitted - Kidderminster Harriers Football Ground	Comment	Call for sites form submitted for Kidderminster Harriers Football Stadium - To allocate for housing the existing Aggborough Stadium & adjacent car park. This combined site is estimated to be 2.38 hectares, thus has a potential capacity for around 96 new dwellings assuming a density of approximately 40 units /ha.

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				<p>Housing in this close to town centre location would reduce the need to allocate other sites elsewhere in the district particularly those lying beyond the existing built up areas of the town and in Green Belt. The submission of this site for consideration for potential residential development is conditional upon the successful relocation of the current Kidderminster Harriers use to a suitable alternative site which will meet the club's future needs.</p> <p>The existing Aggborough Stadium and car park is a town site within easy walking distance from the rail station Kidderminster Station (approx.0.5 miles). Housing development here would help reduce the extent of encroachment into Green Belt currently proposed in the new Local Plan (Core Housing sites, as well as both options A & B). Housing on the outskirts of town currently proposed would not necessarily have the opportunity to be as well integrated into the existing Kidderminster town and the services/retail offer that a closer town centre location (i.e. the Aggborough site) would provide.</p> <p>Housing on the site would be more compatible with existing neighbouring uses, these being predominantly residential.</p> <p>The site is not subject to any particular designations that would otherwise impinge on redevelopment here. For example, it is not within a Conservation Area, there are no listed buildings or Tree Preservation Orders (TPO) and there are no flooding issues.</p> <p>The relocation of the existing football club to the new facilities south of Kidderminster will not happen immediately, but, with appropriate planning policies in place, could take place within the first five years of the proposed Local Plan period, thus freeing up this site for the required housing.</p>
Kidderminster Harriers Football Club	LPPO995	6.57 - Kidderminster Harriers Stadium	Comment	<p>To support development on previously developed land before land with greater environmental or amenity value, in accordance with NPPF para's 110 – 111. Add to list of Core Sites for allocation: <u>Aggborough Stadium and car park site for housing (total approx.96 units). Not</u></p>

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				<u>currently in Green Belt so removal is not necessary.</u>
	LPPO2390	6.57 Alternatives	Object	We feel that a development on ground such as the old Glades Leisure Centre site or maybe the Cermaspeed site would be much more advantageous and would also enhance the town centre. There is no enhancement to be found by adding such a large number of council properties to a very small village.
	LPPO2540	6.57	Comment	There are lots of sites in Kidderminster , i.e., the grounds of Sion Hill school, Sion Hill, Sladen School, Hurcott Road. where people can get a school place, into a doctors surgery, regular buses & walk into Kidderminster town centre where they may work.
	LPPO2690	Selba Drive	Object	<p>I was dismayed to learn that "Land Off Selba Drive" (reference number BHS/22) is included in the Local Plan Review as suitable for housing development.</p> <p>I wish to strongly object to this, on the grounds of overcrowding of access routes and the terrible erosion of local amenities.</p> <p>For decades, this open land has been widely used by children of all ages, families and dogwalkers. As it is adjacent to the Selba Drive cul-de-sac, it is a safe area for children to play in sight of a number of homes and with no through access and therefore few cars. There is no other such area on Habberley estate. To build on this land would be to deprive the whole community of a valuable and much-needed recreational area.</p> <p>With the recent redevelopment of the Cooper's Arms public house and adjacent church and church hall, the land in question will be even more in demand for use by locals. The closing down of the public house, church and church hall leave precious few local amenities in the area, making this land an even more precious community resource.</p>

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				<p>Access to Selba Drive is already difficult, with the adjacent Westminster Drive now very crowded with cars. When the new houses on the public house and church site are occupied, increasing pressure will be put on the area from parked vehicles and from traffic. The development of the open land next to Selba Drive would dramatically worsen this problem.</p>
	LPPO2235	Para 6.57	Comment	<p>If Greenfield sites are made available to developers, there is danger that they will be used, because they are easier to build upon and present a better profit margin, while the blight zones around our towns remain. The council should take steps to ensure that all brownfield sites, such as the Sion Hill school site and the area adjacent to Tesco in Stourport are developed. Pressure should be put upon landowners not allowing their properties to be developed because they hope for greater profit. The many derelict buildings around the town centre, such as the old Law Court building, disused factories in Green Street and Park Lane, the old Woolworths and BHS buildings could be made into truly affordable apartments for first time buyers and provide social housing. Inclusion of Green Belt in the plan should not be considered until all of the brownfield sites have been used.</p> <p>Housing development around the town centre would help to regenerate Kidderminster whereas development almost two miles away on the edge of the town will not. People living in the town would have easy access to the town and to the station. There would be less car journeys and less pollution. Option B better meets this need.</p> <p>I am glad that steps are finally being taken to develop the waterfront areas in Kidderminster but when is the eyesore, Crown House (the old Post Office building), going to be addressed?</p> <p>I do not feel that the proposed cinema on the Glades site will help to regenerate the centre of the town. It will further draw attention away from the centre. This</p>

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				<p>area could better be used for housing, including housing for the elderly within walking distance of shops, restaurants, doctors, opticians, dentists etc.</p> <p>High property taxes have driven many small businesses away from Kidderminster town centre. Can the council find a way to reduce property taxes to encourage small retail businesses back into the town and improve local economy?</p> <p>I suggest that building west of Kidderminster should be take place instead. The expanded Lea Castle site should be fully developed for housing, with associated provision of a primary school, shops etc. The plan has not considered Blakedown. Parking at Kidderminster station cannot be expanded but there is scope at Blakedown. Consideration should also be given to building at Chaddesley Corbet and Wolverley, rather than focusing upon the area joining the east of Kidderminster. The plan should be revised to include this option.</p>
	LPPO2254	6.57 Alternatives	Comment	<p>The whole of the Wyre Forest including outlying villages like Wolverley, Blakedown, Chaddesley Corbett should be included within these proposals and any development spread across the whole district to ensure that urban sprawl is contained and building is within existing boundaries.</p> <p>The Government is not in favour of developing green field sites unless it is a last resort. There are many brownfield sites within the area that should be developed, some of which already have planning permission but are being held as land banks. The Council should not allow this and should lobby Parliament to ensure this is against the law.</p>
	LPPO2558	Site suggestion - extended Lea Castle	Support	<p>The alternative that I would please ask you to consider is the Lea Castle area. This is already an existing built upon site which could be expanded to create a brand new community. Why not create a new part of Kidderminster with a new school, shops, play area, pub which would be far more appealing to people moving to the</p>

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				area?
	LPPO1923	New site suggestion Wolverley.	Comment	There are brownfield sites that are not on the plan, e.g. Brown Westhead Park, Wolverley, partially owned by the Council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster.
	LPPO3061	Para 6.57	Comment	<p>Suggested areas for development</p> <p>Development around existing housing estates in the North of the district; Ferndale, Habberley, Franche and in the South East; Offmoor, Spennells, Stanklyn would develop the Wyre Forest area along a North-South axis and not merely provide commuter residences for other districts to the East. Developing and regenerating the town centre would create a more natural demand for housing from the indigenous population, while attracting a younger element that would be attracted to a vibrant district hub. Building a large number of houses along the eastern edge of the district would not encourage growth from within.</p>
	LPPO2483	Lea Castle	Support	I think there is enough housing in Kidderminster. But if there is a need for more, why not housing like mobile homes, modern, compact but permanent with communal laundries and gardens.
	LPPO1967	Extended Lea Castle	Support	<ul style="list-style-type: none"> • Lea Castle would be most appropriate for development. • A community could be set up. • Main road surround the site.
	LPPO1995	Lea Castle Hospital Extension	Support	<ul style="list-style-type: none"> • The Lea Castle site would be a better option.
	LPPO1837	Lea Castle Hospital	Support	Supports extended Lea Castle Development.

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		Extension		
	LPPO2629	6.57 - Alternative site	Comment	<p>As an alternative, we propose that the Local Plan includes ALL brownfield sites, developed to their maximum potential, especially the former school sites, and specifically a larger scale development on the former Lea Castle site and small amount of attached green fields, which we feel could support a 200-2500 home development. This site would facilitate the the building of a primary school, development of community facilities and a community heart as well as improving the longer term viability of Wolverley Secondary School. It would also provide a larger financial contribution to infrastructure. This development would not adversely impact on the existing Cookley village community, but would mean a regular bus service would be very viable. The derelict, disused Lea Castle site would become a vibrant community for the future.</p> <p>Development should also be actively pursued on the north western area of Kidderminster, e.g. extending housing development in the Ferndale area.</p> <p>We feel that these proposals would not only provide merely the sites for housing development, but sites which are sustainable, attractive and enhance the Wyre Forest as a whole.</p>
	LPPO2659	Callow Hill	Comment	<p>We feel the land is ideally suited for a small development (two detached houses affordable to second time buyers).</p> <p>Two modern detached house have been built opposite and there has been small infill development across the road on the main Kidderminster to Tenbury road. We know of many families looking to move out of first time buyer properties to a more rural location therefore freeing affordable properties at the bottom end of the market.</p>

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				This project would provide valuable accommodation to help with the housing crisis in the area. This area would particularly benefit from young families moving into it providing a healthy wide spread age band of residents therefore enhancing the community spirit.
	LPPO2672	Lea Castle	Support	<p>There is a particular need for more homes for one or two person households, and for people who need genuinely affordable homes, including social housing.</p> <p>I understand that one of the possibilities would be a development of the Lea Castle site. The site is large enough to support a community with a primary school and local shops and facilities, and a community of that size should also be able to support a regular bus service.</p>
	LPPO1461	Lea Castle Sustainable Village	Support	<p>Supports Lea Castle site being developed as it already has services such as power, phone connections etc. from past use.</p> <p>If it were to be developed would like us to overcome some issues such as traffic.</p>
Wyre Forest Green Party	LPPO1488	Additional Brownfield Sites - Kidderminster Town Centre	Comment	<p>The Council must make more effort in identifying suitable brownfield sites.</p> <p>The Council has made a number of attempts to attract more retailers to Kidderminster over the last few years, with limited success. It is clear that it is becoming more difficult for high street retailers to compete with Internet services in all but a few markets, but there is no recognition of this in the Plan. The trend nationwide is for a decline in the number of banks, building societies, estate agents etc. which make up many of the businesses in town centres. Kidderminster town centre has at least 40 large shops and office blocks that stand empty, some for well over a decade. The town centre is in urgent need of regeneration. We believe that Compulsory Purchase Orders should be made on some of the larger vacant shops. Planning needs to accept that the amount of shop frontage in Kidderminster is in excess of need and the area associated with retail and related</p>

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				<p>businesses in Kidderminster town centre be downsized to reflect likely future demand, and areas surplus to retail, such as Worcester Street, converted to apartments with some mixed use.</p> <p>Crown house on the Bull Ring in Kidderminster and the timber yard on Park Lane are significant examples of brownfield sites which should be in the Local Plan. Should the land owner not be amenable to housing development then we urge the use of Compulsory Purchase Orders.</p>
Wyre Forest Green Party	LPPO1492	Site suggestion - Wyre Forest Golf course	Comment	Stourport also has a number of Brownfield sites which are in need of development in order to meet some of the local housing needs of a growing/developing town centre. The now defunct Wyre Forest golf course has released some land and there is no reason why the whole of it should not be released for housing development. Growth of Stourport will require improvement in infrastructure, in particular public and private transport provision.
	LPPO2184	East of Kidderminster - Lea Castle	Support	<ul style="list-style-type: none"> • Supports Lea Castle Extension. • Would be able to sustain many houses, a school etc. which is badly needed.
	LPPO2791	6.57 Kidderminster town centre	Support	I would suggest that a large proportion of the existing retail zone in the centre of Kidderminster, in which properties are currently vacant, could be reallocated to housing before building on Green Belt. This would have the benefit of regenerating the town centre and putting housing close to local amenities.
	LPPO2793	6.57 Kidderminster town centre	Support	I am shocked by the state of Kidderminster town centre. It is very run down with derelict sites and empty buildings. Surely these sites should be used for housing before any green sites are even considered. Wyre Forest Council should be ashamed of the state of Kidderminster town centre, and it should be a top priority for any development.

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	LPPO2794	6.57 Kidderminster town centre	Support	There are brownfield sites in the centre of Kidderminster which should be used to alleviate housing shortages, thereby improving the appalling state of the present town centre.
	LPPO2210	Extended Lea Castle and Ferndale	Comment	Develop land at Lea Castle, with a new school/shops, as a standalone community. Also fully utilise the sites of Sion Hill School/former Sladen School and develop land to the west of Wolverley Road towards Sion Hill. Land to the north/west of Kidderminster (Ferndale) should also be considered.
	LPPO1813	Alternatives	Comment	There are plenty of Brown sites around WFDC area you have the old school of Sion Hill/Sladen, the Old hospital Wolverhampton Road and the amount of property that could be used for residential around the area is ample for any district.
	LPPO1847	Lea Castle	Support	I totally support Lea Castle sustainable village.
	LPPO2846	Selba Drive	Object	<p>We wish to <u>object</u> in the strongest possible way to the inclusion and any consideration given to the “Land off Selba Drive — Kidderminster” in the local plan review.</p> <p>Any building work on this land will severely disrupt an important local community amenity with no substitute in the surrounding area. I will, in particular, draw your attention to the following issues:</p> <ul style="list-style-type: none"> • Daily, children of all ages play on the field. It is a safe area as there isn't any through traffic and there is an infrequent movement of vehicles in the cul-de-sac. Other green areas in and around the Habberley Estate are designated 'No Ball Games' and not big enough. • It is used daily by local people to walk their dogs, to exercise and to relax with friends. • Habberley Estate has little or no identified play areas that are easily and safely accessible by children and parents.

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				<ul style="list-style-type: none"> • Infrastructure on Selba Drive would have to be revised. Any extra volume of traffic would have a detrimental effect on residents and the environment; this would have to be negated. Drainage would also have to be repurposed, currently rainwater from Selba Drive and the Habberley estate drains onto the road and into the field, causing some flooding. Without this run off, the effect on the existing residents could be catastrophic. • At a time when our population needs more open, green areas, this open green area is being considered for development. • We are of the understanding that when the original Kdderminster Self Build Association, who built the houses on Selba Drive, gave land to WFDC, it was to be used as open use land and not to be built on. We are currently waiting on a freedom of information request and pursuing the documentary evidence of this. <p>We very much hope that this area is removed from the local plan.</p>
Gladman Developments Limited	LPPO1431	para.6.57 additional sites	Comment	<p>Gladman believe there is a clear need to plan for more housing allocations than set out in options A & B. Large-scale sites proposed require release from Green Belt plus significant upfront infrastructure. Need to ensure there are no shortfalls in housing provision, especially in early years.</p> <p>BW believe OAHN should be 332 dpa. There are also clear links with Black Country and wider Worcestershire area. Also more flexibility should be built in to allow for sites not coming forward as anticipated. A 20% uplift is often suggested by Local Plan Inspectors.</p> <p>Suggest that site selection process is revisited and additional allocations made. This will help to secure rolling 5 year housing supply.</p>

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Gladman Developments Limited	LPPO1435	Additional site - Areley Common	Support	Gladman seeks allocation of land at Areley Common (8.32Ha) which straddles boundary with Malvern Hills DC. 0.9Ha is in WFDC. The consideration of sites alongside the District's main settlements is vitally important and in cases where administrative boundaries run close to the settlement edge, it is vital that this is effectively managed through the duty-to-cooperate in local plan making. HELAA (AKR/13) considered development was achievable. Outline application 17/0045/OUTL proposed up to 125 dwellings plus C2. The site is well contained with defensible boundaries including hedgerow to the southern boundary, woodland to the east and existing residential development to the north and west. In accordance with NPPF the site is deliverable, available and offers a suitable location for development now.
Strong Farms	LPPO870	Site submitted - Land off Castle Road, to the South of Cookley	Comment	Call for sites form submitted - Land off Castle Road, to the South of Cookley.
Strong Farms	LPPO871	Site submitted - The Barracks, Wolverley Road, Wolverley	Comment	Call for sites form submitted - The Barracks, Wolverley Road, Wolverley.
Yew Tree Walk Ltd	LPPO745	Site submitted - Yew Tree Walk, Stourport	Comment	<p>Call for sites submission - Land at Yew Tree Walk, Stourport.</p> <p>The site was previously put forward in response to the Council's call for sites and was included in the Council's Housing and Economic Land Availability Assessment 2016 (HELAA). The HELAA identifies that the site is previously developed land (PDL) (a brownfield site) and that it is within the Green Belt. As this site at Yew Tree Walk is PDL, it is therefore requested that it be included on the brownfield register that is being prepared for Wyre Forest.</p> <p>The HELAA 2016 also identifies that 18% of the site is covered by a TPO (2013) and 25% of the site is within Flood Zone 3. Note that these proportions are based on the red line area that was submitted as part of the call for sites. The</p>

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				<p>Promotional document submitted demonstrate through an Illustrative Masterplan that residential development can come forward on the majority of this site outside of the areas covered by the TPO and Flood Zone 3.</p> <p>The Preferred Option Sustainability Appraisal scores the site well against a number of objectives, including improving health and well-being, improving and enhancing the provision and accessibility to local services, meeting housing needs, promoting energy efficiency, protecting agricultural land, protecting and enhancing landscape/townscape and also maintaining and enhancing community and settlement identities. The SA does however score the site a major negative with regards to flood risk and a minor negative with regards to biodiversity. This scoring is based on the red line area contained within the HELAA.</p> <p>Informed by the SA and HELAA, para 6.47 of the Local Plan Review Preferred Options Document (June 2017) sets out that sites which are considered unsuitable (for example because of flood risk), are not viable or not deliverable have been excluded from the preferred options. Yew Tree Walk, is not currently identified as a preferred allocation in the Local Plan Preferred Options Document. In line with para 6.47 of the Preferred Options Document it is assumed that despite the site being PDL and appropriate for Green Belt release, the site has been discounted due to the fact the evidence base identifies the site as unsuitable given it is partly located in Flood Zone 3 and partly covered by a TPO. Such an assessment has been based on the red line area submitted to the call for sites which does not reflect the actual developable area of the site. In reality the Flood Zone 3 and TPO constraints do not cover the majority of the site. Sites should not just be discounted because part of the site falls within Flood Zone 3.</p> <p>The majority of the site is unconstrained PDL. The Illustrative Masterplan submitted as part of these representations demonstrates how a suitable residential development can come forward on this site. The red line area has now been revised from that shown in the HELAA to more accurately reflect the developable area of the site. This change to the red line is set out in the Promotional Document and sets out that built development can come forward</p>

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				<p>outside of the constrained areas. In light of this change the Council should revisit the sites scoring in the SA and reconsider this brownfield site for allocation. Note that this change has no impact upon the capacity of the site.</p> <p>The HELAA 2016 identifies that access would need to be through the adjacent housing estate off Yew Tree Walk. A Transport Technical Note has now been prepared by WSP which has been submitted as part of these representations. This note establishes that access from Yew Tree Walk can be provided for a proposed development of up to 85 dwellings.</p> <p>The site at Yew Tree Walk is sustainably located, is PDL and is on the edge of Stourport-on-Severn. The site is within the Green Belt, however in the context of the need to release land from the Green Belt to meet housing needs, it has been demonstrated that the release of this site would not compromise the role of the Green Belt. Given that development should be targeted towards Kidderminster and Stourport-on-Severn as the principle settlements, Green Belt sites such as Yew Tree Walk which are in sustainable locations, are unconstrained (as demonstrated in this letter), and particularly those which are PDL, should therefore be identified as suitable residential allocations through the Local Plan Review.</p>
	LPPO2419	6.57 Alternatives	Object	<p>There are so many sites in Kidderminster which can be built upon or regenerated. Spread out over a wider less destructive plan and included in option B. For example:</p> <ul style="list-style-type: none"> • Sladen school site • Sion Hill school site • Huge empty previously "sea line" unit of the A442 Worcester road • The old glades site (we don't need a cinema) Council have said it themselves we need homes on brownfield sites first. • Old brintons carpet site • Crown House

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				<ul style="list-style-type: none"> • empty shops down the complete length of High Street. The empty previously "Barber-Ella hair salon" unit and flats opposite the town hall. • Soon to be empty Debenhams building in weavers wharf <p>This would create a wonderful canal side residential town much like the Birmingham canal site which is thriving with bars and shops.</p> <p>Lets regenerate our town in a more modern less destructive way and bring young commuters in this way, who live in the centre, next to shops, bars, restaurants, and the train station.</p> <p>This would prevent traffic issues, over development of the already large Spennells estate. Spreading out the need for doctors, schools and policing needs evenly.</p>
	LPPO868	Site submitted - Adj. Red Lion Court, Bridgnorth Road, Arley	Comment	<p>Call for sites submitted - Adjacent to Red Lion Court, Bridgnorth Road, Arley. Former overflow car park for the Red Lion Inn (Red Lion Inn falls into Shropshire and has been developed for residential).</p> <p>The WFDC Core Strategy identifies the need for affordable housing and highlights a shortage as being a particular issue in the rural areas of the District where average house prices are highest. Policy CP04 encourages a proactive approach within rural areas. Furthermore policy DS04 again highlights the pressing need for affordable housing in the District's villages, rural settlements and other rural hamlets.</p> <p>The Wyre Forest Site Allocations includes policy SAL.DPL2 which identifies affordable housing in response to an identified local need being permitted as an exception to the general presumption against residential development in rural locations.</p> <p>Having established in the Core Strategy that there is a shortfall of affordable housing with the District overall, and furthermore, that the pressing need is felt most acutely in rural areas I would welcome your view of this site being advanced</p>

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				as a rural exception site for affordable housing. I am also aware that the recent Housing Bill seeks to promote automatic planning permission in principle on brownfield sites to bring forward more land to build new homes quicker.
	LPPO1824	6.57	Comment	Have all the brownfield sites in the Wolverley / Cookley area been explored e.g Brown Westhead Park and the area on the opposite side of the road which I believe was the site of the Old Quarry? The same demands would be made on infrastructure but surely it makes sense to look at these areas rather any Green Belt locations.
	LPPO756	6.57	Comment	Why not include the section of land opposite Bunkers Hill i.e. the Eastern Section in Core Site? Not Highclere? Already planning permission for Safari Park Development on Bunkers Hill so would seem logical.
	LPPO704	Site submitted - North of Birmingham Road, Kidderminster	Comment	<p>Suggests site north of Birmingham Road, Kidderminster, located opposite core employment site WFR/CB/7. The land identified extends to approximately 8.9ha. Further land to the north and west could also be available.</p> <p>We confirm our clients are positive in respect of gateway development for the approach to Kidderminster on the Birmingham Road. The land area identified could provide a mixed use opportunity of employment generation, residential and/or retail as part of the overall development to the east of Kidderminster. Accessibility by virtue is excellent, land area is flat and available at short notice.</p>
Price, Price, Findley & Dormer	LPPO705	Site submitted - Land off Snuff Mill Walk, Bewdley	Comment	<p>Suggests new site - Land off Snuff Mill Walk, Bewdley.</p> <p>There is an area of underutilised land extending to approximately 3.5ha adjacent to the Bewdley Town centre boundary, as shown edged in red on the attached plan. Existing residential development adjoins, but the topography of the site would make development unobtrusive to neighbours. A sympathetic low density scheme would be proposed looking to complement the adjacent conservation site,</p>

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				with particular thought to retirement accommodation that is needed within Bewdley. Topography limitations and preservation of screening and natural features further benefits the site and would give ample opportunity for amenity areas to be created in association with such a scheme. This site is envisaged to be suitable for low density development.
Hardwick & Prosser	LPPO714	Site submitted - 164 and 165 Sutton Park Road, Kidderminster	Comment	<p>The draft documentation, paragraph 6.2, acknowledges that it will not be possible to be entirely reliant on brownfield land. There will be a requirement for greenfield land take and it is preferable to create a scheme, such as that proposed at Sutton Park Road, within a residential development boundary, surrounded by residential use and in a sustainable location in comparison to releasing greenfield sites such as fields which adjoin a residential development boundary. For this reason we believe the site (164/165 Sutton Park Road) would be preferable to some options in the consultation document.</p> <p>This site, as a whole, would create a good boost to local housing supply as well as a viable scheme for a developer assisting its delivery. It is important to bring forward allocations of varying sizes too in order to allow varying builders and/or developer to bring them forward to create a variation of sites available in terms of design, layout and pricing to create some variety for the market.</p> <p>I note, from a previous application on 165 Sutton Park Road (acknowledged in the attached form), that an application for residential use was recommended at committee for refusal but I believe it was withdrawn, The reasons for refusal varied but essentially the application was very poorly put together - submitting too many dwellings on the plot and failing to leave sufficient space for access, parking turning as well as being unable to comply with the relevant design guides at the time. Any new proposal should be viewed on its merits and not with this previous history in mind. It is noted that there are a number of TPOs on site but it is not to say, given the larger site, that these cannot be successfully retained with the guidance of a qualified arboriculturalist.</p>

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				<p>Furthermore I note there was concerns over access. Having spoken to planning officers about this site, during pre-application advice, it was considered there may be overall potential as part of a land assembly project which could include The Grange (Care Home for the Elderly) which adjoins the site. It is also understood that no. 163 has queried potential for development of this site. Overall — 164 and 165 Sutton Park Road could contribute to a successful housing scheme as has been the case in recent years off Sutton Park Road (examples including The Croft). Overall this site is one which represents a sustainable location for development with minimal impact or impacts which could successfully be mitigated.</p>
Peacock & Devitt	LPPO710	Site submitted - Land South of Fairfield Lane, Wolverley	Comment	Call for sites submitted - Land South of Fairfield Lane, Wolverley.
	LPPO711	Site submitted - Bentley Grove, Curslow Lane, Kidderminster	Comment	<p>Call for sites form submitted for land adjacent to Bentley Grove, Curslow Lane.</p> <p>This land is delineated on the attached plan. The land edged blue comprises a single dwelling and its curtilage; and the land edged red is managed grassland. These representations relate to both parcels.</p> <p>The land does not feature in the Council’s 2016 Housing & Economic Land Availability Assessment but the owner is keen to see the land brought forward for development as soon as possible.</p> <p>Published evidence & other material which informs the Preferred Options demonstrates that there is a clear need to allocate a substantial amount of additional land for new housing; and that this need cannot be met without releasing for development a significant amount of land that is currently within the Green Belt.</p>

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				<p>The Council’s approach to addressing this challenge needs to consider all options available and the potential of releasing land in the Green Belt which is of little functional value or landscape importance should be seriously explored. New housing can help sustain currently less than sustainable patterns of development, for example by making public transport serving the existing network of rural settlements more viable and by supporting local businesses & services.</p> <p>Such development at a relatively modest scale would not detract from the thrust of whatever overarching spatial strategy is pursued and should be supported as making a positive contribution to meeting both rural policy objectives and Borough wide housing needs.</p> <p>The land at Bentley Grove provides a good example of where such development could take place. The site</p> <ul style="list-style-type: none"> • lies within the hamlet of Mustow Green close to the villages of Harvington and Chaddesley Corbett and its development would help sustain those settlements, notably by improving the viability of existing bus services (42 & 133) which run through the area to Kidderminster & Bromsgrove and by supporting local businesses & schools • is of little functional or landscape value, containing no productive farmland or mature trees or hedgerows • could be easily accessed from either Curslow Lane and/or Bromsgrove Road and has no known physical or other constraints on development <p>Therefore the Council is urged to give positive consideration to the allocation of the land known as Bentley Grove for residential development in the Local Plan Review.</p>
	LPPO713	Site submitted - Land	Comment	Call for sites for submitted for Land adjacent to The Wain House, Lye Head, Rock

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		adjacent to The Wain House, Lye Head, Rock		
Wyre Forest Community Housing	LPPO733	Site submitted - Severn Grove, Kidderminster	Comment	Call for sites form submitted - Severn Grove, Kidderminster
Wyre Forest Community Housing	LPPO735	Site submitted - Queens Road, Stourport	Comment	Call for sites form submitted - Queens Road, Stourport
	LPPO2421	Alternative sites - brownfield	Comment	<p>Plan states “there is insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the necessary housing and employment growth required in the plan period.”</p> <p>There are brownfield sites not in the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster.</p>
	LPPO2857	Alternative Options	Comment	Brownfield sites could create housing developments. New housing must be affordable for local young people trying to get onto the property ladder. Flats and apartments in empty shops in Kidderminster town centre would be better. Build bungalows to free up family homes. Do not destroy our countryside.
	LPPO2862	Proposed alternatives	Comment	Plans not focused on need for centralised high density housing in Kidderminster rather than low density housing on greenfield land. Half of the tower blocks were demolished in the Horsefair. The majority of housing plans since have been low density out of town estates moving the population out of the town centre, increasing traffic into the centre and requiring the construction of additional link roads. The plan should promote centralised housing development that reduces the

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				<p>dependency on car travel and lowers Co2.</p> <p>Rural bus service in Cookley has been threatened. If more people live out of town we are not solving the travel issue or supporting the communities requirements for easy travel to work/school.</p>
	LPPO2889	Extended Lea Castle	Support	<p>I would support a 'Spennells type' development on the Lea Castle site, expanding the current proposal. A full development on that site would support a primary school. Creating a 'second Spennells' on the Lea castle site would have less impact on local residents as it could be self-sustaining providing shops and live/work units providing employment opportunities. Lea Castle site has better road access, between two A roads it already has the necessary road infrastructure as the Wolverhampton Road and Stourbridge Road are already linked. This means there would be no 'rat runs' created through residential streets.</p>
	LPPO1899	Lea Castle	Comment	<p>I propose that the new development should be built on the Lea Castle site as this would then connect with the Wolverhampton Road, allowing a small community to be built that would be large enough to support a primary school and be able to have a better bus route and create a village atmosphere. It would also be in the Wolverley High school catchment area which would allow the school to prosper too.</p>
	LPPO2636	Alternative sites	Comment	<p>I would like to suggest the following sites be added into the core plan.</p> <ul style="list-style-type: none"> • The whole of Worcester Street from Coventry Street up to the old magistrates court. This area of Kidderminster's town centre is currently 'dead'. Redeveloping these empty shop units as housing would revitalise other areas of the town centre, making it a more vibrant place to visit. • Disused factories at various sites including Green Street and Park Lane. • In Bridge Street Stourport, the large retail unit formerly occupied as an

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				indoor market. It has been empty for several years and is now in a state of chronic disrepair. It would therefore be an ideal site to develop, similarly to what WFDC are currently doing in nearby New Street.
	LPPO2812	Extended Lea Castle Site	Support	Support proposals for a Lea Castle Sustainable Village which is an option that should be considered
Strong Farms (LS) Ltd	LPPO873	Site submitted - ExCamp, Land Off Brown Westhead Park Road, Wolverley	Comment	Call for Sites form submitted for ExCamp, Land Off Brown Westhead Park Road, Wolverley.
	LPPO2920	6.57 Alternative options	Support	If really necessary the old Lea Castle site could be used for affordable housing, as all the Utilities are in place, along with a road structure. A new school could be built on the old Sion Hill site, providing education for children on the new estate.
	LPPO2393	6.57 Alternatives	Comment	<p>The amount of building proposed seems excessive. I can't see many people wanting to move into Kidderminster unless the town has more to offer them. Parts of the town have been neglected for far too long and have become an eyesore. Many people use Kidderminster for the large supermarkets and little else.</p> <p>If it is really necessary to build in such numbers, I don't understand why the plans do not include much more building of homes and employment opportunities in the town centre. If the population is going to increase vastly, then the town has to be improved. If houses are built round about, I fear that the town will be even more soul less and become a commuter town with an empty centre.</p> <p>I welcome the improvements that are going to start soon to the railway station and this will be a big draw for commuters coming in and out of Kidderminster.</p> <p>On the plans, the Lea Castle site is marked for development. Why can't this area</p>

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				<p>be expanded to form a proper little village? It could have a primary school, a few shops, a GP surgery and a starter industrial units. Major roads are already there, and a bus service would also be viable. This would avoid all the strain that building in soul less patches around the town would cause. The school at Offmore is full to capacity the GP surgeries are all stretched. If planned properly Lea Castle village could have a heart with a purpose built school, a medical centre. It could become a place where families really would choose to live, work, and play.</p> <p>It seems that there is no plan to develop the north west of Kidderminster, I can't understand this.</p> <p>I support the call for the use of brown sites in and around the town of Kidderminster and also a village in and around the Lea Castle site.</p>
	LPPO2423	Selba Drive	Object	<p>I was disturbed to discover that under the Local Plan review so many smaller sites were being included for consideration without any mention to those living close by.</p> <p>I therefore wish to strongly object to the inclusion of the "Land Off Selba Drive" HELAA Reference number: BHS/22. I am objecting on the grounds of <u>poor access</u> and what I consider to be a <u>dangerous erosion of local amenities</u>.</p> <p>With the removal of the public house, the Catholic Church and St Johns annex there is no longer any facility within the Habberley estate apart from the private club and a small scout hut. The Habberley estate has lost a venue for people to meet and congregate, removing any exercise or family option's, from coffee mornings and parties through to Zumba, all have now disappeared.</p> <p>And now there are plans to remove the only free open space on the estate where children can safely play within hailing distance and in reasonable view of a good</p>

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				<p>number of homes.</p> <p>Land used for exercising the dog, playing cricket and football so to remove this amenity would be a considerable loss to this area, once again forcing people to take transport to go outside of the local area, using their cars and thus contributing to a negative environmental impact within the Wyre Forest district area.</p> <p>Residents would also suffer from the addition of extra vehicles on already overcrowded roads with people parking on pavements, verges and anywhere else they can find that is safe to leave their vehicles.</p> <p>Selba Drive and the roads that lead to it are not wide enough to provide access for the additional cars and people. Westminster Drive is almost none negotiable on occasions and there is the expectation of extra vehicles parking on Truro drive and Canterbury Road generated by the occupation of the new homes on the old pub site. Making the fearful prospect of Emergency vehicles being unable to reach properties at those crucial times, when so often needed.</p>
	LPPO2168	6.57	Comment	Brownfield sites should be looked: Sion Hill School, The lion's Fields and Crown House.
	LPPO2186	New area suggested - Blakedown	Comment	If there is an absolute necessity for housing I believe the area surrounding Blakedown should be considered – there are existing transport links to Birmingham and Worcester from there.
	LPPO2648	Lea Castle - whole site	Support	If more houses are needed I propose they are built on the Lea Castle site creating a self contained village with its own school, shops and GP practice. But I believe there needs to be much more investment in the local NHS to support more people moving in.

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	LPPO2308	Alternatives	Object	<ul style="list-style-type: none"> • brownfield sites should be developed first • In town centre empty shops used for housing as the need for retail units is diminishing . • jobs are required, currently there are empty factory units ie easter park.offices are empty in green st. • Housing needs to run in conjunction with employment • Do something about employment. • Preserve Green Belt not build on it.
	LPPO2587	6.57 Alternative Sites	Object	<p>As an alternative I would like to propose the use of land at Lea Castle, this could be extended to use land up to the Wolverhampton Road and at the rear of the Lea Castle site, extending up to Axborough Lane. There could also be some development on the Western side of Wolverley Road towards Sion Hill which would link with the development at the Sion Hill Middle School site.</p> <p>This development could create a sustainable village with all the required infrastructure to support it, a village centre and a primary school. The village would be able to sustain a bus service and would not impact on the community of Cookley.</p> <p>In addition to this I feel that, WFDC should propose some degree of development on the north/west of Kidderminster and feel it would be reasonable to develop land at the rear of the existing Ferndale estate which could accommodate 100-200 houses.</p>
	LPPO1462	Lea Castle Sustainable Village - Policy 31	Support	Supports Lea Castle Sustainable Village.
	LPPO2601	6.57 Alternative Sites	Object	Other sites, such as Lea Castle would be large enough to warrant their own, new amenities and therefore not add pressure to other locations or require constant

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				<p>trips into the town.</p> <p>Other sites already have existing plumbing and sewerage - Lea Castle, Sladen School site, Sion Hill school site, industrial units off Stourport Road, other disused factory sites within central Kidderminster.</p> <p>These other sites are an eyesore, that attracts vandalism and metal theft, and should be used first, before fresh green sites are even considered. Why haven't they been built upon if housing is so urgently needed? Please ask the building firm why?</p> <p>The majority of employment is based nearer other parts of Kidderminster.</p>
	LPPO2080	East of Kidderminster - Lea Castle Extension	Support	<ul style="list-style-type: none"> • Supports Lea Castle site. • Could create sustainable community with new school and bus service.
	LPPO2190	Lea Castle	Support	<ul style="list-style-type: none"> • Lea Castle would be a better proposal.
	LPPO1463	Lea Castle Sustainable Village - Policy 31	Support	Feels Lea Castle Sustainable Village is the best option for new housing.
	LPPO2759	6.57 Lea Castle	Support	<p>I think an alternative proposal to use the Lea Castle Site is more suitable.</p> <ul style="list-style-type: none"> • it is a larger site with room to include a central communal and commercial area, • It's size could provide many more houses, of varied size and price, and also support a large primary school within the catchment for Wolverhampton High. • It would not rely on one major road to access, nor major construction to provide sufficient access.

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				<ul style="list-style-type: none"> Redevelopment of this site would provide an opportunity to use unused land in the true spirit of regeneration.
	LPPO2788	6.57	Comment	<p>Justification 31.1 states “there is insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the necessary housing and employment growth required in the plan period.” I would counter that:</p> <p>There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster.</p> <p>I strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.</p>
	LPPO2963	6.57	Comment	<p>Development should be dispersed across the district as equally as possible so that no one area alone has to bear the brunt of the associated negatives. Use only greenfield sites where there is no public access to lessen impact on loss of recreational use.</p>
Offmore Comberton Action Group - Local Plans	LPPO1568	Site suggestion - Rear of Ferndale Estate	Comment	<p>We believe WFDC are wrong not to propose ANY development on the North/West of Kidderminster. We feel that 100-200 houses could quite reasonably be developed at the rear of the existing Ferndale estate and would have easy access to the A449 at the Lea Castle cross roads.</p> <p>We believe that our alternatives will create viable and sustainable communities, protect valuable, productive farmland, preserve endangered bird species and other wildlife and, by prioritising Brownfield development, ensure that our towns</p>

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				and town centres are viable and thriving.
	LPPO2946	Lea Castle & Hurcott ADR	Support	<p>Advantages of alternative option at Lea Castle brownfield site and Hurcott ADR.</p> <ul style="list-style-type: none"> • Current proposals for Lea castle site are for only 600 houses and those proposals avoid rather than tackle the issue of underground tunnels at the site. Development would impact the residents of Cookley village, with increased need for primary school places and other facilities. If the development of Lea Castle site extended to Axborough Lane and included 2000 – 2500 houses, then this should provide enough profit to address the issues of the tunnels and would result in the development of a sustainable community with its own primary school, shops etc, similar to when Spennells was developed. This would support a village centre which whilst in Cookley Parish would not produce a burden on that community. • Where 2500 houses are developed the developers contribute to road improvement which could address the issues of Hurcott Lane / Hurcott Road. • The expansion of Lea Castle development would be capable of sustaining a bus service. • It would be in the catchment area of Wolverley High School which is currently undersubscribed and would positively impact on the schools long term viability. • A large site would also be able to provide a combination of affordable housing/social housing as well as Larger more executive homes ensuring that the housing needs of all residents and communities are met. <p>I would also like to stress that WFDC should not build on any Green Belt land until all brownfield sites have been developed first. Consideration should also be given to regenerating the old part of Kidderminster town centre to utilise unused shops etc for conversion into flats/apartments. Why can't some of the existing retail</p>

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				shops have accommodation converted above the premises similar to properties in London and other large cities. Weavers Wharf has been developed and regenerated. Young people would be attracted to living in a cosmopolitan type of community where residential flats/apartments are developed amongst restaurants, wine bars and coffee shops etc.
Wyre Forest Community Housing	LPPO1685	New Site Suggestions	Comment	<p>We recommend the inclusion in the Plan of the following sites:</p> <ul style="list-style-type: none"> • Severn Grove, Kidderminster - This site, owned by TCHG, is included in the site allocations policy but not referenced in the Local Plan Review we would expect to see its inclusion as a core site. • Queens Road, Stourport -This site, owned by TCHG, is included in the site allocations policy but not referenced in the Local Plan Review we would expect to see its inclusion as a core site. • Yew Tree Walk, Stourport – We are in discussion with the owner of this site and believe that the site should be incorporated into the Local Plan Review as a Core site. • Rock Works, Kidderminster – We are in discussion with the owner and believe that the site should be forward incorporated into the Local Plan Review as a Core site. • Selba Drive, Kidderminster – This site, owned by TCHG, should be incorporated into the Local Plan Review as a Core site.
	LPPO2002	Lea Castle - Sustainable Village	Support	Supports the Lea Castle ‘Sustainable Village’ idea.
	LPPO2034	Lea Castle - Sustainable Village	Support	Use Lea Castle site and Sion Hill School sites for Sustainable Village saving Green Belt land.
	LPPO2045	Extended Lea Castle and	Support	<u>Lea Castle:</u> already has several access roads and is currently overgrown, underused

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		Ferndale		<p>and a magnet for anti social behaviour.</p> <p>Could include school/would have less impact on the countryside and wildlife/negate cost of upgrading road system.</p> <p>Build houses not factories/industrial units</p> <p><u>Ferndale:</u> Support, smaller so less impact, no need to upgrade road.</p>
Spennells Against Further Expansion	LPPO1739	New site suggestion	Comment	We are reliably informed that an offer to vacate Kidderminster Harriers Football Club has been made by the Club to the Council and has been put forward as additional land for housing development, conditional on the football club being allowed to move to the training ground as an alternative venue. We suggest this be added to the existing brownfield sites to be used for residential development.
Spennells Against Further Expansion	LPPO1741	6.57 - site suggestion	Comment	Development of an entire rural village on Lea Castle Hospital and School site.
	LPPO4412	Alternatives	Comment	I would challenge that not enough brownfield sites are available. There is still room for further development on the Silverwoods site and the Lea Castle campus. Also, Burlish Top Golf Course has been closed for about a year and, I believe, will not open again as a gold club viable for business venture, as there is already sufficient provision in the area. It is common knowledge that the golf course is not viable agricultural land as it is of very poor quality and would provide space for hundreds of homes (and possible school). There is also the old Parsons Chain site in Stourport, at present it is being used by Severn Trent Water to store pipes etc. for the Birmingham Relief Project. However, that will be completed in a couple of years at most, leaving the site empty again, I assume.

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	LPPO3268	Brownfield	Support	Brownfield sites available not listed in the plan. What about locating more development in other areas, such as Wolverley, Franche, Bewdley, Stourport and others?
	LPPO4583	6.57	Comment	There are Brownfield sites that are not even on the plan, for example Brown Westhead Park; and the site of the old quarry on the opposite side of the B4189 to the above site. I also strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.
	LPPO4842	Extended Lea Castle	Support	Alternative sites need to be given greater consideration, Eg brownfield sites esp Lea Castle.
	LPPO4610	Extended Lea Castle	Comment	An alternate option would be to develop the Lea Castle site increase some of the land to make it into a sustainable community. To develop an eastern bypass around the A449 / A450 junction which would help alleviate traffic / pollution along the Chester Road corridor.
	LPPO4399	Alternative Sites	Comment	Recommend that in achieving dispersal of housing, further areas are considered. For example Blakedown, conspicuous by its absence, has good rail connection with its station. Harvington & Chaddesley Corbett have good road connection to Birmingham, Bromsgrove & Worcester. All are capable of accommodating medium developments with little impact on the nature of the villages. The expanded Lea Castle site within Option B is preferable to the smaller allocation identified in Option A.
	LPPO4227	Alternatives	Comment	Kidderminster has many brownfield sites to build on and the existing building on the old sugar beat site and for example the area where the Glades was sited which may bring life back to a what seems to be a dying town.
	LPPO4228	Alternatives	Comment	Brownfield sites should be used first.

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	LPPO4778	6.57 Alternative Sites	Comment	<p>I support the regeneration of the area around the former Glades and Magistrates Courts, principally for apartments. I feel the proposal for a multiplex cinema is out of proportion with the demand in the District, which is already met by a regional company. Additional shops and restaurants in this area are not desirable or economically sustainable. Many other attractive old and empty buildings are ideal for conversion to attractive town centre living.</p> <p>There is waste land where Sladen School on Hurcott Road once stood as this was demolished in 2009. This is also the case for Sion Hill School where planning permission has been granted on this site but progress has not been made. Stourport also has a number of brownfield sites which are in need of development in order to meet some of the local housing needs of a growing/developing town centre. The now defunct Wyre Forest golf course has released some land and there is no reason why the whole of it should not be released for housing development. Growth of Stourport will require improvement in infrastructure, in particular public and private transport provision.</p> <p>Consideration should be made of small-scale development at Blakedown, Chaddesley Corbett, Harvington or Wolverley which would provide the opportunity for improved, sustainable facilities and services for those villages. I support development of a new community on the Lea Castle Hospital and School brownfield site, provided that:</p> <ul style="list-style-type: none"> • Consideration is given to the local environment and ecosystems; • The development is built with good housing principles (as described in section 14, below); • The local community is fully engaged with planning the development; • Infrastructure, such as transport, schools and GPs are provided. <p>Crown House on the Bull Ring in Kidderminster and the timber yard on Park Lane</p>

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				are significant examples of brownfield sites which should be in the Local Plan. Should the land owner not be amenable to housing development then I urge the use of Compulsory Purchase Orders. The Council must make more effort in identifying suitable brownfield sites.
	LPPO4229	Alternatives	Comment	IF YOU HAVE TO BUILD THEN LEA CASTLE SHOULD BE BUILT ON AS IT HAS BEEN BUILT ON PREVIOUSLY .
	LPPO4806	Alternatives	Comment	The Preferred Options Document shows a small part of the golf course between Kidderminster and Stourport (formerly Wyre Forest GC and Birchen Coppice GC) for house building. Surely the whole of the golf course should be used as I understand it is in liquidation, has land owned by WFDC, is unsuitable for agriculture, is not in the Green Belt and is not an essential leisure facility, as there are an abundance of golf clubs in and around Wyre Forest all looking for new members. The area is vast (about the size of Spennells) and could accommodate a separation zone between residents at its Stourport boundary.
	LPPO4807	Alternatives	Comment	There are areas to the north of Kidderminster not considered in the options document, because of the fixation for an eastern relief road. An example that should have been considered is at Habberley where the community is shielded with a road and verges.
	LPPO4384	Alternatives	Comment	Could the area of Lea Castle included in Option B not also be included in Option A?
	LPPO3549	Alternatives	Comment	There are sufficient current and future sites on brownfield land, (lea castle, Kidderminster Town Centre and outer areas) To be used first. I would like to see regeneration in Kidderminster Town Centre bringing communities into the Town.
	LPPO3479	Lea Castle	Support	The Lea Castle Hospital site should be enlarged to develop a larger and more sustainable housing.

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				<p>It would also enable the development of</p> <ol style="list-style-type: none"> 1. A two form school 2. Doctors surgery 3. Bus Service to and from Kidderminster 4. Local Shops
	LPPO3343	Alternatives	Comment	Must use existing brownfield sites in Stourport.
	LPPO3388	Alternatives	Comment	Housing can be built on brownfield sites.
	LPPO3976	Extended Lea Castle	Object	<p>I would suggest as an alternative to building around Offmore & Comberton, a bigger site at Lea Castle. The Plan currently proposes using some of this land in both Option A and B but I would suggest combining the land under both options and then extending the site to include land up to the Wolverhampton Road and at the rear of Lea Castle up to Axborough Lane. There might also be a possibility of further development on the western side of Wolverley Road towards Sion Hill, which would link with development at the Sion Hill School site. With this proposed land, including the sites in that vicinity already included in the Plan, a sustainable community of around 2,000-2,500 houses could be created. This would be large enough to support a 2 form entry primary school within the catchment of Wolverley High School (thus positively impacting on the school's long term viability) and a sustainable bus service. It would also support a 'village' centre within the Cookley Parish without putting a burden on that community and would potentially be able to support live-work units.</p>
	LPPO4628	Alternative Sites	Comment	Kidderminster town centre is in desperate need of regeneration and perhaps using land closer to the town centre will help invigorate it and mean that we don't just

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				have charity shops and empty shops.
	LPPO3662	Selba Drive	Object	As a resident of more than 20 years I am fully aware of how frequently this amenity land is used by residents of the whole estate from children playing football, dog walkers, parents with very small children to safely run around and many other recreational pursuits. The only other area on Habberley Estate is the play area behind Habberley Club which is not big enough or suitable for any of these activities. All other land around this area is privately owned and not accessible by right to the public.
	LPPO4061	Alternatives	Object	<p>Bewdley can contribute to additional housing needs not by building on identified greenfield sites but by amongst other things:</p> <ul style="list-style-type: none"> • Conversion of workhouse in High Street and derelict underused neighbouring land near the R.C.Church into flats • Imaginative use of the Dog lane site not just for parking but small scale housing in keeping with existing Dog Lane historic cottages and possibly some small business premises etc. • Wholesale redevelopment of Bridge house/surrounding Rowing Club site in Wribbenhall and adjoining camping site to maintain some business/sport related capacity but also to create significant additional housing - hopefully more in keeping with and enhancing older existing housing along this part of the river . • Renovation/conversion of empty retail properties into flats e.g former HSBC site • Renovation of Ribbesford House
	LPPO4075	Selba Drive	Object	Regarding the “Local Plan Review” in connection with the suggested proposal to build community housing on land adjacent to Selba Drive in Kidderminster.

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				<p>I wish to register my “Strongest Objection” to the proposal to use the land adjacent to Selba Drive for community housing for the following reasons.</p> <p>This area is frequented on a daily basis by children of all ages as it is a safe play area. This allows them to be involved in many different types of sports, games and other recreational pursuits. Safety is enhanced by the absence of any through traffic and infrequent vehicle movements in the Cul-de-Sac.</p> <p>The area is also regularly used by many adults for dog walking and exercising activities. In particular local residents acknowledge it as a place of peacefulness and somewhere to meet friends and relax.</p> <p>Habberley Estate has little or no identified play areas that are easily and safely accessible by children and parents.</p>
	LPPO4082	Alternatives	Comment	<p>Suggested proposal:</p> <ul style="list-style-type: none"> • Having looked at the proposal for the development of the Lea Castle site would it not be better to enlarge this development up to the A449 and Axborough Lane. This would then allow for a development along with the Hurcott ADR and any other additional parcels of land within the surrounding area (west of A449) a sustainable community of some 2000 homes which could be afforded its own ‘village centre’ thereby not impacting on Cookley. The A449 is a major trunk road that could easily accommodate any additional traffic with no on route villages to be affected. • This development would be significant enough to support its own primary school and with Wolverley CE High school on its doorstep answer the education development requirements.

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				The Horsefair is an eye sore and should be an embarrassment to any inspiring forward thinking Council that wants to promote Kidderminster as a town worth investing in. This is an area that should be fully reviewed and with careful planning could be a super development for both housing and leisure and a be a gateway into the heart of town rather than the eyesore it is now. Although it will not be too long before it can be developed if the collapsing of the old Post Office building is anything to go by.
	LPPO4595	6.57	Comment	<p>It appears from the press the Lion Fields is due to be offered for development of cafes, restaurants, leisure and cinema. This will introduce yet another 'centre' to Kidderminster. The town needs to be consolidated not made even more sprawling; we already have three centres, Weavers Wharf, Swan Centre (which appears to be dying on its feet along with Worcester Street) and the Rowland Hill Centre. Why can this large Brownfield site not be used for housing, which would effectively bring more people and life into the town centre.</p> <p>There are various derelict/empty Brownfield sites around the District. Where owners are not willing to 'offer these up for housing' why can't the Council issue Compulsory Purchase Orders on these sites, in order to protect our precious Green Belt?</p>
	LPPO4599	6.57 Alternatives	Comment	<p>Has anyone considered that to the north of Kidderminster there is an area which is between Habberley, Franche, Fairfield and Wolverley that has a lot of open land, little of it actively farmed and what looks like some brownfield areas. This area is serviced by the Bridgnorth Road (A442) with the B4189 giving direct access to Wolverhampton Road (A449) and Stourbridge Road (A451). I do not know whether these areas are Green Belt or not but I am aware that Wolverley School is short of pupils for the future, so in some ways these needs could be matched by some new houses locally.</p> <p>The Ferndale Estate built at the north of Franche, has the ability to cope with more</p>

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				<p>houses, with access roads already in place. Could this be considered for a larger community with many existing facilities available locally on the Franche Road nearby with direct access to the town, factories and Bewdley.</p> <p>There is an obvious choice for at Lea Castle Hospital, which is effectively brownfield. There are plans to build 600 houses. Surely if the whole site i.e the triangle of land from A449 -B4189 -A451 and topped off at Axborough Lane was used this would give a village community, that not only could it gain its own facilities, school, shops, Doctors and bus's etc., but would help nearby Cookley with its lack of Primary School places and top up Wolverley's shortage of older pupils.</p> <p>I gather that Sion Hill School site has now been sold to developers, so why not use the small parcel of land south of the B4189 in Broadwaters next to the A449 and make a worthwhile job of building houses in this area, which already has some level of facilities which would be available from day one.</p> <p>The centre of Kidderminster Town has so many possibilities for improvement that if we made an effort, the vibrancy would again return to what used to be a destination for shopping and entertainment.</p> <p>Worcester Street area is waiting to happencompletely rebuild all the shop fronts and above build back and fill with modern apartments for people to live in and enjoy the town, with access and parking from the rear in Bromsgrove Street. The proposed new cinema and eating establishment with parking is a great idea but some parking area needs to be kept for shoppers.</p> <p>At the Eastern end of Worcester Street there are buildings being left to deteriorate. Park Lane in town has old buildings and a canal, all around the country these areas are sought after to build new or converted apartments for modern</p>

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				<p>life.</p> <p>Green Street opposite Aldi there is another old building that lies empty waiting for a refurb. Maybe this could possibly be more apartments close to local amenities. Or a mini version of SALTS MILL which is located in Saltaire on the outskirts of Bradford. Crown House. Developers love to build on open land and don't want to get involved in what can be expensive and difficult work, surely this is a chance for one of them to shine.</p>
	LPPO4600	6.57 Alternatives	Comment	<p>Further building of houses to the Lea Castle Hospital site under Option B. We believe that this site could accommodate at least two thousand five hundred houses. The result of this would be a more 'sustainable village' environment with the following advantages:</p> <ul style="list-style-type: none"> • Would be within the catchment of Wolverley High school and would positively impact on the school's long term viability. • Would be large enough to support a two-form entry primary school. • Would support a village centre whilst not encroaching on the Cookley Parish. • Would be capable of sustaining a bus service. • Would potentially be able to provide live-work units. <p>In addition it is wrong of WFDC to not consider development on the north/west of Kidderminster. One to two hundred houses could be developed to the rear of the existing Ferndale estate.</p>
	LPPO4602	6.57 Alternatives	Comment	<p>I appreciate the need to increase the number of houses in the Wyre Forest but would suggest there are more suitable sites, with greater opportunities, local community services; employment etc...in closer proximity such as the Burlish Park Golf Course that has recently closed, or the development of the sites in</p>

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				Kidderminster Town Centre of the old Glades Leisure Centre and/ or Woolworths. And in Stourport there is again the site of the old Leisure Centre that has yet to be sold/redeveloped.
	LPPO4606	Extended Lea Castle	Support	<p>Lea Castle has been out of use since 2008 and is now a derelict site. I would welcome the redevelopment of the site to its own community as it previously was. Building on existing footprints alone, would not provide a community as these are spread distances apart across a huge site. Far more than 600 houses could be built. Extend this site up to the Wolverhampton Road, Axborough Lane and the Stourbridge Road and look at the option of developing the western side of Wolverley Road incorporating Site Hill site. This would mean that there would be enough houses for it to be a sustainable community which would be able to have its own primary school, shop etc, thus reducing pressure placed on existing services which are already at full capacity. This school could then feed into Wolverley High School and Baxter College which are able to accommodate additional students. The road structure is already in place to facilitate the development of this community and would be capable of sustaining a bus service. Live/work units could be included in these plans.</p> <p>Further develop behind the Ferndale estate to spread the development across Kidderminster.</p> <p>Instead of industrial units by Hodgehill nurseries, use existing sites such as Greenhill Industrial Estate, Hartlebury Trading Estate, Hoobrook etc where there are empty units and would be preferable to fill those first before building on Green Belt land.</p> <p>I strongly believe the above suggestions are a far more positive way forward, limiting the impact on local residents and existing services.</p>

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	LPPO4508	6.57 Alternatives	Comment	The obvious choice for your 1st phase would be Lea Castle and that area around Wolverley X roads/A449 as you already have good land available and the added use of a vacant school at Sion Hill.
	LPPO4522	Extended Lea Castle	Object	A larger development of the Lea Castle site as suggested by OCAG-LP would seem to merit serious consideration.
	LPPO3155	6.57	Object	As an alternative I would like to see a rejuvenation of town centre brown belt land for proposed housing development. The town, and areas close by, have much land that could be used to provide the housing growth demanded by the Government and also drastically improve the aesthetics of what is at the moment a very run down and derelict space.
	LPPO4645	6.57 Alternatives	Comment	<ul style="list-style-type: none"> - Put all 3000 dwellings on existing brownfield sites - Expand Lea Castle - Encourage division of barn conversions into smaller units. - Regenerate the town centre with affordable housing in empty buildings - Inc numbers of houses on Sion Hill school site
	LPPO1925	Lea Castle Hospital Extension	Support	<ul style="list-style-type: none"> • Supports extended Lea Castle site.
	LPPO3044	6.57	Comment	<p>The Woolworths and Littlewoods sites in Worcester Street should be purchased, compulsorily if necessary, to facilitate the building of a leisure complex in the existing town centre in order to help to rejuvenate the town centre, with multi-storey parking incorporated into the development. This would then free up the entire Lionfields site for residential development, including the old Victorian Market building which could be converted into in-town apartments, with local town shopping and railway access conveniently alongside.</p> <p>An alternative development would be for the Lea Castle Hospital site to be</p>

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				developed as a self-contained, out of town residential village site, initially on brownfield land and only if necessary, extending into Green Belt land within the third 5-year phase.
	LPPO3071	Suggestion for Town Centre and Lea Castle	Comment	<p>I also feel there are plenty of other sites which could be used like for instance lea castle, sion Hill school.</p> <p>What about building apartments in the town centre where all the empty shops are.</p>
	LPPO2996	Alternatives	Object	<p>As already identified it is good to read about the development of brownfield sites for residential dwellings; the District and especially Kidderminster town centre has declined and so utilising some of these buildings and converting them for affordable living will bring people back into the centre of town to utilise the town amenities and within walking distance use the added new attractions and eateries that the town has accommodated in central locations such as the alongside the River Stour. This should mirror the success that Worcester has achieved through their regeneration and riverside location with places such as Diglis where homes are affordable to buy and rent and are in the lower quartile of housing prices. Kidderminster and Stourport have their heritage to protect so revamping and converting industrial buildings would keep the integrity of the town and make the buildings both desirable and unique.</p> <p>The Lea Castle Hospital site is a site that should be developed and it was pleasing to hear the Conservative MP Mark Garnier agree with our vision to use this site. This area could be an ideal location to house a new village to support Cookley and Wolverley, I also believe the site could house more than the proposed 600 homes as seen in the plan. This location is also near good A roads and links to Birmingham through the A451, A456 and the A449 for those that are commuting to</p>

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				<p>Birmingham and other local West Midland locations.</p> <p>Blakedown- Travel and Railway Links</p> <p>Another consideration is our travel and Railway links, why is Blakedown not considered for development? You state that Kidderminster Railway station is the 2nd busiest in Worcestershire, it requires improvement especially for parking and the projection of greater passengers in the future but Blakedown is a station that could be developed and also on the line to Birmingham. You state in your report that Blakedown and Cookley have reasonable public transport but Blakedown we could make much better use of. If we are to develop the Lea Castle Hospital Site it would be vital to develop Blakedown too to accommodate the numbers which would use the rail network to access local commuter towns and cities. You must consider the local needs for Blakedown, and the boosting factor that this growing village has a railway station for the local residents as this would help to disperse the numbers and demand that is currently placed on the Kidderminster town station. Blakedown needs to be suitable developed, it should not be omitted or overlooked from your plans.</p>
Offmore Comberton Action Group - Local Plans	LPPO1566	Additional Site - Lea Castle	Comment	<p>The current draft WFDC Proposals in Options A and B propose using some of the land at Lea Castle. We propose extending this by including not only Options A and B but also extending the site to use the land up to the Wolverhampton Rd and, at the rear of the Lea Castle site, extending the site up to Axborough Lane as well as across to the Stourbridge Rd.</p> <p>We believe that an additional 37.73 Hectares can be brought into the Lea Castle site in this way. • We further believe that there MIGHT be a possibility of some development on the western side of Wolverley Rd towards Sion Hill to link with development at the Sion Hill Middle School site.</p> <p>With the additional land and including sites in that vicinity already identified by</p>

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				<p>WFDC, we believe a sustainable community of around 2,000-2,500 houses could be created. This would:</p> <ul style="list-style-type: none"> • be large enough to support a 2 form entry Primary School. • support a village shopping centre and potentially some employment land. • support a village centre which whilst within Cookley Parish would not produce a burden on that community. • be capable of sustaining a bus service. • potentially be able to provide live-work units. • be within the catchment of Wolverley CE High School and would positively impact on the school's long term viability. <p>We believe that our alternatives will create viable and sustainable communities, protect valuable, productive farmland, preserve endangered bird species and other wildlife and, by prioritising Brownfield development, ensure that our towns and town centres are viable and thriving.</p>
	LPPO1868	Extended Lea Castle	Comment	I think Option A Lea Castle "Sustainable Village" would be suitable for the building of houses. A two form entry primary school and a bus service.
	LPPO2089	Extended Lea Castle and Ferndale	Support	We support Lea Castle sustainable village with 2 form entry primary school and village centre sustainable bus service. Live-work units.
Spennells Against Further Expansion	LPPO1740	6.57 - site / strategysuggestion	Comment	<u>Phase 1 (first 5 years):</u> Use existing empty properties in the town centre e.g. Woolworths site for a leisure complex (cinema/bowling alley) and ideally the adjacent ex-Littlewoods building for a multi-storey car park. The remaining Lionfields site could then all be dedicated to housing/residential; plus other brownfield sites such as the Churchfields site (3000 houses could be constructed on these sites). If Worcester Street was not returned to through traffic, the Council would immediately save £500,000 of taxpayers moneyto purchase the vacant

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				<p>Woolworths building.</p> <p><u>Phase 2 (5-10 years)</u> : Use Lea Castle hospital site (brownfield site) for 600-700 houses.</p> <p><u>Phase 3 (after reviewing housing need, 10 – 15 years)</u>: Lea Castle Hospital and School site - use of Green Belt extension if absolutely necessary. Green Belt at Lea Castle only released at this stage if deemed necessary for increased housing.</p> <p>No Green Belt site to be released until housing needs are reviewed after 10 years.</p>
	LPPO3254	Lea Castle	Support	<p>A far more sensible proposal would be to build on the whole of the Lea Castle site as I appreciate houses need to be built somewhere in the area. Building on that site would not interfere with the local community or cause excessive traffic in an already built up area. Wolverley high school is not over subscribed so would have spaces for the new community. This would also support their long term viability.</p> <p>I would urge the council to think about these arguments rather than rushing into easy options that end up causing long term problems.</p>
	LPPO3854	6.57	Comment	<p>Looks to far ahead. Silverwoods needs finishing with appropriate infrastructure, recreational and green areas. Brownfield sites should be used for building rather than greenfield, such as Stanklyn Lane.</p>
	LPPO4681	6.57 Alternatives	Comment	<ul style="list-style-type: none"> would like to suggest that another review is done to check your housing figures needed. Then a further review needs to take place to check the <i>now</i> available brownfield sites to build on. New sites have come vacant since your plan, some of considerable size such as the land next to Matalan (ex-Wood Yard), possible further land at Victoria Carpets, and land at Kidderminster Harriers.

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				<ul style="list-style-type: none"> • There are also very many empty factories and buildings in and around Kidderminster town centre and ring road. The Magistrates Court being a prime example of this. All of these should be used first to build apartments for our younger or elderly population near the town centre and amenities (thus freeing up more ‘family’ sized homes negating the need to build more of these), and if these long standing empty buildings were not put forward in the Call for Sites, compulsory purchase orders should be used to acquire such. • The proposed ‘new cinema’ on Lionfields should be located elsewhere. If the Debenhams building becomes vacant or one of the large units over by Sainsbury’s, this should be utilised first. Lionfields is a prime location for residential development, thus being able to breathe life back into Worcester Street with an array of attractive cafes, restaurants, gyms and bespoke shops. The larger buildings (Woolworths e.g.) could be used for such cinema or a bowling alley itself. The amount of trendy ‘urban’ living apartments would encourage young people to stay in Kidderminster, and also give elderly people the chance to live somewhere safe and with facilities and release larger homes for families in existing suburbs. The money saved on not opening Worcester Street back up to traffic, could be used to regenerate this area as the night life / social eating area of Kidderminster. The current REEL cinema would become vacant if the new cinema is built, thus creating further opportunity to convert to apartments, or reduce the need for further industrial units at Easter Park. • Another option is to expand the development of Lea Castle and make it a village in its own right (develop from both options A and B). This should be developed in its entirety with local shops/facilities and a good road network, this supporting the Cookley and surrounding residents in getting to Birmingham and relieving the much maligned Horsefair and Ring Road.

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	LPPO4647	6.57 Alternatives	Comment	Kidderminster town centre has a lot of scope for development. You have Crown House, the swimming baths and the old Law Courts immediately spring to mind. It may even put some life into the town which at the moment is sadly lacking. I note there are brownfield sites that have not even been mentioned eg Brown Westhead. I would be very interested (along with a large number of people) to know the reasoning behind not developing these 'hidden' brownfield sites.
	LPPO3400	Alternatives	Comment	I would also prefer WFDC to look at revitalising the town centre by including as much housing as possible in new developments in the centre by combining it with retail and leisure i.e. shops/cafes on the ground level with flats/apartments above. A number of premises which have been empty for a considerable time would benefit the town by an imaginative conversion into housing including housing as part of the development of the Glades Leisure Centre site, and making provision for housing combined with new retail units along an improved road lay-out along that part of Blackwell Street leading to the Horsefair would be of great benefit to a gateway into the town. The old Victoria Carpets sports ground on Spennells Valley Road may be worth looking at also, as would the defunct golf course between Kidderminster and Stourport.
	LPPO4393	Paragraph 6.57	Comment	Empty units in the town could become apartments, industrial estates with empty units could be redeveloped. Plenty of areas where building would not upset so many lives like on Spennells.
	LPPO3666	Alternative sites	Support	<ol style="list-style-type: none"> 1. Blakedown to share some of the development. As you suggest this has a rail link and school. You have not included Blakedown in your plans. Why is this? It has a road link, good rail way and access and school. 2. Increases to housing near to the Safari Park, 3. Increases to housing towards the west of Kidderminster – in Franche and Woverley, distribute the housing rather than all on one site which will create an urban sprawl. 4. In old Sion Hill school

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				<ol style="list-style-type: none"> 5. At the back of Morrisons 6. The old Woolworth site and to the rear. 7. Place permanent housing on the large caravan sites in Stourport. 8. Use The town centre – build apartments in areas where the town is no longer vibrant. This will make the town more vibrant and safe.
	LPPO3654	Alternatives	Comment	<p>Clearly as WFDC have a target to meet of 300 new homes annually, until 2034. I appreciate that building new homes has to take place. To the east of Kidderminster we have the Lea Castle site which should surely be a primary development location. I would like to make the following observations in favour of the development of the Lea Castle Site.</p> <p>Options A and B WFDC current draft proposes using <u>some</u> of Lea Castle land for development. (Development plans for 600 homes were displayed at St Oswald’s Church Hall on 17th November 2016mber 2016) If the whole of the Lea Castle site were included in this proposed development then a new sustainable village, like Cookley, could be created. I also understand that with over 1000 dwellings a first school and shops become a viable option for a “Lea Castle Village”. Advantages of the Lea Castle site:</p> <ul style="list-style-type: none"> • With a sustainable community of say 1500 homes this could become a new Village with shops and a two form entry Primary School. • It could support a village centre which, despite being in the parish of Cookley, would be a separate village. • It would have existing road links to Kidderminster, Stourbridge, Wolverhampton and beyond. • It would be capable of sustaining a bus service • It would be within the catchment of Wolverley CE High School which

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				would have a positive impact on the school's long term viability
	LPPO3964	Paragraph 6.57	Object	<p>New Road is full of shops that could be relocated (perhaps some to the vacant shops within the town centre and vacant units on the Stourport Road) and housing built on both sides of the road. This would provide housing that is near the town centre, railway station and canal.</p> <p>I also think lots of care should be taken to provide quality, free, places to go. Sanders Park in Bromsgrove is much nicer than any park in Kidderminster and could be used as a model for Spennells Park.</p>
	LPPO3354	6.57	Comment	<ul style="list-style-type: none"> - Employment that could be within the South Kidderminster Enterprise Zone: 'Adjacent Ceramaspeed', 'Victoria Carpets Sports Ground' and land between Hoo Farm & Summerfield and opposite Easter Park. - Core Housing Sites that could replace Option A to the South of Kidderminster: 'Timber Yard Park Lane' and 'Bromsgrove St' (excluding the Glades site). - Create a large housing estate on the 'Lea Castle Hospital' site that has its own shops and services.
	LPPO3295	Alternatives	Comment	Land at Yew Tree Walk, Stourport is brownfield - this should be given precedence to greenfield land. The land is near to the town centre and immediately available.
	LPPO4456	Alternatives	Comment	Large buildings in Kidderminster town centre lay empty ready to develop.
	LPPO4526	Extended Lea Castle	Comment	I support the development of the vast Lea Castle site which has been idle far too long. This site is perfect for a sustainable community. Advantages it is large enough to support a 2 form entry Primary School - it is in the catchment area of Wolverley High School. It is capable of sustaining a bus service. This is a compact area and would easily become a community heart - not like the straggled Eastern

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				By Pass proposal. WFDC DO NOT MAKE A DISASTEROUS MAJOR PLANNING DECISION - LISTEN TO THE PEOPLE - LEA CASTLE IS THE OBVIOUS SITE TO DEVELOP WITH THE LEAST ENCROACHMENT ON GREEN BELT.
	LPPO4672	6.57 Alternatives	Comment	Justification 31.1 states “there is insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the necessary housing and employment growth required in the plan period.” I would counter that: <ul style="list-style-type: none"> • There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster.
	LPPO4541	Extended Lea Castle	Support	We feel that the proposed development at Lea Castle is the answer to your apparent need of more housing and could be further maximised without impacting on Green Belt land. There is sufficient land to encompass this and there is already infrastructure on site to accommodate a larger building project than proposed. This would seem more like a little village, better than a strip of land stretched into Green Belt at Offmore with a lack of community heart. The local schools are under subscribed, Wolverley CE High School being one, whereas Offmore Schools are over subscribed and can't be extended. Wouldn't a small primary school also on the Lea Castle site then become necessary for the extra houses and an answer to the locals needs anyway. A larger development at Lea Castle would also affect less householders directly than on the proposed East Offmore development.

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				The roads that surround the Lea Castle Site are already in place and further roads for the extra traffic wouldn't then be necessary, money saved. This money could be better spent then than on new bridges, new infrastructure and new roads to allow then possibly to help improve areas like Comberton and the Horsefair.
	LPPO4159	Alternatives	Comment	Build on brownfield sites in Kidderminster.
	LPPO4711	6.57 Alternatives	Comment	There are other options for housing the older inhabitants and younger people. Kidderminster has not made adequate efforts to make use of inner city land, especially in the more central areas, where most of the services are located. Canal side locations have been successfully developed in other towns and cities and the canal opposite Weavers Wharf would lend itself to the development of flats and apartments close to services. At the moment the huge timber yard and other semi-industrial uses will not attract shoppers to our retail district. Also the old shopping area, now declining could be rezoned for residential use. As our population is static, but the number of individual households is increasing, smaller developments close to facilities might be the answer. This is especially important for the more elderly residents who would not wish to be physically isolated in a vast housing development.
	LPPO4733	6.57 Alternatives	Comment	<p>6.57 What alternative option would I suggest? I would suggest a pragmatic approach to the requirement to build more dwellings.</p> <ul style="list-style-type: none"> • Start the Plan by completing the proposed housing on Silverwoods site (70 dwellings) and the other brownfield sites around the Wyre Forest (783 dwellings) in accordance with Policy 30 Table 30.0.1on page 173. Total 853 • There are dwellings already being constructed. From the figures supplied by WFDC these will number 441 during 2016. There may be more by the time we get to the end of 2017. • Most residents I have spoken to at the consultation meetings agree that

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				<p>the Lea Castle Hospital site would be a suitable area to put a large scale development. The core site would provide 600 dwellings. If this is then combined with the 2 sites from option A (150 dwellings) and option B (360). this would give a total of 1110. There used to be a school on the Lea Castle site (Alexander Patterson School). I don't know if the building is still there but, if so it could be refurbished and bought back into use. This would follow the view expressed in the Plan to minimise the number of sites in a more concentrated strategy.</p> <ul style="list-style-type: none"> • The Sion Hill School site is close enough to Lea Castle to consider using the land for a school rather than 60 dwellings. The shortfall could be taken up by encouraging larger existing houses to be converted to flats (Policy 18D) or old factories down Green street or elsewhere to be developed into flats. • This could take us at least 10/12 years into the future to get these dwellings built or at least agreed. At this time the plan could be reviewed in the light of the changed requirements at this time which may or may not require the need to develop on greenfield sites. I know people who have houses on the Spennells estate. They have been advised when purchasing the property that there are in place plans to build on land on the edge of this estate. Presumably, this land already designated could be used for more dwelling if required.
	LPPO4770	6.57 Alternative Sites	Comment	<p>The following are either brownfield, empty or vacant properties that should be developed before any Green Belt land is used thus creating a mixture of low cost starter houses, inner city living apartments and canal side properties which would bring people and life back into the centre of Kidderminster, will support shops, coffee shops, restaurants, pubs and in turn create a vibrant town centre without building on Green Belt.</p>

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				<ul style="list-style-type: none"> • Lea Castle – Potential for 1000 houses which would also then be eligible for a new school. If the planned number of house on this site increases then a new school could be accommodated here to avoid further congestion, it is well screened from major roads which would also add to the look of the area. • Sion Hill (School) now derelict and in need of demolition • Timber yard (opposite Weaver’s Wharf) • Empty buildings (by Matalan) • Wyre Forest Golf Club site (owned by the council) now unused. • Crown House – develop into flats for inner city living or demolish • The old Magistrates Building could provide refurbished apartments <p>I understand there are currently over 1000 empty residential properties around Wyre Forest, these need to be utilised before any building work on new homes begins.</p> <p>Outlying areas such as Stourport, Bewdley, Wolverley, Chaddesley Corbett, Blakedown, Mustow Green etc appeared to have been left out or hugely overlooked in this review.</p> <p>In addition any land lords with empty properties should be made to put these back into the housing stock either for rent or for sale. We cannot have properties sitting empty whilst we use up Green Belt land. The Council should also lobby Parliament to change any laws to ensure landowners do not keep empty properties which are detrimental to the local area e.g. Crown House and Worcester Street.</p> <p>Further to this we may have land in the area which is owned by developers who are not building due I expect due to the lack of profit available. Any planning permission already granted to such developers need to develop these sites without delay, any future planning permission given should have a time period</p>

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				that states any building work is started & completed within that time scale.
	LPPO4747	6.57 Alternative Sites	Comment	Lea Castle could accommodate 1000 houses as the infrastructure is already in place, by increasing the planned number of houses on this site a school could be accommodated here to avoid further congestion.
	LPPO4543	6.57	Comment	I would request also that other brownfield sites within the parish of Cookley and Wolverley are also considered i.e. Brown Westhead Park in Wolverley which was a former army hospital in WW2.
	LPPO3426	Brownfield Sites	Comment	I urge the Council to re-consider brownfield sites such as space left by Glades and Lea Castle. Developing our pitiful town centre would help to regenerate this area. The town definitely does not need any more supermarkets.
	LPPO3853	6.57	Comment	<p>Develop all the small plots of land that has already had buildings on previously.</p> <p>The old Sladen school site, Sion Hill Middle school site the Glades on Bromsgrove Street site instead of taking what seems to be the easy option of churning up large swathes of virgin Green Belt land.</p> <p>A village at Lea Castle has been suggested which would be large enough to support economic advantages to schools/education and infrastructure in the immediate community.</p>
	LPPO4608	6.57 Alternatives	Comment	<p>There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site.</p> <p>There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster.</p> <p>I also strongly suggest that you consider other brownfield sites such as those I have outlined in Wolverley to share the housing quota which is due to Wolverley</p>

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				and Cookley Parish.
	LPPO4613	Extended Lea Castle	Support	I understand the need for more houses in Britain, but I fully believe that these houses have to be built with sustainability in mind. If you are looking to encourage people to move to Kidderminster and invest in the local area, you need to provide these residents with services, such as schools and public transport. This would all be possible with extending the planned building on the Lea Castle site. Developing a sustainable village would allow for a school to be built, a bus service and a village centre. This would be much more desirable. To me, it is clear that building a village on Lea Castle is the only option that is viable and sustainable.
	LPPO4614	Extended Lea Castle	Support	The Lea Castle ‘Sustainable Village’ plan as put forward by ‘Offmore Comberton Action Group-Local Plans’ should be taken up. This proposal is futuristic, a new community which many people would love to live in, not dollops of development strung out across the Green Belt.
	LPPO4663	6.57 Alternatives	Comment	<p>I strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.</p> <p>On page 178 Justification 31.1 it states “there is insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the necessary housing and employment growth required in the plan period.” I would counter that:</p> <ul style="list-style-type: none"> • There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still

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				not built on behind The Range at Crossley Park in Kidderminster.
	LPPO4524	6.57	Comment	<p>There are many empty and unused sites: The old Magistrates Courts and other empty units in Worcester Street; Park Lane factory buildings - empty and decaying; Mill Street seems to have numerous unused and empty sites; Crown House; Easter Park still has empty units - perhaps a change of land use should be considered here since, after seven years we still do not need so many retail units there.</p> <p>There is still a long way to go with the new development at the former British Sugar site - why can't we hold off on any drastic commitment until we see a clear need?</p>
	LPPO4531	6.57	Comment	Are you sure there are no more brownfield sites that could be utilized. Let's start by pulling down Crown House and replacing it with a residential property. Are there no buildings in New Road and Green Street that are not being used but could be converted into homes.
	LPPO4016	Paragraph 6.57	Object	<p>I note that the current local plans propose using some land at Lea Castle to help meet housing allocation targets. Consideration should be given to not only including Options A & B but also extending the site to sue land up to Wolverhampton Road and extending the site up to Axborough Lane. The additional land at these sites could create a sustainable community of 2,000-2,500 houses and:</p> <ul style="list-style-type: none"> • be large enough to support a 2 form entry primary school • also support a village centre, but not put a burden on that community • capable of sustaining a bus service • offer scope for live-work units • and be in the catchment of Wolverley High School- positively impacting on

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				<p>its long term viability</p> <p>I'm concerned that no consideration has been given to looking at meeting some of housing allocation targets by developing out on land to the North/West of Kidderminster. For example some new stock could be reasonably developed near the Ferndale estate.</p>
	LPPO4028	Alternatives	Support	<p>A possible alternative is to start using brown sites to build on such as Sion Hill middle school and derelict buildings inside the town such as the old Woolworths and many more buildings down Worcester Street. Other weaknesses of Kidderminster that could be worked on includes the stretched GP services, few major high value employers and Kidderminster town centre, none of which will be achieved through increasing the population.</p> <p>The plan in option A mention building 600 hundred houses, on the old Lea Castle site, would it more viable to build more houses in this area as well as a school and shops, not only would this be a beautiful place to live you will be generating more jobs.</p> <p>The plan also hasn't considered other surrounding areas such as Blakedown which would be much more viable for access to Birmingham.</p>
	LPPO4881	6.57 Alternatives	Support	<p>Transferring the Option A Lea Castle extension land, to Option B</p> <p>Your plan also makes no reference to the possibility of using the extensive land surrounding Blakedown. This would be an important consideration, as here, there is scope to extend car parking at Blakedown train station.</p>
	LPPO4874	6.57 Extended Lea Castle	Support	<p>Providing the stops are in place on Hurcott Lane and Hurcott Road full development of the Lea Castle site, which I understand could provide up to 2000 dwellings, seems the most logical step to develop the eastern side of</p>

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				Kidderminster, if that is deemed necessary, despite there being availability of land in other areas. If Lea Castle were developed to its full potential there would be cost savings on infrastructure and in particular utilities. It would also offer the ability to offer a mix of affordable housing far in excess of that which would be provided on the Hurcott sites. Additionally it would be self sufficient in terms of local amenities, schooling and medical facilities, which would then not be a drain on overstretched Cookley.
	LPPO4457	6.57	Comment	We urge the government to build on the brownfield sites within Kidderminster which will regenerate the town centre.
	LPPO4226	Alternatives	Comment	Redevelop the old post office and derelict factory buildings in Kidderminster.
	LPPO4300	Alternatives	Comment	I would also like to suggest the use of the Kidderminster golf course as part of the re-development plans. The golf course could be re-located in some of the proposed building area and hence maintain the precious Green Belt.
	LPPO3805	Paragraph 6.57	Support	I suggest that the tower above the old post office at the Bull Ring Kidderminster is converted into affordable apartments clad in non-combustible material to improve aesthetics.
	LPPO3143	Alternatives	Comment	Under Planning Policy Statement 3 for housing priority for development should be previously developed land, in particular vacant and derelict sites and buildings. This area of land has only a small footprint of buildings. Other areas with more previous development in particular vacant and derelict sites and buildings would be more suitable. Without development previously used land has a detrimental affect on area.
	LPPO4511	6.57 - Extended Lea Castle	Support	As an alternative, I'm throwing my weight behind the Lea Castle "Sustainable Village" plan outlined by the OCAG-LP. The current draft WFDC Proposals in Options A and B propose using some of the land at Lea Castle. I propose extending

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				<p>this by including not only Options A and B, but also extending the site to use the land up to the Wolverhampton road and at the rear of the Lea Castle site, extending the site up to Axborough Lane. I also believe that there might be a possibility of some development on the western side of Wolverly Rd towards Sion Hill to link with development at the Sion Hill Middle School site.</p> <p>This plan would be large enough to support a new 2 form entry Primary school, a new village centre, a sustainable bus service and would also be in the catchment area of Wolverley High School. And that's only scratching the surface.</p> <p>Please at least seriously consider this alternative plan.</p>
	LPPO4548	Extended Lea Castle	Support	<p>It would be far preferable to create a sustainable village at the Lea Castle site. Extend the site up to Wolverhampton Road and to Axborough Lane. Include the required primary school and a village centre to minimise impact on Cookley. It would be in the Wolverley High School catchment.</p>
	LPPO3643	Paragraph 6.57	Comment	<p>I would like to suggest:</p> <ul style="list-style-type: none"> • Lea Castle blue print only. • Westhead park Wolverley • Site of the old Quarry. <p>Plus we have a town centre sitting empty, why not turn he empty shops, disused offices into dwellings, thus surrounding the new eateries, making Kidderminster a more attractive enticing place to live and socialise.</p> <p>I also believe that our area needs to be more innovative in our buildings and become a known area for a sustainable district of innovative non traditional building method. We started off right with the council building why not for all</p>

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				<p>future homes and business development more fitting to our landscape, after all Wyre Forest is known for its Oak trees and we have vast farming for straw/hay for strawbale.</p> <p>This alone would bring in visitors to our area and make people want to migrate.</p> <p>I hope we can all work together closely to make the Wyre Forest an area we can all be proud of for future generations.</p>
	LPPO3334	Alternatives	Comment	<p>There are brownfield and infill sites available that have not been considered/identified, these need to be used before any development on greenfield sites.</p>
	LPPO3120	Alternative Sites	Comment	<p>Bromsgrove St. (BHS/2): I do not feel that Kidderminster needs another cinema with a multi-storey or more shops. This would release more land for housing. Perhaps some of the empty shops in the town could be converted into housing thus bringing life back into Worcester Street.</p> <p>Sion Hill School (WFR/WC/18): Develop the playing fields and extend this development down to the Wolverhampton Road.</p> <p>Lea Castle (WFR/WC/15): Extend the Lea Castle site to use the land up to the Wolverhampton Road and at the rear of the Lea Castle and extending the site up to Axborough Lane. This is my preferred option as it would create a sustainable community with its own Primary School, health facilities, shops etc. This larger community would alleviate any issues that a smaller site would have on Cookley Parish.</p> <p>There are no proposals for any development on the north/west of Kidderminster e.g. The rear of Ferndale Estate could be developed.</p>

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	LPPO3327	6.57 Alternative Sites	Support	<p>An alternative would be to develop brownfield sites and Kidderminster Golf club, potentially widening Deansford Lane.</p> <p>Using the Lea Castle Centre would offer a centred separate community for new housing.</p>
	LPPO3107	Alternatives	Comment	<p>Alternative proposals to be considered:</p> <p>Increase Lea Castle land up to the Wolverhampton Rd, Axborough Lane and the Stourbridge Rd. Also on the western side of Wolverley Rd linking to the Sion Hill Middle School site. to create a sustainable community with new primary school and shops and the capacity to sustain a bus service. As a feeder school to Wovlerley CE High School it will also have a positive impact on the high schools long term future.</p> <p>Proposal of industrial development at Hodge Hill other empty units at industrial sites not being filled so need no further development.</p> <p>I hope these alternative proposals can be taken into consideration</p>
	LPPO4041	Paragraph 6.57	Comment	<p><u>My proposals</u></p> <p>I believe the number of properties required in the Wyre Forest from 2019 to 2034 has been vastly over-estimated by both the Objective Assessment of Housing Need (OAHN) by AMION and the Local Plan Review (the Wyre Forest housing requirements has only grown by 1000 in the last 15 years) and I believe the housing requirements should be met in order as follows:</p> <ul style="list-style-type: none"> • identify and bring back into use all vacant housing properties in Wyre Forest

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				<ul style="list-style-type: none"> • identify and develop housing on all vacant brownfield sites • use the land banked areas • review the Kidderminster Town centre plan to revitalise the centre of the town as follows: <ul style="list-style-type: none"> ○ consider converting to living accommodation many of the empty smaller shops ○ scrap the plans to build a cinema on the old leisure centre and build properties (flats and small houses on this area) ○ convert the old Woolworths and if necessary the Littlewoods store into a cinema and bowling alley ○ demolish the old Crown House building and redevelop this area as originally planned ○ build an enclosed two-way escalator access from Worcester Street to the Bromsgrove Streetcar park to bring people into town ○ consider making the Bromsgrove Streetcar park multi- storey with apartments on top. If not build on the "smaller areas" nearer Prospect Hill ○ convert the old law courts to apartments ○ is the old health centre now fully utilised now the new one has been built? If not part-demolish and build housing ○ develop the area that was fire damaged on the corner of New Road and Bridge Street • consider small scale developments in Wolverley • consider developments in Blakedown as the station is being upgraded and a bigger car park is being built Although they now have a neighbourhood Plan this was not in existence when this consultation started and should be ignored • develop Lea Castle for housing as per the Local Plan <p>If it is found after developing all brownfield sites that further housing is still</p>

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				<p>required THEN and ONLY THEN extend Lea Castle to Axborough Lane to the east towards Stoubridge Road and the west towards the Wolverhampton Road and get the developers to contribute to new roundabouts on both roads. The roundabout on the Stourbridge Road will hopefully help to cut down the number of serious and fatal accidents on this stretch of road. This developed area in and around Lea Castle could then become a new village with it's own school, shops and health centre.</p> <p>This village could also be extended south of Park Gate Road if there was the need.</p> <p>If you still a requirement after this has all been completed the take up the remaining parts of option B as this is much more dispersed and requires less Green Belt than option A</p> <p>I believe there are enough suggestions in "My Proposals" above that would enable significant housing demands to be met in a priority which will not only be fair and satisfy most of the Wyre Forest population but will also bring life back into the town which Kidderminster desperately needs.</p>
	LPPO3746	Selba Drive	Object	<p>The land was handed to the Council on the understanding that it would be left as open access land and green space for people to enjoy, not to be built on.</p> <p>It is well used by a great amount of people both young and old for many purposes and should remain as such.</p>
	LPPO4129	6.57 extend Lea Castle	Comment	<p>As a first point we are surprised that the development of the largest brownfield site in the area, (the former Lea Castle complex) is subject to such a restricted plan whereas the major part of the plan is centred on Green Belt land. The complete development of this site would simply be a return it to being fully developed, albeit for a different purpose. The full development of this would directly</p>

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				<p>inconvenience by far the lowest number of existing house holders and due to the fact that most of the site is hidden from people travelling through the Wyre Forest area so the impact on the general attractiveness of the east of the town would not be impacted to such a great degree. We accept that the development of the land bordering the Stourbridge Road, between the Park Gate and Axborough, would be visible to travellers, but less than a dozen existing residents would be directly affected.</p> <p>The nature of the former use of this site means that the subterranean infrastructure is far greater than the footprint of the former buildings. This infrastructure and existing utilities on site, would also make development cheaper, quicker and inflict less disturbance on residents surrounding the site.</p> <p>There would also be the advantage of the development of a village atmosphere that would not be true of the ribbon development proposed. This site also provides existing access to major roads into and out of the ‘village’ that would not impact the locality so badly. It also completely eliminates the danger of providing a ‘cut through’ and provides a selfcontained safe village type community</p> <p>We are also surprised by the lack of utilisation of the Sion Hill school site. The explanation that it is to be retained for St Oswald’s school does not bear scrutiny. The former school playing field was far too large for the former secondary modern school. The adjoining fields leading down to the A449 would also increase the available building land by an extensive extent, again with little or no impact on the tiny number of local residents. This would also add to the village feel to the development, benefit existing schools and provide a local infrastructure of shops and community buildings. We submit that this would far better serve all concerned than the poorly thought out ribbon development of Offmore, that will blight the area for a far larger number of existing residents and at a greater cost, both financial and aesthetic to locals and visitors alike.</p>

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	LPPO4590	6.57	Comment	Why is the expanded Lea Castle site included within Option B not included in Option A and why is Blakedown excluded completely.
	LPPO4504	6.57 Alternatives	Comment	<p>Before any Green Belt is built on all Brownfield sites should be used first including Sladen and Sion Hill School sites. There are also many empty shops in Kidderminster which should be considered perhaps to provide apartments at reasonable prices. It would enhance the area which is very run down and does nothing to encourage visitors to return. There are also empty factory sites within the town which could be utilised in the same way.</p> <p>What about the area to the North of Kidderminster between Habberley, Franche Fairfield and Wolverley where there is a lot of open unused land surely this should be a consideration.</p> <p>I believe that a better option would be to create a new village on the Lea Castle site. The current proposal is for 600 homes, if this was extended to use land at the rear of the site and also include land up to the Wolverhampton Road and up to Axborough Lane it would become a fully sustainable community of 2000 homes or more. It could support its own Primary School, Bus Service and shops etc. It is a perfect site which is surrounded by Woodland and trees and therefore would not have a negative visual impact.</p>
	LPPO4603	6.57 Alternatives	Comment	<p>There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster.</p> <p>I also strongly suggest that you consider other brownfield sites such those I have</p>

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				outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.
	LPPO4635	6.57 Alternatives	Comment	There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the Council and with limited economic benefit to the area. Similarly the site of the old quarry on the opposite side of the B4189 to the above site seems to have also been overlooked. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster. I strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the new build quota.
	LPPO4642	6.57 Blakedown	Comment	I believe the Local Plan should include Blakedown given the recent new residential development there and as parking at Kidderminster station cannot easily be increased but could be at Blakedown.
	LPPO4527	Ferndale	Comment	WFDC are wrong not to propose ANY development on the North/West of Kidderminster where 100-200 houses could be developed at the rear of the existing Ferndale Estate.
	LPPO4441	Alternatives	Comment	<p>Kidderminster no longer has a thriving carpet factory industry and indeed there have been a number of well publicised redundancies at the remaining carpet factories in recent months. Another major employer in the area, Sealine, has also closed down in the last couple of years. We do not have the industry, manufacturing or otherwise, to support a growth in the population and there is little to attract young, ambitious people to work in the area outside of retail and tourism jobs. Highly skilled workers and those with advanced qualifications such as degrees, frequently have to go elsewhere to find jobs suited to their requirements as they cannot find them in Wyre Forest.</p> <p>The town centre has a considerable number of empty retail units, some of which</p>

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				<p>have unfortunately been vacant for a number of years. Worcester Street presents a depressing sight with lots of empty shops and “to let” signs.</p> <p>As an alternative, I would prefer that the Council focusses on using existing brownfield sites for housing and development instead of unnecessarily destroying designated Green Belt. I feel that there are a number of opportunities to rid Kidderminster of unsightly and often derelict properties, some of which have been in this condition and blighting the town for years rather than months. For example, the area near Matalan on Park Street has several old, unsafe buildings and also the old timber yard next to Matalan. The old law courts building has also been empty for a long time and I am sure that there are a number of other possibilities. I would also urge the Council to use the land at the former Lea Castle Hospital for housing development instead of Spennells Fields and The Captain’s Pool and The Lodge areas.</p> <p>In summary, I do not think that the numbers projected by the Council are realistic, based on the lack of population growth over the last 10 years and the lack of industry and jobs to attract new people to the area. If these numbers are in dispute, there is no need to build 6000 new homes on Green Belt land. I accept that some new homes will be required, but think that existing brownfield sites and the former Lea Castle Hospital site should be used instead of destroying our beautiful countryside.</p>
	LPPO4686	6.57 Alternatives	Comment	<p><u>On page 178 Justification 31.1</u> it states “there is insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the necessary housing, and employment growth required in the plan period.” This is not so I would counter that for two reasons:</p> <p>There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings located all</p>

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				<p>over it, partially owned by the council. These appear to have very limited economic benefit to the area.</p> <p>There is also the site of the old redundant quarry on the opposite side of the B4189 to the above site. There is also brownfield land still not built on behind The Range at Crossley Park in Kidderminster.</p> <p>There was also an application to build housing on the Churchfields site Kidderminster that remains un-developed, since the application was not allowed in 2015.</p> <p>Why is it these sites are not under consideration? Just because the government of the day allows you to build on greenfield sites, it does not mean you have to, especially when the above sites could be considered.</p> <p>I believe you have a duty to fully explore these options and give clear and transparent reasons to the public why you may not take them into account. I strongly suggest that you consider brownfield sites such those I have outlined.</p>
	LPPO4692	6.57 Alternatives	Comment	<p>Suggestions:</p> <ul style="list-style-type: none"> • Development of Lea Castle for sustainability. Widening of Deansford Lane - offers a sensible non destructive alternative. <p>There are plenty of other development sites that will not impact local residents.</p>
	LPPO3646	Selba Drive	Object	<p>This area is used by many local residents for social activities (children playing or dog walking) removal of this would cause local people to have to go further away from their homes to continue these activities</p>

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				<p>9 homes would approximately mean another 18 vehicles (2 per household seems quite normal), which would need to be catered for in Selba Drive.</p> <p>In addition, the current excessive parking at the junction of Selba Drive & Westminster Road has already caused many people to complain to the council. This is before the introduction of more vehicle traffic.</p> <p>With the new houses also built in the site of the Cooper's Arms (again with inadequate parking), it will increase on road parking at the other end of Westminster Road.</p> <p>There are plans to remove the old garages and put 4 more houses in the same site. Many cars go up there as it is, where are those meant to park once the work starts / completes?</p> <p>There is not enough space for the current number of vehicles. Adding potentially 18 more vehicles to park and use these roads will cause more problems.</p> <p>I can see a future of parking problems that will be a constant source of complaints.</p> <p>In a nut shell, this area cannot accommodate the traffic that will arise from this development.</p>
	LPPO4429	Alternatives	Comment	The council should prioritise the development of brownfield land such as the rest of the Silverwoods estate, the old Sladen School site and Sion Hill School, to meet the shortfall in housing which is provided as the reason for the proposal.
	LPPO4702	6.57 Alternatives	Comment	Justification 31.1 it states “there is insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the necessary housing and

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				<p>employment growth required in the plan period.” I would counter that:</p> <ul style="list-style-type: none"> • There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the Council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster. <p>I also strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.</p>
	LPPO4707	6.57 Alternatives	Comment	<p>Justification 31.1 it states “there is insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the necessary housing and employment growth required in the plan period.” I would counter that:</p> <p>There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster.</p> <p>I also strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.</p>
	LPPO4157	Lea Castle	Support	<p>The Lea Castle site could be adopted as suitable for an initial large scale development, incorporating appropriate infrastructure such as schools, shops, GP</p>

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				surgery, transport links, etc.
	LPPO3160	Alternatives	Comment	We would like more consideration of developing brownfield sites, including the town centre.
	LPPO3166	Alternatives	Comment	We would like more consideration of developing brownfield sites, including the town centre.
	LPPO3168	Alternatives	Comment	<p>Land is a precious resource, we need affordable housing to be built, but there are alternative Brownfield sites in Kidderminster and the surrounding areas. These could and should be used first.</p> <p>Kidderminster town centre has opportunities for housing development. Use the existing infrastructure and consider building residential units or change of use.</p>
	LPPO3212	Alternatives	Comment	<p>Extend the area to build on at Lea Castle include all the land from the A449 to A451 and to Axborough Lane.</p> <p>Consider land at the rear of Ferndale estate.</p> <p>Brownfield sites should be built on before destroying the Green Belt. Sladen school and Sion Hill school sites have still not built on. Do we need so many houses?</p>
	LPPO3608	Extended Lea Castle and Ferndale	Comment	<p>I would like to propose the use of land at Lea Castle, this could be extended to use land up to the Wolverhampton Road and at the rear of the Lea Castle site, extending up to Axborough Lane. There could also be some development on the Western side of Wolverley Road towards Sion Hill which would link with the development at the Sion Hill Middle School site.</p> <p>This development could create a sustainable village with all the required infrastructure to support it. It would support a village centre and would be large enough to support a primary school. The village would be able to sustain a bus</p>

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				<p>service and would not impact on the community of Cookley.</p> <p>In addition to this I feel that, WFDC should propose some degree of development on the north/West of Kidderminster and feel it would be reasonable to develop land at the read of the existing Ferndale estate which could accommodate 100-200 houses.</p>
	LPPO4891	6.57 Alternatives	Comment	<ul style="list-style-type: none"> There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster. <p>I also strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.</p>
	LPPO4893	6.57 Alternatives	Comment	<p>Green Belt land should not be removed when suitable alternative sites could – and should - be used e.g. further development of the Sugar Beet site, the Lea Castle campus and city centre developments.</p>
	LPPO3828	6.57	Comment	<p>I would like to propose the following:</p> <p>That consideration is given to developing firstly all the existing brownfield areas within Kidderminster. The most significant being the former Sladen and Sion Hill school sites.</p> <p>The former Lea Castle hospital site near Cookley, which is already earmarked for a development of 600 dwellings. This will put pressure on the existing facilities in Cookley namely the primary school and doctor’s surgery. If this were to be</p>

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				increased to around 2,000 dwellings then the development would be eligible for its own school, bus service route and doctor's surgery, taking the pressure off the village of Cookley. As this area is on the other side of the A449 and already well screened by woodland it would not have a significant visual impact on the village.
	LPPO3555	Alternatives	Comment	Brownbelt land must be utilised, empty Kidderminster shops to incorporate apartments above, utilise the top of Park Lane, behind Matalan in Kidderminster, properties in Green Street opposite Aldi.
	LPPO3860	6.57 Lea Castle and Ferndale	Object	<ul style="list-style-type: none"> • Other options are more suitable. • why not development at the rear of existing Ferndale Estate.
	LPPO3763	Alternatives	Comment	<p>There is flatter land potentially available where the recently closed golf course is. It is a much larger plot of land so could accommodate quite a significant estate rather than the 80 properties being considered at present. It would also seem to be suitable on other levels such as traffic access as it is in closer proximity to the Stourport/Kidderminster dual carriageway.</p> <p>The only down side I can see compared to the existing proposal is that the council do not currently own the golf course land.</p>
	LPPO4907	6.57 Alternatives	Comment	<p>It states "there is insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the necessary housing and employment growth required in the plan period." I would counter that:</p> <p>There are brownfield sites that are not even on the plan, for example Brown West head Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in</p>

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				<p>Kidderminster.</p> <p>I also strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.</p>
	LPPO4915	6.57 Alternatives	Comment	<p>The plan has not considered Blakedown. Section 13.21 and 13.22 recognises that parking at Kidderminster Railway station cannot be expanded easily but there is scope at Blakedown. I believe the Local Plan should be revisited to include Blakedown particularly given the recent new residential development in that area.</p> <p>The Local plan is biased. It should also cover Blakedown. It is not in accordance with the guidelines for Public Consultation and falls short of both YouGov and Rural and Town Planning Institute best practice and needs to be revisited.</p> <p>Kidderminster town centre as it is now is devastated. With the retail sector hit so hard by internet sales it seems unlikely that we can revitalise the old high street to sustainable levels. So why is nobody talking about converting the old Woolworths/Littlewoods buildings into nice new apartment blocks with plenty of accessible parking at the rear and only a short walk to both the station and weavers wharf and how this might help to stimulate the local economy in more effective ways?</p>
	LPPO4533	Extended Lea Castle	Support	<p>I believe a larger development at the Lea Castle site should be built to create a sustainable community with a new Primary School and a village centre. This would incorporate options A and B at lea Castle and extend the site to the Wolverhampton Road, to the rear of the Lea castle site and to the Axborough Lane.</p>
	LPPO4454	Alternatives	Comment	<p>Are there really no brownfield sites left to develop?</p>

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				<p>I would like to see a more dynamic approach to bringing the centre back to life with apartments. Perhaps reduce the number of shops to provide land. Many shopping streets are now a relic of pre-retail park days. There are also tracts of old carpet factories used for small businesses. Not a good use of city centre land.</p> <p>I can't see any mention of eco-housing. Surely all proposed housing should far exceed minimum insulation standards and incorporate solar panels as standard.</p>
	LPPO4460	Alternatives	Comment	Use brownfield sites plus significant use of the Lea Castle area which will have minimal impact on the present residential population.
	LPPO4751	6.57 Alternative Sites	Comment	<p><u>Objective: To plan for Long Term Sustainable Development</u></p> <p>There's a clear need for a robust and approved local plan to be in force and for adequate land to be set aside for realistic, planned future development. However before any consideration, at all, is given to the re-designation of Green Belt land, there are other alternatives which should have prior consideration:-</p> <p>Brownfield sites – These include:- Victoria carpets' former sports ground; Kidderminster Golf Club and Car Park; Land North of Bernie Crossland Walk (Rear of Chester Road South); Land South of Bernie Crossland Walk; Chester Road South Service Station; Land at 78 Cherry Orchard; Comberton Place; Lea Street School; Stadium Close (also Aggborough Stadium); The former Polish Club;</p> <p>Other sites, including those in Stourport and Bewdley should be identified. These include, but not exclusively: Former school sites (including playing fields) at Sladen, Sion Hill, Stourminster and Blakebrook Schools, in Kidderminster and, maybe others in Stourport and Bewdley; the former Sugar Beet Factory site – A higher density of housing is probably feasible; the Lea Castle site – suitable for high density, affordable housing; the former Wyre Forest Glades site – should be re-designated for high density affordable housing; Redundant shops/offices in town</p>

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				<p>centres and elsewhere are suitable for conversion, or demolition and redevelopment:</p> <p>Kidderminster has numerous longstanding vacant premises, which are likely to attract only low rental occupation. Competition from Merry Hill, Worcester and, ever increasingly the internet, has had and will continue to have, adverse effects on the retail trade. The future retail needs of the town can be met by the Weavers Wharf development and Vicar Street. The remainder of the town (including the former 'Woolworths' and 'Littlewoods' sites and other empty shops in Worcester Street) is, therefore, potential for redevelopment. A massive area, extending to the former 'Glades' Centre and the Ring Road, is ideally suited for high density, affordable housing, which in present circumstances, appears to be much more important than more shops/cinema etc.</p> <ul style="list-style-type: none"> • Stourport has vacant shops and office space which could be considered for domestic use. • Bewdley also appears to have unoccupied properties and, in particular the HSBC has recently moved out of its premises. Town centre domestic units can be very attractive, particularly to young people. • Crown House – One of the worst eyesores in the UK. This would be best suited for urban open space but the site could be considered for domestic redevelopment. • Swan Centre – One of the least frequented shopping centres in the region. This could be demolished and re-developed. <p>N.B. Compulsory purchases of town centre properties should be considered, where owners of designated units are reluctant to sell.</p> <ul style="list-style-type: none"> • Park Lane Kidderminster – vacant sites include long disused mill units opposite the Matalan site, the former 'Jewson' site and other possible

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				<p>development land nearby. These may have been earmarked for an extension to Weavers Wharf but, in present circumstances, housing appears to be the priority.</p> <ul style="list-style-type: none"> • Aggborough Stadium. -The prospect of Kidderminster Harriers removing to the training ground site in Stourport Road has recently come to light. This would leave the stadium and car park site available for substantial, high density housing, in keeping with existing development of the surrounding area. This, it would appear, has not been taken into consideration in the Council’s planning. • The large site adjacent to ‘Tesco’ in Stourport – this is already fenced off and designated for development, but has remained undeveloped for several years. • The former sewerage treatment site in Wilden Lane, Hoobrook (backing on to McDonalds). • The development of open areas presently used for car parking. This would require the provision of multi-level car parking in the 3 towns. • Existing domestic properties within the 3 towns and available for purchase and redevelopment - possibly small sites suitable for one or two houses, properties available for demolition and use of large gardens. • The Countryside - Sensitive developments, especially where existing main roads provide essential access, e.g. Shenstone (A450), Mustow Green/Harvington/Stone (A448/A450), Low Habberley (B4190) and land at the junction of the A449 Wolverhampton Road/B4189 Wolverley Road and Park Gate Road etc. etc. • Local villages/residential areas – small housing developments in keeping with existing structures and avoiding essential Green Belt where possible. e.g. Chaddesley Corbett, Cookley, Wolverley etc. etc. <p>N.B. “The modern trend of developing small ‘pocket’ communities has much to</p>

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				<p>commend it, when compared to the impersonal facelessness of large estates”.</p> <ul style="list-style-type: none"> • Reviews - Sites where previous applications for planning permission have been refused should be reconsidered – these are likely to be numerous. Priorities for the future are changed and decisions now outdated. <p>N.B. It is unfair that the south-east of Kidderminster has borne the brunt of expansion over the last 4 decades and is again in the forefront for planned new development.</p> <p>There are other Green Belt and other areas in Wyre Forest, around Kidderminster, Stourport, Wribbenhall, Bewdley and the local villages (not considered in either Option A or Option B), with potential access from existing main roads.</p>
	LPPO4505	6.57 - Extended Lea Castle	Support	Support Lea Castle
	LPPO4172	Alternatives	Comment	Has site of Glades Leisure centre been considered for apartments? Can old part of the Kidderminster Town Centre be turned into apartments?
	LPPO4509	6.57 Alternatives	Comment	<p>Primary areas for development need to be areas already used, brownfield sites. The development of Lea Castle site is a much needed area of development. The site itself already contains the basic needed for a housing complex and the road network is such that it can take the weight of traffic.</p> <p>Development that allows for the building of the eastern relief road enables people to be connected to major road networks, allowing them to commute without getting gridlocked in town traffic.</p>
	LPPO4638	6.57 Alternatives	Comment	Use brownfield land for affordable housing
	LPPO3793	6.57	Comment	I am emailing to oppose the planning for building to take place on Green Belt land to the east of Kidderminster. I cannot see why these proposals would be made

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				<p>when there is perfectly good land to be built on at Lea Castle, especially as this site could be used as a sustainable village. There is also land to be used on the existing Ferndale estate that seems perfectly reasonable to me for at least 200 houses.</p> <p>To build on the proposed Green Belt land would be an intrusion on the beautiful wildlife that inhabit there and a visual intrusion to the stunning land also. There are many endangered bird species that would be affected and I personally think it would be a crime to damage that.</p> <p>I truly hope you take Lea Castle and the Ferndale estate into consideration before destroying our lovely countryside.</p>
	LPP04652	Extended Lea Castle	Support	<p>I would suggest that an <u>Option C</u> should be considered, that utilises more than the designated area around Lea Castle, and builds sufficient houses there to justify a school, and a shopping and community centre. Residents could then do local shopping on site and not need to travel so often to the town centre.</p> <p>I am not commenting out of self-interest, I am thinking of future generations who could have their own school in an enlarged Lea Castle complex.</p>
	LPP04679	6.57 Alternatives	Comment	<ul style="list-style-type: none"> Use existing empty properties in the town centre (eg. Woolworths site), for the proposed leisure complex (cinema/bowling alley) or move it more towards the Weavers Wharf area to stop the town centre becoming divided and further disjointed. The Lionfields site could then all be dedicated to housing/residential. Other empty buildings here could then be made into restaurants/cafes and the road not opened up to traffic to allow a 'café culture' with outside seating etc. <p>The monies saved (£500,000) from opening up the road (keep it pedestrianised to promote said café culture) could be used to compulsory purchase these buildings</p>

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				<p>and revamp this area of town. It is also closer to the main shopping areas on Weavers Wharf than Lionfields thus stopping even further segregation of the town centre.</p> <ul style="list-style-type: none"> • There is waste land where Sladen School on Hurcott Road once stood as this was demolished in 2009 and also Sion Hill School. The Magistrates Court and offices should be made into residential housing. • Churchfields site should also be developed (some 3000 houses can be built here according to Ian Hardiman). • Use Lea Castle Hospital site (brownfield site in options A and B combined) for 600-700 houses. Then 10 – 15 years on, further development of Lea Castle Hospital and School site - use of Green Belt extension if absolutely necessary. Green Belt at Lea Castle only released at this stage if deemed necessary for increased housing. No Green Belt site to be released until housing needs are reviewed after 10 years. • I also think that the idea of a cinema on the ex-Glades site is not a good plan. This land could be used for housing and the proposed cinema (if really needed) sited nearer the heart of Kidderminster, and not cut the town into two parts. Is a cinema the future or are green fields for our children and children’s children? What then of the vacant REEL cinema...more housing? <p>We need small scale town centre apartments and flats for our younger people and older residents and not large mass housing 3 to 4 miles outside of a town with poor transport or facilities. Building retirement housing near the town centre will also free up more large family sized homes as per your report, thus negating any need for further building. Smaller flats and apartments will have smaller land footprints too, making the land mass an important factor in determining housing numbers and reducing the overall land required.</p>

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				<ul style="list-style-type: none"> • Development of an entire rural village on Lea Castle Hospital and School site. • Kidderminster town centre has at least 40 large shops and office blocks that stand empty, some for well over a decade. The town centre is in urgent need of regeneration, and I believe that Compulsory Purchase Orders should be made on these. There is waste land where Sladen School on Hurcott Road once stood as this was demolished in 2009 and also Sion Hill School. The Magistrates court and offices should be made into residential apartments. • Re-evaluate the whole 'need' for housing figures and reassess land availability to include recent windfall sites such as Kidderminster Harriers site, Victoria Carpets, Wood Yard next to Matalan etc. Build higher rise, or convert more flats in the town centre to boost numbers (smaller build footprints) for the elderly and younger generation (a good example is Comberton Hill), therefore freeing up existing larger homes. • Stourport in particular also has a number of brownfield sites which are in need of development in order to meet some of the local housing needs of a growing/developing town centre. The now defunct Wyre Forest Golf Course has released some land and there is no reason why the rest should not be released for housing development. <p>I therefore state that all brownfield sites and existing sites must be developed first, and that no land be removed from the Green Belt for at least a minimum period of 10 years.</p>
	LPPO4168	Alternatives	Comment	<p>There is also alternative land abutting south east of Highclere (Land Registry Title no WR95003) that could be incorporated to support improved highway access and additional residential development to avoid the traffic congestion and dangers for both pedestrians and vehicles that already exist at the higher levels in the Park Lane area. This site could also provide improved recreational facilities. It also</p>

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				offers easy access to Bewdley town centre without the need to traverse and negotiate the hazards of Park Lane.
	LPPO4626	Alternative Sites	Comment	There are many alternatives available to develop and expand in and around Kidderminster - several buildings are derelict and have been for several years which could be used for the 1700 homes that you wish to implement. In turn, this could improve the regeneration of Kidderminster town centre and bring the business you desire to the area.
	LPPO3529	Selba Drive	Object	<p>Our own children and their friends made good use of this space playing football, cricket, hide n seek, etc as do our grandchildren.</p> <p>You are building or built Family homes on garage, pub, hall and church sites I assume FAMILY means people with children, just where do you think these families are going to go for a kick about hide n seek, ride their bikes exercise etc (NO BALL GAME SIGNS ARE AROUND THE ESTATE) in a fairly safe environment without being a nuisance to other residents or shop owners children have to play somewhere!The existing parks great for smaller children but not adequate for older ones in the area.</p> <p>We sincerely hope that you can leave us and future residents of Habberley Estate A little bit of green space for us all to enjoy.</p>
	LPPO3997	Paragraph 6.57	Object	There are viable alternatives in Wyre Forest, some of which do not appear to have been fully considered in the current proposals. I do not feel that you have given full consideration to all of the brownfield sites in the Wyre Forest District. We need affordable homes and these do not have to be houses, there is still considerable scope for brownfield development of apartments and flats e.g. Park Lane in Kidderminster, Green Street, site of Crown House, sites of former schools, the Jobcentre etc. Furthermore, with an aging population, we need suitable housing for elderly people to downsize to, developments near town centres and

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				<p>shops are ideal for this. Releasing Green Belt land for development looks like the easy (or lazy) option. You have a responsibility to the people of Wyre Forest to protect our Green Belt wherever possible and I do not believe you have demonstrated that there are insufficient brownfield (or green field non-Green Belt) alternatives.</p> <p>To ensure that any development has good road access and facilities I would support a 'Spennells type' development on the Lea Castle site, which would mean expanding the current proposals for that site. A full development on that site would support a primary school, providing a much needed additional feeder school for Wolverley High school. Creating a 'second Spennells' on the Lea castle site would actually have less impact on local residents as (like Spennells) it could be self-sustaining with the opportunity to provide shops and live/work units providing employment opportunities. Also the Lea Castle site has better road access, being situated between two A roads it already has the necessary road infrastructure as the Wolverhampton Road and Stourbridge Road are already linked (similar to the Spennells Valley Road). This means there would be no 'rat runs' created through residential streets, unlike the Baldwin Road scenario, which would create havoc on the residential streets in the Greenhill area.</p> <p>If you simply built the number of houses proposed for the Baldwin Road site on the Lea Castle site instead – you would create no traffic problems for the immediate neighbours?</p>
	LPPO4466	Alternatives	Comment	Support infill development to south of Kidderminster
	LPPO4690	6.57 Alternatives	Comment	There are still plenty of brownfield sites that should be developed before building on Green Belt land. Half of Kidderminster town centre is empty and abandoned. Town centre development would massively enhance the centre of Kidderminster and reduce the need to travel which would benefit air quality and cause less traffic

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				<p>congestion. The old Glades site and Bromsgrove Street car park which is always empty now. The old abandoned law courts, countless old factories. Old school sites such as Sladen and Sion Hill. The falling down buildings in the Horsefair which I think most people would agree is the street that most desperately requires the Council's help and vast improvements could be made. There are many options that should be implemented first instead of the Council choosing the 'easiest' for development.</p> <p>If houses still have to be built then the Lea Castle site could be extended up to the Wolverhampton Road which I believe wouldn't cause as much upset and loss of quality of life as Options A or B would.</p>
	LPPO4434	Alternatives	Comment	<p>Although the plan states that Brownfield sites have been included, there are more that should be added for Core Housing sites. There are two disused school sites in the Kidderminster area alone, that should be considered; as well as the Lee Castle site and the rejuvenation of the Kidderminster town centre sites such as Bromsgrove Street, the old Law Courts (that have been empty for several years) and of course Crown House, to name just a few. Surely it makes more sense to develop all Brownfield sites to maximum capacity first and only then should Green Belt areas be considered as a last resort.</p>
	LPPO4430	Alternatives	Comment	<p>The poor state of Kidderminster town centre in combination with poor traffic management and congestion around the station do not make Kidderminster an attractive base for commuters working in Birmingham. I believe that development of those brownfield sites closer to the town centre should be maximised to their full potential to ensure housing is affordable and in the right location to provide easy access to amenities and employment for those with both limited means and reduced mobility, particularly the elderly.</p> <p>I propose WFDC also make sustained efforts to encourage development of the Lea Castle, Sion Hill and Sladen school sites which are in prime locations and for which</p>

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				local infrastructure is already present.
	LPPO4625	Alternative Sites	Comment	Derelict school area at Sion Hill, the old Sladen School site are two I passed yesterday on the way home. Both of these are large areas with the ability to host adequate parking.
	LPPO3410	Alternative sites	Object	<ul style="list-style-type: none"> • Kidderminster town centre could provide more housing. • Could use Worcester Street, Bromsgrove Street and The Glades - those housed would then be in walking distance to a lot of services. • 'Political will' at national level needed to deter land banking.
	LPPO3087	Development Suggestions	Comment	<p>Extensions to the Lea Castle site (as in WFDC Options A and B) should be utilised; and land on the Lea Castle site which constitutes the field(s) alongside the Wolverhampton Rd and a "rear" extension of Lea Castle up to Axborough Lane should also be included. This use of land could create a "Lea Castle Village" with around 1,800-2,000 houses. This would create a wholly sustainable community which would be large enough to have a village centre, primary school, community facilities and sustain a bus service. In addition, being in the catchment area of Wolverley High School it would help to make that school sustainable.</p> <p>Further some extension into land adjacent to the Wolverhampton Rd/Wolverley Rd area and Sion Hill Middle School site could also be considered and could provide another 200-300 houses. Development in this area is supported by two main A roads the A449 and A451.</p> <p>I have noted that there is no proposed development at all to the western Kidderminster estates. However a development of 100 – 200 houses as an extension to the Ferndale estate could and should be considered. This estate also has reasonable access to the A449 via Wolverley and could support such a development. In addition there are surplus Secondary School places available to</p>

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				serve this area as Baxter College is seriously undersubscribed.
	LPPO3109	Lea Castle Hospital	Support	This site would be large enough to warrant building all the facilities lacking on the Baldwin Road site. This option would generate a feeling of community spirit and a nice area to live. This choice of site would also please the hundreds of people affected by the use of any of the other proposals.
	LPPO4928	6.57 Alternatives	Comment	<ul style="list-style-type: none"> • Create two clear focus development areas and <u>not</u> a long featureless strip as current. • Maximise development on Lea Castle Hospital site. Include all land up to Axborough Lane, Stourbridge Road and Wolverhampton Road. Include the South (WC/16) and East (WC/32) extensions also. Create a community to include shops, school and bus routes. • Maximise housing development at or near the Kidderminster Enterprise Park – for obvious traffic congestion and environmental reasons. This all include AS/10 and OC/13. Can even more land be obtained in and around Stone? • Ensure Hurcott Lane issue is resolved. Access to Hurcott Woods to be preserved for everyone in the WF community and beyond – but terminating access at the Hurcott Woods car park (in effect making Hurcott Lane a no through road) is a serious option for consideration. Traffic calming chicanes or humps at the edges of Hurcott Village should be considered also. • Existing Core Housing Sites to be reviewed and abandoned if possible. If parts of them must be used – ensure they are done last in the development calendar – after the above two focus development areas are completed.
	LPPO4537	Alternative Sites	Comment	Kidderminster itself would benefit from further regeneration. This could include developing new, quality and affordable homes in Kidderminster itself and on

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				undeveloped brownfield sites. This could be resolved by a smaller development south of Park Gate Road only.
	LPPO4518	Alternative Sites	Comment	The town centre is like a ghost town as it is with all the derelict shops people are moving away from the area not into it.
	LPPO3382	Paragraph 6.57	Comment	The Proposal of a sustainable Village at Lea Castle could be explored more thoroughly allowing 2,000 houses, large enough for a primary school and a bus service, services are already available. Ferndale estate could be extended further, Sladen Site or Sion Hill Middle sch site, the old GPO offices and Magistrates Court? I believe the Brownfield sites within Kidderminster should be looked at as a priority before destroying our beloved and precious Green Belt land, cost alone should not sway this.
	LPPO4523	Alternative Sites	Comment	Any buildings needed would first be built on the brownfield sites that w.f.d.c. have at their disposal. Such as Lea Castle, Sion Hill, Sladen, the old Wyre forest golf course, disused factory units, Stourminster School, the old Victoria cricket ground to name a few that I know of.
	LPPO4525	Alternative Sites	Comment	I believe that there are other sites under consideration which would seem more suitable, in particular the Old Ceramaspeed site in Kidderminster.
	LPPO4375	Alternatives	Comment	Core Housing Sites that could replace Option A to the South of Kidderminster: 'Timber Yard Park Lane' and 'Bromsgrove St' (excluding the Glades site).
	LPPO4365	Alternatives	Comment	There are numerous brown site areas in the area namely Sion Hill school Lea castle hospital Stourminster school also land in park street and various other small sites in the area although we realise would be more costly would undoubtedly clear up some derilict eyesores.

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	LPPO4624	Alternative Sites	Comment	I am at a loss to understand why the site of the former Glades leisure complex cannot be used for house building instead of a cinema etc., at least this will bring necessary footfall to the shops. There are many empty shops in Worcester Street, why cannot these be turned into dwellings?
	LPPO4387	Paragraph 6.57	Comment	Rear of Ceramaspeed - It is on an industrial estate and has wide roads leading to it, which are able to cope with large vehicles. More suitable for Travelling Showpeople site. The surrounding roads also seem to be less busy with day-to-day traffic.
	LPPO4388	Paragraph 6.57	Comment	Rear of Ceramaspeed -This is a far more suitable space for Travelling Showpeople: the industrial estate offers wide roads leading into it, specifically built for large and often articulated vehicles. The roads are less congested by heavy day-to-day traffic so the impact on the general public would be much less.
	LPPO4298	Alternatives	Comment	<ul style="list-style-type: none"> • Under-used warehouse buildings around the centre of Kidderminster • The redundant leisure centre / health centre site. • The large number of empty shops in the town centre including so many redundant upper storeys above the shop fronts.
	LPPO4544	6.57	Comment	I believe it would be more beneficial to make use of the brownfield sites to create more homes and to re-generate the town itself, there are several buildings which would be better utilised in this way rather than left to rot and make the town look like an eyesore. My suggestions are: <ul style="list-style-type: none"> 1. The land which used to be the Glades Leisure Centre, I know there is consultation for it to become a multiplex Cinema which in an ideal world I think would be a brilliant idea, however, realistically speaking young

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				<p>people, families etc. do not attend cinemas as it is far too costly and with modern technology such as Sky, Virgin, Amazon firesticks etc, they can watch all they want by using these methods of viewing at a lot less cost. This is why I think this land would be of more benefit by using it for housing.</p> <ol style="list-style-type: none"> 2. All the empty shops in Worcester Steet, i.e. the old Woolworths, Littlewoods stores and the large amount of charity shops. 3. The Old Magistrates Court. 4. The disused timber yard and warehousing behind Matalan, this would be perfect for town houses or Apartments for canalside living similar to areas in Birmingham which have been re-generated with fantastic restaurants etc. 5. Sion Hill School. 6. Sladen School. 7. The Old Lea Castle Hospital would be ideal as it has two major roads either side of it which would be able to handle the extra volume of traffic no problem, I am confident of this as I travel along these roads everyday to work and there is nowhere near as much traffic on these roads as there is around the Spennells/Aggborough/Offmore areas. The plan to use Lea Castle would also mean using less Green Belt Land than the Spennells proposition. <p>I have lived in Kidderminster for 34 years and have watched the decline of the town over a number of these years I desperately would love the council to carry on rejuvenating the town itself and make it a pleasurable place to visit with more restaurants, maybe an entertainment venue for concerts, shows etc rather than taking away our valuable Green Belt land which once gone will be gone forever.</p>
	LPPO4763	6.57 Alternative Sites	Comment	On page 178 Justification 31.1 it states “there is insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the

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				necessary housing and employment growth required in the plan period.” Why are there no brownfield sites on the plan? ie Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it), partially owned by the Council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster. Why have these areas not been considered and if so then please can you advise on why they are unsuitable ?
	LPPO4766	6.57 Alternative Sites	Comment	On page 178 Justification 31.1 it states “there is insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the necessary housing and employment growth required in the plan period.” Why are there no brownfield sites on the plan? ie Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it), partially owned by the Council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster. Why have these areas not been considered and if so then please can you advise on why they are unsuitable?
	LPPO4865	6.57 Alternatives	Comment	We have numerous brownfield sites, that should and must be built on first, they include old derelict factory units in Green Street, same in Park Lane, the old magistrates court bottom of Comberton Hill, Bromsgrove Street, empty premises in Worcester Street, the land where Sladen school once stood, Sion Hill school. In Stourport we have two parcels of land next to Tesco, plus the old leisure centre land.
	LPPO4870	6.57 Alternatives	Comment	A further and up to date review must be made of available development land in Kidderminster. The Wood Yard to the side of Matalan and buildings behind are all now vacant since the review was completed, as well as the Magistrates Court and many other buildings. If these are not released by the owners, then WFDC should

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				<p>utilise funds and compulsory purchase these sites to develop.</p> <p>It has also been suggested that discussions are ongoing around land available at Kidderminster Harriers for housing. This must be factored into numbers. Some accountability must be taken for further windfall sites occurring, such as the recent carpet factory closures.</p> <p>Move the proposed cinema off Lionfields to one of the empty buildings in the town centre, with associated pubs and restaurants, thus bringing it closer to the Weavers Wharf development, freeing up a lot of space at Lionfields for retirement housing, or young people apartments that would breath more life and energy into Kidderminster, especially early evenings as other towns and cities have done. Comberton Hill development is a very good example of this.</p> <p>With the building of a new cinema, this would release the site of the current 'REEL' cinema for further apartments or resolve the need for additional employment spaces at Easter Park. Many small business owners find it difficult to lease small offices. All that is proposed are large industrial units, there should be a mix.</p> <p>Use both option A and option B for the Lea Castle site, with further development of the site to create a new village with its own identity and facilities, thus supporting the much needed provision of new infrastructure in that area and creating a road to take the traffic to Birmingham from this side of Kidderminster away from the Horsefair and ring road.</p> <p>Development of the array of empty premises in Kidderminster for housing use. Revisit all 'vacant' property in Kidderminster and the use of CPOs as required. Approach Housing associations to support with this.</p>
	LPPO4494	6.57 Alternative	Comment	<ul style="list-style-type: none"> Worcester St; Bromsgrove St car park (exc Fabric shop) plus Glades area.

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		suggestions		<ul style="list-style-type: none"> • Vicar St – over the shops esp former WFDC offices. • Corner of Coventry St/Blackwell St – appears in disrepair • Green St l/h side – the building backing onto Morrisons car park appears to be unoccupied and further down on the left hand side (past Dixon St opposite B&Q) inc the building currently partly used as offices. • Corner of Church St/Ring Rd – shop unoccupied since it was the “Medical Hall”, Church St further accommodation to let . <p><i>I am sure if you look there's plenty more.</i></p> <p>CROWN HOUSE – a car park with accommodation/just accommodation? Maybe inc walkway to the Swan Centre.</p> <p>Make Kidderminster an attractive place; to live, work and shop– be innovative - a forerunner!</p> <p>Planners: -Look at towns on the Continent for inspiration eg France and Germany.</p> <p>Kidderminster town has the potential to be an attractive town with some very nice brick built buildings housing shops, an attractive Town Hall and buildings eg Lloyds Bank but we do have some very unattractive buildings, many empty shops.</p> <p>Along Worcester St there are 12 exc the old Woolworths building. All of the one side of Worcester St backing on to Bromsgrove St could be converted into living accommodation/OAP complex (location pos alleviate loneliness). Incentivise any remaining shops there to move to empty shops elsewhere in town. Any objections/obstacles must be overcome before Green Belt land is considered for building . Bromsgrove St car park and Glades area could be regenerated with housing only inc some green spaces but not so as to encourage anti social</p>

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				<p>behaviour as in Coronation Gardens.</p> <p>Crown House must be demolished; it is an eyesore taking up valuable land. As a nation we cannot afford to continue using land for car parks so multi story car parks must be built rather than surface car parks. So I suggest we demolish Crown House and replace with an attractive brick built multi story car park with the money ear marked to be spent on Worcester St) with living accommodation on the top (as on the Continent) with own secure parking.</p> <p>Nationally as well as locally we should look at every available space for living accommodation. Towns are not what they used to be so we should regenerate them into vibrant areas where people want to live.</p>
	LPPO3465	Para 6.57	Comment	<p>All on going sites that have been left and not developed and are now in a disgusting state, should be finished before any green fields are even touched eg. Sion Hill School, Yew Tree Pub in Broadwaters and Lea Castle Hospital.</p> <p>The centre of Kidderminster is a disgrace. The retail premises that will never ever be used again for business should now be redeveloped for both residential and commercial use, bringing life back into a dying town. This will make it a young vibrant place to live (not everyone wants a house with a garden). The development of the inner town must be the priority long before any further outward expansion of Kidderminster is even dreamed of.</p> <p>All roads and transport infrastructure must clearly defined and planned for before any future developments are contemplated.</p> <p>Education provision should be firmly planned for now, not left for future thought. Health care also needs to be planned for jointly with the NHS.</p>

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	LPPO4538	Extended Lea Castle	Support	<p>We believe that there may be a better option that would safeguard the habitats and lives of the mammals, birds and bats in this area. We suggest that more should be considered on the Lea Castle Site. The footprint of the old hospital has been ear marked for the building of 600 dwellings but the site could accommodate many more. And with a little development on the fringes there it would provide sustainable community that could support its own primary school, and wouldn't be a burden on the Cookley Parish.</p> <p>We ask you to seriously consider the development of the Lea Castle site as a sustainable community and a viable option which would reduce the impact on the proposed Green Belt diminution.</p>
	LPPO4697	6.57 Alternatives	Comment	<p>On page 178 Justification 31.1 it states “there is insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the necessary housing and employment growth required in the plan period.” I would counter that:</p> <ul style="list-style-type: none"> • There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the Council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster. <p>I also strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.</p>
	LPPO4542	Extended Lea Castle	Support	<p>I note Lea Castle site is included in your options but I feel this could be further developed to create more of a brand new sustainable community rather than</p>

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				<p>numerous “add ons” to already established existing areas</p> <p>If the site at Lea Castle were expanded, as it could be, to provide all the current additional housing required this would create more of a community which in turn could provide a new primary school (Offmore school, as I’m sure you are aware, is full to capacity and cannot be extended), also shops and a community area. This would also appeal more to people moving into the area, a brand new site including new local amenities</p> <p>Traffic and new roads could also be better managed and accommodated at this site rather than adding some form of eastern bypass, which would also have to take into consideration the rail track and possible very costly new bridge</p> <p>I would please ask that you consider alternative options and work on creating a new community within Wyre Forest as opposed to causing disconcert to your already established areas.</p>
	LPPO3494	Para 6.57	Comment	<p>There are many sites that should be used: Lea Castle, Sion Hill, Sladen and particularly the old town centre, which is a disgrace, before dwellings are constructed on virgin land. Before any of this building goes ahead the plans for the infrastructure should be passed. Where is the money for the infrastructure coming from? We will need new schools, new Doctors Surgeries and hospitals. The current local hospitals have reached crises point and GP practices are not coping; they cannot get the staff. More doctors and medical staff need to be trained and that takes years. The local schools are full, so more money will need to be spent building new schools. Where is the money coming from?</p> <p>Kidderminster has great potential; it has canals and rivers and a few years ago was a thriving market town surrounded by beautiful country side, but if we are not careful it will become a commuter town that no one wants to visit. Before any</p>

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				more dwellings are built we need to sort the old town centre out, by replacing the empty shops with desirable dwellings and businesses and making it once again a rural town that visitors want to visit.
	LPPO4303	Alternatives	Comment	I propose the use of existing brownfield sites in the centre of town! I appreciate this is more costly to the local council but we really do have to protect the Green Belt at all costs. With rising obesity levels, reduction in emissions and reduction in food miles being the governments prerogative I don't see how you can justify building on green and with so many brownfield sites available.
	LPPO4361	Alternatives	Comment	Rezone areas of Kidderminster town centre for housing.
	LPPO3237	Alternatives	Comment	Plan heavily focused on large development in one area ie Option A Spennells and Hurcott. Fairer to have spread out whatever homes that are needed across more areas. Why nothing in other areas?
	LPPO4258	Alternatives	Comment	Build your houses in the old, empty Woolworths site, on the old Glades site, on Lea Castle, on the old Sladen Site, on the old Sion Hill site, bulldoze the The Horsefair and regenerate this area!
	LPPO3194	Extended Lea Castle	Comment	<p>Alternative Proposal: A Lea Castle “Sustainable Village”</p> <p>Proposed lea castle land extending to the edge of the wolverhampton road at the rear of the site, possibly some development on the western side of wolverly towards sion hill to link with the new development at the sion hill school.</p> <p>Advantages of this proposal: with the additional land we propose including sites in the vicinity already identified by WFDC we believe a community of 2500 houses could be created</p> <ul style="list-style-type: none"> • it would be large enough to support a 2 form entry primary school

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				<ul style="list-style-type: none"> • it would support a village centre and cookley parish without burdening existing facilities • it would be capable of sustaining a bus service • provide like-work units • good impact on the longevity of Wolverly CE high school.
	LPPO4196	Kidderminster Town Centre	Comment	<ul style="list-style-type: none"> • Building more homes around the town centres will reduce car journeys and pollution. • This will regenerate the town centres, to make them more attractive • It is the centre of Kidderminster for example which requires the major investment. • Spreading the home building requirement around other smaller sites will reduce the radical changes in communities across the region.
	LPPO3424	6.57	Comment	<p>Whilst I understand the need for development and understand that inevitably this land will eventually be developed as an expansion of Kidderminster, the immediate development I feel should take into account previously developed land of other areas in Kidderminster, including:</p> <p>Lea Castle hospital site and the former school sites of Sion Hill and Sladen and also the empty buildings along the canal behind Matalan. Once the empty shops in Kidderminster have been regenerated then the space above these stores could also be converted in to flats.</p> <p>I would like to propose the following concerning the general development of the eastern Kidderminster area.</p> <ul style="list-style-type: none"> • That consideration is given to developing firstly all the existing brownfield

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				<p>and/or previously developed areas within Kidderminster. The most significant being the former Sladen and Sion Hill school sites and Lea Castle Hospital site near Cookley</p> <ul style="list-style-type: none"> The former Lea Castle hospital site near Cookley, which is already earmarked for a development of 600 dwelling will put pressure on the existing facilities in Cookley namely the primary School and doctor's surgery. If this site was to be extended to include the land up to the Wolverhampton Road and then Axborough Lane at the rear of the Lea Castle site, then this would enable around 2,000 dwellings to be built. The development would then be a sustainable community and be eligible for its own school, bus service and doctor's surgery, taking the pressure off the village of Cookley. As this area is on the other side of the A449 and already well screened by woodland it would not have a significant visual impact on the village. It would then also be in the catchment area for Wolverley CE High School.
	LPPO4555	Alternative Sites	Comment	<p>There are far more obvious choices to build much needed housing than the Spennells proposed site.</p> <ul style="list-style-type: none"> Firstly the old Lea Castle grounds Also Kidderminster Town Centre, so many empty buildings – make use of this The Old Post Office building. Yes this is an ugly building but make use of it
	LPPO3318	Lea Castle - Sustainable Village	Support	<ul style="list-style-type: none"> Supports Lea Castle proposal so we don't use Green Belt.
	LPPO4428	6.57 Alternatives	Object	<p>On page 178 Justification 31.1 it states “there is insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the</p>

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				<p>necessary housing and employment growth required in the plan period.” I would counter that:</p> <ul style="list-style-type: none"> • There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster. <p>I also strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.</p>
	LPPO4464	Alternative sites	Comment	<p>The plan has not considered Blakedown. Section 13.21 and 13.22 recognises that parking at Kidderminster Railway station cannot be expanded easily but there is scope at Blakedown. I believe the Local Plan should be revisited to include Blakedown particularly given the recent new residential development in that area.</p> <p>The Local plan is biased. It should also cover Blakedown. It is not in accordance with the guidelines for Public Consultation and falls short of both YouGov and Rural and Town Planning Institute best practice and needs to be revisited.</p> <p>Kidderminster town centre as it is now is devastated. With the retail sector hit so hard by internet sales it seems unlikely that we can revitalise the old high street to sustainable levels. So why is nobody talking about converting the old Woolworths/Littlewoods buildings into nice new apartment blocks with plenty of accessible parking at the rear and only a short walk to both the station and weavers wharf and how this might help to stimulate the local economy in more effective ways?</p>

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	LPPO3557	Alternatives	Comment	Any new developments should be in brownsites wherever possible.
	LPPO3943	6.57	Comment	<p>I would urge the Council to explore fully and rigorously pursue all brownfield sites and Green Belt use 'would be a last resort'.</p> <p>There are redundant, buildings in Kidderminster town centre that are ripe for conversion. Buildings are becoming available, even since the publication of the Draft Local Plan, for example the re-location of the Job Centre. Regeneration of Kidderminster town centre must be central to WFDC priorities. In the absence of any SWOT analysis, how can we assume that we can attract people to the area and fulfil the anticipated population growth? Without a commitment to and rapid development of the town centre, we run the risk of depleting our Green Belt for the purposes of unfounded WFDC aspirations.</p> <p>We may face the scenario of many empty newly built houses, sacrificed Green Belt, serious disregard for environmental issues, a nebulous plan for an Eastern Relief Road, but no plan for a road to alleviate traffic congestion from both the Wolverhampton and Stourbridge roads, areas to which the OAHN Report suggests we have greatest connection.</p>
	LPPO3091	Alternative sites	Comment	Extensions to the Lea Castle site (as in WFDC Options A and B) should be utilised; and land on the Lea Castle site which constitutes the field(s) alongside the Wolverhampton Rd and a "rear" extension of Lea Castle up to Axborough Lane should also be included. This use of land could create a "Lea Castle Village" with around 1,800-2,000 houses. This would create a wholly sustainable community which would be large enough to have a village centre, primary school, community facilities and sustain a bus service. In addition, being in the catchment area of Wolverley High School it would help to make that school sustainable.

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				<p>Further some extension into land adjacent to the Wolverhampton Rd/Wolverley Rd area and Sion Hill Middle School site could also be considered and could provide another 200-300 houses. Development in this area is supported by two main A roads the A449 and A451.</p> <p>I have noted that there is no proposed development at all to the western Kidderminster estates. However a development of 100 – 200 houses as an extension to the Ferndale estate could and should be considered. This estate also has reasonable access to the A449 via Wolverley and could support such a development. In addition there are surplus Secondary School places available to serve this area as Baxter College is seriously undersubscribed.</p>
	LPPO4884	6.57 Extended Lea Castle	Comment	<p>The Lea Castle site offers a great opportunity to have a comprehensive plan for a sustainable community with every amenity available that would make a first class environment. With the Wolverley High School available, a new primary school would be warranted. The entire area should be included by immediately approaching the landowner of the remaining area, with a generous offer. The areas on the other side of the A449 would complement this development, with good access to major roads.</p>
	LPPO4500	Extended Lea Castle	Support	<p>Proposal: To FULLY develop the Lea Castle site with the construction of 1000 plus dwellings supporting its own schools, shops, businesses and other amenities which smaller developments would be incapable of. This would ameliorate the necessity of travelling to other locations so overall traffic would be reduced.</p> <p>I acknowledge and accept that, with increasing population, provision has to be made for additional housing. Thus, my recommendation would be to FULLY develop the Lea Castle site to its FULL potential of in excess of 1000 homes etc as above. Lea Castle can be accessed by TWO main routes, namely A491 and A449 in addition to secondary roads and is of sufficiently far from Stourbridge to maintain</p>

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				<p>substantial “green” areas for environmental and aesthetic advantage.</p> <p>This single development, if adopted, would more than compensate for several of the lesser projects such as Baldwin Road and South of Stourbridge Road, Hurcott.</p>
	LPPO4501	Extended Lea Castle	Support	<p>Proposal: To FULLY develop the Lea Castle site with the construction of 1000 plus dwellings supporting its own schools, shops, businesses and other amenities which smaller developments would be incapable of. This would ameliorate the necessity of travelling to other locations so overall traffic would be reduced.</p> <p>I acknowledge and accept that, with increasing population, provision has to be made for additional housing. Thus, my recommendation would be to FULLY develop the Lea Castle site to its FULL potential of in excess of 1000 homes etc as above. Lea Castle can be accessed by TWO main routes, namely A491 and A449 in addition to secondary roads and is of sufficiently far from Stourbridge to maintain substantial “green” areas for environmental and aesthetic advantage.</p> <p>This single development, if adopted, would more than compensate for several of the lesser projects such as Baldwin Road and South of Stourbridge Road, Hurcott.</p>
	LPPO4789	6.57 Alternatives	Comment	Develop land at rear existing Ferndale estate and on western side of Wolverley Road to link up with the Sion Hill school site.
	LPPO4791	6.57 Alternatives	Comment	<ul style="list-style-type: none"> • Develop the Lea Castle site as a sustainable community with own Primary School so as not to impact on Cookley Village. • Positive impact on Wolverley High School’s long term viability. • Regenerate the town centre/empty sites through area • Include other sites in the North/West of Kidderminster, Bewdley and Stourport on Severn

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	LPPO4792	6.57 Alternatives	Comment	<ul style="list-style-type: none"> • Develop the Lea Castle site as a sustainable community with own Primary School so as not to impact on Cookley Village . • Positive impact on Wolverley High School’s long term viability. • Regenerate the town centre/empty sites through area • Include other sites in the North/West of Kidderminster, Bewdley and Stourport on Severn.
	LPPO4828	6.57 Alternatives	Comment	<p>There is an overprovision of retail within the town particularly around Worcester Street.</p> <p>There may well be potential for further development along the River Stour and canal.</p> <p>With 2500 on the housing waiting list and the sort of affordable housing for which there is the greatest need would be best provided within the town centre vicinity where amenities are greatest.</p> <p>Development should be based initially on brownfield sites as well as the Lea Castle hospital site. The quantum of these appear to be well over 4000 plots. Greater scrutiny is needed to ascertain additional redevelopment potential within the town centre where over provision of retail accommodation is leading to large numbers of empty and underutilised shops.</p> <p>The sort of affordable housing for which there is the greatest need would be best provided within the town centre vicinity where amenities are greatest.</p> <p>Should be greater emphasis on town centre redevelopment, wider dispersal across the District as set out in Option B. This would include Lea Castle and potentially sites to the west of the District and also potential expansion of Chaddesley,</p>

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				Harvington and Blakedown which are nearer Birmingham and the Black Country.
	LPPO4796	6.57 Alternatives	Comment	Kidderminster Town Centre requires urgent attention to revive it. The removal of the outdated and outmoded shops on the left side of Worcester Street, the Woolworth building etc, would give room to emulate the successful conversion of the Wyre Forest Housing offices. This would give reasonable density, affordable housing in the middle of town. Owners/tenants would be close to shops, bus and train connections, as well as the Council Hub and new Medical Centre. We need to lobby the Government if need be, to rejuvenate the centre of town, there are many small areas of brownfield sites which are still waiting to be taken in hand. Please, for everyone's sake, ignore the blandishments of large building companies, and use local builders to make the town hum again.
	LPPO4795	6.57 Alternatives	Comment	Kidderminster Town Centre requires urgent attention to revive it. The removal of the outdated and outmoded shops on the left side of Worcester Street, the Woolworth building etc, would give room to emulate the successful conversion of the Wyre Forest Housing offices. This would give reasonable density, affordable housing in the middle of town. Owners/tenants would be close to shops, bus and train connections, as well as the Council Hub and new Medical Centre. We need to lobby the Government if need be, to rejuvenate the centre of town, there are many small areas of brownfield sites which are still waiting to be taken in hand. Please, for everyone's sake, ignore the blandishments of large building companies, and use local builders to make the town hum again.
	LPPO3960	Alternative suggestions	Comment	Develop the Lea Castle site with additional land proposed which we believe would sustain a community of between 2000 and 2500 house, which would support a 2 form entry Primary School and would not impact on Cookley Village Centre. It would be within the catchment area of Wolverley High School and would positively impact on its long term viability. There are many empty sites around the Kidderminster area, i.e. Sladen School site,

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				<p>Sion Hill School site, the Horsefair, and land in Park Lane leading to Matalan which could be used for housing. Also the town centre needs regenerating — why not use the Crown House for flats, the top of shops in Worcester Street as flats and also use the Glades land and surrounding land for housing.</p> <p>Kidderminster does not need a Multicomplex cinema and more shops. The cinemas in the surrounding areas are empty because of the cost of tickets.</p> <p>WFDC is wrong not to propose any development on the north/west of Kidderminster, Bewdley or Stourport on Severn as we feel there are areas which could be developed within these catchment areas.</p> <p>Why have Franche and Ferndale not been included in the Options, both areas have fields many of which are used for horse grazing.</p>
	LPPO4290	Extended Lea Castle	Comment	<p>Building on non-agricultural land, such as Lea Castle must be a better option.</p> <p>Would enable a ‘community spirit’ to develop, and a new Primary School and shops could be built.</p> <p>This area is within easy reach of the town centre and hospital and has good road links for a bus service.</p> <p>Better relief for the Horsefair would come from a complete redevelopment with flats above the shops for first time buyers.</p>
	LPPO4815	6.57 Alternatives	Comment	<p>There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with VVWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site.</p> <p>I also strongly suggest that you consider other brownfield sites such those I have</p>

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				outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.
	LPPO4819	6.57 Alternatives	Comment	<p>There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with VWWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site.</p> <p>I also strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.</p>
	LPPO3416	Alternatives	Comment	Are sufficient brownfield sites in Wyre Forest area to accommodate the housing needs.
	LPPO4057	Alternatives	Support	Use Parson Chain/Brownfield sites first.
	LPPO3563	Alternatives	Comment	Redevelop housing in the town centre i.e. Worcester Street and Park Lane.
	LPPO4216	Town centre sites	Comment	The Council need to redevelop housing within the town centre, i.e. Worcester St and Park Lane.
	LPPO3982	Lea Castle	Support	The proposal of an alternative site is more suitable i.e. 'land on Lea Castle' area, for said developments.
	LPPO3991	Extended Lea Castle	Support	<p>I propose an alternative: Lea Castle 'Sustainable Village' using WFDC proposals for land at Lea Castle (Option A & B) extended to the Wolverhampton Road/Agborough Lane as site would:</p> <ol style="list-style-type: none"> 1. accommodate 2,000-2,500 houses

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				<ol style="list-style-type: none"> 2. be large enough to build/support 2 primary schools. 3. enhance Cookley parish facilities. 4. be within Wolverley CE High School catchment. 5. support its own village centre
	LPPO4008	Alternative suggestions	Comment	<p>Use:</p> <p>Lea Castle site which has road systems in place/would have less impact.</p> <p>Zortech Avenue/the former golf course plus former Parsons Chain Company before Green Belt</p>
	LPPO3104	Alternative Sites	Comment	<p>I would propose further development of the Lea Castle site which could provide 2000-2500 houses.</p> <p>This development would provide a small/medium sized community, which would be large enough to support a Primary School and a Bus Service. It would also be in the catchment area of Wolverley High School to give a positive impact on the school's long term viability.</p> <p>Whichever options are chosen the road network needs significant improvements to maintain safety and minimise congestion.</p>
	LPPO3101	6.57	Comment	<p>I believe that the OCAG-LP group proposal for a sustainable village located at Lea Castle shows far more merit than the proposal put forward by WFDC, and request that you consider this as a viable alternative.</p> <p>In addition, I would like to see serious consideration given to the creative regeneration of the town centre, to include converting some of the unused warehouses into living accommodation.</p>

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	LPPO3108	6.57	Comment	I suggest not only the use of all available brownfield sites before considering any reduction of the Green Belt, also, there are many thousands of empty or derelict houses in this country, these should be renovated & put back into use.
	LPPO4510	Paragraph 6.57	Comment	<p>Anyone driving into Kidderminster from Stourbridge, via The Rose Theatre junction, must feel instantly depressed, it looks so awful!</p> <p>There are all the depressing closed shops. They could bring life to the town centre as housing, if they were developed into apartments and flats.</p> <p>All around Kidderminster there are Brownfield sites, standing derelict and depressing.</p> <p>There should be a time limit set for development of these sites. Again, re-vitalising the town centre.</p> <p>Kidderminster could be in the for- front of town centre revival in a new and different way. With on-line shopping, town centre shops will never be the same!</p> <p>Make the residents of Kidderminster, proud of all areas of our town and the impression which it gives to visitors.</p>
	LPPO3249	Lea Castle - Sustainable Village	Support	I do support the proposal from OCAg for a Lea Castle Sustainable Village.
	LPPO4514	Lea Castle	Comment	<p>Building on that site would not interfere with the local community or cause excessive traffic in an already built up area.</p> <p>Wolverley high school is not over subscribed so would have spaces for the new community. This would also support their long term viability</p>

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	LPPO3256	Alternatives	Comment	<p>To regenerate the Centre of Kidderminster, has any body thought of demolishing the shops from the old Woolworths downwards and building residential homes and flats to blend into the walk and shopping area.</p> <p>I believe it would add to the housing shortage and also bring life back into the centre of town by attracting new business due to there presence.</p>
	LPPO3507	Alternatives	Comment	There are lots of brown sites not used yet before using Green Belt
	LPPO3264	Lea Castle	Support	<p>I believe that a better option is for the brownfield site of Lea Castle to be developed to meet Kidderminster's needs, this makes much more sense as it is close to the 449 Wolverhampton Road and the Stourbridge road, also would eliminate the need for a very expensive bypass. The development would be large enough to serve a small primary school and feed on into the secondary school at Wolverley which has the capacity to take the children.</p> <p>With shops and doctors added it would become a desirable place for families to live, providing a very substantial income for the council at minimal cost.</p>
	LPPO4535	Alternative Sites	Comment	Wouldn't it be far better to build a totally new village within the district thereby, again, giving residents what they want - access to green space all around?
	LPPO4188	Alternatives	Comment	Look at alternative sites outside of the town on the Kidderminster side with direct access to the by pass opposite the safari park. This will at least keep the extra traffic away from passing in and out of an already busy little town.
	LPPO4515	Alternative Sites	Comment	There are large areas in Kidderminster which need redevelopment.....sion hill school site, old glades site, town centre empty units and flats above to name a few. These should be redeveloped BEFORE green sites are built on. This would prevent the town centre dying and Kidderminster being spread out thinly until it meets surrounding villages.

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	LPPO4620	Paragraph 6.57	Comment	I would feel the most safest route for cyclists and people wanting a footpath would be down Kendlewood Road and then on to the main Stourbridge Road and through Broadwaters and then down into Kidderminster town centre.
	LPPO4621	Paragraph 6.57	Comment	Some people would be better positioned on the Lea Castle site e.g those people commuting to Wolverhampton and Stourbridge daily. There are many disused buildings and abandoned sites in Kidderminster that could be put to use before carving up the countryside. In particular, the Horsefair area has been in severe need of redevelopment since I first came to live in Kidderminster in 1972. If I was visiting Kidderminster for the first time from the Stourbridge side of town, I wouldn't bother stopping.
	LPPO3369	6.57 Alternative sites	Object	There are alternatives, Lea Castle, the Ferndale estate, the Old magistrates court and market building, standing empty for many years. Brownfield sites first please. The old telephone exchange is a good example of using existing buildings. Now housing for nice flats. More of this sort of planning would not only be better for Kidderminster generally but would put life back into the town itself. Let them be a role model to show that Kidderminster people and wildlife matter in these days of capitalism.
	LPPO3372	Lea Castle - Sustainable Village	Comment	The Lea Castle Option would be the least disruptive all round and should be given very serious consideration. Create a large housing estate on the 'Lea Castle Hospital' site that has its own shops and services.
	LPPO4374	Alternatives	Comment	Employment could be within the South Kidderminster Enterprise Zone: 'Adjacent Ceramaspeed', 'Victoria Carpets Sports Ground' and land between Hoo Farm & Summerfield and opposite Easter Park.
	LPPO3457	Alternative Sites	Comment	My preferred option is for the council to develop all the brownfield sites and disused building around Kidderminster, including revitalising the town centre,

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				before any further plans are considered. Allowance for current negotiations with Europe should be completed before any agreement regarding proposed housing requirements are made.
	LPPO4623	Alternative Sites	Comment	<p>There are many areas in Kidderminster town centre that would benefit from homes being built within them, above shops, renovating old buildings or flattening them and re-building flats, not everyone has transport so the need to stay in the town close to the bus/train station is a necessity. There are plenty of alternatives.</p> <p>We have a very beautiful town that could be made better, by making the town centre a place people will want to live and be happy.</p>
	LPPO3578	Selba Drive	Object	<p>This land was given to the Council on completion of the Self Build on the understanding that it would not be built on but be left as open access land for people to enjoy. To now contemplate its use for building flies in the face of that understanding. It is well used by a great many people both young and old for many purposes and should remain as such.</p> <p>A wonderful outlook, on an open aspect and where so many can enjoy themselves.</p> <p>Please register my objection against this land being used for accommodation either now or in the future.</p>
Kidderminster Golf Club	LPPO3162	Crown house	Object	<ul style="list-style-type: none"> • I fail to understand why you have not considered demolishing the Crown House/bldgs in the Bull Ring to make way for a new development. • Three storey flats or shops/offices could provide income for the Council in lieu of present income. • The building is a disgrace and does deter visitors from the town centre. • The exterior is dirty and detracts from other welcome developments.

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	LPPO4198	Paragraph 6.57	Comment	Please look at alternative sites i.e. town centre and regenerate a dying and sad town centre
	LPPO4239	Option B	Comment	The WFDC proposals at the Leas Castle site would be more suitable to incorporate community, facilities to sustain a 'village community' and, I believe that the site does not hold 'Green Belt' status.
	LPPO4825	Alternatives	Object	Development of all the brownfield sites should take place before using any other land. Whilst the council have identified some brownfield sites, we take the view that there are more which should and could be considered. There is a large disused property behind Matalan (Park Lane), there is an old building, (inhabited by pigeons) opposite Aldi on Green Street and there are many empty town centre shops. The old Woolworths for example could be turned into an indoor market with small shop units on the ground floor and crate flats above.
	LPPO3477	Extended Lea Castle	Support	Facilities of gas, electric and sewage, plus a foot print of a previously existing school. Would extend the long term viability of Wolverley CH High School. <ul style="list-style-type: none"> 1. Contained on one site. 2. Less disruption to the Green Belt. 3. Lower costs.
	LPPO4199	6.57 Extended Lea Castle	Support	We support the proposal for Lea Castle sustainable village which would allow for a community development, complete with primary school and would be capable of sustaining a bus service.
	LPPO4187	Alternatives	Comment	We are strongly in favour of small scale sympathetic housing development at the following sites; <ul style="list-style-type: none"> 1. The old workhouse at 64 High Street, Bewdley 2. The existing Fire Station and surrounding land off the Load street car park

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				in Bewdley. We understand both these sites are included in the extant local plan so cannot understand why they are not included in this revised draft plan.
	LPPO5113	Alternatives	Comment	<p>The Council are also suggesting the building of a multiplex cinema (again been proposed since they knocked down the original cinema) and yet more shops and restaurants in Bromsgrove Street, but they need a developer for this. Why not use the land for building low cost housing within walking distance of the town and station? That would regenerate the area more than a cinema.</p> <p>Greater vision is needed by the Council. In the report they talk about people wanting to come to Kidderminster to live. Have they actually walked round Kidderminster town centre lately? There is a vast amount of empty factories, shops, etc. that could be knocked down and used for houses. I have been here 36 years and many of the factories that were empty and derelict when we came here are still empty and derelict. Before building on Green Fields the council should look to compulsory purchase some of these premises to rebuild as living accommodation.</p>
	LPPO5111	Alternatives	Comment	<p>Serious consideration should be made in redevelopment of all Brownfield areas within Wyre Forest especially Kidderminster, where we have a lot of smaller sites within residential areas which are standing empty (some for many years) and not being used. Some Brownfield areas such as Lea Castle (again empty for years) are a larger area which could sustain a community in its self. If these areas were redeveloped at least the public could see the town is being regenerated, like the Silverfields ongoing project. Although this has slowed down considerably of late....are houses actually being sold? is there the demand for the properties being built there?</p>

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				There may not be the land area through Brownfield sites to accommodate the number of dwellings required overall but would be less impact on the environment and nature by using these previously used sites instead of Green Belt!
	LPPO5010	6.57	Comment	<p>Kidderminster town is run down, untidy, and lacks investment. The only upside to the town is the location of Green Belt countryside that surrounds it.</p> <p>The town has numerous locations that require redevelopment that would create lots of housing opportunities which would regenerate the centre. This would surely be the better option for the town and it's people and would show that the Council are committed to building a better Kidderminster.</p>
	LPPO5119	Alternatives	Comment	There a number of old unused buildings in and around the town which should be redeveloped and provide an infrastructure to support the houses before further houses are built.
	LPPO5126	Alternatives	Comment	<p>Sites which are brownfield and not part of the town's natural surroundings should be built on first. The Lea Castle area will not affect Kidderminster residents the way the Spennells proposals will.</p> <p>There is also a large number of vacant properties, residential and commercial, around Kidderminster and the rest of the district.</p>
	LPPO5120	Alternatives	Support	In and around the town centre there are disused building and unoccupied plots which if not built on must be subject to compulsory order in the first instance. The Crown House typifies our very poor use.
	LPPO5116	6.57	Comment	Please reconsider with thoughts of a realist rather than an idealist. Many people commuting to Birmingham and Worcester desire to live in the country and you should work on a plan to build more villages on some green field sites outside Kidderminster to give people this option. This would disperse the concentration of

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				<p>people entering an already grid locked system.</p> <p>Younger people prefer to live nearer town centres so housing should be provided close to or in the town centre where there is a wealth of entertainment and recreation and this could help revitalise the area. Young people do not tend to want to live on housing estates far away from all the amenities which is what you suggest in the easier option A.</p> <p>The present road between Black Bridge and Hagley should become a major dual carriageway with housing near it to rid the Worcester Road Island of its bottleneck.</p>
	LPP04936	6.57 Alternatives	Comment	<p>There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster.</p> <p>I strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.</p>
	LPP04931	6.57 Alternatives	Comment	<p>There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the Council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster.</p>

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				I also strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.
	LPPO5096	6.57 Alternatives	Comment	<p>If more housing is needed in Wyre Forest District (there is a big question mark over that presumption), then wouldn't it be far better to build a totally new village within the district thereby, again, giving residents what they want - access to green space all around?</p> <p>Just one other point, why is there no proposed development in Wolverley?</p>
	LPPO5142	Alternatives	Comment	I believe there are several more suitable sites available, Lea Castle, Sion Hill old school, Forest Glades area come immediately to mind.
	LPPO5151	Alternatives	Comment	With regard to housing development Lea Castle was identified, and we would hope this would be confined to housing, but we cannot recall mention of the use of Sladden or Sion Hill Schools as being potential development sites. There is now a substantial vacant plot in Park Lane previously occupied by timber merchants and this appeared nowhere in the proposal.
	LPPO5140	Alternatives	Comment	A more appropriate site for development would be the derelict use Lea Castle Site which could provide a functioning village community. There are also sites within Kidderminster which could be developed such as Worcester Street, Crown House and the Old Leisure Centre area.
	LPPO5139	Alternatives	Support	<p>Until all of the brownfield sites, of which there are many, have be used and/or considered, no building on Green Belt land should go ahead. The Green Belt is for all to enjoy for many generations to come and if it is constantly used for building projects there will be none left for future generations.</p> <p>All councils should stop looking at cost of everything and start considering the</p>

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				<p>value of the Green Belt for everyone to enjoy.</p> <p>Look more closely at the available brownfield sites and we are sure you will find enough for the developments that are planned. This will take more time but the easy option is not always the best</p>
	LPPO5131	Alternatives	Comment	My proposal would be for Lea Castle site to be developed with the Sion Hill School being included in the development.
	LPPO4944	6.57 Alternatives	Comment	<p>There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster.</p> <p>I strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.</p>
	LPPO4476	Extended Lea Castle	Comment	<ol style="list-style-type: none"> 1. This site is large enough to build beyond the existing foot print of the old hospital, therefore making it a viable proposition for a large site that could include a variety of houses, shops a school and a doctors surgery, it could also have its own bus route. 2. The area is also isolated by tree's and wouldn't be as visible 3. The area already has all the utilities 4. The community at a Lea Castle site (Lea Castle Village) would be in the catchment area for Wolverley School, which secure the Schools future. 5. We feel such a large development would promote its own vibrant, sustainable community. 6. The Spennell's site was developed in the 70's and has proven to provide

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				housing and a community feel, could a similar development to this not be considered for Lea Castle?
	LPPO4545	6.57	Comment	<p>I believe it would be more beneficial to make use of the brownfield sites to create more homes and to re-generate the town itself, there are several buildings which would be better utilised in this way rather than left to rot and make the town look like an eyesore. My suggestions are:</p> <ol style="list-style-type: none"> 1. The land which used to be the Glades Leisure Centre, I know there is consultation for it to become a multiplex Cinema which in an ideal world I think would be a brilliant idea, however, realistically speaking young people, families etc. do not attend cinemas as it is far too costly and with modern technology such as Sky, Virgin, Amazon firesticks etc, they can watch all they want by using these methods of viewing at a lot less cost. This is why I think this land would be of more benefit by using it for housing. 2. All the empty shops in Worcester Steet, i.e. the old Woolworths, Littlewoods stores and the large amount of charity shops. 3. The Old Magistrates Court. 4. The disused timber yard and warehousing behind Matalan, this would be perfect for town houses or Apartments for canalside living similar to areas in Birmingham which have been re-generated with fantastic restaurants etc. 5. Sion Hill School. 6. Sladen School. 7. The Old Lea Castle Hospital would be ideal as it has two major roads either side of it which would be able to handle the extra volume of traffic no problem, I am confident of this as I travel along these roads everyday to work and there is nowhere near as much traffic on these roads as there is

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				<p>around the Spennells/Aggborough/Offmore areas. The plan to use Lea Castle would also mean using less Green Belt Land than the Spennells proposition.</p> <p>I have lived in Kidderminster for 34 years and have watched the decline of the town over a number of these years I desperately would love the council to carry on rejuvenating the town itself and make it a pleasurable place to visit with more restaurants, maybe an entertainment venue for concerts, shows etc rather than taking away our valuable Green Belt land which once gone will be gone forever.</p>
	LPPO4305	6.57 Alternatives	Comment	<p>Kidderminster Town Centre has now shifted towards Weavers Wharf Shopping Centre and therefore I cannot see that Worcester Street will ever become a vibrant shopping street again as peoples' shopping habits have changed dramatically over the last decade. All the derelict shops could be changed to town housing, flats and apartments, making it ideal for affordable housing where people will be in the heart of the town which will help local businesses enormously. This would then alleviate the "ghost" town part of Kidderminster and link up with the proposed building on the old Glades Sports Centre and the old Magistrates Court complex.</p> <p>Where the British Heart Foundation shop burnt down on New Road, Kidderminster would also be ideal for flats.</p>
	LPPO3948	6.57	Comment	<p>Rather than building on land resulting in a loss of community leisure space and affecting an SSSI, why not build flats and apartments above the empty shops in the town centre or build at the rear of the Ferndale estate?</p>
	LPPO4549	6.57	Comment	<p>Is the land by Tesco in Stourport to be developed at last. Is the land on Ferndale where the Eagles Nest pub used to stand to be developed at last? How many more houses are there to be built on the Silverwoods site? What about the old school sites such as Sladen in Hurcott Road or the site on Sion Hill? There are several</p>

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				other sites which look in need of tidying up and developing where housing would enhance the area.
	LPPO4307	6.57 Alternatives	Comment	<p>I would love to see a regeneration programme that really lifts the spirits of the people of Kidderminster. Can we have proposals that would enhance the Wyre Forest and make it an area we would be proud to live in?</p> <p>In the light of the Kidderminster/Stourport link road, my vision would include:</p> <ul style="list-style-type: none"> • re-purposing empty units and building new units in Stourport Road area to provide retail (like Primark) and companies (like OGL). • look at what attracts people to the Merry Hill and include those shops in this area to encourage people to stay and shop local. • relocate all the warehouse companies from New Road to the Stourport Road area. • build all the affordable housing you require on New Road. Young people will be most attracted to this area because of its close proximity to the Railway Station and Town Centre. • provide affordable housing very near the town centre and railway station. • regenerate current town centre to provide excellent retail and attract shops. • more businesses with highly paid jobs • bungalows with beautiful views lots of generous sized rooms and a nice sized plot for well off elderly people to encourage old people to move from their family homes • new spacious four bedroomed houses with beautiful views, three/four reception rooms, quite large garden, definately not open plan and overlooked. • relieve congestion, making journeys to work easier. • regenerate parks that are free for people to visit.

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				<ul style="list-style-type: none"> • help schools regenerate and develop • help hospitals provide the best care for all local people. <p>The following makes me feel sad:</p> <ul style="list-style-type: none"> • only retail, tourism and leisure jobs being provided. • 50% of the extra houses on the Green Belt land on the edges of town being for affordable housing that are a stepping stone to help people get on the housing ladder and not forever homes, beautiful houses/bungalows. • a new road near housing that will create noise and pollution. • turning the top of Spennells from a desirable, quiet, place to live, on the edge of town to a dreadful place to live. • taking away habitat for wildlife. • taking away free green space for Spennells' people to visit on foot. <p>Please consider creating:</p> <ul style="list-style-type: none"> • Housing within close proximity of the railway station (easy walking distance). • Housing within close proximity of the town centre (easy walking distance). <p>With this in mind could the following be considered:</p> <p>New Road is full of shops that could be relocated (perhaps some to the vacant shops within the town centre and vacant units on the Stourport Road) and housing built on both sides of the road. This would provide housing that is near the town centre, railway station and canal.</p> <p>I also think lots of care should be taken to provide quality, free, places to go.</p>

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				Sanders Park in Bromsgrove is much nicer than any park in Kidderminster and could be used as a model for Spennells Park.
	LPPO3950	Lea Castle	Support	Concentrate development in one area, ie Lea Castle with a shop/school so that it is independent. Cookley and Wolverley village schools are already under stress and this site has easier road access than most.
	LPPO3211	Extended Lea Castle	Support	There are many derelict and empty buildings in Kidderminster town centre, and the Council should use its power and compulsory purchase orders to acquire these and make good living provisions for the elderly and young (flat type apartments) and rejuvenate the existing town centre. Use the Lion Park for 100% housing, and move the proposed cinema 'leisure complex' to another area of the town centre, rather than separating the town even further. Lea Castle site needs to be developed in its entirety and made into an urban village which would accommodate all housing needs. Any vacant houses in the area need to be bought back to use. There are currently very many vacant and 'for sale' properties in Kidderminster, and with the suggestions as above, including the review of housing numbers, there is plenty of available land for development and I cannot see any need for building or removing the Green Belt in Option A for at least 10 – 15 years, so it is the Council's duty to protect this for as long as possible.
	LPPO4398	Alternative Sites	Comment	Use brownfield sites instead of Green Belt land
	LPPO4502	6.57 Alternative suggestions	Comment	I suggest use of Brownfield sites/empty buildings in town first to help the smaller numbers of new residents integrate more easily.
	LPPO3973	Pra 6.57	Comment	I feel that if extra homes really do need to be built the Lea Castle site should be developed as it is currently unused. Also Crown House could be re-developed into flats instead of being the eye-sore it is now, and the old Wyre Forest Glades site is not showing much signs of anyone being interested in developing it, so this could also be used for flats. There is also the land previously occupied by a builder's

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				merchants at the back of Matalan.
	LPPO4195	Extended Lea Castle	Comment	<p>Extending the current Lea Castle proposed development site could provide a 'village' style community with shops and a primary school.</p> <p>This site would be much less of an impact on agricultural land</p> <p>It would be within catchment area for Wolverley High School and help to sustain the long term viability of that school.</p> <p>It would not require major new road building schemes.</p>
	LPPO4578	6.57	Comment	<ul style="list-style-type: none"> • Develop the Lea Castle site with additional land proposed which we believe would sustain a community of between 2000 and 2500 house, which would support a 2 form entry Primary School and would not impact on Cookley Village Centre. It would be within the catchment area of Wolverley CE High School and would positively impact on its long term viability. There are many empty sites around the Kidderminster area, i.e. Sladen School site, Sion Hill School site, the Horsefair, and land in Park Lane leading to Matalan to mention a few which could be used for housing. • Also the town centre needs regenerating — why not use the Crown House for flats, the top of shops in Worcester Street as flats and also use the Glades land and surrounding land for housing. Kidderminster does not need a Multi complex cinema and more shops. The cinemas in the surrounding areas are empty because of the cost of tickets. <p>We believe Wyre Forest District Council are wrong not to propose any development on the North/West of Kidderminster, Bewdley or Stourport on Severn as we feel there are areas which could be developed within these</p>

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				catchment areas.
	LPPO4579	6.57	Comment	<ul style="list-style-type: none"> Develop the Lea Castle site with additional land proposed which we believe would sustain a community of between 2000 and 2500 house, which would support a 2 form entry Primary School and would not impact on Cookley Village Centre. It would be within the catchment area of Wolverley CE High School and would positively impact on its long term viability. There are many empty sites around the Kidderminster area, i.e. Sladen School site, Sion Hill School site, the Horsefair, and land in Park Lane leading to Matalan to mention a few which could be used for housing. Also the town centre needs regenerating — why not use the Crown House for flats, the top of shops in Worcester Street as flats and also use the Glades land and surrounding land for housing. Kidderminster does not need a Multi complex cinema and more shops. The cinemas in the surrounding areas are empty because of the cost of tickets. <p>We believe Wyre Forest District Council are wrong not to propose any development on the North/West of Kidderminster, Bewdley or Stourport on Severn as we feel there are areas which could be developed within these catchment areas.</p>
	LPPO3572	Alternatives	Comment	Question: Why has it not been possible to develop the brownfield site – formerly Parson’s Chain. Reilloc Chain was developed almost immediately after closure?
	LPPO3987	Extended Lea Castle	Support	My proposal is to extent the Lea Castle site WFR/WC/15/16/32 to include all the area between Axborough Lane, Stourbridge Road, Park Gate Road and the Wolverhampton Road. This would form a liveable village community, which should include shops, amenity for children, a Primary School and possibly a surgery and bus service. In making a self contained community its impact on Cookley would be greatly reduced and it would be in close proximity to Wolverley CE High School,

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				enhancing its long term future.
	LPPO3999	Alternative suggestions	Comment	<ul style="list-style-type: none"> • The inclusion of land not previously in the local plan would distribute development. • Development of the readily accessible Lea Castle site by combining options A plus B/Wolverhampton Road/Axborough Lane to create a community with schools/bus service would have less environmental impact and minimise loss of Green Belt. • The Hurcott ADR site has good road access, is isolated from other Greenfield reducing cultivation capacity and would have less environmental impact • developers' profit margins are not a factor
	LPPO4002	Extended Lea Castle	Support	Develop the Lea Castle as a small 'village' and Sion Hill school sites both currently not used
	LPPO4005	Extended Lea Castle	Support	Lea Castle is a better option commercially with all necessary utilities remaining from its previous use as a hospital. The land area is trust with two point access to free flowing roads.
	LPPO4169	Alternatives	Comment	Alternative sites for development: Area of land next to All Saints Church Wribbenhall, The land area off the B4195 Bewdley to Stourport Road opposite Cooks nursery, The field on the left coming from the roundabout into Bewdley. The area of land between New Road and the old Heath Hotel. The land opposite the Bewdley Leisure Centre is ideal the field between Blackstone Car Park and Leisure Centre. Park Lane in Kidderminster, conversion of redundant buildings at the bottom of Park Lane near to Matalan and the old Jewson Builders supply yard the old Riverboat buildings in Blackwell Street all need to be considered.
	LPPO4197	Paragraph 6.57	Comment	As stated before there are enough Brownfield sites to build a sufficient number of houses, before looking at Greenfield sites.

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	LPPO3439	Alternatives	Object	I cannot see why the council feels the need to develop the outskirts of Kidderminster when there us plenty of available space already vacant within the town centre. There are several empty premises that could be turned in to flats and where the infrastructure would not need to be extended.
	LPPO3446	Extended Lea Castle	Support	The former Lea Castle Hospital brownfield site should be utilised first and foremost as the site already has good access and existing utility supplies. Incorporate a two-form school, (2,000-2,500) houses, also a bus service and would support Cookley Parish.
	LPPO4058	Alternative suggestions	Comment	An element of building could be considered in all four corners of Wolverhampton/Wolverley and Park Gate Roads. We realise that this farmland also produces food year in year but the fields are surrounded by pollution. We also concur with the advantages of the OCAg's proposals. The fields at the rear of Ferndale is farmed but it is not extending building towards the West Midlands and should sadly be considered before any development to the east of Kidderminster. The Horsefair: we are unable to understand why the shops/houses in Blackwell Street, are still allowed to be occupied. A compulsory purchase order should become effective and the buildings demolished and the road extensively widened. 'The Peacock' is unworthy of 'listed' status and should be reviewed – resolution of daily congestion requires priority. It is an eyesore for everyone who passed thorough. Could a compulsory purchase order on Crown House be a consideration? An apartment block, with underground and/or ground and first floor security parking,

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				<p>could replace this neglected building.</p> <p>Are the derelict factory buildings all taking part in the review?</p> <p>If there must be building on the Offmore site – maybe Munro Close and Rosetti Close could become a crescent with the building of complex bungalows only – bus stop and show near by.</p> <p>Future building of shops and industrial units must consider energy efficiency.</p> <p>Community care in all its aspects through to hospitals. A major consideration to be taken on board.</p>
	LPPO3473	Selba Drive	Object	<p>When the properties in Selba Drive were built this piece of land was left as is was deemed unsuitable due to difficult drainage . The land was gifted to the Council on condition they cleared it and maintained it for the use of the children on Habberley Estate to play on, also for other recreational pursuits including picnics, exercising dogs, ball games.</p> <p>This area is safe, away from traffic and well used by children. Dog walkers also use this space on a regular basis. It is used by lots of people from the estate for leisure activities.</p> <p>Kidderminster is beginning to become a concrete jungle! We have noted that expensive houses are springing up all over the place, and now there appears to be a panic to build more community builds. May I suggest you use the land of the now derelict Lea Castle Hospital, which would make a lovely new estate for this purpose, and meet the quantity demanded of the government, and leave Selba Drive and others in the area alone. Lea Castle has the capacity to build 800 houses or more, and as it is land that has been built on, more suitable than squeezing in a</p>

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				few houses here and there.
	LPPO3978	Extended Lea Castle	Object	I would suggest as an alternative to building around Offmore & Comberton, a bigger site at Lea Castle. The Plan currently proposes using some of this land in both Option A and B but I would suggest combining the land under both options and then extending the site to include land up to the Wolverhampton Road and at the rear of Lea Castle up to Axborough Lane. There might also be a possibility of further development on the western side of Wolverley Road towards Sion Hill, which would link with development at the Sion Hill School site. With this proposed land, including the sites in that vicinity already included in the Plan, a sustainable community of around 2,000-2,500 houses could be created. This would be large enough to support a 2 form entry primary school within the catchment of Wolverley High School (thus positively impacting on the school's long term viability) and a sustainable bus service. It would also support a 'village' centre within the Cookley Parish without putting a burden on that community and would potentially be able to support live-work units.
	LPPO4804	Extended Lea Castle	Support	The land around Lea Castle could be more utilised to fill the complete area bordered by the A449, B4189, A451 and Axborough Lane. The field to the west and adjacent to the A449 could also be considered with suitable separation from local housing. The development could form a new village.
	LPPO4805	Alternatives	Support	The retail land in the town centre (the Forest Glades site, old indoor market, old court house, old Woolworth building etc) should be developed in its entirety for affordable housing and accommodation for the elderly, to help regenerate the centre and remove the dereliction.
	LPPO4808	Alternatives	Comment	The villages within Wyre Forest could be expanded to accept some of the new developments and relieve some of the pressure to use the Green Belt around the towns. This could help revitalise the villages and help their retail premises, age balance and school viability.

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	LPPO4801	Extended Lea Castle	Support	<p>There is a perfectly viable alternative at the Lea Castle site.</p> <p>I fully support a sustainable village at Lea Castle as I see it as a solution to all the problems development brings with the necessary infrastructure that is required to go with it.</p> <p>As I understand it you are responsible for maintaining protection of the environment and for the selection of the planning sites for the 5,400 homes in the Wyre Forest that are demanded by the government. This can surely be achieved by development of Lea Castle site proposed as an alternative by the OCAG.LP.</p> <p>The Lea Castle site is also an opportunity to preserve the existing wildlife habitats and sites of scientific interest around Offmore and Baldwin Road.</p>
	LPPO5080	Alternatives	Comment	<p>In the town centre there are so many large premises empty - the eyesore which is Crown House, and derelict Worcester street etc. With imagination and planning the town could be revitalised and used productively. The old courts, the Brintons building by the Town Hall for example are crying out for redevelopment and a second wind of growth. With so much more online business it is clear that not only in Kidderminster but nationwide, retail business will never be the same as it was 30 years ago. Scant recognition of these observations is made in the plan. Retail businesses should be downsized to reflect future demand, and the historical heritage buildings should be sympathetically developed, and there should be living accommodation built centrally based. I'm confident that if flats/small affordable housing was to be built on central town sites it would attract young professionals and entrepreneurs. The town centre would become vibrant again, with more leisure, restaurants, and tourist attractions centrally based.</p>
	LPPO5011	6.57	Comment	<p>Rather than encroach upon our countryside we urge the council to develop and regenerate town centre sites including unused shop premises which should be</p>

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				considered as a priority in all three Wyre Forest towns. There is the land adjacent to Tesco Stourport that has already been passed for housing and the land where Wyre Forest Golf was. It has also been brought to our attention that there is some land (No mans land and not owned by anyone) between Kidderminster and Wolverley B4190.
	LPPO5066	Lea Castle	Comment	I understand housing has to be built for the future, but would it not be possible to use somewhere like Lea Castle Hospital grounds and use some of the facilities already there, for instance existing roads existing drainage and good access from both the Wolverhampton and Stourbridge roads
	LPPO5067	6.57 Alternatives	Comment	<p>1. The Council need to build on brownfield sites and not greenfield, within the Kidderminster area.</p> <p>2. The Town Centre has developmental potential, Bromsgrove Street, Worcester Street, knock down the old Post Office building and build small apartment block, develop the old Sladen site and Sion Hill sites. Consider building in Blakedown on any brownfield sites.</p>
	LPPO5083	6.57 Alternatives	Comment	<p>The aim surely should be to create better existing neighbourhoods of affordable housing for mixed income families and newcomers and not just to boost housing numbers ad hoc. Surely it would be better for Kidderminster to regenerate areas around the district where public transport systems are already established reducing car journeys for example, local businesses can prosper and new businesses see a value in setting up in the area.</p> <p>Derelict buildings such as those on Park Street have remained an eyesore for all the years we have lived in Kidderminster (27). Surely some form of housing development could be considered to improve this area of town and other brownfield/derelict sites in the district to help say first time buyers and perhaps also the towns hard-pressed businesses.</p>

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	LPPO5009	6.57 Alternatives	Comment	Kidderminster Town Centre is dead, it needs regeneration and would be more suited to future generations consequently. There are a number of large buildings, such as Woolworths, which have sat empty for far too many years, that could be refurbished into plush apartments - surely this would be a more satisfactory solution? I would whole heartedly support the regeneration option.
	LPPO4894	6.57 Alternatives	Comment	<p>There are a number of buildings in Kidderminster town centre, some of them previously used as part of the carpet industry, which would lend themselves to conversion to apartments suiting both the young and the old. The Glades site should only have planning permission for residential use. Kidderminster town centre is crying out for improvement and regeneration if new businesses and economically active people are to be attracted to the area. The council should be giving incentives to developers prepared to improve and provide housing in the heart of the district, rather than the easy option of allowing Green Belt sites to be developed.</p> <p>There should also be a concentration on the development of the brownfield sites that still exist, along with the sites already granted planning permission that haven't been developed as yet, and also more effort to bring the 1,404 vacant dwellings identified in the Objective Assessment of Housing Need back into use.</p> <p>Core sites in Kidderminster proposed for allocation. The potential for 510 dwellings are identified in this list, along with some developments for mixed use, ie. housing and employment. So the potential is for far more than this figure. Also, 24.36 hectares are allocated for employment use, 15.51 hectares for housing. If the primary need in the area is for housing why not reallocate some of the land to housing rather than employment, given there are so many industrial units vacant and able to be used for industrial or office space.</p>

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	LPPO4902	6.57 Alternatives	Comment	<p>Areas which should be utilised first are as follows:-</p> <p>Lea Castle site, ideal for large housing estate with good existing road access</p> <ul style="list-style-type: none"> • Sion Hill School site, an absolute eyesore and magnet for criminal behaviour at present, ripe for development. Easy access to junior school, on bus route and within walking distance of High School. • Sladen School site, ideal for low cost housing for those without own transport as within walking distance of town centre and has local convenience shops even nearer. • Old Market building should be utilised in some way, either converted or demolished and built on. • Old Leisure Centre site should not be a cinema, should again be low cost housing for those without own transport as actually in town and close to Health Centre. If a cinema is desired by the Council why not in one of the empty shops in the town centre. Might hopefully bring some life to the town. • Old cricket ground at bottom of Chester Road South, again has good road access. • Old warehouse adjacent to Matalan could be turned into flats with car park on ground floor for residents. <p>All these sites and others, should be utilised first before even considering ravaging our Green Belt.</p>
	LPPO4903	6.57 Alternatives	Comment	<p>Every attempt should be made to build on the known Brownfield sites, Lea castle; Sladen School, Sion Hill thus spreading the impact on traffic density. There are many more available sites in Kidderminster and surrounding areas that should be developed first.</p>

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				<p>There are large areas next to the New Leisure Centre that are lying vacant at the moment.</p> <p>The ex leisure centre site could be built on with affordable housing instead of a cinema, put that on the site of the burnt down building next to Iceland and near the Library. This would bring a bit of life back into the centre of the town, rather than on the fringes as the leisure centre site is.</p> <p>More effort needs to be put into reviving the town centre instead of unneeded housing. The local population has remained fairly static, where is the need for 600 houses? Unless we are to become an over spill town for Birmingham!!</p>
	LPPO5104	Alternatives	Comment	<p>The resultant requirement of around 3600 dwellings should be built on the identified brownfield sites in the Plan; on the previously developed land in the Green Belt; and on the whole of the Lea Castle site.</p> <p>Expand the scope of the Plan to include Blakedown, Wolverley and Chaddesley Corbett.</p>
	LPPO4841	6.57 Alternatives	Comment	<p>The 'either/or' question is constraining without reason. It strikes me that development at the Lea Castle Hospital and adjoining areas could answer pressures on the infrastructure. This would include parts of Options A and B and the red core with what appears to be relatively easy access to major roads. I would be concerned about the intensity of this concentrated development without detailed analysis of its impact on the environment, infrastructure and traffic congestion. Again I am not convinced that there is a need for the extent of this development within the Wyre Forest District.</p>
	LPPO5114	6.57	Comment	<p>Please reconsider with thoughts of a realist rather than an idealist. Many people commuting to Birmingham and Worcester desire to live in the country and you should work on a plan to build more villages on some green field sites outside</p>

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Company / Organisation	ID	Part of Document	Type of Response-	Summary of Response
				<p>Kidderminster to give people this option. This would disperse the concentration of people entering an already grid locked system.</p> <p>Younger people prefer to live nearer town centres so housing should be provided close to or in the town centre where there is a wealth of entertainment and recreation and this could help revitalise the area. Young people do not tend to want to live on housing estates far away from all the amenities which is what you suggest in the easier option A.</p>
	LPPO4925	6.57 Alternatives	Comment	<p>Maximise the use of brownfield land in Wyre Forest. There are so many unused buildings in the area, including Kidderminster town centre, which is totally under used and feels almost derelict. The development of the old Glades site should be used for housing rather than a cinema. If the empty town centre sites were developed for housing then this may give renewed life to the centre and provide more people who would rely on the central and local businesses. New houses will be unaffordable for younger people and young families. Not all home-owners require houses and back gardens. Flats near to facilities can be a great starter home and a stepping stone onto the property ladder for younger residents. They can also provide homes for the older generation who are unable to use their own transport to travel into the town centre. The Council should also concentrate on developing on Lea Castle and making it a viable village. This can also provide housing and a community in one area without having to develop on greenfield sites and take away good farming land.</p>
	LPPO4940	6.57 Alternatives	Comment	<p>There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster.</p>

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO PARAGRAPH 6.57

Company / Organisation	ID	Part of Document	Type of Response-	Summary of Response
				I strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.
	LPPO5145	Alternatives	Comment	Referred to the Horsefair and building 300 new homes - suggested this as a more appropriate site, especially with the regeneration of Kidderminster Town and its railway station ideal for commuting.
	LPPO4848	6.57 Alternatives	Comment	Has Kidderminster Town Centre been properly considered? Town centres all over the country are dying because of changes in the way we live and purchase goods. In any case Kidderminster is well served with two modern shopping areas, Weavers Wharf and Carpet Trades, leaving much of the original town centre a shabby run down area, comprising charity shops, pop-up shops and the ubiquitous mobile phone stores, which no amount of dressing up will improve. Why not creatively re-design the town centre and rebuild it as an innovative 21st century example of a vibrant and exciting urban living area. This will be a more expensive option than building houses on fields, but if developed properly would be held up as an example throughout the UK, putting Kidderminster well and truly on the map.
	LPPO4886	6.57 Alternatives	Comment	31.1 states “there is insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the necessary housing and employment growth required in the plan period.” I would counter that: <ul style="list-style-type: none"> • There are brownfield sites that are not even on the plan, for example Brown Westhead Park in Wolverley (former army hospital with WWII buildings all over it, partially owned by the Council and with limited economic benefit to the area; and the site of the old quarry on the opposite side of the B4189 to the above site. There is brownfield land still not built on behind The Range at Crossley Park in Kidderminster.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO PARAGRAPH 6.57

Company / Organisation	ID	Part of Document	Type of Response-	Summary of Response
				I also strongly suggest that you consider other brownfield sites such those I have outlined in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.
	LPPO4799	6.57 Extended Lea Castle	Comment	There is a more viable option available at the former Lea Castle Hospital site which does form part of the plan review but also lends itself to even more capacity by extending that site to include land bordering the A449 Wolverhampton Road and Axborough Lane. This option would create a sustainable village community whilst at the same time provide the capacity needed for future housing quotas. It is an existing brownfield site with very large potential and has capacity to include local shop/public house, GP surgery, school and the like. Giving it a sustainable village model that will not have a great impact upon the surrounding or immediate locality
	LPPO5133	Alternatives	Comment	Reduce the number of empty properties by charging their owners extra council tax giving them a deadline date for when charging to start. Suggest buildings are adapted to living in, or indoor market.
	LPPO4910	6.57 Extended Lea Castle	Comment	Support Lea Castle site for the following reasons: <ul style="list-style-type: none"> • A sustainable community could inc 2,000-2,500 (include affordable) houses with schools, shops and community/social support • Easy direct access to major roads yo minimise congestion.
	LPPO5130	6.57	Comment	A 'ready made' site at Lea Castle – so use it.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 7: STRATEGIC GREEN BELT REVIEW

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	LPP0695	Policy 7	Comment	<u>Policy 7 and 31</u> — We agree with the notion that the Green Belt has not been reviewed, in WFDC since the 1970s and note WFDC acknowledges that previously developed land alone will not be sufficient to meet the growth requirements of the district. This policy draft states that the Spatial Strategy seeks to minimise impact on the Green Belt. Minimal impact would be better achieved as discussed above, by removing a larger volume of smaller sites across the district rather than a smaller number of large sites which will have greater impact. This would better contain development and prevent urban sprawl in larger volumes in more limited areas which is in conflict with the requirements of the Green Belt as outlined in the NPPF	Comments are noted. However, we have to ensure the allocation of sites are in sustainable locations. The allocation of large extension sites enables services to be provided on site if sufficient local services are not available nearby. The Sustainability Appraisal sets out the alternative options that have been considered.
Homes England	LPP0804	Policy 7	Comment	Policy proposes amendments to the Green Belt boundaries to enable sustainable urban extensions around Kidderminster. The HCA supports the proposals to removal of the Lea Castle Hospital site from the Green Belt. Whilst this is a previously developed site within the Green Belt, it is considered to be logical to amend the boundary at this location, removing the site from the Green Belt to enable its re-development.	Support of Lea Castle site redevelopment is noted.
Kidderminster Harriers Football Club	LPP0935	Policy 7	Comment	<ul style="list-style-type: none"> • First paragraph - See comments (in relation to Policy 25) and the incompatibility with NPPF. • Amend paragraph 3: In accordance with paragraph 82-83 of the National Planning Policy Framework. (NPPF Para 82 refers to the creation of new Green Belt) 	Agree with suggested changes to paragraph 3. The Kidderminster Harriers proposed relocation site will need further consideration as the emerging Local Plan progresses.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 7: STRATEGIC GREEN BELT REVIEW

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<ul style="list-style-type: none"> To provide clarity to the plan - amend paragraph 3 to make clear that the review of the Green Belt is to exclude land from it, rather than expand Green Belt in these locations. To provide clarity to the plan and support for the new sports facility in this location. Add to bullet 2: Minor changes to the Green Belt boundary will also be made at southern Kidderminster to allow the development of a centre of sporting excellence including sports facilities and related development, Stourport on Severn and Bewdley to enable local development needs to be met most sustainably and economically. 	
Worcestershire Wildlife Trust	LPPO1054	Policy 7	Comment	This policy seems to offer an appropriate way forward though we reiterate our position that the Green Belt release to the east of Kidderminster should be more limited than that proposed by Option A. In this regard we note that Option B has a reduced impact on Green Belt (by area) which is welcome and would be broadly in line with the Government's stated position on Green Belt release.	Comments are noted.
National Farmers Union West Midlands Region	LPPO1118	Policy 7	Comment	We welcome the support for affordable housing on rural exception sites in the Green Belt. This policy should also make a specific reference to the need for agricultural and diversified businesses to develop within the Green Belt. Even if the support for businesses in these areas is implied elsewhere within	Support and comments are noted. The NPPF para 89 already provides an exception in Green Belt Policy for the construction of agricultural buildings as follows:

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 7: STRATEGIC GREEN BELT REVIEW

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				the document, it ought to be more stridently expressed within this section of the plan. We would like to see a can do attitude to development that recognises that farming businesses have an essential role in maintaining the local landscape by grazing livestock, maintaining hedgerows and participating in agri-environment schemes.	"A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are: Buildings for agricultural and forestry."
Wolverley & Cookley Parish Council	LPPO1152	Policy 7 - ADRs	Comment	The three Areas of Development Restraint (ADRs) in the Wolverley & Cookley Parish (Land off Hayes Road, Wolverley, Land off Lowe Lane, Wolverley and Land off Kimberlee Avenue, Cookley) should be retained and safeguarded and not be used for Housing Development.	Comments are noted.
Taylor Wimpey West Midlands	LPPO1498	Policy 7	Comment	<p>Releasing land from the Green Belt to deliver sustainable growth, are endorsed</p> <p>Kidderminster most sustainable location for growth is enveloped by Green Belt. Brownfield sites are diminishing or difficult to bring forward for development. Green Belt release is necessary to support sustainable growth and to ensure identified issues and objectives are met within the plan period.</p> <p>Land at Rectory Lane, Areley Kings is not within the Green Belt and should be prioritised as an allocation through the Local Plan Review.</p> <p>Do not support the approach set out in respect of</p>	<p>Comments are noted.</p> <p>As per NPPF para 89, there will be 'safeguarded' sites allocated which will enable future development to come forward if required at the next Local Plan Review.</p> <p>The Sustainability Appraisal (SA) sets out the alternative options for development.</p>

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 7: STRATEGIC GREEN BELT REVIEW

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>Areas of Development Restraint within the District.</p> <p>Local Plan needs to consider future development needs within the District beyond the proposed Plan period (2034). NPPF paragraph 85 states that ‘safeguarded land’ should be identified in order to meet longer term development needs stretching well beyond the plan period</p> <p>In determining the appropriate quantum of safeguarded land to identify within Wyre Forest District it is necessary to consider the local context, including: the opportunities for meeting longer term development needs outside of the Green Belt beyond the plan period; and, the likely level of future housing and employment that will be required to meet the needs of the District beyond the plan period including cross boundary pressures.</p> <p>In the longer-term Kidderminster will need to retain a key role in providing new homes to meet the objectively assessed housing needs of the District, including identified needs for affordable homes. Necessary to release land from the Green Belt in the longer term to ensure future needs can be met and the vitality of services and facilities can be maximised in the longer term.</p> <p>In addition, the supporting settlement of Stourport-on-Severn will also retain a key role in providing new</p>	

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				<p>homes to meet the objectively assessed housing needs of the District, including identified needs for affordable homes.</p> <p>Whilst the draft Local Plan proposes to roll forward safeguarded land at Stourport on-Severn and a number of villages, this level and location of provision is ineffective in ensuring long term development needs can be met and Green Belt boundaries will endure in the long term.</p> <p>To ensure Kidderminster continues to play an important role in meeting longer term housing needs and to ensure an enduring Green Belt boundary beyond the plan period, safeguarded land should be identified around Kidderminster within this Local Plan.</p>	
Stanmore Properties Ltd	LPP01511	Policy 7	Comment	Strategic Green Belt review is necessary having regard to the amount of housing required. The more detailed Second Stage Green Belt Study (AMEC 2017) is welcomed.	Comments are noted.
Persimmon Homes Limited	LPP01595	Policy 7	Comment	Need to consider the extent of need in the District and that the right locations for growth have been selected so can make an informed assessment of how much Green Belt land release is required. Failure to do so will result in an unsound strategy which does not balance the need for housing with the appropriate quantum of housing sites.	Comments and support for the Catchems Ends site are noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>Green Belt boundaries should only be amended in exceptional circumstances, through the preparation of the Local Plan (Para 83 NPPF) The Council recognises that exceptional circumstances are justified through the need to facilitate the development that is needed and promote sustainable patterns of development.</p> <p>Locations for growth that are integrated into the built form of the town of Bewdley should be looked at that provide a reasonable prospect for housing. Development to the north, south and west of the town should be limited due to topography which would give rise to prominent developments with significant landscape impacts. Land at Catchems End is an appropriate location for Green Belt release however, as identified in response to the Council’s Development Options, RPS considers that the Council needs to provide more certainty that this site can come forward, further to release from the Green Belt.</p> <p>Greater consideration should be given to land to the east of the town, south of existing development at Catchems End. This land is of a lower landscape value and could be developed in a way to integrate with the existing development and enhance the sustainability of the area. It is considered that this release would be necessary in order to meet the requirements of the strategy under the test of exceptional circumstances, expressed in paragraph 83 of the NPPF.</p>	

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 7: STRATEGIC GREEN BELT REVIEW

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response						
				<p>The Wyre Forest Green Belt Review Part II Site Analysis (2017) reviews Catchems End (referred to as site WA/BE/3) against to 5 principles of the Green Belt identified in Paragraph 80 of the NPPF. The Council’s assessment indicates is that the site makes a significant contribution towards three of the five Green Belt purposes. RPS does not agree with the Council’s evidence and considers that the analysis of the site is flawed and that amendments should be made as set out in the table below.</p> <table border="1" data-bbox="893 699 1559 1353"> <thead> <tr> <th data-bbox="893 699 1111 778">Green Belt Purpose</th> <th data-bbox="1111 699 1339 778">Council Analysis</th> <th data-bbox="1339 699 1559 778">RPS Analysis</th> </tr> </thead> <tbody> <tr> <td data-bbox="893 778 1111 1353">To check the unrestricted sprawl of large built-up areas</td> <td data-bbox="1111 778 1339 1353">Contribution Whilst the site is relatively small and well bounded, it does make a contribution to preventing local sprawl along the Kidderminster Road and the A456.</td> <td data-bbox="1339 778 1559 1353">Limited Contribution The site is well bounded by the west midlands safari park, Bewdley and Wribbenhall and does not contribute towards preventing local sprawl as the site is surrounded by other uses.</td> </tr> </tbody> </table>	Green Belt Purpose	Council Analysis	RPS Analysis	To check the unrestricted sprawl of large built-up areas	Contribution Whilst the site is relatively small and well bounded, it does make a contribution to preventing local sprawl along the Kidderminster Road and the A456.	Limited Contribution The site is well bounded by the west midlands safari park, Bewdley and Wribbenhall and does not contribute towards preventing local sprawl as the site is surrounded by other uses.	
Green Belt Purpose	Council Analysis	RPS Analysis									
To check the unrestricted sprawl of large built-up areas	Contribution Whilst the site is relatively small and well bounded, it does make a contribution to preventing local sprawl along the Kidderminster Road and the A456.	Limited Contribution The site is well bounded by the west midlands safari park, Bewdley and Wribbenhall and does not contribute towards preventing local sprawl as the site is surrounded by other uses.									

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				<p>To prevent neighbouring towns merging into one another</p>	<p>Significant Contribution The site is part of land which separates Bewdley, Kidderminster and Stourport and is judged to make a significant contribution to this purpose, albeit bounded by the A456.</p>	<p>Limited Contribution The site does not contribute to separating the settlements as the West Midlands Safari park lies between the site and Kidderminster with Wribbenhall to the south which separates the settlement from Stourport.</p>	
				<p>To assist in safeguarding the countryside from encroachment</p>	<p>Contribution The site is contained on its northern and southern sides, although the western boundary is less clear.</p>	<p>Limited Contribution The site is well contained on all sides with the West Midlands Safari Park to the west.</p>	
				<p>To preserve the setting and special character of historic towns</p>	<p>Significant Contribution As part of the north eastern gateway</p>	<p>Limited Contribution The site does not contribute to the</p>	

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					into Bewdley, the site makes a significant contribution, although there is no visual connection with the heart of the town.	historic setting of Bewdley with very little in the way of historic assets within the area. There is no connection between the historic centre of Bewdley and the location of the site. The open space will also enhance the historic setting of a small number of listed buildings within the area.	
				Overall Assessment of Contribution to Green Belt Purposes	Significant Contribution Overall, and cumulatively, the site makes a significant contribution to Green Belt purposes because of its role as part of the wider tract	Limited Contribution Overall the site makes a limited contribution towards the Green Belt as it is well bounded by existing uses around the site. Namely, the	

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 7: STRATEGIC GREEN BELT REVIEW

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				<table border="1" data-bbox="898 300 1554 1026"> <tr> <td data-bbox="898 300 1111 1026">of land separating Bewdley, Stourport and Kidderminster, its role as part of the gateway to Bewdley, a role in preventing wider encroachment and sprawl. Development would reduce openness by bringing the edge of Bewdley south eastwards to meet the A456, although this would act as a long-term edge.</td> <td data-bbox="1111 300 1339 1026">West Midlands Safari Park to the west and Wribbenhall to the south. This ensures that the site does not contribute towards restricted urban sprawl, restricting development in the countryside and the separation with Stourport or Kidderminster.</td> </tr> </table> <p data-bbox="898 1026 1554 1396">Land at Catchems End can be released from the Green Belt without undermining the functions of the Green Belt and its role in preventing urban sprawl. The site is located adjacent to the A456, currently screened from the road by an unbroken hedgerow, interspersed with trees. Though this site is currently within the Green Belt, it does not fulfil the current functions of the Green Belt and could be released without giving rise to significant effects or risk of setting precedent. It</p>	of land separating Bewdley, Stourport and Kidderminster, its role as part of the gateway to Bewdley, a role in preventing wider encroachment and sprawl. Development would reduce openness by bringing the edge of Bewdley south eastwards to meet the A456, although this would act as a long-term edge.	West Midlands Safari Park to the west and Wribbenhall to the south. This ensures that the site does not contribute towards restricted urban sprawl, restricting development in the countryside and the separation with Stourport or Kidderminster.	
of land separating Bewdley, Stourport and Kidderminster, its role as part of the gateway to Bewdley, a role in preventing wider encroachment and sprawl. Development would reduce openness by bringing the edge of Bewdley south eastwards to meet the A456, although this would act as a long-term edge.	West Midlands Safari Park to the west and Wribbenhall to the south. This ensures that the site does not contribute towards restricted urban sprawl, restricting development in the countryside and the separation with Stourport or Kidderminster.						

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 7: STRATEGIC GREEN BELT REVIEW

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				is considered that Land at Kidderminster Road represents a realistic site for delivery and should be included within the Local Plan as a site for Green Belt release.	
Wyre Forest Community Housing	LPP01651	Policy 7	Comment	Given the lack of otherwise identified sites in the Fairfield and Wolverley areas, we do not support Hayes Road being given ADR status. Rather, we would want to see Hayes Road treated as an exception site, which would enable the site to be more fully developed as an affordable housing scheme.	The Hayes Road site was allocated as an ADR site in a previously adopted Local Plan.
	LPP02316	Cookley Green Belt	Comment	<p>"Insetting" and "washed over" status of villages will be retained although village envelopes will be revisited to allow for development to meet local needs." How is a development of 1200 – 1400 homes joining Cookley to Broadwaters, in any way a development that meets the needs of Cookley as a village. Our village envelope will be stretched to Kidderminster and our Green Belt will be decimated.</p> <p>Cookley is referred to as Inset Green Belt. How will Cookley be Inset Green Belt when the southern Green Belt is completely removed? Your intention is to join Cookley to Kidderminster, therefore negating your obligation to protect Cookley as a village Inset Green Belt.</p>	Disagree. Cookley village is separate from the Lea Castle site and will remain as a separate village.
	LPP04607	Policy 7	Comment	Policy 7 states "The current approach to "insetting" and "washed over" status of specific villages will be retained although village envelopes will be revisited to	Disagree. Cookley village is separate from the Lea Castle site and will remain as a separate village.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 7: STRATEGIC GREEN BELT REVIEW

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				<p>allow for development to meet local needs.” How is a development of so many homes joining Cookley at the northern end, to Broadwaters, Kidderminster at the southern end, in any way a development that meets the needs of Cookley as a village. Our village envelope will be stretched to Kidderminster and our Green Belt will be decimated.</p> <p>In the table on page 29, Cookley is referred to as Inset Green Belt. How will Cookley be Inset Green Belt when our southern Green Belt is completely removed? I would infer from this that your intention is to join Cookley to Kidderminster, therefore negating your obligation to protect Cookley as a village Inset Green Belt.</p> <p>Cookley is a Village INSET in Green Belt. It has its own strong identity and provides key local services. As a council WFDC should be supporting Wolverley and Cookley Parish Council to meet it’s local needs in a sustainable way and not by destroying our Green Belt and putting a development larger than our village, and forming a development large enough to join Cookley to Kidderminster.</p>	
	LPPO655	Green Belt	Object	<p>I object to the concept of development in any Green Belt land. When population is clearly out of control, the idea of just building to solve the problem is short sighted. If this is the plan for the near future, then what about beyond? Will more Green Belt be taken to answer the problem then, until there is not green</p>	<p>Objections noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our</p>

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 7: STRATEGIC GREEN BELT REVIEW

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				space at all?	<p>housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>Future Local Plans may also require Green Belt release if the housing need cannot be accommodated on land not in the Green Belt.</p>
	LPP0661	Cookley ADR	Object	<p>Object to development of this land is due to the fact that Cookley will lose its village identity and end up as a Kidderminster extension. This will not be feasible due to:</p> <ul style="list-style-type: none"> • Recent modernisation of school will not accommodate more than 600 houses in the area. • This area is Green Belt and priority should be redevelopment of brown belt of which there are several around Kidderminster. • Increase in traffic in and around our quiet village • - I do not have any objection to development of red Lea Castle site as this 	<p>Objection is noted. The ADR sites listed in Policy 7 are already allocated as ADR sites in the current adopted Local Plan.</p>

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				is brown field.	
Hagley Parish Council	LPP0776	Policy 7	Object	Green Belt Review - NPPF says that the Green Belt Boundaries should only be reviewed in “exceptional circumstances”, which it does not explain further. The Housing White Paper, which is presumably relevant as emerging government policy, indicates that this means boundaries should be changed only when all other options have been considered. In other words, changing Green Belt Boundaries should be a last resort. Neither the Consultation Document nor any of the background research that we have seen provides any explanation of why this last resort needs even to be considered.	<p>The NPPF in para 83 states “Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.” Wyre Forest District Council is undertaking a ‘Local Plan Review’ so this meets the requirements set out in para 83 of the NPPF.</p> <p>The Sustainability Appraisal (SA) forms part of the evidence base for the emerging Local Plan and will set out the alternative options that have been considered and why Green Belt release is necessary.</p>
Campaign to Protect Rural England	LPP0934	Policy 7	Object	<p>Current text does not make clear the 5 purposes of Green Belt.</p> <p>Green Belt boundaries can only be altered by a Local Plan Review and in exceptional circumstances. NPPG says meeting housing numbers on its own is not 'exceptional circumstances'. Housing White Paper is consulting on adding explanation that review should only be done if all other options have been considered. Plan fails to establish if this has been done. We</p>	<p>The NPPF in para 83 states “Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.” Wyre Forest District Council is undertaking a ‘Local Plan Review’ so this meets the requirements set out in para 83 of the NPPF.</p>

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				<p>challenge assumption that there is not enough housing land without using Green Belt land. Sites in Bewdley and Stourport to west of River Severn are outside of Green Belt. Option to use such sites should be explored prior to reviewing Green Belt.</p> <p>One objective of Green Belt is to stop towns coalescing. For this purpose, Cookley should be included. Concerned that release of Hurcott ADR and development of hospital site will lead to joining up of Kidderminster and Cookley and urban sprawl. However, leaving hospital site as derelict is not an option.</p>	The Sustainability Appraisal (SA) forms part of the evidence base for the emerging Local Plan and will set out the alternative options that have been considered and why Green Belt release is necessary.
Persimmon Homes Limited	LPPO1428	Policy 7	Object	<p><u>Support</u> Green Belt boundary review. <u>Object</u> to the time period used for the Green Belt review.</p> <p>In order to accommodate longer term development needs a date of 2051 should be used to assess future development needs. This timeframe will allow land to be released now which could be used for development in the next two Local Plan reviews, providing a long term Green Belt boundary whilst allowing all parties to plan positively for the future of the district as well as accommodating future overspill from the Black Country and Birmingham conurbations.</p>	The NPPF para 157 states that Local Plans should “be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.” The emerging Local Plan will be for a 20 year plan period which is typical of the time period used in most adopted Local Plans. As per NPPF para 89, there will be ‘safeguarded’ sites allocated which will enable future development to come forward if required at the next Local Plan Review.
	LPPO2313	Policy 7	Object	Policy 7 - It says it all in the opening sentence. It is therefore your job to produce a) Accurate figures and then b) Justify the reasons why Green Belt should be	Objection is noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 7: STRATEGIC GREEN BELT REVIEW

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				built on when you haven't worked hard enough to get current brownfield sites built on.	meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.
	LPPO3648	Policy 7	Object	<p>Concerned about the proposals at Wilden Top Area of Development Restraint (ADR). We would like to object to and express concern about the proposals in the LPRPO document, June 2017, to:</p> <ul style="list-style-type: none"> • Include the site as a potential site for Travelling Showpeople • Continue to include the site as an ADR for the development of housing <p>In addition to the substantial impact upon the rural and unspoilt nature of Bigbury Lane we have the following major concerns about the proposed development:</p> <p><u>B: Concerns Relating to the Continuation of the Site as an ADR</u></p> <p>B1: It is anticipated that the development of new</p>	<p>Objection and comments are noted.</p> <p>The site was allocated as an ADR site in the currently adopted Local Plan.</p> <p>The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>housing would destroy the character of the area and could detract from local heritage assets.</p> <p>It is anticipated that a housing development at the top of Bigbury Lane would not integrate effectively with its surroundings as it would destroy the rural, wooded character of the lane, substantially increase the housing density, destroy the existing layout and detract from the setting of heritage assets. Two locally listed buildings are located adjacent to the base of the site. It is anticipated that any housing development would completely destroy current design and layout and substantially increase the density of housing and would be unlikely to blend with the locally listed buildings and rural character of the lane. The ADR borders onto the fence of a private residential dwelling and, I assume, would transform the landscape adjacent to this locally listed Mock Tudor building.</p> <p>Section 11.18 of the LPRPO states that <i>“the benefits of conserving and enhancing heritage assets include: ..influencing the character of an area and giving it a sense of place”</i>. Policy 11C states that <i>“new development must protect and where possible enhance the unique character of the landscape including the individual settlement or hamlet within which it is located”</i>. Policy 11D states that development should <i>“support the conservation, enhancement and restoration of biodiversity and geodiversity across the Plan Area”</i>. It is hoped that this rationale would be</p>	

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				<p>applied to any proposed development at Wilden Top if any development is permitted.</p> <p>Section 32.3 of the LPRPO states that the <i>“land at Burlish Crossing is near the Lickhill Road North sites and would require extensive planting along the northern boundary to soften the impact of built development as viewed from the Bewdley direction”</i>. If a new housing site or site for Travelling Showpeople was approved for the Wilden Top site would the same conditions be made upon imposed on any new development?</p> <p>There are numerous references in the Baker Report detailing why the site at Wilden Top would be unsuitable as a site for Travelling Showpeople. It states that <i>“mitigation would be required to protect the character of the lane regard should be had for the footpath”</i>. I assume that most of these would also apply to any proposed housing development?</p> <p>B2.The site may not be well served by facilities.</p> <p>The Local Plan Review Preferred Options Sustainability Appraisal Report states that all of the Stourport sites <i>“score well in terms of access to services apart from the sites at Wilden Top and Sandy Lane”</i> which are not served well by facilities. Appendix G6 continues that the site scores negatively in relation to other criteria. I assume that these scorings apply both to the continuation as an ADR or a site for Travelling</p>	

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				<p>Showpeople. It is assumed that these issues could potentially make the site unsuitable for either type of development?</p> <p>Since the closure of Wilden Lane Post Office last year there is no longer a local shop to serve any new housing development. There may be issues relating to power supply and sewerage for any new development at the Wilden Top ADR. I am concerned that any new housing development would further exacerbate the frequent interruptions to the electricity supply experienced by residents of Bigbury Lane. The sewers in this area are narrower than modern sewers and thus more prone to blockage. I don't know whether or not this would affect any housing development further up the hill.</p> <p><u>C: Concerns Relating to Both Proposals</u></p> <p>As far as I am aware , unlike the other sites included in the LPRPO it does not include an indicative number of dwellings for the ADR at Wilden Top or for the number of pitches proposed for a site for Travelling Showpeople, which makes it difficult to comment on the scale of the impact of the proposals. The number of dwellings or pitches proposed would obviously affect the scale of the impact of any development on the local area. Is it possible to provide this information? The Baker Report, Appendix 4, 2011, states that availability of the site "is currently unknown" - I assume</p>	

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				<p>that this is still the case as there appear to be no references in the document to the owners wishing to sell/ make available the land.</p> <p>The Planning Team should walk around the site before proceeding any further with this proposal as, in light of the points above, we cannot understand why this site is being considered as a potential site for Travelling Showpeople or retained as an ADR.</p> <p>C1. Any additional pedestrian footfall must substantially increase the risks to pedestrian safety on Bigbury Lane due to the narrowness of some sections of the lane and absence of a footpath along the majority of the lane. These risks would also be substantially increased by wide vehicles attempting to pass pedestrians on narrow sections of the lane where there is no footpath.</p> <p>Bigbury Lane is a narrow lane and is not suitable for any additional pedestrian traffic. One section is particularly narrow and bendy and is located on a hill, which can encourage traffic travelling downhill to gather speed. The creation of either a housing site (or a site for Travelling Showpeople) could potentially result in increased pedestrian footfall to the base of Bigbury Lane and could lead to major pedestrian/road traffic incidents. Although I imagine that any plans to create housing in the ADR at the top of Wilden Lane could include the creation of a footpath alongside such</p>	

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				<p>housing I cannot envisage how the lower section of Bigbury Lane could be made safe for pedestrians.</p> <p>Problems occur when motorists try to travel either up or down the Lane and encounter a vehicle travelling in the opposite direction. Cars often have to wait and sometimes pull onto the drive of private properties, in order to pass oncoming traffic. This can be further complicated by pedestrians trying to negotiate a safe route along the Lane, which must present a significant risk to pedestrian safety. Any increase to the footfall along this section of the Lane would, in my view, substantially increase this risk.</p> <p>At present I think most of the pedestrians from the housing estate at the top of the hill travel down Bigbury Lane.</p> <p>It has been suggested by a Local Councillor that some of the residents of the housing estate at the top of the hill, use Wilden Top Lane to access Hartlebury Road or use the public footpath that leads to the community centre to access Wilden Lane. I have visited this footpath and would like to invite other representatives of WFDC to do the same. The path includes several sections which have a very steep gradient, one section has many steps which would not be accessible for anyone using a buggy or pushchair or for many older people. Therefore I believe that existing and additional pedestrians are most likely to use Bigbury Lane to</p>	

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				<p>access Wilden Lane. Some residents will not feel safe using an off road public footpath especially in the dark whereas Bigbury Lane has street lights. The top section of Hillary Road and majority of Wilden Top Lane do not have streetlights which, I expect, would encourage further pedestrian footfall along Bigbury Lane from any new development at Wilden Top when it is the dark.</p> <p>I think many people will understandably have to weigh up the risks between walking down an isolated footpath (with a steep gradient but with no traffic) to walking down a busy narrow lane with no footpath.</p> <p>Bigbury Lane is also frequently used by horse riders, which can add to the risk from traffic and pedestrians trying to pass in narrow sections of the lane.</p> <p>Any significant housing development in the Wilden Top ADR, even if it included the provision of a footpath in that section of the Lane, would substantially further reduce road safety along the lower section of Bigbury Lane where there is no footpath. This is particularly important given the high volume of young families that walk down the lane to access Wilden Primary School, older children who access the bus route to Stourport High School, and workers who walk to bus routes and the main road via Wilden Lane.</p> <p>C2. Destruction of the natural environment and the impact upon local wildlife, particularly some</p>	

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				<p>protected species including the local bat population.</p> <p>It is expected that the development of any new housing would completely destroy the habitat of resident wildlife and a site for Travelling Showpeople, to a slightly lesser extent, could destroy the habitat of and displace local wildlife.</p> <p>This piece of land has been allowed to grow wild for a significant period. Any development, either a site for Travelling Showpeople or a housing development could destroy local wildlife, which may include protected species.</p> <p>The land located at Wilden Top was taken out of the Green Belt in 1989 and designated as an Area of Developmental Restraint and this designation has not been adjusted since then. However as this action was taken 18 years ago I believe that there is significant reason to review this decision.</p> <p>During the last 18 years the land in question and the surrounding land, at the top and middle of Bigbury Lane, must have matured further and I believe that the site is now home to a broad spectrum of wildlife. I believe that before any plan for housing or for the creation of a site for Travelling Showpeople is approved an independent bat survey and a full wildlife survey should be undertaken in order to assess the potential impact of any development upon the environment,</p>	

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				<p>particularly any protected species of wildlife nesting and living within this site.</p> <p>Bats have been observed frequently in the gardens of the houses immediately below the proposed site at Wilden Top. Without a thorough independent survey there is a major risk that substantially changing the nature of the Wilden Top site either as a housing development or a site for Travelling Showpeople could risk breaking the law if it causes “<i>damage or destroy a breeding or resting place</i>” or “<i>obstruct access to their resting or sheltering places</i>” .</p> <p>C3. Exacerbation of existing congestion issues in Bigbury Lane.</p> <p>Difficulties are frequently experienced in passing oncoming traffic and in parking, particularly in the middle and lower sections of Bigbury Lane. This would be made much worse by the increased volume of traffic that would accompany a new housing development but would also be exacerbated by any additional traffic, particularly wide vehicles.</p> <p>Bigbury Lane already suffers from major congestion and a lack of adequate parking spaces. There is not sufficient room for visitors to residential properties to park.</p> <p>Passing vehicles frequently have to pull over to allow</p>	

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				<p>traffic to pass, either in the stopping places or sometimes onto the edge of private driveways in order to pass oncoming vehicles, often causing tailbacks.</p> <p>Increased congestion and parking issues also increases the risks to pedestrian safety as pedestrians have to navigate between and around vehicles without a suitable footpath.</p> <p>Any additional proposed housing development must increase the number of vehicles and pedestrians using the lane exacerbate parking issues and thereby further increase the risks to pedestrian safety. Would it be responsible to propose a development at Wilden Top that would create these problems, particularly as it could pose a threat to public safety by encouraging and increasing pedestrian footfall in this steep narrow lane, mostly without a footpath, used by many families and other pedestrians to access the local school and Wilden Lane.?</p> <p><u>Conclusion</u></p> <p>In the light of the information above we would like to object to the proposals for the site at Widen Top to either create a site for Travelling Showpeople or to continue to allocate the site as an Area of Development Restraint. Due to the number and gravity of our concerns my neighbour and I would appreciate the opportunity to meet representatives of Wyre Forest</p>	

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				District Council at or adjacent to the site to discuss our concerns and how, or if, they can be addressed before any of these proposals are included in the next version of the Proposed Local Plan.	
	LPPO26	Use of Green Belt	Object	<p>Objects to use of Green Belt Land:</p> <ul style="list-style-type: none"> • The Green Belt is important as it prevents urban sprawl, the merging of towns and it safeguards the countryside • Green Belt also provides habitat, biodiversity, prime agricultural land, recreational space and it is essential to protect and promote the character of the countryside • Green Belt land should not be removed when suitable alternative sites could – and should - be used e.g. further development of the Sugar Beet site, the Lea Castle campus and city centre developments. • Any removal or reduction of Green Belt will increase the urbanization of the area with a consequent increase in traffic • Increased volumes of traffic will create congestion, exhaust and noise pollution and increase pedestrian and vehicular hazards <p>I urge you not to make use of Green Belt land for the above reasons.</p>	Objections noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.
	LPPO4049	Policy 7	Object	<i>“Green Belt boundaries should be amended only in exceptional circumstances when local authorities can</i>	The Sustainability Appraisal (SA) provides details of the alternative

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				<p><i>demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements</i>". WFDC have not met this criteria and reference two documents AMEC 2016 and AMEC 2017 which are not accessible.</p> <p>There appears to have been no discussion with Wychavon with regard to any housing development as is proposed by the White paper.</p> <p>The Green Belt changes in relation to Stourport are all to the North —West of the town and include house density building which is much higher than normal for this region. The choice of small Green Belt sites with high density building will exacerbate the already overloaded transport and education facilities in that area. No mention is made 01: use of the land south of Kingsway (Previously, also Wyre Forest Golf Club) which would provide a housing area similar to or larger than two of the proposed core sites and with access to schools and transport.</p>	<p>options that have been considered in the emerging Local Plan.</p> <p>The Green Belt Study produced by AMEC was available during the consultation period for public viewing. Copies were available to download on the Council website and hardcopies were available at the 8 drop-in sessions held throughout the District for public viewing.</p> <p>We have consulted with Wychavon District Council and continue to do so as part of our Duty-to-Cooperate requirements.</p>
	LPPO4604	Green Belt	Object	<p>On page 47, in Policy 7 it states "The current approach to "insetting" and "washed over" status of specific villages will be retained although village envelopes will be revisited to allow for development to meet local needs." How is a development of 1200 – 1400 homes joining Cookley at the northern end, to Broadwaters, Kidderminster at the southern, in any way a development that meets the needs of Cookley as a</p>	<p>Disagree. Cookley village is separate from the Lea Castle site and will remain as a separate village.</p>

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				<p>village. Our village envelope will be stretched to Kidderminster and our Green Belt will be decimated.</p> <p>Cookley is referred to as Inset Green Belt. How will Cookley be Inset Green Belt when our southern Green Belt is completely removed? I would infer from this that your intention is to join Cookley to Kidderminster, therefore negating your obligation to protect Cookley as a village Inset Green Belt.</p> <p>Cookley is a Village INSET in Green Belt. It has its own strong identity and provides key local services. As a council WFDC should be supporting Wolverley and Cookley Parish Council to meet it's local needs in a sustainable way and not by destroying our Green Belt and putting a development larger than our village, joining our village and forming a development large enough to join Cookley to Kidderminster. I am happy to see a residential development on the Lea Castle Hospital site on the brown field part of the site and without the destruction of the woodland.</p>	
	LPP04958	Cookley ADR	Object	<p>I object to the blue and sandy coloured areas being developed. The red area which is the original Lea Castle site is sustainable in size and amount of dwellings originally proposed which I believe to be 600.</p> <p>The options A&B in addition to the red area is too much for surrounding villages/areas to sustain. More definition needs to be revealed as to infrastructure</p>	<p>Objection and comments are noted. The Infrastructure Delivery Plan sets out the infrastructure plans for the Local Plan period.</p>

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				going in place, schools, GP's shops etc.	
	LPP04960	Cookley ADR	Object	I strongly object to the development of the orange, purple and blue zones in and around Lea Castle, as this will join Cookley Village a rural community to Kidderminster Town and therefore lose the village status. It is not necessary to build on as there variety of brown belt land still to be redeveloped nearer to the town centre which would meet the school, doctor, roads needed for the extra people.	Objection is noted.
Horton Estates Ltd	LPP0852	Policy 7	Support	We support the reference to development proposals in the Green Belt being assessed against relevant national planning policy. However, this policy should accord with, and cross-refer to, draft Policy 34 which permits certain forms of development at PDL sites in the Green Belt. In addition, we wish to highlight that PDL within the Green Belt could be released at Cursley Distribution Park through site rationalisation which could be allocated for residential development. This site lies within Parcel SE4 of the Strategic Green Belt Review (Strategic Analysis, Amec, September 2016) which was assessed as making a "limited contribution" to four of the five Green Belt purposes (NPPF para. 80). As described in more detail above, two areas of PDL could be released (1.5ha and 1.9ha), each of which could accommodate in the order of 40 dwellings. This would require the land to be released from the Green Belt and reflected in Policy 7.	Support for Policy 7 noted. Cross-reference to Policy 34 will be considered. Comments regarding Cursley Distribution Park site are noted.
Miller Homes	LPP0951	Policy 7	Support	Our client supports the proposal to allocate the	Comments and issues raised are noted.

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				<p>Hurcott Area of Development Restraint (ADR) (land between A451 and Hurcott Village) for residential development.</p> <p>The Preferred Options consultation document highlights that the availability of previously developed sites within the District is insufficient to accommodate the higher objectively assessed housing need (OAHN) based requirement for the District. Furthermore WFDC reporting identifies a total availability of 2,956 dwellings based on a combination of completions (April 2016-April 2017), existing and lapsed planning permissions, previously developed land (Green Belt) and previously developed land (non Green Belt) against an OAHN target of 5,400 dwellings and a Local Plan target of 6,000 dwellings. This represents shortfalls of 2,444 and 3,044 dwellings respectively. Therefore greenfield sites need to be identified and allocated to enable the residual requirement to be met.</p> <p>As identified in our client’s response to proposed Policy 6C, the Local Plan Review Preferred Options consultation document also identifies that <i>“the urban areas of the District have the greatest housing needs and are the locations where the cost of public service delivery is relatively low”</i>. The WFDC Settlement Hierarchy Technical Paper proposes that Kidderminster is classified as a Strategic Centre at the top of the District settlement hierarchy, and accordingly is</p>	<p>Agree that the ADR site has already been removed from the Green Belt, however Green Belt restrictions remain in place as it is safeguarded land.</p> <p>There are ecological issues in the southern area of this site as the ADR site backs onto an SSSI.</p>

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				<p>considered to be the most sustainable settlement in the District and the main focus for future development within the District. It is noted that this proposed settlement hierarchy formed the basis for both the current adopted Core Strategy Policy DS01 and proposed Policy 6B of the emerging Local Plan.</p> <p>It stands to reason therefore that the development need that cannot be met on previously developed land should be focussed on the settlements higher up in the settlement hierarchy, especially to greenfield sites on the edge of Kidderminster, as advocated by proposed Policy 6C of the emerging Local Plan.</p> <p>The National Planning Policy Framework (NPPF) states that local planning authorities can, where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt in order to meet longer-term development needs stretching well beyond the plan period.</p> <p>Kidderminster is surrounded by Green Belt, with the exception of one ADR, between the A451 and Hurcott Village, Kidderminster. The land within this ADR was removed from the Green Belt and designated as ADR through the Wyre Forest Urban Areas Local Plan (1989) in order to meet longer term development requirements. Whilst WFDC has been able to adopt subsequent Development Plan Documents without requiring incursions into the Green Belt or requiring</p>	

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				<p>the development of ADRs to meet development needs, the time has come for WFDC to look beyond the boundaries of its urban areas for sites to meet the District’s development needs.</p> <p>As a non Green Belt site which has already been identified for meeting longer term development needs, the ADR between the A451 and Hurcott Village presents the most logical and most sequentially preferable first option for accommodating residential development adjacent to the most sustainable settlement in the District. Moreover the development of this site reduces the amount of land required to be removed from the Green Belt through the new Local Plan to meet the District’s development needs.</p> <p>Although the site is not located within the Green Belt, this area of ADR is assessed within the WFDC Green Belt Review Part II – Site Analysis report as if it was in the Green Belt. The site is assessed in two parts. With respect to the northern area the reporting states that <i>“Development of the site would not significantly damage Green Belt function in this location”</i>. The report does also comment that the development of both the northern and southern areas would reduce the openness of these areas. The report does however continue to propose both sites for development.</p> <p>This ADR has previously been assessed in the 2009 Strategic Housing Land Availability Assessment</p>	

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				<p>(SHLAA), which reports that the SHLAA panel considered that the ADR may be suitable for housing (up to 250 dwellings) if greenfield land releases are required at the end of the Plan period. Whilst the Housing and Employment Land Availability Assessment (HELAA) identifies in principle that the site is suitable, available achievable and potentially developable after 5 years, it should be noted that this is predicated on the assumption that there is a need to remove the site from the Green Belt and our client wishes to highlight that the site is not in the Green Belt and is actually therefore deliverable within the next 5 years.</p> <p>The Sustainability Appraisal (SA) for the Preferred Options consultation document highlights the positive implications of housing coming forward on this ADR site, including with respect to affordable housing provision. Whilst the SA identifies potential issues relating to the impact of development on biodiversity and the Kidderminster road network, it is considered that these potential concerns can be alleviated or mitigated, as is already being demonstrated through the planning application submitted in outline for up to 100 dwellings (not up to 82 dwellings as stated in paragraph 31.3 of the consultation document and within the evidence base documentation) on the northern part of this ADR, which is pending determination. This planning application, submitted by a national housebuilder (our client), provides further demonstration of market confidence in this location,</p>	

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				<p>the confirmed availability of the land, and the deliverability of housing development on this site. The National Planning Policy Framework (NPPF) recognises the need to take 'market signals' into account in drawing up new development Plans.</p> <p>In terms of the location of this site, it should be noted that the site is adjacent to the north eastern edge of Kidderminster, with existing residential development along the site's western boundary. The site benefits from extensive frontage to the A451 Stourbridge Road, which is an existing bus route and has an existing pavement that can be extended up to this site. The nearby Broadwaters area contains a collection of local services and facilities. Residential development is therefore considered to be a suitable and compatible use for this site.</p> <p>In addition, extensive technical assessment has been undertaken with respect of the northern area of the ADR in relation to ecology, drainage, transport, noise, landscape, agricultural land quality, ground quality, sustainability, archaeology and trees. The site is of limited archaeological interest. The ecological features of most interest are located around the boundaries of the site, which can be retained and enhanced through residential development proposals (with the exception of the creation of access points). The site is within flood zone 1 and development can take place on the site without increasing the potential runoff from the site.</p>	

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				<p>There are limited views into this site and the impact of development on the landscape can be further reduced through enhanced boundary planting.</p> <p>Sufficient noise mitigation measures can be incorporated into the development to provide appropriate amenity and it is considered that development on this site would not cause an adverse impact on the operation of the highway network and would only have a permanent minor adverse impact on the supply of best and most versatile agricultural land.</p> <p>If the northern area of the ADR is developed first, it can be developed in a way that would not compromise the ability for the rest of the ADR to be developed at a later date. The wider ADR also offers potential for green infrastructure connectivity through to Broadwaters Park / Podmore Pool and the facilities and amenities in Broadwaters. If housing need requires further land release then there is an opportunity for additional land to come out of the Green Belt in the vicinity of this location. The allocation of the ADR for development would not be dependent on, or prejudice, a wider area being allocated, but the allocation of a wider area would provide further opportunity for creation of a critical mass and provision of additional facilities to further enhance the sustainability of this location.</p>	
Moor Park Trustees	LPP01101	Policy 7	Support	We fully support commitment to Green Belt Review through the plan preparation process. It is fully	Support and comments are noted.

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				<p>acknowledged that this will enable development to be brought forward in a number of sustainable locations that would otherwise be constrained from growth without compromising too heavily the purposes of including land within the Green Belt.</p> <p>A development of this size will clearly bring with it social and economic benefits and would be directly required to provide educational and employment sites which is an advantage over smaller developments. It is noted that any proposals would be required to take account of existing constraints.</p> <p>Removing large volumes of Green Belt in less areas would, clearly, have a greater impact than smaller sites around the district however it is considered in the case of the East of Kidderminster (N) a large scale proposal will bring additional on-site benefits for future occupiers to assist in removing pressure of existing services in the area (schools, convenience stores, employment opportunities etc.) and contribute to a sustainable form of development to assist in accommodating the housing and employment needed in the plan period.</p>	
South Worcestershire Authorities	LPP01250	Four Acres Caravan Park ADR	Support	The SWCs welcome that the ADR site continues to be safeguarded during the plan period.	Comments are noted.
Gladman Developments Limited	LPP01347	Policy 7	Support	Gladman support the Council's commitment to Green Belt Review through its plan preparation process. This will allow for sites to be brought forward for	Support for Policy 7 and comments are noted.

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				<p>development alongside settlements that may otherwise be significantly constrained from growth. The approach to identifying locations for growth should also fully consider how sustainable development options can be brought forward through the Local Plan to meet the needs of settlements in locations that are not constrained by the Green Belt in reaching a decision on the circumstances relevant to the removal of land from Green Belt.</p> <p>Gladman welcome that the Green Belt Review acknowledges that the development needs of the area will need to be balanced against other factors, which together could constitute ‘exceptional circumstances’ meriting the removal of the Green Belt designation from areas of land to allow for development. Further consideration should also be given to the Framework’s expectation that regard should be given within Green Belt reviews to the intended permanence of Green Belt boundaries in the long term, so that they are capable of enduring beyond a plan period. As such, consideration should be given through up-to-date evidence to the need to identify additional or alternative areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the end date of the Plan.</p>	
	LPPO299	7	Support	Support for Section 7.	Support is noted.
	LPPO3806	Paragraph	Object	I object to the Council’s development strategy and	Objection is noted. It is a legal

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		7.1		<p>policy of changing the Green Belt boundaries in contradiction to its original purpose. There is no evidence of how sustainability will be achieved without creating a new town on the outskirts of the existing town that will do nothing to support the run down town centre.</p> <p>The same policy should apply to villages and other settlements.</p>	<p>requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>The Sustainability Appraisal (SA) sets out the alternative options that have been considered.</p>
	LPPO3625	7.1	Object	<p>7.1 -Paragraph 82 of the N.P.P.F states that a number of changes will be made to the Green Belt boundaries, I oppose using any aspects of the Green Belt for future development, especially land off Kimberley Avenue and any developments on the north of Kidderminster or the eastern edge.</p>	<p>Objection is noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This</p>

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					<p>will include some greenfield sites within the Green Belt.</p> <p>Note that the ADR site 'Land off Kimberlee Avenue' in Cookley has already been removed from the Green Belt as it was allocated as an ADR in a previously adopted Local Plan.</p>
	LPPO448	7	Object	<p>I object to any use of any greenfield sites until a complete use of brownfield and infill has been exhausted.</p>	<p>Objection is noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>
	LPPO3809	Paragraph 7.3	Object	<p>I object to the Council's development strategy and do not understand some of the terminology which should not be used for a document for public consultation.</p> <p>For this reason I wish to complain to the Council on grounds of maladministration. The consultation has been badly managed and designed specifically to</p>	<p>Objection is noted. 'Washed over' means the settlement is completely covered by Green Belt policy.</p>

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				prevent the public being able to understand it. It should be re-run at a time that avoids the main public holidays and no settlement should receive favouritism or protection on the issue development for the next 18 years.	
	LPPO3810	Paragraph 7.5	Object	I object to the Council's strategy for development; the perceived need is based upon flawed analysis and is unjustified so, there is no need to remove more land from the Green Belt.	Objection is noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.
	LPPO4481	7.5	Object	I would question this aspect as it has not been clearly evidenced why you need to remove land from the Green Belt.	Objection is noted. There is not enough deliverable brownfield land to accommodate all of our housing need in the District. Therefore, we must look at using Greenfield sites, some of which are in the Green Belt. There will be further evidence published at Pre-Submission stage.
	LPPO489	7.5	Object	Object to para 7.5.	Objection is noted.

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Worcestershire County Council, Planning Economy & Performance	LPP01140	7.6	Comment	The plan states that "minor changes to Green Belt boundaries may be appropriate to meet local needs or aspirations and to facilitate local and neighbourhood planning in the future". As national policy requires exceptional circumstances to justify alterations to Green Belt boundaries, and that Green Belt boundaries should be set for the plan period, we question whether local needs would be sufficient. As currently phrased this could result in both uncertainty and false expectations for local communities.	Comments noted. Agree that amendments to the text should be made.
	LPP03811	7.6	Object	I object to this statement and the Council's strategy for development which is not supported by independent analysis. The statement is contradictory and shows that the Council does not believe that the Green Belt is important.	Objection is noted.
	LPP03627	7.6	Object	<p>Development should not be considered around Cookley apart from a small portion on the blue print on the existing Lea Castle site. We already have a stretched and dangerous infrastructure and our facilities and services are already stretched to the maximum capacity.</p> <p>Cookley housing needs are for 33 affordable rented homes, I cannot therefore see the justification for option A 150 homes, option B 360 homes and an outlined planning application for an additional 600 dwellings, this would obviously mean building away from the blue print of existing buildings. We also need to take into account the bat population at Lea Castle.</p>	Objection is noted. Please note that the proposed 600 dwellings on the Lea Castle site is on Brownfield land. Development at the Lea Castle site would be kept separate from Cookley Village and would not merge into one. Infrastructure requirements are being considered alongside the emerging Local Plan in the Infrastructure Delivery Plan. Ecology issues on site are also being considered which includes the bat population on site.

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	LPPO4723	7.7	Comment	<p>7.7 Although I understand the reason why WFDC is now looking at Green Belt land and is to be applauded for concentrating on brownfield sites please can the plan give some regard to the fact that local, national and world circumstances change very quickly and assumptions made now will be out of date next year. The Brexit debate is one example. How many Kidderminster residents who are EU citizens will leave the area after Brexit?</p> <p>Once Green Belt land is gone it can never be replaced so Councillors and their Officers need to be sure that they are taking the right decisions with the right evidence</p>	Comments and issues raised are noted.
	LPPO3628	7.7	Object	7.7 Yes I agree that a Green Belt review needs to be carried out and included on the updated Local Plan, however I believe that it should remain the same.	Objection is noted.
	LPPO3630	7.7 ii	Object	7.7.ii - I commend you on being successful in utilising previously developed land and urge you to exhaust all these avenues first for future developments, I do not believe however that some of your ideas would be limited strategic adjustments to Green Belt boundary. I would see these as being damaging to our beautiful countryside and wildlife.	Objection is noted.
	LPPO3812	7.7	Object	I object to the Council's development strategy and this statement. It is not 'entirely appropriate' nor 'necessary' for the reasons I have supplied elsewhere. The perceived need is based on flawed analysis and is	Objection is noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The

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				unjustified. Thus there is no need to remove more land from the Green Belt.	Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.
	LPP0258	7.7	Object	<p>We walk on the footpaths that cross the Green Belt land identified as Option A in your plan. We are surprised and dismayed that this important Green Belt area is being considered for housing. We appreciate that the local council is under pressure from both government targets and a desire to provide housing, however, the council should be under similar pressure to protect the Green Belt.</p> <p>The Spennells estate is already large, those people have a rightful expectation to retain the access to the countryside. It seems short sighted to us to allow this valuable area to be degraded.</p> <p>In addition to our environmental concerns these fields are productive farm land and it is hard to see any reason which justifies the loss of such an area.</p>	Objection is noted.
Summerfield Against Land	LPP01619	Green Belt	Comment	We are not anti-housing, rather we think that brownfield/urban development is a desirable and	Comments are noted. It is a legal requirement for the Local Authority to

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Transformation		Review		<p>practical alternative strategy.</p> <p>We accept the need for housing but reject the use of Green Belt land in favour of brownfield sites and in this regard, require the Council to show more ingenuity and to resist developer preference for 'easy sites'</p> <ul style="list-style-type: none"> • We challenge the validity of the Green Belt review and question the way its findings are used to promote and legitimise both options, but especially Option A. Both options require an unacceptable incursion into the Green Belt which we challenge and reject. • The Study's objectives 1 and 3 indicate the presumption on the part of the Council to use Green Belt for development purposes. This clearly goes to motive in advance of the review rather than development need arising from the review. • There is some confusion as to the number of dwellings to be built on Green Belt Land. • Given its centrality to both Option A and Option B, the fact that there has been no public information or discussion of this prior to the publication of your draft Local Plan, effectively it is a <i>fait accompli</i>. • Attention is drawn to the role and value of the Green Belt yet assert the need for an eastern "Urban Extension". "The essential characteristic of Green Belt is their 	<p>have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>The Green Belt Study has been undertaken by Consultants that have done a number of these studies and therefore very experienced at undertaking Green Belt Reviews.</p>

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				<p>permanence and their protection must be maintained., to prevent urban sprawl by keeping land permanently open”.</p> <ul style="list-style-type: none"> Green Belt is our environment and something that we should nurture and pass on, intact, to future generations. Yes, there is a need for housing but we must also consider the quality of life for existing residents. Once the Green Belt has gone it is lost forever. 	
	LPPO2542	Green Belt Review	Object	Coalescence would occur between Stone, Summerfield, Stanklyn Lane and Spennells if the land to the rear of Spennells is built on therefore the definition of LIMITED CONTRIBUTION is wrong. The planners have been misled by an independent report and need to review the Local Plan based on this being a SIGNIFICANT CONTRIBUTION and breach of planning guidance.	Objection is noted.
	LPPO3813	7.8	Object	I object to the Council’s development strategy, the analysis is flawed and biased to suit the Councils siloed drive to develop.	Objection is noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This

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					will include some greenfield sites within the Green Belt.
	LPPO3814	7.9	Object	I object to the Council’s development strategy, the analysis is flawed and biased to suit the Councils drive to develop. Green Belt is not manufactured, once it has gone it cannot be reapplied.	Objection and comments are noted.
	LPPO405	7	Comment	See summary LPPO400.	Objection is noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.
	LPPO428	7	Comment	I object to Option A and Option B. Green Belt land should be used only as a VERY LAST RESORT. Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collaborate and collectively review overall brown field site availability and plan	Objection is noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough

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				<p>housing development accordingly – decisions to build on the Green Belt should not be based on local authority boundaries.</p> <p>The 5 year rolling time frame for construction sites should allow for regular reviews of brown field sites and enable changes to be incorporated into any plan,.</p> <p>The plan fails to recognise changes in shopping habits and unrealistically targets retail expansion and comparison shopping.</p> <p>Kidderminster has suffered from the failure to 'tidy up 'following the migration of Kidderminster town centre to Weavers Wharf and Crossley Retail Park.</p> <p>Retail premises and the courts building have been empty for 8 /9 years - the regeneration of such sites require radical solutions for alternative use that reduce any need to build on the Green Belt.</p> <p>Unnecessary decisions are being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping (indeed, the plan itself demonstrates an inability to predict /understand short term population levels in the District).</p> <p>The plan fails in its stated aim to "to use a robust and up-to-date evidence base to ensure that the local plan</p>	<p>deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				<p>meets the full, objectively assessed needs for market and affordable housing in the housing market area" . Instead it aims to justify what developers want to deliver rather than meet the needs of Kidderminster residents.</p> <p>Previous attempts to build an Eastern relief road have failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph road following the same route as the existing road from the Worcester Road through Mustow Green to the Birmingham Road - is it really a relief road at all?</p> <p>Whilst constructing a new school in the Spennells area appears attractive this (together with the promise of the 'relief road' shouldn't be the determining factor when opting to build on the Green Belt – other options should be sought.</p> <p>Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years. This situation equally relates to the areas covered by the LEPs identified in the plan.</p> <p>Whilst economic development in Kidderminster will be welcome - past experience shows this will take time –</p>	

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				<p>in the meantime people will continue to travel.</p> <p>Immediate need is for fresh radical thinking that optimises the use of brown field sites throughout the LEP areas for residential use and enables Kidderminster itself to become a modern, contained and attractive town centre that incorporates retail leisure and residential opportunities rather than pursue outdated models from the past - 'mixed use' communicates little other than the elements of 'wishful thinking' so often reported in the local press over numerous years.</p>	
Save the Green Belt Surrounding Villages in North Worcestershire	LPPO680	Green Belt	Comment	<p>Save the Green Belt surrounding villages in North Worcestershire Wyre Forest District Council has stated the aim of its Local Plan Review is to "make sure the right development happens in the right places". However the planning maps show a disproportionate and aggressive housing development that will mean that the villages of Cookley, Hurcott and Stone will be joined onto the nearby town of Kidderminster. There is a need for housing development, shared throughout the Wyre Forest district, but providing that need by destroying Green Belt and annexing villages to the town of Kidderminster, is not a sustainable or proportionate way to do this. North Worcestershire is a green and pleasant landscape, with a mix of towns and villages. It is your duty to make sure it remains so and not to sacrifice the Green Belt leaving an urban sprawl as a legacy for future generations.</p> <p>Save the Green Belt online petition received. Contains</p>	Comments noted.

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				1773 signatures which are local, national and international.	
Rushock Parish Council	LPP01104	Green Belt	Comment	We are concerned about the proposed erosion of the Green Belt.	Comments noted.
Worcestershire County Council, Planning Economy & Performance	LPP01139	Policy 7	Comment	The third and fourth bullet points set out the ADRs that are allocated or safeguarded, but neither the policy nor the reasoned justification explain why it is appropriate to allocate the Hurcott ADR.	Comments noted.
Kidderminster Civic Society	LPP01169	Use of Green Belt	Comment	Accepts that some Green Belt will be lost, but expect this to be kept to a minimum, so that the remaining Green Belt area between settlements will ensure and support local distinction in the Wyre Forest district.	Comments noted.
Stourport on Severn Town Council	LPP01258	Green Belt release	Comment	STC considers it unnecessary to extend into the Green Belt when there are a number of Core sites in the town which should be given priority.	Comments are noted.
Wyre Forest Green Party	LPP01402	Green Belt	Comment	Much of the Green Belt land is used for productive farming activity which should be maintained and enhanced on ecologically sustainable principles rather than destroyed.	Comments are noted.
Wyre Forest Green Party	LPP01473	Green Belt	Comment	The purpose of Green Belt is to: <ol style="list-style-type: none"> Check unrestricted urban sprawl. The “Option A” proposal would increase the boundaries of Kidderminster extensively, while development 	Comments are noted.

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				<p>under “Option B” would still have a more dispersed effect upon a range of town boundaries.</p> <ol style="list-style-type: none"> 2. Prevent neighbouring towns from merging. The development adjacent to Spennells would mean that Spennells would merge with Summerfield and Stone, thus losing their separate identities. 3. To assist in safeguarding the countryside from encroachment. The development in “Option A”, in particular, would encroach significantly into open Green Belt land. 4. To preserve the setting and special character of historic towns. 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land – Thereby providing the planning imperative to use brownfield sites first <p>In designating the Wyre Forest as Green Belt, the following benefits have been seen:</p> <ol style="list-style-type: none"> 1. Providing opportunities for access to the open countryside for the urban population. 2. Providing opportunities for outdoor sport and outdoor recreation near urban areas. 3. The retention of attractive landscapes and the enhancement of landscapes, near to where people live. 	

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				<p>4. Improvement of damaged and derelict land around towns.</p> <p>5. The securing of nature conservation interests.</p> <p>6. The retention of land in agricultural, forestry and related uses.</p>	
	LPPQ2164	Green Belt	Comment	<p>A detailed response received regarding the proposed development to the east of Kidderminster. A summary of this response is listed below:</p> <ul style="list-style-type: none"> • Residents are demonstrating/opposing development in these Green Belt areas, in part, as they enjoy using the immediate countryside on the east of Kidderminster for walks, running, cycling, even driving into and out of the area via scenic countryside. Any development should retain these elements by the planning that is granted specifically stating developments are of a low-medium density. Fields can still exist between pockets of development. The dwellings in these pockets of development should reflect, to a certain degree, buildings found in rural areas. • Green Belt land should always come with extremely strict planning that is appropriate to the area. • Regarding the scenic countryside along major roads in and out of Kidderminster. Planning could prevent development immediately 	Comments are noted.

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				<p>adjacent to the main roads in and out of Wyre Forest so that the 'image' of scenic countryside in and out of the area is not compromised. Please do not underestimate the importance of this to an individual's view of an area and their daily commute. I have friends from outside the area that complement the rural feel of Kidderminster due to these scenic routes in and out of the town.</p>	
	LPP04582	Green Belt	Comment	<p>On page 47, in Policy 7 it states "The current approach to "insetting" and "washed over" status of specific villages will be retained although village envelopes will be revisited to allow for development to meet local needs." It also states that that the Plan will endeavour to maintain the identity and integrity of individual settlements and check the unrestricted sprawl of large built up areas. How is a development of 1200 – 1400 homes joining Cookley at the northern end, to Broadwaters, Kidderminster at the southern, in any way a development that meets the needs of Cookley as a village. Our village envelope will be stretched to Kidderminster and our Green Belt will be decimated.</p> <p>In the table on page 29, Cookley is referred to as Inset Green Belt. How will Cookley be Inset Green Belt when our southern Green Belt is completely removed? I would infer from this that your intention is to join Cookley to Kidderminster, therefore negating your</p>	<p>Comments are noted. Agree that Cookley Village does have its own identity and this should be preserved. Proposals in the emerging Local Plan will not merge Cookley into Lea Castle or northern Kidderminster. The separation of Cookley Village from these areas will be protected. However, development in the Green Belt does need to happen as there are not enough deliverable brownfield sites to accommodate the future housing requirement. The emerging Local Plan seeks to locate future development in sustainable locations.</p>

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				<p>obligation to protect Cookley as a village Inset Green Belt.</p> <p>Its seems that the reason the WFDC is putting forward Option A is that if the development is sufficiently large enough i.e. over 1000 houses then this could warrant additional infrastructure, roads, doctors, schools etc. which wouldn't be forthcoming for a smaller development. So in order to support this massive development, effectively an extension of Kidderminster, we need to decimate the Green Belt and the identity and integrity of the individual settlement of Cookley be taken away. The whole point of living in a village is that it has its own identity, its own parish council, facilities and sense of belonging. We do not want this taken away from us by the unrestricted sprawl of a large built up area and we definitely want to keep our Green Belt which prevents this from happening.</p> <p>It appears that Wolverley is 'washed over' for some reason which is not made clear. Why is Wolverley washed over? It is the sister village of Cookley and Caunsall with the same Parish Council so should be treated equally. Both inset in Green Belt. With sensitive building on these Brownfield sites together with the same on the Lea Castle site I am sure we would meet the needs of our village and deliver our quota of housing proportionately to the rest of Wyre Forest.</p>	

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				Cookley is a Village INSET in Green Belt. It has its own strong identity and provides key local services.	
Barratt Homes West Midlands	LPPO773	Policy 7	Object	<p>Policy 7 incorrectly interprets requirements of the Framework. Paragraph 83 confirms that once established, Green Belt boundaries should only be altered in “exceptional circumstances”. The policy provides no guidance on how the exceptional circumstances test has to be considered in the preparation of the emerging plan.</p> <p>The policy refers to Paragraph 82 of the NPPF. This provides guidance on new Green Belts. Reference should be made to Paragraph 83.</p>	Comments noted and amendments to be actioned.
	LPPO1079	Policy 7	Object	<ul style="list-style-type: none"> • Policy 7 it states “The current approach to “insetting” and “washed over” status of specific villages will be retained although village envelopes will be revisited to allow for development to meet local needs.” The scale of development around Cookley (1200-1400) does not meet the needs of Cookley as a village. Our village envelope will be stretched to Kidderminster and our Green Belt will be decimated. • Cookley is referred to as Inset Green Belt. How will Cookley be Inset Green Belt when our southern Green Belt is completely removed? I would infer from this that your intention is to join Cookley to Kidderminster, therefore negating your obligation to protect Cookley as 	The intention is not to join Cookley to Kidderminster. Future development at Lea Castle would create a stand alone settlement with its own services and local facilities. The former hospital site within Lea Castle is a brownfield site. The development would therefore be making good use of a previously developed site in the Green Belt.

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				a village Inset Green Belt.	
	LPP01587	Green Belt	Object	<p>Preferred Option sites OC/5 (Husum Way) and WFR/CB/7 (Land off Birmingham Road), to the east of Kidderminster in the parish of Blakedown and Churchill. This is all Green Belt.</p> <p>The Preferred Options is generally based on the outsourced Amec Foster Wheeler (AFW) Green Belt Review Reports. Seeking to designate the Green Belt as having a “Significant Contribution” (SC), “Contribution” (C) or “Limited Contribution” (LC). The AFW comments generally are very subjective and contain factual inaccuracies such as lack of countryside views to the surroundings.</p> <p>Nonetheless, OC/5 is stated as having designations of SC in the protection against “sprawl”, C for “encroachment” and an “overall” rating of C. Strangely, they gave a classification of LC with regards to “merger”. In addition, the AFW report gave an assessment of ‘none’ against the Green Belt preserving the setting of the character of villages and other settlements in relation to our position, which is opposed to their SC designation for protection against sprawl.</p> <p>National Planning Policy Framework</p> <p>It is considered the salient sections of the NPPF relating to loss of Green Belt land when considering the Preferred Options to the Local Plan by WFDC are: The purpose of Green Belt includes to assist in safeguarding</p>	Objection is noted.

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				<p>the countryside from encroachment.</p> <ul style="list-style-type: none"> • Preserving the setting and character of villages and other settlements. • Assist in urban regeneration by encouraging the re-cycling of derelict and other urban land. • Avoiding taking out of Green Belt prime agricultural land. <p>From the north passing to the east and south will be housing development culminating in a massive loss of at least 266 ha. of Green Belt land.</p> <p>The Preferred Options are contrary to the aims and objectives of both Wyre Forest's stated planning objectives and those of the NPPF. The concentrated loss of good quality Green Belt land is unacceptable.</p>	
	LPPO3682	Section 7	Object	<p>Green Belt; by constantly eroding the Green Belt Wyre Forest is in danger of destroying the main reason why people come to Wyre Forest. Once gone it can never be returned and the impacts will be realised by our children when it is too late. Kidderminster will be turned into a soulless commuter town such as Redditch – which has been destroyed and lost its character and distinctiveness.</p>	Comments are noted.
	LPPO4114	7 Green Belt	Object	<p>All brown field sites should be used for housing before any green field site is made available - we would be taking our children's heritage if fields were built on.</p>	Brownfield sites have been considered as part of the proposed site allocations. However, there are not enough

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				They cannot be regained.	deliverable brownfield sites to accommodate the housing need for the District.
Bournewood Nurseries	LPP01962	Green Belt Review	Support	<p>We fully support commitment to Green Belt Review through its plan preparation process. It is fully acknowledged that this will enable development to be brought forward in a number of sustainable locations that would otherwise be constrained from growth without compromising too heavily the purposes of including land within the Green Belt.</p> <p>Removal of any site from the Green Belt will have some impact but the perceived impact could be minimised (across the district) by removing a larger volume of smaller sites rather than a smaller number of large sites which will have greater impact in their respective locations. This would better contain development and prevent urban sprawl in larger volumes which is in conflict with the requirements of the Green Belt as outlined in the NPPF. It is felt preferable that release of smaller sites across the area would reduce the impact on the Green Belt, and its purpose as a spatial planning tool, by allowing small growth parcels instead of larger volumes with great impact.</p>	Support and comments are noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	Officer Response
Homes England	LPP0805	Policy 8A	Comment	<p>Policy requires average of 35 dwellings per hectare on new greenfield sites. Important that the Council's density requirements are flexible, particularly on peripheral greenfield/Green Belt sites where a lower density may be more appropriate or in cases where a particular type or size of housing is required. Density required for developments should be determined on individual circumstances of a site and as part of a masterplanning exercise that takes into account site specific constraints and also opportunities for higher density development such as close to public transport routes and facilities.</p> <p>The provision of an indicative mix for market and affordable dwellings is welcomed, but it must be recognised that this is indicative only as it could change considerably throughout the plan period.</p>	<p>We will follow the NPPF guidance regarding density on sites.</p> <p>The policy states that an average density of 35dph will be sought for Greenfield sites, although densities should reflect the density of surrounding areas. Where site specific policies are proposed, specific densities will be considered in accordance with masterplanning principles.</p> <p>The threshold and mix for affordable and market housing will be based on evidence from within the Objectively Assessed Housing Needs/ Housing Market Assessment and Viability work which is updated on a regular basis.</p>
Bewdley Town Council	LPP0827	Policy 8A	Comment	<p>Neighbourhood Plan consultation responses show that starter, low cost market and affordable 1 & 2 bed dwellings are most needed followed by housing specifically for the elderly. Young people are leaving town due to lack of affordable housing.</p>	<p>Comments noted.</p>
Miller Homes	LPP0962	Policy 8A	Object	<p>Object to the suggested housing mix within Policy 8A.</p> <p>The National Planning Policy Framework (NPPF) requires 1 Local Planning Authorities (LPAs) to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups</p>	<p>The split proposed is between types of affordable housing e.g. the ratio of rented to low cost home ownership. This is based on income data and housing costs for Wyre Forest. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the</p>

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				<p>in the community, as well as identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. To inform the Local Plan, the NPPF also requires 2 LPAs to prepare a Strategic Housing Market Assessment (SHMA).</p> <p>The latest Objective Assessment of Housing Need (OAHN) report for the District³ includes a suggested dwelling mix for market and affordable dwellings based on a review of the current stock profile for the District, general household preferences (from household survey data) and affordable requirements and notes that this has been carried forward into the body of proposed Policy 8A.</p> <p>It is not clear from the OAHN report : (i) why dwelling size data has been split based on assuming a 66.6% market and 33.3% affordable apportionment given that both existing and emerging Wyre Forest District Council (WFDC) affordable housing policy seeks affordable housing provision on new developments of 30%; (ii) why the use of household survey data on dwelling stock occupancy is appropriate for forecasting the future housing mix for the District; and (iii) how the proposed separate dwelling size apportionment for market and affordable dwellings was worked out.</p> <p>The NPPF⁴ makes it clear that each local planning authority should ensure that their Local Plan is based on adequate, up-to-date and relevant evidence. With so</p>	<p>time and will be updated to reflect changes in the NPPF and PPG.</p>

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				<p>much uncertainty behind how the suggested housing mix figures taken from the OAHN report have been derived, and how it should be applied, our client questions the appropriateness for including a housing mix within the body of the policy wording, even if it is badged as only being a suggested mix.</p> <p>Support the inclusion within the policy wording of the requirement for new housing developments to: be well designed; address local housing needs; incorporate a range of different types, tenures and sizes of housing to create mixed communities; and for the make up of individual developments and their design and density to be in sympathy with the development context and existing neighbouring development.</p> <p>However to provide the flexibility that house builders require, suggest that this policy wording could be expanded to allow the housing mix to be considered on a site by site basis to reflect not only the location and context of the site, giving regard to the latest SHMA or other up to date OAHN assessment reporting, but also to take account of demographic trends, market trends, the needs of the community and viability considerations, to allow house builders to continue viably building and selling houses.</p> <p>This is therefore not suggesting that the suggested dwelling mix taken from the OAHN report should be ignored, but it may be more appropriate for this to be</p>	

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				included within the supporting text justification for the Policy as an example of the latest evidence base reporting position rather than in the body of the Policy wording. The OAHN figures are more useful we suggest, as part of a wider evidence base underpinning the housing mix proposed when sites actually come forward, reflecting adequate, up to date and relevant sources.	
Moor Park Trustees	LPPO1103	Policy 8A	Comment	Policies should not seek to rigidly apply generic district wide housing mix and density requirements but be relatively flexible in order to be responsive to matters such as the individual characteristics of sites and evidence, independently verified or reviewed if required, from the market at the time of application. One of the key elements for such sites is that they are deliverable and sustainable.	Comments noted.
Rentplus	LPPO1108	Policy 8A	Comment	<p>This policy should seek to maximise the delivery of affordable housing appropriate to its context; delivering housing that meets local needs, and aspirations whilst integrating with the wider community and contributing to the delivery of mixed neighbourhoods. We recommend the following amendment to set this out more clearly:</p> <p><i>“New housing developments must be well designed and address local housing needs <u>and aspirations</u>, incorporating a range of different types, tenures and sizes of housing to create mixed communities.”</i></p> <p>This is important because the full range of affordable</p>	Comments noted. We will support the provision of a range of affordable housing types on sites but the most acute need within Wyre Forest is for households who are unable to afford anything other than social rent so we will work with Registered Providers and Developers to meet our identified housing need.

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				housing models, including rent to buy offer a new, more widely accessible route to home ownership than those models already explicitly defined in the NPPF. We have responded to the White Paper consultation, setting out that rent to buy is not an intermediate tenure, but should be defined separately to take into account its unique characteristics. As rent to buy homes are rented at an affordable rent for a defined period (in the case of the Rentplus model for 5 year-periods of 5, 10, 15 or 20 years), during which the property is managed by a partner Registered Provider and tenants are able to save towards full purchase of that home. This tenure enables aspirant households with no savings, and thus no access to a mortgage for a shared ownership or open market property, to save for full purchase within an affordable rented property. As these households do not have to move home to purchase, this also provides them with stability and contributes to developing successful places by enabling greater integration of households within their community.	
Wyre Forest District Council - Development Control	LPP01205	Policy 8A	Comment	Why is table 8.0.1 based upon a 33.3% affordable split, when policy 8B talks about a policy requirement for 30%?	This refers to the split between different types of affordable housing product not the percentage that is affordable units on open market sites (30%).
West Midlands HARP Planning Consortium	LPP01334	Policy 8A	Comment	We support what has been written, but it would remain useful to have a note in the Policy stating that density and housing mix will be determined with reference to identified local needs and viability.	Densities of housing site will be determined through a response to the character and nature of the surrounding locality.

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Gladman Developments Limited	LPP01348	Policy 8A	Object	Gladman are of the view that planning policies should not seek to rigidly apply generic district wide housing mix and density requirements. Any such policies should be suitably flexible in order to be responsive to matters such as the individual characteristics of sites, viability and changes to the market conditions over time. In this regard, Gladman would highlight that Table 8.0.1 provides an indication of district wide need at a fixed point in time based on analysis undertaken by Amion in 2016/17	Agree that housing densities should reflect surrounding area. Site specific policies, where large enough, will look at densities as part of a masterplanning process.
Stanmore Properties Ltd	LPP01512	Policy 8A	Comment	The policy states it is anticipated that new greenfield developments will have an average density of 35 dwellings per hectare. This does not appear to be followed through to the number of dwellings allocated on Core Housing Site South of Stourbridge Road (including Hurcott ADR) (BW/4) which is proposed for 200 dwellings. The site as proposed to be allocated is 13.80 ha gross. Even allowing for a generous reduction of 35% for Green Infrastructure, 314 dwellings could be provided at 35 dwellings per hectare ($13.80 - 35\% = 8.97 \times 35\text{dph}$).	Comments noted.
Taylor Wimpey West Midlands	LPP01515	Policy 8A	Comment	Policy overly prescriptive given that in different locations there may be an excessive amount of a particular dwelling size and, therefore, any new proposal should not be constrained from delivering an appropriate mix to achieve a better balance overall. Further, the annual base dwellings is incorrect as it specifies that the affordable proportions will achieve 100 dwellings and 200 market dwellings. This is inconsistent with the	Comments noted. Policy will be amended to ensure consistency of figures throughout the document. Please see the Affordable Housing SPD for more information on determining the mix on a site specific basis.

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				<p>development requirements set out in Policy 6A, which requires 90 affordable and 210 market dwellings.</p> <p>Average density requirement consistent with the NPPF however, there should be some flexibility to reflect local character, may be at a lower/ higher density.</p>	
Wyre Forest Community Housing	LPP01654	Policy 8A	Comment	<p>Group's records, as demonstrated by Homes Choice Plus, indicates a slightly higher need for 3 + bedroomed homes. In consideration of this data, we would recommend that the mix of homes proposed in the Local Plan Review Document is reviewed and restated with an increased number of 3+ bedroomed homes.</p> <p>Please also see comments made by West Midlands HARP Planning Consortium.</p>	The Amion report uses data from HC+ after certain household types have been removed (e.g. those seeking shared ownership and transfers) so the percentages will appear different. This is to ensure we only consider the housing needs of those in the greatest need.
Persimmon Homes Limited	LPP01554	Policy 8A	Comment	<p>Not clear in the policy where the required need for 35 dwellings per hectare for Greenfield has been derived from and so this figure is unjustified. The Council is required to justify this figure using the most up to date evidence that is available.</p>	Comments noted.
	LPP03633	Policy 8A	Object	<p>New housing developments should be made from eco friendly materials and be more gentle on our landscape and be run on renewable self sufficient energy.</p>	Comments noted.
	LPP03819	Policy 8A	Comment	<p>Stourport, like most of Wyre Forest has a population structure skewed to +65 age group. However, whilst there is concern in the plan with providing affordable housing, this is to the detriment of the requirements for</p>	Comments noted. The updated OAHN will include further details on household requirements and we understand that Homes England will publish more

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				<p>a mixed housing stock and one which addresses the down-sizing needs of retirement and ageing. The plan makes poor consideration of ‘future-proofing’ house designs, mix or adaptability, through policy guidance in the document, or through requirements for masterplans, action plans or details required at outline. To offer the alternatives to +65’s of ‘institutions’ or ‘a bungalow’ is derisory and dismissive of aspirations of older people as well as defining new developments without recognition of social/age mix/future needs or technologies. Sustainability can be delivered by all communities, rural and urban, but there must be recognition of the need for adaptability/flexibility and changing technologies at the outset in requirements for new development sites for housing, but not uniquely so.</p>	<p>information about Lifetime Homes shortly. These requirements will be given consideration in the pre-submission policy.</p>
	LPPO4534	Policy 8A	Comment	<p>Kidderminster needs centralised high density housing rather than low density housing on greenfield land. Half of the tower blocks were (rightly) demolished in the Horsefair under a previous plan that involved the development of land behind Sainsbury's. The majority of housing plans since have been low density out of town estates moving the population out of the town centre, increasing traffic into the centre and requiring the construction of additional link roads.</p> <p>A key point should be that in order to meet lower Co2 targets the plan should be promoting centralised housing development that reduces the dependency on car traffic.</p>	<p>We will follow NPPF requirements on housing density in urban areas.</p>

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	LPPO4724	Policy 8A	Comment	<p>I would make a plea in this section for more bungalows to be included in any plans for housing type within the plan. Building a range of bungalows which are attractive to residents of both social housing and owner occupiers will free up family homes in other areas of Kidderminster as people can downsize into something more suitable. (Para 2.9 table 2.0.1)</p> <p>I understand that developers don't like building bungalows as the 'footprint' is bigger and they can't cram in so many 'dwellings' to maximise their profits but, for once, I would like to think that my council would put the needs of residents over that of the developers.</p>	The updated OAHN will provide more information on the housing requirements of older people. The Council must consider the financial viability of a site alongside meeting a range of needs.
Worcestershire County Council, Planning Economy & Performance	LPPO1143	Policy 8A	Comment	Table 8.0.1 refers to 96.2% of affordable dwellings being one-bed or two-bed dwellings. This is an extremely high, particularly in comparison to 3% of 3 bed dwellings and it would be helpful to set out the local issues justifying such a proportion. Section 8.6 refers to the AMION report, which presumably sets out the more detailed evidence behind the figures, but from a cursory scan through this report, the relevant section wasn't immediately obvious. Given the proportion is so high, it may be worth summarising the evidence within the Local Plan itself.	This information is included in the Amion report. This will be updated by a new OAHN.
	LPPO4655	Policy 8B	Comment	<p>The need for social housing and genuinely affordable housing:</p> <p>Section 8 of the local plan provides compelling evidence of the need for more social housing locally. The over-</p>	Comments noted. The council works with Empty Property owners who want to bring properties back into use and would support conversion of units where it is appropriate to do so.

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				<p>estimate of all dwellings confirmed may disguise the urgent need for social housing. The Spennells will not provide the social housing and affordable housing needed as it is traditionally mixed housing.</p> <p>Worcester Street, from the old Woolworths premises to the estate agents adjoining Prospect Hill looks tired and detracts considerably. With the uptake of internet shopping footfall is unlikely to increase. Surely, the few un-boarded retail businesses on Worcester Street could relocate by a few yards, attracting more business and a greater buzz. The vacated properties could then be converted or replaced to provide the social and affordable housing desperately required</p>	
	LPPO2989	Policy 8B	Comment	<p>* I broadly support Option A because I feel that the infrastructure gains are very important.</p> <p>*Policy 13 on Public Transport needs to recognise the appalling bus services which we have at the moment. I feel that we should go back to municipally owned, supported and operated bus services. The three towns could be connected by a tram system.</p> <p>I fully support the idea that people should live in town centres. It makes sense to use the unused space over shops and business premises for housing. Worcester Street and Oxford Street should be redeveloped for housing as the retail units in these streets are either empty or under-used.</p>	Comments noted. Affordable housing has a local connection criteria applied to it.

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				<p>New housing developments need to be based on affordability for residents, with an emphasis on smaller, cheaper homes costing £130,000 and less.</p> <p>A "St Ives Scheme" which reserves new homes for local people has a lot to recommend it. Residents need to be able to afford to live and work in Wyre Forest. There is nothing gained by providing 6000 homes if they are filled with people who move into the area from elsewhere.</p>	
	LPPO4496	Policy 8B	Comment	<p>Social housing must only be provided on the proviso that it is not for life but for a particular time. OAPs living cannot expect to occupy 3 bedroomed social housing when families need somewhere to live.</p>	<p>Comments noted. Please see the Councils Tenancy Strategy.</p>
	LPPO3636	Policy 8B	Object	<p>The 100 affordable homes to be built per annum should be increased % wise to 50% of the overall total of homes built. Affordable housing provision should be increased to 40% on sites of 11+ splitting for 20% rent 20% buy shared ownership.</p> <p>The build to rent scheme should be encouraged and matched to working partnerships and non traditional methods should be compulsory.</p> <p>You say that you support such projects, however when The Balanced Oak proposal was set before you, even though most departments were in favour, no support was offered at all.</p>	<p>The percentage of affordable homes is based on the Viability study undertaken alongside the Local Plan review. At the time this indicated that 30% was an appropriate and deliverable threshold. The split between affordable rented to shared ownership products is outlined in the Amion study based on the evidence of affordability and incomes across the district.</p>

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Persimmon Homes Limited	LPP01555	Policy 8B	Comment	<p>Do not dispute that there is a considerable shortfall in affordable housing in the District.</p> <p>The current wording of the policy seeks to achieve a minimum of 30% affordable housing, suggesting that the rate sought may indeed be higher. The Council’s viability assessment has appraised the affordable housing threshold of 30%, but has not tested any alternative scenarios and as such, the Council is unjustified in seeking these requirements.</p> <p>It should be expected that the affordable housing target should be guided by the level of need, derived from the SHMA and the financial capability of schemes to contribute towards the target.</p> <p>Do not agree with the Council’s current evidence as part of this policy and would expect that this is given further consideration prior to submission, to ensure that the evidence is proportionate and takes into account local data surrounding including land values, construction costs and the implications of the Community Infrastructure Levy (CIL) charging schedule.</p>	The council will use an updated viability study to determine thresholds for affordable housing but has tested a range of affordable housing thresholds across a range of sites – please see the viability technical evidence.
Wyre Forest Community Housing	LPP01657	Policy 8B	Comment	<p>The Group would recommend including the possibility of mixed tenure housing on rural exception sites where open market homes can be proven to make sites viable.</p> <p>Please also see comments made by West Midlands HARP Planning Consortium.</p>	Comments noted and inline with current policy.

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Taylor Wimpey West Midlands	LPP01519	Policy 8B	Comment	<p>Level of housing provision is stated to be 100 dwellings per annum, which is 10 dwellings higher than that identified in Policy 6A. Level of provision should be consistent with the development requirements.</p> <p>Policy outlines a level of 30% affordable, no evidence examining the viability of delivering this level of affordable housing. Such evidence needs to demonstrate the policy aspiration is deliverable.</p> <p>Tenure split - 65 rented and 35 intermediate tenure target, Table G4 shows four years of affordable housing provision this is a very short period and the individual years show very different proportions, which on average overall represent 65 rented and 35 intermediate. Plan should not be too prescriptive setting out targets should be flexible to allow for site specific circumstances where it may be appropriate to offer a different proportional split.</p> <p>Build to rent schemes, policy requires security of tenure through tenancy agreements of 3 years or more. This may not be appropriate for all build to rent proposals, should be some flexibility of this requirement.</p> <p>In terms of encouraging a scheme to consider non-traditional building methods where poor viability has been demonstrated, such methods may offer a cost saving, this is unlikely to be the case for national volume housebuilders who have particular house types and</p>	<p>Policy will be amended to ensure consistency of figures throughout the document.</p> <p>The viability study was included as part of the evidence available on the website.</p> <p>Comments noted.</p> <p>We will follow PPG and NPPF requirements.</p>

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				<p>processes that currently maximise efficiency in both design and build.</p> <p>The concept of starter homes, in the Housing White Paper 2017, is not referred to within the emerging policy. The White Paper states that they want local authorities to deliver starter homes as part of a mixed package of affordable housing that can respond to the local needs and markets and that the Government will commence a general duty on Council's to promote the supply of starter homes. Finally, it is proposed that the Government will amend the NPPF to introduce a clear policy expectations that housing sites deliver a minimum 10% affordable home ownership units. It is considered that the Council should review the affordable housing policy and incorporate starter homes within the definition, which will serve to meet the needs of households in Wyre Forest District.</p>	
Wyre Forest District Council - Development Control	LPP01206	Policy 8B	Comment	States that a min average annual of 100 Affordable dwellings will be delivered. Table 6.0.1 at Policy 6A states need as 90 per year. 65/35% tenure split - is that correct, I would have expected rental split to be higher (75%?)	<p>Policy will be amended to ensure consistency of figures throughout the document.</p> <p>The split is based on affordability and income correct at the time the OAHN was completed in 2017.</p>
Victoria Carpets	LPP01502	Policy 8B	Support	We support the flexibility in Policy 8B which recognises that the proposed level of provision (30% on sites of 11 or more dwellings) may not be achievable on all development sites and this would need to be evidenced	Comments noted.

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				through independently verified financial viability assessment. This is in accordance with the NPPF.	
Gladman Developments Limited	LPP01358	Policy 8B	Comment	<p>The affordable housing target should be fully justified through an assessment of whole plan viability.</p> <p>The proposed tenure split is expressed as being indicative. The definition of affordable housing may well change over the life time of the Local Plan. The exact split will also need to be determined by market conditions on a site by site basis.</p> <p>Local planning policies should allow the housing density and mix on individual sites to be determined on a case by case basis according to individual site requirements and prevailing market conditions to ensure that sites are viable and responsive to the particular circumstances associated with them.</p>	Comments noted.
West Midlands HARP Planning Consortium	LPP01335	Policy 8B	Comment	<p>The following line in Policy 8B needs to be reviewed or deleted from the Policy: <i>“Individual site characteristics may mean that this level of provision is not achievable on all development sites and this will need to be evidenced by the applicant through an independently verified financial viability assessment.”</i> This sentence does not clarify that a viability assessment will be required if provision fall below 30% meaning that the Council could request a full viability assessment for every application even if they are over-providing which is unreasonable and unjustified. We recommend that the Council clarify this policy and recommend that the</p>	Comments noted. We will follow NPPF requirements regarding viability testing the plan and only further viability testing if schemes are non-compliant.

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				<p>Council seek to negotiate delivery that suits individual circumstances.</p> <p>We recommend removing the NPPF definition in this section as you don't need to repeat national policy. Further, the definition of affordable housing in the NPPF is under proposals to be amended to include such tenures as discount open market rented. Including a line which aligns the definition of affordable housing within the NPPF will ensure that the Local Plan stays up to date with changing national policy and innovative new models of affordable housing which can maximise delivery across the Plan period.</p> <p>The reference to sub-market private rent is not in the current definition of affordable housing as set in the NPPF and therefore should be removed as it is not consistent with national policy.</p>	
Homes England	LPPO813	Policy 8B	Comment	<p>Policy states minimum of 30% affordable housing will be required on sites of 11 dwellings or more. The policy recognises that in some cases this level may not be achievable, and in such instances evidence is required by a financial viability assessment. This policy is supported as it recognises that 30% may not be viable in all cases</p> <p>With regards to the indicative tenure split of 65% rented and 35% intermediate, it is agreed that this provision should be subject to housing need at the time of construction, and the viability of individual schemes</p>	Comments noted.

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				as the required split could change over the plan period.	
Campaign to Protect Rural England	LPP0936	Policy 8B	Comment	30% requirement for affordable housing is lower than Bromsgrove and Birmingham which have 40% achieved by allowing % of intermediate tenures. Oppose use of thresholds. This policy implies no rural affordable homes unless on rural exception sites which would require public funding making delivery harder.	Please see the separate rural housing policy.
Miller Homes	LPP0972	Policy 8B	Support	<p>Support the inclusion of the explicit recognition within the wording of this Policy that individual site characteristics may mean that the stated 30% affordable housing provision is not achievable on all development sites, if evidenced through a financial viability assessment, and that the exact tenure split will be determined on a site by site basis based on housing need and viability (if relevant).</p> <p>The National Planning Policy Framework (NPPF) requires¹ that:</p> <p><i>“Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development in their area of all existing and proposed standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should</i></p>	The policy will be updated to include current NPPF guidance.

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				<p><i>facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence”.</i></p> <p>It is therefore important for the new Local Plan to take appropriate evidence and development viability into consideration when setting and applying affordable housing policies, to account for the fact that every development site is different.</p>	
Rentplus	LPPO1109	Policy 8B	Comment	<p>The minimum annual average target given in this policy differs from that set out in Policy 6A; we support the higher target figure, but note that to achieve higher delivery the Council should be as flexible as possible in negotiating mix and delivery mechanisms with providers of affordable housing. This includes being flexible on the tenure split, as already set out in the policy; this should include allowing for the delivery of rent to buy as a hybrid model which provides a route to home ownership through affordable rent. The need for rented homes is well recognised by the Plan, and this need will be met by the delivery of an appropriate range of social rented, affordable rented and rent to buy housing. The statement that the Council will reflect the White Paper proposals should be reflected in the final version of this policy:</p> <p><i>“An indicative tenure split of 65% rented (including social, affordable and rent to buy) and 35% intermediate</i></p>	Comments noted.

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				<p><i>tenure (including sub-market private rent and shared ownership) will be sought for affordable housing provision on new sites. The exact split to be determined on a site by site basis based on housing need and viability (if relevant)."</i></p> <p>The above recommended alteration will enable the Council to be responsive to the Government's emphasis on widening opportunities for home ownership, whilst still meeting the significant levels of need for rented properties.</p>	
	LPPO1706	Plough Lane, Far Forest	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> • Change of character to the area. 	Objection is noted.
Chaddesley Corbett Parish Council	LPPO1037	Policy 8C	Support	<p>We support this policy, but suggest that the criteria for rural exception sites should include additional wording from the NPPF:</p> <ul style="list-style-type: none"> • “..housing should be located where it will enhance or maintain the vitality of rural communities.” • “..authorities should avoid new isolated homes in the countryside unless there are special circumstances...” 	We will consider this amendment to the policy.
National Farmers Union	LPPO1119	Policy 8C	Comment	Welcomes the support for small scale residential development to meet local needs in rural settlements.	Comments noted.

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West Midlands Region				Also welcomes the policy on Rural Workers Dwellings. Encouraging that the council has recognised proposed rural workers dwellings need to be of a size commensurate with the functional requirement and financial capabilities of the enterprise. When new dwellings are constructed for farm businesses it is important that they are large enough to cope with the many demands of the farm business (such as an office entrance porch and utility), together with the needs of a farming family. This is important for maintaining adequate bio security measures. An agricultural dwelling must be flexible enough to accommodate families at a range of life stages. Farming families do not have the option of moving house if they should outgrow their home and this must be recognised when planning new accommodation.	
Wyre Forest District Council - Development Control	LPP01213	Policy 8C	Comment	We mention comprehensive marketing for 12 months to support COU in Policy 21A. Should we be specifying a similar timeframe within policy 8C (rural workers dwellings).	Comments noted. We will consider if this is necessary in policy update.
Wyre Forest District Council - Development Control	LPP01214	Policy 8C	Comment	We mention comprehensive marketing for 12 months to support COU. Thinking back, should we be specifying a similar timeframe within policy 8C (rural workers dwellings) above.	Comments noted. We will consider if this is necessary in policy update.
West Midlands HARP Planning Consortium	LPP01336	Policy 8C	Comment	The policy seeks to require all affordable housing to be retained <i>in perpetuity</i> ; this is not appropriate. The NPPF does not require all affordable housing to be retained <i>in perpetuity</i> , instead stating that it should “include	We will amend the policy to ensure compliance with the NPPF.

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				<p><i>provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision” (Annex 2 definition). It is only when defining rural exception sites does the NPPF mention affordable housing being retained <i>in perpetuity</i>. The Council’s policy should be amended to reflect this, as even with intermediate affordable homes can residents ‘staircase out’ to full ownership, and the Right to Buy will also remove affordable housing stock in the long term. The Government’s Proposed Changes to National Policy has also recently recommended changes to affordable housing policy, including that some models of affordable housing “<i>may not be subject to ‘in perpetuity’ restrictions</i>”. This policy should remove any reference to affordable housing being retained <i>in perpetuity</i>, focusing instead on transferring dwellings to Registered Providers at an appropriate cost.</i></p> <p>Further, we believe that the reference to replacing lost units with a replacement unit is not deliverable or justified and should be removed.</p>	
Worcestershire County Council, Planning Economy & Performance	LPPO1360	Policy 8C	Comment	<p>Under 'Rural Exception Sites', the first three words of part (i) should be deleted.</p> <p>Under 'Replacement Dwellings in the Open Countryside', part (ii) should refer to "curtilage only being amended if required", rather than "of".</p>	Comments noted.

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				Part (iii) should introduce the list with a colon, not a semicolon.	
Gladman Developments Limited	LPP01376	Policy 8C	Comment	<p>Strategy of accommodating development in Kidderminster and the market towns should not be at expense of meeting housing and employment needs of other settlements. The needs of the sustainable rural settlements should be assessed and meaningful growth apportioned to them to ensure their ongoing vitality and viability. Consideration of setting and character of a village must be balanced against the needs of the local community for new housing.</p> <p>In allocating sites, the Council needs to maximise housing supply by having the widest possible range of sites by size and location. Key to increased supply is the number of sales outlets offering a wide range of products and across different types of locations. It is vital that the evidence base considers how rural communities will sustain and enhance their sustainability over the plan period to avoid the risk of a negative approach that could directly lead to a decline in population and services.</p>	Comments noted.
Taylor Wimpey West Midlands	LPP01520	Policy 8C	Comment	No comments.	No comments necessary.
Wyre Forest Community Housing	LPP01659	Policy 8C	Comment	In the first paragraph in the Rural Exception Sites section, it states that the District Council “will work closely with.....” and then list various bodies / organisations. We would strongly encourage the	Comments noted.

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				inclusion of Registered Providers in this statement. Notwithstanding this, we agree with Policy 8C.	
	LPO2975	Policy 8C	Object	<p>The Local Plan Review proposes inflexible policy towards housing in rural areas.</p> <p>The local Plan Review seems to discredit and deny rural areas opportunity to contribute to housing mix by its narrow site approach, contrary to the approach advocated in NPPG guidance May 2016 Rural Housing. ‘ALL settlements can play a role in delivering sustainable development in rural areas (para 55 NPPG , Delivering a wide choice of high quality homes/paras 54, 55-), and so blanket policies restricting housing development in some settlements and preventing others from expanding should be avoided, unless their use can be supported by robust evidence’.</p> <p>For example boundaries to Callow End settlement exclude Fingerpost Cottage, which is probably one of the oldest houses in the locality. Houses developed on part of its former frontage have been included in the defined settlement of Callow End, but Finger Post Cottage was not.</p> <p>It is hoped that policy 8C of the Local Plan Review can be amended so as to provide a more robust and relevant consideration to housing development and include sites such as Fingerpost Cottage site in the plan for housing, providing for a real diversity of housing supply, so as to provide for rural housing need with a range of high quality homes, appropriate to the site and its locality as</p>	<p>Comments noted. As part of the pre-submission work we are reviewing village boundaries in non-Green Belt areas, such as Rock Parish. As a large part of the district is covered by Green Belt, we have commissioned consultants to undertake a Green Belt review. The Green Belt review has informed the site allocations and the policies within the emerging plan. Settlements washed over by Green Belt are constrained by Green Belt policy which limits the amount of development that can take place in these locations. Policy 8C does include Rural Exception Sites for affordable housing in Green Belt locations where this is deemed suitable and meets the criteria set within the policy.</p>

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				flexible spaces and homes for the future.	
	LPP02937	Policy 8C	Object	<p>Rural areas can contribute more to housing mix without detriment to landscape and sustainability. Government guidance considers rural housing essential to the sustainability and viability of local facilities. The LPR recognizes that Bewdley for example, as a local market town, provides local services that will be used by the surrounding local community. The existing rural community travels to Bewdley and supports this vibrant town. This may be associated with tourism but it also a significant reflection on the income levels of the surrounding rural area. The 40 houses on 2 sites at For Forest represent a concentration of new development, with the only additional contribution at Bliss Gate, of 5 houses, as the only small scale contribution to rural housing need. Sustainability, as NPPF indicates, includes widening the choice of high quality homes. Responding to different opportunities in different areas must be provided for by taking local circumstances into account. Particularly in relation to the provision of housing in the more expensive but rural parishes in the west of the plan area, such as Rock, by policy beyond that of 8C and settlement boundaries drawn up years ago- would these be a 'blanket policy' described by Rural Housing policy guidance as to be avoided?</p> <p>The Local Plan Review proposes inflexible policy towards housing in rural areas.</p>	Comments noted. We will support housing in rural areas with a demonstrable need and in sustainable locations.

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				LPR also seems to discredit and deny rural areas opportunity to contribute to housing mix by its narrow site approach contrary to the approach advocated in PPG guidance May 2016 Rural Housing. 'All settlements can play a role in delivering sustainable development in rural areas, delivering a wide choice of high quality homes', and so blanket policies restricting housing development in some settlements and preventing others from expanding should be avoided, unless their use can be supported by robust evidence'.	
Worcestershire County Council, Planning Economy & Performance	LPP01144	Policy 8C	Comment	<p>The policy begins by referring to "small scale residential development". This is currently ambiguous as to whether this is referring to market or affordable dwellings or a combination of both.</p> <p>The third sentence states that "Small scale residential schemes that take account of local housing needs on windfall sites will be proactively considered within the rural areas". It is unclear what "proactively considered" means. Would "positively considered" provide greater clarity if it is the intention that these sites would be looked upon favourably for a grant of planning permission (subject to meeting policy requirements, etc.)?</p> <p>Under 'Rural Workers Dwellings', part (iii) refers to the "financial capabilities of the enterprise". It is unclear what this means and this could benefit from some supporting text or a footnote to provide clarity.</p>	We will consider this amendment to the policy.

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	LPP01831	Housing for older people	Comment	Senior living apartment blocks should be developed in the town centre, encouraging people to downsize and freeing up larger properties. There are two large buildings in Kidderminster that would appear to be suitable for conversion to this type of living accommodation. Crown House and a large building in Worcester Street (formerly Council offices) are standing empty. There is also the former Glades site on which really nice living accommodation should be incorporated into any development that happens.	Comments noted.
	LPP04073	Housing Type	Comment	Retirement/low level housing: I would like to see on any development, particularly on Lea Castle, housing and a community for the elderly. A safe and secure complex with services for the elderly, shops, community centre, hair salon, doctors etc. A site of this nature would not necessarily have commuters at peak times, not impact on schools and local shops would mean no heavy impact on current supermarkets in the town. This may well have the desired effect for local elderly residents who currently live in 3/4 bedroom houses, who wish to downsize but do not want to leave the area, thus in the process freeing up current housing for families. If Lea Castle were to be expanded even with a good mix of this type of housing with other housing this would be a good way forward. We have a responsibility for affordable housing but we also have a responsibility to our ageing population to give them an opportunity to downsize but stay close (in a 'village') to where they have lived all their life, in a safe environment, easier to	Comments noted. We will ensure development on Lea Castle meets the range of affordable housing needs identified.

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				manage property (bungalow), with resources on their doorstep. Lea Castle is the perfect site for this. It will also create jobs and business opportunities.	
	LPPO4900	Policy 8D	Comment	<p>Housing objectives in the Kidderminster Central Area Action Plan, adopted in 2013 include the following:</p> <ul style="list-style-type: none"> • Increase the amount of people living within the town centre. • The elderly may want to downsize to smaller residential units which could free up family sized accommodation. Therefore, we need to ensure that residential development caters for all groups in society. <p>Objective assessment of housing need report says:</p> <p>‘Building properties designed for older people was overwhelming ranked the highest priority for Wyre Forest with 75% of respondents recognising this as a high priority and the remaining 25% a medium priority. Building affordable homes to rent was also recognised as important, with 63% of respondents ranking this as a high priority and 31% a medium priority. Building affordable homes to buy, including shared ownership or shared equity, was considered a medium to high priority, with 44% of stakeholders ranking this a high priority and 44% a medium priority. Building properties designed for people with specialist needs in the District was rated highly with 40% ranking this a high priority</p>	The OAHN revision should provide more detailed requirements for certain groups identified by the NPPF.

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				<p>and 60% a medium priority’.</p> <p>There seems to have been little regard for this in the preparation of the preferred options document.</p>	
Anonymous	LPPO5094	Policy 8D	Comment	<p>Agrees that in order for the area to prosper, we need to encourage working age families to the area so that there is a better balanced ‘Circle of Life’ in the area. This makes sense as there does need to be room to allow younger generations to come through and make Wyre Forest an aspirational place to live.</p> <p>Wyre Forest has an ageing population that most probably had young families 20-30 years ago. There is perfectly sufficient housing within Wyre Forest for young families, however, these family homes are not being vacated by the 45-64 & 65+ residents. There is a need to free up existing ‘family’ housing stock.</p> <p>There is a need for properties to be built to suit these groups of people. Not traditional bungalows, but properties that include: two parking spaces and a guest space; <i>some</i> garden; at least two spacious bedrooms; a bathroom each; a study/office area; a garage or outhouse building for garden items; some sort of separate utility. Essentially incorporating everything they already have, minus a bedroom and a smaller garden. The solution could be to create a different type of property that takes into account the items above?</p>	Comments noted.

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				<p>Given that Green Belt areas are being considered for development, perhaps modern barn complexes that look aesthetically pleasing across countryside views should be considered. These could be specifically designed, within courtyards, to be 2 bedroom properties that have a study on the ground floor (that could be used as a third bedroom), with a small area of private garden and an outhouse <i>storage/utility</i> attached. There would be two personal car parking spaces and plenty of communal guest parking centrally. Possibly 3-4 of these courtyards could form pockets of development to enable a community feel, avoid isolation and ensure it is economically viable to install utility / broadband services to each pocket of development. Whilst these modern barns would be relatively expensive however, relative to the equity saved up in a family home, the hope is they would be affordable to the target market, freeing the more affordable per square foot 'family homes' for younger generations</p> <p>While it is noted that the target residents would still be of a mobile age, some barns could be designed as single floor living; for example the ground floor being one apartment for those requiring no stairs and the 1st floor being accessed by stairs (or a lift dependent on cost).</p>	
	LPPO4656	Policy 8D	Comment	Much of the extra requirement for dwellings results from the aging demography, which requires targeted solutions:	Comments noted.

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				<p>The plan suggests that the occupation per household is falling with static population growth (Table 2.0.1) less than 20% between 20 and 39 years of age. The requirement for more affordable housing with fewer bedrooms is clear; this cannot be accommodated solely by new build. Other, more targeted, creative and exciting solutions are required, such as co-housing, where the community is central to the design of the living space (for example Marmalade Lane or 'Owch). These insightful developments could utilise land better and provide improved lifestyle for residents. Supported through tax breaks and grants, the oxygen of publicity, favourable planning consent, provision of lists of active groups and individuals in search of groups this would be a positive, proactive response to the demographic problem. Section 8 (Summary of Consultation Responses) shows great foresight and suggests a comprehensive review of specialist housing. Doubtless the Council has many other creative ideas (such as providing annexes for the elderly suggested in section 8.29) that can be explored.</p>	
Wyre Forest Community Housing	LPP01672	Policy 8D	Support	We particularly note and support the requirement within the Local Plan for “Housing for Older People and others with special housing requirements”.	Support is noted.
Taylor Wimpey West Midlands	LPP01521	Policy 8D	Comment	Requirement for developers to provide evidence that they have considered self/ custom build, difficult to achieve in respect of both making efficient use of land; and to achieve design consistency. Could impact on viability. Further work needed to find out where	A more detailed self/custom build policy will be included in the pre-submission document.

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				<p>households would like to undertake a self build, so policies can provide for need rather than asking developers of all large sites to offer land.</p> <p>Regarding evidence to demonstrate that housing development proposals have considered tenures and types and for the need for 540 residential units to be met on sites allocated for housing. The care accommodation industry is very different to the house building industry. On larger schemes care homes can be provided for, on smaller schemes it is more difficult to make a viable and meaningful contribution.</p> <p>Policy should be flexible in requiring such specialist development given the complexities. Likely that opportunity sites will exclusively come forward for homes for older people and/ or specialist housing, which may meet the needs identified.</p>	
Persimmon Homes Limited	LPPO1556	Policy 8D	Comment	<p>The Council has introduced a further new requirement as part of this policy relating to the provision of self-build housing. Introduced through the Self-build and Custom Housebuilding Act 2015, there is a clear mandate for Local Authorities to understand the scale and requirement for self-build properties to provide evidence for the demand for this type of housing. The PPG proposes that this is done through the compilation of a Self-build register</p> <p>The Council has not provided any evidence of the total</p>	The number of households on the register were included in the draft planning policy. A specific custom/self build policy will be included in the pre-submission documents.

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				<p>need for self-build properties in the District, it is currently unknown how much provision is needed for the purposes of the Local Plan. As the evidence base for the self-build register is not available, the Council’s justifications for this policy are unclear and unfounded. In the absence of credible evidence, the policy needs to be made more flexible in order for self-build to be included in the plan, though not to the prescriptive extent expressed in the current policy.</p> <p>Do not agree with the Council’s current evidence as part of this policy and would expect that this is given further consideration prior to submission, to ensure that the evidence is proportionate and takes into account local data.</p> <p>Housing for older people and others with special housing requirements should also be considered in viability reports for sites, which is not included in the current policy as it stands.</p>	
Summerfield Against Land Transformation	LPP01613	Policy 8D	Comment	<p>You make much of the proportion of older people in the District. Despite this, developers are only required to have “fully considered” such needs and you have a target of only 540 C2 units over the life of the Plan.</p> <p>Specialist housing for older people needs a greater commitment and C2 provision needs to be more ambitious.</p>	Housing for older people can be met through provision of a range of different tenures and types in addition to the C2 requirement.

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Gladman Developments Limited	LPPO1383	Policy 8D	Comment	<p>Note proposal to require consideration of self-build plots in major housing developments. Flexibility needs to be built in to ensure plots are not prevented from being developed as a result of low demand for such products.</p> <p>Intention to plan for C2 accommodation is welcomed. Specialist housing with care for older people is a type of housing which provides choice to adults with varying care needs and enables them to live as independently as possible in their own self-contained homes, where people are able to access high quality, flexible support and care services on site to suit their individual needs (including dementia care).</p>	Comments noted.
Persimmon Homes Limited	LPPO1434	Policy 8D	Object	<p>Acknowledge the need for all forms of housing where it can be demonstrated that provision is needed and is appropriate to that particular location.</p> <p>In the case of supported living, such provision should be regarded as fulfilling all or part of the affordable housing requirement for that particular site. Supported living accommodation is a specialist form of provision developed to meet the needs of those whose housing requirements will not be catered for by normal market or affordable housing provision.</p>	We will support the inclusion of supported housing on sites where it meets an identified housing need.
West Midlands HARP Planning Consortium	LPPO1337	Policy 8D	Comment	<p>It is recommended that the Council set out clearly what they mean by 'Housing for Older People' there are a number of different types of specialist housing for older people from 'age-restricted' housing to 'extra-care accommodation'. The common features of all four types</p>	The new OAHN will further identify housing needs for older people and this will be incorporated into the policy.

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				<p>are the age restriction, their specific design to meet the needs of older people, and a range of support services and shared spaces.</p> <p>Additionally the policy should explicitly support the development of specialist housing scheme which are separate to large scale housing developments. Example wording is provided below:</p> <p><i>“Homes for the elderly</i></p> <p><i>The Council will encourage the provision of housing for the elderly and for people with special needs, where appropriate whilst avoiding an undue concentration in any location.</i></p> <p><i>BDP10.2 The Council aims to ensure that older people are able to secure and sustain their independence in a home appropriate to their circumstances and to encourage developers to build new homes that can be readily adapted to meet the needs of those with disabilities and the elderly, as well as assisting independent living at home.</i></p> <p><i>BDP10.3 The Council will, through the identification of sites and/or granting of planning consents in sustainable locations, provide a wide range of elderly accommodation including the development of residential care homes, close care, ‘extra care’ and assisted care housing; and in particular Continuing</i></p>	

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				<p><i>Care Retirement Communities which encompass an integrated range of such provision.</i></p> <p><i>Sites should be sustainable by virtue of their location and there will be a preference for sites within defined settlements. Where such sites are not available regard will be paid to the potential for development to be self-contained to reduce travel requirements and the availability and accessibility of public transport.”</i></p>	
Wyre Forest District Council - Community Led Housing	LPPO1203	Policy 8D	Comment	<p>Support paragraph 1: ‘The local plan will seek to allocate plots for self build and custom build housing to address the demand for the self and custom build register. Provision will be reviewed on an annual basis as part of the residential land availability assessment and will be based on the demand as set out in the register of need maintained by the council.</p> <p>The District Council will require all major housing development proposals to provide evidence that they have fully considered the provision of self / custom build within the overall housing mix on the site’.</p> <p>Having analysed the self- build and custom-build register, key points for WFDC to consider:</p> <ol style="list-style-type: none"> 1. Out of the 50 individuals who are registered, a total of 36 are residents of the Wyre Forest district and therefore have a local connection. There are 16 individuals registered who do not 	There will be a specific policy on self/custom build in the pre-submission documents.

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				<p>have a local connection.</p> <ol style="list-style-type: none"> 2. Out of the 50 registered, a total of 34 would consider a custom-build plot / home that was part of a new build housing development 3. A total of 42 out of the 50 registered would consider the conversion of an existing building as an alternative to building a new property. 4. A total of 12 individuals have expressed their interest in building eco-friendly homes (as highlighted in the 'comments' field of the register <p>These figures reflect conversations with members of the public at the consultation drop-in sessions. There is real interest in town centre living and support the idea that empty buildings/old factories in around Kidderminster and Stourport centres could be considered for renovation as there is potential for bringing these empty buildings back into use and making them both affordable and desirable places to live.</p> <p>To support the consultation sessions, the register also demonstrates that 42 out of 50 individuals registered 'would consider the conversion of an existing building as an alternative to building new property.' If these can be prioritised it would reduce the amount of Green Belt land that will be required to meet future housing needs. The sticking point is likely to be 'location' but if empty</p>	

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				<p>buildings were converted, they would appeal to those people who want the benefits of living in a central and accessible location, but without the high rents that can be associated with it. More town centre living would help make the town centre feel safer at night time, increase the night time economy and help support the newly established restaurants opening in the town centre.</p> <p>The self build / custom build register is a live portal and strongly support that the register be reviewed annually. As content for the WFDC website is created it will likely generate more interest and support for community-led housing as local people gain a better understanding about the umbrella term for ‘community-led’ and what it could mean for them.</p> <p>Hope that WFDC would be able to make a tangible offer to the self-build / custom build community and offer plots that could be considered for their projects. In time, there may be interest generated in a housing co-operative, co-housing or self-help housing. As it is a relative unknown in terms of where and if this might happen, it is hoped that the housing needs of all Wyre Forest residents could be taken into account and supported, despite there not being a definite timescale for when it might happen.</p>	
Bewdley Civic Society	LPPO843	Policy 8D	Support	Policy 8D Specialist Housing Requirements: BCS supports this policy but with a more sympathetic	Comments noted.

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				approach to annex accommodation not only for carers but also for family members who perhaps cannot find suitable accommodation and wish to live together as an extended family under one roof.	
Miller Homes	LPP0974	Policy 8D	Object	<p>Object to the requirement set out within Policy 8D requiring all major housing development proposals to provide evidence that they have fully considered the provision of self / custom build dwellings, bungalows, sheltered housing, extra care units and other types of supported housing within the overall housing mix on the site.</p> <p>Our client recognises that the Self Build and Custom House Building Regulations 2016 requires Wyre Forest District Council (WFDC) to have regard to a register of people who are interested in self build or custom build projects in the area and that the Planning Practice Guidance (PPG)1 specifies that Local Plans should consider the size, location and quantity of dwellings needed within the area to allow older people to live independently and safely in their own home for as long as possible. However the Local Plan Policy wording and supporting text justification do not explain what a housebuilder needs to do in order to fully consider the provision of the identified housing types, introducing ambiguity and uncertainty into the application of this policy requirement.</p> <p>1 PPG Para 021 Reference ID: 2a-021-20160401.</p>	Comments noted.

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	LPPO306	Policy 8D	Support	I support draft Policy 8: Accommodation for Family Members and Carers, but it would be strengthened by the addition of “and Dependant Relatives”	Comments noted.
Homes England	LPPO815	Policy 8D	Support	The Council require development proposals to fully consider the provision of self/custom build within the overall housing mix on site. However, in relation to housing for older people and specialist requirements, it is considered that the policy needs to be clearer as to what it means by “...proposals to provide evidence that they have fully considered the provision of the following tenure and type within the overall housing mix on site.” The policy needs to provide clearer guidance as to what evidence the Council required, as currently this statement is open to interpretation.	This policy element will be revised once we have undertaken the revised OAHN which will include greater identification of the needs of older people.
Chaddesley Corbett Parish Council	LPPO1034	Policy 8D	Comment	<p>The provision of care homes and sheltered/extra care units needs close collaboration with County-level Social and Health services; they should have a clearer picture of the scale and type of provision needed. For residential and nursing care, there may be benefits in encouraging more purpose-built properties as well as conversions.</p> <p>Linking the provision of sheltered/extra care units to specific/separate developments may lead to pepper-potting (scattering) of these facilities, which may not be the most suitable or effective way of providing or supporting these properties. Again, Social and Health care input would be beneficial.</p>	Comments noted. We work closely with Commissioning Managers at WCC in meeting supported housing needs.

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Worcestershire County Council, Planning Economy & Performance	LPP01145	Policy 8D	Comment	<p>This policy would benefit from being divided into two, with Policy 8D concerning self-build and custom housing, and a new Policy 8E on housing for older people and others with special housing requirements (with consequent amendments to policy numbering for the current Policy 8E and 8F).</p> <p>We welcome the policy's requirement for all major developments to consider bungalows and extra care needs within the overall housing mix. Specific policy support for accommodation for family members and carers is also welcomed.</p> <p>Specific support for those with disabilities should also be included in this policy.</p> <p>We would, however, encourage the Local Plan to require all new housing, or a proportion of new housing, to be built to design standards that allow people to remain in their own homes for as long as possible. The majority of people prefer to remain in their own homes as they grow older, where necessary making changes and adaptations to their properties should their needs change. New homes should be encouraged to meet the Lifetime Homes standard (www.lifetimehomes.org.uk/) which is intended to allow homes to meet changing needs over the course of people's lives. The application of such standards to new build properties can help to realise some older people's aspirations to stay in their homes for longer.</p>	<p>Agreed.</p> <p>There is currently provision for lifetime homes and this will be updated in line with any national guidance.</p>

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	LPP04726	Policy 8E	Comment	Gypsy sites are always a problem and I don't have any quick fix for this except to say that both options look reasonable although it may not appear so to local residents and businesses.	Comments noted.
	LPP0742	Policy 8E	Comment	Comments made confidentially on behalf of a client.	Comments noted.
Worcestershire County Council, Planning Economy & Performance	LPP01361	Policy 8E	Comment	The text at the end of the policy should refer to "medium-term needs up to 2020".	Comments noted.
Historic England	LPP01270	Policy 8E	Comment	Policy 8E relates to potential development sites for Gypsy and Traveller Accommodation - what assessment has been undertaken as to the impact for the historic environment? How will these issues and opportunities be included within the Plan? This comment also relates to Policy 8F.	A Heritage Impact Assessment Study is being prepared and will be published at pre-submission stage. This study considers the sites and the potential heritage impacts. The purpose of the Heritage Impact Assessment is to support the Local Plan by demonstrating how the historic environment has been considered in the site selection process and to assess the likely impact on heritage assets, (both designated and non-designated) and whether any impact can be mitigated.
National Federation of Gypsy Liaison Groups	LPP03349	Policy 8E	Object	Restricting sites to those which are "on previously developed land or in areas allocated primarily for residential development subject to all relevant policies" will effectively prevent any sites being acceptable since	Comments noted.

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				sites which comply with this restrictive policy will be equally acceptable for mainstream housing and will thus inevitable be beyond the reach of Travellers.	
	LPPO3540	Policy 8E	Comment	I would also like to say that any proposals regarding the travelling community for further sites in the future should be done in Kidderminster, Bewdley or any other areas in Wyre forest except for Stourport as i feel that Stourport has already done their provision and other areas need to step up if any more sites are needed	Comments noted.
	LPPO3542	Policy 8E	Object	Park home sights, classed in your mandate as Caravan and Holiday sights. It is with interest that you are committed with venom NOT TO ALLOW, 12 months occupation of these dwellings. You point out that the elderly could down size, surely these dwellings are ideal for the older population, but because of the Shutdown of the sights yearly, it is neither viable, ideal or cost worthy to vacate a family home for this option.	Caravan and holiday sites are not seen as appropriate long term housing solutions due to the insecurity of residency.
Worcestershire County Council, Planning Economy & Performance	LPPO1146	Policy 8E	Comment	The text at the end of the policy states that "Further small scale sites to meet the indicative need of 21 pitches to 2034 will be allocated in the Local Plan". Should the preferred options not seek to meet identified needs at this stage? There doesn't seem to be any evidence of why these additional pitches have not been identified.	Current need for pitches provision has been met. A revised GTAA will be undertaken in the future to form the evidence base for need requirements.
Taylor Wimpey West Midlands	LPPO1523	Policy 8F	Comment	No comments.	No comments necessary.
	LPPO3114	8.0.6	Object	This plan is contrary to previous planning advice. Access	Objection noted. The proposed sites

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				<p>will cause an extra hazard on an already very busy road. Local business will suffer, particularly the hotel.</p> <p>Wribbenhall schools are already overcrowded, and showpeople's children will need places there.</p>	<p>continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
	LPPO3111	8.0.6	Object	<p>This plan is contrary to previous planning advice. Access will cause an extra hazard on an already very busy road. Local business will suffer, particularly the hotel.</p> <p>Wribbenhall schools are already overcrowded, and showpeople's children will need places there.</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
	LPPO2208	BR/RO/1	Object	<p>Objects to BR/RO/1 as a potential site for travelling show people.</p> <p>Believes the site is unsuitable because some years ago the yard was subject to a Public Inquiry as it has been created without the necessary permissions being obtained.</p> <p>Responsible authorities do not appear to have enforced the resulting directions of the Public Inquiry. There is a belief that the original construction was undertaken by using unsuitable materials including scrap vehicles.</p> <p>The land is unsuitable as a parking place for large numbers of heavy vehicles.</p> <p>As an alternative, there are former factory sites in</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>Stourport and Kidderminster which would be eminently more suitable for the proposed use, having been properly constructed and more accessible.</p> <p>Problems with main drains in Clows Top - currently residential and business premises have no access to main drains - the dependence on septic tank drainage has caused the local authority to impose conditions on any proposed residential developments that any new builds would need to be connected to main drains.</p> <p>Therefore, the increased use/occupation of this site would necessitate the requirement for appropriate foul drainage provision in line with the local authority requirements to prevent any hazardous environmental damage being caused.</p> <p>Traffic - this has increased in recent years. Pavements provision in this part of the village is less than adequate with an interrupted pavement on only one side of the road. It is hazardous enough at the present time and any increase in the levels of danger and inconvenience to pedestrians and other road users would be unacceptable.</p> <p>Any Local Plan should address the real Community issues that exist, rather than create more detrimental ones.</p>	
	LPP02146	BR/RO/1	Object	High volume of traffic that passes through the cross	Objection noted. The proposed sites continue to be evaluated to identify the

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				roads. Insufficient facilities to cater for travellers community, no school doctors etc.	most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO2149	BR/RO/1	Object	The large increase in traffic both leaving and joining the carriageway in the close vicinity of the busy crossroads which already has bad visibility and is an accident hotspot. In my opinion a site of this type and of this density will cause levels of noise and disturbance that will result in infinite complaints from the surrounding residents Detrimental to the area	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO2215	BR/RO/1	Object	Objects to BR/RO/1, Section 19, Clows Top due to the following reasons: <ul style="list-style-type: none"> • It is dangerous for vehicles, especially large lorries at the crossroads. • The footpath opposite the site is already damaged - when the lorries using it now leave and enter the site they have to go on to the opposite footpath to be able to get on to the road. This has an impact on local residents who have to use the footpath with potholes. • Safety - if fairground lorries and their families reside there, access onto the A456 by children should be considered. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<ul style="list-style-type: none"> • The ability to manoeuvre trailers, caravans and lorries, crossing the carriageway of the A456 to get on site. • Sewerage - would it be that the families would have to be responsible to get their sanitation needs onto a septic tank set up, how would that work? • Electricity - would dwellings have to be put onto the normal power supplies? • Drainage - where would all the sink and bath water waste be directed? • As a local resident, all of the above issues have presented problems. • 9. Clows Top water is dependant on the pumping station just outside the village at the bottom of the bank towards Bayton. As soon as there was anything like a problem, Clows Top water was first to stop. Extra families drawing from that would not help. • 10. Any sort of housing is going to put a strain on the facilities as it stands at the moment but if housing has to happen then let it be a sensible amount of houses on the right sanitation set up, with sensible access to the A456. That way the village of Clows Top will remain just that a “village”. 	
	LPPO2379	BR/RO/1	Object	<p>Object to the Clows Top site for Travelling Showpeople:</p> <ol style="list-style-type: none"> 1. Increase in traffic, especially heavy vehicles 2. Dangerous site access 3. Noise pollution 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission</p>

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				<p>4. Who would be responsible for the site and limit its use as req'd</p> <p>Personal perception that unlike the local residents, people using the site would have no shared interest in improving the area.</p>	documents.
	LPPO2399	BR/RO/1	Object	<p>Object Travellers/show people site at Clows Top:</p> <p>Understand land has to be made available but this road is unsuitable and would be dangerous for more traffic; crossroads are already hazardous.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO3300	BR/RO/1	Object	<ul style="list-style-type: none"> • The cross roads on the A456 are already dangerous because of the volume of traffic. • The roads at this point are too narrow to allow such vehicles to turn into or out • The hill approaching the site from Bewdley is very steep with a very limited view of oncoming traffic. <p>The alternative use of this site to allow a limited housing development would be viable if the sewage problems could be solved.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO3447	BR/RO/1	Object	<ol style="list-style-type: none"> 1. No main sewage in the in village. 2. Major traffic hazard. 3. Impact of local facilities by influx of additional people. 4. Inadequate electricity supply. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission

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				<p>5. Your map incorrect on some details.</p> <p>Land on the site is unsuitable land likely to break up with any heavy-weight vehicle or new building.</p>	documents.
	LPPO3500	BR/RO/1	Object	<p>We object to the proposed Traveller, Show people and Gypsy Site at Clows Top.</p> <p>The land at Clows Top has already been disregarded as a potential Traveller, Show people and Gypsy site in previous consultations. Access to and from the site would result in the crossroads becoming more dangerous.</p> <p>We understand the site has already been considered for residential use and as a former garage site the land is probably contaminated. The cost of dealing with this should be borne by potential developers, as should the cost of providing sewage and storm water systems.</p> <p>We understand that Travellers and gypsy communities prefer to be located near good transport systems, doctors and schools.</p> <p>We are sure there is no support from Rock Parish Council or the local community for Travellers, Show people or Gypsies to be located on the land at Clows Top.</p> <p>We support residential building on this site which we</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				think would help sustain this village and local community.	
	LPPO3501	BR/RO/1	Object	<p>We object to the proposed Traveller/Show People and Gypsy Site at Clows Top. The land has already been disregarded for this use in previous consultations.</p> <p>Clows Top needs more affordable housing. This would encourage local young people to stay in the village and keep this community alive and help to sustain local businesses such as the village store, post office and butchers.</p> <p>Access to and from the site would result in the crossroads becoming even more dangerous crossroads and access to the current car park is wholly unsuitable for large, slow moving vehicles. Changes to the road infrastructure would be costly and would cause traffic problems. Works relating to a housing development should be carried out and paid for by the developer.</p> <p>As a brown field site, there is likely to be significant ground remediation before any development can take place. This should be paid for by a developer, as should the cost of providing a sewage and storm water system</p> <p>As you will be aware there is a government incentive to build more new homes where deferred infrastructure charges relating to new water connections are waived, provided that new homes meet strict water usage criteria. This would be a significant and unavoidable cost</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>born by tax payers if the development is not designated for new homes.</p> <p>We understand that travellers and gypsy communities prefer to be located near better transport systems, doctors and schools, which are not present at Clows Top.</p> <p>We are sure there is no support from Rock Parish Council or the local community for Travellers, Show people or Gypsies to be located on the land at Clows Top</p> <p>We would support for residential building on this site which we would help sustain this village and local community. Clows Top needs more affordable housing. This would encourage local young people to stay in the village and keep this community alive and help to sustain local businesses, as has happened in other villages.</p>	
	LPPO4318	BR/RO/1	Object	<p>Objects to further development and traffic at Clows Top. It has become increasingly busy and the crossroads at the top can be quite a challenge to negotiate, further traffic near the junction is sure to make the situation even worse.</p> <p>Suggests the land under discussion would be better served to the community as it is i.e. a garage or similar which would offer a service which would benefit residents.</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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	LPPO4320	BR/RO/1	Object	<p>The proximity of the site the crossroads at Clows Top are quite dangerous and a lot of heavy vehicles using them.</p> <p>There are no services such as schools, doctors, dentists in the immediate vicinity and the winters can be hard.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO4321	BR/RO/1	Object	<p>close to the crossroad junction and the 456 is well used by heavy traffic</p> <p>no local police or hospital so there could be a wait for rescue services</p> <p>lack of employment schools medical requirements</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO4322	BR/RO/1	Comment	<p>I have to support the dual allocations for the land. Although it is of course preferred to become a small housing development and in-keeping.</p> <p>This (housing development) is indeed supported by the majority of all within the village parish.</p>	Comment noted.
	LPPO4325	BR/RO/1	Object	<p>The yellow shading delineating the area in question at Clows Top is not entirely accurate.</p> <p>I think the housing option would be more beneficial to the local community.</p> <p>If travelling show people were to use the site their heavy vehicles would probably damage the road.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>There would be extra traffic, large vehicles turning in and out of the site onto as busy road/steep hill.</p> <p>Sewerage and water supply would be a problem.</p>	
	LPP0667	BR/RO/1	Object	<p><u>Old transport yard, Clows</u></p> <p>Objects to site due to:</p> <ul style="list-style-type: none"> • site at summit of steep hill and dangerous crossroads - not suitable for heavy vehicles • adjoining land recently bought by builder - proposal would make sale of homes harder • sewage - not on mains • noise and light pollution • electricity - overhead cables - issues with strong winds • environmental waste from site not wanted • horses not welcome <p>Personal perception that there may be security concerns for shops and homes and a belief that property would be even harder to sell.</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
	LPP0668	BR/RO/1	Object	<p><u>The Old Transport Yard off A456, Clows Top</u></p> <p>We do not want permission given for this site to be allowed for travelling/show people in our hamlet due to</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be</p>

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				<p>the following points:</p> <ul style="list-style-type: none"> • Infrastructure - no mains sewerage, low water pressure and old pipes, increased run-off/drainage, busy road frontage near crossroads, on steep hill. • pollution from trucks/trailers, damage to road surface, noise and light pollution, unreliable electricity supply, extra waste • Personal perception that there may be issues around security and potentially increased costs to local residents • A perception that the new owner of adjacent site will have problem building/selling houses <p>Concern that there may not be enough school provision and transport.</p>	included in the pre-submission documents.
	LPP04666	Ceram-aspeed	Comment	This site isn't ideal because it is close to existing houses.	Comment noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP01713	Clows Top	Object	<p>Objecting to travelling show people or houses being developed at Clows Top for the following reasons:</p> <ul style="list-style-type: none"> • Drainage - Clows Top houses not connecting to mains sewer and relies on septic tanks so an 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>influx of residents would not be suitable.</p> <ul style="list-style-type: none"> • Road Safety - access to the site is at a very narrow point in the road and on the brow of the hill so has poor visibility. Issues with the current entrance being suitable for access, particularly for slow, heavy vehicles, which have potential to cause damage to vehicles opposite as well as mounting the pavement which is a safety issue for pedestrians. Drivers already break the 30mph speed limit on the road. • Inadequate Utilities - due to being a remote location and the local topography electricity and water supply is often disrupted which will be affected further if additional requirements are added to the systems. • Stability of the Land - site is in a poor state of repair; worried without major work to stabilise the ground it could fall away if used by heavy vehicles. 	
	LPPO2076	Clows Top	Object	<ol style="list-style-type: none"> 1. The turning for proposed site is on the brow of the hill on a road with a 30mph; large slow moving vehicles would be a traffic hazard and add to pollution. 2. There is no provision for sewerage 3. Property value will decrease. 4. Site already put forward and refuse in 2010; nothing changed. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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	LPPO2086	Clows Top	Object	<p>Unsuitable for a travelling/show people site; no mains sewerage and septic tanks could not be provided.</p> <p>Fairground lorries would create pollution/noise and poor access will result in traffic tailbacks/dangerous driving conditions.</p> <p>This site was deemed unsuitable at the last consultation what has changed?</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO2127	Clows Top	Object	<p>I strongly object to the proposal in policy 8F regarding the site at the rear of the village hall potentially being used for travellers and show people.</p> <p>Firstly, there is no mains sewage in the village of Clows Top and septic tanks would be highly controversial in that site as there is a runoff from this land into Dumbleton Brook on the opposite side of the road leading down to Pensax. This brook runs into a SSSI site.</p> <p>We have no schools, doctors, street lights, public transport to speak of. The electricity supply to Clows Top regularly fails due to poor infrastructure.</p> <p>Very poor access to this for large vehicles, as site at top of the steep hill where smaller vehicles approach at speed.</p> <p>The actual land itself is unstable and is likely to subside</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>with constant heavy traffic.</p> <p>In harsh winters, the village can be almost cut off to large vehicles</p>	
	LPPO2128	Clows Top	Object	<p>I object to the proposal in policy 8F regarding travelling show people on land at former Clows Top village, Clows Top.</p> <p>Access and roads – the only current access is directly onto the A456 on the top of a blind hill. A known danger spot at all times of year and which can be completely impassable in winter. Large vehicles pulling slowly out would be extremely dangerous.</p> <p>Lack of facilities and amenities – the villagers already struggle with insufficient amenities – there are no street lights for safety/security and the current electricity supply cannot cop with the existing demand with very frequent power cuts.</p> <p>The mains water supply is insufficient.</p> <p>There is no mains sewerage facility.</p> <p>There is no public transport to speak of.</p> <p>There is no doctors surgery, school, college, or opportunity for employment. Other than the village hall there is no entertainment (pub/cinema/park) for adults</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>or children.</p> <p>Clows Top is a small rural village and the introduction of a group of travellers could seriously impact the demographic make-up and feel of the village and community. This is a country village not an industrial site or car park for wagons.</p> <p>Noise – living across the crossroads and downhill from the proposed location, there is a big risk of significant noise pollution.</p> <p>Instability of land – there are indications that due to the previous use of the land, that the whole area is unstable and has insufficient drainage.</p> <p>We would want thorough investigations into any potential drainage into the stream on our property which runs into a registered SSSI site.</p>	
	LPPO2209	Clows Top	Object	<p>Objects to BR/RO/1 as a potential site for travelling show people.</p> <p>Believes the site is unsuitable because some years ago the yard was subject to a Public Inquiry as it has been created without the necessary permissions being obtained.</p> <p>Responsible authorities do not appear to have enforced the resulting directions of the Public Inquiry. There is a</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>belief that the original construction was undertaken by using unsuitable materials including scrap vehicles.</p> <p>The land is unsuitable as a parking place for large numbers of heavy vehicles.</p> <p>As an alternative, there are former factory sites in Stourport and Kidderminster which would be eminently more suitable for the proposed use, having been properly constructed and more accessible.</p> <p>Problems with main drains in Clows Top - currently residential and business premises have no access to main drains - the dependence on septic tank drainage has caused the local authority to impose conditions on any proposed residential developments that any new builds would need to be connected to main drains.</p> <p>Therefore, the increased use/occupation of this site would necessitate the requirement for appropriate foul drainage provision in line with the local authority requirements to prevent any hazardous environmental damage being caused.</p> <p>Traffic - this has increased in recent years. Pavements provision in this part of the village is less than adequate with an interrupted pavement on only one side of the road. It is hazardous enough at the present time and any increase in the levels of danger and inconvenience to pedestrians and other road users would be</p>	

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				<p>unacceptable.</p> <p>Any Local Plan should address the real Community issues that exist, rather than create more detrimental ones.</p>	
	LPPO2649	Clows Top	Object	<p>Please register my objection to the use of the above site by travellers/show people. There are no facilities to house anyone on that land.</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
	LPPO2764	Clows Top	Object	<p>Objection relates to any part of the document (e.g. paragraph, policy, map, and table or figure reference) where the site at Clows Top is shown or proposed as potential site for Traveller, Showpeople, and Gypsy use.</p> <ul style="list-style-type: none"> • Proposed site is in contravention of government policies: This proposal is in direct contravention of various components of the government guidelines, policies and previous statements made by the WFDC on this matter. • The land at Clows Top has already been disregarded as potential Traveller site: In 2011 the land at Clows Top was shortlisted as a site to be further investigated. After much debate and opposition of the local community the Clows Top Garage site (former Old Transport Yard) was confirmed as not suitable and not available as potential site for Gypsies, Travellers and Travelling Showpeople and was therefore 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>disregarded from any future considerations by the WFDC. Circumstances regarding availability have not changed. It is our understanding that the current owner of the Clows Top Garage site is seeking to renew the planning permission for housing with a potential of approximately 30 dwellings.</p> <ul style="list-style-type: none"> • Land at Clows Top is not suitable for use as Traveller site: Central government policies and guidelines state that when identifying Traveller sites consideration must be given to the relationship of the site to the surrounding community. The site should not be located on contaminated land nor have unacceptable impact on the landscape or have adverse impact on the health, safety, and living conditions, be sustainable, supporting the lifestyle of the residents of these sites, offering access to facilities and scope to manage an integrated coexistence with the local community and the environment. Similar provisions can be found in the local policies and guidelines of WFDC. These criteria make it unlikely for the land at Clows Top to be utilised as such for a multitude of reasons. The site is neglected, has a public footpath, is possibly contaminated and does not have provisions in place to safeguard visual and acoustic privacy. Surface water drainage and storm water drainage must be installed but the foul drainage connection is at some distance 	

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				<p>away in Rock.</p> <p>Access onto the A456 for use as Travellers site is poor. Not suitable for large show and fairground vehicles and equipment enter and exit the site. Commercial vehicles would be entering and leaving the proposed site at all hours, including night time. There is increased noise transference on main roads such as the A456, resulting in disproportionate nuisance and high noise disturbance to the wider community. For the same reason, this usage is not conducive to the health of the residents living in mobile homes even more so if joint commercial/residential use is envisaged.</p> <p>Many Gypsies and Travellers express a preference for a location that is on the edge of or closely located to a large town or city consistent with traditional lifestyles and means of employment. There is only one bus service from Tenbury Wells to Kidderminster, which is a limiting factor for employment. Furthermore, there is no easy access to General Practitioner and other health services.</p> <p>There is no aesthetic compatibility with the local environment. A Traveller site at Clows Top would not be in keeping with the local environment.</p> <ul style="list-style-type: none"> • It is not feasible to develop the land at Clows Top as Traveller site: service water drainage and storm water drainage is not present and 	

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				<p>installing these facilities would cost at least £800,000 in addition to the costs of clearing up the heavily neglected site. These costs would largely be picked up by developers if it the site would be used for much needed housing development. In order to connect the sewage to Rock or Bayton all involved property owners would in principle need to agree to this and be compensated for the pipes going over their land. It is difficult to see how public support can be attained to make the land suitable for Travellers regardless of whether or not the same site could also be developed for much needed housing. There is a potential for approximately 30 dwellings if this site would to be used for housing development.</p> <p>The prevailing and emerging policies for Traveller, Travelling Showpeople, and Gypsy use state that any site should have adequate access to services and utility infrastructure such as mains water supply and mains electricity. Appropriate arrangements for sewerage treatment must be submitted as part of the application in addition to satisfactory drainage measures. The prevailing and emerging policies for housing list the criteria under which residential development will be permitted. One of the criteria is that the developer must ensure that appropriate sewage/drainage measures are provided.</p>	

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				<p>The emerging Local Plan policy 8F proposes that to meet the immediate needs of Travelling Showpeople within the District the land at Clows Top should be considered as a potential site for this use and that following allocation, any proposals brought forward should submit suitable arrangements for sewerage treatment in addition to satisfactory drainage measures. As Traveller sites are essentially a residential use, applicants will be required to demonstrate that they have sought a connection to the mains foul sewer in the first instance.</p> <p>The same requirements that apply to residential development must also be met for allocation of a site for Traveller, Showpeople or Gypsy use. Even if exceptions to some requirements could be made to meet the immediate needs of Travelling Showpeople, which we fail to see how this would serve the interest of the local community and, why residential requirements should be eased in any case. Even if certain requirements could be eased this use would be neither suitable nor feasible or attain public support.</p> <p>Policy 8F should be formulated in a way that necessary conditions should be met prior and not subsequent to such an allocation as a site can only qualify as appropriate if all requirements are met. It should also clarify that the same requirements that apply to residential</p>	

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				<p>development such as appropriate drainage measures should also be met when allocating a site for Traveller, Showpeople or Gypsy use. If there is a willingness to lower certain standards for this particular use then the standards for housing development should be lowered equally.</p> <p>The prevailing policy <u>DPL10</u>, should also be incorporated in the equivalent emerging <u>policy 19</u> or separately adapted and continued, as this policy contains certain requirements to safeguard appropriate granting of planning permission for this use which have not been incorporated in the aforementioned emerging policy.</p> <p>Given the history and the way this policy is formulated, the impression is created that the intended use is justified by the policy instead of the other way around and that the conflicting potential secondary purpose (Potential Site for Travelling Showpeople) is in reality the primary and currently only purpose (Core Housing Site). Plan Policies are in place not only to guarantee that due process is followed but also to ensure that the limited land and local tax revenues are allocated appropriately. If a short cut is taken in formulation or application one is essentially passing on the immediate allocation issue of one local community to another.</p> <p>If WFDC is serious the about designation of the</p>	

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				<p>land at Clows Top as Core Housing Site, then it would be a good idea to coordinate their efforts with The Malvern Hill District Council, which has approved the erection of 30 dwellings adjacent to the A456, and stimulate the process of cooperation between the involved landowners/developers, Severn Trent and the environmental agency to ensure that the appropriate drainage measures are installed.</p> <ul style="list-style-type: none"> • Other locations are (more) suitable for use as Traveller site • There is no local support for the use of the land at Clows as Traveller site: Due consideration must be given to the relationship of sites to the surrounding community. It is important to ensure that proposals to develop a site link in with other broader strategies in place for improving community cohesion and be regarded as a key issue within them. <p>We have seen no evidence of concrete broader strategies in this case promoting to improve community cohesion. There is an immediate housing need, which requires a quick solution. Furthermore, the established community has made it overwhelmingly clear by attendance at public meetings and voicing their opinion in various ways for the past 5 years that they do not wish this community cohesion forced upon them. Many members of the community attended the last Rock Parish Council Meeting</p>	

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				<p>on 31 July 2017 to express their opposition and frustration regarding the proposed Traveller site at Clows Top. The Rock Parish Council has also objected in disbelief to the land at Clows Top being in consultation for this use again.</p> <ul style="list-style-type: none"> • Earmarking the land at Clows Top as Traveller site is in contravention of WFDC broader strategy on sustainability: The emerging Local Plan objectives insofar here relevant are to encourage the long-term sustainable development of Wyre Forest District and its communities and to address housing needs in order that the existing and future residents requirements are met and the economic development of the area is supported. In the emerging Local Plan the allocation of the land at Clows Top as Core Housing Site is confirmed. The broader strategy for accommodating growth in the Wyre Forest Area behind option 7 by allocating more development to the villages and settlements within the District's Rural West is explained further. The consideration of the land at Clows Top as a potential site for Traveller use in the aforementioned emerging Local Plan policy 8F is in contravention of policy 35 and WFDC broader strategy on housing development and community cohesion. If WFDC surrenders the only available and sustainable allocated land in the WFD in this village to this proposed 	

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				<p>secondary purpose it does not support the broader strategies of WFDC for housing development and communities cohesion in Clows Top. In the assessment of the potential sites for this use the WFDC has recognised that the land at the site at Clows Top is at the heart of a remote rural village, that there is poor public transport links to local urban centres and that such a use does not fit in with the requirements of their Core Strategy.</p> <ul style="list-style-type: none"> Earmarking the land at Clows Top as Traveller site would disjoint this small settled community: In one form or another, all central government policies express that the interests of the settled community must be respected and local amenities as well as local environment protected. Local planning authorities should ensure that any Traveller site to be considered is sustainable economically, socially as well as environmentally and avoids placing undue pressure on local infrastructure and services. Similar provisions can be found in the local policies and guidelines of WFDC. Clows Top is a small village with about 20 dwellings in Rock Parish and about 60 dwellings in Bayton Parish. It simply does not have the infrastructure to support this usage. It would completely dominate the settled community. From this perspective alone, it follows that the site at Clows Top should not be considered now 	

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				<p>or in the future as potential location for Travelling Showpeople or Gypsy use. Such a usage is not and cannot be made sustainable and would have a destabilising and disjuncting effect on this small settled community. Such a usage would also have an unacceptable impact on the landscape and townscape as well as maintaining and enhancing the community identity. Therefore, the site at Clows Top is not a viable option for this purpose.</p> <p>Conclusion</p> <p>In conclusion, the land at Clows Top is not available nor suitable for this use and it is not feasible nor deemed good governance or socially desirable to develop it for this purpose. Such a purposing is in direct contravention of various components of several local and central policies and government guidelines, not in the least of which WFDC broader strategies for housing development and community cohesion.</p> <p>We trust we have provided sufficient grounds:</p> <ul style="list-style-type: none"> • to disregard the land at Clows Top from any future considerations as a potential site for Traveller, Showpeople or Gypsy use and thus to reject the potential dual purpose of this land (Core Housing Site or Potential Site for Travelling Showpeople) and maintain the single purpose of 	

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				<p>Core Housing Site</p> <ul style="list-style-type: none"> • or alternatively to reformulate the emerging Local Plan policy 8F and other related policy items such as paragraph 8.40 in a way that it is clear that the necessary conditions need to be met prior and not subsequent to an allocation for Traveller, Showpeople and/or Gypsy use and that the same requirements that apply to residential development such as that appropriate drainage measures must also be met for allocation of a site for Traveller, Showpeople or Gypsy use or if there is a willingness to lower standards for this use then equally lower the standards for housing development as this will - in the event the Local Plan policy 8F is adopted - still be the preferred use. 	
	LPPO2815	Clows Top	Object	<p>Strongly objects to the land at Clows Top being classed as a potential site for Travelling Showpeople:</p> <ul style="list-style-type: none"> • Access in and out of the site for large vehicles and cars towing caravans - entry and exit to the site dangerous • Sewer system - Building land is very hard to source in rural areas. Clows Top has no mains sewer which is the reason this land has never been built on. The village would like this matter resolved so the village can have some affordable 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p> <p>The site is for just one family who are already resident in the District.</p>

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				<p>housing for the young of the village. Do Travelling Showpeople not need connection to a mains sewer? If the answer to this question is no they do not need mains sewer then please explain why we cannot build houses on the land under the same rule?</p> <ul style="list-style-type: none"> • Unstable land - As with most brownfield sites it does need clearing up. What controls will be put in place to ensure the site is cleared and tidied as per regulations. The bank is slipping onto the footpath, if large vehicles are parked on the site the slippage would get worse and houses below the site could be at risk. If the land is used for building the site would have to be cleared according to laws in place at that point in time. • Occupation of Land - Your consultation does not state how many Travelling Showpeople families would live on the site. The impact of Travelling Showpeople on the village is unknown as the number of families wishing to use the site is unknown. <p>We would like to see affordable homes built in Clows Top so the young of the village and surrounding areas can stay where they were brought up and live near to their relatives.</p> <p>We strongly object to the use of the land as a Travelling Showpeople site.</p>	

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	LPPO2919	Clows Top	Comment	<p>Objects to BR/RO/1 as a potential site for travelling show people.</p> <p>Believes the site is unsuitable because some years ago the yard was subject to a Public Inquiry as it has been created without the necessary permissions being obtained.</p> <p>Responsible authorities do not appear to have enforced the resulting directions of the Public Inquiry. There is a belief that the original construction was undertaken by using unsuitable materials including scrap vehicles.</p> <p>The land is unsuitable as a parking place for large numbers of heavy vehicles.</p> <p>As an alternative, there are former factory sites in Stourport and Kidderminster which would be eminently more suitable for the proposed use, having been properly constructed and more accessible.</p> <p>Problems with main drains in Clows Top - currently residential and business premises have no access to main drains - the dependence on septic tank drainage has caused the local authority to impose conditions on any proposed residential developments that any new builds would need to be connected to main drains.</p> <p>Therefore, the increased use/occupation of this site would necessitate the requirement for appropriate foul</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>drainage provision in line with the local authority requirements to prevent any hazardous environmental damage being caused.</p> <p>Traffic - this has increased in recent years. Pavements provision in this part of the village is less than adequate with an interrupted pavement on only one side of the road. It is hazardous enough at the present time and any increase in the levels of danger and inconvenience to pedestrians and other road users would be unacceptable.</p> <p>Any Local Plan should address the real Community issues that exist, rather than create more detrimental ones.</p>	
	LPPO3000	Clows Top	Object	<p>Looking at the various options outlined in the proposals, I would like to comment on the land at Clows Top. As I understand it from the paragraph 8.40, (p65), there should be provision for mains drainage for such a site and there currently is none at Clows Top. The site is also adjacent to village residents and countryside beyond. Although this site is classed as brownfield, access from the A456 in either direction for large heavy goods vehicles transporting large scale fairground equipment could be extremely hazardous. Many users of the A456 do not adhere to the 30 mph speed limit and therefore an entrance and exit to this site could impact detrimentally to the safety of road users and pedestrians at Clows Top.</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				Policy 19 - Given the guidelines relating to site safety and standards outlined in Policy 19, again I would comment that Clows Top is unsuitable for a site for travelling show people and their equipment and none of the criteria on which planning permission would be granted applies.	
	LPPO3035	Clows Top	Object	The site being close to the junction of the A456/B4202 is highly inappropriate and dangerous with reduced visibility on a busy road.	Comments noted.
	LPPO3260	Clows Top	Comment	<p>1. We are surprised that consultation does not include neighbouring parishes. In view of the proximity of Lindridge Parish to CLOWS TOP we request that we be included, as stakeholders, in any consultation regarding matters likely to impact on our residents, such as the siting of travellers or show people's caravans or equipment.</p> <p>2. On the present classification BR/RO/1 LAND AT CLOWS TOP:- In view of the existing problem of fast moving HGV and other traffic on the A456, any further increase in use of road by towing or other heavy vehicles should not be recommended. Also we would remind planners that in severe weather, which we have been told to expect more frequently due to climate change, the A456 has often become blocked at CLOWS TOP HILL due to stranded HGVs, therefore it does not seem that the proposal has been adequately tested, as required, to allow for climate change.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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	LPPO3370	Clows Top	Object	<p>1) The site is at the top of a very steep hill, close to a busy road junction and due to the site's restrictive access, would create added dangers to traffic</p> <p>2) The turning circle required for large vehicles off the main A456 would be inadequate and cause a danger to other road users and pedestrians.</p> <p>3) This is a Green Belt area and the site would be inappropriate for such a development.</p> <p>4) Clows Top is a settled community, with facilities supporting many neighbouring small villages and this development would conflict with the lifestyle of the current population and have a detrimental effect on the area.</p> <p>5) Such developments should be situated closer to larger settlements where the existing facilities can cope.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO3515	Clows Top	Object	<p>As residents of Clows Top, we would like to notify you of our objection to the proposed development of a traveller, travelling showpeople or Gypsy site on the former transport yard site at Clows Top as described in the Wyre Forest District Local Plan Review Preferred Options consultation documents.</p> <p>Our primary reasons for this objection are listed below:</p> <p>1. That, in 2011, this site was nominated as such at</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>which time the plan was rejected for a number of valid reasons. Issues of noise, incompatibility with the local, rural community, lack of appropriate, safe access to the site, lack of local amenities and the unsuitability of the site for development (see point 2 below) due to lack of drainage and sewerage treatment options were cited at the time as reasons for the rejection of this plan. Since the situation has in no way altered during the intervening time and no modifications have been made to the site it follows that all the above mentioned objections, of which your office is well aware, would still apply.</p> <ol style="list-style-type: none"> <li data-bbox="891 810 1529 1161">2. The same issues of sewerage and drainage which have so far been one of the key objections to any and all attempts by the site owner to gain planning permission for a housing development both on the transport yard site and the former public house site would entirely apply to the use of the site for travelling show people or Gypsy accommodation. If these issues can be resolved for one proposed use they can just as easily be resolved for the alternative proposed use. <li data-bbox="891 1169 1529 1385">3. Clows Top is a small, rural community from which the majority of people travel by road to work in the local towns of Tenbury, Bewdley and Kidderminster or further afield to Birmingham and surrounding areas. As such, the facilities available within the village (Small shop, post 	

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				<p>office, butcher, village hall) are limited because the majority of highly mobile residents are quite capable of locating and accessing additional services elsewhere. The village does not offer a primary school, GP surgery, public house nor adequate transport links to access these or other facilities apart from by private car. The village is, by definition, currently not well suited to any lifestyle other than that outlined at the beginning of this paragraph. The development of the proposed site for housing would allow additional families with a rural/commuter lifestyle to augment the village population. Such population might very well benefit the small business currently offering facilities within the village. However, these constraints make it obvious that any other settlement other than that outlined would lead to frustration at lack of facilities and a poor quality of life for those forced into such a situation by the limited availability of alternative traveller sites.</p> <p>4. Government policy has, for a long time, been that all residential development should offer mixed accommodation. For the housing developer this means a strictly regimented blend of luxury through to affordable properties. Developing the site in Clows Top as a traveller, show people or gypsy site would, in effect, create a large concentration of a single property type within a very small, rural community</p>	

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				<p>lacking the capacity to absorb such a development. Community cohesion is a buzz-word used by councillors but such cohesion would inevitably be a casualty should this development go ahead.</p> <p>Summary:</p> <ul style="list-style-type: none"> • It is our contention that development of the former transport yard site for mixed housing could, if designed sensitively and in keeping with the local housing stock and community demographic, be of benefit to the village of Clows Top. • Any objection to the development of the site for housing on the basis of access restrictions to the busy main road (A 465), drainage or sewerage would apply to all residential use of the site including that by travellers, show people or gypsies. • That every objection raised and validated by the rejection of a similar proposal in 2011 still stands. • Any development type considered for this site will have a disproportionate impact upon the community and the village of Clows Top due to its small size and this should be taken into account before any development is approved. 	

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	LPP04096	Clows Top	Object	<p>We are writing with regards to the above proposal as outlined in the Wyre Forest Local Plan Review Preferred Options (June 2017) Policy 8F, on page 64.</p> <p>We wish to object on the following grounds:</p> <ul style="list-style-type: none"> • very poor access: access from the A456 to the proposed site is very limited and not at all suitable for large, heavy duty transport vehicles and trailers. The turning access into the site is narrow and long vehicles would have to mount the kerb on the opposite side of the road, causing danger to pedestrians, children playing and long term damage to both the road and path infrastructure. • major traffic hazard: the site's access is at the top of a steep incline and the turning point is at the brow of the hill. Large vehicles turning at this point in the road would create a considerable road block, resulting in possible collision with other vehicles travelling in both directions. Traffic through the village would also build up considerably and create traffic jams on what is already a very busy major A road from the West Midlands to mid and west Wales. • poor condition of the land: the local community have been led to believe that the land is not stable, as it was used for the disposal of many materials in decades gone by. This has resulted in insufficient drainage and created an unstable 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>ground for any large heavy vehicles to be stored without possible danger of earth movement and slippage onto the dwellings below this land on Clows Top bank. WFDC would need to invest valuable resources to research this, when they could spend their limited funds in other areas to improve the village facilities.</p> <p>We would also like to ensure that WFDC are aware the area allocated for the proposed provision detailed on the map on appendix a (Villages and Rural West) is incorrect and very misleading, as it gives the impression that the whole area in yellow is being considered as a Potential Site for Travelling Showpeople. Whereas some of this area is owned by Matthews Construction and should indicate accurately its potential for housing.</p> <p>Finally, as this is a 'Brown Field Site' and amongst dwellings, within the village perimeter, we feel WFDC need to consider proposals that ensure the long term sustainability for the village and work with the local community to support the installation of main sewerage, an improved water supply and provide a small number of long term housing options that contribute to village life. If Clows Top is able to develop into a thriving community with more services and a healthy infrastructure, this will enable the village to become a 'community hub' supporting the many hamlets and small villages in its surrounding area that have lost their own local provision over the years.</p>	

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	LPPO4224	Clows Top	Object	<p>I object to the land at Clows Top being used for travelling showpeople. I wish to comment as follows, in particular for the showpeople but has relevance in respect of the proposed housing site:</p> <ol style="list-style-type: none"> 1. Difficult vehicular access to and from the site from the A456. Access is on the brow of the hill. The site is not capable of safe, visible access from the A456 highway and will have an adverse impact on the safety of the highway network and its users. 2. Turning into and out of the site will be difficult- A456 is not wide and there are houses opposite the access. 3. Speed of vehicles and motor bikes through Claws Top. There is a disregard of the 30mph limit. 4. The type of vehicles and trailers used can be large and extremely long. When they are entering or exiting the site, they will be slow therefore blocking the A456. This, coupled with 3 above, could be an accident waiting to happen. 5. There could be numerous vehicles, trailers and caravans entering/exiting the site at all times of the year. 6. There is no mains sewerage/drainage. How will the showpeople's sewage be disposed of? This also applies 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>to any housing development.</p> <p>7. The site is flat but is on the top of the hill. Therefore the sides along the perimeter form a bank. The land on the site is unstable and is falling away and is now close to a neighbour's field and also a public right of way. There is movement around the perimeter of the site, this before any heavy vehicles and trailers are using the area. Equally, this will be issue for house build.</p> <p>8. There is a lack of adequate access to services and utility infrastructure. Mains water supply and mains electricity services are currently working to capacity. There are Interruptions to these services during the year.</p> <p>9. In respect of proposed houses, the number of houses proposed of 30 (I believe) could result in around 70 people (say 2 adults plus 1child per house) which will really stretch comment 8 above. It could also mean there would need to be parking for 70 motor vehicles on the site. Schooling could be an issue. Bus services are very limited.</p> <p>10. The cumulative impacts of the site would harm the character and appearance of the area.</p>	
	LPPO4319	Clows Top	Object	<ol style="list-style-type: none"> 1. The proposed site has insufficient amenities i.e. water/sewage (low water pressure). 2. Clows Top area/crossroads has traffic 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal

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				<p>congestion/very poor visibility at junctions.</p> <p>3. The site is well known for poor and instability due to its previous use for mining /disposal waste metal.</p> <p>4. The infrastructure for this and nearby villages (schools, doctors etc.) are full to capacity.</p> <p>5. Thus I consider the site is only suitable for a small business venture i.e. garage or similar to support local needs.</p>	for the Travelling Showpeople site will be included in the pre-submission documents.
Anonymous	LPPO4486	Clows Top	Object	<p>Object to this site for the following reasons:</p> <ul style="list-style-type: none"> • There are no mains drainage/sewage. • Poor access with the speed and amount of traffic. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO4670	Clows Top	Object	Objects.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO5068	Clows Top	Object	<p>Clows Top: Should be kept as a core housing site and not used for travelling /show people.</p> <p>There is a need to bring new people into the village to revitalise it and failure of previous plans to build new houses on the land around the Victory Hall is much</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission

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				<p>regretted. This development would also have gone a long way towards improving the appearance of the area which is, at present, an eyesore.</p> <p>The exit from the old garage site is onto a very busy stretch of the A456 with traffic which is often fast moving, despite the speed limit in place. Movements of large articulated vehicles onto and from the site is potentially dangerous. It is also felt that such activity, in such a prominent position in the village, would do nothing to improve the appearance of the area.</p> <p>The absence of adequate infrastructure, unreliable water and electricity supplies and, in particular, the sewerage system, has been the main stumbling block to development and was at the heart of the rejection of the site as a potential one for travellers/show people when the subject was last considered in 2012. Nothing has changed, and, since the DC's criteria for a suitable site hasn't changed either, this site must still be considered unsuitable.</p>	<p>documents.</p> <p>Note that Malvern Hills District Council has been consulted on the emerging Wyre Forest District Local Plan, and we will continue to consult with them.</p>
Anonymous	LPPO1005	Clows Top	Object	<p>Objects to the use of this site for Travelling/Show People.</p> <p>This site should instead be developed as affordable housing both for local residents, and to entice new families into the vicinity. This would bring new skills into the area, and help to boost the local economy long-term.</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
Chaddesley	LPPO1038	Clows Top	Comment	<p>Only the site at Clows Top is a brownfield site, so this</p>	<p>Comment noted.</p>

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Corbett Parish Council				would seem the preferred option.	
Pensax Parish Council	LPP01086	Clows Top	Object	<p>Pensax Parish Council supports Clows Top in objecting to land as a potential site for Travelling Showpeople.</p> <p>Clows Top and the surrounding Parishes have limited areas on which houses can be built due to the rural landscape.</p> <p>This brownfield site should be used for a mixed housing development to enable local people to have some affordable housing in the area.</p> <p>Site is not suitable for Travelling Showpeople due to access problems for large vehicles and cars towing caravans. Traffic on the A456 has increased considerably over the last 10 years, the speed limit of 30mph is not adhered to by the majority of drivers making entry and exit to this land very dangerous. Near misses are witnessed by residents living in this area of village.</p> <p>Clows Top does not have a main sewer connection, this is essential for housing to be built and would be of benefit to the majority of the houses in the village. It is assumed Travelling Showpeople would require a mains sewer but we note the comment in the consultation document stating they need to 'source a connection' whatever that means, this point needs clarification.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>The land is known to be contaminated with buried items, it is thought this could have made the area unstable in places and large vehicles could cause slippage to occur if they use the site. We are aware this would need to be rectified whatever the site is used for but feel the Travelling Showpeople may not tidy the land up to the required standard before they start using it thus creating a potential hazard for nearby houses below the site.</p> <p>No indication of how many families/caravans the site would be allowed to have so it is difficult to assess the impact this would have on the area.</p> <p>Map in your consultation document is incorrect and is very misleading.</p> <p>Residents of Pensax Parish wish their voice to be heard.</p> <p>Pensax has no land on which building would be allowed and would like to see affordable homes for the next generation built in Clows Top.</p> <p>Pensax Parish Council strongly objects to the use of the land as a Travelling Showpeople site.</p>	
Bayton Parish Council	LPPO817	Clows Top	Object	Bayton Parish Council wishes to object to the land at Clows Top being classed as a potential site for Travelling Showpeople.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be

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				<p>Site has access problems - not suitable for large vehicles, speeding traffic. No mains sewer in village and clay soil does not allow for good drainage. Would a showpeople site require connection to the mains?</p> <p>Land thought to be contaminated as landfill. Bank unstable so would be hazard for houses below. How many families would live there?</p> <p>Map is incorrect and misleading. We wish to see affordable housing in village not a travelling showpeople site.</p>	<p>included in the pre-submission documents.</p> <p>It is a single family group requiring a new site as outlined in the policy.</p>
	LPP0508	Clows Top	Object	<p>Policy 19 - Site Standards for Gypsies, Travellers and Travelling Showpeople Proposals for Gypsy, Traveller and Travelling Showpeople sites will only be granted planning permission where:</p> <p>i. Comment: At a recent village meeting of up to 100 residents it was clear that providing an area for Travellers and Travelling Showpeople right in the middle of this community would definitely not be "sensitive to the local context".</p> <p>ii. Comment: a. I believe the ground in this area is very unstable and would require considerable work to avoid subsidence down the steeply sloping hillside which</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>would be caused by heavy vehicles.</p> <p>b. Current business vehicle use has been reported by one resident as already causing heavy deterioration where vehicles are joining the main carriageway.</p> <p>iii. Comment: Provision for sewerage is a problem and not available at Clows Top. The current infrastructure (water, electricity) is poor and requires modernisation, this is not planned until after the date for the implementation of this proposal.</p> <p>iv. Comment: With regard to 'and residents [and]* should meet local authority standards'. *(I believe this second 'and' in the proposal document is a mistake).</p> <p>c. This is a small community that needs all the help it can get to keep the local businesses supported; Having a travelling community located at Clows Top would be devastating in the problems it would cause.</p>	
	LPPO672	Clows Top	Object	<p>I would like to object on the grounds of:</p> <ul style="list-style-type: none"> • Poor access to the site from a very busy main road (A456) at the top of a very steep hill for large vehicles with trailers. • Sewage problems - there are no mains in the village. The properties sit on clay and we suffer from poor drainage within the village. 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<ul style="list-style-type: none"> We would prefer new housing on the land. There is a need for new houses in the area. We do not want the site to become an eyesore (more so than it is at present). 	
	LPP0609	Habberley Road	Object	Not suitable	Objection noted.
	LPP01689	Habberley Road	Object	Strongly objects to the proposed travellers' site at Habberley Road, Bewdley; based on personal perception that it might make the area less desirable, affect house prices and could change the quiet Meadow Rise area for the worse. The Heath Hotel could also be affected.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP01691	Habberley Road	Object	<p>I oppose plans to use the site in Habberley Road for travelling showpeople:</p> <ol style="list-style-type: none"> Heavy traffic Environment issues Effect on to local businesses, Hotel and Golf Course Too close to Habberley Valley which is popular with visitors. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP01692	Habberley Road	Object	<p>I object to the Habberley Road site because:</p> <p>The area is Green Belt</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be

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				<p>It would be degenerative to the area.</p> <p>The road is a very busy and more traffic and large vehicles using the road to gain access/egress from the site would be dangerous.</p> <p>The site could easily be exploited.</p> <p>This area has been refused planning in the past due to its history.</p>	included in the pre-submission documents.
	LPPO1927	Habberley Road	Object	<p>We are extremely concerned about the proposed developments that converge onto the B4190 Habberley Road. Traffic leaving the Heath Hotel and Pines Golf Club have to be very careful when entering this B road due to the series of bends on it. Plans for the Safari Park hotel will increase traffic in this area.</p> <p>Proposed Travelling Showpeople site would mean large equipment pulling in and out onto the B4190 from a narrow entrance and also from a slight incline.</p> <p>The proposed developments also being on Green Belt land.</p>	Please see above. Any potential development would be considered by Worcestershire CC Highways with mitigation works if required.
	LPPO1929	Habberley Road	Object	I wish to object to the proposed development at Habberley Road.	Objection is noted.
	LPPO1932	Habberley Road	Object	Objects strongly to this proposed site. Reasons for objection are based on personal perception that there might be damage to the local community, both in the	Objection is noted. Information on the Local Plan was posted to households within the District and advertised

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				value of property, increase in vehicular traffic and most worryingly a potential increase in crime. This latter point has serious implications on an already stretched to the limit a Police Service. Asks if there are alternative appropriate locations.	throughout the District.
	LPP01935	Habberley Road	Object	<p>Objects to the Habberley road site based on the personal perception that it might have an adverse impact on the appeal of the local hotel as a potential wedding venue and have an impact on the golf course as an area of natural beauty.</p> <p>Bewdley with its heritage and beauty is the real jewel in the crown of Wyre Forest tourism and should be preserved at all costs.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
Bewdley Pines Golf Club	LPP01944	Habberley Road	Object	<p>Objects to the Habberley Road site for travelling showpeople for the following reasons:</p> <ul style="list-style-type: none"> • There is a potential Bronze Age burial mound here. A planning Inspectors ruling was that there should be no encroachment of the area between Kidderminster and Bewdley. • If agreed for Travelling Showpeople its use could not be restricted to one user and would bring potential for multiple living facilities. This would give us concern for the security of our business and could potentially damaging trade and putting jobs at risk. • Highway issues - This site is between two major businesses in the area on an already busy road 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>(B4129) creating greater potential for an incident to occur due to lorries and plant turning.</p> <ul style="list-style-type: none"> • Losing more land that acts as a barrier between Kidderminster and Bewdley • Noise and security issues for local businesses and residents. <p>Damage to local environment and the economy.</p>	
	LPPO2221	Habberley Road	Object	<p>PROPOSED SITE FOR TRAVELLING SHOW PEOPLE HABBERLEY ROAD, BEWDLEY I object as follows</p> <ul style="list-style-type: none"> • This would severely disrupt the natural land buffer between Bewdley and Kidderminster. • The size/permanent nature of the site would be a blot on the landscape. • The site is too close to existing homes. • The site is situated within 200 meters of another site proposed for a housing development (WA/BE/5) which must be a priority in Bewdley's development. • Habberley Road is used as a Kidderminster by-pass with levels of traffic are too high for any further developments. • The negative impact on local tourism specifically its location at the entrance to the Mercure Hotel <p>Consent for the site would pave the way for future</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				developments on adjoining land	
	LPP02222	Habberley Road	Object	<p>We object to Habberley Road site for Travelling Show People as follows:</p> <ol style="list-style-type: none"> 1. The proposed plan is against planning advice, earlier applications have been refused 2. Effect on local businesses 3. The B4129 is a busy road making access to/from the site potentially dangerous. 4. Other available sites in the area would be more suitable from this point of view 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP02355	Habberley Road	Object	<p>I object travellers site on Habberley Road, Bewdley Road already v busy would be worse.</p> <p>Effect on Mercure Hotel.</p> <p>Could affect golf/health club/nearby residents</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP02371	Habberley Road	Object	Object to travellers' site Habberley Road site: traffic safety on busy road/ loss of Green Belt which should be protected to stop Bewdley and Kidderminster merging.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP02415	Habberley Road	Object	It is my view that the land off Habberley Road, Bewdley is entirely unsuitable for this use as it is inconsistent with	Objection noted. The proposed sites continue to be evaluated to identify the

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				<p>the development of Bewdley as an attractive place for visitors and a centre for tourism, especially as this site is so close to Bewdley’s major hotel, as well being inconvenient for shops and other services. It would make more sense to locate this site closer to an area where the travelling show people work.</p>	<p>most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
	<p>LPPO2425</p>	<p>Habberley Road</p>	<p>Object</p>	<p>I would like to object to a potential site for Travelling show people the land off Habberley Road, Bewdley. I have reached the decision to object to this plan after much consideration, including the social, environmental and economic reasons.</p> <p>Considering the location of all potential sites the site proposed near Habberly Road is the most heavily populated and therefore immediately appears to be the least suitable. The plan also suggests a large number of houses to be built in Bewdley, especially in the Wribbenhall area. Thus the increase in dwellings will result in a growth in the number of families and transportation in the local area. Therefore, I believe this site is not suitable for the purpose suggested as there would be a further increase to the population of the local area and certainly an increase in the amount of large transportation on the roads.</p> <p>The increase in large transportation on the roads of Bewdley would be a very bad idea. The area is an attraction for many people all over the UK, due to the river, buildings, Seven Valley Railway and West Midlands</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>Safari Park. The roads would not be able to withstand more heavy vehicles in the area.</p> <p>Similarly, the addition of a site for Travelling Showpeople would be a disadvantage to the town, due to the noise pollution of the constant storing, and maintaining of fairground rides and show attractions. This would in turn have a negative impact on the town's shops and a dip in property value.</p> <p>Likewise, the addition of a site for Travelling show people in Bewdley would cause strain on the local areas resources. With an increasing number of houses in Bewdley, it is not possible to house any more residents. This would not be fair for the current residents of the small town, as their quality of life should not be affected via this decision.</p> <p>Another wonderful attraction in Bewdley is the Mercure Hotel; from use of a high quality gym to hosting weddings the hotel attracts visitors to the area. I strongly believe the addition of a Travelling Showpeople site opposite the hotel will have a detrimental impact.</p> <p>It seems both unfair on West Midlands Safari Park and Stourport Fun Fair attractions that have supported us, to allow the opening of a travelling show people site so close to these established attractions. Likewise, due to the current presence of both of these attractions, it seems rather unnecessary to host the travelling show</p>	

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				<p>people in Bewdley. Surely there is no opportunity in the market anywhere near the Wyre Forest and thus it would be more appropriate for this site somewhere nearer the potential market.</p> <p>In conclusion, I object to the proposal of a policy 8F - Site Provision for Travelling show people of the land off Habberley Road, Bewdley for a variety of reasons.</p>	
	LPPO2429	Habberley Road	Object	<p>I am writing to place a formal notice of objection to the proposed travellers' site on Habberley Road. I disagree totally with your strategic review proposals. The road is already ridiculously busy. This would only become worse with any building or development in the area of Habberley Road. Furthermore, the Mercure offers one of the best venues and places to stay in Bewdley. A traveller's site would undoubtedly impact upon their business. Also concerned about the impact on neighbouring residents. I wish to log my objection to your proposal in the strongest of terms.</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
	LPPO2430	Habberley Road	Object	<p>This proposal needs to be fully explained to the residents of Bewdley. What exactly is proposed for this site? Will it be purely to store circus equipment, or will people be staying there? If the former I object on the grounds of large equipment using Habberley Road and causing congestion on an already busy road and the effect on the environment and if the latter I object to a site for travellers being set up so near to a hotel which brings visitors to the town and surrounding area and will also have an impact on the houses nearby and the</p>	<p>The site was one of 5 consulted on for a specific family of Travelling Showpeople already resident in the district.</p>

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				environment.	
	LPPO2456	Habberley Road	Object	<p>I am writing to object to the proposed Travelling Show People site opposite the Mercure Hotel on the B4190 Habberley Road.</p> <p>This land has been designated as Green Belt land for a good reason, to stop the relentless development of the countryside between Kidderminster and Bewdley. This is a very pretty and important ‘green lung’ for those who live in the area, and there are NO excuses for it to be developed. Planning Inspectors have already ruled that there should be no encroachment into the area.</p> <p>Travelling Show People make up a very small percentage of the travelling community and the number of travelling circuses and fairgrounds cannot warrant using this Green Belt land in such a way. Furthermore there can be no guarantees that the site will not simply become a traveller encampment for any of the Gypsy or Roma community. The environmental impact on this area would be immense. There can be no guarantees that what starts as a traveller site does not rapidly become a settled traveller site, with the erection of static caravans and more permanent dwellings.</p> <p>The access to this site is unsuitable from each direction. The B4190 has become a very busy route between Bewdley and Kidderminster, usually used as a rat-run to avoid congestion along the A456. As the plans are</p>	Please see above. This was not proposed as a site for Gypsy or Travellers but for Travelling Showpeople.

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				<p>pushed ahead to further develop the Safari Park site, congestion will increase along the A456, and drivers will naturally seek to use quicker routes such as the B4190. Poor visibility and increased traffic will increase the risk of traffic accidents along this route.</p> <p>Residents who live along Trimpley Lane in Bewdley will see a huge decrease in the value of their property. Who is going to recompense the householders who have to put up with devaluation of property, loss of privacy?</p> <p>It is highly unlikely that the Mercure Hotel will want to remain in business overlooking a travellers' camp. Who would want to come and visit the town to spend their time looking at caravans? How many jobs will be lost if the hotel closes? This area needs every job it can get, but the development of this site will bring no jobs to the area, just multiple problems that have no easy solution.</p>	
	LPPO2545	Habberley Road	Object	<p>I feel that allowing this site to be used for Travelling Show People will:</p> <ul style="list-style-type: none"> • Only planning applications with exceptional circumstances should be permitted within the Green Belt and I don't feel this application has exceptional circumstances. • The B4129 is a very busy road and will create highways and traffic issues • There is a high risk that this site will create environmental issues 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<ul style="list-style-type: none"> • There is a risk this site that could be a risk to local businesses • The cumulative impact on the site would harm the character or appearance of the area and result in an unacceptable impact, especially on the Habberley Valley 	
	LPPO2548	Habberley Road	Object	<p>I wish to lodge my objections on the proposal to allocate the land on the B4129 Habberley Road as a permanent travellers' site. My concerns are as follows:</p> <ul style="list-style-type: none"> • Increase in traffic on an already busy highway causing further delays than normal and an increased risk of accident. • Damage to the local environment. • Blot on the landscape, the local scenery is a thing of beauty and this will be put at risk. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO2552	Habberley Road	Object	<p>I wish to object to the proposed “travelling show people” site opposite the Mercure Heath Hotel Bewdley.</p> <p>This area is Green Belt and previous planning applications have been rejected due to;</p> <p>Potential Bronze Age burial mound and</p> <p>No encroachment to the area between Bewdley and</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>Kidderminster.</p> <p>In my opinion brownfield sites with existing road links should be considered before proposing Green Belt.</p> <p>Its close location to existing businesses could affect trade, resulting in reduced revenue to the area with a knock on to local employment.</p> <p>The proposed site is of considerable size and would put additional strain on the busy roads around this area. Other sites in the proposed plan offer better road infrastructure to suit the larger vehicles associated with this type of site. I.e. site off Stourport road (A451) adjacent to industrial estate.</p>	
	LPPO2555	Habberley Road	Comment	Comments that the site may not be for sale or affordable.	Comment noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO2594	Habberley Road	Object	<p>I wish to strongly object to this proposal on the following principal grounds:-</p> <ul style="list-style-type: none"> • There is no demonstrable demand for a travellers site in Bewdley. • Developments of this nature should be located close to existing similar developments where the 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>particular issues arising can be more efficiently and effectively monitored by the authorities.</p> <ul style="list-style-type: none"> The proposed site is directly opposite the Heath Hotel and development of the site would damage the attractiveness of this important leisure and tourism facility with the result of a reduction in its use and a potential loss of income and employment. <p>Taking all these matters into account I request that the Council should not include the Habberley Road site for any development as a site for Travellers in the Local Plan.</p>	<p>The consultation was for a Travelling Showpeople site and the demand for the site is evidenced in the policy.</p>
	LPP02650	Habberley Road	Object	<p>Objects to the Habberley Road site for the following reasons:</p> <ul style="list-style-type: none"> Inappropriate development in the Green Belt. There are other sites under consideration that are not in the Green Belt. It is adjacent to a Bronze Age burial site Traffic. Habberley Road is very busy, almost acting as a bypass from Kidderminster to Bewdley and Stourport. Development at Mecure Hotel, West Midlands Safari Park and South of Habberley Road will cause problems for everyone living along this stretch of road. There is no right turn at Catchems End and the vast majority of people travelling in either direction past this proposed site is 50-60mph and some 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>much faster. This I fear would cause an accident hot spot where ultimately fatalities could occur with heavy show machinery entering and leaving the proposed site.</p> <ul style="list-style-type: none"> • The site is not previously developed land. • There is an abundance of wildlife in the surrounding woods and fields, including deer, badgers, falcons, sparrow hawks and owls, rabbits and squirrels, which would be displaced by allowing such development to go ahead. I also understand there may be some BOP flora which I am unsure of whether this is protected or not, perhaps you could have someone let me know. • There are three more desirable locations: Rear of Ceramaspeed which is owned by the Council; Heath Lane which is already owned by the family; Clows Top which is already in use. 	
	LPPO2666	Habberley Road	Object	<p>I quote from your document 19.4:</p> <ul style="list-style-type: none"> • "where possible Gypsy and Traveller sites should be developed near to housing as part of mainstream residential development" • " traveller site development in open countryside should be strictly limited" • " the site should give adequate consideration for towing caravans to enter, exit and manoeuvre 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>around the site"</p> <p>Habberley road is a fast moving road with a 50 mph section. It is very busy especially in at rush hour as it links Stourbridge, Hagley Wolverhampton, Bridgnorth with Stourport and Worcester without the need to pass through Kidderminster.</p> <p>The site is rural in nature and there is a series of bends at one end of the road - the land falls away from the road and the road itself has only two lanes.</p>	
	LPPO2893	Habberley Road	Object	<p>this proposal is for one family in particular, it would not restrict other travelling show people from using the site. This means that the amount of people and vehicles on the site could grow which in turn will cause more issues to the area including potentially damaging trade of local businesses and damage to the local environment.</p> <p>It will also bring problems to traffic flow as access to and from the site from Habberley Road is not suited to large vehicles coming and going.</p>	The site allocation is for one family of Travelling Showpeople currently resident in the District.
	LPPO3038	Habberley Road	Object	<p>Objections towards the proposed traveller sites in the plan on the B4129 Habberley Road in Bewdley.</p> <p>1. The site will be open to all travelling show people/travellers causing constant movement of traffic on and off the site. This will be extremely dangerous given it is a rural road with lots of properties and houses</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>with families so the noise at all hours would also be unacceptable.</p> <p>2. The B4129 is a rural road which has become busy over the years and with the potential extra traffic, will make it a very dangerous road with accidents waiting to happen.</p> <p>3. If this plan goes ahead, the hotel and golf club will suffer, causing damage to their businesses.</p> <p>4. The development will result in damage to the local environment which is a beautiful area. Wild life will suffer.</p> <p>5. All of the residents who live on this road will be affected by the noise of the travelling community. It will adversely affect the property values.</p> <p>6. The idea of the site is already causing bad feeling in the area and there are bound to be negative tensions if this is given the go ahead.</p> <p>7. There are plenty of brownfield sites available in other larger towns that would be more suitable.</p> <p>8. Tourism would also be affected.</p> <p>9. It further erodes the rural space between Bewdley and Kidderminster which is supposed to be protected to</p>	

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				maintain the separate identities of the towns.	
	LPPO3232	Habberley Road	Object	<p>We DO NOT support the proposal for a transitional travellers site at Habberley Road.</p> <p>The site sits within the Green Belt and is adjacent to a hotel and residential properties</p> <p>The local roads, particularly the corner at Catchems End does not lend itself to coping with fairground attractions etc which are transported on huge vehicles.</p> <p>Spoil the beauty of the green space. Worried about litter left.</p> <p>Furthermore, with a permanent site already in nearby Stourport on Severn, it makes so much more sense to develop a site in Stourport, rather than create a huge ongoing and potentially dangerous traffic problem on a busy, much used B road in Bewdley.</p>	The proposal was for Travelling Showpeople and would be a permanent location for a family already resident in the District.
	LPPO3432	Habberley Road	Object	I feel that this land should be used affordable housing for the young people of Bewdley, and not for strangers to the town, there are community housing being built in the area, but the young are unable to purchase these if they are over a certain pay bracket, so youngsters who are in this situation are unable to purchase new properties, as they are either in the higher unaffordable range or the lower which they are unable to purchase	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				There is enough traffic on the Habberley Road without the comings and goings and mess of travellers, why not put it in Stourport or Kidderminster.	
	LPPO3558	Habberley Road	Object	<p>The site is in close proximity to popular businesses, Bewdley Pines Golf Course and The Heath Hotel which is the main hotel for tourists to the Georgian Town of Bewdley. The popular visitor site of Habberley Valley with its interesting flora and fauna is also nearby.</p> <p>There is doubt that the site could be used for sole occupancy which could lead to a large development on Green Belt land.</p> <p>Other proposed sites have the infrastructure to cope with large trailers and lorries and would be more suitable for purpose.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO3565	Habberley Road	Object	I wish to object under section 19 of the potential site for show people on the B4190 opposite the Mercure hotel Habberley Road Bewdley, Against previous planning advice Site would be open to ALL travelling people Highway issues Damage to local environment.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO3742	Habberley Road	Object	<p>Previous planning rulings on this area, Green Belt erosion.</p> <p>Use could not be restricted to one operator thus opening the need for living facilities.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>Highways issues.</p> <p>Potential damage to local businesses.</p> <p>Environmental damage.</p>	
	LPP04000	Haberley Road	Object	<p>I strongly object to the use of the land opposite the Heath hotel as a site for travelling show people. When the Safari Park has an event the traffic blocks access to Trimpley Lane and Catchems End thus affecting Haberley Valley Road. Traffic is backed up at Catchems End when flooding occurs. Extra people and vehicles will make it even more difficult to turn out of Trimpley Lane. The B4129 is unsuitable for large vehicles. The community, hotel and gymnasium would be negatively affected.</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
	LPP04022	Haberley Road	Object	<p>I wish to object to the proposed travelling showpeople site on Haberley Road in Bewdley for the following reasons.</p> <p>(1) Whilst the site is similar in size to one where 45 dwellings are proposed, it is naive to think that it is for one temporary user and would become an invitation to others to come to the site.</p> <p>(2) Having already been turned down for previous planning applications on several grounds, it seems a strange decision to now propose this development.</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>(3) Historically local businesses suffer when such a development is allowed and there are several businesses close to the proposed site.</p> <p>(4) Bewdley is a town which relies heavily on tourism, and the potential negative impact on local businesses and the community seem disproportionate to the benefit of supporting a single travelling showperson.</p> <p>Please do not allow this to proceed.</p>	
	LPPO4092	Habberley Road	Object	With regards to the showpeople's site, this will destroy the area, and as the area is exposed it is not the right area for storage and living. The visual impact of the present site is terrible. Transport this to the proposed site and the visual effect will be horrific. In a critical area of Green Belt, it is also situated on a far stretch of road opposite an important tourist hotel (Ramada).	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO4094	Habberley Road	Object	<p>We wish to strongly object to the proposal of having a traveller site on Habberley road. It will bring disruption to the area as well as loss of business to the Ramada hotel and the other businesses within the hotel.</p> <p>It will bring damage to the local environment and many highway issues.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO4095	Habberley Road	Object	I am writing to object to the proposal of siting a provision for travelling show people at Habberley Road	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be

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				<p>Bewdley.</p> <p>My reasons for objecting are the following :-</p> <ol style="list-style-type: none"> 1. Bewdley survives on tourism, so this will be a huge negative factor for attracting tourists to the town. 2. The proposed site is Green Belt. 3. Traffic implications at the already over loaded Catchems End Junction and this would no doubt make matters worse. 4. Most sites for travellers are located in Stourport which has probably developed ways of coping with the influx of travellers in schools and GP surgeries and social services. <p>Surely therefore it would be more logical to locate this site on Land within Wilden Top Area of Development Restraint. This is also the largest area of land so would allow better planning.</p>	<p>included in the pre-submission documents.</p>
	LPP04108	Habberley Road	Object	<p>POTENTIAL SITE FOR TRAVELLING SHOW PEOPLE</p> <p>I write to object to this site being included for the local Plan Review for the following reasons:</p> <ul style="list-style-type: none"> • The site does not meet the necessary requirements as laid out PPTS(2012) and quoted in para 8.49 of the Council Plan and sites located in the Green Belt are inappropriate 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>development.</p> <ul style="list-style-type: none"> • Sites adjacent to this land have been previously subject to planning applications and the planning inspectors ruling was that there should be no encroachment of the area. The land is also of historical and wildlife importance and is near to visitor attractions such as Habberley Valley and Wassell Wood. • The negative effect this site might have on The Heath Hotel and Bewdley Pines Golf Club could result in loss of business and jobs and less tourism would impact very badly on other smaller businesses in the attractive Georgian town of Bewdley. • There is a serious Highways issue to consider. The B4129 is not suitable for heavy duty traffic which Show People would use. It is a very busy road where fatalities have occurred in recent years. The turn at Catchems End is often a bottleneck and large vehicles would have difficulty manoeuvring there. • The question arises that the site could not be used for sole occupancy and could eventually become a large site for Travelling Show People and would the Council be able to afford the upkeep and supervision of the site. • Other proposed sites appear to be very much more suitable (e.g. Kidderminster and Stourport) as the infrastructure is already in place and certainly the development of one of these would 	

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				raise less environmental issues.	
	LPP04706	Habberley Road	Object	<p>Policy 6B notes the need to safeguard and enhance open countryside, maintain openness to Green Belt and the provision of infrastructure and Policy 25C allows development on Green Belt only for small scale affordable housing in special circumstances.</p> <p>Concerning infrastructure, all Wribbenhall sites will be affected by the bottleneck of the Bewdley bypass where it ends at the Kidderminster end and traffic connects with the Habberley Road. The addition of a potential Traveller site on the Habberley Road would further add to this congestion. Plus the development of the Safari Park and the increase in tourist traffic related to this. I cannot see where the plan addresses adequately the issues that the increased traffic would create.</p>	Objection noted.
	LPP04849	Habberley Road	Object	We object to this site for use by a travelling show-people for storage and accommodation. I believe it is inappropriate of this land use in the Green Belt as the site has significant landscape value.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
Campaign to Protect Rural England	LPP0937	Habberley Road	Object	We oppose the site at Habberley Road, Bewdley. This is in the Green Belt between Bewdley and Kidderminster. This is a strategic gap keeping the two towns apart and should not be eroded. The other sites are probably acceptable as Travelling Show people's yards.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission

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					documents.
	LPPO652	Habberley Road	Object	<p>Site located on a busy link road between Bewdley/Bridgnorth/Wolverhampton. A prominent site within a narrow strip of Green Belt, development here would inevitably lead to pressure to release the remaining Green Belt along the B4190 for development.</p> <p>Siting of fairground rides and equipment for significant parts of the year will be an unsightly incursion into what is now a beautiful landscape flanked by the ancient Wassell Wood.</p> <p>A more discrete location for this facility would be somewhere within the site of the now defunct Trimpley Gold Club which would also be very close to where this community of show people now reside.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO342	Habberley Road	Object	<p>The potential site for travelling show people at Habberley Road, Wribbenhall, Bewdley (WA/BE/6) is inappropriate. The site is situated in open countryside forming part of the Green Belt. It is opposite a substantial size hotel with leisure facilities which already generates significant traffic turning on and off the B4190 at the same point. The access to the site is quite steep for HGV's and is at 90 degrees to the highway making it awkward for turning into or exiting the site. Moving showground equipment often involves towing trailers behind HGV's and this would cause a significant hazard at the entrance to this site on a very busy "B" road. Although there is a 40mph speed limit this is regularly</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				ignored by bikes. There is no foul sewer drainage close by.	
	LPP0367	Habberley Road	Object	<p>As a nearby resident to the proposed travellers' site opposite the Mercure Hotel in Bewdley I would like to object to this proposal. This location is a very poor option. Bewdley is a rural area that should be preserved without encouraging green space to be used for this sort of development.</p> <p>The road network around this site would be poor, the road access is from a busy road which has historically had a number of accidents, some fatal. The junction at Catchems end is unsuitable for large travelling showpeople's vehicles to negotiate and this would need investment to change the junction. Also, as these vehicles try to manoeuvre into the proposed site they would cause a danger to other road users on this fast road.</p> <p>The location of this site would be unsightly to local residents and I am sure would impact on the trade at the Mercure hotel; their residents would not want to be near to such a site.</p> <p>This location I believe has a planning ruling on it that no encroachment onto the area between Kidderminster and Bewdley should take place due to a potential bronze age burial mound so again this is not a suitable site.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				Despite being earmarked for travelling showpeople it is clearly evident that once used for this sort of development it would enable living facilities for travellers to the site, something that is not required in such a prominent rural site in Bewdley. A more commercial type site would be better suited such as the Stourport or Kidderminster proposal.	
	LPPO368	Habberley Road	Object	<p>I would like to submit an objection to the proposed gypsy site on Habberley Road, Bewdley. I do not think this site is fitting of the surroundings. It is a Green Belt area, close to beautiful woods. This area should not be considered. By essence of being a traveller or gypsy they should not have a permanent site. There are more suitable sites in Stourport and Kidderminster that would suit. Or even the site used previously along the River Severn by black stone. At least it's not to near residential areas.</p> <p>Approving this application would set a precedent and open the surrounding areas to be subject to similar planning applications.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO1792	Habberley Road	Object	<p>Objects due Habberley site for travelling showpeople due to the following reasons:</p> <ol style="list-style-type: none"> 1. Travellers vehicles can be 60ft long with lorry and trailers combined. Difficult junction to negotiate at Catchems End. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>2. The twisting bends coming down the hill towards Habberley Valley are very dangerous even for motor cars.</p> <p>3. The road is not very wide and traffic is now tenfold over the past years.</p> <p>4. Cars and motor bikes exceed the speed limit past our property.</p> <p>5. Drivers do not anticipate the bends, exit points or other hazards hence the accidents that occur.</p> <p>6. Concerns for cyclists, tractors and horse riders.</p> <p>7. Litter is another problem with vehicles discarding rubbish, let's not add to it.</p> <p>8. The properties surrounding this site will be down graded in value and this is not acceptable.</p>	
	LPPO2813	Habberley Road	Object	<p>I would like to raise my objection to the proposal for the site for travelling showpeople and housing south of Habberley Road in Bewdley:</p> <ul style="list-style-type: none"> • Effect of proposal on thriving businesses in the area • Effect on wildlife • Joining of Bewdley to Kidderminster • Junction at Catchems end is not suitable for 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>large heavy vehicles and there is already traffic congestion from the Safari Park.</p> <p>There are many proposed options but I think many more solutions could be found and used rather than just going straight to Green Belt land.</p>	
	LPPO3510	Habberley Road	Object	<p>The B4129 is not suitable for the access of heavy vehicles. Already a busy road the turning of such large vehicles on and off the proposed site will cause safety issues.</p> <p>No means of limiting the impact of increased traffic in the area.</p> <p>The site is opposite a key tourist business for the area. The location of such a site so close to the hotel runs the very real risk of damaging the hotel's ability to attract visitors.</p> <p>Many local residents have invested heavily in the area and will reconsider if the surrounding area is significantly altered.</p> <p>Additional pollution in the area, the loss of natural habitat for the wildlife and the potential damage to a bronze age burial mound.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO3538	Habberley Road,	Object	We believe the potential traveller site on the Habberley road would be a mistake as it would have an adverse	Objection noted. The proposed sites continue to be evaluated to identify the

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		Bewdley		impact on the appeal of the local hotel as a potential wedding venue and golf course as an area of natural beauty.	most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO4151	Habberley Road, Bewdley	Object	<p>1/ Habberley Road - WA/BE/6</p> <p>My reasons for objections are;</p> <p>*A permanent site for travelling show people on the areas the above proposed sites would mean too great a difference in terms of the land's current and proposed intended use and in relation to the drastic difference compared with the use of the existing surrounding area i.e. one of Bewdley Town's established hotel with leisure facilities, established golf course, private dwellings and one of the areas aesthetically attractive tourist attractions.</p> <p>I have not had time to check but could this be in contradiction of Wyre Forest District Councils planning departments own strict guidelines regarding refusal of planning permission on the grounds of change of use?</p> <p>I inquire what the special circumstances are to justify the areas concerned as being an exception to the rule regarding building on rural land. I feel sure all of this would be taken into account as a reason for refusal if a local member of public applied for the same building</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>permission on these sites.</p> <p>* In my personal view the character of the approach to the well known Georgian town of Bewdley, which attracts many tourists to the region will potentially be detrimentally affected and that an erosion of Green Belt/ rural areas can lead to a 'sprawl ' of built up environments.</p> <p>* I recognize that "there is no right to a view" in legal terms, however loss of a view (whether it be by local residents or approaching visitors to the town of Bewdley) is not necessarily irrelevant when it comes to planning permission. The enjoyment of the current natural view and the rural character it maintains is an important part of the amenity and aesthetics of this area I feel that the effect of the proposed development on the character of the neighbourhood will be altered in opposition to its existing established historical and rural character that is enjoyed.</p> <p>Bewdley is a town known for its outstanding beauty, from a public view point and in keeping with the present government's promotion of 'Localism', I would hope that such matters are taken into consideration when they are raised by local people.</p> <p>* I am concerned about ongoing enforcement of correct status of use for the proposed sites. How will the local authority ensure present/ future owners & users of the</p>	

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				<p>development meet showground/ traveller status? Could I inquire as to the rigor, status criteria and check resources that would be put in place? I assume that these would have to be clearly presented and budgeted for with presentation of any planning permission.</p> <p>* Living in the area for the amount of time that I have, I'm aware of the amount of fatal and near fatal road traffic incidents on the Habberley Road. I feel that it is important to prevent any increase in traffic which could be generated by the establishment of a site using haulage type/ size vehicles onto and off this road. I fear an increasing adverse affect on current highway safety with larger vehicles 'swinging in/out of the site.</p>	
	LPPO4155	Habberley Road	Object	<p>It was with great regret that as residents in New Road for the past 46yrs we heard of the proposed developments for this area. Over those years the traffic flow has increased greatly with the Safari Park, The Mecure Hotel and extra housing. The work due to be carried out in time by the Safari Park will cause congestion. All traffic going into Bewdley, off the Habberley Road has to turn left causing congestion at the island. Habberley Road is not big enough to take larger vehicles especially on the bend past Habberley Valley. We do hope you will reconsider your plans.</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
	LPPO4174	Habberley Road	Object	<p>I would like to strongly object to the proposals laid out for Bewdley in the local plan review.</p> <p><u>Traveller site in Bewdley: (ref 8.36)</u> Residents recently</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be</p>

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				protested to any plans to bring traveller sites into Bewdley, once again I must site the visual impact on a main gateway to this beautiful conservation area that a traveller site will bring. The site is also opposite one of the main hotels.	included in the pre-submission documents.
	LPPO4180	Habberley Road	Comment	<u>Bewdley – Potential Travellers Site</u> WA/BE/6 – Habberley Road. I support the development of dedicated sites for travellers, and initially I thought this was a reasonable allocation. But now I wonder whether there may be a downside to having it virtually opposite the proposed new housing allocation south of Habberley Road (WA/BE/5).	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO4183	Habberley Road	Object	Object to the proposed Traveller site on Habberley Road, even if it is just for storage of Fun Fair equipment. It is almost opposite to the Mercure Hotel and would not be conducive to their environment, clientele or business.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO4192	Habberley Road	Object	Specifically in relation to Bewdley the site on the Habberley Road - for travelling showpeople would represent a significant intrusion into the green gap between Bewdley and Kidderminster.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
Bewdley Civic Society	LPPO829	Habberley Road	Object	Site WA/BE/6 policy 8F Habberley Road: Object to this site for use by travelling show-people for storage and	Objection noted. The proposed sites continue to be evaluated to identify the

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				accommodation. The use is a wholly inappropriate use in the Green Belt. The size and scale of vehicles and rides involved in the use would destroy the openness and have a very deleterious impact on the area's bucolic character and its tourism value generally.	most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP01791	Habberley Road	Object	<p>Objects to development on the Habberley Road site due to:</p> <p>The hotel brings in a lot of tourism to Bewdley and concern that business would be lost if the proposed site goes ahead.</p> <p>The site is of great interest as is the surrounding area due to the archaeological value.</p> <p>The site is close to Habberley Valley which again is a tourist attraction.</p> <p>Suggests the Ceramaspeed site as a preferable location with easier road access.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP01963	Habberley Road	Object	The show travellers site area. This does appear to be very close to the small town of Bewdley that draws many visitors from outside the area. Also it will be opposite the Mercure hotel which again draws visitors to the area. The very fact such a site would exist could encourage visitors to go elsewhere. Small rural towns like Bewdley rely very much on purposeful visitors and passing trade. The small market traders that come into	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>Bewdley could be deterred from trading in Bewdley. There are already as I understand areas within a not too greater distance of Bewdley that has provision for show and travelling people. I'm sure many objections would be against the removal of Green Belt land, of which there are already decreasing acres around the growing town of Bewdley. There are many areas within and just outside the main town of Kidderminster that are not Green Belt and crying out for regeneration and where school provision and medical provision is more readily available. The infrastructure of such a large town is more able to cope with demand that would be made by the movement of show travelling people and extensive housing than small towns and by the use of the ever daily decreasing use of our precious Green Belt land.</p> <p>It could be a major catastrophe allowing slow turning vehicles pulling caravans off and onto a site on that land.</p>	
	LPPO2176	Haberley Road	Object	<p>I wish to object for the following reasons.</p> <ul style="list-style-type: none"> • Previous planners ruled that there should be no encroachment of the area between Bewdley and Kidderminster. Also there is potentially a bronze age burial mound according to study of its planning history. • Site would be open to all travelling show people and would not be restricted to one user. • Use of this site for this would undoubtedly damage local business which would reduce 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>much needed revenue coming into the area.</p> <ul style="list-style-type: none"> • There are highways issues as this area already suffers heavy congestion as is now. Large vehicles would cause a dangerous aspect on such a busy road. Costly road restructuring would be required. • Damage to the environment due to building, increase in traffic - mostly big diesel lorries causing air pollution. <p>All in all a not very thought out local plan for Bewdley residents.</p>	
Bewdley Town Council	LPPO828	Habberley Road	Object	<p>Bewdley Town Council opposes the potential allocation of land off Habberley Road as a site for travelling showpeople (WA/BE/6 and Policy 8F). There is no requirement for this in the GTAA and the call for sites document references the site's proximity to a hotel and a golf course. This location is therefore not suitable due to its tourism value and poor access to the site for large fairground vehicles either through the town centre or using the junction at Catchems End if using the bypass</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
	LPPO3251	Habberley Road	Comment	<p>Travellers' site at Habberley Road Traffic problems with large vehicles would arise. Narrow Roads for large vehicles.</p> <p>Local business would be affected.</p>	<p>Comment noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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	LPP01589	Habberley Road	Object	More people will create too much traffic. New Road is already blocked off due to difficulty in crossing.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP03413	Heath Lane	Object	Object to the gypsy proposed, traveller and travelling show people site in Heath lane as dangerous because of the narrow roads, and is totally impractical.	Objection noted.
	LPP04669	Heath Lane	Support	Supports.	Support noted.
	LPP04676	Heath Lane	Object	In addition I oppose development in the area 'Captain's and the Lodge WFR/ST/1' which has been included in the Draft Plan as a 'Core' area, the Easter Park business development and the proposed Gypsy and Travellers site at Heath Lane.	Comments noted.
	LPP04685	Heath Lane	Object	I would like to oppose the Gypsy and Travellers site at Heath Lane (due to the very difficult nature and width of the road structures in that location).	Objection noted.
Wyre Forest District Council - Development Control	LPP01207	Heath Lane	Object	Land at Heath Lane should not be considered - Green Belt; Access issues, Neighbour issues (Islamic College) etc - this is not an appropriate site	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
Worcestershire	LPP01055	Heath	Object	We note that a site off Heath Lane, Stone is considered	Objection noted. The proposed sites

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Wildlife Trust		Lane		in this policy. The hedges in this site are known to hold nesting corn buntings (a species of principle importance listed under Section 41 of the NERC Act 2006) and any allocation here would need to take this into account and offer sufficient buffering space to maintain the population into the future. It seems very unlikely that this relatively small site can provide sufficient space to do this and so we would strongly recommend that it is not taken forward at this stage. In this regard we draw your attention to comments in paragraph 8.40 of the consultation document. Moreover it is important to recognise that any allocation here may have an in-combination effect on corn buntings in light of the potential for allocations to the east of Kidderminster proposed under Option A.	continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO2314	Heath Lane, Stone	Object	Policy 8F - Heath Lane Stone. This lane is a tight single track and unsuitable for large vehicles.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO4314	Heath Lane, Stone	Object	I strongly object to the proposed gypsy, traveller and travelling show people site at Heath Lane as impractical and dangerous due to the nature and size of the surrounding roads.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO4313	Land at	Object	Objects to proposed traveller site at Clows Top.	Objection noted. The proposed sites

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		Clows Top		Believes that the proposed conflicting dual purpose (Core Housing Site or Potential Site for Travelling Showpeople) is not conducive to the development of housing in Clows Top.	continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP01481	Land at Clows Top BR-RO-1	Object	<p>Objections to the proposed site at Clows Top Garage for the use of travellers show people.</p> <p>Potential use of heavy equipment with access causing an increase to traffic to the area causing safety concerns.</p> <p>A preferred option would be housing for the local community.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP01487	Land at Clows Top BR-RO-1	Object	<p>Objections to the proposed site at Clows Top Garage for the use of travellers/show people.</p> <p>Potential use of heavy equipment with access causing an increase to traffic to the area causing safety concerns.</p> <p>Would prefer the proposed site to be allocated for development of affordable housing which would better serve the local community.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP01494	Land at Clows Top BR-RO-1	Object	<p>Objects to the site being used for travellers/show people on the following grounds:</p> <ul style="list-style-type: none"> • Inadequate drainage • Site would be better used for housing • It will be difficult for large vehicles to use the 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>site and dangerous for other road users/cyclists</p> <ul style="list-style-type: none"> • May deter building of appropriate future housing which Clows Top is in need of <p>Would prefer to see the site used for housing rather than travellers/show people.</p>	
	LPP01507	Land at Clows Top BR-RO-1	Object	<p>It is a shame that the land cannot be used for houses to help local people stay in the area. The map used is not correct! <u>Worrying!</u></p> <p>No detail on use of site.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP01508	Land at Clows Top BR-RO-1	Object	<p>It is a shame that the land cannot be used for houses to help local people stay in the area. The map used is not correct!</p> <p>Is the site safe enough to take heavy weight?</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP01557	Land at Clows Top BR-RO-1	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> • Would prefer housing to be developed. • More houses would secure the future of local school, shops etc. • Safety concerns with the access location - especially for large vehicles and especially in winter months. • Concerns about extra noise and further demands on current infrastructure. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<ul style="list-style-type: none"> Concerns about the site being safe enough to take heavy weight. 	
	LPPO1558	Land at Clows Top BR-RO-1	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> Would prefer housing to be developed. More houses would secure the future of local school, shops etc. Safety concerns with the access location - especially for large vehicles and especially in winter months. Concerns about extra noise and further demands on current infrastructure. Concerns about the site being safe enough to take heavy weight. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO4315	Land at Clows Top BR-RO-1	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> Concerns of traffic climbing the hill and turning into the yard. Concerns about drainage. Services such as water, electricity etc. is inadequate. Concerns about the land stability. Village facilities (shop, butchers etc,) not adequate for more people. Same concerns if housing was to be put on site 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				rather than travelling show people.	
	LPPO4316	Land at Clows Top BR-RO-1	Object	<p>My objections and comments regarding the proposals of the land at Clows Top are as follows:</p> <ul style="list-style-type: none"> • Firstly regarding the travellers use, there are major concerns on the traffic climbing the hill, especially in winter. • I believe that there are also issues regarding main sewage. • The services at Clows Top are far from adequate – water pressure, power failing, also would the land be stable enough with all the heavy vehicles that would be using the land? <p>Regarding the housing proposals:</p> <ul style="list-style-type: none"> • Mains sewers are an issue • 3 proposed sites/plots with around to houses, the increase of vehicles will make things even more difficult to cross at the top. • Small corner shop/butchers would not be adequate for the extra increase in residents. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO4317	Land at Clows Top BR-RO-1	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> • Concerns about traffic climbing hill and turning into yard. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be

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				<ul style="list-style-type: none"> Concerns about drainage. Services not adequate in the village i.e. water pressure, electricity. Concerns about the stability of the ground. More traffic on busy, dangerous crossroads. Similar concerns with the housing proposal as well as the travelling show people. Village hall will be surrounded/closed in - could cause conflicts with residents. <p>Complaining about site plans as they are vague and not accurate.</p>	included in the pre-submission documents.
	LPP01460	Land at Clows Top BR-RO-1	Object	<ul style="list-style-type: none"> - Access to site A456 - Speed of traffic - No main drainage - Map is incorrect - No detail on use of site - No indication of number of families on site - This is already a dangerous crossroad A456/B4202. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP01465	Land at Clows Top BR-RO-1	Object	<p>Objecting to traveller/show people proposal at Clows top on the following reasons:</p> <ul style="list-style-type: none"> Limited visibility on exit of proposed site. A456 is already dangerous due to speeding - adding heavy vehicles pulling in and out on this road will increase the risk of danger. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<ul style="list-style-type: none"> Location already sees large vehicles mounting pavements for access causing erosion. <p>Would prefer something for the community or low cost housing for locals.</p>	
	LPPO3154	Land at former Clows Top Garage, Clows Top	Object	<p>Object to Clows Top site for travelling showpeople because:</p> <ul style="list-style-type: none"> Visual impact. Large equipment exiting the yard onto already dangerous cross-roads. Noise Drainage problems due to lack of mains drainage. Local primary schools already running at capacity. We do not object to the original approval of using the site for a housing development, which we feel would complete and enhance the village. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO1581	Land at Habberley Road	Object	<p>Objects based on the following reasons:</p> <ul style="list-style-type: none"> The road from High Habberley to Bewdley is dangerous already without the addition of many vehicles towing trailers and caravans. Perception that the site may have a negative impact on local residents due to devaluation of 	<p>Objection noted. This site was identified for Travelling Showpeople not Travellers.</p> <p>The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission</p>

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				homes and impact on the local hotel.	documents.
	LPP01582	Land at Habberley Road	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> • It is Green Belt land and shouldn't be developed. • Against previous planning. • Highways issues. • Could open more opportunities to develop on Green Belt land. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP01584	Land at Habberley Road	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> • Potential bronze age burial mound. • Should be no encroachment of the area between Bewdley and Kidderminster. • If this site was agreed for use by travelling show people its use could not be restricted to one user thus giving potential use for living facilities. • Highway issues with large vehicles turning on and off site on already busy road. • Could damage trade of 2 businesses near by which bring in much needed revenue. • Environmental issues. • Other sites more suitable. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP01590	Land at Habberley Road	Object	<p>Objects for the following reasons:</p> <ul style="list-style-type: none"> • Already busy road - especially at peak times. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal

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				<ul style="list-style-type: none"> • Important to preserve bronze age burial mound site and not subject this burial site to vandalism. • Adjacent to this ground is private ground where horses are kept. • Road junction Trimpley Lane and Habberley Road (B4129) already narrow and subject to long delays exiting and entering to Meadow Rise estate. • Too isolated to be policed properly or supervised environmentally. 	for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO1593	Land at Habberley Road	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> • Potential bronze age burial mound. • Should be no encroachment of the area between Bewdley and Kidderminster. • If this site was agreed for use by travelling show people its use could not be restricted to one user thus giving potential use for living facilities. • Highway issues with large vehicles turning on and off site on already busy road. • Could damage trade of 2 businesses near by which bring in much needed revenue. • Environmental issues. • Other sites more suitable. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO1588	Land at Habberley	Object	Objects due to a personal perception that:	Objection noted. The proposed sites continue to be evaluated to identify the

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		Road		<ul style="list-style-type: none"> Will deter people from The Mecure Hotel, attending the flower show in September and using The Pines Golf Club facilities. Already busy road. Traffic will only get worse. 	most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO4417	Land at Heath Lane, Stone	Object	<p>I am concerned about:</p> <ul style="list-style-type: none"> That the gypsy/traveller site is impractical in view of the lane being too narrow for large vehicles. 	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO2307	Land off Habberley Road, Bewdley	Object	Object to site for travelling people.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO1755	Land within Wilden Top	Object	<p>Long term local residents objecting to the proposals to build on land near their home. Lorries speeding daily. It' a rural area and they are concerned about bringing more traffic to the area and the impact it will have on their stress levels.</p> <p>Preferred site for housing is the site in Stone as it's away from people.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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	LPP03613	Land within Wilden Top	Object	<p>MI/21 – Wilden Top Classed as commercial?</p> <p>Residents assured that no more travellers/showmen sites would be allowed in Stourport; housing would be more appropriate.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
Taylor Wimpey West Midlands	LPP01524	Policy 8F	Comment	No comments.	No comments made.
	LPP02771	Policy 8F	Object	<p>We would like to bring to your attention that - perhaps unintended - the emerging policies 8F and 19 appear to be watered down in formulation compared to the equivalent prevailing policies SAL.DPL9 and SAL.DPL10 (titled: Wyre Forest District Council Site Allocations and Policies Local Plan 2006-2026 - Adopted July 2013).</p> <p>Policy 8F</p> <p>As Traveller, Travelling Showpeople, and Gypsy sites are essentially a residential use, the same requirements that apply for residential use, such as appropriate sewage and drainage arrangements, must also be met for this use. However, emerging policy 8F paragraph 8.40 suggests that applicants will only be required to demonstrate they have sought a connection to the mains foul sewer in the first instance and therefore the present wording seems to imply that appropriate sewage/drainage measures to residential standards do</p>	Comments noted. We will ensure the pre-submission documents are compliant with the NPPF and PPG and policies previously included in the last Local Plan therefore require revision.

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				<p>not necessarily need to be provided for this purpose.</p> <p>Policy 19</p> <p>Furthermore, it appears to us that the emerging planning permission policy (19) for Traveller, Travelling Showpeople, and Gypsy use on land that is not currently allocated for this use is much less strictly formulated than the equivalent prevailing policies as certain requirements to balance conflicting interests and to protect the interest of the settled community, such as SAL.DPL9 under i-viii and sequential test and SAL.DPL10 under part 1 sub i-viii and part 3, are not repeated in Policy 19.</p> <p>Questions:</p> <ol style="list-style-type: none"> 1. Would it not be preferable to clarify in Policy 8F that the same requirements that apply to residential development, such as appropriate drainage measures, should also be met when allocating a site for Traveller, Showpeople or Gypsy use? 2. Also, should Policy 8F not be formulated in a way that all necessary conditions should be met prior and not subsequent to such an allocation as a site can only qualify as appropriate if all requirements are met? 3. As per Policy 8F, would it not be preferable to clarify in Policy 19 that this use is 	

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				<p>predominantly residential with all its consequences?</p> <p>4. Furthermore, is it not preferable to incorporate all requirements of the prevailing policies SAL.DPL9 and SAL.DPL10 in the equivalent emerging Policy 19 assuming that there is no intention to water down the current criteria in balancing conflicting interests?</p>	
	LPPO3350	Policy 8F	Object	Sites for 'travelling show people'. Confine next to 'existing gypsy & traveller sites' on Sandy Lane Industrial Estate.	Objection noted.
	LPPO4668	Policy 8F	Comment	Comments that finding appropriate sites in the district for Travelling Showpeople is very important.	Comments noted.
Historic England	LPPO1271	Policy 8F	Comment	Policy 8E relates to potential development sites for Gypsy and Traveller Accommodation - what assessment has been undertaken as to the impact for the historic environment? How will these issues and opportunities be included within the Plan? This comment also relates to Policy 8F.	A Heritage Impact Assessment Study is being prepared and will be published at pre-submission stage. This study considers the sites and the potential heritage impacts. The purpose of the Heritage Impact Assessment is to support the Local Plan by demonstrating how the historic environment has been considered in the site selection process and to assess the likely impact on heritage assets, (both designated and non-designated) and whether any impact can be mitigated.
	LPPO2746	Policy 8F	Object	Believes that there will almost certainly be a negative	Objection noted. The proposed sites

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		Clows Top		<p>impact on local house prices.</p> <p>Questions the obligations of the local authority.</p> <p>In summary, strongly objects to this proposal and urges WFDC to heed the objections and concerns of residents, and those residents of adjacent communities.</p>	<p>continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p> <p>The site was one of 5 consulted on for a specific family of Travelling Showpeople already resident in the district.</p>
	LPPO1827	Policy 8F - Clows Top	Object	<ul style="list-style-type: none"> • The village is totally unsuitable to be considered as a prospective site for travelling/showground on the land that has been identified. • Access is poor due to the volume and speed of the traffic that uses the road in both directions. Large goods vehicles frequently experience problems in getting up the steep hill. These vehicles often have to swing wide to enter the yard and in doing so, mount the pavement. • The increased traffic noise would also be an issue that I would object to. • No stipulation has been made as to the number of vehicles using this yard, or indeed if the users would also be residing on the premises. There would be an issue with connecting to mains drainage. • Clows Top is a small village and the proposal of this kind would totally alter the appearance and safety of the village. • I agree that at present the land is an eyesore - it 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				would be put to far better use if a small housing site was proposed.	
	LPPO1957	Policy 8F - Clows Top	Object	<p>Clows Top is a small rural village and I don't think it would be appropriate to add a community that would be travelling. It would unsettle what is a settled community. Clows Top is already difficult in terms of traffic and large vehicles turning into and out of this site is a potential risk to all road and pavement users. I imagine that there could also be a noise problem.</p> <p>I do not think that Clows Top is an appropriate site to house the equipment, people and their accommodation and hope that this proposal is rejected by the Council.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO3017	Policy 8F - Clows Top	Object	<p>We would like to object strongly to the proposed traveller's site in the Clows Top Village Hall car park.</p> <p>A traveller's site would also put pressure on the local school which is already running at full capacity.</p> <p>We do not think that it is a good site because of it being near a busy cross roads.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO3498	Policy 8F - Clows Top site	Comment	<p>I am writing to express my concern at the possible new Travelling Show people site opposite The Mercure Hotel in Bewdley.</p> <p>My main concern is the thought of lorries towing caravans and trailers turning onto what is an already</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>busy road. It is an accident waiting to happen. While I am opposing this I wish to also show the same concern for the other suggested site at Clows Top for exactly the same reason. I was a resident of Clows Top for many years and I was heavily involved with the renovation and upkeep of the village hall. As with the Habberley Road site, it would be potentially dangerous to have such large vehicles entering and exiting on such busy roads.</p> <p>If these sites are opened, is it then opening the flood gates for more and more travelling families and their vehicles to use these sites? I understand they need to make a living and need somewhere to live but I also care about where I live and it really is a beautiful part of the country. It shouldn't be blighted by the sight of these large vehicles randomly coming and going, and possibly growing in community size over time.</p>	
	LPP02715	Policy 8F Habberley Road	Object	<p>One reason is that it is too close to legitimate homes.</p> <p>Another is that there is a proposal to build new houses in that area and a traveller's site would seriously bring prices of those down immediately.</p>	The site was proposed for Travelling Showpeople.
	LPP02719	Policy 8F Habberley Road	Object	Due to the proposed expansion of West Midlands Safari Park, nearby, the amount of traffic using the road network will increase. Therefore, adding the traveller site to the proposed area would cause further congestion with their large vehicles.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>Access at Catchem’s End and Kidderminster Road junction is unsuitable for large long vehicles in both directions.</p> <p>Access to and from the Habberley Road site could prove to be an accident area.</p>	
	LPPO2621	Policy 8F - Habberley Road	Object	<p>I object strongly to this policy for the following reasons:</p> <ul style="list-style-type: none"> • No market for this as we already have the West Midlands Safari Park and the Stourport fair. • More traffic in our quaint little town. • Diminish the atmosphere and respectability of Bewdley. • More rubbish. • It's an eye sore along with light and noise pollution. • Stretching the school system as well as the medical centre beyond its limits. • May attract undesirable characters to Bewdley. • Drop in tourism. • The Mecure will suffer. • Lower house prices. 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
	LPPO414	Policy 8F - Habberley Road	Object	<p>The Habberley Road site proposal for Travelling Showpeople poses a number of negative aspects:-</p> <p>1. The approach along Habberley Road would create a potential accident 'Black-spot' being directly opposite</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission</p>

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				<p>the Mercure Hotel entrance and just over a blind bend/rise on what become a very busy road. This road is also difficult to access from either north or south for large vehicles.</p> <p>2. This Green Belt land offers a sensible buffer between Kidderminster and Bewdley, we should really attempt to avoid the potential of closing the distances between populations.</p> <p>3. The site also has local historical interest being identified as bronze age links, similar to Wassell Wood and the roman sites of interest below.</p> <p>I believe brownfield sites should be considered in the first place, preferably out in the open countryside where businesses have previously traded.</p>	documents.
	LPPO1818	Policy 8F - Habberley Road, Bewdley	Object	The proposal for 'travelling show people' WA/BE/6 is framed in a very misleading way. The plans state 'potential site for travelling showpeople'. The reality is that these are also designated sites for 'gypsies and travellers'. I don't think the true intention of these sites has been made as visible as it should have been, hence people have not had the fullest opportunity to make a considered view.	The 5 sites in the policy were for a specific family of travelling showpeople currently residing in the district. They were not identified as sites for Gypsy and Travellers as there is no immediate requirement to provide pitches.
	LPPO5158	Policy 8F - Habberley Road site,	Comment	I am writing to express my concern at the possible new Travelling Show people site opposite The Mercure Hotel	Comments noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal

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		Bewdley		<p>in Bewdley.</p> <p>My main concern is the thought of lorries towing caravans and trailers turning onto what is an already busy road. It is an accident waiting to happen. While I am opposing this I wish to also show the same concern for the other suggested site at Clows Top for exactly the same reason. I was a resident of Clows Top for many years and I was heavily involved with the renovation and upkeep of the village hall. As with the Habberley Road site, it would be potentially dangerous to have such large vehicles entering and exiting on such busy roads.</p> <p>If these sites are opened, is it then opening the flood gates for more and more travelling families and their vehicles to use these sites? I understand they need to make a living and need somewhere to live but I also care about where I live and it really is a beautiful part of the country. It shouldn't be blighted by the sight of these large vehicles randomly coming and going, and possibly growing in community size over time.</p>	for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP0894	Policy8F Heath Lane	Support	Supports: Land at Heath Lane, Shenstone as a Travelling Showperson's Site within the Emerging Local Plan.	Support and comments noted.
Summerfield Against Land Transformation	LPP01623	Policy 8F - Heath Lane	Object	<ul style="list-style-type: none"> We reject the proposal for a Gypsy, Traveller and Showpeople site at Heath Lane based on its proximity to a school and the highly problematic road access. This site has been the subject of substantial local discussion and objection in the 	<p>Objection noted. This wasn't identified as a Gypsy and Travellers site.</p> <p>The proposed sites continue to be</p>

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				<p>past, and, without repeating at length previous objections, we once again reject this proposal.</p> <ul style="list-style-type: none"> • We reject the proposed gypsy, traveller and travelling show people site at Heath Lane as impractical and dangerous when judged against the Council's own site standards. • Provision for this community needs to be the subject of wider discussion across Authority boundaries to avoid a disproportionate concentration of such sites near one another. 	<p>evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
Rock Parish Council	LPPO1163	Policy 8F- Land at Clows Top	Object	<p>Rock Parish Council RESOLVED to oppose the use of land at Clows Top for Travelling Show People for the following reasons;</p> <ul style="list-style-type: none"> • Not an appropriate use of land in a visually high location within the district • No Mains Sewerage System at Clows Top • Lack of Transport links • Road Safety and Accessibility at Clows Top • Continuous Electricity Supply problems in the area • Noise & Nuisance • Lack of school spaces at Far Forest Primary School • Security issues in and around a potential site • Nothing has changed since the previous rejection of Clows Top for travelling show people in September 2011 	<p>Objection noted. This site was previously considered for Gypsies and Travellers as opposed to Travelling Showpeople.</p> <p>The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
	LPPO1976	Policy 8F Clows Top	Object	<p>I object most strongly to the potential site for travelling show people because:-</p> <p>- The travelling show equipment would be an eyesore</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be</p>

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				<p>right in the heart of the village.</p> <p>- There is no drainage on the site.</p> <p>- The local primary schools are at full capacity and would find it difficult to deal with the seasonal influx of children during the winter period.</p> <p>- I do not object to building houses on the site, which would enhance and complete the village.</p>	included in the pre-submission documents.
	LPPO1972	Policy 8F Land off Habberley Road	Object	<p>I object to the proposed travelling show people/gypsy site.</p> <p>Allowing this would be detrimental and poor publicity for Bewdley.</p> <p>After losing the coach parking from the town. Money would be better spent on re establishing the coach park.</p> <p>Previously refused for development.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO3278	Policy 8F - Land off Habberley Road, Bewdley	Object	<p>Having read the proposals for the Wyre Forest District Local Plan Review, I am objecting to the proposal for the development in Wribbenhall, Bewdley. (WA/BE/6).</p> <p>Highways Problems - The A456 and B4129 in Wribbenhall are already very busy, and to build a travellers site in this area would cause even more congestion. Travelling show people use large vehicles, so</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>turning on and off the Habberley Road will cause many issues.</p> <p>Loss of Green Belt - All this area is Green Belt land and previous planning inspectors have ruled there should be no encroachment of the area between Bewdley and Kidderminster. Planning history shows a site of historical interest on the Habberley Road.</p> <p>Tourism - The area attracts many tourists, some of which use the Mercure Hotel. Building a travellers site opposite could potentially damage trade.</p> <p>Environmental Issues - All of these plans raise many environmental issues.</p>	
	LPPO3279	Policy 8F - Land off Habberley Road, Bewdley	Object	<p>As a resident of Bewdley, I would like to object to the WFDC local plan review WA/BE/6 regarding land being used for travelling show people, opposite the Mercure Heath Hotel.</p> <p>My reasons for the objection being:</p> <ul style="list-style-type: none"> * This site could not be restricted to one user (circus or fairground travellers) and would encourage any travellers to the area, causing environmental damage and costing the taxpayer for the upkeep of the site. * This proposal could cause serious damage to the two 	The site would be owned and occupied by a specific Travelling Showpeople and therefore not open to other travellers.

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				<p>businesses close by.</p> <p>* The B4129 is a busy road and the large vehicles these visitors use would cause a highway issue.</p> <p>* Property value would decrease in Bewdley, especially the Wribbenhall side, due to this proposal.</p>	
	LPPO3281	Policy 8F - Land off Habberley Road, Bewdley	Object	<p>We are writing with reference and strong objection to the proposed land allocated for Gypsies, Travellers and Travelling Showpeople as outlined in Section 19 of the Local Plan Review.</p> <p>There are many reasons to oppose this proposal, as follows:-</p> <p>1.) The Proposal raises many environmental concerns within a protected Green Belt area. If the site becomes a traveller site then service utilities will need to be constructed.</p> <p>2.) If the proposed site was agreed for use by travelling showpeople its use could not be restricted to one user type and therefore bringing potential use for living facilities for other travelling groups.</p> <p>3.) The site is close to a number of thriving businesses that bring a lot of visitors and tourists to the area. By having a traveller site close to these businesses will potentially damage trade to not only these businesses</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>but also the Bewdley business community as a whole. Bewdley needs more hotels to attract tourists. It does not need a site that will deter tourists and potentially close down a good hotel.</p> <p>4.) The B4190 Habberley Road is a very busy road known for fatal accidents. Caravans, waste disposal trucks, construction traffic and other slow moving vehicles entering and exiting the site will increase the risk of potentially dangerous traffic, cycling and pedestrian issues.</p> <p>5.) Sites adjacent to the proposed site have been subject of previous planning applications and study of its planning history shows a potential bronze age burial mound and a planning inspectors ruling that there should be no encroachment of the Green Belt area between Kidderminster and Bewdley.</p> <p>6.) The travellers could dominate the local community within the Habberley Road area.</p>	
	LPPO2600	Policy 8F - sites for travelling show people (Bewdley)	Object	<p>The roads are becoming unable to cope with the traffic we have already.</p> <p>Bewdley, over the past few years, has had road closures beyond belief for gas, water and electricity.</p> <p>I am assuming we do not get added money for the infrastructure, waste, schools, policing, from central</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p> <p>The consultation was for a Travelling</p>

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				government.	Showpeople site and the demand for the site is evidenced in the policy.
	LPPO3290	Policy 8F - Wilden Top ADR, Stourport	Comment	<p><u>Proposed Travelling Showpeople Storage at Wilden Top (ADR)</u></p> <p>Storage of fairground rides etc is a commercial, industrial use which would be inappropriate for a semi rural residential area with narrow access roads and no footpaths. Surely a more suitable site can be identified on an industrial park or similar within the district? Stourport already has far more than its share of providing for travellers and we have been assured in the past that future provision would be better dispersed across the District.</p> <p>If this site is to be developed, housing would be more appropriate.</p>	Comment noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO2161	Policy 8F - Wilden Top site	Object	<p>I am writing in connection with the possible use of the site on the corner of Bigbury Lane and Wooden top road as a possible use for storage and residential facility for travelling showpeople. I would like to register my opposition to the allocation of this site for the following reasons:-</p> <p>This site is difficult to access for large vehicles and could only be made use of by extensive alteration to the surrounding roads, Bigbury Lane itself is almost inaccessible to large vehicles and Wooden top road</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				already suffers enough with the enforced use by Talbot transport vehicles, the edges of the road are constantly being damaged by this traffic.	
	LPPO3356	The Heath	Object	<p>1. Land at the site adjacent to this was previously refused planning as it was found to have Bronze Age burial mound. Also planning inspectors have previously ruled that there should be no encroachment on the area between Bewdley and Kidderminster.</p> <p>2. The B1429 is already a busy rd and I have no idea how large plant type vehicles will negotiate the turning Catchems End, not to mention any which find their way into ,which would mean that they would negotiate an historic bridge, and add to the already poor air quality in the town.</p> <p>3. The hotel is the only major hotel for Bewdley and this opposite would prove detrimental to their trade.</p> <p>5. Finally it is my understanding that other families would have access to this site if the proposal goes ahead.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO1690	WA/BE/5 Habberley Road	Object	<p>Ref: WA/BE/5 – consultation for change of use Habberley Road, Bewdley.</p> <p>We would like to express our strong objections to the change of use under consideration of the Green Belt area on Habberley Road for a site for travelling show</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>people.</p> <p>The B4129 is not suitable for the process of heavy vehicles. Already a busy road the turning of such large vehicles on and off the proposed site will cause safety issues for other road users. There will be no means of limiting use to sole occupancy and therefore the number of users on the site, equally no means of limiting the impact of increased traffic in the area.</p> <p>The site is opposite a key tourist business for the area. The location of such a site so close to the hotel runs the very real risk of damaging the hotel's ability to attract visitors. Not only is the hotel a large employer and consumer of services in the area but the hotel guests also bring much needed revenue to local businesses.</p> <p>You should bear in mind that many local residents have invested heavily in the area and will reconsider if the surrounding area is significantly altered, again taking much needed revenue away from the area.</p> <p>There are many environmental impacts to be considered – additional pollution in the area, the loss of natural habitat for the wildlife and the potential damage to a bronze age burial mound.</p>	
	LPPO2378	WA/BE/6	Object	I object to Habberley Road site:	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal

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				<p>It goes against all previous planning advice.</p> <p>Constant movement of traffic on/off the site. The B4129 is busy rural road extra traffic would make it very dangerous.</p> <p>Hotel/golf club will suffer</p> <p>Damage to the local environment/wildlife.</p> <p>Residents would be affected by noise/ability to sell property</p> <p>There is no legal obligation to provide land for any further housing in Bewdley.</p>	for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO3173	WA/BE/6	Object	<p>Opposite a busy hotel that provides a lot of accommodation to local tourists along with a number of other activities that bring money into the local economy.</p> <p>Is opposite a leisure centre that is very well used from early in the morning to late at night.</p> <p>Is on a very busy road so the requirement for large turning areas for numerous vehicles etc... is going to cause problems.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO3174	WA/BE/6	Object	<p>This site is opposite the biggest accommodation provider to tourists locally, on a road that already</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal

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				<p>sustains heavy traffic.</p> <p>The road is a fast one, with plenty of vehicles already turning into the Mercure either to stay at the hotel or to use the leisure facilities.</p> <p>The site is not that big that it could sustain much, so surely it would only be a matter of time before planning permission were applied for – previously turned down to other occupiers</p>	<p>for the Travelling Showpeople site will be included in the pre-submission documents.</p> <p>Officers have considered the Travelling Showpeople’s requirements in suggesting the 5 sites.</p>
	LPPO467	WA/BE/6	Object	<p>This against previous planning advice, there is potential damage to local businesses, highway issues this road is already very busy and would lead to more traffic, damage to local environment, effect on house prices for the area.</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>
	LPPO2831	WA/BE/6 Habberley Road, Bewdley	Object	<p>Considerable concerns at proposal to use the site for Travelling Show People:-</p> <ol style="list-style-type: none"> 1. Site could not be restricted to one user and could be used for permanent living facilities. 2. Sites adjacent have been refused planning permission due to the possibility of a bronze age burial mound and encroachment of the area separating Kidderminster and Bewdley. 3. B4129 is a busy road used by local residents and also 	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p>

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				<p>as a bypass for Kidderminster. A Travelling Show People Site would mean large vehicles needing to manoeuvre to access the site causing a serious safety and delay issue on the highway.</p> <p>4. Site is close to the Mercure Hotel and the Golf Club which brings employment and revenue to the local area and could be threatened by this proposal.</p> <p>5. The proposal raises many potential environmental issues.</p>	
	LPPO2096	Wilden	Object	<p>I object to travellers site at Bigbury Lane, Wilden:</p> <ol style="list-style-type: none"> 1. No knowledge of the plans 2. Possible property devaluation 3. Local travellers also oppose. 4. Strong, close community spirit. 5. Club/playing field adjacent to proposed site; users may go elsewhere 6. Poor access 7. Pay a higher tax band to live here. 8. Fly-tipping problem would worsen and dog walking land lost 9. Site in Stone has no nearby community 	Information on the Local Plan was posted to every household and advertised throughout the District.
	LPPO4761	Wilden	Comment	Land adjacent to Ceramaspeed, accessed at Zortech Avenue, and Wilden (M1/21) which are closer to main roads/drainage/commercial property.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal

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				An additional consideration is that for the travelling showpeople, easy access to main arterial roads to travel around the country would be advantageous.	for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO320	Wilden ADR	Object	Objects.	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPPO2966	Wilden Top	Object	<p>I would like to raise an objection to the 'Land within Wilden Top Area of Developmental Restraint, Wilden' site suggestion (Policy 8F p64). This area would be highly unsuitable for use by travelling showpeople for a number of reasons.</p> <p>Firstly, the surrounding roads/lanes are unsuitable for the large and heavy vehicles used by travelling showpeople. Access would be along either Wilden Top Road or Bigbury Lane. Both of these are narrow roads, often not wide enough for two average-sized cars to pass safely. Neither have pedestrian footpaths despite being used regularly by pedestrians, who would be put at greater risk by the additional, significantly larger traffic should this site be chosen.</p> <p>Secondly, the area suggested is a well used community area. Dozens of dog walkers and families use this land every day. We are in a beautiful area of countryside; most residents have chosen to live here due to the</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>access to such areas which you don't find elsewhere in Stourport. Ownership of the land was, supposedly, given to the local people as an amenity area and it would be a great shame to lose that.</p> <p>Thirdly, the location around Wilden Top is a quiet, semi-rural, residential area. Having a site for travelling showpeople which would be used for business purposes as well as residential would greatly increase the noise levels for the surrounding residents.</p> <p>Finally, the area proposed is home to a huge range of wildlife. These habitats would be destroyed by allowing the site to be developed and used by travelling showpeople. The area has previously been allotted as an 'Area of Developmental Restraint' and should be kept as such.</p> <p>The family of travelling showpeople currently own land on Heath Lane, Stone so in my opinion this would be the ideal place for them to reside.</p>	
	LPPO3007	Wilden Top	Object	<p>I am writing to give my views on the proposed plans for a Travellers site in Stourport. I understand there is a plan to build a Traveller site on land at Wilden Top. This seems to me to be grossly unfair as there is already adequate provision for Travellers in Stourport and as far as I am aware, there is none in Kidderminster or Bewdley.</p>	<p>The policy was for a travelling showpeople site. This would be an alternative provision for a family that currently reside in the District and differs from Gypsy and Traveller provision.</p>

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	LPPO3018	Wilden Top	Object	<p>The proposal for development at Lickhill Road North does compromise open land and will, without doubt, add extra pressure to a very busy junction.</p> <p>Areley Kings, Burlish Crossing and Wilden Top proposals all encroach on either Green Belt or open land which we should look to retain wherever possible.</p> <p>The fact there is no provision for infrastructure is extremely worrying and somewhat surprising.</p> <p>If the funds are available for such upgrades in Kidderminster why are they not available for Stourport & Bewdley?</p>	Comments noted. We cannot meet housing needs without using a small percentage of Green Belt land and will consider infrastructure requirements alongside the requirement to preserve the Green Belt where possible.
	LPPO3546	Wilden Top	Object	<p>M1/21 Location at Wilden top for potential traveller site.</p> <p>Wilden top is a beautiful piece of countryside that has suffered negatively from cheap housing in the past where residents on lower incomes have struggled to make a positive impact on this area whilst the village itself is a desirable location. If Wilden top was to have any development at all it should be to create a positive community, bringing Wilden top residents into the village, we have a cricket field and farm land, the motor cross and the railway for walks. More could be done to build better detached housing and regenerate the Wilden top estate, a decent park for the village, recreational, tennis or football club, a playing field for</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				<p>the school etc.</p> <p>Believes it would have a negative impact on the community, house prices, beautiful countryside, and nature, as well as putting pressure on Wilden school.</p>	
	LPP03647	Wilden Top	Object	<p>Concerned about the proposals at Wilden Top Area of Development Restraint (ADR). We would like to object to and express concern about the proposals in the LPRPO document, June 2017, to:</p> <ul style="list-style-type: none"> • Include the site as a potential site for Travelling Showpeople • Continue to include the site as an ADR for the development of housing <p>In addition to the substantial impact upon the rural and unspoilt nature of Bigbury Lane we have the following major concerns about the proposed development:-</p> <p><u>Concerns relating to the creation of a site for Travelling Showpeople</u></p> <p>A1. The physical layout of the site appears to be completely unsuitable for the development of a site for Travelling Showpeople.</p> <p>I believe the structure, composition and layout of the site make it completely unsuitable as a site for Travelling Showpeople and does not meet the criteria detailed in</p>	<p>Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.</p> <p>This site is already allocated as an ADR site. It was allocated as an ADR in a previous local plan that went through the examination process and became adopted.</p>

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				<p>the Baker Report. The Baker Report sought to identify a shortlist of potential sites for Gypsies and Travellers and for Travelling Showpeople. As it did not include the site at Wilden Top as a site for Travelling Showpeople it seems reasonable to infer that it was not deemed suitable at the time. After studying both the report and the site we cannot understand why it is now being proposed as a site for Travelling Showpeople. When assessing the site as a potential site for Gypsies and Travellers the Baker Report stated that most of the site was unsuitable except for a small area which offered an opportunity for four gypsy and traveller plots. The Baker Report, Appendix 4, states clearly that <i>“the central and eastern part of the site is an unsuitable location for development”</i> and details why. It should be remembered that only a small section of this site was proposed as a site for four pitches for Gypsies and Travellers, not as a site for Travelling Showpeople. It should also be noted that, this site is adjacent to a three story residential local heritage asset, inhabited by a young family, and therefore we would argue an inhabited site would have both a substantial impact upon privacy of this property and upon the privacy of any residents living on this site. We would question whether access to the site is wide enough. This site and several others were later <i>“ruled out of the consultation at Cabinet because of concerns regarding their suitability and deliverability”</i>. I believe that this decision was correct and do not understand why the site has been proposed as a site for Travelling</p>	

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				<p>Showpeople after rejection by these reports.</p> <p>In addition, the authors of the Baker Report appear to be unaware that the site borders onto two black and white “Mock Tudor Buildings”, which are included in the Stourport Local Heritage List, which identifies these as heritage assets that are valued as distinctive elements of the local historic environment that are not protected by statutory designations.</p> <p>The Local Plan Review Preferred Options Sustainability Appraisal Report states that all of the Stourport sites <i>“score well in terms of access to services apart from the sites at Wilden Top and Sandy Lane which are not so well served by facilities.”</i> The site scores negatively in relation to:-</p> <ul style="list-style-type: none"> • Improve and enhance the provision and accessibility to local services and facilities • To protect soil and land • To protect and enhance landscape and townscape • To maintain the integrity of the Green Belt within the District • To maintain and enhance community and settlement identities <p>I would like to suggest that this the scoring for the site in section 11 <i>(to protect and enhance the historic environment and it’s settings)</i> should be reclassified</p>	

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				<p>from N/A as the proposed development is adjacent to two locally listed buildings which are of local heritage value and would majorly detract from, not enhance, their setting.</p> <p>The LPRPO states that there is “<i>a specific current need for one family site to be allocated to accommodate</i>” the current occupants of the site at Long Bank. The Baker Report (page 21) states that the existing family of Travelling Showpeople have requirements, which include the following:-</p> <ul style="list-style-type: none"> • <i>to store the lorries, fairground equipment and to provide residential accommodation (caravans) for the 3 sons</i> • <i>ideally the site should be in the same general location (Long Bank, Bewdley)</i> • <i>should be at least 2 acres in size</i> • <i>needs good access to the road network</i> <p>When considering how the site would meet the requirements of the proposed tenants the Baker Report, 2011 lists some of the broad locational criteria for Travelling Showpeople sites (taken from the Showmen’s Guild of Great Britain Model Standard Package) which include:- The site should:-</p> <ul style="list-style-type: none"> • <i>be relatively flat</i> • <i>have good vehicular access</i> 	

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				<p>Other requirements identified by representatives of Town and Parish Councils include that the site should:-</p> <ul style="list-style-type: none"> • <i>fit in with existing communities</i> • <i>not result in the removal of hedges and should not have a landscape impact.</i> <p>The report also refers to Policy CP06 and includes the following specific criteria:</p> <ul style="list-style-type: none"> • <i>Neighbouring uses should be complementary to the amenities of the proposed site</i> • <i>The development of the site should not negatively impact on biodiversity or green infrastructure and should be capable of integration with the landscape character of the area.</i> • <i>There is safe and convenient vehicular and pedestrian access and that the site can be easily accessed by towing caravans</i> <p><i>Page 24 includes the following criteria – “The site will have a good residential environment and will not adversely impact upon neighbouring residential amenity”</i></p> <p>I believe that a brief walk of the site will demonstrate that the site fails to meet most of the criteria above, the site:</p>	

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				<ul style="list-style-type: none"> • is not flat - it includes “<i>steep slopes</i>”. The top section (currently used by dog walkers) is composed of some very uneven ground with substantial height variations. The lower field is at a substantially different level to the upper field and we cannot understand how vehicles could access, be accommodated by, or travel around the site. • does not have good vehicular access • is not near to the exiting location (Long Bank) • does not fit in with the existing community and would be sited next to two locally listed Mock Tudor Buildings and to houses accommodating families and children. • it is expected that it would result in the removal of hedges and would have a landscape impact. • neighbouring uses (family accommodation in locally listed buildings of historic value) are not complementary to the amenity of the proposed site. • the site would substantially negatively impact upon the biodiversity or green infrastructure and is not capable of integration with the landscape character of the area (see C2). <p>It has been noted that the size of the Wilden Top site (2.7 ha) is substantially larger than the other proposed sites. Assuming that the other sites are large enough to accommodate the family does this mean that the Wilden Top site would also allow additional pitches? Or are all</p>	

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				<p>of the other sites too small? A representative of the Council advised me that the site would only accommodate equipment during the winter months, not families. However, the Baker Report states that residential accommodation (caravans) is required for the 3 sons. It is assumed that these requirements also change over a period of time. It would be helpful if additional information could be provided about how the proposed site would impact upon the lives of local residents and how it would look from the roads/footpaths that border the site.</p> <p>A2. Lack of any suitable access to and from the site for large wide vehicles using the existing lanes.</p> <p>The absence of a footpath, which could offer protection to pedestrians from wide vehicles travelling along large sections of these roads further increases the risks to pedestrian safety.</p> <p>The site does not have good vehicular access or good access to the existing road network. It is accessed by narrow lanes, with large sections without footpaths to protect any pedestrians from the path of large vehicles. The road sign at the base of Bigbury Lane states “No HGV” and I cannot envisage how vehicles as high as the “Dingle View”/ Fun House would pass below the line of overhanging trees bordering large sections of the lane. As highlighted in the Baker Report, there is a gateway at the lower end of the site (within Bigbury Lane), but given</p>	

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				<p>the width of the lane at that point, it is difficult to envisage how a large vehicle such as “Dingle View”, or any other wide vehicle, could turn into the site as we anticipate that the turning circle would be insufficient.</p> <p>A3: The impact of noise on neighbouring properties produced by maintenance and repair work to equipment, reversing, loading and unloading metal equipment, and vehicle movement, which I understand may be undertaken on a site for Travelling Showpeople.</p> <p><i>According to the Local Plan sites for Travelling Showpeople “need to be designed in an appropriate manner which minimises any impacts on neighbouring uses and occupiers”</i></p> <p>As evidenced above we believe this site would have an enormous impact upon neighbouring residential properties, their occupiers and on nature conservation. It is anticipated that movement of equipment to and from bookings could create substantial noise to the detriment of the residents of local housing due to loading and unloading of metal equipment with the potential to wake young children sleeping in the neighbouring properties. A representative of the Council recently advised that this would only happen at the beginning and end of the season but having observed the Fun/Crooked House vehicle initially in a field at the site at Long Bank and then at the Far Forest Countryside</p>	

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				<p>Show this seems unlikely. In the past, the fair has been involved in the Three Kings Parade (an early evening event) which I anticipate would necessitate a return of the equipment to base late at night. It seems highly likely that the equipment would be moved between many bookings which must be scattered throughout the country during the year. It is anticipated that this movement of equipment could often involve loading and unloading, possibly during the early hours of the morning or very late at night. This could cause substantial noise disruption to neighbours. Would a site for travelling show people have restriction detailing when vehicles can be moved, loaded or unloaded?</p> <p><u>C: Concerns Relating to Both Proposals</u></p> <p>As far as I am aware , unlike the other sites included in the LPRPO it does not include an indicative number of dwellings for the ADR at Wilden Top or for the number of pitches proposed for a site for Travelling Showpeople, which makes it difficult to comment on the scale of the impact of the proposals. The number of dwellings or pitches proposed would obviously affect the scale of the impact of any development on the local area. Is it possible to provide this information? The Baker Report, Appendix 4, 2011, states that availability of the site “is currently unknown” - I assume that this is still the case as there appear to be no references in the document to the owners wishing to sell/ make available the land.</p>	

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				<p>The Planning Team should walk around the site before proceeding any further with this proposal as, in light of the points above, we cannot understand why this site is being considered as a potential site for Travelling Showpeople or retained as an ADR.</p> <p>C1. Any additional pedestrian footfall must substantially increase the risks to pedestrian safety on Bigbury Lane due to the narrowness of some sections of the lane and absence of a footpath along the majority of the lane. These risks would also be substantially increased by wide vehicles attempting to pass pedestrians on narrow sections of the lane where there is no footpath.</p> <p>Bigbury Lane is a narrow lane and is not suitable for any additional pedestrian traffic. One section is particularly narrow and bendy and is located on a hill, which can encourage traffic travelling downhill to gather speed. The creation of either a housing site (or a site for Travelling Showpeople) could potentially result in increased pedestrian footfall to the base of Bigbury Lane and could lead to major pedestrian/road traffic incidents. Although I imagine that any plans to create housing in the ADR at the top of Wilden Lane could include the creation of a footpath alongside such housing I cannot envisage how the lower section of Bigbury Lane could be made safe for pedestrians.</p> <p>Problems occur when motorists try to travel either up or</p>	

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				<p>down the Lane and encounter a vehicle travelling in the opposite direction. Cars often have to wait and sometimes pull onto the drive of private properties, in order to pass oncoming traffic. This can be further complicated by pedestrians trying to negotiate a safe route along the Lane, which must present a significant risk to pedestrian safety. Any increase to the footfall along this section of the Lane would, in my view, substantially increase this risk.</p> <p>At present I think most of the pedestrians from the housing estate at the top of the hill travel down Bigbury Lane.</p> <p>It has been suggested by a Local Councillor that some of the residents of the housing estate at the top of the hill, use Wilden Top Lane to access Hartlebury Road or use the public footpath that leads to the community centre to access Wilden Lane. I have visited this footpath and would like to invite other representatives of WFDC to do the same. The path includes several sections which have a very steep gradient, one section has many steps which would be not be accessible for anyone using a buggy or pushchair or for many older people. Therefore I believe that existing and additional pedestrians are most likely to use Bigbury Lane to access Wilden Lane. Some residents will not feel safe using an off road public footpath especially in the dark whereas Bigbury Lane has street lights. The top section of Hillary Road and majority of Wilden Top Lane do not have streetlights</p>	

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				<p>which, I expect, would encourage further pedestrian footfall along Bigbury Lane from any new development at Wilden Top when it is the dark.</p> <p>I think many people will understandably have to weigh up the risks between walking down an isolated footpath (with a steep gradient but with no traffic) to walking down a busy narrow lane with no footpath.</p> <p>Bigbury Lane is also frequently used by horse riders, which can add to the risk from traffic and pedestrians trying to pass in narrow sections of the lane.</p> <p>Any significant housing development in the Wilden Top ADR, even if it included the provision of a footpath in that section of the Lane, would substantially further reduce road safety along the lower section of Bigbury Lane where there is no footpath. This is particularly important given the high volume of young families that walk down the lane to access Wilden Primary School, older children who access the bus route to Stourport High School, and workers who walk to bus routes and the main road via Wilden Lane.</p> <p>C2. Destruction of the natural environment and the impact upon local wildlife, particularly some protected species including the local bat population.</p> <p>It is expected that the development of any new housing would completely destroy the habitat of resident wildlife</p>	

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				<p>and a site for Travelling Showpeople, to a slightly lesser extent, could destroy the habitat of and displace local wildlife.</p> <p>This piece of land has been allowed to grow wild for a significant period. Any development, either a site for Travelling Showpeople or a housing development could destroy local wildlife, which may include protected species.</p> <p>The land located at Wilden Top was taken out of the Green Belt in 1989 and designated as an Area of Developmental Restraint and this designation has not been adjusted since then. However as this action was taken 18 years ago I believe that there is significant reason to review this decision.</p> <p>During the last 18 years the land in question and the surrounding land, at the top and middle of Bigbury Lane, must have matured further and I believe that the site is now home to a broad spectrum of wildlife. I believe that before any plan for housing or for the creation of a site for Travelling Showpeople is approved an independent bat survey and a full wildlife survey should be undertaken in order to assess the potential impact of any development upon the environment, particularly any protected species of wildlife nesting and living within this site.</p> <p>Bats have been observed frequently in the gardens of</p>	

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				<p>the houses immediately below the proposed site at Wilden Top. Without a thorough independent survey there is a major risk that substantially changing the nature of the Wilden Top site either as a housing development or a site for Travelling Showpeople could risk breaking the law if it causes “<i>damage or destroy a breeding or resting place</i>” or “<i>obstruct access to their resting or sheltering places</i>” .</p> <p>C3. Exacerbation of existing congestion issues in Bigbury Lane.</p> <p>Difficulties are frequently experienced in passing oncoming traffic and in parking, particularly in the middle and lower sections of Bigbury Lane. This would be made much worse by the increased volume of traffic that would accompany a new housing development but would also be exacerbated by any additional traffic, particularly wide vehicles.</p> <p>Bigbury Lane already suffers from major congestion and a lack of adequate parking spaces. There is not sufficient room for visitors to residential properties to park.</p> <p>Passing vehicles frequently have to pull over to allow traffic to pass, either in the stopping places or sometimes onto the edge of private driveways in order to pass oncoming vehicles, often causing tailbacks.</p> <p>Increased congestion and parking issues also increases</p>	

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				<p>the risks to pedestrian safety as pedestrians have to navigate between and around vehicles without a suitable footpath.</p> <p>Any additional proposed housing development must increase the number of vehicles and pedestrians using the lane, exacerbate parking issues and thereby further increase the risks to pedestrian safety. Would it be responsible to propose a development at Wilden Top that would create these problems, particularly as it could pose a threat to public safety by encouraging and increasing pedestrian footfall in this steep narrow lane, mostly without a footpath, used by many families and other pedestrians to access the local school and Wilden Lane.?</p> <p><u>Conclusion</u></p> <p>In the light of the information above we would like to object to the proposals for the site at Widen Top to either create a site for Travelling Showpeople or to continue to allocate the site as an Area of Development Restraint. Due to the number and gravity of our concerns my neighbour and I would appreciate the opportunity to meet representatives of Wyre Forest District Council at or adjacent to the site to discuss our concerns and how, or if, they can be addressed before any of these proposals are included in the next version of the Proposed Local Plan.</p>	

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	LPP04018	Wilden Top	Object	<p>I do not believe the land at Wilden Top is suitable for travelling show people.</p> <p>The road infrastructure is too narrow to cope with extra vehicles and the lack of footpath makes it dangerous to pedestrians. Bigbury Lane is sometimes blocked by delivery vehicles. The alternative route to the school is via steps so unsuitable for those with pushchairs.</p> <p>Accessing the site from Wilden Top Road would be dangerous to pedestrians as there is no footpath. The sides of the road are already worn away by vehicles.</p> <p>Property prices would be affected as would wildlife and the community. Wilden is a rural area used by cyclists and ramblers etc.</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
	LPP04667	Wilden Top	Support	Supports.	Support noted.
Stourport on Severn Civic Society	LPP01303	Wilden Top ADR	Comment	<p>We feel this is a commercial, industrial use which would be inappropriate for a residential area with narrow access roads and no footpaths. A large number of children walk past this site travelling to and from school. This increases the risk of road accidents.</p> <p>Stourport already has the “lion’s share” of providing facilities for travellers and we have been assured in the past (2011, 2012, 2014) that future provision would be</p>	Objection noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.

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				dispersed across the District. If this site is to be developed, housing would be more appropriate.	
	LPP04760	Zortech Avenue	Comment	Land adjacent to Ceramaspeed, accessed at Zortech Avenue, and Wilden (M1/21) which are closer to main roads/drainage/commercial property. An additional consideration is that for the travelling showpeople, easy access to main arterial roads to travel around the country would be advantageous.	Comment noted. The proposed sites continue to be evaluated to identify the most suitable site and the final proposal for the Travelling Showpeople site will be included in the pre-submission documents.
Land Research & Planning Associates Ltd	LPP0556	8.1	Comment	Unconvinced these figures are realistic and can be proven to be an up-to-date OAHN.	Comments noted.
	LPP03629	8.1	Object	The 2017 objective assessment of housing needs report states that we need 300 new dwellings P.A totalling 5,400 new dwellings. However this is contradictory to our population increase figures as they have predominately remained static. I believe that every area within the Wyre forest should have a representative group working alongside the council to compromise on the amount of development they are comfortable with, taking into account local needs. It is vital that villages are kept as villages and not merged onto existing town boundaries.	The OAHN has considered a range of housing numbers based on different economic forecasts and is the standard methodology available at the time. The OAHN will be revised in light of the standardised methodology proposed in the NPPF.
Wyre Forest Green Party	LPP01397	Housing Need	Comment	1. The guidelines set out in the National Planning Policy Framework states that we should consider only future scenarios that could reasonably be	The OAHN has considered a range of housing numbers based on different economic forecasts and is the standard

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				<p>expected to occur. The population of the Wyre Forest has only grown slightly since 1991 and remains fairly static. After a decade with a population increase of only 1.1% between 2001 and 2011, the population then only increased by a further 1.1% from 2013 to 2015. This equates to a 2.7% increase in population growth from 2001 to 2015 (point 2.3 of the Objective Assessment of Housing Needs ‘OAHN’ Report May 2017).</p> <p>2. The National Statistics Sub National Population Projections (SNPP) 2014 evidences a growth of population for the outlook period at 4.7% with a requirement of only 199 dwellings per annum. This is significantly less than the projection in the WFDC Local Plan Review which states the need of 300 dwellings per annum (this must be based on a 7.7% increase). This would give us a 285% higher rate of growth than in the last 10 year period which is completely improbable.</p> <p>3. If we used the SNPP recommendations for building 199 dwellings per annum over the stated 15 year period, we only need to build 2,985 dwellings in total - which negates the need to take Green Belt land around the District and reduces the WFDC consultation figures by 2,415 houses.</p> <p>4. The consultation document (section 6A) assumes 300 dwellings per annum should be required, but even the PG Short Term Data</p>	<p>methodology available at the time. The OAHN will be revised in light of the standardised methodology proposed in the NPPF.</p> <p>Please see the comments given above to explain the range in numbers that will support the Council’s aspirations for economic growth.</p> <p>We will follow the government’s standardised methodology for housing need when published in 2018.</p>

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				<p>shows an increase of 5.8% which is twice the growth of the last 15 year period and still only has a need for 229 dwellings per annum. This is 1,278 dwellings less than currently assumed.</p> <p>5. No allowance has been made for the age profile of the Wyre Forest population leading to increased mortality rates and hence increased availability of property in the district. It is likely that many properties will come free over the next 15 years as people downsize, move to Care homes, live with children outside the area or die.</p> <p>6. We firmly believe that growth figures will be less than 5.8% based on national projections and taking account of the recent cutbacks in the carpet industry in Kidderminster. Along with the forthcoming government attempts to reduce immigration, this will bring the figure close to the 2.7% experienced over the last 15 years.</p> <p>7. The Amion Report (which was used for the calculations projected in the Local Plan) assumes a much higher rate of population growth than the actual growth within the Wyre Forest over the past 15 years and we believe it is therefore flawed.</p> <p>8. The OAHN Report says that the number of vacant properties in the Wyre Forest is 3.2% and that there are currently 44,490 dwellings in the area. The Report increases the allowance for vacant properties to 4.5%. Increasing the</p>	

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				<p>vacancy rate by 1.3% means that the housing demand has been unnecessarily increased by 578 dwellings (or 39 per annum).</p> <p>9. Consequently, the need for new dwellings in Wyre Forest up to 2034 will realistically be under 3,000 and therefore the need to use any Green Belt land is unnecessary.</p> <p>10. We would also like to remind the WFDC that they do not have to accept the Objectively Assessed Housing Need (OAHN) targets for housing, especially if they have large amounts of Green Belt or other protected land. Indeed, Brighton and Hove, Watford, Hastings and Crawley have recently set housing targets of only half their assessed need.</p>	
Summerfield Against Land Transformation	LPPO1618	OAHN	Comment	<p>We believe that OAHN to be a deeply flawed piece of work and that the projected level of growth in housing need to be an unsafe basis for the Plan.</p> <p>The OAHN focuses upon local demographic, economic and housing market analyses. We have real concerns about this body of work and the weight given to it in the draft Plan. Firstly, we take exception to the methodology which is largely desk based research. The net result is a blizzard of numbers covering a wide array of projections, especially population projections, which are so wide and couched in so many caveats as to be meaningless. It is difficult to understand why the plan inflates population</p>	The OAHN has considered a range of housing numbers based on different economic forecasts and is the standard methodology available at the time. The OAHN will be revised in light of the standardised methodology proposed in the NPPF.

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				<p>growth when the data are open to widely differing interpretations and do not support the assertions in the draft Plan.</p> <p>The other methodological flaw is the “on-line survey of key stakeholders” and interviews with estate and lettings agents. In terms of the on-line survey the survey population is not numerically defined so a response rate cannot be determined and thus the value of the exercise and the representativeness of the yield. Whilst qualitative information is of value in support of a quantitative survey, the quality of the work on both fronts is so flawed as to render the findings meaningless.</p> <p>We reject the argument and the evidence upon which it is based as deeply flawed and believe the projected level of growth in housing need to be an unsafe basis for the Plan. In addition, given the high property vacancy rate (3.2%) in Wyre Forest it is difficult to understand the enthusiasm for such a scale of house building.</p>	
	LPPO3815	8.1	Object	<p>I strongly object to the Council’s development strategy; the OAHN shows different Affordable housing need to the figure used by the Council which is based on its own contractor analysis dismissing 3 nationally acclaimed analysis.</p> <p>The so called evidence is flawed and biased towards large scale development regardless of its suitability combined with a flawed drive to obtain an eastern</p>	<p>The OAHN has considered a range of housing numbers based on different economic forecasts and is the standard methodology available at the time. The OAHN will be revised in light of the standardised methodology proposed in the NPPF.</p>

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				bypass that will starve Kidderminster of valuable custom. The statement contradicts paragraph 8.2 which says that the housing market is stable and stakeholders believe there is no market for extra homes.	
	LPP0490	8.2	Support	We are currently a stable authority the large scale development suggested in this review will destabilize the District for the future.	Comments and support noted.
Persimmon Homes Limited	LPP01430	8.2	Object	<p>Wyre Forest is a “largely self contained Housing Market Area”, this ignores the fact that 38% of residents in employment work outside of the area mainly in The Black Country and Birmingham. Housing overspill from these areas needs to be accommodated in the adjoining shire authorities, homes in Wyre Forest areas will be occupied by people currently residing in the Black Country and Birmingham or who will migrate into the region and will live in Wyre Forest whilst commuting to the higher order economic centres.</p> <p>The Black Country Authority and Birmingham authorities are essentially reliant on the reuse of providing developed land to meet the numbers identified within their administrative areas but many of these sites have environmental and technical problems which are likely to delay their release assuming that these difficulties can be overcome at all.</p> <p>Objects to the plan’s failure to properly account for the housing overspill implications of the adjoining conurbations.</p>	The council will continue with its duty to cooperate with neighbouring authorities but the recently published GL Hearn study indicates that the Black Country can meet its own housing need.

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	LPPO3631	8.3	Object	While homeownership should be encouraged where possible, we have to take into account our economical climate and believe it to be nearly impossible for local residents to afford homes, especially the executive types. We fall into the danger zone of attracting second home buying, this defeating the object of catering for local needs. I do believe that further research needs to be carried out and believe this can be best achieved by having a designated representative work alongside local resident groups or neighbourhood plan groups, to identify more closely what each district requires.	Comments noted. The Council will support the provision of a range of housing to meet identified needs.
	LPPO3816	Paragraph	Object	I object to the Council's development strategy and to Policy 8A which promotes a density of 35 houses/hectare. This needlessly consumes land and spreads development out rather than concentrating housing in the town centre where it is most needed. Building out horizontally is flawed where land availability is limited and may cause problems for future generations; instead well designed higher blocks work well in urban areas avoiding the need to spread out.	The Council will follow NPPF requirements with regards to density.
	LPPO3634	8.4	Object	The local plan needs to plan positively for a mix of housing based on assessment of the population growth of the people living in that district.	The housing need for the Local Plan is based on population data which includes births and death rates. It is also based on household projections. This information is shown in the Objectively Assessed Housing Need (OAHN) study.
Worcestershire	LPPO1142	8.5/8.7/8.8	Comment	We welcome the recognition of the need to provide	Comments noted.

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County Council, Planning Economy & Performance				homes to meet the needs of the elderly and those with disabilities.	
	LPPO3683	8.8	Object	<p>8.8 The list of homes does not correlate with the strategic review. There are many executive homes however the employment in Kidderminster is not available.</p> <p>35 Dwellings per hectare is too densely populated.</p> <p>How does the build homes for rent add to the growth developments for Kidderminster?</p>	The Council will follow NPPF requirements with regards to density.
	LPPO2162	Housing Stock	Comment	<p>A detailed response received regarding the proposed development to the east of Kidderminster. A part summary of this response is listed below:</p> <ul style="list-style-type: none"> • It is constructive to engage with Wyre Forest District Council about how the Green Belt land is developed in a more sensitive and thought through manner. • Wyre Forest has an ageing population. I believe there is sufficient housing within Wyre Forest for young families but these homes are currently occupied by older generation. Hence, the actual housing need is probably for residents 45-64 & 65+. Providing homes for these groups will free 	Comments noted.

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				<p>up existing family housing stock. This 'existing stock' is already in the correct location.</p> <ul style="list-style-type: none"> • Development to the east will be very popular to the overspill of commuters who travel to Birmingham but are priced out of Hagley. By building on the Green Belt, Wyre Forest residents may lose out on beautiful countryside, yet may not end up benefiting from the development? Can purchase of these new properties be restricted to residents associated with the area? For example: <ul style="list-style-type: none"> ○ Residents that currently live in Wyre Forest and have done so for 5 years. ○ Residents that previously lived in Wyre Forest for 5 years. ○ Residents who are related to a family member that has lived in Wyre Forest for 5 years. • It is important to ensure, whatever developments go ahead in the areas of Green Belt within Wyre Forest, that these developments benefit Wyre Forest. • Older residents should be encouraged to move out of their larger homes by new homes being designed to meet their needs: <ul style="list-style-type: none"> ○ two parking spaces and a guest space ○ some garden ○ at least two spacious bedrooms ○ a bathroom each ○ a study/office area (could be a bedroom, 	

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				<p>hence 3 bed)</p> <ul style="list-style-type: none"> ○ a garage or outhouse building for garden items ○ separate utility ● As Green Belt areas are being considered for development, perhaps modern barn complexes that look aesthetically pleasing across countryside views should be considered? These would be relatively expensive for a two / three bedroom however, relative to the equity saved up in a family home, the hope is they would be affordable to the target market. <ul style="list-style-type: none"> ○ These modern barn complexes could be spread out in more of a lane fashion retaining adjacent fields to be used for cycling, dog walking and the general enjoyment of the whole community. ○ In terms of traffic, the lanes should access more than one major road, for instance the A448, the Birmingham Road and Deansford Lane (leading to the Worcester Road); if located in ‘Stone Hill North’ core site for example. The majority of target residents would not add to the existing morning commute traffic issues in the area as they are already retired. 	
	LPP03817	8.8	Object	I object to the Council’s development strategy; it is a	Please see the Infrastructure Delivery

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				mistake to attract people to the area without assessment of the skills needed compared to those existing. The policy is flawed and unsustainable and will harm the area creating more strain on infrastructure/health services for little reward.	Plan.
	LPO300	8.9	Comment	The need for affordable housing and/or starter homes in Bewdley particularly needs to be addressed.	Comments noted.
Land Research & Planning Associates Ltd	LPO557	8.9	Comment	<p>Figures demonstrate at POLICY 8B of 100 minimum average target a continual shortfall of 50% per annum of affordable homes. This is an ongoing compounding unacceptable problem not being properly addressed. Certainly not by implementing OPTION A</p> <p>There needs to be a new mode of thought as to how to deal with this shortfall. The proposals suggested herewith in this overall representation would go a long way in dealing with this.</p>	The requirement for affordable housing must be balanced with what the market will deliver. Based on previous rates of delivery and in consultation with Registered Providers we believe 100 units is a realistic figure.
	LPO3818	8.9	Object	I object to the Council's development strategy/Local Plan proposals. Policy 8B contradicts policy 6A in the amount of affordable housing proposed. Facts should be right before going to consultation hence this should be reassessed by external inspectors.	Comments noted.
Rentplus	LPO1110	Affordable Housing Definition	Comment	The definition should be removed from the Reasoned Justification as replication is unnecessary and may, in light of the White Paper proposals, be quickly superseded.	Agreed.
	LPO2119	Affordable	Comment	I understand that any houses built on Green Belt will be	It is not clear where this information has

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		Housing		a minimum price of £200,000? That is not affordable. Young people in full time employment can not afford to get on the property ladder. Affordable housing needs to be large enough for families from the Wyre Forest to live in. There are approx. 2,400 on the council housing waiting list and the plan is to build 90 affordable each year? That doesn't seem nearly enough affordable homes. Is it because the council will get more investment for the more expensive houses?	been obtained from. For Shared Ownership (affordable housing for sale) it is usual to purchase a 50% share and therefore valued at around 50% of the open market price but percentage purchased can be lower. For more information visit the Help To Buy website.
	LPPO3834	8.11	Object	I object to the Council's development strategy; there is confusion over the amount of affordable housing proposed by the Council compared to the analysis/statements in the review document. This confuses the public as to the Council's intentions. The process is flawed and should be repeated after the documents have been redrafted. I object to these sections pending clearer information.	The OAHN expresses a range depending on economic forecasts. It follows the government guidance on OAHNs available at the time and will be updated in line with changing guidance in the NPPF / PPG.
	LPPO3835	8.12	Object	I object to the Council's strategy and thinking. There is confusion to the public over the numbers of affordable housing proposed by the Council compared to the analysis and various statements throughout the review document. They should be repeated after the documents have been redrafted. I object to these sections pending clearer information.	The OAHN expresses a range depending on economic forecasts. It follows the government guidance on OAHNs available at the time and will be updated in line with changing guidance in the NPPF / PPG.
Land Research & Planning Associates Ltd	LPPO558	8.13	Comment	Modify plan where landowners adjacent to or close by existing smaller settlements allow a minimum of 50% affordable homes or starter homes will start to address this problem without affecting viability issues.	Comments noted. The percentage of affordable housing is based on viability studies and government policy.

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Worcestershire County Council, Planning Economy & Performance	LPPO1359	8.13	Comment	In the third line, "housing rented" should be "rented housing".	Comments noted.
	LPPO3836	8.13	Object	I object to the Council's strategy and thinking. There is confusion to the public over the numbers of affordable housing proposed by the Council compared to the analysis and various statements throughout the review document. They should be repeated after the documents have been redrafted. I object to these sections pending clearer information.	Comments noted. The percentage of affordable housing is based on viability studies and government policy. The full technical papers are on the Councils website.
	LPPO3837	8.14	Object	I object to the Council's strategy and thinking. There is confusion to the public over the numbers of affordable housing proposed by the Council compared to the analysis and various statements throughout the review document. They should be repeated after the documents have been redrafted. I object to these sections pending clearer information.	Comments noted. The percentage of affordable housing is based on viability studies and government policy.
	LPPO3838	8.15	Object	I object to the Council's strategy and thinking. There is confusion to the public over the numbers of affordable housing proposed by the Council compared to the analysis and various statements throughout the review document. They should be repeated after the	Comments noted. The percentage of affordable housing is based on viability studies and government policy.

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				documents have been redrafted. I object to these sections pending clearer information.	
Wyre Forest Community Housing	LPP01671	8.16	Comment	<p>We note that in section 8.16 the District Council has highlighted the issues relating to the affordability of homes in the District's rural areas.</p> <p>We encourage the Council to consider affordable housing provision on a range of sites within, and adjacent to, settlement boundaries including development on green field and Green Belt land. This approach is supported by the National Planning Policy Framework.</p>	Comments noted.
Land Research & Planning Associates Ltd	LPP0559	8.2	Comment	The proposed percentage is far too restrictive where landowners should be encouraged. It should not expect willing landowners to have to provide supporting evidence.	Comments noted.
	LPP03637	8.22	Object	Self build and custom housing I am in favour of. I would request that you arrange a point of contact for all on the list to be able to meet and give suggestions for allocated spots to consider. As I notice there are 45.	Please contact the Council's Community Led Housing co-ordinator.
	LPP03839	8.23	Support	I support the paragraphs and statements therein for 8.23 to 8.25.	Support is noted.
	LPP04725	8.24	Comment	I know that you have considered self build under 8.24 but can I again make a plea that a proportion of any development site is offered to local builders as opposed to the large multi national builder (Taylor Wimpey et al). This would give more local employment and would also	We will include a revised policy on self/custom build in the pre-submission document.

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				ensure that we don't end up with the same old housing designs across the development. We would go back to streets looking different from each other rather than the same.	
	LPPO3840	8.24	Support	I support the paragraphs and statements therein for 8.23 to 8.25.	Support is noted.
	LPPO3841	8.25	Support	I support the paragraphs and statements therein for 8.23 to 8.25.	Support is noted.
	LPPO3638	8.25	Object	Self build and custom housing I am in favour of. I would request that you arrange a point of contact for all on the list to be able to meet and give suggestions for allocated spots to consider. As I notice there are 45.	Please contact the Council's Community Led Housing co-ordinator
	LPPO307	8.29	Comment	Para 8.29 should also mention dependant relatives.	Comments noted.
	LPPO3842	8.36	Object	I support the paragraphs and statements therein for 8.36.	Support is noted.
	LPPO3635	8.0.2	Object	Table 8.0.2. The housing needs should make the top 3 highest % rates priority developments this being elderly accommodation, affordable homes to rent and affordable homes to buy, before any other strategy for development plans.	Comments noted.
	LPPO2930	Table 8.0.4	Object	Rural area housing mix would not be helped enough through the policies of the LPR The LPR recognizes (table 8.0.4) the inability of local	Comments noted. The Council supports development in rural areas where it is in sustainable locations and meets identified local housing needs.

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				<p>people to afford to purchase an averagely priced house in several parishes- all over 80%. For the statistically significant parishes, such as Rock, the Core Sites at Far Forest and Bliss Gate will make little difference to this circumstance over the plan period or in the immediate future. Given the significant lack of affordability and the 'presumption in favour of development' as identified as part of NPPG, more consideration should be given to small sites in rural areas that are brownfield and or windfall that may not be within designated settlement boundaries but are not 'isolated', in order to support particular elements of the housing market.</p>	
	LPPO2974	Table 8.0.4	Object	<p>Rural area housing mix would not be helped enough through the policies of the LPR</p> <p>The LPR recognizes (table 8.0.4) the inability of local people to afford to purchase an averagely priced house in several parishes- all over 80%. For the most significant parishes, such as Rock, the Core Sites at Far Forest and Bliss Gate will make little difference to this circumstance over the plan period or in the immediate future. Opportunities for small sites that are in a rural area, brownfield and or windfall, might emerge in the plan period. Given the significant lack of affordability in rural localities and the 'presumption in favour of development' as identified as part of NPPG, more consideration should be evident in the plan to support particular elements of the housing market beyond 'affordable' housing.</p> <p>Rural areas can contribute more to housing mix</p>	<p>Comments noted. The Council supports development in rural areas where it is in sustainable locations and meets identified local housing needs.</p>

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				<p>without detriment to landscape and sustainability. Government guidance (NPPF- Rural housing 19 May 2016) considers rural housing essential to the sustainability and viability of local facilities. Whilst the LPR provides for new housing, the LPR recognizes that Bewdley for example, as a local market town, will provide local services-schools, doctors, dentists, and service business such as hairdressers and used by the surrounding local community. The existing rural community travels to Bewdley and supports a vibrant town. This may be associated with tourism but it also a significant reflection on the income levels of the surrounding rural area. The 40 houses on 2 sites at For Forest (at relatively high densities of nearly 30 houses to the hectare, compared to surroundings), represent a concentration of new development, with the only additional contribution at Bliss Gate, of 5 houses, (at a lower density of 16 houses to the hectare). These 2 sites are only small scale contribution to a very critical rural housing need. Sustainability, as NPPF indicates, includes widening the choice of high quality homes. Responding to different opportunities in different areas must be provided for by taking local circumstances into account, particularly in relation to the provision of housing in the more expensive but rural parishes in the west of the plan area, such as Rock, by policy, beyond that of 8C which seems concerned only with affordable housing.</p>	
	LPPO406	8	Comment	See summary LPPO400.	The OAHN is commissioned by the Council to identify Housing Needs. We will work

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					with Neighbouring Authorities through the duty to cooperate and follow NPPF guidance with regards to Green Belt.
	LPPO429	8	Comment	<p>I object to Option A and Option B.</p> <p>Green Belt land should be used only as a VERY LAST RESORT.</p> <p>Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collaborate and collectively review overall brown field site availability and plan housing development accordingly – decisions to build on the Green Belt should not be based on local authority boundaries.</p> <p>The 5 year rolling time frame for construction sites should allow for regular reviews of brown field sites and enable changes to be incorporated into any plan,.</p> <p>The plan fails to recognise changes in shopping habits and unrealistically targets retail expansion and comparison shopping.</p> <p>Kidderminster has suffered from the failure to 'tidy up' following the migration of Kidderminster town centre to Weavers Wharf and Crossley Retail Park.</p> <p>Retail premises and the courts building have been empty for 8 /9 years - the regeneration of such sites require</p>	The OAHN is commissioned by the Council to identify Housing Needs. We will work with Neighbouring Authorities through the duty to cooperate and follow NPPF guidance with regards to Green Belt.

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				<p>radical solutions for alternative use that reduce any need to build on the Green Belt.</p> <p>Unnecessary decisions are being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping (indeed, the plan itself demonstrates an inability to predict /understand short term population levels in the District).</p> <p>The plan fails in its stated aim to "to use a robust and up-to-date evidence base to ensure that the local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" . Instead it aims to justify what developers want to deliver rather than meet the needs of Kidderminster residents.</p> <p>Previous attempts to build an Eastern relief road have failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph road following the same route as the existing road from the Worcester Road through Mustow Green to the Birmingham Road - is it really a relief road at all?</p> <p>Whilst constructing a new school in the Spennells area appears attractive this (together with the promise of the 'relief road' shouldn't be the determining factor when opting to build on the Green Belt – other options should</p>	

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				<p>be sought.</p> <p>Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years. This situation equally relates to the areas covered by the LEPs identified in the plan.</p> <p>Whilst economic development in Kidderminster will be welcome - past experience shows this will take time – in the meantime people will continue to travel.</p> <p>Immediate need is for fresh radical thinking that optimises the use of brown field sites throughout the LEP areas for residential use and enables Kidderminster itself to become a modern, contained and attractive town centre that incorporates retail leisure and residential opportunities rather than pursue outdated models from the past - 'mixed use' communicates little other than the elements of 'wishful thinking' so often reported in the local press over numerous years.</p>	
Rentplus	LPPO1111	Affordable Housing	Comment	<p>Enclosed with these consultation responses is an Affordable Housing Statement by Tetlow King Planning setting out the model's compliance with the NPPF definition of affordable housing and how this should be incorporated into local plans to boost supply and meet local needs. We ask that this be read alongside our representation so that the Council's approach to negotiating housing takes into account this innovative model which has the capacity to improve delivery and to</p>	Comments noted.

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				<p>meet high levels of local housing need and aspirations of home ownership.</p> <p>Rentplus is delivering rent to buy housing that meets local peoples' needs and aspirations across England, in partnership with local planning authorities and Registered Providers, allocating housing through the local choice based lettings scheme and targeted lettings plans. Those developments provide homes at an affordable rent for those expecting to purchase in 5, 10, 15 or 20 years, with a 10% gifted deposit to assist purchase.</p> <p>Flexible policies and pragmatic responses to individual applications elsewhere in England have helped people move out of inappropriate housing; 30% of those moving into a recent Rentplus scheme left social and affordable rented properties, releasing those homes for families in greater need. People have also been able to leave the private rented sector, leave parent's homes, and gain independence and security of tenure by accessing property with an affordable rent. The model would deliver clear benefits to many in the District who are unable to afford to buy and cannot currently save towards a future purchase.</p>	
West Midlands HARP Planning Consortium	LPPO1338	Affordable Housing	Comment	Our clients' principal concern is to optimise the provision of affordable housing and to ensure the evolution and preparation of consistent policies that help deliver the wider economic and social outcomes needed throughout the region. As significant developers and investors in local people, HARPs are well placed to	Comments noted.

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				<p>contribute to local plan objectives and act as long term partners in the community.</p> <p>Our comments are intended to be constructive, to ensure the policies are found sound at examination.</p>	
Wyre Forest Green Party	LPP01496	Housing principles	Comment	<ul style="list-style-type: none"> All people should have access to housing appropriate to their needs that is affordable, secure and comfortable. We believe that this can be met by a balanced mix of tenures and providers, varying according to people's circumstances and preferences. The provision of housing should include the construction of new homes, conversion of existing buildings to homes and the refurbishment of empty buildings. Priority should be given to the maintenance and improvement of existing properties where they can be improved in line with the local energy plan and to adequate levels of energy and water efficiency. Large numbers of empty homes are a waste of a valuable resource, and blight neighbourhoods. The Local Authority should aim for no more than 0.5% of homes to be empty for more than six months, and should draw up registers of empty properties. There should be a proactive use of Empty Dwelling Management Orders and work with self-help co-operatives to bring homes into use. 	Comments noted.

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				<ul style="list-style-type: none"> • Local authorities should also address under-occupation through encouraging mutual exchange of homes, helping to match people who want to downsize with those who need more space, and providing more homes suitable for people to downsize into such as smaller social rented homes for elderly people. Successful schemes such as “Seaside and Country Homes” should be extended to people in all housing tenures, and to all local authorities. • We would like to see new homes and refurbishments done to the highest of efficiency standards. These would use low-impact materials, especially reused and recycled materials, to minimise the lifecycle embodied greenhouse gases, energy, water and other resources used in the construction of buildings and over the lifecycle of the materials. In addition, homes must be energy (e.g. Passivhaus Standard) and water efficient, and also incorporating comfort standards which address ergonomics, sound, privacy and light, so that homes are places of retreat. 	

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 9: HEALTH

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Kidderminster Harriers Football Club	LPP0950	Policy 9	Comment	To provide support for indoor recreational opportunities. Add to point 6: Contributing to a high quality, safe and convenient walking and cycling network and providing opportunities for <u>both indoor and outdoor</u> recreation and sport.	Agree with comment. Amend policy wording at point 6 to include both indoor and outdoor sport and recreation.
Worcestershire Wildlife Trust	LPP01056	Policy 9	Comment	The health and wellbeing benefits of access to green space and nature are well known and should be captured by this policy. Recommend additional bullet point be added to the policy making reference to the need for development to include and provide access to biodiverse Green Infrastructure.	Agree that policy should have additional bullet point - <i>ensuring development includes or provides access to biodiverse Green Infrastructure.</i>
Worcestershire County Council, Planning Economy & Performance	LPP01149	Policy 9	Comment	<p>We welcome the inclusion of a policy on health and wellbeing which will, subject to certain amendments, help to meet the health-related challenges facing Wyre Forest district, including high levels of obesity, mental health problems, and an ageing population. Given the particular challenges arising from an ageing population in Wyre Forest and the need to plan for dementia-friendly environments, consideration could be given to including a separate policy on these issues, or having separate parts within Policy 9.</p> <p>The wide breadth of health and wellbeing matters included in the policy is generally welcomed, although this does mean that some parts of the policy duplicate other parts of the WFLP or are not specific enough. Much of the current content is too vague, and feels closer to a list of broad aims and objectives that would be more appropriate as introductory text. The following specific changes are</p>	<ul style="list-style-type: none"> • We welcome the County Council’s support for the inclusion of a health and well being policy. • The policy will be amended to specifically mention the needs of those with dementia. • Part 2 - Following discussions, policy wording has been amended to read ‘Providing energy efficient housing that is affordable and of high quality’ • Part 3 has been removed from the amended policy as this is covered elsewhere in the Local Plan

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 9: HEALTH

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>recommended:</p> <ul style="list-style-type: none"> • We support Part 2 but feel that it would benefit from being made more specific. Building Regulations ensure that new developments meet a certain standard of energy efficiency. In addition if there is a desire to specific a requirement which is over and above the standard approach this needs to be specified. • Part 3 would benefit from further detail to clarify whether it is seeking to improve availability of jobs or sustainable physical access to places of employment through the, for example provision of walking and cycling networks. This section could be expanded to include improvements to employment developments which can contribute towards health and wellbeing of employees. Developments should be designed to create opportunities for physical activity and working environments which support social interaction and relaxation of their employees. These measures could include the provision of open/green spaces, recreational facilities or on-site cycling storage/changing facilities etc. • Part 4 would benefit from expansion as further details as it is unclear as to whether this is referring to domestic matters or business / industrial waste and recycling. This is critical because they have different health and well-being impacts and regulatory regimes. There is some potential for non-domestic matters for overlap with the 	<ul style="list-style-type: none"> • Part 4 has been removed from the amended policy as this is covered elsewhere in the Local Plan <ul style="list-style-type: none"> ○ All new developments will be designed to promote walking for everyday trips with easy safe and convenient pedestrian access to shops, schools, open space and bus routes, ○ Part 6 seems to cover two linked but separate issues, with the second section better matched to Part 10. ○ Part 7 - This policy has now been expanded to read as follows: • Locating food and drink premises, hot food takeaways, bars, restaurants, cafés and other non-food and drink uses

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 9: HEALTH

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>Worcestershire Waste Core Strategy which will need to be taken into account in refining and targeting this part of the policy.</p> <ul style="list-style-type: none"> • Improvement to accessibility relating to sections 5, 6, 8 and 9 of this policy. • Accessibility is a major consideration in relation to health and wellbeing in the context of built environment. The provision of community uses, health services and facilities, green spaces or allotments can work for all the population groups only when they are accessible in terms of distance, ability and quality of their travel. This is why the creation of walkable environments to improve resident's access to these areas by foot is important. Further to these enhancing opportunities for the use of public transport should be encouraged through the Local Plan. • Part 6 seems to cover two linked but separate issues, with the second section better matched to Part 10. • We welcome Part 7 but suggest greater specificity over how and where these uses should be limited. Examples include: <ul style="list-style-type: none"> ○ - The target limit of the overall proportion of units of particular uses in a given location; ○ - Limit of particular types of premises in proximity to schools and community centres; ○ - Limit of particular uses in proximity to areas of identified health deprivation and areas where obesity levels are higher than average; ○ - Limiting those premises for which negative 	<p>which may potentially have negative health impacts at least 400m from a youth or community facility. This will be prioritised in areas with high levels of health deprivation.</p> <ul style="list-style-type: none"> • Part 9 - Agree that community orchards could also be added. • Part 11 - Social interaction has been added into the previous part 5 (now part 4) • Air pollution is covered elsewhere at chapter 16 • A Health and wellbeing SPD will be produced following the adoption of the Local Plan. This will cover many of these details affecting people living with dementia and how the environment can be altered to aid them. • The requirement for HIAs is now included in the amended policy at part 3. This will apply to residential developments of 25 or more dwellings and non-residential developments of

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 9: HEALTH

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>health impacts were identified in Health Impact Assessments.</p> <p>Worcestershire County Council can provide good practice examples and would welcome further discussion on this issue as the policy develops.</p> <ul style="list-style-type: none"> • Part 8 may need more detail. Community orchards could also be included here. • Most of Part 9 is already covered in Parts 5 and 6. The only element of Part 9 that is not covered elsewhere is social interaction. This is a valuable inclusion, and could be added to one of the other parts of the policy if 9 were to be deleted. • Part 11 considers air quality, but we would welcome further attention being given to the links between air quality and health. In particular, reference should be made to the document 'Air pollution: outdoor air quality and health - June 2017' published by the National Institute for Health and Care Excellence. This document covers: <ul style="list-style-type: none"> ○ siting and designing new buildings, facilities and estates to reduce the need for motorised travel; ○ minimising the exposure of vulnerable groups to air pollution by not siting buildings (such as schools, nurseries and care homes) in areas where pollution levels will be high; ○ siting living accommodation away from roadsides; 	<p>0.25Ha and over.</p> <ul style="list-style-type: none"> • A Health SPD will be produced following the adoption of the Local Plan.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<ul style="list-style-type: none"> ○ - avoiding the creation of street and building configurations (such as deep street canyons) that encourage pollution to build up where people spend time; ○ including landscape features such as trees and vegetation in open spaces or as 'green' walls or roofs where this does not restrict ventilation; ○ including information in the plan about how structures such as buildings and other physical barriers will affect the distribution of air pollutants; ○ consider action to reduce and limit vehicle idling around schools and other vulnerable populations. <p>There are a variety of issues that may be too detailed for inclusion in the policy itself, but which should nevertheless be considered when planning for development. Many of these apply to the principles of planning and designing dementia-friendly environments, as many more people will live with dementia as the population of Wyre Forest ages, and we should act now to plan for these challenges. We recommend that these issues are taken into account as the WFLP develops, and it may also be helpful to outline some or all of those considered most relevant in the reasoned justification and/or in an accompanying SPD (discussed further below):</p> <ul style="list-style-type: none"> ● The provision of accessible open spaces and walkable 	

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				<p>neighbourhoods can encourage and facilitate increased physical activity amongst the elderly and support their social interaction. It is crucial that these spaces and routes are safe and well-maintained.</p> <ul style="list-style-type: none"> • Public footpaths should also be well-lit and evenly surfaced. • Where there are changes in ground levels, the transition should be gradual. Where steps are unavoidable, the provision of railings is necessary. • Accessible public transport links, such as bus stops within walking distance from people's homes, are also crucial in maintaining the independence of the elderly. • People living with dementia frequently stay at home because they do not feel safe to leave their house because the outdoor environment feels unsafe and unfamiliar. The provision of safe, well-lit, segregated and walkable routes connecting local green spaces and essential amenities could improve the likelihood of those with dementia continuing their everyday lives as part of the community. For example, being able to easily reach the park could offer the opportunity to spend quiet and relaxing time among other people. • It is important that pathways contain seating areas in strategic places, such as at crossroads. People living with dementia might take a little bit longer to remember their destination or how to get there. Circular routes provide opportunities to return to the same point if lost or confused. The design of street 	

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>furniture should be kept simple and familiar to avoid it being mistaken for some other object. The positioning of street furniture, such as placing benches under street trees to allow shading during hot weather, is also important.</p> <ul style="list-style-type: none"> • Paving and tarmac should be plain and non-reflective and should contrast with walls in colour and texture. Dementia affects people's perception of their surroundings and different surfaces. Dark areas might appear to them as a hole in the ground, whilst glaring/shining surfaces can look like water or slippery surfaces. • People living with dementia might feel confused when a lot of information is projected at them at the same time. They generally function better amongst objects in the environment that are simple and familiar. This is why sites should be well signed using a tonal contrast of colours with a clear and simple font. <p>Health Impact Assessment (HIA)</p> <p>We would like to reiterate the value that HIAs can play in planning for healthy developments/environments. HIA ensures that the effects of development on both health and health inequalities are considered and addressed during the planning process. The importance of planning for health and the use of HIAs in planning is promoted through national planning policy and guidance. The National Planning Policy Framework recognises the need to understand and "take</p>	

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>account of the health status and needs of the local population including expected future changes, and any information about relevant barriers to improving health and well-being."</p> <p>Additionally, the national Planning Practice Guidance (PPG) recognises that, in relation to planning applications, HIA is a useful tool to identify where significant impacts on the health of local people are expected. A requirement for, or strong recommendation for HIAs in the Local Plan could help to foster its use and lead to healthier developments. Worcestershire County Council can provide good practice examples and would welcome further discussion on HIA as the WFLP progresses.</p> <p>Health Supplementary Planning Document</p> <p>We recommend that a Supplementary Planning Document is produced to support Policy 9 to provide detailed guidance on how developments can address the health and wellbeing challenges facing Wyre Forest district. Worcestershire County Council has a successful track record of working collaboratively with district councils on producing SPDs, including the 'Planning for Health in South Worcestershire' SPD, which provides guidance on interpreting the health-related policies of the SWDP. This SPD will be adopted late September 2017 and a draft can be accessed at http://www.swdevelopmentplan.org/?page_id=12262.</p> <p>Worcestershire County Council would like to discuss with</p>	

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				WFDC the opportunity to develop a similar document.	
Sport England	LPPO212	Policy 9 - Health and Wellbeing	Comment	<p>General support for this policy and its breadth.</p> <p>Sport England would advocate embedding 'Active Design' within the policy (see link below) and within the list under 9.9 I would suggest you add: built sports facilities such as swimming pools and sports halls and also encourage access to schools by the community to maximise the value of existing sports provision to the local community,</p> <p>https://www.sportengland.org/facilities-planning/active-design/</p> <p>Cross ref. to any built sports facility strategy and the Playing Pitch Strategy would also be recommended to help inform local infrastructure protection/provision and enhancement.</p>	<p>Agree that reference should be made to Sport England Active Design document.</p> <p>Add an additional bullet point to Policy 9 as follows:</p> <p style="padding-left: 40px;">13. Encouraging sport and physical activity through the design and layout of development by embedding Sport England's Principles of Active Design</p> <p>At Para. 9.9 B add following wording to refer to built facilities:</p> <p>... including built sports facilities such as swimming pools and sports halls and also encourage access to schools by the community to maximise the value of existing sports provision to the local community.</p> <p>After final sentence add cross references to adopted Wyre Forest Playing Pitch Strategy and Action</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					Plan and the Indoor and Built Facilities Strategy
Wyre Forest District Council - Development Control	LPP01208	Policy 9	Comment	Should this policy cover GP/Health facilities? We could do with a hook somewhere for this linked to Planning Obs SPD, as NHS Redditch & Bromsgrove are getting savvy about requesting S106 contributions.	The provision of health facilities and GP surgeries is covered by chapter 20 Community Facilities.
Wyre Forest Friends of the Earth	LPP01314	Policy 9 - Point 2	Comment	“Providing energy efficient housing to help reduce fuel poverty”. This policy applies only to new housing stock but there is a need to improve the energy efficiency of older stock particularly privately owned dwellings.	Agree that older privately owned housing stock often requires energy efficiency measures. Unfortunately, this is beyond the remit of the Local Plan.
Wyre Forest Friends of the Earth	LPP01319	Policy 9 - Point 11	Comment	“----- and reducing car dependency” This is a repeated theme throughout the document but there is little indication of how this will be achieved other than references to “sustainable transport”	By designing well-connected attractive safe streets, footpaths and cycle networks which people will want to use, physical activity and mental health will improve and car dependency should be reduced for local journeys. At para.9.3 add above sentence after opening sentence.
Worcestershire County Council, Planning Economy & Performance	LPP01362	Policy 9	Comment	Some words should be deleted from the opening sentence, such that it becomes "Development should help maximise opportunities to improve quality of life to make it easier for people in Wyre Forest District to lead healthy, active lifestyles by".	Agree that this does not read well. Amend opening sentence as suggested. "Development should help maximise opportunities to improve

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					quality of life to make it easier for people in Wyre Forest District to lead healthy, active lifestyles by".
Wyre Forest Green Party	LPP01405	Policy 9 - point 11	Comment	“reducing car dependency” is a repeated theme throughout the document but there is little indication of how this will be achieved other than vague references to “sustainable transport”. The build of fringe suburbs will inevitably increase car use, in contrast to provision of homes in town centres, where walking is possible to most services and shops.	Where possible, sites within the town centres giving easy access to shops and services will be redeveloped for housing. Any large sites on the urban fringes will be designed to encourage access to facilities other than by car by either being located within reasonable walking distance of existing shops and services or new facilities will be provided on the development itself. Developments can be designed to discourage car travel and encourage walking and cycling by providing direct routes to key facilities
Wyre Forest Community Housing	LPP01676	Policy 9	Comment	<p>The Worcestershire Housing Partnership Plan outlines the significant analysis of the links between health and wellbeing and the quality and affordability of different tenure housing. On page 11 of the Plan, it notes that social / affordable rented homes are the ‘healthiest homes’.</p> <p>In view of this, we would recommend that Policy 9 of the Local Plan Review Document reflects this established research and signposts the role that Registered Provider’s play in improving health and wellbeing outcomes.</p>	<p>Comments are noted. Amend Policy 9 bullet point 1 to read as ‘providing healthy homes that meet the needs of future occupiers, including older people and those with disabilities which are both affordable and of a high quality’</p> <p>Add additional sentences at end of para.9.2 ‘Housing has a significant impact on health and well-being.</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					Social and affordable rent homes have consistently been shown to be the healthiest with private rented dwellings having the worst issues around damp and poor heating.'
	LPP01773	New Road, Far Forest BR/RO/7	Object	Development would not be beneficial to health.	This comment is in response to a proposed housing site in Far Forest. For response see Policy 35 BR/RO/7
Bewdley Civic Society	LPP0846	Policy 9 Health and Wellbeing	Support	Support for Policy 9.	Support for Health Policy is welcomed
Place Partnership Ltd	LPP01090	Policy 9 Health and Wellbeing	Support	We welcome and support part (5) of this policy, which states that development should be designed to minimise the potential for crime and anti-social behaviour and improve community safety.	Support for point 5 relating to design and community safety is noted and welcomed
Taylor Wimpey West Midlands	LPP01525	Policy 9	Support	Aspirations supported.	Support is noted.
	LPP02632	Policy 9 Health and Wellbeing	Support	We support the following: Policy 9 Health and Wellbeing.	Support is noted
	LPP04853	Policy 9	Support	We support Policy 9.	Support is noted
	LPP03236	Pages 66-68 Health and Well Being	Object	There is much support in the Rock Parish for the development of new homes for young people of the villages of Rock and Far Forest and immediate vicinity, also for retired and elderly and less able parish residents wanting to	Comments are noted. Welcome support for limited development in main villages in Rock parish to cater for local needs of both young and

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>downsize to accommodation more appropriate to their needs thus releasing larger existing properties into the market.</p> <p>There is little local employment within a four-mile radius of Rock/Far Forest. Bewdley 5 miles, Kidderminster 8 Miles, Birmingham 26 miles, public transport links are appalling with one bus every 2 hrs to and from Ludlow.</p> <p>The nearest doctors' surgeries are in Cleobury Mortimer or Bewdley both 4 miles away. The nearest ambulance station is Kidderminster some 8 miles away or 20 mins travel time in an emergency. The nearest Fire Station is Kidderminster some 8 miles away, some 20 minutes travel time in an emergency. The nearest Police station is Stourport, some 6 miles away and 15 minutes travel time in an emergency.</p>	elderly. Appreciate that there are no medical facilities within the Parish but limited development would help to maintain what services do exist.
Worcestershire County Council, Planning Economy & Performance	LPPO1363	Paragraph 9.2	Comment	In "peoples", the apostrophe should be before the "s", as "people" is already plural.	Noted. Punctuation will be amended.
	LPPO3843	Paragraph 9.2	Object	I object to the Council's strategy for development, there is evidence that the Council remains at odds with the idealised statements made, but is incapable of delivering in practise. The town centre is run down and unattractive with is no 24/7 presence as a result of poor planning. I have little confidence in these proposals.	Officers accept that there have been mistakes made in the past. However, we do not agree that the run-down appearance of parts of Kidderminster town centre can be laid wholly at the door of town planning. The economic down turn has badly affected many towns. Conversion of many upper floors

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					and former office buildings is gradually transforming parts of the town centre and providing a 24/7 presence. More restaurants and cafes mean the town centre has a more family-friendly evening economy. This Local Plan Review aims to put health and well-being back into the core of planning where it originally sat and deliver development that will give people a better quality of life.
	LPP04477	Section 9	Object	For 9.2 How can a very small bit of grass in a large housing development create a feeling of health when compared to Green Belt open space? The whole of Kidderminster and Spennells benefit from the field and Green Belt. You are taking away dog walking and bike riding facilities and will be facilitating bad health.	Officers appreciate your comments but do not agree. Much of the Green Belt around Kidderminster has no public access as there are no footpaths or bridleways. Any development will be carefully designed around significant areas of green infrastructure to provide enhanced access for walking and cycling for both existing and new residents.
	LPP03687	9.3	Object	Where is your evidence for 9.3?	There have been many studies done looking at how the design of new developments has had a positive impact on the health and well-being of residents and visitors.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Worcestershire County Council, Planning Economy & Performance	LPP01153	Paragraph 9.5, Table 9.0.1	Comment	The first indicator in Table 9.0.1 is on GCSE achievement which is something that most people would not directly connect with health and well being. A reordering of the table would be helpful to deliver the message.	Agree with comment. Not sure how relevant educational attainment is to health. Educational attainment is highlighted as an issue affecting the district in the Local Plan Review. Further data can be found in the Sustainability Appraisal. Reorder table with this data at the bottom.
Worcestershire County Council, Planning Economy & Performance	LPP01364	Paragraph 9.6	Comment	The fractions here should be written out in words.	Agree – amend wording to two-thirds and one-third respectively.
Worcestershire County Council, Planning Economy & Performance	LPP01365	Paragraph 9.8	Comment	In the second sentence, the comma after "locally" should be deleted.	Amend sentence to read 'One local example is...'
Worcestershire County Council, Planning Economy & Performance	LPP01154	Paragraph 9.9, part E	Comment	<p>The statement in Part E that "car parking provision should be minimised" should be amended to "car parking standards should be appropriate, and meet WCC car parking standards contained within the highways design guide available at: http://www.worcestershire.gov.uk/download/downloads/id/1847/highways_design_guide.pdf"</p> <p>These standards are currently being updated and will be adopted from October 2017.</p>	Amend text to read 'Car parking provision should be appropriate'. Put link in a footnote.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Wyre Forest Friends of the Earth	LPP01315	Paragraph 9.9	Comment	Many of the six key areas which affect health will be dependent on agreement with developers to provide these facilities. This is particularly important with large developments such as the proposed Spennells extension. The provision of public open spaces, a network of good quality cycling and walking routes, and easily accessed health facilities are important both for public health and the development of a community.	Comments are noted. Masterplanning for key developments are all based around green infrastructure.
Wyre Forest Green Party	LPP01479	Para 9.9	Comment	Many of the six key areas which affect health will be dependent on agreement with developers to provide these facilities. This is particularly important with large developments such as the proposed Spennells extension. The provision of public open spaces, a network of good quality cycling and walking routes, and easily accessed health facilities are important both for public health and the development of a community.	Comments are noted. Masterplanning for key developments are all based around green infrastructure.
	LPP03845	Paragraph 9.9B	Object	I object to the Council's strategy which is at odds with this statement with its proposal to build on Green Belt.	Officers appreciate your comments but do not agree. Any development on Green Belt land will be carefully designed around significant areas of green infrastructure to provide enhanced access for walking and cycling for both existing and new residents.
	LPP0612	All	Comment	These figures are all average or poor. You should strive for the best.	Officers agree that the figures for Wyre Forest are very poor but planning is only one of many influences on lifestyle. Future

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					developments should be designed to encourage a more active lifestyle from an early age.
Summerfield Against Land Transformation	LPP01617	Health	Comment	We acknowledge the health issues identified in the draft Plan and would welcome greater joint working with appropriate health bodies to address these challenges. The desire to stimulate a 'night economy' focusing upon eating and drinking is somewhat at odds with these concerns.	Further meetings have been arranged with health advisors to discuss the challenges highlighted. Comments re the 'night economy' are noted. . Development of more active leisure is planned for Kidderminster town centre
Wyre Forest Green Party	LPP01478	Health and Wellbeing	Comment	<p>There are already well-used and designated Public Footpaths and Rights of Way across the fields that the Local Plan recognises as being intensively used by local residents of all ages – with the positive effects this produces upon their Health and Wellbeing.</p> <p>Natural open spaces have positive effects on people's physical and mental wellbeing. Access to the countryside has been proved to promote physical activity, positive mental wellbeing and healthy childhood development. Children with access to safe green spaces are more likely to be physically active and less likely to be overweight.</p> <p>The Wyre Forest Public Health Profile 2016 lists improving mental health and wellbeing, along with increasing physical activity in the area, as its main priorities.</p>	<p>Comments on benefits of access to open countryside are noted. Through releasing land for development, new access routes will be opened up where there is currently little if any public access. Existing public rights of way will be retained and green corridors expanded. Officers are well aware of the health benefits of open spaces and detailed masterplans and site specific criteria will be drawn up as part of the next stage of the Local Plan consultation process.</p> <p>Discussions are being held with health officials regarding how</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>The Sustainability Appraisal (May 2017) recognises the “positive effect of links via pathways and cycleways” and intends to provide wide cycle paths in any new development. However, a cycling route through a housing estate could not claim to meet the needs of all the current users of the PROWs and Bridle paths. Footpaths that allow walking in the open countryside cannot be equated with ‘Green Corridors’ between housing developments. We feel that the LPR does not sufficiently acknowledge the role of the threatened fields in the provision of access to safe countryside for existing residents of Wyre Forest and certainly has not made any suggestions for protecting or safeguarding this access.</p> <p>Kidderminster has higher obesity levels than the national average (Wyre Forest Public Health Profile 2016), a position which would be exacerbated by reducing access to local fields. The new Wyre Forest Leisure Centre has been moved out of the town centre, reducing access to Kidderminster residents, especially people without their own transport.</p> <p>Other threats to the health and wellbeing of residents arising from development of Green Belt adjacent to existing homes include:</p> <ol style="list-style-type: none"> 1. The proposed new road (Eastern Relief road) causing increased traffic noise, air pollution, light pollution and additional traffic vibration to Spennells’ residents. 2. Increased demand on infrastructure including medical facilities and schools. 	<p>obesity problems can be tackled through the planning process.</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>3. Social problems arising from increasing the size of the estate; evidence exists that large housing estates suffer more crime and anti-social behaviour (as acknowledged in the WFIDP May 2017).</p>	
Ramblers Association	LPPO4128	Policy 9 Health and Wellbeing	Comment	<p>We are pleased to see that you have identified the link between walking and cycling and health and wellbeing. However, we would have liked to see a clear reference to the intention of the District Council to use its planning powers to protect public rights of way and the enhancement of the network as a means to achieve its objectives relating to health and wellbeing. Point 5 of the Policy which deals with open space refers to the need to ensure that they are designed to be safe. The same need is also valid for public rights of way and cycleways if they are to be used by a wide range of people.</p> <p>The Reasoned Justification makes no reference to walking and cycling except in relation to places of work. We think that this should be expanded to include the journey to school, to retail centres, leisure facilities etc.</p>	<p>Agree with comments. Expand point 5 of Policy 9 to read as ‘... safe and attractive public areas, green spaces, footpaths, bridleways and cycle routes which minimise the potential for crime ...’</p> <p>At para.9.9 A Movement and Access:- add additional phrase ‘... walking and cycling networks service schools, shops, workplaces and leisure facilities;’</p>
	LPPO4145	Section 9	Comment	<p>The Local plan is contradictory, saying how important it is for the community to have green space for both physical and mental wellbeing but taking this away from the people at the eastern side of Kidderminster.</p> <p>Health inequalities Wyre Forest -District Life expectancy is 10.8 years lower for</p>	<p>Comments are noted. Do not agree that those on the eastern side of Kidderminster will have their green space taken away by the Local Plan proposals. The proposals will include increased access to natural open space with a network of footpaths/cycleways linking key</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>men and 6.5 years lower for women in the most deprived areas of Wyre Forest than in the least deprived areas.</p> <p>Child health - Wyre Forest and Wychavon have significantly higher percentages of children with excess weight for Reception year than the Worcestershire average in the 3 years pooled data. 2012/13 – 2014/15 In Year 6, 21.7% (177) of children are classified as obese.</p> <p>Adult health - Estimated levels of adult excess weight are worse than the England average.</p> <p>Local priorities - Priorities in Wyre Forest include improving mental health and wellbeing, reducing harm from alcohol, and increasing physical activity. Reducing Green Belt is totally contradictory to these local priorities</p> <p>The Green Belt is an important aid in reducing urban pollution, any reduction in its land mass will impact ultimately on peoples' health.</p> <p>The Council proposing to reduce 2.4% of Green Belt around the east of Kidderminster in Option A. This is not only to build approximately 1700 houses, it is to build a new road – Eastern Relief Road, which it says will:</p> <ol style="list-style-type: none"> a. Enable S-NE traffic to by-pass Kidderminster altogether en route to M5 motorway and Birmingham b. Help relieve congestion on A449 and in Kidderminster the river crossing (Ring 	<p>facilities. Much of the land to the east of the town has little formal public access at the moment.</p> <p>Table 9.0.1 will be updated once the Wyre Forest Health Profile for 2018 is published in July.</p> <p>Proposals for a relief road linking the A449 A448 and A456 are no longer proposed in the Local Plan Review.</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>Road, Horsefair etc)</p> <p>When questioned at a drop-in session the planner said that this will be a single carriageway, crossing the railway opposite the vehicle testing centre on Worcester Road and crossing the field adjacent parallel to Stanklyn Lane. It will take lorries and high-sided vehicles unable to go under the 'black bridge'. She said that she saw that houses might be clustered along it rather than 'filling the field'.</p> <p>A new road carrying traffic through previous green fields and new houses totally contradicts the recent Government paper: UK plan for tackling roadside nitrogen dioxide concentrations - An overview July 2017 - The government's ambition for a better environment and cleaner air</p> <ol style="list-style-type: none"> 1. We pledge to be the first generation to leave the environment in a better state than we inherited it. 2. Clean air is one of the most basic requirements of a healthy environment for us all to live, work, and bring up families. Whilst air quality has improved significantly in recent decades, and will continue to improve thanks to the action we have already taken, there are some parts of our country where there are unacceptable levels of air pollution. This can come from a range of different sources and activities. Many everyday activities such as industrial processes, farming, transport, generating energy and heating homes can have a detrimental effect on air quality. This is a problem we need to tackle. 	
	LPPO4727	Section 9	Comment	As far as I can see in this section there is no reference to how access to health professionals and hospital provision will	This section looks at how planning can impact on people's health and

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>reflect the increased population brought about by all this additional housing. How and where will the extra Doctors and Doctor's surgeries be generated within this plan and what will happen to local Hospitals which cannot cope with the health of the present residents of the area?</p> <p>I am sure that the Council response that this is not their problem to resolve. However, I think that we are all aware of the strain that immigration has already put on health and education across the country and the resentment this has caused. What will happen when it takes residents even longer to see Doctors or have treatment in hospital? It will negate all the wonderful words in this section about health (9.2) and the requirement to improve health, social interaction and reduce health inequalities.</p>	<p>encourage a healthy lifestyle.</p> <p>Health services provision is covered by the Community facilities chapter. As part of the strategic allocations in this Local Plan sites for additional GP surgeries will be allocated. New 2-form entry primary schools are also proposed as part of these sites.</p>
	LPP04863	Section 9	Comment	<p>There are numerous comments in the review relating to the high percentage of overweight and obese people in the area, including children however there is no mention at all about medical services. It is proposed that some 6000 homes are to be built in Wyre Forest which would equate to an increase in population of circa 20,000 for which access to local doctors and dentists will be required. Currently it is virtually impossible to find a NHS dentist in Kidderminster. On top of this there is the need for hospital services to serve residents in Worcestershire as a whole. It is assumed that other district councils are also looking at housing plans then there is the possibility that the population of Worcestershire could increase by more than 80,000. Serving the area are three main hospitals in Worcester, Kidderminster and Redditch.</p>	<p>Comments are noted. As part of the proposals, 2 additional doctors' surgeries are planned for the urban extensions in Kidderminster together with replacement facilities in Stourport-on-Severn.</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>Kidderminster hospital was some years ago downgraded and some services from Redditch have been moved to Worcester. It has been reported for some time that the service provided by Worcester Hospital is of an inadequate standard with a status of "special measures" being applied. However more recently this hospital was defined as the worst performing hospital in England. Therefore how is it possible to cope with an aging population and a potential significant increase in population and why has there been no reference to this issue in the review.</p>	
	LPPO3684	Section 9	Object	<p>Use of open space and greenfield is beneficial to health. This section is at odds with what the plan is proposing. Health will be affected by increased congestion, lack of open space, overcrowding, increase in anti-social behaviour.</p> <p>Table 9.01, 9.6 and 9.9 are all evidence for keeping the Green Belt and the fields not concreting over it. You state in the report that <i>Open spaces, play and recreation - planned network of both blue and green infrastructure; easily accessible natural green space of varying sizes; safe and easily accessible play areas which are overlooked; sports and leisure facilities designed for use by all</i></p> <p>This statement is at odds with the actions you are proposing. The greenfields serve this facility.</p>	<p>Officers do not agree that proposals will lead to a lack of accessible open space. Any new developments on Greenfield sites will be designed around an enhanced green infrastructure with natural open space served by walking and cycling routes. Any land released from the Green Belt will have to demonstrate enhanced public access. Many of these areas do not currently have any public rights of way crossing them. These new developments will be designed to encourage both new and existing residents to use the open space with a network of circular walking routes created across the sites with links to key facilities.</p>

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	LPP01710	New Road, Far Forest BR/RO/7	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> • Already had an increase of large vehicles using the roads. • Concerns about safety of other routes onto the main road. • School is full to capacity. • Public services are inadequate. 	This site in New Road Far Forest is no longer being considered for allocation for housing development owing to a number of different factors including biodiversity and highways issues.
	LPP01724	New Road, Far Forest BR/RO/7	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> • Impact on health 	This site in New Road Far Forest is no longer being considered for allocation for housing development owing to a number of different factors including biodiversity and highways issues.
	LPP01729	New Road, Far Forest BR/RO/7	Object	<p>Objects for the following reasons:</p> <ul style="list-style-type: none"> • No employment locally - will lead to people travelling to work by car which is bad for the environment. • No doctors in the village - closest ones already near capacity. 	This site in New Road Far Forest is no longer being considered for allocation for housing development owing to a number of different factors including biodiversity and highways issues.

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Horton Estates Ltd	LPPO863	Policy 10A	Comment	Policy seeks to safeguard/reserve existing employment land for employment-generating uses. No objection but the current wording is not flexible enough to allow alternative uses where there is no reasonable prospect of employment reuse. This is a specific requirement of para. 22 of the NPPF, which states that planning policies should avoid the long-term protection of sites allocated for employment use "where there is no reasonable prospect of reuse." Request more flexible wording to provide clear criteria for assessing whether employment land is appropriate for release for alternative use(s).	The wording of the policy has been given due consideration. It is considered that the wording conforms with NPPF 2018 and has flexibility.
Taylor Wimpey West Midlands	LPPO1527	Policy 10A	Comment	<p>Analysis of employment land requirement seems logical and is a fair reflection of what future land demand could look like in Wyre Forest if past trends continue.</p> <p>Concern with the 40ha employment land requirement is that it does not appear to take into account if Wyre Forest sees stronger economic growth under a "policy-on" scenario. Wyre Forest District could need around 60ha of employment land. By figure of 40ha, a risk that the economy of Wyre Forest remains stagnant and falls behind other parts of the region. Worcestershire LEP's Strategic Economic Plan has a vision to grow the LEP economy by 25,000 jobs by 2025. It is unlikely that Wyre Forest will make much of a contribution</p>	As you correctly state Wyre Forest District Council commissioned an Employment Land Review (ELR) in 2016 to assess economic development needs across the District. The findings were that up to 40 hectares of employment land was required within the District. In 2018 an update to the ELR was commissioned to ensure that the requirement for employment land is up to date.

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				to this target if its economy only grows under baseline conditions. Consideration should therefore be given to increasing the quantum of employment land brought forward by the Local Plan.	
	LPPQ4753	Policy 10A	Comment	<p>Objective: To determine the need for industrial/commercial units and where to be sited (40 hectares of employment space allegedly required by 2034): A reassessment of the questionable need for local industrial/commercial development should be undertaken. The three Wyre Forest towns are primarily a dormitory for the industrial and commercial conurbations of Birmingham and the Black Country and, to a lesser extent, Wolverhampton and Worcester. Local unemployment is not a massive issue.</p> <p>The Council should take into account its previous experience of planning failure ... industrial and commercial units (including new builds) having remained unoccupied for indefinite periods of time.</p> <p>Take account of ‘Britons’ and ‘Victoria Carpets’, which will make manufacturing space available in due course.</p> <p>The projection of 40 hectares may well be an over-estimate?</p>	The Local Authority has evolved their strategy for development based on evidence. This includes the Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal.

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				<p>Objective: To promote economic development: Wyre Forest has not been an industrial area since the demise of the carpet industry, since which time, it's been a desirable District in which to live and raise families. Many residents have their homes here to take advantage of its green and pleasant surroundings, avoiding the industrial sprawl of just a few miles away. It's doubtful that a poll of public opinion would support any dramatic rebranding to encourage more industrial/commercial development than is essential to provide for a moderate growth of population.</p> <p>It's important to recognise the massive government expenditure expected to develop the "Midlands Engine" and the probable availability of extensive employment opportunities within commuter range.</p>	
	LPPO5109	Economic growth	Comment	If Planning is assuming that this projected increase in population will be the consequence of sustainable economic growth within the area, then there are no specific references in the report relating to which and what type of industries and businesses could be attracted to replace the declining carpet and ancillary industries.	The Local Authority wish to encourage a range of new business to the District and also to encourage the growth of existing businesses. The Local Authority commissioned an Employment Land Review (ELR) in 2016, updated in 2018 to assess how much employment land is required within the District.
	LPPO3849	Policy 10A	Object	I object to the Council's strategy for development. It is completely unjustified to release a further	There are nine units at Easter Park, eight of

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				40Hectares of employment land when there is existing land which lies vacant. There are unused units on Easter Park that have laid empty since their construction. Any new units will also lay empty.	these are occupied. The Local Authority has evolved their strategy for development based on evidence. This includes an Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal.
	LPP01832	Town Centre development	Comment	The hope of increasing prosperity in the Weavers Wharf and thus regenerate the old town centre is pie in the sky. Internet shopping will only to continue to increase and put pressures on retail shopping which will contract as a result.	Agree that retail patterns have changed due to changing shopping habits including the rise of internet shopping. Policy 10B and Policy 22A consider alternative uses in the town centres. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation, employment and residential.
	LPP03796	Policy 10B	Comment	The future of Kidderminster must start with rejuvenation of the town centre spreading outwards. The large units will never attract new business. The current financial climate would make the risk of undertaking a retail unit of that size too great. Breaking the buildings up into low rise apartments with small artisan retail units interspersed would be the best option. Include pockets of green space and trees, with seating. The	Retail has changed with the rise of internet shopping and as you state many retailers do not want large premises. Agree that the canal and tourism should be promoted to reach its potential and this is covered in other policies. Policy 22A states that in secondary shopping areas support will be given for

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				<p>local schools and college should be encouraged to run small businesses as part of educational programmes. Design students encouraged to group together and run a cooperative — showcasing their individual talents. The canal side and tourism exploited for its maximum potential. The access routes into the town centre need to be made safer and more attractive. On the protest march I noted the extent of the vandalism and stench in the underpass — I certainly wouldn't walk there alone or encourage my daughters or any tourist to.</p>	<p>change of use of retail units to alternative uses such as leisure, recreation and residential.</p>
	<p>LPPQ4754</p>	<p>Policy 10B</p>	<p>Comment</p>	<p><u>Objective: The sensitive development and redevelopment of Kidderminster town centre</u></p> <p>Kidderminster has lost its 'retail appeal' in recent years, due mainly to its empty shops, parking charges, competition from the Merry Hill Shopping Centre and, in the 21st century, from the internet. This is unlikely to change but, with foresight, the situation presents an opportunity to create a more vibrant town centre, replacing redundant shops and offices with high density, affordable living accommodation, with a socially friendly infrastructure of pedestrian areas, clubs, bars, and restaurants, gardens, street furniture etc.</p>	<p>Agree that retail patterns have changed with the change in shopping habits including the rise of internet shopping.</p> <p>Policy 10B and Policy 22A consider alternative uses in the town centres.</p> <p>Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation, employment and residential.</p>
	<p>LPPQ4879</p>	<p>Policy 10B</p>	<p>Comment</p>	<p>Kidderminster lacks coherent planning. Many large premises are empty - the eyesore which is Crown House, and derelict Worcester street etc. With</p>	<p>Agree that retail patterns have changed with the change in shopping habits including the rise of internet shopping.</p>

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				<p>imagination and planning much could be revitalised and used productively. Retail business will never be as it was 30 years ago. Scant recognition of these observations is made in the plan. Retail businesses should be downsized to reflect future demand, and the historical heritage buildings should be sympathetically developed, and there should be living accommodation built centrally based. If flats/small affordable housing were to be built on central town sites it would attract young professionals and entrepreneurs. The town centre would become vibrant again, with more leisure, restaurants, and tourist attractions centrally based. Our town has so much that is positive, with many aspects that make it still an attractive town to live in - the Safari Park, the SVR, the Carpet Museum, The Rose Theatre and the Bewdley Festival are examples. In addition there are thriving vibrant group activities ongoing, many choirs, choral societies, art groups, the Civic Society, a very active U3A, canals, rivers, golf courses, gyms, and new leisure centre to name but a few. This is a sound base for future development. Kidderminster could, with imagination and creative planning become a lovely town again where a diverse population would want to come to live, and visit as welcome tourists.</p>	<p>Crown House will be demolished and the area redeveloped.</p> <p>Agree that Kidderminster and wider area within the District have many assets, many attractions are listed in the tourism chapter 23.</p> <p>The Local Authority has considered alternative uses to retail in Kidderminster town centre. Policy 22A supports in secondary shopping areas proposals for alternative uses such as leisure, residential, recreation and employment.</p>
Taylor Wimpey West Midlands	LPP01528	Policy 10B	Comment	No comments.	Noted.

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Worcestershire Wildlife Trust	LPPO1057	Policy 10B	Comment	We are pleased to support the third bullet point set out in this policy and in particular the weight it gives to protecting the natural environment in towns from the adverse effects of development.	Support for the third bullet point in Policy 10B is noted.
Worcestershire County Council, Planning Economy & Performance	LPPO1155	Policy 10B	Comment	The second bullet point states that "New development for retail, commercial and leisure uses should follow a sequential approach and be directed to Kidderminster town centre as the strategic centre in the District first followed by Stourport-on-Severn and Bewdley". Would this mean that no new retail development could be considered in Stourport or Bewdley unless Kidderminster is considered first through a sequential test?	Wording of this bullet point has been amended.
	LPPO613	Policy 10B	Comment	People live in town centres, licensed premises should not operate after midnight. This becoming an increasing problem in Bewdley.	Comments and concerns are noted.
Campaign to Protect Rural England	LPPO938	Policy 10B	Comment	We welcome the policy generally, but think it could be better expressed. A separate Retail paper accompanies this. We would suggest that the clustering of many non-residential uses in town centres should be encouraged, and most non-retail uses in residential areas should be discouraged. This is not intended to apply to ground floor protected retail frontages, but such protection should be limited to areas where true retail uses still predominate.	The Local Authority has considered alternative uses to retail in the town centre to enhance vitality in the secondary shopping areas and the following policies will support these alternative uses. Policy 10B and Policy 22A consider alternative uses in the town centres. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units

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					to alternative uses such as leisure, recreation, employment and residential.
Gemini Properties	LPPO1194	Policy 10B	Object	<p>Policy 10B Town Centre Development - sets out sequential approach directing such development to Kidderminster as the strategic centre in the first instance. Appendix A shows extent of Primary Shopping Area but does not identify extent of town centre boundary. The NPPF gives a clear distinction between the Primary Shopping Area and the Town Centre. This matter should be rectified by an amendment to the Primary Shopping Area plans in Appendix A to include a Town Centre boundary. In this regard, it is clear from the definition within the framework that the town centre boundary should extend beyond the primary shopping area and include additional surrounding land uses.</p> <p>Gemini Property's site at Park Lane (part of BHS/16) should be included within the Town Centre boundary. We consider that the existing policy KCA.WG2 - Park Lane Canal side should be retained and carried forward into the Local Plan. Indeed, additional flexibility should be added to the site in order to encourage its redevelopment and deliver a high quality scheme enhances the town centre. The site should, therefore, be incorporated within the Town Centre boundary defined as Appendix A. We provide further comment on the allocation of the</p>	<p>BHS/16 is seen as a site outside the town centre, there are no links across to the centre at the current time. The site is likely to be residential led and not a primary or secondary shopping area. The maps referred to show the primary shopping area and the primary and secondary shopping frontages in the retail area in Kidderminster.</p> <p>The comment relating to bullet point number 5 The proposals for alternative town centre uses will, where appropriate be supported if there is no significant impact on the vitality and viability of the existing centre. It is considered that this does not introduce a hierarchy of town centre uses.</p>

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				<p>site and our response to Policy 30 – Kidderminster Town Allocations.</p> <p>We consider bullet point 5 of policy 10B is not NPPF compliant as it effectively seeks to introduce a hierarchy of town centre uses where residential and recreational uses are considered secondary to other town centre uses. Section 2 of the NPPF does not support this. This test should be removed from the Policy.</p>	
	LPP02633	Policy 10B	Support	<p>We support the following:</p> <p>Policy 10B Town Centre Development.</p>	Support for Policy 10B is noted.
	LPP04854	Policy 10B	Support	Support Policy 10B.	Support for Policy 10B is noted.
Bewdley Civic Society	LPP0847	Policy 10B	Support	Support for Policy 10B.	Support for Policy 10B is noted.
Chaddesley Corbett Parish Council	LPP01039	Policy 10D	Comment	It may be beneficial to specify the types of tourist developments that are (or are not) desired or appropriate	Any proposal for tourist development would be determined on its merits and therefore a list of desired or not types of tourism would not be considered to be appropriate.
West Midland Safari Park	LPP01327	Policy 10D	Comment	<p>Generally supportive of this policy, recognising as the supporting text does the regional significance of West Midlands Safari Park as a tourist attraction.</p> <p>We object to the Policy as presently drafted. The</p>	Wording of the policy has been amended.

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				<p>third bullet point gives the Council an opportunity to request off- site improvements and or contributions towards transport infrastructure. The policy and/or the supporting text should be amended to more closely reflect paragraph 32 of the National Planning Policy Framework so that it is made clear that such provision or such contributions will only be sought where the residual cumulative impact of developments are severe, and where it is practical and viable so to do. The amendments should be as Policy 6C.</p>	
<p>Worcestershire County Council, Planning Economy & Performance</p>	<p>LPP01221</p>	<p>Policy 10D</p>	<p>Comment</p>	<p>WCC support the approach to tourism outlined in policy 10D.</p> <p>However, we feel that there is opportunity through the local plan review process to develop a revised and improved approach to car parking in the tourist towns of Bewdley and Stourport, where traffic congestion and lack of car parking are perceived to be limiting factors for the growth of the tourist industry, deter visitors and contribute to poor air quality in the towns, including within the AQMA.</p> <p>Our proposal is that the car parks are comprehensively reviewed and that new locations are developed to reflect the predominant flows of the traffic and prevent it having to cross the towns, reducing traffic congestion and also providing more</p>	<p>Agree that a comprehensive review of parking in Stourport on Severn and Bewdley would be welcomed.</p>

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				flexible car parking spaces. This is discussed in more detail in the attached document (Car Parking Review Bewdley and Stourport) and we welcome the opportunity to discuss these proposals in more detail with WFDC as the review of the local plan develops.	
Worcestershire County Council, Planning Economy & Performance	LPP01370	Policy 10D	Comment	In the third bullet point, the final word should be "centres" rather than "centre".	The amendment has been made.
Taylor Wimpey West Midlands	LPP01529	Policy 10D	Comment	No comments.	Noted.
Ramblers Association	LPP04137	Sustainable Tourism	Comment	Walking and cycling make significant contributions to the economy of rural areas, supporting local pubs, restaurants, accommodation and visitor attractions. Encouraging walking and cycling are very effective ways to improve the rural economy without making great demands on the environment or requiring excessive investment. Improvements to the condition of the footpath network and in safe cycle routes and making people aware of what is on offer should be priorities for those involved in promoting tourism. An acknowledgement of this in the plan would be useful.	Agree that walking and cycling are very important. This area is also considered in the Health Chapter (9), Transport Chapter (13) and Tourism Chapter (23).
	LPP03689	Policy 10D	Object	There appears to be many optimistic and unsupported statements relating to what will take	It is unknown what proposals for tourism the Local Authority may receive.

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				place to support tourism. Tourism will be severely impacted if the Green Belt is impacted and traffic flows are congested. There does not appear to be any concrete proposals.	The Local Authority can support suitable tourism by adopting policy such as the sustainable tourism policy.
	LPPO3846	Paragraph 10.1	Object	I object to the Council’s strategy for development. Proposed eastern bypass is completely at odds with these statements.	The Local Authority has evolved their strategy for development based on evidence. This includes an Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal.
	LPPO4495	10.2 Retail and Leisure car parking	Comment	Nationally all Supermarket/Leisure Centres etc should have secure safe multi story parking attached with easy access to the main building e.g. new Leisure Centre/Aldi car park. Multi car parks can be attractive and safe if planned correctly, we cannot afford to cover our land with tarmac and planners need to be innovative rather than having to build on priceless Green Belt land.	Comments noted.
	LPPO3848	Paragraph 10.2	Object	I object to the Council’s strategy for development. Proposed eastern bypass is completely at odds with these statements. It is completely unjustified to release a further 40Hectares of employment land when the Council cannot make the best use of existing land including that which lies vacant. There are unused units on	The Local Authority has evolved their strategy for development based on evidence. This includes an Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal.

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				Easter Park that have lain empty since their construction. Any new units will also lay empty.	The ELR review findings were that additional employment land is required within the District. Eight of the nine units on Easter Park are occupied.
Worcestershire County Council, Planning Economy & Performance	LPP01366	Paragraph 10.3	Comment	In the second sentence, "initiative" should be "initiatives".	The word has been amended.
	LPP03861	Paragraph 10.4	Object	Object to the Council's strategy for development. Unjustified to release a further 40Hectares of employment land when the existing land lies vacant. Unused units on Easter Park that have been empty since construction. Any new units will also lay empty.	There are nine units at Easter Park, eight of these are occupied. The Local Authority has evolved their strategy for development based on evidence. This includes an Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal.
Summerfield Against Land Transformation	LPP01614	10.5 Employment	Comment	Low unemployment is welcomed — a low qualification workforce together with low wage and lower skill jobs is a concern. We endorse and encourage the Plan's partnership working initiatives with the Safari Park and the SVR in terms economic growth, employment and the capacity for	Employment land requirement is based on the findings of the 2016 Employment Land Review (ELR) which in 2018 is being updated. The housing numbers are based on the findings of the updated Objectively Assessed Housing Need OAHN 2018.

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				<p>cooperation in the provision of a rail transport infrastructure.</p> <p>We believe strongly that the Council should have an economic development led strategy to stem job losses and encourage SMEs to stimulate the local economy.</p> <p>We would encourage the Council to give a higher priority to stimulating the local economy (push strategy) and a more balanced approach to housing (pull strategy).</p>	
	LPPO3862	Paragraph 10.5	Object	I object to the Council's strategy for development. If the economy is successful there is no justification to enlarge it by unsustainable housing and employment land on the Green Belt.	The Local Authority has evolved their strategy for development based on evidence. This includes an Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal.
	LPPO3688	10.6	Object	There is no evidence to suggest that in migration of residents will be employed in Kidderminster. More likely is that they will commute to Birmingham and beyond.	By allocating additional land for employment uses the Council aim that as many people as possible will live and work within Wyre Forest District.
	LPPO3866	Paragraph 10.6	Object	I object to the Council's strategy for development. Paving over fields will do little to address the perceived 'challenges', instead make them worse. The Council need to make best use of existing infrastructure before trying to enlarge.	The Local Authority has evolved their strategy for development based on evidence. This includes an Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the

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					<p>Sustainability Appraisal.</p> <p>The Local Authority recognises that additional infrastructure will be required.</p>
	LPPO3868	Paragraph 10.7	Object	I object to the Council's strategy for development. Paving over fields will do little to address the perceived 'challenges', instead make them worse. The Council need to make best use of existing infrastructure before trying to enlarge.	<p>The Local Authority has evolved their strategy for development based on evidence. This includes an Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal.</p> <p>The Local Authority recognises that additional infrastructure will be required.</p>
	LPPO3869	Paragraph 10.8	Object	I object to the Council's strategy for development. Paving over fields will do little to address the perceived 'challenges', instead make them worse. The Council need to make best use of existing infrastructure before trying to enlarge.	<p>The Local Authority has evolved their strategy for development based on evidence. This includes an Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal.</p> <p>The Local Authority recognises that additional infrastructure will be required.</p>
	LPPO3870	Paragraph 10.9	Object	I object to the Council's strategy and thinking for development. Paving over the fields will do little to address the perceived 'challenges', but instead	The Local Authority has evolved their strategy for development based on evidence. This includes an Employment

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				make them worse. The Council need to demonstrate that it has made best use of existing infrastructure and that it is contributing to society before trying to enlarge. There is no present confidence in the proposals.	Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal. The Local Authority recognises that additional infrastructure will be required.
	LPP05072	10.10	Comment	The sentiment shown for developing the town centres, (Kidderminster, Bewdley & Stourport) presumes that the Civic Authorities are in a position of ownership, to be able to progress any development proposals or ideas. This is all very plausible but I would suggest that very little, if any, of the town centres are actually owned by the Civic Authorities. So from the very beginning any such ownership rights will prove to be expensive to the civic purse and precious little will be shown for the move to improve the town centres.	The Local Authority does not consider that the Civic Authorities own or would be progressing development. It is considered that developers would be progressing development facilitated by policy.
	LPP05091	10.10	Comment	The Council has made a number of attempts to attract more retailers to Kidderminster over the last few years, with limited success. It is clear that it is becoming more difficult for high street retailers to compete with internet services in all but a few markets, but there is no recognition of this in the Plan. The trend nationwide is for a decline in the number of banks, building societies, estate agents etc. which make up many of the businesses in town centres. Kidderminster town centre has at least 40	Agree that retail trends have changed and that regeneration is needed in Kidderminster. The Local Authority has considered alternative uses to retail in the town centre to enhance vitality. This is found in Policy 10B and Policy 22A which consider alternative uses in the town centres. Policy 22A - In secondary shopping areas, support

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				<p>large shops and office blocks that stand empty, some for well over a decade. The town centre is in urgent need of regeneration; I believe that Compulsory Purchase Orders should be made on some of the larger shops that stand no chance of ever being filled due to their size. Planning needs to accept that the amount of shop frontage in Kidderminster is in excess of need and the area associated with retail and related businesses in Kidderminster town centre be downsized to reflect likely future demand, and areas surplus to retail, such as Worcester Street, converted to apartments with some mixed use.</p>	<p>will be given for change of use of retail units to alternative uses such as leisure, recreation, employment and residential.</p>
	<p>LPP04774</p>	<p>10.10</p>	<p>Comment</p>	<p>Outdoor lifestyle of street restaurants, coffee shops and residential living if embraced into the council's plans would bring Kidderminster into the 21st Century. Other areas appear able to accommodate living and shopping /working environments within their town centres making them vibrant and used.</p> <p>It is nice to see the new riverside walk development thriving, hopefully it will continue, as it is evident that the population enjoy eating outside. The council should be looking to the town centre area initially encouraging companies and people to use the area, even reducing car park prices to encourage footfall or run a good local bus service well into the evening. The council need to work</p>	<p>The Local Authority has considered alternative uses to retail in town centres to enhance vitality and viability.</p> <p>Policy 10B and Policy 22A consider alternative uses in town centres. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation and residential.</p>

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				with property owners to re-designate their empty shops into residential for this purpose of encouraging people to live in town.	
	LPP03871	Paragraph 10.10	Support	I support the paragraphs and statements therein for 10.10.	Support for paragraph 10.10 is noted.
Worcestershire County Council, Planning Economy & Performance	LPP01367	Paragraph 10.17	Comment	In the second sentence, it should be "The District's settlement hierarchy of towns is..." rather than "are".	The sentence has been amended.
	LPP03873	Paragraph 10.11	Object	I object to the Council's strategy and thinking for development. There is no evidence that the proposals have business cases that are economically viable with respect the demand analysis.	The Local Authority has evolved their strategy for development based on evidence. This includes an Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal.
	LPP04728	10.15	Comment	Good to see that there is enough space in the town centres for the area's retail needs but cannot see any direct reference to using the disused factory and office space for housing needs. Is this something that is being considered?	The Local Authority has considered alternative uses to retail in the town centre to enhance vitality and viability. Policy 10B and Policy 22A consider alternative uses in town centres. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation

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					and residential
Worcestershire County Council, Planning Economy & Performance	LPP01368	Paragraph 10.17	Comment	In the second sentence, the apostrophe in "town's" should be deleted.	This has been amended.
Worcestershire County Council, Planning Economy & Performance	LPP01369	Paragraph 10.18	Comment	In the third sentence, the extra comma should be deleted. Also in this sentence, "as well" should be "as well as".	The amendments have been made.
Historic England	LPP01272	Sustainable Tourism	Comment	We would recommend including a paragraph on heritage tourism and recognising the economic benefits of the historic environment. A clause could also usefully be included within Policy 10D.	Some of the wording in Policy 10D and the reasoned justification has been amended.
	LPP04758	10.18	Comment	Objective: The protection of those sites important to tourism: It has to be recognised that the Severn Valley (including Bewdley town centre and some selected parts of Stourport), the Severn Valley Railway and the West Midlands Safari Park are essential to the local economy and require sensitive protection. There are other smaller sites throughout the District but, in a situation where vast additional housing and employment infrastructure requirements appear to have been identified as essential (notwithstanding the importance of tourism), all areas should be subject	The Local Authority considers all of the District when identifying possible sites for development.

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				to scrutiny.	
	LPPO3874	Paragraph 10.18	Object	I object to the Council’s strategy and thinking for development. The Council states that there is a large contribution to the local economy brought by tourism. This will be harmed by over development of the small towns over their natural size bringing down the environment and pleasant setting. Tourists will not want to travel though acres of urbanised jungle to access sole-less town centre. Tourism will be damaged along with the economy by paving over the existing Green Belt.	The Local Authority seeks to protect and enhance tourism within the District however additional development is required based on evidence which includes an Employment Land Review (ELR) 2016, updated 2018 and Objectively Assessed Housing Need (OAHN) studies 2016, updated 2018.
	LPPO615	10.18	Support	Support for paragraph 10.18.	Support for 10.18 is noted.
	LPPO3875	Paragraph 10.19	Object	I object to the Council’s strategy and thinking for development. The Council states that there is a large contribution to the local economy brought by tourism. This will be harmed by over development of the small towns over their natural size bringing down the environment and pleasant setting. Tourists will not want to travel though acres of urbanised jungle to access sole-less town centre. Tourism will be damaged along with the economy by paving over the existing Green Belt.	The Local Authority seeks to protect and enhance tourism within the District however additional development is required based on evidence which includes an Employment Land Review (ELR) 2016, updated 2018 and Objectively Assessed Housing Need (OAHN) studies 2016, updated 2018.
	LPPO598	10.20	Comment	Given the importance of tourism to the local economy, any developments that would reduce the greenfield footpaths or destroy countryside views	The Local Authority agrees that tourism is important to the local economy and seek to protect and enhance tourism within the District. A balance needs to be made as additional development is required based

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				<p>should be resisted.</p> <p>The green setting of Bewdley west and north of the river giving a gradual transition from town to field to forest should be preserved as these views are valued by passengers on the SVR and tourists taking circular walks from the town.</p>	<p>on evidence including an Employment Land Review (ELR) 2016, updated 2018 and Objectively Assessed Housing Need (OAHN) studies in 2016 and updated in 2018. The Local Authority will try to ensure that development has minimal impact on tourism.</p>
	LPPO3876	Paragraph 10.20	Object	<p>I object to the Council's strategy and thinking for development. The Council states that there is a large contribution to the local economy brought by tourism. This will be harmed by over development of the small towns over their natural size bringing down the environment and pleasant setting. Tourists will not want to travel through acres of urbanised jungle to access sole-less town centre. Tourism will be damaged along with the economy by paving over the existing Green Belt.</p>	<p>The Local Authority seeks to protect and enhance tourism within the District however additional development is required based on evidence which includes an Employment Land Review (ELR) 2016, updated 2018 and Objectively Assessed Housing Need (OAHN) studies 2016, updated 2018.</p>
	LPPO3877	Paragraph 10.21	Object	<p>I object to the Council's strategy and thinking for development. The Council states that there is a large contribution to the local economy brought by tourism. This will be harmed by over development of the small towns over their natural size bringing down the environment and pleasant setting. Tourists will not want to travel through acres of urbanised jungle to access sole-less town centre. Tourism will be damaged along with the economy by paving over the existing Green Belt.</p>	<p>The Local Authority seeks to protect and enhance tourism within the District however additional development is required based on evidence which includes an Employment Land Review (ELR) 2016, updated 2018 and Objectively Assessed Housing Need (OAHN) studies 2016, updated 2018.</p>

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	LPPO3878	Paragraph 10.22	Object	I object to the Council’s strategy and thinking for development. The Council states that there is a large contribution to the local economy brought by tourism. This will be harmed by over development of the small towns over their natural size bringing down the environment and pleasant setting. Tourists will not want to travel though acres of urbanised jungle to access sole-less town centre. Tourism will be damaged along with the economy by paving over the existing Green Belt.	The Local Authority seeks to protect and enhance tourism within the District however additional development is required based on evidence which includes an Employment Land Review (ELR) 2016, updated 2018 and Objectively Assessed Housing Need (OAHN) studies 2016, updated 2018.
	LPPO4729	10.23	Comment	The focus on tourism within this section relates to many attractions which are on the western side of the district. 10.23 notes that most are day trippers and I suspect that most come from the larger conurbation areas to the east. This makes the idea of building up to and beyond the A456 which is already a bottleneck across the town seems inconsistent with the words in this section.	Comments are noted.
	LPPO3879	Paragraph 10.23	Object	I object to the Council’s strategy and thinking for development. The Council states that there is a large contribution to the local economy brought by tourism. This will be harmed by over development of the small towns over their natural size bringing down the environment and pleasant setting. Tourists will not want to travel though acres of urbanised jungle to access sole-less town centre. Tourism will be damaged along with the economy by paving over the existing Green Belt.	The Local Authority seeks to protect and enhance tourism within the District however additional development is required based on evidence which includes an Employment Land Review (ELR) 2016, updated 2018 and Objectively Assessed Housing Need (OAHN) studies 2016, updated 2018.

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	LPPO616	10.23	Support	Support for paragraph 10.23.	Support for paragraph 10.23 is noted.
	LPPO1977	Economy	Comment	Town needs more investment in good quality well paid jobs not low pay. Better good quality business should be encouraged to come to Kidderminster and area before building on green fields.	Agree that investment to bring good quality well paid jobs is to be encouraged.
	LPPO4587	Section 10	Comment	<p>Employment Opportunities: There is no evidence that the suggested enhanced employment opportunities will be delivered. This is a worthy aspirational goal but currently the opposite appears to be the case in the Wyre Forest, with yet more closures being announced in the traditional industry. The Population Growth Figures which are excessive can only be achieved should this aspirational target be achieved</p> <p>The closure of many units in Worcester St. following the building of Weavers Wharf appears has created a void in the town centre. The consideration of urban living spaces in this now abandoned area could aid the regeneration of Kidderminster town. The siting of a cinema in this area could also be beneficial leaving the former site of WF Glades available for living space.</p> <p>The distribution of housing growth around the area will in turn make Kidderminster a more desirable location in which to reside. My wife and I moved to Spennells as there is good access onto the A448 and</p>	<p>Agree that changes in retail patterns have had a detrimental effect on Kidderminster town centre. The Local Authority has considered alternative uses to retail in the town centre to enhance vitality.</p> <p>Policy 10B and Policy 22A consider alternative uses in the town centres. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation, employment and residential.</p>

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				<p>we do not have to travel through the town centre to reach it. A spread of development around the town will be more appealing to potential incomers as a variety of development produces better access to other areas</p> <p>The demise of Worcester Street following the building of Weavers Wharf should be addressed and with imagination can create both opportunities for affordable housing units and aid the regeneration of the town centre. The building of a cinema on the site of Wyre Forest Glades needs to be further considered as the site could be suitable for apartments.</p>	
	LPP04864	Section 10	Comment	<p>With the development of Weavers Wharf many of the major high street stores relocated to this area with the consequence being that the shopping outside Weavers Wharf and Vicar Street has become non viable. The town centre is described in the review as being "attractive and accessible" which may have some merit for Weavers Wharf and Vicar Street but move away from this area all that can be seen are empty buildings and shops. Over the years I have lived in Kidderminster there have been numerous proposals for development and improvement in Kidderminster Centre reported in the local press with artists impressions however apart from Weavers Wharf none of these</p>	<p>Agree that changes in retail patterns have had a detrimental effect on Kidderminster town centre. The Local Authority has considered alternative uses to retail in Kidderminster town centre to enhance vitality and viability.</p> <p>Policy 10B and Policy 22A consider alternative uses in the town centre. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation and residential</p>

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				developments have ever been realised. Unless something is done in the short term I see no reason why anyone would want to live or set up business in Kidderminster.	
	LPPO3383	Option A	Object	<ul style="list-style-type: none"> Suggested growth in employment opportunities is not supported by current patterns. 	Wyre Forest District Council commissioned an Employment Land Review (ELR) in 2016 to assess economic development needs across the District. The findings were that up to 40 hectares of employment land was required within the District. In 2018 an update to the ELR was commissioned to ensure that the requirement for employment land is up to date.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Worcestershire County Council, Planning Economy & Performance	<u>LPP01222</u>	11.2	Comment	<p>The second sentence of para 11.2 states that, "The environment of Wyre Forest District is made unique by the valleys of the River Severn and River Stour and by the Staffordshire and Worcestershire Canal which all run through the District and help to shape the landscape". The Wyre Forest itself should be included as a major and distinctive landscape asset comparable to the rivers in terms of both character and significance within planning policy. It is the largest contiguous area of Ancient Woodland in England (source: Wyre Forest Landscape Partnership). The District shares approximately half of Wyre and its satellite woodlands with Shropshire, which is a significant area of landscape. Not least, the forest is a major Green Infrastructure hub in the district, which should be a material consideration in high quality design and reinforcing local distinctiveness.</p> <p>The Wyre Forest Landscape Partnership has developed a suite of documents that sets out the strategic importance of the forest and its setting. This includes action areas for biodiversity, landscape, historic environment, forestry, access and education, economy and tourism, which should inform design opportunities, where appropriate, to deliver better connectivity to the forest.</p>	<p>Comments on paragraph 11.2 noted.</p> <p>Agreed amend paragraph 11.2 second and third sentences to read:</p> <p>"The environment of Wyre Forest District is made unique by the valleys of the River Severn and River Stour and by the Staffordshire and Worcestershire Canal which all run through the District and help to shape the landscape. A major and distinctive landscape asset is the Wyre Forest itself, comparable to the rivers in terms of both character and significance within planning policy and being the largest contiguous area of Ancient Woodland in England (source: Wyre Forest Landscape Partnership)."</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	LPPO4757	11.4	Comment	<p><u>Objective: The provision of a comprehensive network of green spaces and corridors to help support a range of biodiversity.</u></p> <p>Green Belt (an important contributor in support of biodiversity) should be protected from development.</p> <p>Little evidence of “a network of green spaces and corridors” within urban Kidderminster. Objective unachievable without wholesale demolitions thus even more important remaining green space protected from creeping urban sprawl.</p> <p>Designated nature reserves should remain protected.</p>	Comments on paragraph 11.4 noted.
Gladman Developments Limited	LPPO1384	Policy 11A	Comment	<p>Whilst Gladman recognise the importance of high quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to site specifics and the character of the local area. There is not a 'one size fits all' solution in relation to design. Para.59 NPPF - “Design policies should avoid unnecessary prescription or detail and should concentrate on the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more</p>	<p>Comment on Policy 11 A noted.</p> <p>The Council's Adopted Design Quality SPD provides general design guidance in line with the Framework, it does not prescribe specific designs or details on proposed developments.</p>

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				generally." SPDs should avoid prescriptive design requirements that place an undue financial burden on development schemes.	
Worcestershire County Council, Planning Economy & Performance	<u>LPPO1371</u>	Policy 11A	Comment	Part C should be changed to become "...design processes set out within the latest <u>adopted</u> Design SPD (June 2015) and <u>adopted later revisions</u> ".	Comment on Policy 11 A noted. Amend Policy 11 A C to read: "...design processes set out within the latest <u>adopted</u> Design SPD"
Kidderminster Harriers Football Club	<u>LPPO952</u>	Policy 11A	Comment	Add to paragraph A. <u>New developments will need to be accessible for all users, including those with disabilities.</u>	Comment on paragraph 11 A noted. POLICY 9 Health and Well Being to have a further sentence added as follows: "New developments will need to be accessible for all users, including those with disabilities." Not all development affecting heritage assets can be made accessible for all.
	<u>LPPO2193</u>	Policy 11A	Comment	There needs to be an improved definition of high quality design. Whilst the idea of high quality is exemplary, is this achievable in large scale affordable developments where cost is key? With the high land values, density is often a prime factor resulting in cramped housing with a 'toy town' appearance. Environmentally sustainable systems should be built within dwellings from the outset i.e. solar panels – to avoid 'messy' piecemeal add-ons.	Comment on Policy 11 A noted. The Council's Adopted Design Guidance SPD (2015) sets out to guide development by explaining how developers can secure high quality design whilst at the same time both creating and reinforcing local distinctiveness and protecting & establishing landscape character.

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				Large sites could accommodate areas for solar panels to support energy conservation and sustainability.	
Place Partnership Ltd	<u>LPPO1091</u>	11.12	Comment	The recognition that crime and the fear of crime is often a big issue within local communities and can affect their well-being is welcomed and supported by WP, WMP and HWFRS. This provides the necessary underpinning for requesting the design and infrastructure measures needed to mitigate these problems in new development. This in turn will ensure the delivery of the objectives on this issue set out by paragraphs 58 and 69 of the NPPF.	Comments on Paragraph 11.12 noted.
North Worcestershire Community Safety Partnership	<u>LPPO27</u>	11.13	Comment	Point of accuracy - Wyre Forest Community Safety Partnership no longer exists. It was merged in 2011 with Bromsgrove and Redditch to form the North Worcestershire Community Safety Partnership. WFDC along with the other councils leads on the co-ordination of the partnership via the Community Safety Team.	Comment on paragraph 11.13 noted. Paragraph 11.13 to be amended to read: "The issue of crime and community safety is dealt with at a local level by the North Worcestershire Community Safety Partnership, which is the Crime and Disorder Partnership that operates across Wyre Forest District, Bromsgrove District and Redditch Borough Councils. WFDC along with the other councils leads on the co-ordination of the Partnership via the Community Safety Team. The Partnership brings together a variety of stakeholders who share the vision "Wyre Forest - an even safer place to live, work, visit or do business in".

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	<u>LPPO4059</u>	Policy 11B	Comment	Since the war and in particular in the 1960's 70's 80's Bewdley has greatly expanded and accommodated a lot of additional and substantial housing development on greenfield land totally altering the size character and layout of the town and increasing pressures on local services/transport provision etc. The same applies in many ways to Stourport	Comment on Policy 11 B noted.
Wyre Forest District Council - Development Control	<u>LPPO1209</u>	Policy 11B	Comment	Under A, would it be appropriate to add "both designated and undesignated heritage assets"?	Comment noted and Policy 11 B A to be amended to read: "Development proposals should protect, conserve and enhance both designated and undesignated heritage assets, including....."
	<u>LPPO4029</u>	Policy 11B	Comment	Public parks are a real asset that are well-used by local residents and should continue to be maintained and improved. However, it's disheartening to see litter and graffiti appearing time after time (at Brinton Park specifically) – the council is spending money cleaning it up only for it to reappear again. This money could be put to better use. Antisocial behaviour in general is affecting local residents and dog walkers, with little being done to stop the cycle.	Comments on Policy 11B B iii. noted. Comments on litter, graffiti and anti-social behaviour noted. The Council has legislative powers to tackle these issues, however the purpose of this plan is to guide development whereas these comments relate to existing issues within public parks.
	<u>LPPO4260</u>	Policy 11B	Comment	You will spoil a very nice rural community, as we do have lots of visitors and walkers.	Comments on Policy 11 B noted. The comments do not specify which part of the rural community will be "spoilt" nor how

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					implementation of Policy 11 B will affect visitors and walkers.
Bewdley Civic Society	<u>LPPO853</u>	Policy 11B	Comment	Policy 11B historic environment . Support but object in part (see policy 26A): It is illogical that converted barns (non-designated assets) cannot be subsequently extended when any other accommodation can, including listed buildings, houses in conservation areas etc. The impact of this highly untenable, harsh and prescriptive policy not to allow any extensions fails to follow NPPF advice, allow for improvements to the accommodation or to take account of changing family circumstances. All extensions should be considered on their merits within the historic qualities/parameters of original property i.e. under policy 26A.	Support for Policy 11B noted; objections in part to Policy 26A noted.
Gladman Developments Limited	<u>LPPO1385</u>	Policy 11B	Comment	Gladman note the inclusion of Policy 11B and Policy 26, which together provide policies relating to the historic environment. These policies must reflect guidance in NPPF paras. 126-141. paras. 133-134 sets out need to assess significance of designated heritage assets. Where there is less than substantial harm, this should be weighed against public benefits of proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm. Non-designated assets - policy should reflect para 135 - a balanced	Comment on Policy 11 B noted. The comments on reference to NPPF guidance relate to Policy 26. It is not the function of Local Plan Policies to repeat sections of the NPPF nor to reference specific paragraphs within the Framework. Reference to the Framework is sufficient to steer developers to the most up-to-date version in force at the time.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				judgement should be reached having regard to the scale of any harm and the significance of the heritage asset. In addition, any policy requirements for landscape protection should be fully justified as part of the council's proportionate evidence base and balanced criteria based policies drafted.	
Canal & River Trust	LPPO1011	Policy 11B	Comment	Canal corridor is designated a Conservation Area and we welcome references for development to build on historic significance whilst protecting their character and historic integrity. Policy 11B could include specific reference to Stourport Basin.	Comments on Policy 11 B noted. Policy 11B B vii. refers to "The historic inland port of Stourport-on-Severn" which is the basins.
Wyre Forest Green Party	LPPO1484	Archaeological Issues	Comment	Full archaeological surveys should be undertaken on Green Belt and greenfield land under consideration for development. For example, Spennells Fields have historical drainage ditches in this area of archaeological importance that should be protected and enhanced.	Comment on archaeological issues noted. The evidence base for the historic environment identifies those sites with known archaeological remains and other heritage assets recorded on the Worcestershire Historic Environment Record. On sites where there is no known archaeology it is acknowledged that there remains the potential for archaeological interest which may be discovered, recorded and submitted to inform the decision-making process prior to determination of planning applications.
Taylor Wimpey	LPPO1530	Policy 11B	Comment	No comments.	The respondent's "No comments" on Policy 11 B

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
West Midlands					is noted.
Taylor Wimpey West Midlands	<u>LPP01531</u>	Policy 11C	Comment	No comments.	The respondent's "no comments" on Policy 11 C is noted.
Worcestershire County Council, Planning Economy & Performance	<u>LPP01223</u>	Policy 11C	Comment	Reference to the Landscape Character Assessment Supplementary Guidance 2012 should be added to the second paragraph, such that it becomes "The Worcestershire County Council Landscape Character Assessment Supplementary Guidance (2012) and Historic Landscape Characterisation will be... "	Comment on Policy 11 C noted. Paragraph two to be amended to read: "The Worcestershire County Council Landscape Character Assessment Supplementary Guidance (2012 or as later amended) and Historic Landscape Characterisation will be... "
	<u>LPP04257</u>	11.29	Comment	You should take into consideration the amount of wildlife that would be disturbed.	Comments on paragraph 11.29 noted. Policy 11D details the criteria used to assess proposals for development which could impact on wildlife.
Worcestershire County Council, Planning Economy & Performance	<u>LPP01224</u>	11.29	Comment	Explicit reference should be made to the LCA Supplementary Guidance in paragraph 11.29. It is a document designed to inform planning and land management, and is a tool for planners, designers and local communities. The Supplementary Guidance is available here: http://www.worcestershire.gov.uk/downloads/file/4788/landscape_character_assessment_supplementary_guidance	Comment on paragraph 11.29 noted. The reference to the LCA is included in paragraph 128. Paragraph 11.28 to be amended as follows: "Worcestershire County Council has undertaken a Landscape Character Assessment (LCA) covering the rural areas of the county. The LCA is a tool for identifying those features that give a

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					<p>locality its sense of place, and is used to sub-divide the landscape into areas of similar character, classified as Landscape Types (7). The LCA Supplementary Guidance is a document designed to inform planning and land management, and is a tool for planners, designers and local communities.(8)</p> <p>Footnote: (8)</p> <p>http://www.worcestershire.gov.uk/downloads/file/4788/landscape_character_assessment_supplementary_guidance</p>
Wyre Forest Green Party	<u>LPPO1401</u>	Flooding	Comment	<p>We are concerned that issues of drainage and flooding have not been given serious enough consideration in the Draft Local Plan. Countryside typically has trees and hedgerows upon it which assist in water absorption and mitigates run-off, so replacing fields and hedgerows with urban development will literally have downstream effects.</p> <p>There is no indication/mention in the Local Plan of a Design Exceedence Flow Pathway, indicating what would need to be built into any new development in the event of a 'Flash Flood', to prevent 'runoff' from any new development causing flood damage to existing properties.</p>	<p>Comments on flooding noted.</p> <p>Flood Risk Management is the subject of a separate policy: Policy 15C and sustainable drainage is the subject of Policy 15D.</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Worcestershire County Council, Planning Economy & Performance	<u>LPP01227</u>	Policy 11E	Comment	The first two sentences of part A do not seem to be policy, and are more suited to the reasoned justification. A policy should not need to say that proposals should comply with its own contents or other policies.	Comments on Policy 11 E part A noted. Policy 11 E part A to be amended to read: "All proposals for development in or adjacent to the District's rivers and/or within an area at risk of flooding must also conform with WFDC Policy 15C"
Historic England	<u>LPP01276</u>	Policy 11E	Comment	Policy 11E - is the Staffordshire and Worcestershire Canal a Canal Conservation Area - if so it would be worth including this within the policy and a reasoned justification about this and how this will impact future development proposals. Under the rivers section we would recommend - 'Development which preserves <u>and enhances</u> the historic riverside character of Bewdley will be encouraged'.	Comments on Policy 11 E noted. Amend title of Policy 11 E B to read: "Staffordshire and Worcestershire Canal Conservation Area" Amend final paragraph of Policy 11 E A to read: "Development which preserves and enhances the historic riverside character of Bewdley will be encouraged" Reasoned justification Add paragraph 11.36 to read: "Proposals for development within or adjacent to the Staffordshire and Worcestershire Canal Conservation Area should accord with the most up-to-date Conservation Area Character Appraisal and management plan".

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Taylor Wimpey West Midlands	<u>LPP01535</u>	Policy 11E	Comment	No comments.	The respondent's "no comments" on Policy 11 E is noted.
Environment Agency	<u>LPP01063</u>	Policy 11E	Comment	<p>Assume that first sentence should refer to Policy 15 Water Management. These policies should be joined up so that any waterway regeneration includes enhancement in terms of wider water management.</p> <p>Suggest policy wording is changed to read 'Rivers are to be enhanced in accordance with Green Infrastructure, Biodiversity and <u>Water Management Policies</u></p>	<p>Comments on Policy 11 E noted.</p> <p>Policy 11 E part A first paragraph to be amended to read:</p> <p>"All proposals for development in or adjacent to the District's rivers and/or within an area at risk of flooding must also conform with WFDC Policy 15C"</p> <p>Policy 11 E part A second paragraph to read:</p> <p>"Rivers are to be enhanced in accordance with Green Infrastructure, Biodiversity and Water Management Policies"</p>
Worcestershire County Council, Planning Economy & Performance	<u>LPP01372</u>	11.33	Comment	This sentence should be amended as follows: "Two of the District's three main waterways: (the River Stour and the Staffordshire and Worcestershire Canal) pass..."	<p>Comment on paragraph 11.33 noted.</p> <p>Paragraph 11.33 to be amended to read:</p> <p>"Two of the District's three main waterways (the River Stour and the Staffordshire and Worcestershire Canal) pass through Kidderminster and Stourport-on-Severn, whilst the principal river, the Severn, passes through both Stourport-on-Severn and Bewdley."</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Wyre Forest Green Party	<u>LPP01475</u>	Recreation /Landscape /Visual Amenity	Comment	<ol style="list-style-type: none"> 1. Many fields threatened by this Draft Local Plan serve as popular recreational and social facilities for walkers, joggers, cyclists, dog walkers, and horse riders, amateur astronomers and wildlife and landscape photographers. There are a number of well-used Public Rights of Way and bridle ways across the fields which allow fast and easy access to open countryside. 2. The landscape around many areas, such as Spennells, is an important part of people’s lives, contributing to individual, community and national identity and offering a wide variety of benefits in terms of quality of life, well-being and economic opportunity. The ‘Guidelines for Landscape and Visual Assessment Report’ (2013), recognised that landscape provides a shared resource as a ‘public good’ – clearly seen by the current use of Spennells’ by residents. This Report also emphasised the need to improve the quantity and quality of publicly accessible open spaces, however this is not in the Local Plan. 	<p>Comments noted.</p> <p>Policy 9 Health and Well Being Parts 6, 9 and 10 and Paragraph 14.1 Strategic Green Infrastructure set out the Council's commitment to deliver a comprehensive network of green spaces and corridors across the District to help promote active lifestyles within attractive and safe public spaces.</p>
	<u>LPP04740</u>	Section 11	Comment	Section 11 A Unique Place	Comment on section 11 noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				Again it is not clear in some of the language used in this section whether reference to plans relates to this document or some other one. As an example within 11.5 there is a box in purple about responses to issues. It mentions options A and B which I assume relates to the options in this document but I'm not sure how or why.	Sections 1.11 to 1.13 explain the plan making process and explain how the "Issues and Options" consultation conducted in 2015 extensively informed the prepared of the Preferred Options document.
	<u>LPPO3883</u>	11.10	Object	The existing assets will become dwarfed by overly development of green field sites causing an imbalance by trying to artificially enlarge a town beyond its natural size. I therefore object.	Objection noted. The evidence base has identified those development sites which contain or are adjacent to heritage assets. Development proposals which impact on heritage assets must satisfy Policy 26 - Safeguarding the Historic Environment. Policy 26 section A considers impacts on setting.
	<u>LPPO3884</u>	11.11	Object	The existing assets will become dwarfed by overly development of green field sites causing an imbalance by trying to artificially enlarge a town beyond its natural size. I therefore object.	Objection noted. The evidence base has identified those development sites which contain or are adjacent to heritage assets. The justification in Paragraph 11.11 refers to the successful incorporation of heritage assets into development. Policy 26 section A allows decision makers to consider the impacts of development on the setting of these assets.
	<u>LPPO3691</u>	11.12	Object	11.12. 11.13 – Crime	Objection noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>- It is inevitable that crime and antisocial behaviour will increase in creation of such a huge Housing estate under Option A. New developments will have the opposite effect on reduction of crime. Design cannot prevent this.</p> <p>- This is due to crowding together, lack of open space, lack of good schooling. Neighbourhood disputes.</p> <p>This section does not go into enough detail as to the steps taken to prevent anti-social behaviour and petty crime.</p>	<p>The NPPF at paragraph 58 requires local planning authorities to: <i>"create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion"</i>.</p> <p>The Design Guidance SPD adopted June 2015 seeks to secure high quality development to create safe and accessible development, with sections on Landscape Quality in Residential Developments and Design of Space for Play.</p> <p>North Worcestershire Community Safety Partnership (which includes West Mercia Police) is invited to comment on all major developments.</p>
	LPPO3880	11.7	Object	<p>I object to the Council's strategy and thinking for development. The statements portray an idealised story but provide no evidence of attainment of high quality design or its definition and how it will be brought into practise. Past examples of the Council's involvement have brought very poor design and development and utilised land inefficiently. There is no confidence that this will not be repeated, therefore I object to the development proposals.</p>	<p>Objections noted, however the Design Guidance SPD adopted June 2015 is intended to guide planning decisions relating to development within the District as outlined in Policy 11A.</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	<u>LPPO3881</u>	11.8	Object	The Council needs to improve the existing development to demonstrate efficient land use before attempting to bring Green Belt into inefficient development. I therefore object. The Council is incapable of undertaking good quality development. I therefore object.	Objection to paragraph 11.8 noted. The Design Guidance SPD adopted June 2015 underlies the Council's commitment to improve the quality of development within the area. Application of this guidance will contribute to good quality development.
	<u>LPPO3882</u>	11.9	Object	The Council needs to improve the existing development to demonstrate efficient land use before attempting to bring Green Belt into inefficient development. I therefore object. The Council is incapable of undertaking good quality development. I therefore object.	Objection to paragraph 11.8 noted. The Design Guidance SPD adopted June 2015 underlies the Council's commitment to improve the quality of development within the area. Application of this guidance will contribute to good quality development.
	<u>LPPO3885</u>	Policy 11B.A	Object	Policy 11B.A will not be achievable with large scale housing development and over population of a naturally small market town of Kidderminster. Assets will become dwarfed and insignificant with their setting spoilt by having to drive through miles of urbanisation of a large town. I therefore object.	Objection to Policy 11B.A noted. Enlargement of the town of Kidderminster may affect the wider context of heritage assets within the historic core of the original market town irrespective of any inter-visibility. Development which directly impacts on these assets on adjacent brownfield sites is supported where it can protect, conserve and enhance the industrial urban landscape and surviving heritage assets and settings.
	<u>LPPO3692</u>	Policy 11B	Object	Policy 11 B Historic environment	Objection to Policy 11 B noted.

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				<p>Vii Note you refer to <i>The industrial urban landscape of the historic <u>market town</u> of Kidderminster</i></p> <p>Note that you refer to Kidderminster as a market town. Therefore why are you changing the uniqueness, distinctiveness by turning it into a commuter town?</p>	<p>To clarify: the paragraph quoted is Policy 11B B viii.</p> <p>Historically Kidderminster was a market town. It became industrialised in the 19th century. Policy 11 B seeks to protect, conserve and enhance the significance of heritage assets, including their setting, in particular the industrial urban landscape of [the historic market town of] Kidderminster with its surviving heritage assets and their settings.</p> <p>The reference to Kidderminster being turned "into a commuter town" is opinion that is contrary to policy in this Local Plan which is to encourage economic development within the District.</p>
	<p><u>LPPO3886</u></p>	<p>11.15 - 11.25</p>	<p>Object</p>	<p>Environment of the area will be damaged by enlarging towns at expense of valuable green fields. I therefore object to the proposals. Council has idealised view of a developed future but not supported by evidence with a rundown town centre and inefficient use of land. I object to its further attempts of enlargement.</p>	<p>Objection to paragraphs 11.15 to 11.25 noted.</p> <p>Policy 11B to which paragraphs 11.15 to 11.25 refer seeks to protect conserve and enhance the significance of heritage assets including at 11B.B ii. the historic landscape including locally distinctive settlement patterns, field systems, woodlands and commons and historic farmsteads and smallholdings.</p> <p>Historic Landscape Characterisation studies produced for Worcestershire County Council</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					provide an evidence base to inform assessments of the heritage value of historic landscapes subject to development proposals.
	<u>LPPO3888</u>	11.16	Object	Environment of the area will be damaged by enlarging towns at expense of valuable green fields. I therefore object to the proposals. Council has idealised view of a developed future but not supported by evidence with a rundown town centre and inefficient use of land. I object to its further attempts of enlargement.	<p>Objection to paragraphs 11.15 to 11.25 noted.</p> <p>Policy 11B to which paragraphs 11.15 to 11.25 refer seeks to protect conserve and enhance the significance of heritage assets including at 11B.B ii. the historic landscape including locally distinctive settlement patterns, field systems, woodlands and commons and historic farmsteads and smallholdings.</p> <p>Historic Landscape Characterisation studies produced for Worcestershire County Council provide an evidence base to inform assessments of the heritage value of historic landscapes subject to development proposals.</p>
	<u>LPPO3889</u>	11.17	Object	Environment of the area will be damaged by enlarging towns at expense of valuable green fields. I therefore object to the proposals. Council has idealised view of a developed future but not supported by evidence with a rundown town centre and inefficient use of land. I object to its further attempts of enlargement.	<p>Objection to paragraphs 11.15 to 11.25 noted.</p> <p>Policy 11B to which paragraphs 11.15 to 11.25 refer seeks to protect conserve and enhance the significance of heritage assets including at 11B.B ii. the historic landscape including locally distinctive settlement patterns, field systems, woodlands and commons and historic farmsteads and smallholdings.</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					Historic Landscape Characterisation studies produced for Worcestershire County Council provide an evidence base to inform assessments of the heritage value of historic landscapes subject to development proposals.
	<u>LPPO3890</u>	11.18	Object	Environment of the area will be damaged by enlarging towns at expense of valuable green fields. I therefore object to the proposals. Council has idealised view of a developed future but not supported by evidence with a rundown town centre and inefficient use of land. I object to its further attempts of enlargement.	<p>Objection to paragraphs 11.15 to 11.25 noted.</p> <p>Policy 11B to which paragraphs 11.15 to 11.25 refer seeks to protect conserve and enhance the significance of heritage assets including at 11B.B ii. the historic landscape including locally distinctive settlement patterns, field systems, woodlands and commons and historic farmsteads and smallholdings.</p> <p>Historic Landscape Characterisation studies produced for Worcestershire County Council provide an evidence base to inform assessments of the heritage value of historic landscapes subject to development proposals.</p>
	<u>LPPO3891</u>	11.19	Object	Environment of the area will be damaged by enlarging towns at expense of valuable green fields. I therefore object to the proposals. Council has idealised view of a developed future but not supported by evidence with a rundown town centre and inefficient use of land. I object to its further attempts of enlargement.	<p>Objection to paragraphs 11.15 to 11.25 noted.</p> <p>Policy 11B to which paragraphs 11.15 to 11.25 refer seeks to protect conserve and enhance the significance of heritage assets including at 11B.B ii. the historic landscape including locally distinctive settlement patterns, field systems, woodlands and commons and historic</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					<p>farmsteads and smallholdings.</p> <p>Historic Landscape Characterisation studies produced for Worcestershire County Council provide an evidence base to inform assessments of the heritage value of historic landscapes subject to development proposals.</p>
	<u>LPPO3892</u>	11.20	Object	<p>Environment of the area will be damaged by enlarging towns at expense of valuable green fields. I therefore object to the proposals. Council has idealised view of a developed future but not supported by evidence with a rundown town centre and inefficient use of land. I object to its further attempts of enlargement.</p>	<p>Objection to paragraphs 11.15 to 11.25 noted.</p> <p>Policy 11B to which paragraphs 11.15 to 11.25 refer seeks to protect conserve and enhance the significance of heritage assets including at 11B.B ii. the historic landscape including locally distinctive settlement patterns, field systems, woodlands and commons and historic farmsteads and smallholdings.</p> <p>Historic Landscape Characterisation studies produced for Worcestershire County Council provide an evidence base to inform assessments of the heritage value of historic landscapes subject to development proposals.</p>
	<u>LPPO3893</u>	11.21	Object	<p>Environment of the area will be damaged by enlarging towns at expense of valuable green fields. I therefore object to the proposals. Council has idealised view of a developed future but not supported by evidence with a rundown town centre and inefficient use of land. I object</p>	<p>Objection to paragraphs 11.15 to 11.25 noted.</p> <p>Policy 11B to which paragraphs 11.15 to 11.25 refer seeks to protect conserve and enhance the significance of heritage assets including at 11B.B ii. the historic landscape including locally</p>

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				to its further attempts of enlargement.	<p>distinctive settlement patterns, field systems, woodlands and commons and historic farmsteads and smallholdings.</p> <p>Historic Landscape Characterisation studies produced for Worcestershire County Council provide an evidence base to inform assessments of the heritage value of historic landscapes subject to development proposals.</p>
	<u>LPPO3894</u>	11.22	Object	<p>Environment of the area will be damaged by enlarging towns at expense of valuable green fields. I therefore object to the proposals. Council has idealised view of a developed future but not supported by evidence with a rundown town centre and inefficient use of land. I object to its further attempts of enlargement.</p>	<p>Objection to paragraphs 11.15 to 11.25 noted.</p> <p>Policy 11B to which paragraphs 11.15 to 11.25 refer seeks to protect conserve and enhance the significance of heritage assets including at 11B.B ii. the historic landscape including locally distinctive settlement patterns, field systems, woodlands and commons and historic farmsteads and smallholdings.</p> <p>Historic Landscape Characterisation studies produced for Worcestershire County Council provide an evidence base to inform assessments of the heritage value of historic landscapes subject to development proposals.</p>
	<u>LPPO3895</u>	11.23	Object	<p>Environment of the area will be damaged by enlarging towns at expense of valuable green fields. I therefore object to the proposals. Council has idealised view of a developed future</p>	<p>Objection to paragraphs 11.15 to 11.25 noted.</p> <p>Policy 11B to which paragraphs 11.15 to 11.25 refer seeks to protect conserve and enhance the</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				but not supported by evidence with a rundown town centre and inefficient use of land. I object to its further attempts of enlargement.	<p>significance of heritage assets including at 11B.B ii. the historic landscape including locally distinctive settlement patterns, field systems, woodlands and commons and historic farmsteads and smallholdings.</p> <p>Historic Landscape Characterisation studies produced for Worcestershire County Council provide an evidence base to inform assessments of the heritage value of historic landscapes subject to development proposals.</p>
	<u>LPPO3896</u>	11.24	Object	Environment of the area will be damaged by enlarging towns at expense of valuable green fields. I therefore object to the proposals. Council has idealised view of a developed future but not supported by evidence with a rundown town centre and inefficient use of land. I object to its further attempts of enlargement.	<p>Objection to paragraphs 11.15 to 11.25 noted.</p> <p>Policy 11B to which paragraphs 11.15 to 11.25 refer seeks to protect conserve and enhance the significance of heritage assets including at 11B.B ii. the historic landscape including locally distinctive settlement patterns, field systems, woodlands and commons and historic farmsteads and smallholdings.</p> <p>Historic Landscape Characterisation studies produced for Worcestershire County Council provide an evidence base to inform assessments of the heritage value of historic landscapes subject to development proposals.</p>
	<u>LPPO3897</u>	11.25	Object	Environment of the area will be damaged by enlarging towns at expense of valuable green	Objection to paragraphs 11.15 to 11.25 noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				fields. I therefore object to the proposals. Council has idealised view of a developed future but not supported by evidence with a rundown town centre and inefficient use of land. I object to its further attempts of enlargement.	<p>Policy 11B to which paragraphs 11.15 to 11.25 refer seeks to protect conserve and enhance the significance of heritage assets including at 11B.B ii. the historic landscape including locally distinctive settlement patterns, field systems, woodlands and commons and historic farmsteads and smallholdings.</p> <p>Historic Landscape Characterisation studies produced for Worcestershire County Council provide an evidence base to inform assessments of the heritage value of historic landscapes subject to development proposals.</p>
	<u>LPPO2174</u>	East of Kidderminster Hurcott area	Object	<ul style="list-style-type: none"> • New development will not protect and enhance the unique character of the landscape. • It will overlook houses in adjacent streets. 	<p>Objection to development at the East of Kidderminster - Hurcott Area is noted.</p> <p>New development must be sustainable if it is to accord with the National Planning Policy Framework. If this site is selected for inclusion within the Site Allocations for the pre-submission Local Plan, officers and members will have considered whether any adverse impacts of development would be significantly and demonstrably outweighed by the benefits that development will bring.</p>
Gladman Developments Limited	<u>LPPO1386</u>	Policy 11C & 11D	Object	Policies 11C & 11D fail to reflect NPPF emphasis on natural environment. NPPF para.113 refers to need for criteria based policies in relation to proposals affecting protected wildlife or	Objection and comments are noted. Since the Preferred Options document was published the Government has revised its NPPF, which was published in July 2018. NPPF para 113 that is

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				geodiversity sites or landscape areas and any protection should be commensurate with their status. Current policy wording is not in accordance with NPPF.	referred to in this consultation response has been removed from the revised NPPF. Policy 11D has been updated to be compliant with the revised NPPF.
	<u>LPPO1721</u>	New Road, Far Forest BR/RO/7	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> Threat to wildlife. 	<p>Objection to proposed development site New Road, Far Forest BR/RO/7 noted.</p> <p>Comments on paragraph 11.29 noted.</p> <p>Policy 11D details the criteria used to assess proposals for development which could impact on wildlife.</p>
	<u>LPPO3898</u>	11.30	Object	<p>What the Council believed should happen and what actually happens in practise are completely at odds when the Council is involved. There is no previous evidence that it can use land efficiently and sensitively with good design. I therefore object to its proposals.</p>	<p>Objection to Paragraph 11.30 noted.</p> <p>The objection is based on the assumption that the Council will not be able to deliver the supplementary guidance on the landscape character of the Severn Valley nor designate the Severn Valley Railway as a Conservation Area, but there is no evidence submitted by the objector to support this assumption.</p>
	<u>LPPO1822</u>	Burlish Crossing LI/5	Object	<ul style="list-style-type: none"> Would lose the view from back garden. Wildlife would be affected. 	<p>Objection to Burlish Site LI/5 noted.</p> <p>The Options referred to in Policy 11 Summary of Issues and Options Responses are related to the Design and Local Distinctiveness section of the 2015 consultation document, and not the Preferred Options Consultation Document of</p>

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					2017.
	<u>LPPO2204</u>	Option A - Spennells	Object	<ul style="list-style-type: none"> • Will destroy the environment. • Expansion on Green Belt is lazy and irresponsible - only done because it's cheaper and quicker. • Many brownfield sites are available that need renovation and could serve better locations for new houses. • Green Belt should only be used as last resort. 	<p>Objection to Option A noted.</p> <p>The Options referred to in Policy 11 Summary of Issues and Options Responses are related to the Design and Local Distinctiveness section of the 2015 consultation document, and not the Preferred Options Consultation Document of 2017.</p>
	<u>LPPO2207</u>	Option A - Spennells	Object	<ul style="list-style-type: none"> • The countryside around Spennells is good for tourism and economy. • Loss of habitat. • The development would be an insult on nature and the local residents. • Many local residents use the surrounding country side for leisure purposes. 	<p>Objection to Option A noted.</p> <p>The Options referred to in Policy 11 Summary of Issues and Options Responses are related to the Design and Local Distinctiveness section of the 2015 consultation document, and not the Preferred Options Consultation Document of 2017.</p>
	<u>LPPO3227</u>	A Unique Place	Object	<p>The ecology and natural beauty of the whole Wyre Forest area will be severely compromised.</p> <p>The balance of nature is already precarious.</p> <p>The government's present housebuilding policies will damage our countryside forever.</p>	<p>Objection to Section 11 A Unique Place noted.</p> <p>The District has no option but to make provision for the construction of sustainable new housing developments within the Plan to accord with Government Policy. As part of the planning process the tests for sustainability consider the impacts on the natural environment.</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>Future generations will look back and weep at the decisions of today and the destruction caused through knee-jerk reaction to rampant immigration which has been enabled over the last 15 years.</p> <p>The intention to build more than 25,000 new homes this Parliament and up to 225,000 in the longer term demonstrates this.</p>	
	<u>LPPO3690</u>	Section 11	Object	<p>Statements are at complete odds to the proposals in Option A</p> <p>The fields are used by many for well being, cycling, walking, nature walks, education, and wildlife preservation.</p> <p>Option A is contradictory with your proposals under this section.</p> <p>Impacts of using Option A will be a less unique place, increased health and mental health problems, increase obesity and destruction of wildlife.</p>	<p>Objection to Section 11 noted.</p> <p>The Options referred to in Policy 11 Summary of Issues and Options Responses are related to the Design and Local Distinctiveness section of the 2015 consultation document, and not the Preferred Options Consultation Document of 2017.</p>
	<u>LPPO1707</u>	Plough Lane, Far Forest	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> • Noise increase. • New development will have a massive 	<p>Policy 11B B refers to support for development which protects, conserves and enhances the significance of heritage assets.</p> <p>Part ix. identifies these assets as including rural</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				affect on natural beauty.	villages within the District, including their associated Conservation Areas and buildings, along with their settings and historic views to and from the surrounding countryside. This part of the policy is designed to set the bar in these environments to ensure that development protects, conserves and enhances them. Development which does not would thus not be supported.
	<u>LPP01734</u>	New Road, Far Forest BR/RO/7	Object	Objects on the following reasons: <ul style="list-style-type: none"> • More development could deter residents and tourists to the rural village as it will lose its natural aesthetic. • No positive affects for the residents in the area - will just cause problems for them. 	Objection to development site New Road, Far Forest BR/RO/7 noted.
	<u>LPP01898</u>	Burlish Crossing (LI/5), Lickhill Rd North (LI/6/7), Steatite Way (MI/6)	Object	<ul style="list-style-type: none"> • Burlish Top has historical and wildlife value. • Wyre Forest Gold Club, corner of Kingsway was subject to fly-tipping - do we know what has been dumped here? • A water table has been affected causing flooding in some adjacent properties. 	Objection to Burlish Crossing (LI/5), Lickhill Rd North noted. The Options referred to in Policy 11 Summary of Issues and Options Responses are related to the Design and Local Distinctiveness section of the 2015 consultation document, and not the Preferred Options Consultation Document of 2017.

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Historic England	LPP01273	Policy 11A	Support	We support Policy 11A	Support for Policy 11A noted.
Taylor Wimpey West Midlands	LPP01532	Policy 11A	Support	Aspirations are supported.	Support for Policy 11A noted.
Bewdley Civic Society	LPP0848	Policy 11A	Support	Support for Policy 11A.	Support for Policy 11A noted.
Chaddesley Corbett Parish Council	LPP01040	Policy 11A	Support	We support this policy, and suggest that there should be a reference to ensuring diversity of design and appearance, especially in larger developments, to guard against copy/paste designs that deliver unattractive mass uniformity. Given the scale of the Eastern area defined as 'core sites', perhaps a small village/settlement approach to releasing and developing these areas might help to deliver distinctive and quality designs and attractive places to live?	Support for Policy 11A noted. In respect of the comments: " <i>reference to ensuring diversity of design and appearance, especially in larger developments, to guard against copy/paste designs that deliver unattractive mass uniformity</i> ", which read as being related to housing, these are to be contained within a revised version of the Design Guidance SPD (in the section Design Principles for Residential Development - Larger Scale Developments 3.37 to 3.50).
	LPP02634	Policy 11A	Support	We support the following: Policy 11A Local distinctiveness.	Support for Policy 11A noted.
	LPP04855	Policy 11A	Support	Support Policy 11A.	Support for Policy 11 A noted.
	LPP0618	11.8	Support	Support for paragraph 11.8.	Support for paragraph 11.8 noted.
	LPP04856	Policy 11B	Support	Support Policy 11B.	Support for Policy 11 B noted.
Bewdley Town Council	LPP0830	Policy 11B	Support	Policy 11B is to be supported, and in particular the importance of preserving Bewdley's setting, open spaces and views of the town.	Support for Policy 11 B noted.

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Historic England	LPPO1274	Policy 11B	Support	We support Policy 11B for the Historic Environment and the accompanying reasoned justification text.	Support for Policy 11 B noted.
	LPPO2635	Policy 11B	Support	We support the following: Policy 11B Historic Environment.	Support for Policy 11 B noted.
Historic England	LPPO1275	Policy 11C	Support	We support Policy 11C and the reference to historic landscape character and the available evidence base.	Support for Policy 11 C noted.
Bewdley Civic Society	LPPO854	Policy 11C	Support	Support for Policy 11C.	Support for Policy 11C noted.
	LPPO619	Policy 11C - B	Support	Support for Policy 11C bullet point B - Severn Valley Heritage Park.	Support for Policy 11 C Part B noted.
	LPPO600	11.26	Support	Landscape around Bewdley contributes much to its historic setting as a Georgian town surrounded by fields gently transitioning to the Wyre Forest should be protected to preserve the environment and to maintain its attractiveness for tourists.	Support for paragraph 11.26 noted.
	LPPO599	11.30	Support	I believe that it is important not only to protect the landscape of the river Severn itself, but of those landscapes that are view-able from the river valley as these are a valuable part of its unique setting.	Support for paragraph 11.30 noted.
Bewdley Town Council	LPPO832	Policy 11E	Support	In terms of Bewdley's riverside, policy must allow for sensitive regeneration of specific riverside areas.	Support for Policy 11 E noted.

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Canal & River Trust	LPPO1012	Policy 11E	Support	The Trust welcomes Policy 11E which supports positive canalside development for the creation of an attractive and high-quality environment.	Support for Policy 11 E noted.
Ramblers Association	LPPO4876	Section 11	Support	Walking both healthy and enjoyable. Enjoyment stimulated by beauty of environments accessed. Wyre Forest particularly well-endowed. Ramblers Association supports Section 11 and Policy 25: Green Belt should restrict urban sprawl. Urges District Council to maintain and implement these policies vigorously without allowing the local plan process to water them down.	Support for Section 11 noted.
	LPPO572	11C	Support	Support for Policy 11C.	Support for Policy 11C noted.
	LPPO620	Policy 11E	Support	Support for regenerating the waterways.	Support for [Policy 11 E] Regenerating the Waterways noted.
Worcestershire County Council, Planning Economy & Performance	LPPO1225	Policy 11D	Comment	We strongly support the aspiration of the plan to deliver net-gain for biodiversity and would welcome the opportunity to work with WFDC to refine the policy as the local plan develops. To achieve this we recommend that preliminary ecological assessment or biodiversity impact assessments are undertaken as early as possible in the planning process (including prior to allocation) to establish the baseline biodiversity, evaluate each site's deliverability and to determine how net gain for biodiversity can be	Comments are noted. Agree with many of these issues raised. We also welcome the opportunity to work with WCC to refine this policy as the emerging Local Plan progresses.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>delivered.</p> <p>The policy refers to the "ecological network of wildlife corridors" which link "biodiversity areas", including areas identified for habitat restoration and creation.</p> <p>These "ecological networks and wildlife corridors" should be explicit and clearly included within the Policies Map or other map, and the evidence base behind their definition clearly expressed and robustly defensible.</p> <p>A clear definition of biodiversity net-gain should also be provided to accompany the policy and to ensure that net gain is clearly defined and a process for its determination is in place. A simple target should be established to demonstrate net-gain has been achieved for a given scheme. This could be, for instance, that post-development the baseline biodiversity unit value receives 25% biodiversity unit uplift. This calculation would ideally be independently audited by a third party and confirmed in writing by the Local Planning Authority as part of the planning process pre-determination or through condition discharge. This approach would be similar to that adopted within the April 2014 Biodiversity & Development SPD supporting Lichfield District Council's adopted plan</p>	

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				<p>(February 2015).</p> <p>We would recommend the Principles and Guidance for Biodiversity Net Gain (https://www.cieem.net/biodiversity-net-gain-principles-and-guidance-for-ukconstruction-and-developments) as a source of information and guidance. It should be noted that further guidance on biodiversity net-gain is intended to be produced by CIEEM and partners in early 2018.</p> <p>The following additional wording is proposed to be added to the reasoned justification: "In order to accurately determine whether no net loss and enhancement or net gain for biodiversity can be delivered by development, the LPA expects that, when requested, precise ecological assessment by suitably qualified people to accepted national standards is undertaken, sufficient to determine net impacts/change".</p> <p>We would welcome further dialogue with regards whether a collaborative project could be initiated to formulate a locally tailored 'biodiversity metric' to help with this calculation. For instance, this could incentivise measures such as sustainable urban drainage (green roofs, living walls etc) which have both biodiversity value as well as contributing towards the</p>	

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				<p>aspirations for flooding and surface water drainage threaded throughout the Plan elsewhere. The aspirations for conservation of acid grassland, heathland and wetland networks could also be given greater weight through a locally tailored biodiversity calculator.</p> <p>We strongly support the requirement for enhancement measures for biodiversity to be required at all scales of development (where appropriate to do so) and especially for enhancement features to be required within the built development. Inexpensive and valuable enhancement measures, especially when considered at this early and strategically cohesive manner, will enable small scale developments to also demonstrate how they have achieved net-gain for biodiversity.</p> <p>Further cross-reference should be made to the emerging suite of Green Infrastructure Concept Plans (see comments under policy 14) which can provide more detailed and locally appropriate enhancement specifications.</p> <p>Development should provide for the long term management and monitoring of biodiversity features retained and enhanced within the site and for those features created off-site to compensate for development impacts. It should</p>	

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				be noted that the 2017 EIA Regulations place greater weight both on the requirement to monitor mitigation measures and for access (by both regulator and applicant) to suitable expertise in order to evaluate EIA proposals.	
Wyre Forest Friends of the Earth	LPP01316	Policy 11D	Comment	<p>We are concerned about the impact of 6,000 homes on the natural environment. A particularly sensitive site is the Wilden Pools adjacent to the Wilden Marsh SSSI. Development at Wilden could affect the water table and hence the marsh environment. Hurcott Pastures SSI and Hurcott Woods Local Nature Reserve are also areas where new housing developments could damage the local ecosystem.</p> <p>Spennells Fields offer a range of habitats including important nesting sites for Corn Buntings, Skylarks, and Linnets along with badger setts and bat roosts. Corn Buntings, Linnets and Skylarks require large open spaces to thrive and would not nest in a “Green Corridor”.</p>	Comments are noted. Agree that the protection of SSSI sites within the District is important. The emerging Local Plan will aim to continue the protection of the SSSI sites.
Wyre Forest Green Party	LPP01399	Policy 11D	Comment	<p>We are concerned about the impact of homebuilding and roads on the natural environment. A particularly sensitive site is the Wilden Pools adjacent to the Wilden Marsh SSSI. Development at Wilden could affect the water table and hence the marsh environment.</p>	Comments are noted. Ecological assessments of potential allocation sites with wildlife concerns will be undertaken in the next stage of the Local Plan Review.

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				<p>Hurcott Pastures SSSI and Hurcott Woods Local Nature Reserve are also areas where new housing developments could damage the local ecosystem and species therein.</p> <p>We would expect full ecological surveys to be done on each parcel in the Local Plan when development is considered. The Draft Local Plan is light on recognising ecological constraints on development apart from mentioning mitigation at Hurcott Pastures and discounting land adjacent to Puxton Marsh. Spennells Fields, for instance, is said to have no nature conservation interests pertaining to them, however the area offers a number of different habitats for wildlife, including important nesting sites for corn buntings, larks and linnets (all of which are included on the red list as endangered birds), badger setts and bat roosts (common pipistrelle, soprano pipistrelle and brown long-eared bat species). Also sighted in Wyre Forest in areas earmarked for development are European Otters. The rare Tower Mustard plant thrives along the lanes adjoining Stanklyn Lane. Endangered species like the Corn Bunting, Linnets and Skylarks would not nest in an area of 'Green Corridor' adjacent to a large housing development as they need wide, open spaces to thrive. Tree Preservation Orders on old and venerable trees and woodlands must be</p>	

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				respected.	
Taylor Wimpey West Midlands	LPP01534	Policy 11D	Comment	Requirement of development to deliver “a net gain in biodiversity” is not in accordance with the NPPF which, at paragraph 109, requires the planning system to “minimising impacts on biodiversity and providing net gains in biodiversity where possible”, clearly not a blanket requirement for biodiversity gains.	<p>‘Sustainable development’ is the golden thread that runs through the whole of the NPPF. The ‘environment’ is one of the three dimensions to sustainable development. The NPPF para 7 states that an environmental role is: “contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.” The NPPF para 9 states that: “Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life, including:</p> <ul style="list-style-type: none"> • Moving from a net loss of bio-diversity to achieving net gains for nature.” <p>The NPPF aspires for 'net gain' or expects 'no net loss' <u>at a minimum</u>. Therefore, it is implied that <i>any</i> biodiversity loss could fail the NPPF's Sustainable Development principles and could constitute significant harm. Paragraph 2 of the National Planning Policy Framework (NPPF) (DCLG 2012) states that "Planning policies and decisions must reflect and, where appropriate,</p>

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					promote relevant EU obligations and statutory requirements."
	LPP04780	Policy 11D	Comment	<p>There are supportive words in the Draft Local Plan about “protecting and enhancing biodiversity and geological conservation”. However, any development on the natural environment in countryside areas will have serious negative impacts.</p> <p>A particularly sensitive site is the Wilden Pools adjacent to the Wilden Marsh SSSI. Development at Wilden could affect the water table and hence the marsh environment. Hurcott Pastures SSSI and Hurcott Woods Local Nature Reserve are also areas where new housing developments could damage the local ecosystem and species therein.</p> <p>I would expect full ecological surveys to be done on each parcel in the Local Plan when development is considered. The Draft Local Plan is light on recognising ecological constraints on development apart from mentioning mitigation at Hurcott Pastures and discounting land adjacent to Puxton Marsh.</p>	Comments are noted. Further evidence base work is being done to inform the next stage of plan-making. This will include ecological appraisals of potential site allocations. This evidence will be used to inform the site selection process and will be made available at the Pre-Submission consultation stage for public viewing.
	LPP01703	Plough Lane, Far Forest	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> Wildlife conservation: natural habitat 	Objection and comments are noted.

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				will be affected.	
	LPP01722	New Road, Far Forest BR/RO/7	Object	Objects on the following reasons: <ul style="list-style-type: none"> Threat to wildlife. 	Objection and comments are noted. However, comments on proposed site allocations are not relevant to Policy 11d. Therefore no policy change required.
	LPP01737	New Road, Far Forest BR/RO/7	Object	<ul style="list-style-type: none"> Wildlife and habitats will be lost. 	Objection and comments are noted. However, comments on proposed site allocations are not relevant to Policy 11d. Therefore no policy change required.
	LPP03693	Policy 11D	Object	<p>There are many distinct varieties of plant and animal life in Spennells fields. These range from bees, butterflies, unique pollinators, the cinnabar moth, there are kestrels, Badgers, Skylarks, Linnets and Bats all these have been recorded.</p> <p>It provides a good and unique variety. That will be lost should Option A take place. No amount of design will enable these plant and animal life to flourish if Option A goes ahead.</p> <p>Option A will have a detrimental impact on the wildlife that feeds and lives on the fields and surrounding areas. There are Bats and Badgers in the area. In Britain all bat species and their roosts are legally protected, by both domestic and international legislation. Badgers and their</p>	Objection and comments are noted. However, comments on proposed site allocations are not relevant to Policy 11d. Therefore no policy change required.

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				setts (tunnels and chambers where they live) are protected by UK law. The skylark is fully protected under the Wildlife and Countryside Act 1981, which makes it an offence to kill, injure or take an adult skylark, or to take, damage or destroy an active nest or its contents. I therefore object to Option A on the basis of it being unlawful and not encouraging bio diversity.	
	LPP03899	Policy 11D	Object	There is no previous evidence that the Council can use land efficiently and sensitively with good design. I object to these proposals.	Objection is noted.
Worcestershire County Council, Planning Economy & Performance	LPP01226	11.32	Comment	The second sentence refers to sites being linked into a "detailed" network. The word "detailed" seems an unusual one; something like "more comprehensive and robust" may be better.	Comment is noted. Suggested change will be considered.
Worcestershire Wildlife Trust	LPP01059	Policy 11D	Comment	<p>We are pleased to support the intent of this policy and the weight it gives to enhancement as well as protection of biodiversity. We would however recommend some amendments, which we believe would aid clarity and provide a more robust policy framework in this regard.</p> <p>We welcome the proposal to take full account of the ecological network of wildlife corridors in decision making as set out in Section 1. It is important that the policy takes a wider view</p>	Comments are noted. We welcome the opportunity to work with Worcestershire Wildlife Trust and Worcestershire Green Infrastructure Partnership to develop the evidence base for this policy and to refine the policy further as the emerging Local Plan progresses.

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				<p>than just focussing on designated sites and so we endorse this approach. We would however recommend that the relevant corridors be mapped or otherwise defined so as to aid clarity in future. In connection with this we would also recommend that the 'corridors' take account of associated habitats listed under Section 41 of the NERC Act 2006 and BAP priorities. We would further recommend that the council engages closely with partner organisations including the Wildlife Trust and Worcestershire Green Infrastructure Partnership to develop the evidence base for this before the final plan is submitted.</p> <p>We fully support the need for development to deliver net gains in biodiversity as set out in Section 2. We would however recommend that you delete the word 'major' from the first sentence so that it reads '<i>Net gains in biodiversity will be sought from all development proposals...</i>' The last two sentences of Section 2 make clear that gains sought will be proportionate to the scale of development and that gains within the built environment will be sought for all scales of development and so we do not believe that the modifying word is required in the first sentence. There will be many cases where relatively small developments can offer biodiversity enhancement (for example</p>	

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>through careful consideration of landscaping elements) and these should be sought where possible. It would be helpful to define biodiversity net gain in this context so that all parties are clear about what is expected in this regard. Recently established principles for this can be found in 'Biodiversity Net Gain – Good practice principles for development' jointly produced by CIRIA, CIEEM and IEMA and guidance on implementation of net gain processes is being developed for release in early 2018. It will also be necessary to be able to determine the starting point for net gain discussions and so securing an appropriate level of biodiversity information will be important. Guidance on this is available (for example in BS42020:2013 Biodiversity – Code of practice for planning and development) and we would be pleased to discuss the practicalities of this with the council in due course.</p> <p>Finally, we would recommend that you re-draft Section 4 to read '<i>...development will provide for the long term management and monitoring of biodiversity...</i>' so as to more accurately reflect the need to monitor results in order to inform future management decisions.</p>	
	LPPO601	11D	Support	As well as SSSIs & Nature reserves, transitional habitats between them and settlement	Comments are noted.

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				<p>boundaries must be protected.</p> <p>North and west of Bewdley fields between the forest and the town are vital for large numbers of bird & insect species which would suffer if these open spaces were lost. Many species from the forest also uses these open fields for hunting and feeding.</p>	

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 12: STRATEGIC INFRASTRUCTURE

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Miller Homes	LPP0977	Policy 12	Support	<p>Support the inclusion within Part B of proposed Policy 12 of a ‘subject to viability’ clause with respect to the requirement for development to provide or contribute, financially or in kind, towards the provision of infrastructure needed to support it.</p> <p>The National Planning Policy Framework (NPPF) requires that:</p> <p><i>“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable”.</i></p> <p>The NPPF identifies that where obligations are being sought through the determination of planning applications, LPAs should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled or undelivered due to viability issues.</p>	Comments and support noted for ensuring viability is considered.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				Important for the new Local Plan to take appropriate evidence and development viability into consideration when setting and applying policies relating to providing and contributing towards strategic infrastructure.	
Canal & River Trust	LPPO1014	Policy 12	Object	Previous comments on Infrastructure Delivery Plan do not appear to have been taken into account in this document or latest IDP.	Policy 12 does not preclude Canal & River Trust infrastructure and is a policy for all infrastructure providers. The IDP has live status and will continually be updated prior to the next stage of consultation. As part of this process your comments will be considered.
Chaddesley Corbett Parish Council	LPPO1041	Policy 12	Comment	There will be a continuing need to recognise the importance (for business and employment) of ease of access to major road and rail infrastructure, underlining the importance of supporting the redesign of Mustow Green and other improvements to other routes providing access toward Birmingham and Worcester.	Policy 12 does not preclude works to this area. Any improvements required will be identified by transport modelling being undertaken by the highways authority Worcestershire County Council.
Environment Agency	LPPO1064	Policy 12	Support	We would encourage an integrated approach to infrastructure delivery, as set out in Policy 12, whilst maximising opportunities for providing flood risk management benefits as part of wider infrastructure works.	Comments and Support Noted. Flood Risk requirements will be included within the IDP.
Worcestershire County Council, Planning	LPPO1228	Policy 12	Comment	Education Provision: Current analysis of established households and child data, as at the population census	Comments noted and WFDC will continue to work with WCC children's services to establish

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Economy & Performance				<p>2011, derived a pupil yield of 0.28 pupils per dwelling.</p> <p>At primary school level, known children data is only available for 4 years from the current date, as the data is based on actual births. At primary school level, there is localised surplus capacity within the area to support elements of housing growth but this will be insufficient to meet the needs of the proposed growth. However, this is not consistent and in some schools there are either no surplus places or insufficient surplus places to maintain an acceptable level of places for families moving in to the area or to absorb the additional places required as a result of housing development. Therefore, where there is a need for additional places within an area additional provision will be required to support the level of housing set out in the local plan.</p> <p>At secondary school level, pupil numbers across Kidderminster are set to increase as a result of higher primary school numbers coming through the system and are set to rise to 649, exceeding the published admission number (or 'PAN', which sets out the number of pupils that can be admitted into each year group) of 635 in September 2021. Current forecast data suggests that pupil numbers will remain at or above PAN for the foreseeable future which may result in a need to expand secondary schools to accommodate pupil number growth from development. In Stourport, secondary school pupil numbers are set to increase and exceed the PAN of 224 from September 2018 onwards. Current forecasts suggest that pupil numbers will</p>	future need for school places through the plan development lifetime.

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				<p>remain at or above PAN for the foreseeable future, again with the resultant need to expand secondary schools. In Bewdley, current forecasts suggest that secondary school pupil numbers are not anticipated to exceed the PAN for the foreseeable forecast period up to 2026, but this will be reviewed regularly and may change as a result of changing circumstances including development plan allocations and windfall.</p> <p>In conclusion, there are currently sufficient school places within the area to maintain the current level of forecast pupil numbers before any development takes place. Where there is an identifiable need, for example in the secondary phase of education in Stourport, the Local Authority will continue to adapt to demographic change in ensuring there is a sufficient supply of statutory school age places within the Wyre Forest area.</p> <p>Children, Families and Communities (WCC) have no specific preference for the options put forward under Option A and Option B. However, pockets of growth consisting of small-scale development will support existing infrastructure in rural locations, although the accumulative impact of such development may result in a need for either school expansions or new schools. Any school expansions will be subject to discussion with existing schools. Large-scale development will have a wider and more far-reaching impact on school places and, depending on the outcomes of this consultation, it is most likely that a new primary school will be required to support the level of provision in the east</p>	

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				<p>of Kidderminster as set out under options A and B. The IDP provides further detail of options.</p> <p>The Local Authority will continue to monitor pupil numbers and, where new infrastructure is required as a direct result of housing proposals, will seek to mitigate the impact of the development on education provision through s106 developer contributions.</p>	
Taylor Wimpey West Midlands	LPPO1536	Policy 12	Comment	<p>Policy acceptable in principle but does not refer to CIL and how this will be used to fund strategic infrastructure. The mechanisms by which the strategic infrastructure is to be delivered should be clearly set out to ensure that developers are fully aware of any requirements relating to their schemes so that the necessary financial planning relating to securing land options/agreements can be undertaken from the outset.</p> <p>An Eastern Relief Road will require a funding mix, which could include the utilisation of monies collected through a CIL charging schedule.</p>	The policy is designed to allow for all funding methods to infrastructure. CIL scoping will be considered within the next viability run scheduled for the summer of 2018. No policy change required.
	LPPO1953	Policy 12 Infrastructure	Object	<ul style="list-style-type: none"> • Overcrowded schools currently. • 3 local hospitals are in special measures. • Impossible to get a doctors appointment currently. 	Policy 12 allows for infrastructure projects to be funded requirements for new provision is undertaken by the appropriate infrastructure provider and detailed within the IDP. No change required.
	LPPO2004	Policy 12	Comment	<ul style="list-style-type: none"> • Need to solve our current problems before adding 	Existing problems with public

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		Infrastructure		<p>to the load.</p> <ul style="list-style-type: none"> • Need to address all the inadequacies of today - emergency services, doctors, roads etc. 	services are the responsibility of the appropriate service provider. This policy is designed to allow for new infrastructure works to be carried out as necessary. No change required.
	LPPO2320	Policy 12 Infrastructure	Object	<ul style="list-style-type: none"> • Infrastructure will also need to be developed if Spennells/Offmore is extended. • Will increase pressure on health services, schools etc. • Could potential create jobs but would local people get these jobs? 	This policy will allow for new infrastructure as identified by the provider. No change required.
	LPPO3367	Policy 12	Object	Can Kidderminster sustain such an increase of population? Infrastructure: Doctors, Schools, Dentists, jobs, roads and bus services, which are under pressure now. Hospitals alone are another argument.	This policy will allow for new infrastructure as identified by the provider. No change required.
	LPPO3639	Paragraph 12.2	Object	I oppose using a more substantial urban extension for development on greenfield sites, as I believe our local housing needs can be met without using this.	This policy responds to the settlement strategy. Thus the policy itself is correct for the current strategy. No change required.
	LPPO3901	Paragraph 12.2	Object	The Council has ignored 3 independent analyses that shows that development of Green Belt is unnecessary. I strongly object to this plan.	There is no mention of Green Belt within this paragraph. This policy is designed to allow for infrastructure as required not decide where new development

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					is located. No change required.
	LPP03902	Paragraph 12.3	Object	The Council has ignored 3 independent analyses that shows that development of Green Belt is unnecessary. I strongly object to this plan.	There is no mention of Green Belt within this paragraph. This policy is designed to allow for infrastructure as required not decide where new development is located. No change required.
	LPP03696	12.3	Object	<p>From the WFIDP it appears that the Council has already preferences for Option A and have not considered this fairly. It appears that “Governments funding will be granted to those who bid unlock the most homes in areas of greatest housing need”</p> <p>In addition additional funding will be received for Eastern By pass.</p> <p>It appears that the WFDC is motivated by this funding and not for the character of Kidderminster, the residents of Kidderminster, the landscape of Kidderminster.</p> <p>I would question and challenge –“greatest housing need “as per statistics see 1 Introduction and context comments.</p> <p>The need is not as you have suggested and described a large amount of exaggeration is included in your submissions.</p> <p>WFIDP identifies additional Policing costs for Option A. Also, Option B does not need as much roadwork and section</p>	From a strategic infrastructure policy perspective these comments will require no change. The WFIDP is a living document and will be updated to reflect the final choice of sites and the infrastructure these sites require to be acceptable in planning terms.

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				7.0.12 of the same report says " the County Council judges that there will be a transport funding gap, as has been consistently identified in the previous version of the WFIDP back in September 2012 and in the IDPs of other Districts in Worcestershire." Save £17.5m.	
	LPP03528	12.3 Infrastructure	Object	Hospital: With the planned expansion of Kidderminster I feel very strongly that hospital services needs to be at the forefront in terms of a hospital with A&E and more services. Reinstating a proper hospital will relieve the current pressure on Worcester and Russell’s Hall hospitals especially given these areas are also massively expanding. Could part of Lea Castle be ring fenced and considered for a hospital should the current hospital site not be considered big enough?	Worcestershire ACUTE NHS trust has been consulted as part of this planning consultation. Any future infrastructure needs for the hospitals will be identified by them as the provider. Policy 12 enables future infrastructure needs to be met. No change required.
	LPP03552	Paragraph 12.3	Object	<p>Hagley suffer from daily transient traffic as part of both travel to work between Worcestershire, Birmingham and the Black Country and social and leisure destinations. This is shown with queuing traffic regularly as far back as Hackman's Gate and Blakedown, with further queues experienced in Churchill. Adding further development on the source routes will add significant pressure on an already over stretched, under capacity major road intersection.</p> <p>It makes perfect sense therefore that a link road MUST now be created to link up with the traffic Island at Fairfield which in turn gives ease of access to junction 4 at Bromsgrove.</p> <p>Further logic says that the link road should commence</p>	Policy 12 does not preclude works to this area. Any improvements required will be identified by transport modelling being undertaken by the highways authority Worcestershire County Council. No change to policy 12 required.

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				<p>BEFORE Blakedown to relieve it too of transient traffic.</p> <p>I have been in touch with members of Blakedown Parish Council and they too are supportive of the need to take measures to alleviate transient traffic along its part of the A456</p> <p>The rail link between Worcester (and other destinations which it serves) is under utilised and restricted by either pay to park or very limited parking facilities.</p> <p>Car parking should be free at all stations with greater capacity needed at both Kidderminster and Blakedown stations.</p>	
	LPPO4484	12.3 - WFIDP	Comment	<p>The WFIDP as is the Local Plan is very light on the provision of medical services vis:</p> <p>“Secondly, as part of more general advice across Worcestershire, the projected population growth across the County will inevitably lead to increased demand for healthcare, including acute hospital services. Whilst more intensive use of facilities can absorb some increased demand, this is inevitably principally at the margins and the healthcare sector might have to look to CIL (in addition to potentially planning obligations for specific large scale developments) to support the provision of additional health provision, wherever major housing developments are undertaken. This is particularly important for secondary acute healthcare facilities, such as those provided by the</p>	Existing infrastructure deficiencies are the responsibility on the appropriate infrastructure provider. This policy will allow infrastructure to be brought forward to support the proposed growth within this local plan. No policy change required.

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				<p>Trust, for which planning obligation funding is less frequently allocated than for primary care facilities, such as clinics and surgeries provided within large new developments.”</p> <p>The Wyre Forest Infrastructure Development Plan identifies additional Policing costs for Option A. It is recommended the expanded Lea Castle site within Option B is transferred to Option A. The WFIDP and the Local Plan are very light on the provision of medical services. Large Urban estates have evidenced increased anti social behaviour and increased crime rates and this appears to be acknowledged in the WFIDP but is not covered in the Local Plan consultation.</p> <p>Having lived in Kidderminster 19 years I have seen it change for the worse and would welcome development if I thought it would genuinely benefit the local community but existing infrastructure; hospitals, doctors surgeries, schools, Dentists, local support in the community social care etc is woefully inadequate now and to add further burden to an already struggling local system is foolhardy at best. It brings to mind the disaster with the parking issues at the newly built leisure centre. Who would have thought consolidating 3 swimming pools into a single centre would have such a huge demand? Remarkable when you think about it and no way to address it after the fact as permission is already in place on the surrounding land.</p>	
	LPP04491	Infrastructure Health	Object	As Worcestershire NHS is in special measures NO big housing development should be considered in Wyre Forest	This request is not within the power of the district council. The

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				<p>area until medical provisions for this area are secured. Building houses without a thought to medical provision is irresponsible – No big housing development anywhere in Wyre Forest should be considered until Kidderminster Hospital has an A & E.</p>	<p>local authority is required by central government to produce a local plan. The level of development identified is based on an assessed housing need for the area. Policy 12 is designed to enable future infrastructure needs to be brought forward. No policy change required.</p>
	LPPO3939	12.3 IDP	Object	<p>The IDP clearly states that additional policing costs would be incurred for Option A. Option B does not require the same level of roadwork and section 7.0.12 states ‘the County Council judges that there will be a transport funding gap, as has been consistently identified in the previous version of the WFIDP back in 2012 and in the IDPs of other districts in Worcestershire’. This will save the Council £17.5m as stated in the report.</p> <p>If Option A becomes the preferred option, I suggest the expanded Lea Castle site within Option B, be transferred to Option A. This is recommended in the WFIDP in section 3:</p> <p>‘It should be noted that the expanded Lea Castle site within Option B is preferable to the smaller allocation identified in Option A. This expanded site has the potential to include additional development opportunities such as retail and a new primary school which will assist in providing a more sustainable development. This expanded site also allow the potential for further access from the site onto</p>	<p>These comments are noted but require no change to policy 12. The WFIDP is a live document and will be updated with the infrastructure required as identified and evidenced by the appropriate infrastructure providers.</p>

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				<p>A451. However, it should be noted that the A451 is a fast road that has historically suffered from a high accident rate so care would be needed to be taken when considering any access'</p> <p>Large urban estates have evidenced increased anti-social behaviour and increased crime rates. This is referenced in the WFIDP but not included in the Draft Local Plan consultation. Allowing disproportionate urban expansion (almost double the size of existing Spennells estate) is not only, not required, but could result in the need for services to counteract any increase in anti-social behaviour or crime rate.</p> <p>The WFIDP as is the Draft Local Plan is relatively neglectful of the need for enhanced medical services, 'Secondly, as part of more general advice across Worcestershire, the projected population growth across the county will lead to increased demand for healthcare, including acute hospital services</p>	
	LPPO4832	12.3	Comment	The Local Plan is light on how medical services will be addressed as a result of the projected population growth.	The requirements for medical infrastructure are identified within the WFIDP. The WFIDP carries live status and will be updated before the next consultation and throughout the lifetime of the plan. No changes to policy 12 required.
	LPPO4918	Infrastructure	Object	The WFIDP as is the Local Plan is very light on the provision	The requirements for medical

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		Plan		<p>of medical services vis:</p> <p>“Secondly, as part of more general advice across Worcestershire, the projected population growth across the County will inevitably lead to increased demand for healthcare, including acute hospital services. Whilst more intensive use of facilities can absorb some increased demand, this is inevitably principally at the margins and the healthcare sector might have to look to CIL (in addition to potentially planning obligations for specific large scale developments) to support the provision of additional health provision, wherever major housing developments are undertaken. This is particularly important for secondary acute healthcare facilities, such as those provided by the Trust, for which planning obligation funding is less frequently allocated than for primary care facilities, such as clinics and surgeries provided within large new developments.”</p> <p>The Wyre Forest Infrastructure Development Plan identifies additional Policing costs for Option A. It is recommended the expanded Lea Castle site within Option B is transferred to Option A. The WFIDP and the Local Plan are very light on the provision of medical services. Large Urban estates have evidenced increased anti social behaviour and increased crime rates and this appears to be acknowledged in the WFIDP but is not covered in the Local Plan consultation.</p> <p>I have seen Kidderminster change for the worse and would welcome development if I thought it would genuinely</p>	<p>infrastructure are identified within the WFIDP. The WFIDP carries live status and will be updated before the next consultation and throughout the lifetime of the plan. No changes to policy 12 required.</p>

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				<p>benefit the local community but existing infrastructure; hospitals, doctors surgeries, schools, Dentists, local support in the community social care etc is woefully inadequate now and to add further burden to an already struggling local system is foolhardy at best. It brings to mind the disaster with the parking issues at the newly built leisure centre. Who would have thought consolidating 3 swimming pools into a single centre would have such a huge demand? Remarkable when you think about it and no way to address it after the fact as permission is already in place on the surrounding land.</p>	
Place Partnership Ltd	LPPO1112	Paragraph 12.3 IDP	Comment	<p>WP, WMP and HWFRS are supportive of the proposal for the IDP to detail the infrastructure required to support the proposals and development sites in the Local Plan. We also welcome the recognition that both the Community Infrastructure Levy (CIL) and Section 106 mechanisms will be required to deliver this.</p> <p>Pleased that the contents of the IDP on pages 60 – 61 reflect the representations that we submitted to the Council on the 05 September 2016 and 05 January 2017.</p> <p>We would like to update the aforementioned representations by enclosing in Appendix 2 details of the most recent Secretary of State and Planning Inspectorate appeal decisions supporting Section 106 contributions for the police service. They confirm that the principle of and methodology used to request such contributions are wholly compliant with the CIL Regulations. They also confirm that</p>	<p>These comments are welcomed and the information provided will be considered in the WFIDP update prior to the next consultation.</p>

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				<p>'infrastructure' is a broad term and includes not just buildings, but equipment and vehicles too, with all types acceptable within the terms of the CIL Regulations.</p> <p>Disappointed to see that the table enclosed in Appendix A of the IDP has not taken into account the aforementioned representations. No reason is given for this. However, please find enclosed in Appendix 3 an update for inclusion in the IDP.</p> <p>Overall, we trust that this response is of assistance to the preparation of the Wyre Forest Local Plan Review, but should there be any queries or further information is needed, please do not hesitate to contact us.</p>	
Worcestershire Primary Care CCG	LPPO1115	Document	Comment	Having read through the relevant sections of the WFIDP and Local Plan Review Preferred Options, we have nothing to add. We would, however, comment that the costings in section 4.2.4 are now out of date, but note that these aren't included in the appendix so assume there will be opportunities to update these as the process progresses.	Further consultation with infrastructure providers will be undertaken to ensure information is kept up to date as befits the live status of the WFIDP.
	LPPO2497	WFIDP	Object	The WFIDP/Local Plan is very light on the provision of medical services.	The requirements for medical infrastructure are identified within the WFIDP. The WFIDP carries live status and will be updated before the next consultation and throughout the lifetime of the plan. No changes to policy 12 required.

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Education & Skills Funding Agency	LPPO1048	12.4	Support	<p>The ESFA welcomes reference within the plan to support the development of appropriate social and community infrastructure as outlined in paragraph 12.4 and the specific commitment to continue investing in education infrastructure. it would be helpful if key national policies relating to the provision of school places are referenced in the Local Plan:-</p> <p>NPPF para.72 - LPAs should take proactive, positive and collaborative approach to provision of new schools ... and give great weight to need to create, expand or alter schools to widen choice in education.</p> <p>ESFA supports principle of safeguarding land for new schools as per para. 72 of NPPF.</p> <p>WFDC should also have regards to 'Planning for Schools Development (2011) DCLG/DfE</p>	<p>Support of existing policy is welcomed reference to specific NPPF paragraphs isn't necessary on every policy as all policies must be NPPF compliant. To do so would increase the plan length considerably and not change the policy wording itself.</p> <p>Worcestershire County Council as a statutory consultant has provided evidence on all school place requirements.</p>
	LPPO3958	Infrastructure	Comment	<p>Extra housing will put pressure on existing public services i.e. hospitals, GP surgeries, schools. Currently Worcester Acute Trust is in special measures and unable to sustain a quality service for the existing population of Wyre Forest. Kidderminster Hospital was downgraded years ago and provides limited services for Wyre Forest residents. Current GP practices in Wyre Forest have implemented telephone consultations rather than face to face consultations due to pressures on capacity which results in an impersonal doctor/patient relationship. Current GP practices would not</p>	<p>All infrastructure requirements are identified and evidenced by the appropriate infrastructure provider for all the themes mentioned in this response. Policy 12 is designed to enable future infrastructure need to be delivered. No change required.</p>

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				<p>be able to accommodate an influx of new patients.</p> <p>Local primary schools are all full and would not be able to cope with the extra children new housing development would bring. Therefore any development should be large enough to warrant extra primary schools, GP surgeries and other community services in order for the development to be sustainable.</p> <p>We would like to propose a solution to the problem with Hurcott Lane being a “rat run”. The junction between A456 and Hurcott Lane is already a black spot for accidents and similar problems exist between the junction of A451 and Hurcott Lane. Any closure of either end of Hurcott Lane would result in traffic diverting through the village and along Hurcott Road which is even narrower than Hurcott Lane. It would also divert traffic from the Birmingham Road along Baldwin Road instead and this road already has an increase in traffic at rush hour with commuters cutting through to access Hurcott Road/Chester Road North.</p> <p>We propose that access is available either end of Hurcott Lane to access Hurcott Woods nature reserve only with bollards preventing through traffic from either end. Hurcott Road should be made a bridal path/cycle path/pedestrian access only to get to Hurcott Woods. Bollards would be required adjacent to the current bridal/public footpath where Hurcott Road narrows on the blind bend. This would make it safer for pedestrians walking their dogs and families with young children as well as encouraging cyclists and</p>	

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				walkers to use this lovely country side for recreational exercise.	
	LPP03903	Paragraph 12.4	Object	The Council has ignored 3 independent analyses that shows that development of Green Belt is unnecessary. I strongly object to this plan.	There is no mention of Green Belt within this paragraph. This policy is designed to allow for infrastructure as required not decide where new development is located. No change required.
	LPP03904	Paragraph 12.5	Object	The Council has ignored 3 independent analyses that shows that development of Green Belt is unnecessary. I strongly object to this plan.	There is no mention of Green Belt within this paragraph. This policy is designed to allow for infrastructure as required not decide where new development is located. No change required.
	LPP03905	Paragraph 12.6	Object	The Council has ignored 3 independent analyses that shows that development of Green Belt is unnecessary. I strongly object to this plan.	There is no mention of Green Belt within this paragraph. This policy is designed to allow for infrastructure as required not decide where new development is located. No change required.
Worcestershire County Council, Planning Economy & Performance	LPP01229	Paragraph 12.6	Comment	The Worcestershire and Greater Birmingham and Solihull LEPs are referred to here as "infrastructure providers". These bodies do not directly provide infrastructure, but rather seek and coordinate funding for others to deliver, so it may not be appropriate to refer to them in these terms.	Agree description of LEP's will be changed.
Wyre Forest Green Party	LPP01482	Local Infrastructure	Comment	6,000 homes by 2034 mean approximately 20,000 new people in Wyre Forest District. How will the Hospital and	All infrastructure providers have been consulted as part of this

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				<p>emergency services cope with this growth? Even halving this number to the number which I believe is realistic requires significant investment.</p> <p>Expanded residential developments requires proper infrastructure to support its current and future residents. We have found no evidence of future funding to support this. In particular:</p> <ul style="list-style-type: none"> • Hospital services <ul style="list-style-type: none"> ○ Kidderminster Hospital was downgraded several years ago and is ill-equipped for an enlarged population. ○ Worcestershire Acute Hospitals NHS is considered to be a failing trust by the CQC. ○ Worcestershire Health and Care NHS Trust have moved or downgraded some mental health services at Kidderminster, with service users and their relatives needing to travel to Redditch. • GP & Dental surgeries – We are not confident that there will be adequate provision of GP and dental services in a greatly enlarged Spennells. • Schools – Existing local schools are nearly full. We are not confident that extra school places will be made available in time for the projected new arrivals to this part of town. Temporary Portacabin classrooms and long travel times for pupils to get to a school with capacity, will lead to poorer educational outcomes. The funding that may be 	<p>process to identify their themes infrastructure requirements. This information is contained within the WFIDP. The delivery of these services is the responsibility of each provider with the responsibility for enabling planning policy falling to WFDC.</p>

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				<p>made available for a new school if the housing development surpasses 1000 homes, is no guarantee that the school will actually be built. Car parking outside many schools is already difficult at the beginning and end of the school day.</p> <ul style="list-style-type: none"> • Local shops, pharmacy and post office – We are not confident that adequate additional local shops will be constructed to serve any enlarged Spennells community and there is no capacity to enlarge the existing shops and car park at Warbler Place. • Local leisure such as a village hall, pub, and fitness centre/gym – We are not confident that adequate local leisure facilities will be built to serve an enlarged estate, leading to a soulless estate with no sense of community and heightened youth alienation. • Local roads and transport – The absence of adequate schools, shops and leisure facilities will increase car journeys which will contribute to local air pollution and traffic congestion. The building of an estate on the fringe of Kidderminster will see more car journeys rather than walking and cycling, compared to development closer to the town centre on brownfield sites. 	
Summerfield Against Land Transformation	LPPO1615	Section 12 - Infrastructure	Comment	Given the scale of the proposed development thought must be given to key educational and health services to support the residents of the new housing stock. This will require an expansion of existing schools and the creation of a new	National planning policy dictates how local plans are developed with public participation stages and elected members voting

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				<p>health centre/GP practice. This is true of both options, but especially Option A, given the density of housing envisaged.</p> <p>We accept and support the need for infrastructure development to reflect the ambition of a Local Plan. However, we see this draft Plan being cynically manipulated — via Option A — to justify the relief road, resolve pre-existing problems and to attract capital funding.</p>	elements of the plan. This ensures the process of plan development is democratic and fair. The support for additional infrastructure is welcomed. No policy change required.
	LPPO2323	Option A - Spennells	Object	<ul style="list-style-type: none"> • Have schools/hospitals etc. been considered? • How will Kidderminster/Worcester hospitals cope when they are already in special measures and struggling? • It will put pressure onto the education system in Wyre Forest. 	
Network Rail	LPPO1141	Transport & Accessibility	Comment	<p>Network Rail owns, maintains, renews and enhances the railway infrastructure in England, Wales and Scotland and is a statutory consultee for:</p> <p>(a) Any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and</p> <p>(b) For any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order); in addition you are required to consult the Office of Rail and Road (ORR).</p>	These comments are welcomed and will be considered in the transport section of the WFIDP and transport policy 13.

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				<p><i>The Town and Country Planning (Development Management Procedure) (England) Order 2015 SCHEDULE 4 Consultations before the grant of permission Development which is likely to result in a material increase in the volume or material change in the character of traffic using a level crossing over a railway.</i></p> <p><i>The operator of the network which includes or consists of the railway in question, and the Secretary of State for Transport.</i></p> <p>Traffic over a level crossing can be vehicular, pedestrian, cyclists or horse-riders and that proposals do not have to be adjacent to a level crossing to potentially impact the crossing. The council should also be made aware that several proposals over time can also have a cumulative impact upon a level crossing or level crossings in the area, and here, developer contributions could be pooled from several developments to fund mitigation measures.</p>	
Rushock Parish Council	LPPO1106	Infrastructure	Comment	<p>We are concerned about the effects of the proposed residential developments on already overcrowded roads, medical services, social services and schools in the district. Developments of this size will very likely encourage commuters to Birmingham and elsewhere which will generate major traffic problems.</p>	<p>All infrastructure requirements are identified and evidenced by the appropriate infrastructure provider for all the themes mentioned in this response. Policy 12 is designed to enable future infrastructure need to be delivered.</p>
	LPPO4730	Section 12	Comment	<p>It is good to see in this section (Policy 12) reference to the Strategic Infrastructure required for these large developments. It should however be made extremely clear in any future document that no land will finally be released</p>	<p>Development location is not relevant to policy 12 which is designed to enable future infrastructure needs to be met.</p>

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				<p>from Green Belt or ADR until the council and developers have costed and have funding in place for any infrastructure required.</p> <p>No other comment on this section as I don't know anything about the WFIDP or what this 'living' document proposes but see previous comments on health and the requirement in the proposals for new schools. Where is the money to pay for this coming from and what is Plan B when there is no money available? Is 12.7 extra tax or local rates?</p>	No policy change required.
	LPPO4782	Section 12	Comment	<p>A cautionary tale from our neighbours in Bromsgrove. They had been offered a 'useful' contribution' from Birmingham (presumably not unlike the finance that WFDC are looking forward to receiving for the station, and apparently, the southern bypass).</p> <p>Birmingham has the largest housing department in England and due to its financial muscle and much larger finance legal departments is at a great advantage in discussions with its County neighbours.</p>	This comment has no impact on current policy development. Cross Boundary issues are identified through the appropriate mechanism.

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	LPPO622	Transport	Comment	Need better reliable bus services and links from Bewdley to Kidderminster Station.	Comments noted. Almost all bus services in Worcestershire are now provided on a commercial basis, without any intervention from the County Council. Your comments will be passed to the local commercial bus operator, Diamond, for their consideration.
Highways England	LPPO790	Policy 13	Comment	<p>Highways England ('we') are responsible for the operation and maintenance of the Strategic Road Network (SRN) in England. The network includes all major motorways and trunk roads. Wyre Forest District lies in close proximity to the M5, which is located approximately 6 miles to the east of the district.</p> <p>Highways England has undertaken a preliminary review in order to consider the potential traffic implications associated with the allocated housing, employment and retail development as set out in Options A and B of the consultation version of the Wyre Forest Local Plan. We have identified that the level of traffic generated from the allocated sites within both options is similar and we do not have specific preference as to which option is brought forward. We note however that there may be material implication for our network at M5 Junctions 3, 4 and 6 arising from increased levels of traffic</p>	Comments noted. As with all Local Development Plan reviews, Worcestershire County Council will continue to work closely with Highways England, using available data and information to monitor and manage the forecast impacts of planned development growth, and pursue mitigation measures as and when appropriate.

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				<p>associated with development in Wyre Forest.</p> <p>In order to develop a clearer understanding of the implications of the proposed allocation of development for the SRN, more detailed traffic assessment of M5 Junction 4 is a priority. This junction is already affected by development arising from the plans of Bromsgrove District and Birmingham City Councils. The implications of development traffic at M5 Junction 3 are likely to be affected by traffic growth associated with plans and strategies of Bromsgrove District Council, the Black Country Authorities and Transport for West Midlands.</p> <p>Highways England will seek to work in partnership with you and Worcestershire County Council as the Local Highway Authority to consider these implications and identify if any mitigation measures are required to support the identified growth in Wyre Forest District.</p> <p>Highways England will therefore seek to encourage on-going engagement with Wyre Forest District Council and Worcestershire County Council during and after the public Local Plan consultation in order to identify any necessary highway improvement schemes to ensure the SRN continues to operate its primary role as a strategic route for</p>	

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				through traffic.	
Bewdley Civic Society	LPP0891	Policy 13	Comment	<p>Additional Suggestions and Omissions:</p> <p>A policy to improve Bewdley's parking regime, especially that on the Wribbenhall side. Suggest a scheme to use the Bewdley Rowing Club's car park thereby enabling a financial incentive to improve the Club's fortunes and property and help the town with its parking problems.</p>	Comments noted. Worcestershire County Council is very supportive of exploring this option further, which has the potential to significantly improve access to Bewdley; boosting the local economy.
Chaddesley Corbett Parish Council	LPP01042	Policy 13	Comment	<p>Freight proposals - need to be aware of incremental developments and impact of increased freight movements over time.</p> <p>Support need to improve direct rail services to London/Bristol and increase speed of services to Birmingham/Bristol.</p> <p>More parking at Blakedown will not help with use of direct rail services from Kidderminster. More parking is needed at Kidderminster itself. Need to assess road improvements required for new Worcester Parkway station.</p>	Comments noted. The proposal to improve parking at Blakedown Station (LTP4 Scheme WFST5) is to improve access to rail for residents of the Wyre Forest, for who Blakedown would be the nearest rail station, such as residents of Chaddesley Corbett, for example. The business case for Worcestershire Parkway included an extensive assessment of road based trip generation. A number of access improvements are being pursued to support access to the new station by a variety of transport modes, once it opens to the public.
Network Rail	LPP01147	Policy 13(B), Paras. 13.21 and 13.23	Comment	There are level crossings at Blakedown Railway Station and Hartlebury Railway Station. Increased pedestrians and vehicle usage at the level crossing	Comments noted. Any investment in rail infrastructure will be developed in full compliance with Guidance for

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				<p>could increase the risk scores at both level crossings. There could also be an increase in trespass. It is key for any increase in passengers that both stations have adequate parking facilities, which at present both do not have. Blakedown in particular is a problem as parked cars on the approach roads hinder sighting and visibility of the level crossing; Network Rail would not want this scenario to be repeated at Hartlebury. In addition, both stations do not have access over the railway other than at the road level crossings.</p> <p>There are also a number of footpath level crossings in the area too (Blakedown Viaduct, Harborough Hill, Lambs Farm). Closure of these should form part of the criteria for bringing any sites forward for development in the immediate area. The stopping up of the level crossings should be promoted under S257 of the Planning Act given the nature / amount of usage that would arise as a result of the proposed large developments. Closure under s257 would be led by the developer(s) who would fully fund the process and any mitigation measures.</p> <p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none"> • By a proposal being directly next to a level crossing • By the cumulative effect of developments 	<p>Rail Investment Projects, which requires consideration of all of the concerns raised, and will result in a net betterment of rail infrastructure, to reduce the risk of accidents. The prevalence of at-grade level crossings on the Stourbridge Line is unsurprising, given the evolved nature of this route. Worcestershire County Council will continue to work with Network Rail, Train Operating Companies, Wyre Forest District Council and other partners to take advantage of opportunities to close any at-grade level crossings and replace these with grade separated, safer alternatives, where funding and resources can be identified.</p>

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				<p>added over time in the vicinity of a level crossing</p> <ul style="list-style-type: none"> • By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route • By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the level / type of use of a level crossing increases as a result of diverted traffic or of a new highway • By developments that might impede pedestrians ability to hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads • By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs • By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing • By any proposal that may cause blocking back across the level crossing • By any proposal which may see a level crossing impacted by the introduction of cycling or walking routes <p>Developments within the council area should be</p>	

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				<p>accompanied by a TS/TA which includes consideration of the impact of proposals upon level crossings with mitigation implemented as required. We would encourage the Council to adopt specific policy wording to ensure that the impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and suitable mitigation incorporated within the development proposals and funded by the developer(s). TS/TAs should be undertaken in conjunction with the local highways authority with advice from Network Rail.</p> <p>Future development proposals should also take into account the increases in pedestrian and vehicular traffic and developer contributions (either via CIL or S106) used to provide bridges for passengers to cross the railway when road barriers are down.</p> <p>The Preferred Options document includes enhancements proposed for Hartlebury Railway Station and Blakedown Railway Station (including proposals for increased vehicle parking), both of which have level crossings. Should development proposals in the Blakedown / Hartlebury areas impact upon the level crossings then any mitigation measures must be fully funded by developer contributions (CIL, S106).</p> <p>Proposals for enhancements at Blakedown and Hartlebury stations will need to be agreed with Network Rail and London Midland and must not</p>	

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				increase the risk at the respective level crossings.	
Network Rail	LPP01148	Policy 13(I & K) and Paras. 13.16 and 13.17	Comment	<p>Transport Assessment’s review local needs regarding public transport. This usually focuses on buses, however, they should also take into account impact upon footfall at railway stations. Developers are encouraged to consider including within Transport Assessments trip generation data at railway stations (Blakedown, Kidderminster, Hartlebury etc). Location of the proposal, accessibility and density of the development should be considered in relation to the relevant railway station in the area.</p> <p>Where proposals are likely to increase footfall at railway stations the Local Planning Authority should consider a developer contribution (either via CIL, S106 or unilateral undertaking) to provide funding for enhancements as stations as a result of increased numbers of customers.</p>	Comments Noted. Worcestershire County Council and partners fully understand and embrace the potential of rail to provide much-needed travel choice in Worcestershire. The preparation of the Worcestershire Rail Investment Strategy, and significant technical work to identify and develop investment schemes which has been undertaken to date will be used to lever in funding from a variety of sources, including Developers and the rail industry, to enhance the quality of facilities at rail stations to meet increased demand over time.
Worcestershire County Council, Planning Economy & Performance	LPP01230	Policy 13	Comment	<p>Part C could also refer to Worcestershire's Parking Standards referenced above. Part F appears to be closer to background information than policy. Need to amalgamate with part G. The acronym "SWAT" should be explained. Question the value of the final bullet point in part F.</p> <p>This policy is noted and supported. However, WCC note that the transport modelling for WFDC local plan has not been undertaken, and it is proposed that this exercise is undertaken once an agreed</p>	Comments are noted and welcomed. WFDC will continue to work with WCC to further refine Policy 13 as the Plan progresses.

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				<p>development option has been decided upon. The outputs of the modelling will be used to inform the transport schemes in the local plan and in policy 13F.</p> <p>The transport modelling will also consider the impacts of the proposals on strategic routes outside of WFDC and options / proposals for enhancements or alternative provision. The modelling work will require a period of 6 months to complete once we have received a single set of sites. The modelling may identify schemes required outside of the Wyre Forest district boundary. We understand schemes outside of the district cannot be allocated into the WFDC local plan; these will be included and referenced in the infrastructure delivery plan and in policy as required. We welcome the opportunity to work further with WFDC on this policy and the transport and accessibility proposals as the plan develops and to take forward the transport and infrastructure policies once a development option has been confirmed and further evidence-based modelling has been completed.</p>	
Campaign to Protect Rural England	LPP0939	Policy 13F	Comment	<p>Park and Ride: need to provide substantial amounts of parking at Kidderminster and Blakedown stations. No capacity for expansion further along line into Birmingham. Parking should be free.</p> <p>Swat 10: a rail connection from Stourport to</p>	Comments noted. Worcestershire County Council agrees with the suggestion to boost park and ride facilities at local rail stations, and is committed to pursuing this with partner organisations. With

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				Hartlebury might be desirable but would not be economic as no through traffic is possible.	reference to LTP4 Scheme SWAT10, there is no intention to re-open the railway between Stourport and Hartlebury. Instead, is intended to upgrade this as a high quality active travel (walking and cycling route) to provide a direct link between Hartlebury Station and Stourport. Given the relatively short distances, it should be possible to cycle between Stourport and Hartlebury Station in under 15 minutes, which would be highly attractive and offer significantly improved access to rail for residents of Stourport, at low cost.
Canal & River Trust	LPPO1013	Policy 13	Comment	Policy states that priority will be given to improving infrastructure to support active travel (walking and cycling). Canal towpath is important route for both utility and leisure uses and improvements should be included as infrastructure needs to be delivered to encourage greater use.	Comments noted and agreed.
Historic England	LPPO1277	Policy 13	Comment	Policy 13 sets out some transport initiatives that have also been set out in the Local Transport Plan. Have these been subject to assessment on the impact for the historic environment? If so, how are the issues and opportunities that were raised being incorporated into the Local Plan? Specifically	Comments noted. The LTP4 does not contain proposals for any new road schemes in the Wyre Forest at the present time. Where schemes are identified and brought forward for delivery, consideration of potential

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				undesigned archaeology can be an issue when developing new road schemes.	impact on the historic environment is fully embedded within our scheme development processes.
Wyre Forest Friends of the Earth	LPP01317	Policy 13	Comment	<p>Do travel plans apply to housing as well as commercial developments?</p> <p>An effective way to make the roads more attractive to non-motorised users is the imposition of a 20mph speed limit in residential areas. Reducing the speed of motorised traffic makes it safer and less intimidating for residents to undertake short journeys on foot or bike and hence reduces the need for car use.</p>	Policy 13 states that 'Transport Plans will be required for all major development' - this will include major housing developments.
Taylor Wimpey West Midlands	LPP01537	Policy 13	Comment	Generally supported, however, it fails to recognise the Kidderminster Eastern Relief Road as a benefit for transportation in the town and the wider District. Given the comments above relating to the development strategy, it is proposed that the Relief Road scheme can be delivered in its entirety over the longer term, however, should be properly planned for now. The policy should be updated accordingly.	Comments noted.
Persimmon Homes Limited	LPP01561	Policy 13	Comment	Purpose of this policy to encourage new developments to adopt more sustainable transport solutions than currently exist and address known issues related to the highways network.	Comments noted.
Wyre Forest	LPP01409	Policy 13	Comment	Do travel plans apply to housing as well as	Policy 13 states that 'Transport Plans

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Green Party				commercial developments? (B)“Travel Plans will be required for all major developments. These must set out measures to reduce demand to travel by private cars and must seek to promote and support increased walking, cycling and public transport use for a range of trip purposes through agreed targets and monitoring arrangements”. An effective way to make the roads more attractive to non-motorised users is the imposition of a 20mph speed limit in residential areas. Reducing the speed of motorised traffic makes it safer and less intimidating for residents to undertake short journeys on foot or bike and hence reduces the need for car use.	will be required for all major development’ - this will include major housing developments.
	LPPO2781	Policy 13	Comment	<p>Improve access to Kidderminster town centre by establishing park and ride facilities and thereby improving air quality by reducing traffic volumes and toxic congestion.</p> <p>Accepting the probability that economic growth within the Wyre Forest will not be sufficient to sustain both the current and future demand for local employment there is and will be a need for workers to seek jobs outside the area. Encouraging them to use buses and trains rather than cars to travel to work would help to relieve the toxic congestion on the roads but the proposed transport infrastructure does little to address this objective. In fact the plan, because the parking facilities at Kidderminster</p>	Comments noted.

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				<p>Station cannot be extended, offers only a negative solution by suggesting that people drive their cars to Blakedown to connect with the train services emanating from there! Such a proposal highlights yet another flaw in the logic underpinning this Plan. If Blakedown has the capacity to handle an expansion of train usage why is no consideration made to use Blakedown for potential residential expansion. It has good links to Bromsgrove/Worcester by road and Stourbridge/Kidderminster and Birmingham by rail.</p>	
	<p>LPPO3427</p>	<p>Facilities</p>	<p>Comment</p>	<p>Monies spent on revamping the train station are a waste of time. The station although unattractive, is perfectly serviceable. London Midland is closing down ticket offices. What the station needs is FREE car parking. This would reduce impact on residents such as I who regularly have train commuters parking up and down the rear of my property (sometimes blocking my car on my drive) or the incessant football supporters parking up Chester Rd South on both sides of that busy A road. Another problem the Council seem happy to ignore.</p>	<p>Comments noted. Worcestershire County Council fundamentally disagrees with the view that investment in Kidderminster Station is a waste of time. The station is in a poor state of repair and the quality of facilities is wholly inadequate to support growth. It is for this reason that a number of funding bodies have released funding to enable Worcestershire County Council to pursue this major scheme to rebuild Kidderminster Station. Your comments on free car parking are noted, however, this is not within the County Council's control. Car parking charges are used by Train Operating Companies to cover the costs of</p>

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					operating and maintaining car parks, which are surprisingly high. As a result, it is very unlikely that free car parking will be provided at Kidderminster Station, unless this was part of a Government funded initiative.
Ramblers Association	LPP04136	Policy 13	Comment	<p>Ramblers is particularly pleased to see the emphasis on provision for cyclists and walkers contained in this policy. Sadly, we fear that these fine sentiments will not be followed through in implementation without a considerable change of mind on behalf of the councillors and officers involved.</p> <p>Paragraph B of the policy deals with Travel Plans and we would like to see these documents considering the public rights of way network and how it could be improved to facilitate journeys to work, shops, community facilities and education establishments. This should be followed up with obligations or CIL contributions to achieve improvements. We think Paragraphs 13, 32 to 13.34 which deal with active travel modes should be amended to reflect this aspiration.</p>	<p>Comments noted. Worcestershire County Council's ambition to pursue increased investment in active travel modes is set out in the Worcestershire Local Transport Plan LTP4, which can be downloaded here: www.worcestershire.gov.uk/LTP. Please rest assured that there is strong desire to invest in these modes; the challenge is a lack of funding, as a result of prolonged Government austerity, and an unfunded national Cycling and Walking Investment Strategy, sadly. Worcestershire County Council continues to lobby Government with partner authorities for funding to be specifically allocated to support development of infrastructure and services to support active travel modes, as evidence proves that this is</p>

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					sorely needed to tackle congestion and enable sustainable economic and development growth.
	LPP04468	Congestion and alternatives	Comment	<p>Churchill & Blakedown Neighbourhood Plan identifies Traffic and Transport as a major issue/problem.</p> <p>A456 through Hagley already suffers severe congestion up to the A491.</p> <p>Concern at increased use of Blakedown Railway Station without infrastructure improvements – parking already a problem and junction improvements required to A456/Station Road as well as pedestrian safety, e.g. additional crossing required.</p> <p>Even the proposed Eastern Relief Road will not assist – it will simply funnel more traffic onto the A456.</p> <p>Support increased parking provision at Kidderminster Station – why not build a multi storey car park?</p>	<p>Comments noted. Worcestershire County Council is well aware of the capacity constraints on the A456, and is working with partner Local and Regional Transport Authorities to make the case for strategic investment in this regionally important transport corridor. LTP4 includes Scheme WFST5, which proposes a major scheme to invest in Blakedown Railway Station, to significantly improve the quality of services and facilities provided there. At this stage, until the quantum and location of planned development is clarified within this plan, it is not yet possible to state what facilitative transport infrastructure will be required to enable and support this growth. Worcestershire County Council will work with Wyre Forest District Council to assess the likely transport impacts of planned growth and identify required investment in</p>

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					<p>transport infrastructure and services to mitigate this.</p> <p>The case for a multi-storey car park at Kidderminster will be explored, however, given the exceptionally high cost of this proposal, and the need for the local highway network to provide suitable access to accommodate increased vehicular trips that an expanded car park would generate, this is unlikely to be delivered in the short to medium term (5-10 years).</p>
	LPPO5098	Policy 13	Comment	Policy 13 on Public Transport needs to recognise the appalling bus services which we have at the moment and I feel that we should go back to municipally owned, supported and operated bus services. In an ideal world, the three towns could be connected by a tram system.	Neither Wyre Forest District Council nor Worcestershire County Council have much in the way of control in the provision of local bus networks, as these are now predominantly provided commercially. There remains a strong desire to see investment in local bus networks, but this will require Government funding to support such an initiative, as local funding is now scarce as a result of prolonged austerity.
	LPPO374	Policy 13	Object	Any development as far out as Far Forest negates all the measures to promote efficient use of transport,	Comments are noted. However, there is a local housing need in Far Forest

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				and walking and cycling, because it will just create commuter miles in private cars while travelling to work in the major towns and West Midlands.	which we are trying to meet with a small amount of housing.
	LPPO3617	Policy 13	Object	<p>If we take a look at public transport in the Kidderminster area it is by the by not too bad. Sadly the lack of parking for public transport is shocking. I would like to draw attention to the parking at Kidderminster rail station. Although there has been funds found to upgrade the station, during a pop up event to promote this, one question was constantly asked. “Are there going to be more car park spaces?” To which the reply was always “No”. Surely this needs to be looked into again as the Local Plan states there are going to be more housing so why can’t proper facilities be provided for ever expanding rail travel.</p> <p>Currently if you want to travel on the train and drive to the station, if you’re not there before 9.30 then there are no available places for you to park. A lot of commuters currently Park on the Severn Valley Railway car park as this is cheaper by day and sometimes the only available option. What’s going to happen when all these spaces are used and no more parking is available? Also currently people are travelling from the Kidderminster area to Stourbridge Junction station and using their facilities. Reason being as parking is free. The problem being that</p>	<p>Objection and comments noted. The ability to expand Kidderminster Station Car Park is limited by available space. The case for a multi-storey car park at Kidderminster will be explored, however, given the exceptionally high cost of this proposal, and the need for the local highway network to provide suitable access to accommodate increased vehicular trips that an expanded car park would generate, this is unlikely to be delivered in the short to medium term (5-10 years). The reality is that, contrary to public expectation, car parking is very expensive to provide. Train Operating Companies charge for car parking, because this ensures that at least some of the costs of providing car parking are borne by drivers using it, rather than those who access the station by other means. In recognition of this, it is critically important that investment is now</p>

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				<p>Stourbridge junction rail station also suffers from lack of or non-existent car parking spaces after 9.30. I feel that before too much money is spent on Kidderminster rail station the one major problem should be clearly looked into. Lack of parking spaces!</p> <p>On occasions when I can get the train to work; I still end up having to drive into Birmingham due to the lack of parking spaces. How can this be environmentally friendly? Also on many occasions during time off I have wanted to go into Birmingham or Worcester to do some shopping. Once again I have had to drive to these destinations due to lack of parking spaces at Kidderminster. Regarding trips to Birmingham, I had tried spaces at Kidderminster, Blakedown, Stourbridge Junction and Cradley Heath before giving up and driving into the city.</p> <p>How can rail transport be promoted with the expanded population as promoted in the WFDC Local Plan if a simple service like parking spaces can't be provided?</p> <p>Where are all the extra cars going to park with all the extra houses that are going to be built?</p> <p>The expansion of Kidderminster rail station is a bit shambolic and again needs looking into. Not just to promote the use of rail transport, but as an</p>	<p>prioritised to ensure that those that live locally to the station (i.e. within Kidderminster) have the option available to access the station without a car; either on foot, by bike, on bus or by taxi for example. The expansion of Kidderminster Rail Station has not yet commenced, so it is perhaps premature to suggest it is shambolic?</p>

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				environmental issue to take all these extra cars that are going to clog up Kidderminster roads off them and people onto the rail network!	
	LPPO285	Policy 13 (F)	Support	I support the proposed 'Dowles Link' WFST3 to connect Bewdley with the Wyre Forest. Access to the Forest is currently difficult and dangerous by foot or cycle, and almost impossible for those with mobility impairment, unless using a car. A safe and fully accessible link would not only enable people to enjoy the beauties of the Forest without resorting to a vehicle, but encourage a healthier lifestyle. This would fit in well with other aspirations of the Local Plan, to reduce obesity and encourage people to walk and cycle more. It would also help meet the need to provide equal opportunities for those with mobility and/or other impairments. A recent Feasibility Study has shown the viability of this proposal and it would be good to see this being taken forward in the near future. It would without doubt also provide economic benefits as it would attract people to Bewdley who would otherwise need to use their cars to access the attractions of the Wyre Forest.	Support and comments noted.
Bewdley Civic Society	LPPO855	Policy 13	Support	Support proposals to improve the poor links of Bewdley with/to the Kidderminster Rail station. Support any improvement of links especially pedestrian, between the SVR and Bewdley.	Support is noted.

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West Midland Safari Park	LPP01328	Policy 13	Support	We support section D of Policy 13 which will give priority to improving infrastructure, technology and services to support active travel (walking and cycling) and passenger transport (bus, rail and community transport) during the plan period.	Support is noted.
	LPP03907	Paragraph 13.1	Object	The statement is at odds with the proposal to increase urbanisation of the green field reducing quality of life and increasing pressure on the infrastructure inc health services and the local economy. I strongly object to the council's proposals.	Objection is noted.
	LPP0458	13.2	Comment	<p>The Horsefair is an Air Quality Management Area. There will be an increase in traffic from the development at the rear of Baldwin Road OC/4. The increased amount of traffic would use Hurcott Road and the Horsefair to access the town centre and outlying shopping complexes.</p> <p>Roads around Hurcott Road would be used as rat runs.</p> <p>Baldwin Road is already a rat run that is used to avoid the Land Oak traffic lights. The A456 is gridlocked at times - during the rush hour, weekend and holiday traffic to West Midlands Safari Park. The increase in traffic would add to this congestion and would have an impact on air quality.</p> <p>Hurcott Lane is also used as a rat run and the access</p>	Comments are noted. Transport modelling is being undertaken as part of the next stage of plan-making. This work will help to inform the final site selection for the emerging Local Plan and what mitigation measures would need to be put in place.

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				to the A456 is dangerous without having an increase in traffic	
	LPP0602	13.2	Comment	Any development which would increase traffic in the AQM areas should be resisted.	Comment is noted.
Bewdley Civic Society	LPP0856	13.2	Object	<p>Object to any proposal that exacerbates the air quality issues in Welch Gate.</p> <p>Concern with the further development of tourist facilities in the area and the enhanced role of WMSP, SVR, Wyre Forest, Bewdley etc. unless there is a proper and coordinated plan of traffic flow improvements. Without improvements, traffic through Kidderminster will bottleneck and destroy the tourism trade.</p>	<p>Objection and comments noted. It is critically important to understand that providing additional highway capacity will not resolve this issue, because the Wyre Forest is subject to significant latent demand. This means that any additional capacity provided would rapidly fill with traffic, leading to a net overall deterioration in traffic conditions. Recognising this, Worcestershire County Council, in partnership with a range of partner organisations, is focussed on providing enhanced travel choices, particularly rail, walking and cycling to reduce the need to travel and spread demand. This will improve access for all and tackle congestion in the Wyre Forest affordably and sustainably, supporting the long term socio-economic prosperity of the District.</p>
	LPP04554	13.3	Comment	It is noted that attention is drawn in this paragraph to	Comments are noted.

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				congestion in two areas, the A448 between Kidderminster and Bromsgrove and the A456 near the West Midlands Safari Park. In the case of the A448 between Kidderminster and Stone it is difficult to see how providing access for an additional 2600 new homes (potentially upwards of 4000 additional vehicles per day) proposed by Option A to this road is going to do anything other than significantly exacerbate the current congestion and pollution issues. Those of us who live near the A448 already suffer with significant noise and pollution from this road.	
	LPPO4618	13.3	Comment	In relation to infrastructure and traffic levels, the plan states that the West Midlands Safari Park suffers from high levels of traffic in the summer months, when visitor numbers are highest, WFDC has already approved the development of a water park at the Safari Park, on Green Belt, that will add to this traffic without providing adequate mitigation.	Comments are noted. Transport modelling is being undertaken as part of the next stage of plan-making. This will test the road network and inform the final selection of sites.
	LPPO3909	Paragraph 13.3	Object	The ring road is vital asset to support the movement of goods/services around Kidderminster. I object to the plans for further development.	Objection is noted.
Historic England	LPPO1278	Para 13.4	Comment	Paragraph 13.4 discusses the constraint of the narrow historic street pattern in Bewdley, are there any proposals to overcome this? We would be cautious of any approach that could impact the historic street pattern in Bewdley.	Comment on paragraph 13.4 noted. The historic street pattern of central Bewdley lined by listed buildings restricts physical improvements to

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					<p>the existing road layout.</p> <p>Any revision to the existing traffic management measures is the responsibility of the Highways Authority (in this case Worcestershire County Council).</p> <p>There are no plans to make any changes to Bewdley's narrow historic street pattern. This recognises that much of the town centre is protected by Conservation Area designation.</p>
Canal & River Trust	LPPO1015	para.13.9	Comment	The Trust would in principle support the use of the canal to carry freight though this would largely depend on the extent required and maintenance implications for the waterway. If this option is pursued further discussions would be needed.	Comments are noted and paragraph 13.9 will be amended to remove reference to the movement of freight along the waterways.
North Worcestershire Water Management	LPPO903	13.9	Comment	<p>It is stated that “The District's inland waterway network including the Staffordshire & Worcestershire Canal and the Rivers Severn and Stour also offer longer term opportunities for the sustainable movement of freight through the District.”</p> <p>The Stour has to my knowledge never been navigable, with the exception of a short section that could be accessed from the canal at Pratt’s Wharf – see</p>	Comments are noted and paragraph 13.9 will be amended to remove reference to the movement of freight along the waterways.

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				<p>https://en.wikipedia.org/wiki/River_Stour,_Worcestershire Navigation on the River Severn above Stourport stopped by 1900. Canoes and other small craft regularly use the entire length of the river from the Welsh border, but larger craft are currently at the mercy of highly variable water levels and no controlling authority upstream of the Gladder Brook confluence at Stourport.</p> <p>To make the River Stour and Severn navigable to the point that this would form reliable freight routes would inevitably require huge and ongoing investment that surely renders this non-viable?</p>	
	LPPO359	Paragraph 13.10, bullet point 2	Support	Integration of bus and rail (and the improvement of rural bus services) are key.	Support is noted.
	LPPO4478	13.11	Object	<p>The road network in Spennells is already congested. In Heronswood road, Captains Pool, and Spennells Valley road junctions.</p> <p>In addition many people use Spennells valley road as a rat run through.</p> <p>Additional traffic will increase risk of injury to children accessing the primary and secondary schools, cause pollution and add to health concerns.</p>	Objection is noted.
	LPPO3910	Paragraph	Object	The District does not have good rail connections to	Objection is noted.

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		13.11		Birmingham.	
	LPP04259	13.12	Comment	<p>With three caravan sites between the top of New Road and the bottom of Sugars Lane, the amount of traffic up and down is horrendous.</p> <p>The school traffic is a nightmare, New Road becomes very congested.</p>	Comments are noted.
	LPP03094	13.12 Traffic/Roads	Comment	<p>My concern is with the roads around any new development. We need to avoid creating more & more congestion around Kidderminster.</p> <p>The Sugar Beet development is very good with improved access at both ends – Hoo Brook and the Stourport Road.</p> <p>But the development on Waterside and surroundings has built a load of houses, but only one way in or out – into the Horsefair. There should be another access road, say onto Crossley Park.</p> <p>Let’s improve Hurcott Lane – wider, and better junctions onto the B’ham Road A 456 & the Stourbridge Road A 451.</p> <p>At the Stourbridge Road end A451 this road could carry on down to the Wolverley cross roads on the</p>	Comments noted. It is widely recognised that there is direct link between development growth and traffic growth. Improving roads and junctions (by increasing their capacities) is not the answer, because this simply encourages more people to drive, and so congestion becomes worse. In order to tackle congestion, it is necessary to focus investment on providing increased travel choice, and reducing the need to travel in the first place. Ensuring high speed broadband access to all new homes, high quality walking and cycling links, improving access to rail and road-based passenger transport improvements can all assist in spreading demand, making more efficient use of local transport networks and mitigating the

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				<p>A449. The Park Gate Junction is a problem already.</p> <p>These roads are used as a rat run anyway. Let's improve the roads and the junctions.</p>	<p>transport impacts of development growth.</p>
	<p>LPPO3357</p>	<p>13.12</p>	<p>Comment</p>	<p>I write in respect of the implications for increased housing and economic growth within the Wyre Forest Development Plan on Hagley particularly on the A456, B4187 and A491.</p> <p>Hagley (these roads and intersections) suffer from daily transient traffic as part of both travel to work between Worcestershire, Birmingham and the Black Country and social and leisure destinations. This is shown with queuing traffic regularly as far back as Hackman's Gate and Blakedown, with further queues experienced in Churchill. As the queue continues slowly through Hagley it enters into a recognised increasing air pollutant area as well as a formal AQMA.</p> <p>Further queues are experienced along the B4187 towards Pedmore, Oldswinford towards Lye, Stourbridge and beyond.</p> <p>The A456 traffic continues beyond towards Halesowen in particular Manor Way and Gorsty Hill.</p> <p>The A456 is the busiest 'A' road in Worcestershire</p>	<p>Comments noted. Worcestershire County Council is well aware of the capacity constraints on the A456, and is working with partner Local and Regional Transport Authorities to make the case for strategic investment in this regionally important transport corridor; both for road and rail (Stourbridge Line). There are a number of reasons that congestion has become so severe on the A456 corridor. In particular, it is important to state that the economy of the Wyre Forest is in transition. The town's former carpet industries have declined and so many residents have sought work in the West Midlands Conurbation. As part of this refreshed Wyre Forest Local Plan, provision is proposed to significantly improve local employment opportunities, supporting diversification and growth of the local economy, which will provide suitably</p>

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				<p>with a recent daily traffic count averaging over 13,000 vehicles. These include unlimited weight constraints on HGVs. The road is relatively narrow, single carriageway in each direction running through developed housing, dissecting Hagley into two and causing pedestrian (school and to the shopping area) significant problems and safety concerns.</p> <p>Adding further development on the source routes will add significant pressure on an already over stretched, under capacity major road intersection. Recent reports from Worcestershire County Highways confirmed that traffic flows along these routes have already increased by 5% over the last year.</p> <p>This route is of strategic importance between Worcestershire, Birmingham and the Black Country as to limit access between these growth centres would surely restrict unconstrained growth plans.</p> <p>I therefore call upon the three LEPs from these areas to come together with a holistic and viable transport and travel plan using growth funds and recently reported Government Grants to assist in such infrastructure upgrades.</p> <p>Travel to work data clearly shows that significant numbers of travel journeys are made towards</p>	<p>remunerated employment within the District, reducing the need to travel, and so demand to use the A456. The Wyre Forest District also suffers from access to rail, which leaves many commuters with no choice but to drive to access employment opportunities, exacerbating congestion issues on the A456 corridor. The LTP4 and Worcestershire Rail Investment Strategy include ambitious plans to invest in Kidderminster, Blakedown and Hartlebury Stations and rail services, to provide commuters with a realistic, attractive alternative to driving. Over time, this will reduce demand to drive along the A456, which has finite capacity.</p> <p>Your comments on free car parking are noted, however, this is not within the County Council's control. Car parking charges are used by Train Operating Companies to cover the costs of operating and maintaining car parks, which are surprisingly high. As a result, it is very unlikely that free car parking will be provided at either</p>

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				<p>Birmingham and the Black Country with the M5/M40 being clear destinations with M6 and M42 being destinations slightly further a field.</p> <p>It makes perfect sense therefore that a link road MUST now be created to link up with the traffic Island at Fairfield which in turn gives ease of access to junction 4 at Bromsgrove.</p> <p>Further logic says that the link road should commence BEFORE Blakedown to relieve it too of transient traffic.</p> <p>I have been in touch with members of Blakedown Parish Council and they too are supportive of the need to take measures to alleviate transient traffic along its part of the A456.</p> <p>The rail link between Worcester (and other destinations which it serves) is under utilised and restricted by either pay to park or very limited parking facilities.</p> <p>Car parking should be free at all stations with greater capacity needed at both Kidderminster and Blakedown stations.</p>	<p>Blakedown or Kidderminster Stations, unless this was part of a Government funded initiative.</p>
	LPPO3553	13.12	Object	<p>Hagley suffer from daily transient traffic as part of both travel to work between Worcestershire,</p>	<p>Objection and comments noted. Worcestershire County Council is well</p>

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				<p>Birmingham and the Black Country and social and leisure destinations. This is shown with queuing traffic regularly as far back as Hackman's Gate and Blakedown, with further queues experienced in Churchill. Adding further development on the source routes will add significant pressure on an already over stretched, under capacity major road intersection.</p> <p>It makes perfect sense therefore that a link road MUST now be created to link up with the traffic Island at Fairfield which in turn gives ease of access to junction 4 at Bromsgrove.</p> <p>Further logic says that the link road should commence BEFORE Blakedown to relieve it too of transient traffic.</p> <p>I have been in touch with members of Blakedown Parish Council and they too are supportive of the need to take measures to alleviate transient traffic along its part of the A456</p> <p>The rail link between Worcester (and other destinations which it serves) is under utilised and restricted by either pay to park or very limited parking facilities.</p> <p>Car parking should be free at all stations with greater</p>	<p>aware of the capacity constraints on the A456, and is working with partner Local and Regional Transport Authorities to make the case for strategic investment in this regionally important transport corridor; both for road and rail (Stourbridge Line). There are a number of reasons that congestion has become so severe on the A456 corridor. In particular, it is important to state that the economy of the Wyre Forest is in transition. The town's former carpet industries have declined, and so many residents have sought work in the West Midlands Conurbation. As part of this refreshed Wyre Forest Local Plan, provision is proposed to significantly improve local employment opportunities, supporting diversification and growth of the local economy, which will provide suitably remunerated employment within the District, reducing the need to travel, and so demand to use the A456. The Wyre Forest District also suffers from access to rail, which leaves many commuters with no choice but to drive to access employment</p>

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				capacity needed at both Kidderminster and Blakedown stations.	<p>opportunities, exacerbating congestion issues on the A456 corridor. The LTP4 and Worcestershire Rail Investment Strategy include ambitious plans to invest in Kidderminster, Blakedown and Hartlebury Stations and rail services, to provide commuters with a realistic, attractive alternative to driving. Over time, this will reduce demand to drive along the A456, which has finite capacity.</p> <p>Your comments on free car parking are noted, however, this is not within the County Council's control. Car parking charges are used by Train Operating Companies to cover the costs of operating and maintaining car parks, which are surprisingly high. As a result, it is very unlikely that free car parking will be provided at either Blakedown or Kidderminster Stations, unless this was part of a Government funded initiative.</p>
	LPPO2941	13.12 Option A - Spennells	Object	<ul style="list-style-type: none"> • Traffic has increased already on the estate. • The development would increase this further creating pollution and noise and increase 	Objection is noted.

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				health problems.	
	LPP01702	13.12 Plough Lane, Far Forest	Object	Objects on the following reasons: <ul style="list-style-type: none"> Traffic increase/highway safety. 	Objection is noted.
	LPP01708	New Road, Far Forest BR/RO/7	Object	Objects on the following reasons: <ul style="list-style-type: none"> Traffic. 	Objection is noted.
	LPP01719	New Road, Far Forest BR/RO/7	Object	Objects on the following reasons: <ul style="list-style-type: none"> Traffic congestion at peak times already - constant flow of traffic for caravan sites/development on New Forest Close. Tractors and caravans some of the regular users of the narrow road. 	Objection is noted.
	LPP01726	13.12 New Road, Far Forest BR/RO/7	Object	Objects for the following reasons: <ul style="list-style-type: none"> Already struggle with volume of traffic. 	Objection is noted.
	LPP01731	13.12 New Road, Far Forest BR/RO/7	Object	Objects on the following reasons: <ul style="list-style-type: none"> Traffic already bad. 	Objection is noted.

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				<ul style="list-style-type: none"> Additional traffic will make accident inevitable. 	
	LPPO1733	13.12 New Road, Far Forest BR/RO/7	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> Traffic congestion is already bad on New Road - especially at peak times - this makes it difficult for larger vehicles to pass which frequently use the road. More development will make this worse. Bus service is poor for people who do not drive. Facilities in Far Forest are not suitable for an increase in population as it will cause more traffic and pollution. 	Objection is noted.
	LPPO1735	13.12 New Road, Far Forest BR/RO/7	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> Poor visibility for drivers. More cars down the lane will have an effect on wildlife, the lane and residents. Road frequently congested. Buses and farming vehicles frequently use the road. Narrow exits onto Cleobury Road. 	Objection is noted.
	LPPO1746	13.12 Plough	Object	<ul style="list-style-type: none"> Issues with access to the site. 	Objection is noted.

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		Lane, Far Forest BR/RO/4/6		<ul style="list-style-type: none"> Cars always break the speed limit on the road accessing the lanes. 	
	LPP01747	13.12 Plough Lane, Far Forest BR/RO/4/6	Object	<ul style="list-style-type: none"> Sewerage issues. Culvert blocks regularly. 	Objection is noted.
	LPP01762	New Road, Far Forest BR/RO/7	Object	<ul style="list-style-type: none"> Already congested at peak times. Residents struggle on/off their drives. Difficult to get out onto Cleobury Road. Difficult to pass parked cars. 	Objection is noted.
	LPP01772	13.12 New Road, Far Forest BR/RO/7	Object	<ul style="list-style-type: none"> Inadequate public transport. 	Objection is noted.
	LPP01805	13.12 Lickhill Road North LI/6/7	Object	<ul style="list-style-type: none"> Increased traffic on already busy road. Emissions from cars. 	Objection is noted.
	LPP01820	13.12 Burlish Crossing LI/5	Object	<ul style="list-style-type: none"> Increase in traffic - especially at peak times; affecting emergency services. Higher emissions - health risk. Concerned about access to the proposed site as road is already busy. 	Objection is noted.
	LPP01821	13.12 Burlish	Object	<ul style="list-style-type: none"> Traffic and fumes get worse every year - 	Objection is noted.

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		Crossing LI/5		<p>especially at peak times.</p> <ul style="list-style-type: none"> • People use Burlish Crossing as a shortcut so more houses will lead to more traffic chaos. 	
	LPPO1834	13.12 Lickhill Road North LI/6/7	Object	<ul style="list-style-type: none"> • Traffic already busy. • New housing estate will cause more problems. • One way system around Stourport. • Road is used as a rat run. • Why haven't we had a second bridge which was promised? • Most houses already have 2 or more cars - more houses mean more cars. 	Objection is noted.
	LPPO1839	13.12 LI/5	Object	<ul style="list-style-type: none"> • Only one bridge over river. • Traffic already an issue. • Green Belt Land should not be built on. • Protects from urban sprawl. • Inadequate infrastructure and services for new development. 	Objection is noted.
	LPPO1841	13.12 Option B - Rectory Lane AKR/15	Object	<ul style="list-style-type: none"> • Traffic is already bad. • Crossroads by the switch back are dangerous now. • Air quality would deteriorate further with more cars on the road. 	Objection is noted.

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	LPP01867	13.12 Pearl Lane/Rectory Lane AKR/14 & AKR/15	Object	<ul style="list-style-type: none"> Infrastructure struggles with traffic already without adding to it. 	Objection is noted.
	LPP01900	13.12 Burlish Crossing (LI/5), Lickhill Rd North (LI/6/7), Steatite Way (MI/6)	Object	<ul style="list-style-type: none"> Development will increase traffic and parking. 	Objection is noted.
	LPP01905	13.12 Pearl Lane (AKR/14), Rectory Lane (AKR/15)	Object	<ul style="list-style-type: none"> There would be traffic chaos. Cause issues for emergency services. Weekend/holiday traffic already has a considerable impact on the road to the bridge, being a tourist area. The only way north from Areley Kings is across the bridge and no roads can be built to alleviate the problem. Traffic from the Rectory Lane development would be joining this same road making the situation worse. 	Objection is noted.
	LPP01946	13.12 East of Kidderminster	Object	<ul style="list-style-type: none"> All roads are extremely busy and to more than double the volume of traffic would be very dangerous. 	Objection is noted.

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	LPP01955	13.12 East of Kidderminster - Spennells	Object	<ul style="list-style-type: none"> Road network would not cope with the extra volume of traffic. Bromsgrove Road is already congested regularly. 	Objection is noted.
	LPP01966	13.12 East of Kidderminster - OC4, OC5, OC6, OC13	Object	<ul style="list-style-type: none"> The estate is already used as a by-pass and more traffic will add to the dangers. The by-pass which has been suggested will never happen. More measures should be taken to reduce speeding traffic on the main roads. 	Objection is noted.
	LPP01989	13.12 East of Kidderminster - Baldwin Road/Offmore/ Comberton	Object	<ul style="list-style-type: none"> Road already congested at rush hour. New road would be necessary if development went ahead including bridges - this would be costly. Would have affect on the environment if new roads were built. 	Objection is noted.
	LPP02177	13.12 East of Kidderminster - Hurcott area	Object	<ul style="list-style-type: none"> Already traffic congestion, especially at peak times, as Hurcott Road is used as a rat run. New development will increase traffic, pollution and noise. Drivers already mount the pavement to negotiate traffic. Dangers in traffic will only get worse if new 	Objection is noted.

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				development goes ahead.	
	LPPO2322	13.12 Option A - Spennells	Object	<ul style="list-style-type: none"> • Fears the development is purely to facilitate the building of a new ring road which has been turned down by central government previously. • Development by Spennells, resulting in a bypass, will increase traffic leading to more noise and emission levels. • This will affect the health of the local population. 	Objection is noted.
	LPPO2595	13.12	Object	<p>The recent traffic diversions as a result of works at St Anne’s Church have started me thinking about possible revised permanent arrangements in Bewdley to improve traffic management in the town centre, the general attractiveness of the built environment and the town’s economic performance.</p> <p>Confirmation that the fire station site is likely to become vacant together with proposals for a new car park on the old medical centre site open up possibilities that were not previously there. This could be the opportunity to significantly improve the management of traffic in Bewdley and improve access to the Load Street car park redevelopment site.</p>	Objection and comments noted.

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				<p>If the direction of traffic flow in the Load Street car park was reversed and a road constructed through it the many conflicting traffic movements which currently cause traffic to gridlock could be eliminated. It would also considerably improve road safety for pedestrians at these junctions. This method of traffic operation has previously been impractical due to the sharp right turn necessary outside the fire station. However use of part of the fire station land for a new road would resolve this issue by allowing the road to be constructed with a wider radius.</p> <p>The outcome would be that all traffic in the Kidderminster direction would be directed to use the new road as creating effectively a circulatory one way system in Bewdley town centre. As a sub-option, this could be accompanied by reintroducing one way traffic in High street which appeared to work satisfactorily during the church works. The heavy traffic that used Severnside South during that period would not exist because the large majority was using it on diversion from Load Street which would not be closed under the proposed arrangements.</p> <p>Introduction of a one way system might allow part of Load Street to have wider pavements (or even herringbone parking) and may facilitate full pedestrianisation of Load Street on either the north or south side of St Anne’s Church which would</p>	

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				<p>dramatically improve the ambience of the town centre for visiting and shopping. The improved traffic flow at the Welch Gate/Dog Lane junction could also help resolve the air quality issue in Welch Gate. Adequate spaces for much needed coach parking could be incorporated. Current bus stops would be unaffected.</p> <p>There appears to be only one negative which is the narrow exit from the Load Street car park between the buildings previously occupied by Murray’s Pharmacy and Barclay’s Bank. However, this is no narrower than the highway around St Anne’s Church and might be controlled by traffic lights incorporating a pedestrian phase which could also replace the traffic lights outside the Guildhall.</p>	
	LPP04584	13.13	Comment	<p>There is a failure to take a holistic view of the housing need alongside that of the Southern/Eastern bypass and the development of the Railway Station.</p> <p>The Plan states ‘The recent completion of the Hoobrook Link Road (opened Sept 2016) will help ease delays along the A451 Stourport Road corridor’</p> <p>Has this been a planning failure? The opening of the link road despite assurances to the contrary has led to dreadful traffic backing up that at times creates</p>	<p>Comments noted. The County Council is monitoring the impact of the delivery of the Hoobrook Link Road on the local network. Evidence suggests that there has been a reduction in traffic passing through Stourport, but further monitoring is required to fully understand the impacts of investment before coming to a conclusion in this area. Please refer to the Worcestershire Local Transport Plan (LTP4) which sets out</p>

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				<p>gridlock on the A449 roundabout at its junction with Wilden Lane.</p> <p>Similarly the Southern Eastern Bypass does not receive the attention it merits in the Plan. The planning officers present at Heronswood Primary were unable to shed any light on the route but whatever route is selected it would still further deplete the Green Belt to the south of the Spennells Estate with each kilometre of road requiring a minimum of 5 acres of land. Is this route necessary? Most traffic travelling via Hagley to Bromsgrove, Droitwich or Worcester will take the A450 to Mustow Green. This route could be upgraded but the issue of Birmingham traffic westward bound via Bewdley is not resolved by a southern/eastern bypass.</p> <p>The Plan states 'The opportunities to increase car parking provision at Kidderminster Rail Station are limited and so improving parking provision at the alternative stations (Blakedown) will be valuable as an alternative means of providing for anticipated rail growth in the Wyre Forest'</p> <p>Why then has Blakedown been omitted from the proposed developments? It is a total nonsense to improve Kidderminster Station to the tune of £5 million+ when the car park is landlocked and cannot</p>	<p>planned investment in transport infrastructure and services in the Wyre Forest to support growth. This can be viewed here: www.worcestershire.gov.uk/LTP In addition, an important component of the refreshed Local Development Plan will be an Infrastructure Delivery Plan, which will set out required infrastructure (including transport) to enable planned development growth. This document will be prepared by Wyre Forest District Council and Worcestershire County Council in partnership with relevant transport service and infrastructure providers, and will include consideration of new highway infrastructure.</p>

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				<p>be extended. It is also illogical to call upon a percentage of Kidderminster commuters in the next 15 years to drive to Blakedown to park when there could be a development in Blakedown in order to prevent the additional traffic on the A456. This has a detrimental impact upon the green issues the plan seeks to resolve.</p> <p>It is illogical to require residents to travel to a station outside the town when some housing in that area would reduce miles travelled and therefore reduce pollution.</p>	
	LPPO360	Paragraph 13.15	Comment	Actually, what would improve connectivity for distant travel outside the district would be a service to Birmingham New Street, which was abandoned several years ago. The track infrastructure would easily allow this.	Comments are noted. However, rail service is the responsibility of Network Rail, not WFDC.
Churchill and Blakedown Parish Council	LPPO1026	paras. 13.15 - 13.28	Object	Blakedown Station is an important asset for village. Parking at station is an issue and has been discussed at length with County officers. An increase in parking provision requires improvements to road network - A4556 junction and weak bridge at bottom of Mill Lane. LTP4 mentions Parkway Station at Blakedown - large-scale development would not be welcome in village. Hodge Hill has been suggested and would need detailed study and discussion. Dispute suggestion that parking at Kidderminster is limited as overflow car park is not fully used. People object to	Objection and comments noted. To clarify, the LTP4 makes no mention of a Parkway station of Blakedown. Scheme WFST5 "Blakedown Rail Station Enhancement Scheme" proposes a major scheme to significantly improve the quality of facilities provided at this station. It is very likely that this will include a suitably sized station car park with obvious access improvements from

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				<p>paying to park here whereas Blakedown is free. Multi-storey car park should be explored at Kidderminster.</p>	<p>the A456. Worcestershire County Council is pursuing a Masterplan for this station, to clarify what might be possible to improve facilities at this location, based on evidence. The results of this will be used to prepare business cases for funding to support locally desired investment in this important facility, as suggested. The case for a multi-storey car park at Kidderminster will be explored, however, given the exceptionally high cost of this proposal, and the need for the local highway network to provide suitable access to accommodate increased vehicular trips that an expanded car park would generate, this is unlikely to be delivered in the short to medium term (5-10 years).</p>
	<p>LPPO3699</p>	<p>13.16</p>	<p>Object</p>	<p>This evidence of the second busiest station with main peak to Birmingham indicates how residents already do not work in or use universities in Kidderminster but are employed in and commute to large cities.</p> <p>You freely admit that these new residents will commute out of the region.</p>	<p>Objection is noted. The emerging Local Plan does propose to allocate employment sites. This would enable some people to live and work in Wyre Forest and not commute outside the District.</p>

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				This is further evidence that the house developments and increase in rail numbers who use the train is turning Kidderminster into a commuter town of large proportion without character, uniqueness, employment or soul.	
	LPPO3912	Paragraph 13.16	Object	Kidderminster station does not need to be improved as this will not increase passenger numbers whereas Blakedown station does need to improve its potential service. I object strongly to the development proposals.	Objection and comments noted. Worcestershire County Council is currently pursuing major investment in the quality of facilities at Kidderminster Station, as the current facilities are dilapidated and inadequate to accommodate planned growth. Similarly, a major scheme will be developed for Blakedown Station, to significantly improve the quality of facilities provided there, to improve access and accommodate planned growth in rail use.
	LPPO3913	Paragraph 13.17	Object	Kidderminster station does not need to be improved as this will not increase passenger numbers whereas Blakedown station does need to improve its potential service. I object strongly to the development proposals.	Comments noted. Worcestershire County Council is currently pursuing major investment in the quality of facilities at Kidderminster Station, as the current facilities are dilapidated and inadequate to accommodate planned growth. Similarly, a major scheme will be developed for Blakedown Station, to significantly improve the quality of facilities

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					provided there, to improve access and accommodate planned growth in rail use.
Wyre Forest Green Party	LPPO1412	Para 13.18	Comment	“It is vital that investment go toward measures to enhance bus/rail integration and active mode improvements”. The recently publicised plan of the “new” station has no bus interchange. In reality there seems little commitment to enhanced bus/rail integration.	Comments noted. The need for bus/rail integration was explicitly considered as part of the Kidderminster Station Scheme. Following dialogue with local bus operators, there was a desire not to operate buses within the station forecourt, due to the impact this would have on journey time reliability. Instead, bus stopping facilities on Comberton Hill are being improved to provide enhanced interchange at this location.
Historic England	LPPO1279	Para 13.18	Comment	Where schemes have been identified in paragraph 13.18 are there any impacts for the historic environment? If so, how are they being incorporated into the schemes and the Local Plan?	<p>Comment on paragraph 13.8 noted.</p> <p>The proposed enhancements to the rail station and its access have no direct impact on heritage assets.</p> <p>Where transport schemes are identified and brought forward for delivery, consideration of potential impact on the historic environment is fully embedded within our scheme development processes.</p>

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Wyre Forest Friends of the Earth	LPPO1318	Para13.18	Comment	“It is vital that investment go toward measures to enhance bus/rail integration and active mode improvements”. The recently publicised plan of the new station has no bus interchange. In reality there seems little commitment to enhanced bus/rail integration.	Neither Wyre Forest District Council nor Worcestershire County Council have much in the way of control in the provision of local bus networks, as these are now predominantly provided commercially. There remains a strong desire to see investment in local bus networks, but this will require Government funding to support such an initiative, as local funding is now scarce as a result of prolonged austerity.
	LPPO3914	Paragraph 13.18	Object	Kidderminster station does not need to be improved as this will not increase passenger numbers whereas Blakedown station does need to improve its potential service. I object strongly to the development proposals.	Comments noted. Worcestershire County Council is currently pursuing major investment in the quality of facilities at Kidderminster Station, as the current facilities are dilapidated and inadequate to accommodate planned growth. Similarly, a major scheme will be developed for Blakedown Station, to significantly improve the quality of facilities provided there, to improve access and accommodate planned growth in rail use.
	LPPO3700	13.18	Object	A large increase in train passengers to Birmingham as a result of already crowded trains.	Objection and comments noted. Any proposals for new railway stations will require a robust business case to

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				<p>A new station is useless if there are insufficient trains to support.</p> <p>Again why is Blakedown not included in this plan for housing developments? It has the train and road links already in place.</p>	justify investment.
	LPPO3702	13.19	Object	13.19 These are aspirations what evidence is there from commitment from the Rail providers, London Midland and Chiltern rail.	Comments noted. The Worcestershire Rail Investment Strategy is widely supported by all Train Operating Companies serving Worcestershire. Close partnership working with the rail industry continues to pursue the investment ambitions set out in that strategy, to the wider benefit of Worcestershire.
	LPPO3915	Paragraph 13.19	Object	Kidderminster station does not need to be improved as this will not increase passenger numbers whereas Blakedown station does need to improve its potential service. I object strongly to the development proposals.	Objection and comments noted. Worcestershire County Council is currently pursuing major investment in the quality of facilities at Kidderminster Station, as the current facilities are dilapidated and inadequate to accommodate planned growth. Similarly, a major scheme will be developed for Blakedown Station, to significantly improve the quality of facilities provided there, to improve access and accommodate planned growth in rail use.

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	LPPO3703	13.21	Object	13.21 – Note that Blakedown train station improvements but no impact to Blakedown – again why are they excluded from the local plan proposals? How can Blakedown benefit from monies into the region from Option A? There is no impact to them. This is completely undeserved.	Objection is noted.
	LPPO3916	Paragraph 13.21	Support	I support the statements made within 13.21.	Support is noted.
	LPPO3917	Paragraph 13.22	Support	I support the statements made within 13.21.	Support is noted.
	LPPO4479	13.23	Object	13.23 – Note that Blakedown train station improvements but no impact to Blakedown – again why are they excluded from the local plan proposals? How can Blakedown benefit from monies into the region from Option A? There is no impact to them. This is completely un deserved. Do you have councillors based in Blakedown? There appears to be some questionable behaviour here.	Objection is noted.
West Midland Safari Park	LPPO1329	Para 13.24	Comment	Paragraph 13.24 refers to the Severn Valley Railway as “one of the leading heritage railways in the UK”, and “one of the major tourist attractions in Worcestershire with over 200,000 visitors annually.” It also states that the potential exists to open up the line for commercial rail services. Potential exists to	Comments noted. This proposal is dependent on a suitably robust business case being generated to support investment, and the support of a number of partners in the rail industry. Worcestershire County

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				develop a halt along the line in this location to link the SVR to WMSP and allow visitors to the Park to arrive by rail. This is in the approved Masterplan and Planning Brief for the site, although the precise details of this halt would need to be agreed between the main stakeholders. This would increase the potential for sustainable access to the WMSP site. Consideration should be given to recognising this synergy between the District's two main tourist attractions and this should be recognised in the Policy and the supporting text.	Council is supportive of this proposal and recognises the potential benefits that this investment may deliver.
Worcestershire County Council, Planning Economy & Performance	LPP01373	Paragraph 13.24	Comment	"Department of Transport" should be "Department for Transport".	Comment is noted.
	LPP0592	13.24	Support	This potential should be actively pursued to reduce traffic & improve air quality in Bewdley.	Support and comment are noted.
South Worcestershire Authorities	LPP01247	13.27	Comment	Paragraph 13.27 refers to Worcestershire Parkway rail station. Whilst there will be a substantial (500 spaces) amount of parking in this location, the SWCs consider that the focus for the Wyre Forest District Local Plan should be on improving the accessibility of and services to/from local stations within Wyre Forest District (set out at 13.28) rather than the current wording which places an emphasis on park and ride from Worcestershire Parkway which could	Comments noted and agreed.

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				exacerbate congestion on routes such as the A449.	
Wyre Forest Friends of the Earth	LPP01320	Para 13.29	Comment	There is much in this Local Plan about “sustainable transport” and having a comprehensive network of bus services using low or zero emission vehicles would make a significant contribution to reducing congestion. Paragraph 13.29 on bus services identifies many of the reasons for the decline in bus use. There must be a plan to improve bus services which is not to be blown off course by developers’ plans or further cuts in government grants. Alternatives should be examined such as the District Council running some services.	Comments are noted.
Wyre Forest Green Party	LPP01413	Para 13.29	Comment	There is much in this Local Plan about “sustainable transport” and having a comprehensive network of bus services using low or zero emission vehicles would make a significant contribution to reducing congestion. There must be a commitment towards improvement of bus services across the district.	Comments are noted.
	LPP0162	13.29	Support	Lack of an evening public transport service and limited services of any sort to villages is having a severe affect upon businesses such as pubs and restaurants. Unless you live in one of the town centres that leaves few options for people to socialise in the evenings unless public transport can be improved. People living outside town centres and in rural locations are increasingly being socially excluded by the lack of public transport.	Support and comments are noted.

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	LPP0412	13.29 / 13.30	Comment	<p>The current bus network suffers from poor reliability not only "due to traffic congestion, lack of bus priority and poor interchange with Kidderminster Rail Station", but from a lack of commitment to sustainable forms of transport by WFDC and WCC. Bus services in the Wyre Forest are extremely poor. There needs to be a real desire by the councils to encourage residents out of their cars, by provision of high quality vehicles and efficient interconnecting services within and between the three towns. This will not be achieved without financial commitment.</p> <p>Small, electric, shuttle type buses as used in parts of Europe would be a real bonus in the town centres of Kidderminster, Stourport and Bewdley.</p>	Neither Wyre Forest District Council nor Worcestershire County Council have much in the way of control in the provision of local bus networks, as these are now predominantly provided commercially. There remains a strong desire to see investment in local bus networks, but this will require Government funding to support such an initiative, as local funding is now scarce as a result of prolonged austerity.
Worcestershire County Council, Planning Economy & Performance	LPP01231	Paragraph 13.30	Comment	<p>The statement that "Kidderminster bus station ... has some shortcomings" is extremely vague. The plan should specify what these shortcomings are.</p> <p>This statement could be changed to:</p> <p>Kidderminster Bus Station is in private ownership (Hendersons), forming part of the Weavers Wharf development and is not widely utilised. The bus station is accessed via Corporation Street, and provides access directly into the town centre. Despite this facility being relatively well located, in recent years, local bus operators have increasingly forsaken</p>	Comments are noted and agreed.

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				<p>the bus station in favour of bus stops in the vicinity of Exchange Square, as this reduces dwell time and operating costs, as well as being more popular with bus users. As a result, presently the bus station is only lightly used.</p> <p>The proposed reopening of Worcester Street to through traffic is expected to further reduce demand to use the bus station, as new bus stops proposed in the location will enable 'through' bus services to avoid Kidderminster Ring Road, operating through the heart of the town centre instead.</p>	
Wyre Forest Friends of the Earth	LPP01321	Para 13.32	Comment	<p>Active Travel Modes. After years when there was little provision for cyclists in the first few years of the new century there was progress in developing a network of safe cycle routes as well as better parking facilities. A significant development was the publication of the Wyre Forest Cycle Strategy in 2002 (http://www.wyreforestdc.gov.uk/media/107681/EB066WFDCCycleStrategy.pdf). Part of the strategy was a network of cycle routes to which local cyclists had a significant input. Over the last few years the implementation of the complete network has slowed considerably. There needs to be some investment to complete the network but the benefits in terms of reduced congestion and better health make such an investment very cost effective.</p>	<p>Comments noted. It is regrettable that investment in active travel networks in the Wyre Forest has slowed in recent years. This is sadly as a result of prolonged austerity, which has reduced available public funding to deliver such schemes. Ambition to deliver active travel enhancement schemes is higher than ever, and increased delivery will be pursued as and when Government funding is increased in this area.</p>
Wyre Forest	LPP01414	Para 13.32	Comment	Active Travel Modes: After years when there was	Comments noted. It is regrettable

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Green Party				<p>little provision for cyclists in the first few years of the new century there was progress in developing a network of safe cycle routes as well as better parking facilities. A significant development was the publication of the Wyre Forest Cycle Strategy in 2002 (www.wyreforestdc.gov.uk/media/107681/EB066WFDCCycleStrategy.pdf). Part of the strategy was a network of cycle routes to which local cyclists had a significant input. Over the last few years the implementation of the complete network has slowed considerably. There needs to be some investment to complete the network, but the benefits in terms of reduced congestion and better health make such an investment very cost effective.</p>	<p>that investment in active travel networks in the Wyre Forest has slowed in recent years. This is sadly as a result of prolonged austerity, which has reduced available public funding to deliver such schemes. Ambition to deliver active travel enhancement schemes is higher than ever, and increased delivery will be pursued as and when Government funding is increased in this area.</p>
	LPPO286	13.32	Support	<p>It is pleasing to see the aspiration to improve the situation for cyclists and encourage this from of transport for short journeys. The rapid rise in the availability and use of electric assist bicycles (1/3rd of all new bike sales in the UK are now electric assist) makes this a far more realistic and attractive proposition for a larger number of people who might otherwise rule out the bicycle as a means of transport. The Wyre Forest Cycle Forum has worked for many years, with some success, to try and achieve improvements in the cycling infrastructure. There is much more that can be done and the WFCF members would be pleased, and indeed keen, to help achieve such improvements.</p>	<p>Support and comments are noted.</p>

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	LPPO287	13.34	Support	The rapid rise in the use of electric assist bicycles is making this mode of transport a more realistic and attractive option. It provides a great opportunity to make such aspirations a reality and considerations regarding development of cycling infrastructure should take great heed of this revolution in cycling technology and the fact that many more people will be attracted to cycling as a result.	Support and comments are noted.
Worcestershire County Council, Planning Economy & Performance	LPPO1232	Paragraph 13.35	Comment	The wording of the final bullet point is awkward. Suggest changing to: "To deliver transport schemes to accommodate development growth set out in the Local Plan and any subsequent windfall development."	Comment and suggested amendment is noted and agreed.
	LPPO3918	Paragraph 13.37	Object	I object to the source of funding as being the mainstream of revenue.	Objection and comments noted. The County Council sources funding from a wide range of sources, including developer funding, to enable transport investment schemes to be brought forward. It is correct that ambition is often significantly greater than available funding, but without this ambition, we would deliver very little, so it is important that the County Council tries to deliver as much as possible, within the constraints of available funding.
Worcestershire	LPPO1233	Paragraph	Comment	The final sentence should form part of the policy	Comment is noted and will be

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County Council, Planning Economy & Performance		13.38		requirements of policy number 13 and should be moved into the policy itself and not form part of the reasoned justification.	considered.
	LPPO4731	Section 13	Comment	<p>No idea on what Policy 13 means in practice. However, I would make the comment that the new Hoobrook Link Road has just moved the 'pinch point' back to the Worcester Road Island at Hoobrook and now there are delays down the A449 and Wilden Lane.</p> <p>I am surprised that when asked to comment on the options in the plan there is reference to an Eastern Relief Road. I cannot immediately find any reference in this section for the justification for this road. Presumably this is in another of the many documents mentioned in this section but, as it is clearly so important I would have thought that it might have been mentioned.</p> <p>I can see from this Section that although a lot is happening across the district and the rest of Worcestershire there is still a lot to be done especially if these additional dwellings are constructed. Where is the finance coming from for this? What happens to this plan if none of this comes to pass? Section 13.38 about developers taking this into consideration: I am sure most will say they have</p>	<p>Comments noted. The County Council is monitoring the impacts of the Hoobrook Link Road on the local network. Evidence suggests that there has been a reduction in traffic passing through Stourport, but further monitoring is required to fully understand the impacts of investment. At this stage, until the quantum and location of planned development is clarified within this plan, it is not yet possible to state what facilitative transport infrastructure will be required to enable and support this growth. Worcestershire County Council will work with Wyre Forest District Council to assess the likely transport impacts of planned growth and identify required investment in transport infrastructure and services to mitigate this.</p>

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				<p>considered it, do nothing about it and expect local residents to live with the consequences. In fact the Company running the consultation about the land behind Baldwin Road implied that the dwellings would be for people who wanted to commute to Birmingham. Not sure how they will get through the traffic each day. Perhaps they will be able to park at Blakedown Station which I'm sure will be warmly welcomed by residents in that area!</p> <p>13.29 What is the proposal to increase the bus network within the area other than to switch the problem to charitable Community Transport.</p>	
	LPP04831	Section 13	Comment	<p>In para 13.5 and 13.6 of this section it is stated that "significant changes in travel patterns and travel behaviour is necessary".</p> <p>At para 13.10 it is stated that for further development to take place it will be necessary to have</p> <ul style="list-style-type: none"> • An efficient highway network with good links to the strategic highway network; • Excellent access to rail stations and improved rail services; • A convenient and efficient urban transport network; • High-quality active travel routes and 	<p>Comments noted. Please refer to the Worcestershire Local Transport Plan (LTP4) which sets out planned investment in transport infrastructure and services in the Wyre Forest to support growth. This can be viewed here: www.worcestershire.gov.uk/LTP In addition, an important component of the refreshed Local Development Plan will be an Infrastructure Delivery Plan, which will set out required infrastructure (including transport) to enable planned development growth. This document will be prepared by</p>

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				<p>corridors (walking and cycling) for shorter distance journeys, particularly in urban areas.</p> <p>However there appears in the Review few specific proposals as to how these aspirations will be delivered.</p> <p>Much play is made of the essential need for alternative modes of transport i.e. walking and cycleway. Yet is noticeable there is a complete absence of dedicated cycleway in the town at present.</p>	<p>Wyre Forest District Council and Worcestershire County Council in partnership with relevant transport service and infrastructure providers.</p>
	<p>LPP04862</p>	<p>Section 13</p>	<p>Comment</p>	<p><u>Road Infrastructure</u>: The whole of Wyre Forest has issues with traffic congestion and not necessarily just at peak times. Concentrating the main housing development in Kidderminster will certainly not improve matters. When travelling from Worcester to Kidderminster the A449 often comes to a halt on the dual carriageway at Hartlebury and then crawls the rest of the way. The majority of traffic continues along the Worcester Road towards the town centre which an Eastern Relief Road would have no impact. The new link road between Worcester Road and Stourport Road has produced a benefit for those wishing to travel to Stourport or access Stourport Road, however as the traffic lights that control this junction are relatively close to the A449 roundabout traffic soon backs up blocking the island causing</p>	<p>Comments noted and, in the most part, agreed. It is widely recognised that there is direct link between development growth and traffic growth. Improving roads and junctions (by increasing their capacities) is not the answer, because this simply encourages more people to drive, and so congestion becomes worse. In order to tackle congestion, it is necessary to focus investment on providing increased travel choice, as you rightly suggest, and reducing the need to travel in the first place. Ensuring high speed broadband access to all new homes, high quality</p>

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				<p>queues along the A449 which was predictable.</p> <p>The review makes much of improving the road infrastructure but how can this be achieved without starting with a blank sheet when the present road layout is so restrictive, this comment being applicable to Kidderminster, Stourport and Bewdley.</p> <p><u>Local Bus Services:</u> The review admits that the local services are not good and points at traffic congestion being the cause. This I could perhaps understand at peak times but at other times the service from Spennells is still poor as a result of punctuality or even non appearance. Recently while on vacation in the Lake District, a known tourist area with narrow roads, local busses were used extensively as they were punctual with modern vehicles. Therefore if the service was improved perhaps more people would leave their cars at home, but unless something changes this will not happen.</p> <p><u>Train Service:</u> I have used the service to Birmingham at peak times and the number of passengers boarding at Kidderminster or Blakedown is very low. It is only when the train arrives at Stourbridge that it fills up and continues picking up more passengers until only standing room if left. Returning from Birmingham the trains are packed but by the time the train leaves Stourbridge there are relatively few</p>	<p>walking and cycling links, improving access to rail and road-based passenger transport improvements can all assist in spreading demand, making more efficient use of local transport networks and mitigating the transport impacts of development growth. Worcestershire County Council will work with Wyre Forest District Council to assess the likely transport impacts of planned growth and identify required investment in transport infrastructure and services to mitigate this.</p>

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				<p>passengers remaining aboard.</p> <p>There is a reference in the review that the journey time from Kidderminster to Birmingham is too long having an average speed of 33mph. This is hardly surprising when you consider the number of stops and the number of passengers getting on or off the train. I fail to see how the journey time can be improved unless there are specific trains with fewer stops.</p> <p>Recently in the local press there were plans to develop Kidderminster Station yet it is accepted that there is inadequate parking and those wishing to travel by train should use the Hartlebury or Blakedown stations. This can hardly be environmentally friendly by putting more traffic onto already congested roads.</p> <p><u>Cycle ways:</u> There are comments that locals should use cycles more often or walk. Certainly there would be a benefit in reducing traffic congestion and improving the health. Unfortunately the roads are far too dangerous. Currently there are cycle lanes marked out on various roads which then stop as the road width is inadequate to accommodate powered vehicles and a cycle lane or they are inaccessible due to parked vehicles.</p>	

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				<p><u>Car Parking</u>: With a significant increase in local population there will be a need for increased parking or a total rethink on public transport and vehicle free zones. It is very unlikely that this will result in a reduction in the number of cars on the road as freedom of travel is seen as being essential. Residents will need parking spaces for their vehicles, but it is noted in the review that priority will not be given to making parking spaces available on the proposed new developments by the statement "car parking provisions will be minimised". The end result will be vehicles left on footpaths leading to disputes. You only have to look at streets with older properties in the area where there is no facility for parking, this results in only one vehicle being able to pass at a given time.</p>	
Hagley Parish Council	LPPO774	Transport and Accessibility in Wyre Forest District	Object	<p>Objection of Hagley Parish Council to new Wyre Forest Core Strategy.</p> <p>Hagley Parish Council adjoins Wyre Forest District and is thus highly interested in the adverse effects that the revised Core Strategy may have on Hagley.</p> <p>A description of A456:</p> <p>Parts of A456 are the busiest A-class road in Worcestershire. It passes through the village of Hagley, being a single carriageway road as far as the</p>	<p>Comments noted. Worcestershire County Council is well aware of the capacity constraints on the A456, and is working with partner Local and Regional Transport Authorities to make the case for strategic investment in this regionally important transport corridor; both for road and rail (Stourbridge Line). There are a number of reasons that congestion has become so severe on the A456 corridor. In particular, it is</p>

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				<p>Hagley Island and then a dual carriageway, which subsequently becomes the Halesowen Bypass and then a link road (Manor Way) to M5 J3. The Quinton Expressway then links this to Hagley Road in Birmingham. This has for many centuries been the main route from mid-Wales, Bewdley, Stourport, and Kidderminster to Birmingham; before the canal port of Stourport was conceived, it was the route from Redstone Ferry (which was replaced by Stourport Bridge). The capacity of the road is grossly inadequate:</p> <p>Manor Lane: At the Grange Roundabout with A459 (and B4551), the Bromsgrove to Dudley main road. In the evening rush hour traffic daily backs up from that roundabout almost to (and sometimes on to) the Motorway Roundabout at M5 J3, 2km back. The last alterations carried out by Dudley MBC to this roundabout did not noticeably improve traffic flow in Manor Way. There is also a Birmingham-bound queue in the morning rush hour. One solution to this (though a very expensive one) would be an underpass at the Grange Island. The ground levels for this are suitable, but a considerable amount of property would have to be bought. The Highway Authority responsible is Dudley MBC, but they have little incentive to improve it as it is peripheral to their district.</p>	<p>important to state that the economy of the Wyre Forest is in transition. The town's former carpet industries have declined, and so many residents have sought work in the West Midlands Conurbation. As part of this refreshed Wyre Forest Local Plan, provision is proposed to significantly improve local employment opportunities, supporting diversification and growth of the local economy, which will provide suitably remunerated employment within the District, reducing the need to travel, and so demand to use the A456. The Wyre Forest District also suffers from access to rail, which leaves many commuters with no choice but to drive to access employment opportunities, exacerbating congestion issues on the A456 corridor. The LTP4 and Worcestershire Rail Investment Strategy include ambitious plans to invest in Kidderminster, Blakedown and Hartlebury Stations and rail services, to provide commuters with a realistic, attractive alternative to driving. Over time, this will reduce</p>

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				<p>A456 in West Hagley: Traffic using the road towards for Birmingham has to pass through a congested area in West Hagley – Kidderminster Road South, then Worcester Road, then Kidderminster Road. This is a single carriageway road, though mostly wide-enough for three lanes. It was formerly marked as such, but such marking went out of favour, because it encouraged head-on collisions between overtaking cars. This section of road has two sets of traffic lights, one at Cross Keys Garage and the other at the junction with B4187 (and Summervale Road and Western Road – “Summervale lights”). The need to pass through Hagley is the cause of severe congestion. This is not only at weekday rush hours, but also from holiday-makers on Sunday afternoons and the Fridays before Bank Holidays, going to or from mid-Wales. The east-bound queue regularly stretches back to Webbs Garden Centre, 650m before Cross Keys Lights, and sometimes on to the hill going up from Blakedown, about 1.5km back from those lights, also with queues of 500-600m on A450. The west-bound queue regularly stretches from the Summervale Lights almost back to the Hagley Island, 900m back. This used to cause long queues on A491, where traffic could not get on to the island, due to traffic that could not get off it, but that has been improved by the signalisation of the island. Problem of traffic queuing down the hill to the Summervale Lights remains, County Highways stated that the</p>	<p>demand to drive along the A456, which has finite capacity.</p> <p>Worcestershire County Council does not agree with the assertion that much of the village of Hagley is designated as an Air Quality Management Area (AQMA). In fact, it is now proposed to revoke the AQMA in Hagley, because air quality has now improved to a point where it is within acceptable threshold levels.</p>

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				<p>volume of traffic has grown worse in the last year or two.</p> <p>Much of A456 in Hagley is an Air Quality Management Area. Solution would be a link road or bypass, between A456 and A491, south of Hagley, providing an alternative route past the single-carriageway section of A456 through West Hagley.</p>	
	LPPO3412	Option A	Object	<p>Greenfield development to east of town will increase existing traffic problems in Broadwaters, Horsefair, Comberton Road, Worcester Road. New roads do not help – they lead to an increase in traffic. Infrastructure needed to encourage walking/cycling/public transport – look at The Netherlands for ideas!!</p>	<p>Objection and comments are noted. Agree that there are some examples of good ideas in places like The Netherlands.</p>
	LPPO3697	Section 13	Object	<p>There are no references to increase in the number and frequency of trains required as a result of Option A from London Midland.</p> <p>A large increase in train passengers to Birmingham as a result of already crowded trains.</p> <p>A new station is useless if there are insufficient trains to support</p> <p>Again why is Blakedown not included in this plan? It has the train and road links already in place.</p>	<p>Objection is noted. We continue to consult with rail providers as we progress with the emerging Local Plan.</p>

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	LPP04032	13.7	Object	<p>“The recent completion of the Hoobrook Link Road (opened Sept 2016) will help ease delays along the A451 Stourport Road corridor and bring significant economic benefits to the area”</p> <p>I have yet to see any difference resulting from the Hoobrook Link Road. One possible reason is the lack of signposting at the island in Kidderminster where the bus depot is located. Stourport is still signposted along Stourport and not Worcester Road to access the link road. Drivers that do not know the area will naturally follow the signs for Stourport which miss out the link road completely.</p>	<p>Objection and comments noted. The County Council is monitoring the impacts of the Hoobrook Link Road on the local network. Evidence suggests that there has been a reduction in traffic passing through Stourport, but further monitoring is required to fully understand the impacts of investment. The County Council are exploring a revised signage strategy for this route, as suggested.</p>

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Sport England	LPPO213	Policy 14	Comment	<p>GI by definition can include playing fields and outdoor sport. Is this policy designed to cover this, if so it should reference the Playing Pitch Strategy?</p> <p>It appears that playing fields will be covered by Policy 20C but Policy 14 does not cross ref. to this policy. It may be that a sports site might be regarded as a strategic sports site - is this meant to be captured by this policy?</p>	Comments are noted. Policy 20C covers green spaces for playing fields and outdoor sport. Policy 20C will be informed by the Playing Pitch Strategy. Note the suggestion of cross-reference between Policy 14 and Policy 20C – agree that this could be helpful and this suggestion will be considered as the policies are drafted further.
	LPPO312	Policy 14	Comment	The draft plan, whilst promoting strategic Green infrastructure at Draft Policy 14, does not repeat the details of Adopted Policy SAL.UP3, nor specifically the proposed Stour Valley Country Park as shown on the adopted Proposals Map.	Comments are noted.
	LPPO587	Policy 14	Comment	Green infrastructure should be protected especially where it forms a transitional zone between habitats. This applies to North and West of Bewdley where open farmland between forest and settlement boundary is under threat from developers.	Comments are noted.
Miller Homes	LPPO982	Policy 14	Comment	Recognise that green infrastructure, <i>“the living network of green spaces, water and environmental systems in, around and beyond urban areas”</i> , is important to the principle of providing and enhancing green infrastructure networks. Welcome the inclusion of a ‘subject to	Comments noted. Further work will be undertaken on the GI evidence base as the emerging Local Plan progresses. The GI % target contributions for development on greenfield sites will be re-examined and the outcome will be fully justified in the

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				<p>viability' clause in relation to the provision of green infrastructure in the context of proposed Policy 14 on the basis that the National Planning Policy Framework (NPPF) requires that:</p> <p><i>“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable”.</i></p> <p><i>1 Page 193 - WFDC Local Plan Review Preferred Options consultation document.</i></p> <p><i>2 NPPF Para 173.</i></p>	refinement of these policies.
Worcestershire Wildlife Trust	LPPO1062	Policy 14	Comment	We are pleased to support the intent of this policy and the weight it gives to protecting, enhancing	Comments are noted and welcomed. WFDC will engage and work collaboratively with

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				<p>and, critically, managing the district’s GI network. However we would recommend some small amendments to provide greater clarity and offer a more robust policy framework in this area.</p> <p>We welcome the commentary provided in Sections A and B but we would recommend that you make clear that there are other elements of GI (small woodlands, significant wetland and other grasslands for example) that are also important components of the district’s network. It would be helpful to set this out on the policies map but for some smaller parcels it may prove more effective to cover this in policy wording instead. In this regard we welcome references to the Worcestershire GI Framework and Concept Statements and would be pleased to discuss how these might be used to inform decisions in the future.</p> <p>We welcome the intention to include specific targets for GI in Section C. but we query the levels set. We cannot find reference to an evidence base used to determine the figures and so we would recommend that these are re-examined in the light of the approach taken elsewhere in the county. In particular we note that the South Worcestershire Development Plan sets a figure of 40% GI (excluding private gardens) for sites over</p>	<p>WWT and the Worcestershire Green Infrastructure Partnership to refine Policy14 as the emerging Local Plan progresses. We will re-examine the GI % targets as suggested and ensure that a suitable evidence base is in place to justify fully the outcome of this work.</p>

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				<p>1ha. We would strongly recommend that the same approach be taken here unless there are overriding planning reasons, demonstrated in the evidence base, meaning that this cannot be achieved.</p> <p>We are pleased to endorse the principle of early engagement in GI discussions set out in Section D and we would add to this the option of progressing GI Concept Statements for larger sites with the Worcestershire Green Infrastructure Partnership (WGIP). We would be happy to discuss this further with the council if that would be helpful. In the meantime we recommend that the policy draws specific attention to the WGIP and the potential it has to help with GI and collaborative working aimed at promoting more sustainable development in Worcestershire.</p>	
Stourport High School	LPPO1176	Policy 14	Comment	<p>We have no particular objection to the requirements of Policy 14 – Strategic Green Infrastructure, requiring 35% GI provision on greenfield sites exceeding 1 hectare. The Council must, however, recognise the impact this will have on the capacity of the proposed allocations. The implications of this policy is that 35% of the gross development area will be immediately lost to green infrastructure provision. The provision of roads and associated infrastructure are likely to</p>	<p>Comments are noted. The GI % target contributions for development on greenfield sites will be re-examined and the outcome will be fully justified in the refinement of these policies.</p>

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				<p>reduce the net developable area by a further 15%. If onsite provision is required for additional facilities such as schools, community facilities and other such uses, this will further reduce the net developable area. As a consequence, it is our view that the gross to net site ratio on each of the greenfield allocations will be 50% provision at best. This will have implications for the quantum development each site can deliver.</p>	
<p>Worcestershire County Council, Planning Economy & Performance</p>	<p>LPP01234</p>	<p>Policy 14</p>	<p>Comment</p>	<p>The policy needs to be accompanied by a definition of green infrastructure, preferably the definition used in the Worcestershire GI Partnership. The policy also needs to clarify whether the policy will include gardens as part of the GI requirement. The standard GI approach in Worcestershire is to exclude gardens from assessment of GI on development sites because there is no certainty of their future management, limiting their GI value.</p> <p>We welcome the recognition and mapping of biodiversity assets (including priority habitats) as GI assets. We would advocate that the semi-natural habitats which connect these GI assets are also critically important in ensuring their conservation (as echoed in Paragraph 11.32). This would benefit from further clarification and</p>	<p>Comments are noted and welcomed. WFDC will engage and work collaboratively with WCC and the Worcestershire Green Infrastructure Partnership to refine Policy14 as the emerging Local Plan progresses. We will re-examine the GI % targets as suggested and ensure that a suitable evidence base is in place to justify fully the outcome of this work.</p>

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				<p>greater weight in Policy 11D and Policy 14.</p> <p>We welcome the cross-referencing of Strategic GI Policy 14 within the contexts of Policy 11D, 27c (Diii) and 27E. We would encourage further cross-referencing within paragraphs addressing each of the key strategic development areas outlined earlier.</p> <p>Currently, Policy 14 (Clause D) encourages developers to agree with Wyre Forest District Council the Green Infrastructure 'matters' prior to application. It would be beneficial to make a clear reference to the services available through WGIP in this process. We would therefore welcome inclusion, within the reasoned justification for Policy 14 of Green Infrastructure Concept Plans where these are available and have been endorsed by Wyre Forest District Council. While the production of Green Infrastructure Concept Plans has historically been at the behest of each Local Planning Authority, as indicated in Paragraph 14.4, the GI Partnership welcomes collaborative working with developers in developing GI Concept Plans for key allocations and in achieving the aspirations for strategic GI as otherwise set out in Policy 14.</p> <p>In turn, WGIP will look to Wyre Forest District</p>	

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				<p>Council as both a GI Partner and key stakeholder in endorsing and/or adopting GI Concept Plans, and in the role of advocating with potential developers so that genuine engagement with GI Concept Plans is possible at the earliest possible stage.</p> <p>Part A states that "The existing green infrastructure network within the District will be shown on the Policies Map and will be safeguarded from inappropriate development". We welcome this statement and will work with WFDC to undertake the necessary analysis of the green infrastructure network to include on the policies map. This will necessarily be high level and more detailed work will be required to ensure that individual development proposals do not have an adverse impact on the green infrastructure network.</p> <p>Part C should aim to deliver 40% GI, notwithstanding site-by-site viability. 40% GI is an established, aspirational target for development across Worcestershire, whereby the capacity to deliver multifunctional GI and connectivity is maximised. For the standards in part C, there is also a need to specify whether this includes private gardens, communal spaces, etc. We understand that the figure of 35% was derived</p>	

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				from the viability assessment. However, in our comments on the viability assessment we have questioned the understanding of green infrastructure that underpins this assessment and hence, query the need for the 35%. Delivery of green infrastructure has always been subject to viability, as with all other proposals in the plan. We also have concerns about the justification of a 35% target and how this could be evidenced at an EIP.	
Worcestershire County Council, Planning Economy & Performance	LPP01374	Policy 14	Comment	Part D refers to "Worcestershire's" but it should be just "Worcestershire".	Comment noted. Amendment agreed.
Persimmon Homes Limited	LPP01429	Policy 14	Comment	No particular objection requiring 35% GI provision on greenfield sites exceeding 1 hectare. This will have effect on capacity of the proposed allocations. 35% of the gross development area will be immediately lost to green infrastructure provision, roads and associated infrastructure are likely to reduce the net developable area by a further 15%. If on-site provision is required for additional facilities such as schools, community facilities and other such uses, this will further reduce the net developable area. As a consequence, the gross to net site ratio on each of the greenfield allocations will be 50% provision at best. This will have implications for the quantum	Comments are noted. The GI % target contributions for development on greenfield sites will be re-examined and the outcome will be fully justified in the refinement of these policies.

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				<p>of development which each site can deliver.</p> <p>Important to ensure that the capacity of the allocations have been assessed on a realistic basis.</p>	
Taylor Wimpey West Midlands	LPP01538	Policy 14	Comment	<p>Concern that this requirement will negatively impact upon a number of policies set out above, including housing land supply, density and viability. The inclusion of a specific percentage is too prescriptive and green infrastructure provision should be considered on a site by site basis.</p>	<p>Comments are noted and will be considered as we continue to refine Policy 14.</p>
Persimmon Homes Limited	LPP01563	Policy 14	Comment	<p>Policy is not clear, due to the lack of evidence, as to where the figures for new development have been derived from. The numbers and location of new infrastructure must be proportionate to local evidence.</p> <p>Do not agree with the Council's current evidence as part of this policy and would expect that this is given further consideration prior to submission, to ensure that the evidence is proportionate and takes into account local data.</p>	<p>Comments are noted. The evidence base for this policy will be reviewed as work progresses on the emerging Local Plan.</p>
The Woodland Trust	LPP0528	Policy 14	Object	<p>We are disappointed that you do not seem to have taken on board the comments that we made at the issues and options stage on the need to have a strong policy on protection of existing trees and woods and on seeking opportunities for planting more trees and woods, particularly as</p>	<p>Objection and issues raised are noted. We will consider these suggestions and refine the GI policies as necessary.</p>

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				<p>part of new development.</p> <p>We would have preferred to have seen a separate policy on trees and woods, given the range of social, economic and environmental benefits that they can provide and which we set out in some detail in our Issues and Options submission.</p> <p>In particular, we would like to see ancient woodland and ancient or veteran trees given the strongest possible level of protection in your local plan. Ideally we would like to see a statement that these assets, being irreplaceable, should be protected in all but the most wholly exceptional circumstances. The need to protect ancient woodland and veteran trees is set out clearly in paragraph 118 of the NPPF and, by omitting any reference to these assets in your preferred options document, you run the risk of your new local plan not being in conformity with the NPPF. This is particularly concerning given that your existing development plan policies and site allocations document does contain references to the importance of ancient woodland and lists some important ancient woods within the district.</p> <p>The National Planning Policy Framework (NPPF) also supports the need for more habitat creation by stating that: <i>Local planning authorities should:</i></p>	

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				<p><i>set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure', (DCLG, March 2012, para 114). Also para 117 states that: 'To minimise impacts on biodiversity and geodiversity, planning policies should:....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan'.</i></p> <p>The England Biodiversity Strategy which makes it clear that expansion of priority habitats like native woodland remains a key aim - <i>'Priority action: Bring a greater proportion of our existing woodlands into sustainable management and expand the area of woodland in England', (Biodiversity 2020: A strategy for England's wildlife and ecosystems services, DEFRA 2011, p.26).</i></p> <p>A reading of these two policies in the National Planning Policy Framework together with the England Biodiversity Strategy indicates that habitat expansion, like native woodland creation, should form a high priority for this new Local Plan.</p>	

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				<p>Research by the Woodland Trust shows that less than 17% of the population of England has access to local woodland within 500m of their home (vi) and this figure is the same for Wyre Forest. Recognising this, the Woodland Trust has developed the Woodland Access Standard (WASt) for public bodies and local authorities to aim for, encapsulated in our <i>Space for People</i> publication. We believe that the WASt can be an important policy tool complimenting other access standards used in delivering green infrastructure for health benefits.</p> <p>The WASt is complimentary to Natural England’s ANGST+ and is endorsed by Natural England (further details on <i>Space for People</i> can be provided on request). The Woodland Trust Woodland Access Standard recommends:</p> <ul style="list-style-type: none"> - that no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size - that there should <u>also</u> be at least one area of accessible woodland of no less than 20ha within 4km (8km round-trip) of people’s homes. <p>Providing more accessible trees, woods and green space for physical activity can therefore provide a</p>	

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				<p>critical link to healthier lives and, consequently, to saving money.</p> <p>We would therefore like to see a policy point for green infrastructure to read ==</p> <p><i>“Protection, enhancement and creation of native woodland will be supported for the benefits it can bring to green infrastructure including for health & wellbeing”.</i></p>	
Miller Homes	LPP0985	Policy 14	Object	<p>Object to the inclusion of the specific requirement for a 35% contribution from green field sites of greater than 1 hectare towards the provision, maintenance, improvement and connectivity of green infrastructure on the basis that the evidence base does not provide justification for this specific figure. This needs to be addressed on a site by site basis. It may be that a smaller proportion of land can create a more significant green link by design, and contribute better to the policy objectives via location within the site, additional planting and habitat creation, rather than an arbitrary percentage figure.</p> <p>The NPPF (3) makes it clear that each local planning authority should ensure that their Local Plan is based on adequate, up-to-date and relevant evidence. The evidence base reporting</p>	Objection is noted. Further work will be undertaken on the GI evidence base as the emerging Local Plan progresses. The GI % target contributions for development on greenfield sites will be re-examined and the outcome will be fully justified in the refinement of these policies.

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				<p>relating to green infrastructure appears to be provided by the Worcestershire Green Infrastructure Strategy 2013-2018, the Worcestershire Green Infrastructure Framework 4 (September 2014), the Wyre Forest District Council (WFDC) Green Infrastructure Strategy (October 2012) and the WFDC Green Infrastructure Study (January 2010). None of these four green infrastructure evidence reports identify and justify a specific contribution that new development should make towards the provision, maintenance, improvement and connectivity of green infrastructure. In addition, this specific 35% green infrastructure contribution requirement does not appear to have been explicitly tested within the WFDC Local Plan Viability Assessment (May 2017). Requests that it is made clear what the justification is for this specific contribution. If there is no evidenced justification then this requirement should not be included within the Local Plan. Further, there is no recognition that smaller quality green spaces in the right places can make a better green space contribution than larger area of land that do not fulfil the objective.</p> <p><i>3 NPPF Para 158.</i></p>	
Stanmore	LPO1514	Policy 14	Object	Objection is made to Part C of this policy which	Objection is noted. The GI % target

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Properties Ltd		- Section C		<p>states that for greenfield sites of over 1 ha new development will be required to contribute 35% green infrastructure. Part D states this will be protected as semi natural ‘green space.’ There is no definition of what land can be included in Green Infrastructure but the implications throughout the plan are that residential garden land is not included and if this is the case it immediately leads to the loss of 35% of site area which is an unnecessarily inefficient use of land.</p> <p>In circumstances where land is needed to be released from Green Belt, it will lead to considerably more land having to be released than is necessary. Public open space must be provided on new sites and this will contribute towards green infrastructure so there is no justification for additional green infrastructure over and above what is necessary for the development.</p>	contributions for development on greenfield sites will be re-examined and the outcome will be fully justified in the refinement of these policies.
	LPPO311	Policy 14	Support	Supports Policy 14 but asks for the specific inclusion of the Stour Valley Country Park, both in the text and in the Proposals Map.	Support is noted.
	LPPO3822	Policy 14	Comment	The LPR lacks significant policies for such green infrastructure, as well as the more usual new ‘walking and cycling’ routes. It should consider at this stage opening up new green paths for access to such areas as Burlish Top and to Severn Way as well as providing secure cycle routes linked to	Comments and suggestions are noted.

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				<p>national ones. A scheme to ensure development does not intrude into the sensitive rural, landscape of this western and north-western edge of Stourport would enhance the locality. Whatever development is proposed should have policies set out in this plan, so as to specify green infrastructure at the outline stages, with higher than normal arrangements than for 'average' landscape buffers for these sensitive but visually prominent north western and western edges.</p> <p>However the above aspects need to be set out in the Local Plan at this stage so as to secure appropriate development.</p> <p>Green technologies, design codes, landscaping and materials guidance should also be set out at this stage so prospective developers are aware of the significance/importance of the site. It is an opportunity for the Council to set standards for the future as well as contribute to the housing market in an innovative way.</p>	
Worcestershire County Council, Planning Economy & Performance	LPP01235	14.2	Comment	The first sentence of this paragraph states that "The District has a unique environment formed from different landscape character areas". It should be noted that landscape character areas only cover the rural parts of the district. The environment is also important in urban areas.	Comments and suggestions are noted.

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				In addition to the waterways, Wyre Forest and its landscape setting, plus other areas of woodland (e.g. Chaddesley Wood and Kingsford) offer opportunities for enhancing the currently fragmented areas of woodland that are a significant feature of the district's GI in need of better connectivity.	
	LPPO4732	Policy 14	Comment	Let's hope that the words in this section are put into practice. At the moment I haven't noticed much green on the Silverwoods development.	Comments are noted.
Barratt Homes West Midlands	LPPO775	Policy 14	Comment	We have strong reservations to the requirements of Policy 14 – Strategic Green Infrastructure that requires 35% GI provision on greenfield sites exceeding 1 hectare. This will impact on site capacity. If 35% is used for Green Infrastructure and up to 15% for roads etc, then only 50% will be available for development. If schools and other facilities are required, this will reduce still further.	Comments are noted. The GI % target contributions for development on greenfield sites will be re-examined and the outcome will be fully justified in the refinement of these policies.
	LPPO3704	Policy 14	Object	There are no guarantees that these areas will not be built over in the future as your plan will only encourage more house building for social housing. This is because once you start building on Green Belt as you propose to do, it will be a magnet for more as it will be easier to house social housing in Wyre Forest than elsewhere. The Plan should consider using brownfield and	Objection is noted. Brownfield sites have been considered in the emerging Local Plan. Unfortunately, the issue is we don't have enough deliverable brownfield land left to accommodate all of our housing need for the district. We therefore have to consider allocating greenfield sites, some of which are located in the Green Belt. Agree that some residential use could be accommodated in

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				building apartments in the town. This is currently what Birmingham and other towns do. It helps bring more life to the town and houses more people. Especially single occupants who make up the larger proportion of social housing need.	the town centre. We will consider this idea more as the Plan progresses.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Environment Agency	LPPO1065	Policy 15A	Comment	<p>We note the recommendations set out in Table 4-7 of the WCS include “Using planning policy to require the 110l/person/day water consumption target permitted by National Planning Policy Guidance in water-stressed areas.”</p> <p>Paragraph 1.1.2 of the WCS acknowledges all site allocations are located within an area considered to be under 'moderate' water stress which could be used to justify the tighter ('optional') water efficiency standards in this instance i.e. beyond the minimum building regulation requirements.</p> <p>We note reference is made to the higher water efficiency targets within the reasoned justification to policy 15A (paragraph 15.6). However, in light of the above you may wish to include this within the policy itself. We appreciate you must demonstrate that there is both a need for the standards and show consideration of the viability implications of adopting the standards. DCLG study 2014 showed an additional cost of £0-9 per dwelling to achieve 110l/day.</p> <p>As outlined previously, we may be able to provide a separate summary document, including a location plan of each of the over abstracted wetlands and surface water catchments in the District, to help further inform the above.</p>	Comments are noted. The Water Cycle Study will be updated as the emerging Local Plan progresses. These comments will be considered during the update of the WCS and amendments made as necessary.
Worcestershire	LPPO1236	Policy	Comment	Part (i) calls for develop that "Incorporates design features	Comments are noted. Agree that more

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County Council, Planning Economy & Performance		15A		that will reduce water consumption". If this is to be included, more detail is needed on the level of reduction required if this is to be over and above existing Building Regulations. As part (ii) is not exclusive, everything in part (iii) would technically be covered by part (ii). However, there is a different emphasis in the two clauses which could be strengthened to benefit the policy and provide greater clarity.	detail is required for part (i) of Policy 15A. Parts (ii) and (iii) will also be strengthened and made clearer. Policy wording has been amended to take into account these suggested changes. i.e. amended Policy 15A part (i) and merged (ii) and (iii). Added justification for 110l/p/d standard.
Taylor Wimpey West Midlands	LPPO1539	Policy 15A	Comment	Planning policies should not accelerate beyond requirements of building regulations, without evidence to support that requirements are deliverable and will not prevent the delivery of housing.	The additional costs of meeting this target have been assessed as being as little as £9 per dwelling (DCLG Housing Standards Review (Sept 2014) and is therefore not deemed to prevent the speedy delivery of housing.
Environment Agency	LPPO1181	Policy 15B	Comment	We note that some proposed sites would require infrastructure and/or treatment upgrades or provision of new infrastructure. We recommend should the findings of the WCS and the further assessment identify a need for phasing of delivery, this is referenced in the policy, perhaps in section iii.	The current wording in section iii provides sufficient grounds to ask for phasing. There is no need to be more specific, especially as not referring to the Water Cycle Study findings will provide more flexibility to take into account emerging information.
Taylor Wimpey West Midlands	LPPO1540	Policy 15B	Comment	No comments.	No comments have been made.
The Woodland Trust	LPPO529	Policy 15B	Object	Policy 15b fails to mention the important role which trees and woods, planted in the right location, can play in	Objection is noted. However, disagree that trees should be mentioned in Policy

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>improving water quality.</p> <p>Trees trap and retain nutrients (such as phosphates and nitrates) and sediment in polluted run-off before it reaches rivers and streams.</p> <ul style="list-style-type: none"> • They can also prevent spray drift of pesticides by providing a physical barrier between fields and watercourses. • Trees provide shade that is essential in helping prevent a rise in river temperatures and helping freshwater wildlife adapt to climate change. <p>Trees can also provide a source of woody debris in rivers and streams which is beneficial for many species of plants, invertebrates and fish</p>	15B.
	LPPO1705	Plough Lane, Far Forest	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> • Change skyline – overlooking onto existing properties. 	Objection is noted.
	LPPO1712	New Road, Far Forest BR/RO/7	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> • Inadequate sewerage system. 	Objection is noted.
	LPPO1723	New Road,	Object	<p>Objects on the following reasons:</p>	Objection is noted.

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		Far Forest BR/RO/7		<ul style="list-style-type: none"> Sewerage inadequate. 	
	LPPO1736	New Road, Far Forest BR/RO/7	Object	<ul style="list-style-type: none"> Sewerage system inadequate. 	Objection is noted.
	LPPO1771	New Road, Far Forest BR/RO/7	Object	<ul style="list-style-type: none"> Inadequate sewerage system. Inadequate water system - low water pressure. 	Objection is noted.
North Worcestershire Water Management	LPPO908	Policy 15C part i	Comment	It is my understanding that in line with the NPPF a Sequential Test will still need to be undertaken to demonstrate for sites at risk of flooding that there are no reasonable alternative sites available in areas at lesser risk of flooding. This Sequential test should in my opinion form part of the Local Plan evidence base.	Agree with these comments. It is our intention to undertake a sequential flood risk assessment and this will form part of the evidence base for the emerging Local Plan.
North Worcestershire Water Management	LPPO909	Policy 15C v)	Comment	'for' is missing before 'biodiversity benefits'	Agree. This will be amended. ACTION – Make amendment as suggested to part (v) in Policy 15C.
Worcestershire County Council, Planning	LPPO1377	Policy 15C	Comment	Should the second sentence in part (v) be amended to become "...appropriately landscaped <u>for</u> biodiversity benefits"?	Comment is noted. Agree that the word 'for' should be inserted into the sentence in part (v) of Policy 15C.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Economy & Performance					
Taylor Wimpey West Midlands	LPPO1541	Policy 15C	Comment	No comments.	No comments necessary.
The Woodland Trust	LPPO530	15C	Object	<p>Trees and woodland can reduce localised flooding and alleviate the effects of larger floods in a variety of ways, including:</p> <ul style="list-style-type: none"> • Water penetrates more deeply into the woodland soils (higher infiltration rates) leading to less surface run-off. • Trees, shrubs and large woody debris alongside rivers and streams and on floodplains act as a drag on flood waters, slowing down floods and increasing water storage. • Trees protect soil from erosion and reduce the sediment run-off, which help the passage of water in river channels, reducing the need for dredging. • The greater water use of trees can reduce the volume of flood water at source. • Trees slow the speed at which rain reaches the ground, with some rain evaporating into the atmosphere - even in winter native deciduous trees intercept up to 12% if rainfall. <p>A joint Environment Agency/Forestry Commission publication Woodland for Water: Woodland measures for meeting Water Framework objectives states clearly that: <i>'There is strong</i></p>	Objection is noted. We will consider these comments as Policy 15C is further refined.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p><i>evidence to support woodland creation in appropriate locations to achieve water management and water quality objectives'</i> (Environment Agency, July 2011- http://www.forestry.gov.uk/fr/woodlandforwater)</p> <p>The Government's Independent Panel on Forestry (Defra, Final Report, July 2012) has emphasised this natural approach by stating that:</p> <p><i>'One of the many benefits of woods and trees is their ability to help us respond to a changing climate, better enabling us to adapt to future temperature increases. We know that trees, in the right places, help us to adapt to climate change by reducing surface water flooding; reducing ambient temperature through direct shade and evapo-transpiration; and by reducing building heating and air-conditioning demands</i></p>	
Worcestershire Wildlife Trust	LPPO1066	Policy 15C	Support	Support this policy, particularly bullet points iv and v.	Support is noted.
Environment Agency	LPPO1182	Policy 15C	Support	We support inclusion of policy 15C. In accordance with paragraph 50 of the Flood Risk and Coastal Change section of the National Planning Practice Guidance (NPPG), we recommend section ii, fourth bullet point, not only makes reference to developments not increasing flood risk elsewhere but also includes reference to opportunities for reducing flood risk overall. We also advise that the	Support is noted and welcomed. Amendments will be made to Policy 15C and its reasoned justification as suggested. The local climate change guide will also be referenced to for

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				supporting text is amended in light of the above to acknowledge that whilst Policy 15C ensures individual developments do not increase the risk of flooding, it is also important that the cumulative impact of growth within the LPR does not increase the risk of flooding and where appropriate provides betterment. Opportunities to deliver flood risk management infrastructure to address the impacts of growth will therefore be sought as an integral part of implementing the LPR. We note the policy requires appropriate allowances for climate change to be used in Flood Risk Assessments (FRAs), referencing the latest Government's Climate Change Allowances Guidance. For completeness, to assist planners and developers we have produced a local Climate Change Guide which could be referenced in the policy instead.	completeness. Note: Amended (iii) and made reference to EA's local Climate Change Guide.
Taylor Wimpey West Midlands	LPPO1542	Policy 15D	Comment	No comments.	No comments necessary.
Worcestershire Wildlife Trust	LPPO1067	Policy 15D	Comment	We are pleased to support the intent of this policy and we welcome the weight it gives to the need for well designed SUDS. However we would recommend that the policy include specific mention of the presumption in favour of SUDS that are soft-engineered, multi-functional and biodiversity led. This is set out in paragraph 15.20 of the reasoned justification but it would offer improved clarity and robustness to the policy if it were included in the policy wording itself.	Comment is noted and agree that amendment should be made to the wording of Policy 15D to incorporate this suggestion.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
North Worcestershire Water Management	LPPO911	Policy 15D vi)	Comment	<p>This policy section currently reads:</p> <p>“Design and construct the surface water drainage scheme so that the water quality of receiving water bodies, covered by the Water Framework Directive, are not adversely impacted, both during construction and when operational.”</p> <p>WFD covers more than just water quality and it is important to protect all water bodies, not just the ones covered by WFD, from the potential impact of surface water drainage schemes. I therefore would like to propose to alter this policy section to:</p> <p>“Design and construct the surface water drainage scheme so that the receiving water bodies, including but not limited to the ones covered by the Water Framework Directive, are not adversely impacted, both during construction and when operational.”</p>	Agree with this suggested change. Policy 15D will be updated to include this amendment.
North Worcestershire Water Management	LPPO914	Policy 15D	Comment	<p>Add “vii) Include aboveground, green SuDS where possible to add to the Green Infrastructure and biodiversity of the area”</p> <p>This text was included in an earlier draft, so I’m not sure why it has been removed. I believe it is important to include this policy as aboveground, green SuDS provide so much more additional benefits than simply dealing with the runoff from the development. There are benefits for biodiversity, water quality and also amenity.</p>	Agree with suggestion. Policy 15D will be updated to include vii as suggested.

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Worcestershire County Council, Planning Economy & Performance	LPPO1375	15.2	Comment	In the fourth bullet point, "affect" should be "effect".	Agree that this should be amended.
	LPPO3919	15.2	Object	The phasing of the provision of 6000 dwellings will do nothing to alleviate the impact on the water issues.	Objection is noted. The Wyre Forest Water Cycle Study (2017) considers issues of water resources, wastewater and flood risk and forms a key part of the evidence base alongside the Wyre Forest Strategic Flood Risk Assessment (2017). Both of these evidence base documents will be updated as the emerging Local Plan progresses.
Worcestershire County Council, Planning Economy & Performance	LPPO1237	15.6	Comment	The text here refers to Severn Trent Water's assumptions of increasing efficiency, but it is unclear how these relate to the proposed WFLP policy 15A. Will STW's anticipated reductions be achieved through national measures (e.g. Building Regulations), local measures (e.g. WFLP requirements) or simply by customer education and awareness about the need to use water more efficiently?	Comments are noted. Paragraph 15.6 to be deleted from reasoned justification.
North Worcestershire Water Management	LPPO904	15.8	Comment	'borough' should read 'district'	Amendment agreed and will be actioned. ACTION – In para 15.8 on page 98, change the word 'borough' to district'.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
North Worcestershire Water Management	LPPO905	15.9	Comment	I agree that phasing development across the course of the plan will allow STW and other key infrastructure providers to incorporate necessary improvements into their delivery plans ensuring key infrastructure is in place in advance of development. I would very much welcome phasing all development across the course of the plan, progressively meeting the 5-year land supply requirement, to prevent that easy to develop sites will be developed first and the difficult sites (often Brownfield ones) will be left undeveloped.	Comments are noted.
Worcestershire County Council, Planning Economy & Performance	LPPO1238	15.12	Comment	We question whether "strategies" is the right word to begin the first sentence. "Measures" may be a more appropriate alternative.	Agree with this suggestion. "Strategies" will be changed to "measures". ACTION – In para 15.12, page 98, change "strategies" to "measures" at the beginning of first sentence.
North Worcestershire Water Management	LPPO906	15.12	Comment	This paragraph refers to the appropriate number of treatment stages. The 'number of treatment stages' is somewhat outdated and ambiguous. I would therefore prefer to replace this sentence 'In order to address surface water the appropriate number of treatment stages set out in the CIRIA SuDS Manual (2015) should be provided as part of the development' with: "To protect the receiving water environment developers are required to set out how surface water from the development will be treated sufficiently, using the simple index approach included in the CIRIA SuDS Manual (2015)."	Agree with this suggestion. Paragraph 15.12 will be updated to reflect this change. ACTION – update para 15.12 on page 98 as suggested.

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North Worcestershire Water Management	LPPO910	15.16	Comment	Developments will also be required to make allowances for future development for example the hard surfacing of previously green areas such as gardens, in the design and capacity of drainage systems	Agree with suggested changes. Amendment will be made.
	LPPO461	15.13	Comment	Watercourse on the Stone Hill North area has a high water table and in parts are water meadows. Are these areas going to remain and if so how do you intend to achieve adequate drainage within this area that allows the special habits for the local fauna and flora, indigenous insects, birds and animals? What is to happen to the water Meadows around the Stone Hill North OC/13N proposed develop including the stream?	Comments are noted.
	LPPO459	15.18	Comment	Land at the rear of Baldwin Road is considerably higher than the rest of the area. If this is covered with concrete and tarmac where will the excess surface water drain to, especially in the event of a flash flood. The slope of the field could mean flooding in our gardens	Comments are noted. All new development will require a suitably designed drainage system in order to mitigate the risk of surface water and overland flooding both on and off the site.
	LPPO1727	New Road, Far Forest BR/RO/7	Object	Objects for the following reasons: <ul style="list-style-type: none"> • Sewerage issues. 	Objection is noted. Infrastructure is a key issue that is being addressed through the Infrastructure Delivery Plan (IDP). Further work on the IDP is in progress and ongoing discussions with the local water authorities are being had as part of this process.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Canal & River Trust	LPPO1016	Policy 16A	Comment	Land stability is a material planning consideration (paras. 120-121 NPPF plus detail in NPPG). Planning system has a role to play in minimising risk and effects of land stability. NPPF is clear that planning decisions should ensure new development is appropriate for its location and that a site is suitable for its new uses taking account of ground conditions and land instability. This should be clearly reflected in this policy.	Comments are noted. We will refine Policy 16A to make it clearer the importance of land stability.
Environment Agency	LPPO1188	Policy 16A and site allocations	Comment	Potential site allocations should be assessed with regards to previous use. FPH/1 Settling Ponds is partly on a historic landfill site as is LI/6/7 Lickhill Road. We would expect a review of groundwater vulnerability and SPZs (particularly SPZ1) and information on Water Framework Directive to inform selection.	Comments are noted. Site FPH/1 was included in the Preferred Options Plan but further consideration of this site is required as the Plan progresses. The final site selection will be made available at Pre-Submission stage.
Wyre Forest District Council - Development Control	LPPO1210	Policy 16A	Comment	On matters of pollution, and subject to response from WRS, there may be an opportunity to identify possible methods of improving pollution (e.g. Electric charging points to facilitate electric cars, etc)	Comments are noted. The suggestion of 'electric charging points' is more appropriate for Policy 24B - Renewable and Low Carbon Energy.
Worcestershire County Council, Planning Economy & Performance	LPPO1239	Policy 16A	Comment	Pollution and land instability seem unrelated, so it is unclear why they have both been included in the same policy. Part B refers to land contamination, which has obvious links to pollution, but land instability is a wholly distinct issue and including it here does not seem appropriate.	Comments are noted. The NPPF refers to pollution and land instability together.
Taylor Wimpey West Midlands	LPPO1543	Policy 16A	Comment	No comments.	No comment necessary.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	LPO5106	Pollution and air quality	Comment	If the general plan is to create improvements to air quality then the central area around the Town Hall should have been pedestrianised only, not dual purpose with cars and buses. As the car parking is limited, with many people resorting to using the car-parks at the supermarkets or Weavers Wharf, why is the use of Park and Ride not more widely used? Indeed Park and Ride with a full bus timetable created at strategic centres of population would enable and encourage people to avoid taking their cars into town and would establish a town centre free from toxic traffic congestion. This could be the first step towards the Government's aim of eliminating petrol and diesel vehicles by 2040. Furthermore this would provide the opportunity to make our roads and cycle paths more receptive to walking or cycling in to town and eliminating especially the dangerous and unsavoury ring road underpass at the bottom of Comberton Hill.	Comments noted.
	LPO1720	New Road, Far Forest BR/RO/7	Object	Objects on the following reasons: <ul style="list-style-type: none"> The road is a narrow road and if vehicles are parked this causes traffic to a halt, there is no area half way to top for this to be widened. 	Objection is noted.
The Coal Authority	LPO1028	Policy 16A , para.16.21	Support	Wyre Forest's mining legacy is predominantly in SW of district where there is no major development proposed. Welcome acknowledgement at Para.16.21 that where development is proposed in areas with a	Support and comments are noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				known legacy of minerals extraction, the developer will be expected to assess the site for ground contamination, ground stability and mining hazards and submit appropriate mitigation reports in support of their planning application.	
Worcestershire Wildlife Trust	LPPO1068	Policy 16A	Support	Support this policy and in particular the weight it gives to protecting biodiversity from pollution.	Support and comments are noted. Policy 16A will be refined further to include these suggested changes.
Environment Agency	LPPO1183	Policy 16A	Support	The Wyre Forest district overlies a principal aquifer of regional strategic importance in terms of water supply and there are a number of Source Protection Zones (SPZs) to protect public water resources. With potential for contamination on brownfield sites we support remediation to reduce impact to controlled waters. Suggest that Section B could include reference to need for site investigation, remediation and validation to show that land contamination issues have been fully addressed. Supporting text should make reference to EA Groundwater Position Statements to help provide appropriate control measures, especially in SPZ1 areas. Suggest Worcestershire Regulatory Services is consulted in relation to human health considerations.	Support and comments are noted. Policy 16A will be refined further to include these suggested changes.
Worcestershire County Council, Planning Economy & Performance	LPPO1241	Policy 16B	Comment	We welcome the inclusion of Policy 16B (Minerals). To accord with the requirements of national policy and to assist in the implementation of this policy, we suggest some adjustments to the policy and supporting Reasoned	Comments are noted and welcomed. The suggested policy amendments will be considered as we progress with the Plan.

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				<p>Justification.</p> <p>Policy 16B could be strengthened by requiring applicants to assess the potential impacts on both mineral resources and minerals infrastructure. We suggest the following amendments to policy 16B to address this:</p> <p>"1. Proposed development in Minerals Consultation Areas will be required to assess the potential for the proposed development to sterilise locally or nationally important mineral resources, or impact on the operation of permitted mineral sites or supporting infrastructure the scope for minerals extraction before development takes place. Planning permission will not be granted for non-mineral development that would lead to the unnecessary sterilisation of mineral resources or unacceptable impacts on the operation of permitted minerals sites or supporting infrastructure within a Minerals Safeguarding Area (MSA) unless:</p> <p>a. The applicant can demonstrate that the mineral concerned is no longer of any value or potential value, or the supporting infrastructure is no longer necessary; or</p> <p>b. The mineral can be extracted satisfactorily prior to the development taking place; or</p> <p>e b. The development is of a temporary nature and can be completed and the site restored to a condition that</p>	

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				<p>does not inhibit extraction within the timescale that the mineral is likely to be needed; or</p> <p>c. Where sterilisation of a locally or nationally important mineral resource could occur, opportunities for extraction of the resource will be optimised;</p> <p>or</p> <p>d. Where permitted mineral sites or supporting infrastructure could be compromised, sufficient mitigation measures will be put in place to ensure their continued operation.</p> <p>2. Developers will be encouraged to recycle and reuse construction waste onsite and use substitute or secondary and recycled minerals within development."</p> <p>To support these changes, we would recommend including the following text within the Reasoned Justification:</p> <ul style="list-style-type: none"> • Development can "sterilise" mineral resources (make them inaccessible for potential extraction) or prejudice the operation of minerals sites and supporting infrastructure. This can be either directly, for example by building over land that contains minerals; or indirectly, for example though the introduction of sensitive 	

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				<p>land uses in close proximity to these resources or sites.</p> <ul style="list-style-type: none"> • In order that Worcestershire's limited natural resources are used prudently, planning applications within Mineral Consultation Areas should be accompanied by a Minerals Resource Assessment which evaluates how to optimise opportunities for extraction of any locally or nationally significant mineral resources. This should take a sequential approach to considering the following possible outcomes: <ol style="list-style-type: none"> 1. Extracting all of the resource within the proposed development site and in the area which would potentially be sterilised by the development, either in advance of development taking place or in phases alongside the development; 2. Where extracting all of the resource would prevent a suitable landform for subsequent development, consider whether a proportion of the resource could be extracted; or <p>As a last resort if neither (1) nor (2) is possible, consider whether any opportunities exist for "incidental recovery of the mineral resource".</p> <ul style="list-style-type: none"> • Permitted mineral sites and the supporting infrastructure of existing potential storage, handling and transport sites are important to 	

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				<p>delivering a steady and adequate supply of mineral resources in Worcestershire, and it is therefore important that they are not adversely impacted by sensitive or inappropriate development that would conflict with the use of sites identified for these purposes.</p> <ul style="list-style-type: none"> • Different types of development may or may not conflict with the use of the mineral site or supporting infrastructure. The potential for conflict is a function of both the sensitivity of the land use or receptors at the proposed development and the techniques or processes employed at the minerals or infrastructure site. Applicants will need to assess whether the normal operation of the mineral site or supporting infrastructure could have adverse impacts on the proposed land use or any users of the proposed development. This should include consideration of issues such as (but not limited to) any noise, vibrations, dust, or fumes that may result from the normal operation of the site, and could lead to complaints which could jeopardise the continued operation of the mineral site or supporting infrastructure. Techniques such as considered design, site layout and landscaping or screening of the proposal may in some cases be adequate to mitigate any impacts. <p>Footnote 11 in part 1 of Policy 16B refers to exempt</p>	

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				<p>development. We support the concept of exempt development in order to avoid creating an unnecessary barrier to types of development which are unlikely to cause needless sterilisation of minerals, but we have some concerns over the definition included in Footnote 11. A number of exemptions were proposed in paragraph 8.4 of the recent Third Stage Consultation on the Minerals Local Plan. These have not yet been tested at examination but provide a more comprehensive list of exemptions. We would suggest that footnote 11 could include a caveat so that it reads: "Excluding 'exempt development', namely householder applications; development already allocated in the Local Plan; infilling in existing built-up areas; or as defined in the Minerals Local Plan".</p> <p>We also have a slight concern over "development already allocated in the Local Plan" being totally exempt from mineral safeguarding requirements. We consider that mineral safeguarding needs to be considered in the selection of sites, and it may be the case that some sites will need to consider mineral safeguarding and prior extraction but can still be allocated for future development. This is discussed further in relation to site allocations below.</p> <p>Worcestershire County Council is currently taking into account comments on the Third Stage Consultation on the Minerals Local Plan, including those from Wyre Forest</p>	

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				<p>District Council. We would welcome continued engagement in developing the mineral safeguarding policies in the emerging plan and for these to align as closely as possible with the requirements in the Wyre Forest Local Plan.</p> <p>We were pleased to have the opportunity to provide comments at an early stage during informal consultation on the potential site options. The table at Appendix 1 highlights cross-over between minerals safeguarding considerations and the proposed site allocations.</p> <p>Coal</p> <p>Paragraph 16.19 refers to coal extraction. Whilst there are some coal deposits in the western parts of Wyre Forest, the Coal Authority no longer classifies these as a "surface coal resource" that is likely to attract further interest. However, former workings have left a legacy of mining features and hazards in parts of Wyre Forest district which are locally significant and may cause issues of land stability. We would recommend that you contact the Coal Authority to ensure you have the latest data, and that these areas are shown on the Proposals Map and referenced in the Reasoned Justification supporting policy 16A (Pollution and Land Instability).</p> <p>Mineral Resource Consultation Areas</p>	

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				<p>WCC (as the Minerals Planning Authority) is not seeking the removal, on safeguarding grounds, of those proposed WFLP sites that fall within the adopted MLP's Mineral Consultation Areas or the emerging MLP's proposed Mineral Resource Consultation Areas. Similarly, WCC does not require full extraction to take place ahead of any proposed development. Based on the assessed need for housing and employment land in Wyre Forest District, we believe that there is a strong argument that the need for the non-mineral development (housing and employment land) which needs to be provided through site allocations in the Local Plan is such that it outweighs the long-term economic value of the mineral resource.</p> <p>However, opportunities should still be optimised for partial extraction or incidental recovery of the resource, either in advance of development taking place or in phases alongside it.</p> <p>We consider that this requirement should be highlighted as part of the site allocation information and the exemption either removed from or amended in footnote 11 in Policy 16B. A minerals resource assessment should be required for all sites within Mineral Consultation Areas to inform design at outline planning stage. Consideration from the outset could offer opportunities to integrate partial extraction as part of ground works for footings, landscaping, SuDS schemes, integration of physical features and green infrastructure in the overall site</p>	

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>design.</p> <p>Mineral Infrastructure Consultation Areas</p> <p>The allocation of WFLP sites within the proposed Mineral Infrastructure Consultation Areas is not necessarily precluded, but consideration needs to be given as to whether the potential development would result in an unacceptable impact on the continued operation of the relevant supporting infrastructure or the successful restoration of the minerals site. Different types of development may or may not conflict with the use of the mineral site or supporting infrastructure. The potential for conflict is a function of both the sensitivity of the land use or receptors at the proposed non-exempt development and the techniques or processes employed at those sites.</p> <p>In considering whether to allocate WFLP sites within these consultation areas, we consider that Wyre Forest District Council will need to assess whether the normal operation of the mineral site or supporting infrastructure could have adverse impacts on the proposed land use or any users of the proposed development. This should include consideration of issues addressed in the Development Management policies of the draft Minerals Local Plan, including but not limited to any noise, vibrations, dust, or fumes that may result from the normal operation of the site, and could lead to</p>	

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>complaints which could jeopardise the continued operation of the mineral site or supporting infrastructure if potential impacts are not considered in advance.</p> <p>It may be possible to mitigate any potential impacts through measures such as considered design, site layout and landscaping or screening of the proposal. Any necessary measures could be set out as part of the site allocation policies. If mitigation measures would not be sufficient to prevent an unacceptable impact on the continued operation of the batching plant or the restoration of the minerals site, then the potential site should not be allocated.</p> <p>We would be happy to engage in further discussion on this as required.</p> <p>Potential Mineral Site Allocations</p> <p>Whilst none of the MLP potential site allocations overlap with the potential WFLP sites, some are in close proximity. We would welcome further discussion on how to resolve any potential issues of sterilising mineral resources or negatively impacting on potential mineral sites through the introduction of additional sensitive receptors in close proximity, as well as the potential impact of any mineral development on the potential housing/employment allocations.</p>	

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				However, depending on when these developments come forward, there may be potential for any mineral resources excavated during the development of these sites (as required for mineral safeguarding purposes) to be processed at these potential minerals sites, and/or for the minerals sites to supply building materials for the developments.	
Gladman Developments Limited	LPP01387	Policy 16B	Comment	<p>Intention to safeguard minerals in number of consultation areas is noted.</p> <p>Para.143 NPPF - LPAs should set out local plan policies to encourage prior extraction of minerals where practicable and feasible it is necessary for non-mineral development to take place. Gladman consider that this requirement needs to be balanced against competing development needs. A positively framed mineral safeguarding policy will therefore be required that enables the local planning authority to reach suitably balanced judgements on the positive or negative effects of a non-minerals development alongside other policy considerations contained within the local plan as a whole, including the emphasis to significantly boost the supply of housing and the spatial strategy that will shape the focus for this locally.</p>	Comments are noted.
Taylor Wimpey West Midlands	LPP01544	Policy 16B	Comment	No comments.	No comments necessary.
Taylor Wimpey	LPP01545	Policy 16C	Comment	No comments.	No comments necessary.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
West Midlands					
Worcestershire County Council, Planning Economy & Performance	LPPO1240	Policy 16C	Support	<p>We fully support Policy 16C and the supporting Reasoned Justification in paragraphs 16.22 to 16.29.</p> <p>Safeguarding Waste Management Development</p> <p>There are a significant number of operational waste sites within Wyre Forest district. Some are seen as relatively low-value land uses and could therefore be vulnerable to redevelopment for other uses. Relocating a waste management operation can be difficult, therefore existing facilities should be safeguarded from development of non-waste related uses. Policy WCS 16 of the Waste Core Strategy seeks to safeguard these existing facilities and a web-map is available showing the sites and the 250m policy buffer around them: http://gis.worcestershire.gov.uk/website/WasteCoreStrategy/</p> <p>It is unlikely that this will be a significant factor in deciding between the two spatial options, but the relationship between the new and existing land uses should be considered before allocations are made or new permissions are granted. Any potential impacts should be considered in advance and included in any guidance on the design and development of the site allocations. This would mean that it will usually be possible to minimise conflict between the existing waste management facility</p>	Support for Policy 16C is noted.

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				and the proposed development.	
	LPPO453	16.3	Comment	Dust, light, noise, fumes and smell will have detrimental impacts on the environment and quality of life. This is relevant to all the options concerning the development to the East of Kidderminster	Comments are noted. Policy 16A is a specific policy for pollution. Pollution is a material planning consideration and development proposals must be designed in order to avoid any significant adverse impacts from pollution.
	LPPO3698	16.3	Object	16.3 Pollution will increase as you build on Green Belt and field. You do not say how you propose to deal with the threat of increased pollution.	Objection is noted. Policy 16A is a specific policy for pollution. Pollution is a material planning consideration and development proposals must be designed in order to avoid any significant adverse impacts from pollution.
Worcestershire County Council, Planning Economy & Performance	LPPO1132	16.6	Comment	This paragraph states that adoption of the new Minerals Local Plan for Worcestershire is anticipated in late 2018. Please note that a revised Minerals and Waste Local Development Scheme has been approved by Worcestershire County Council, and adoption of the Minerals Local Plan is now anticipated in spring 2020.	Comments are noted. The relevant text will be updated in paragraph 16.6.
Wyre Forest Friends of the Earth	LPPO1322	16.28	Support	WFFoE support this policy of larger sites having onsite waste treatment such as composting or anaerobic digestion as part of a district heating scheme.	Support for Policy 16C and para 16.28 is noted.
Wyre Forest Green Party	LPPO1471	16.28	Support	We support this policy of larger sites having onsite waste treatment such as composting or anaerobic digestion as	Support for Policy 16C and para 16.28 is noted.

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				part of a district heating scheme.	
Historic England	LPPO1280	Minerals	Comment	<p>On the section under Minerals, we would recommend including some information about the issues for the historic environment and the need to protect and conserve heritage assets, as a result of proposed minerals development. Undesignated archaeology can be a particular issue in minerals development. Historic England also has some advice regarding restoration of minerals sites and how it can be achieved to benefit the historic environment. We are currently preparing updated advice on minerals development and the historic environment and would be happy to share this with you when it is available.</p> <p>Additionally, we support minerals development, in appropriate locations, where local building stone is being mined that can be used for the repair of historic buildings.</p>	<p>Comment on minerals noted.</p> <p>Add a new section to Policy 16B 1d to read:</p> <p>"Restoration of minerals extraction sites which impact on heritage assets or their settings should be appropriate to the maintenance of and the significance of those assets".</p>
	LPPO1709	New Road, Far Forest BR/RO/7	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> • Traffic. • Pollution. 	Objection is noted.

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Company / Organisation	Response Number	Para/Policy	Type of Response	Summary of Response	WFDC Officer Response
Wyre Forest District Council - Development Control	LPP01211	Policy 18A	Comment	This isn't just about Affordable Housing, but rather it is about the wider potential S106 Obligations (e.g. Open space, education, etc). Many potential contributions could render a scheme unviable so, notwithstanding the previous policy wording, to restrict the policy to just affordable housing appears flawed.	This is specifically under a section regarding affordable housing requirements but will ensure consistency throughout the wider document regarding viability.
Persimmon Homes Limited	LPP01436	Policy 18A and RJ	Object	Not appropriate for the Council to secure payment for viability assessments via a development plan policy. Council charges are the subject of separate legislation. Strongly object to the suggestion in paragraph 18.3 that the Council should obtain planning gain. There is no basis in national policy for this approach. Payments required of developers and landowners should only be sought as part of mitigation of any unacceptable impacts arising from development.	WFDC will follow the government's guidance on viability testing at plan stage and on s106 contributions and will update its planning policies once this has been published.
Worcestershire County Council, Planning Economy & Performance	LPP01244	Policy 18B	Comment	This policy states that " <i>Small scale residential developments on infill plots within the settlement boundaries of the three main towns and the villages will be encouraged provided that they contribute to the existing character of the area in terms of design, density and layout</i> ". Infill proposals have the potential to harm the character and form of historic areas, and policies regarding infill development should be more specifically linked to policies that seek to preserve the existing character of an area, in order to avoid or minimise risk of conflict at an early stage in the planning process. Sub-sections (i) to (iv)	ADD POLICY 18B v. v. Where proposals for infill development are sited within or adjacent to heritage assets, they must accord with Historic Environment Policies 11B and 26; also Policy 27A Quality Design and Local Distinctiveness.

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				of policy 18B contain no mention of conservation areas and historic character, etc. and would be better linked or referenced to policy 11B - Historic Environment. In particular, subsections A and B of policy 11B could be referenced, including items (i), (iii), (vi), (vii), (viii) and (ix), as well as policy 27A - Quality Design and Local Distinctiveness, subsections A and B including items (ii) and (iv).	Reasoned Justification: 18. Inappropriately sited and designed infill development has potential to harm the form, character and setting of Conservation Areas and other heritage assets.
Gladman Developments Limited	LPPO1388	Policy 18B	Comment	Note intention to enable residential infill development within settlement boundaries that will be set through Local Plan. Also consider that there are sustainable development opportunities adjacent to settlement boundaries. Plan needs to have flexibility built in to allow such sites to come forward if required to help with housing land supply.	Comments noted.
Bournewood Nurseries	LPPO1965	Infill Development	Comment	It is noted that the current policy drafting stated an intention to enable residential infill development within defined settlement boundaries. Development boundaries are often tightly drawn around a settlement. The policy should include some flexibility and allowance for consideration of sites on their individual merits and also reflect the opportunities available through sites, such as Bournewood Nurseries, can still allow development in sustainable locations. Such flexibility would also allow the LPA to respond to changes required in housing supply across the plan period.	Comments noted. Settlement boundaries are being considered in Rock Parish as part of the Local Plan Review.
	LPPO2196	Policy 18B	Comment	The wholesale 'garden land' restriction that has been	The garden land restriction is

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				<p>hitherto adopted by WFDC is a wholly inflexible and not tailored to the site in question. It has been applied on a 'blanket' basis.</p> <p>An infill proposal should be considered where it can be accommodated within the existing built environment and on its own merits.</p> <p>There are also infill plots available within the countryside/Green Belt that may be worthy of consideration to alleviate the pressure for quality housing to attract external residents to support and contribute to the local economy.</p> <p>There needs to be inward migration from the Birmingham area to improve social demographics all round and provide the ambient choice of housing and location.</p>	being lifted allowing development on non PDL where it meets the infill policies.
	LPPO2827	Policy 18B	Comment	I do not object to this small scale residential development on infill plots.	Comments noted.
	LPPO2932	Policy 18B	Object	<p>The Local Plan Review should have clearer and more ambitious policy objectives.</p> <p>NPPG indicates sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment. It would be appropriate to include 'gain' in policy 18B and its Reasoning Justification. Surely the Council wants more for its community beyond 'sufficient</p>	

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Company / Organisation	Response Number	Para/Policy	Type of Response	Summary of Response	WFDC Officer Response
				separation' and 'satisfactory car parking';	
	LPPO625	Policy 18B	Support	Support for Policy 18B - residential infill development.	Support is noted.
Bewdley Civic Society	LPPO857	Policy 18B Residential Infill Development	Support	Support for Policy 18B.	Support is noted.
Chaddesley Corbett Parish Council	LPPO1044	Policy 18B	Support	We support this policy.	Support is noted.
Miller Homes	LPPO986	Policy 18C	Comment	<p>Space standards should be left to developers to determine in line with market requirements. Wish to reserve final comment on the appropriateness of introducing National Space Standards into the District as a policy requirement within the new Local Plan until the "further evidence" being gathered by Wyre Forest District Council (WFDC) to justify the inclusion of this Policy requirement, including an analysis of recently completed housing, has been undertaken to inform the next stage of Local Plan consultation.</p> <p>The National Planning Policy Framework (NPPF) states² that:</p> <p><i>"Local planning authorities should set out their policy on local standards in the Local Plan, including requirements for affordable housing. They should assess the likely cumulative impacts on development</i></p>	Comments noted and it is our intention for this policy to outline the specific case for WFDC.

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				<p><i>in their area of all existing and proposed standards, supplementary planning documents and policies that support the development plan, when added to nationally required standards. In order to be appropriate, the cumulative impact of these standards and policies should not put implementation of the plan at serious risk, and should facilitate development throughout the economic cycle. Evidence supporting the assessment should be proportionate, using only appropriate available evidence”.</i></p> <p>The Housing Standards Review introduces a new national space standard, this has not been incorporated into the Building Standards and is not a requirement. National housebuilders have a vested interest in building products that meet market needs, which will sell and which are viable to build. The policies in the new Local Plan should be sufficiently flexible to allow this to happen without adding a prescriptive policy burden. If the market demands space standards in line with the optional national standards, then it is more likely that developers will deliver these. These considerations all form part of the need to take account of ‘market signals’, as required by the NPPF.</p> <p>The NPPF makes it clear that each local planning authority should ensure that their Local Plan is based on adequate, up-to-date and relevant evidence. The</p>	

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				<p>new Local Plan should therefore only require developers to meet the National Space Standards if WFDC can justify this requirement by taking account of need (evidence provided on the size and type of dwelling currently being built in the area), viability (consideration of the impact of adopting the space standards as part of the Plan’s viability assessment) and timing (potential need to factor in a reasonable transition period following adoption of a new policy on space standards to allow developers to factor this into future land acquisitions), in accordance with the requirements of the Planning Practice Guidance (PPG)</p>	
Gladman Developments Limited	LPPO1389	Policy 18C	Object	<p>Concerned with proposed introduction of enhanced technical standards. Where is justification for this in terms of need, viability and impact on affordability? A local assessment must be provided to justify this policy.</p>	<p>Comments noted and it is our intention for this policy to outline the specific case for WFDC.</p>
Chaddesley Corbett Parish Council	LPPO1043	Policy 18C	Support	<p>Pleased to see reference to national space standards</p>	<p>Support is noted.</p>
Wyre Forest Community Housing	LPPO1679	Policy 18C	Support	<p>We would support the District Council in deciding whether the Nationally Described Space Standards apply to all new homes or to none.</p> <p>Our own work relating to standard house types broadly adopted the approach of meeting Building Regulations 2010 Requirement M4 (1): Category 1 - Visitable Dwellings.</p>	<p>Comments noted.</p>

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Company / Organisation	Response Number	Para/Policy	Type of Response	Summary of Response	WFDC Officer Response
Bewdley Civic Society	LPPO858	Policy 18D Flat Conversions	Support	Support for Policy 18D.	Support is noted.
	LPPO3705	Policy 18E	Object	<p>18 E You describe what you see as an acute housing shortage in the region and demand for housing. However please see comments as to why this is disputed.</p> <p>However it appears that the need for mobile homes and holiday homes overrides this requirement. You quote that they are temporary in nature but there are many very large permanent mobile home parks with year round use in Stourport. Lickhill manor, 65 acres Severnside.</p> <p>Your plan is contradictory in nature.</p>	<p>The identified need for housing has been undertaken through a standard approach to assessing housing needs and so we are satisfied we can demonstrate a need for housing. Please see the technical evidence base.</p> <p>The caravan parks within Wyre Forest are temporary with two exceptions; Kinverdale and Severn Bank.</p>
Bewdley Civic Society	LPPO859	Policy 18E Residential Caravans and Mobile Homes	Support	Qualified support. The policy should allow caravans/chalets for personal circumstances as annex accommodation. Their standard of construction in not necessarily inferior.	Support noted.
Campaign to Protect Rural England	LPPO940	Policy 18E	Support	much stronger wording than previously in Core Strategy. Policy should be expanded to cover existing mobile home/caravan sites with 11 month occupancy and cross referenced to 23C and 28B.	The policy is the same as the SAAP it will apply to new developments and not existing.
	LPPO1704	Plough Lane, Far Forest	Object	<p>Objects on the following reasons:</p> <ul style="list-style-type: none"> Change skyline – overlooking onto existing 	Objection is noted.

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				properties.	
	LPPO1770	New Road, Far Forest BR/RO/7	Object	<ul style="list-style-type: none"> Skyline change; this would be dramatically effected with my current views of the countryside. 	Objection is noted.
	LPPO627	18.13	Support	Support for paragraph 18.13.	Support is noted.
	LPPO3920	Paragraph 18.13	Support	I support the intensification statements within the paragraphs 18.13 – 18.16.	Support and comment is noted.
	LPPO3922	Paragraph 18.14	Support	I support the intensification statements within the paragraphs 18.13 – 18.16.	Support is noted.
	LPPO3923	Paragraph 18.15	Support	I support the intensification statements within the paragraphs 18.13 – 18.16.	Support is noted.
	LPPO3924	Paragraph 18.16	Support	I support the intensification statements within the paragraphs 18.13 – 18.16.	Support is noted.
	LPPO1730	New Road, Far Forest BR/RO/7	Object	<p>Objects for the following reasons:</p> <ul style="list-style-type: none"> Impact on wildlife and habitats. 	Objection is noted.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 19: PROVIDING ACCOMMODATION FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	LPPO3374	Travelling Show People	Comment	Sites for 'travelling show people'. Confine next to 'existing gypsy & traveller sites' on Sandy Lane Industrial Estate.	This requirement is for a Travelling Showpeople site and not for Gypsy and Travellers pitches.
	LPPO895	Policy 19	Comment	<p>Policy 19 – Site Standards for Gypsies, Travellers and Travelling Showpeople</p> <p>Whilst we support the inclusion of a Policy dealing with site standards for Travelling Showpeople, we believe that the Policy should identify the difference between pitches (Gypsies and Travellers) and plots (Travelling Showpeople). Under the PPfTS, Pitches and Plots are defined and for Travelling Showpeople a Plot is a mixed use which needs to incorporate space or to allow individual plots to be split to allow the storage of equipment on part of the plot and areas for the stationing of Showman’s caravans for residential occupation.</p>	Comments noted. We will consider separating the policy.
	LPPO1693	Policy 19	Object	<p>Clows Top site NOT suitable for travelling show people.</p> <ul style="list-style-type: none"> • Poor infrastructure on approach. • Traffic already heavy • Better sites available • No similar Sites nearby • Poor water pressure. • Policy 35 land at Clows Top (BR/RO/I) is recommended as core site in a rural village. 	Objection and comments noted. This site was considered for one specific family of Travelling Showpeople who are currently resident in the District. This differs from requirements for Gypsy and Traveller sites.
	LPPO1780	BR/RO/1	Object	Objects to all aspects of proposal to locate travelling show	Objection and comments noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>people in Clows Top. The A456 to brow of hill where access to site is situated is a bottleneck for trucks and a fast road for all others. The footpath opposite has been ruined by trucks already turning in and out.</p> <p>The B4202 has become a fast approach to the cross roads.</p> <p>Will visual impact opposite houses in the highest village in Worcestershire be spoilt by this action?</p> <p>The LPR calls for housing to fill the shortfall. Clows top in Policy 35 is designated as a “CORE” site for houses BR/RO/1</p> <p>The plan of this area is incorrect at this time Planning to correct.</p> <p>Should not dominate the nearest settled community CLOWS TOP.</p> <p>Concerned that once site opened up, others may move in without permission.</p>	<p>This site was one of 5 under consideration for a specific Travelling Showpeople family.</p>
	<p>LPPO1784</p>	<p>WA/BE/6</p>	<p>Object</p>	<p>Objects to travelling showpeople site on Habberley Road.</p> <p>Concerned about traffic around the safari park as it's already very busy.</p> <p>Concerned about mess that may be left on the site.</p>	<p>Objection and comments noted.</p> <p>This site was one of 5 under consideration for a specific Travelling Showpeople family.</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				Suggests brownfield sites as an alternative, e.g. the deserted timberworks on Park Lane and other brownfield sites where factories have been demolished.	
	LPPO1790	WA/BE/6	Object	<p>Objects to Habberley Road Site due to:</p> <ol style="list-style-type: none"> 1. Impact on tourism in Bewdley, concerned about locating a travellers site on the edge of town opposite the largest hotel in the area 2. The site is of historic and archaeological value. Questions why a previous small business was stopped from trading there when the business did not harm the land but now it is seen as acceptable to have several tonnes of hardcore laid and a yard full of fairground rides. 3. The site is Green Belt. 4. The site is close to Habberley Valley again a spot in your plan which you wish to promote in the area. 5. The road infrastructure is not sufficient. <p>Suggests the site next to Ceramaspeed as a location with more suitable road infrastructure.</p>	Objection and comments noted.
	LPPO1809	WA/BE/6	Object	<p>Objects to Habberley Road Site:</p> <p>With houses having to be built in the near future this is a stupid and ridiculous proposal.</p>	Objection and comments noted.
	LPPO1810	WA/BE/6	Object	Objects to WA/BE/6 Habberley Road Site due to the	Objection and comments noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>following reasons:</p> <ol style="list-style-type: none"> 1. B4129 is a very busy road and vehicles going in and out of this area would cause traffic issues. 2. Concern about wildlife in this area. 3. Potential ancient burial mound. 	
	LPPO1817	WA/BE/6	Object	<p>Believes that this site goes against previous planning advice</p> <p>Heavy vehicles = Highways issues</p> <p>Personal perception that if the site is open to all travelling people there may be potential damage to local business and the local environment. They also believe that it may lead to possible reduction in property values.</p>	<p>Objection and comments noted. This site was considered for one specific family of Travelling Showpeople who are currently resident in the District. This differs from requirements for Gypsy and Traveller sites.</p>
	LPPO1852	WA/BE/6	Object	<p>Habberley Road Site:</p> <ul style="list-style-type: none"> • Against previous planning advice • Open to all travelling show people • Potential damage to local business • Highways issues • Damage to local environment 	<p>Objection noted. This site was considered for one specific family of Travelling Showpeople who are currently resident in the District. This differs from requirements for Gypsy and Traveller sites.</p>
	LPPO1982	WA/BE/6	Object	<p>Objects to potential site for travelling show people,</p>	<p>Objection and comments noted. This site was one of 5 under</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>Habberley Road, WA/BE/6</p> <p>Believes that the site is not required as there are adequate fun-fair facilities in the area at the Safari Park. Concerned that the site may become a potential eyesore and health and safety risk.</p> <p>Personal perception that the site may not be popular with local community.</p> <p>Believes that there are plenty of brownfield sites that are available, both industrial and commercial.</p>	<p>consideration for a specific Travelling Showpeople family.</p>
	<p>LPPO2479</p>	<p>Policy 19 Travelling Show People</p>	<p>Object</p>	<p>Believes that the site goes against all previous planning advice.</p> <p>The site will be open to all travelling show people/travellers causing constant movement of traffic on and off the site.</p> <p>The B4129 is a rural road which has become busy over the years and with the potential extra traffic, will make it a very dangerous road with accidents waiting to happen.</p> <p>Personal perception that the hotel and golf club will suffer, causing damage to their businesses.</p> <p>Perception that there may be damage to the local environment and wildlife will suffer.</p>	<p>Objection and comments noted. This site was considered for one specific family of Travelling Showpeople who are currently resident in the District. This differs from requirements for Gypsy and Traveller sites.</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				Believes that some of the residents who live on this road will be affected by the noise and their houses will become hard to sell if they ever want to move on.	
	LPPO2772	Policy 19	Object	<p>We would like to bring to your attention that - perhaps unintended - the emerging policies 8F and 19 appear to be watered down in formulation compared to the equivalent prevailing policies SAL.DPL9 and SAL.DPL10 (titled: Wyre Forest District Council Site Allocations and Policies Local Plan 2006-2026 - Adopted July 2013).</p> <p>Policy 8F</p> <p>As Traveller, Travelling Showpeople, and Gypsy sites are essentially a residential use, the same requirements that apply for residential use, such as appropriate sewage and drainage arrangements, must also be met for this use. However, emerging policy 8F paragraph 8.40 suggests that applicants will only be required to demonstrate they have sought a connection to the mains foul sewer in the first instance and therefore the present wording seems to imply that appropriate sewage/drainage measures to residential standards do not necessarily need to be provided for this purpose.</p> <p>Policy 19</p> <p>Furthermore, it appears to us that the emerging planning permission policy (19) for Traveller, Travelling Showpeople,</p>	Objection and comments noted.

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				<p>and Gypsy use on land that is not currently allocated for this use is much less strictly formulated than the equivalent prevailing policies as certain requirements to balance conflicting interests and to protect the interest of the settled community, such as SAL.DPL9 under i-viii and sequential test and SAL.DPL10 under part 1 sub i-viii and part 3, are not repeated in Policy 19.</p> <p>Questions:</p> <ol style="list-style-type: none"> 1. Would it not be preferable to clarify in Policy 8F that the same requirements that apply to residential development, such as appropriate drainage measures, should also be met when allocating a site for Traveller, Showpeople or Gypsy use? 2. Also, should Policy 8F not be formulated in a way that all necessary conditions should be met prior and not subsequent to such an allocation as a site can only qualify as appropriate if all requirements are met? 3. As per Policy 8F, would it not be preferable to clarify in Policy 19 that this use is predominantly residential with all its consequences? 4. Furthermore, is it not preferable to incorporate all requirements of the prevailing policies SAL.DPL9 and SAL.DPL10 in the equivalent emerging Policy 19 assuming that there is no intention to water down the current criteria in balancing conflicting interests? 	

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	LPPO2798	Clows Top	Object	<ul style="list-style-type: none"> • Site not suitable for large show vehicles due to steep hills either side of a busy crossroads especially in the winter with ice and snow. • Harmful impact on Clows Top Village Hall with regard to parking and increased traffic pulling out on cross road at brow of hill. • No mains sewage connection, the nearest being Rock village. • Visual impact on Green Belt area. • Too many caravan site already allocated in the local area. 	Objection and comments noted.
	LPPO3545	Policy 19	Object	Concerned that the council are considering the travelling showpeople community when they personally believe that it fails to address the needs of it's council tax paying residents.	Objection noted. This site was considered for one specific family of Travelling Showpeople who are currently resident in the District. This differs from requirements for Gypsy and Traveller sites.
	LPPO3872	Policy 19	Object	<p>Objects to the site based on personal perception that there may be:</p> <ol style="list-style-type: none"> 1. Damage to local environment. 2. Damage to local business. 3. Also objects based on how busy the road can already be. 	Objection and comments noted.
	LPPO4158	Policy 19	Object	Objects to the site based on personal perception that there	Objection and comments noted.

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				<p>may be:</p> <ol style="list-style-type: none"> 1. Damage to local environment. 2. Damage to local business. 3. Also objects based on how busy the road can already be. 	
	LPPO244	Policy 19	Object	<p>I object to the proposal of a Travelling Showpeople site at the Clows Top former garage. My reasons are as follows;</p> <ol style="list-style-type: none"> 1) Inadequate facilities to provide them with a good quality of life. No access to mains sewerage and no proposals to access sewerage treatment facilities. 2) The road through Clows Top is a busy one with a 30 mph limit. Access from the direction of Bewdley involves a steep hill leading into the Village. Travelling Showpeople use large lorries to transport their equipment around. If they were approaching from this direction, they would impact heavily on the steady flow of traffic and other commuters/businesses. 3) The reduced speed of their vehicles driving up the hill is likely to cause other drivers to become frustrated and overtake, placing other road users in danger. 4) As drivers reach the top of the hill into Clows Top, their view becomes restricted due to the brow. It is therefore feasible that drivers would be suddenly 	<p>Objection and comments noted. This site was one of 5 under consideration for a specific Travelling Showpeople family.</p>

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				<p>faced with these Showpeople lorries in mid manoeuvre. It increases the risk of road collisions both by colliding into the lorries, or swinging out to avoid them and colliding with oncoming traffic.</p> <p>5) Many vehicles already do not adhere to the 30mph speed limit and drive through the village at excessive speeds, in particular motorbikes passing through. The Council would be creating a site knowingly placing Showpeople and all other road users in increased danger.</p> <p>6) Many people park at the Village Hall car park and cross the road to use the Post Office/Shop and Butchers. The presence of regular additional lorries will restrict the view for motorists and pedestrians. This increases the likelihood of road collisions with pedestrians.</p> <p>7) Clows Top is highly vulnerable to inclement weather. The roads can become unusable in severe frost or snow fall. This would provide an obvious impact on travelling showpeople remaining mobile and able to earn a living.</p> <p>8) There are no community facilities for the travelling showpeople's children to play.</p> <p>9) Schools and Doctors are not within walking distance and therefore not easily accessible for the travelling community.</p>	

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	LPPO283	Policy 19 part ii	Object	<p>Policy 19 part ii states</p> <p><i>"The site layout gives adequate consideration to pedestrian safety, cycle movements and vehicle movements and provides adequate space for vehicles, towing caravans to enter, exit and manoeuvre around the site and for refuse collections."</i></p> <p>My objection to land on Wilden Top Road/Bigbury Lane being used as a site to accommodate travelling show people is based on the fact that there is no pedestrian access/footpath along either Wilden Top or Bigbury Lane.</p> <p>Furthermore the 2011 Baker Report, which initially identified this land as being suitable, is now out of date. In 2011 the report used the following as part of its criteria</p> <p><i>Access to services</i></p> <p><i>3.32 Circular 01/2006 identifies that local authorities "should first consider locations in or near settlements with access to local services, e.g. shops, doctors and schools" (para. 65). In particular, there is a need to provide easy access to GP and other health services and to ensure children attend school on a regular basis.</i></p> <p><i>3.33 Sites should have good means of access to the local highway network but in terms of the availability of transport modes, the Circular states that "local authorities should be</i></p>	<p>Objection and comments noted. This site was considered for one specific family of Travelling Showpeople who are currently resident in the District. This differs from requirements for Gypsy and Traveller sites.</p>

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				<p><i>realistic about the availability, or likely availability, of alternatives to the car in accessing local services (para. 54).</i></p> <p><i>3.34 Wyre Forest Core Strategy Policy CPO6 states that local community services and facilities should be within easy access from the site by a variety of modes of transport. In addition, there should be safe and convenient vehicular and pedestrian access and sites should be easily accessed by towing caravans.</i></p> <p>The 2011 Baker Report measured from the site on Wilden Top to the local shop as being 300 metres. Sadly the shop it refers too in the report is no longer open and closed in 2016.</p> <p>I strongly object to land on Wilden Top Road being used as a site for accommodation of travelling show people.</p>	
	LPPO440	19.1 BR/RO/1 Land at Clows Top	Object	<p>Wyre Forest policy states:-</p> <p>8.40 Whilst Gypsy and Traveller sites are essentially a residential use, sites for Travelling Showpeople differ in that they need to provide a secure, permanent base which is suitable for storage and maintenance of equipment when it is not in use. Most showpeople need to live alongside their equipment and as such sites need to be suitable for both residential and business use. Sites need to be designed in an appropriate manner which minimises any impacts on neighbouring uses and occupiers. Applicants will be required to demonstrate adequate access for their use and</p>	Objection and comments noted.

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				<p>that they have sought a connection to the mains foul sewer in the first instance.</p> <p>The comment is that there is no mains sewer to connect to in Clows Top.</p>	
	LPPO439	19.2 BR/RO/01 Land at Clows Top	Object	The entrance to this site is on the brow of the hill on the A456 in Clows Top. The entrance to the proposed site is unsighted to traffic travelling up the hill. The proposed use for travelling showpeople would involve long articulated vehicles slowly exiting/entering the site producing a traffic hazard. Also although in a 30mph zone much of the traffic exceeds this limit in both directions.	Objection and comments noted. This site was one of 5 under consideration for a specific Travelling Showpeople family.
	LPPO2670	Traveller Site Habberley Road, Bewdley	Comment	<p>I have concerns over noise, traffic, environmental and visual impact of the area.</p> <p>The proposed site is on one of the main artery's coming into the town. The fairground equipment will be seen on the main approach and opposite the hotel giving visitors their first impression of Bewdley.</p> <p>I'm concerned the noise generated by maintenance and the potential nuisance of flashing lights would effect myself and the other residents in the area. Additionally, the equipment will need to be transported by heavy diesel machines adding to the noise issue.</p> <p>The junction at Catchems End is very busy. As some of the houses at the bottom of Habberley Road have no parking,</p>	Comments noted.

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				<p>cars are often parked on 'half on and half off' the path resulting in larger vehicles not being able to get through which has the potential to cause accidents.</p> <p>I have concerns with these types of vehicles pulling out on this popular footpath. Also, the long and straight Habberley Road is (wrongly) seen as a race track 'especially for motorbikes'.</p> <p>Equipment located on the site would ruin the visual impact and effect property prices.</p> <p>I have witnessed open fires in the area and have concerns that smoke from fires would affect locals' outdoor space.</p>	
	LPPO2673	Travelling Show People Habberley Road	Object	<p>The site has already been turned down for planning permission. Potential Traffic problems amongst other reasons.</p> <p>Concerned that the site would never only be for one temporary user and would be an open invitation to become a permanent gypsy site. Expects that if that happened, the two local businesses would be severely affected as well as having a negative impact on Bewdley Town itself.</p>	Objection noted. This site was considered for one specific family of Travelling Showpeople who are currently resident in the District. This differs from requirements for Gypsy and Traveller sites.
	LPPO2674	Travelling Show People Habberley Road WA/BE/6	Object	<p>The site has already been turned down for planning permission. Potential Traffic problems amongst other reasons.</p> <p>Concerned that the site would never only be for one</p>	Objection noted. This site was considered for one specific family of Travelling Showpeople who are currently resident in the District. This differs from requirements for

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				temporary user and would be an open invitation to become a permanent gypsy site. Expects that if that happened, the two local businesses would be severely affected as well as having a negative impact on Bewdley Town itself.	Gypsy and Traveller sites.
	LPPO2795	Mecure Heath	Object	<ul style="list-style-type: none"> • Only planning applications with exceptional circumstances should be permitted within the Green Belt and I don't feel this application has exceptional circumstances. • The B4129 is a very busy road and will create highway and traffic issues. • There is a high risk that this site will create environmental issues. • This site could be a risk to local businesses. • The cumulative impact on the site would harm the character or appearance of the area and result in an unacceptable impact, especially on the Habberley Valley. 	Objection and comments noted. This site was one of 5 under consideration for a specific Travelling Showpeople family.
	LPPO2802	Clows Top	Object	<p>I do not feel this site would be appropriate due to highways issues - I understand fairground equipment may be stored there. The approach from Kidderminster is up a very steep hill and access to the site would be difficult for large, heavy vehicles.</p> <p>I also feel it would be a pity for such a beautifully located site to be used in part for storage of equipment, housing would be a better use of the site.</p>	Objection and comments noted.

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	LPPO659	Policy 19 Clows Top	Object	<p>The site is not suitable for accommodation. Poor access and highway visibility. Situated on a blind summit with traffic constantly passing at speeds well in excess of the 30mph speed limit in both directions.</p> <p>Drainage: Clows Top is built on clay which is impermeable. Sewage disposal is a problem there are no main drainage schemes proposed as likely in future, any development will cause serious problems with foul and rain water runoff.</p> <p>Legality: A public enquiry some years ago ruled that the site returned to its original contours, after large scale earthworks created a 'yard/storage area' from the top of the hill. Reinstatement never took place. If it had there would be nowhere for occupation.</p> <p>AONB: The village falls within an area of outstanding natural beauty and would suffer blight from the showmen's equipment. On inspection of the current site at Callow Hill gives an indication of the impact, visually that the application would have upon the area.</p>	<p>Objection noted. This site was one of 5 under consideration for a specific Travelling Showpeople family.</p> <p>Not an area of AONB.</p>

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	LPP0163	Policy 20A	Comment	Policy is supported, this is particularly important in rural areas given the limited amount of public transport and I would like to see this policy firmly applied in such locations.	Comments are noted.
Kidderminster Harriers Football Club	LPP0954	Policy 20A - Sub Section A	Comment	<p>The two sentences of part A appear to be contradictory, and would not allow for the relocation of existing facilities, along with combining with other compatible or similar uses to a new site or sites.</p> <p>The reference to the NPPF sequential test in Subsection A of this policy needs to be clarified. Amend:</p> <p>The provision of new community facilities or the enhancement of existing facilities will be permitted, particularly where the proposals have resulted from neighbourhood planning, subject to satisfying the sequential test in the National Planning Policy Framework, where applicable. Applicants will be required to consider whether the combining or rationalisation of facilities would be more appropriate than the provision of a new facility in accordance with the criteria set out in Part B of this policy. <u>Proposals for new community facilities which can offer an increased overall provision or combines compatible facilities will be supported.</u></p>	Policy 20A has been amended taking into consideration responses received.
Kidderminster Harriers Football Club	LPP0955	Policy 20 A - Sub Section B	Comment	<ul style="list-style-type: none"> To provide clarity to this policy. B. Any proposal that would result in the loss of a site or building currently or last used as a community facility will only be permitted if <u>one or more</u> of the following criteria are met: Change to the wording so that accessibility is not the determining criteria. 	Policy 20A has been amended taking into consideration responses received.

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				<p>i. An alternative community facility which meets needs to at least the same extent is, or will be, provided in an equally or more <u>accessible appropriate</u> location; or</p> <ul style="list-style-type: none"> To allow flexibility in this policy. Add new sub para: <u>B. ii. The existing community facility is not compatible with adjacent uses and planning benefits will arise from its relocation or loss.</u> 	
Sport England	LPPO214	Policy 20A	Comment	Generally welcome the policy and reference in the RJ to the emerging Built Facility and Playing Pitch Strategies. A little confused as to why the PPS is ref. under a policy for built community facilities as these are generally regarded as open space/green space assets.	Amended to read community facilities.
Worcestershire County Council, Planning Economy & Performance	LPPO1349	Policy 20A	Comment	The title of this policy should be changed from "Built Communities" to "Community Facilities".	The title has been amended to Community Facilities.
Theatres Trust	LPPO356	Policy 20A	Support	<p>The Theatres Trust welcomes and supports the inclusion of Policy 20A in regards to the promotion and safeguarding of cultural infrastructure.</p> <p>The Policy reflects guidance in para 23, 70 and 156 of the NPPF on planning for culture and cultural activity in local plans.</p>	Comments are noted and welcomed. The Chapter has been updated with relevant paragraph numbers from NPPF 2018.
	LPPO629	Policy 20A	Support	Support for Policy 20A	Support for Policy 20A is noted.

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Bewdley Civic Society	LPPO860	Policy 20A	Support	Support for Policy 20A.	Support for Policy 20A is noted.
Sport England	LPPO215	Policy 20B	Comment	There is no ref. to NPPF Par 74.	Chapter has been updated with relevant paragraph numbers from NPPF 2018.
	LPPO603	Policy 20B	Comment	Green spaces and footpaths that are currently of value to local communities for recreation and their well being should be protected.	Agree that they are important for local communities, comments are noted.
Kidderminster Harriers Football Club	LPPO964	Policy 20B	Comment	To allow provision of buildings associated with community/recreational uses. B. Development of areas allocated as Green Space will not be permitted unless the following exceptional circumstances are demonstrated: i. The proposal is for a community/recreational use <u>and/or associated facilities</u> that does not compromise the essential quality and character of the Green Space; or...	The wording has been amended to paragraph 97 NPPF.
Worcestershire Wildlife Trust	LPPO1069	Policy 20B	Support	Support this policy and the welcome protection it gives to green space. Pleased to note that GI brought forward under Policy 14 will be designated as green space for the purposes of this policy.	Comments are noted.
	LPPO631	Policy 20B	Support	Support for Policy 20B.	Support for Policy 20B is noted.
Bewdley Civic Society	LPPO861	Policy 20B	Support	Support for Policy 20B.	Support for Policy 20B is noted.
Sport England	LPPO216	Policy 20C	Comment	The new Playing Pitch Strategy will include an Action Plan	The Policy has been rewritten.

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				<p>and mechanism for calculating playing field contributions and provision. It is unlikely to recommend local standards as Sport England do not think that local standards are appropriate when planning for playing field provision as set out below. I note the policy details are to be informed by the PPS and BFS and this is welcomed, as is ref. to those strategies.</p> <p>The advice set out below re. local standards may be of relevance and interest to help shape your final approach:</p> <p>Limitations with using standards of provision</p> <p>Standards are sometimes used to help quantify the need that may be generated from a development. However, as set out below there are some risks and weaknesses with their use that should be highlighted:</p> <p>The NPPF does not advocate the use of local standards for assessing the needs or providing for sporting provision (unlike PPG17 (2002) which it replaced). In terms of planning for sport and recreation it advises that specific evidence of the need for provision should be provided along with clarity of what provision is required (NPPF paragraph 73). The Government's Planning Practice Guidance (PPG) points to Sport England's guidance on assessing needs for sporting provision. Rather than advocating the development of standards this guidance (see footnote to the Introduction above), takes the requirements of paragraph 73 of the NPPF and helps the</p>	

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				<p>user develop this more specific evidence.</p> <ol style="list-style-type: none"> 1. The existence of a local standard in a Local Plan, or other development plan document, does not necessarily in itself justify the requirement to seek provision for a specific facility type from an individual development. It would need to be underpinned by a robust assessment of need and developed further to provide a specific local requirement (e.g. an identified project or contribution to an identified project) informed by appropriate feasibility studies, costings etc. 2. If the underlying evidence base, and how the standard has been developed, is not robust and up to date then it may be difficult to justify their use. 3. Standards propose a certain amount of new provision for a given population. This level of new provision may not be necessary and may not relate to identified needs and actions as set out in a supporting evidence base document. For example, improving the quality or accessibility of existing provision to increase its capacity may be a more appropriate way to meet the need generated by a development. 4. Standards do not provide details of the needs that may be generated for the actual use of a facility. Standards therefore have limitations when seeking to improve existing provision to increase its capacity. 5. Standards can be too generic with a single standard 	

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				<p>covering a number of facility types (e.g. x hectares for outdoor sport as opposed to a local assessment that may identify a shortfall of cricket and youth football pitches but adequate provision of adult football pitches). Such standards do not reflect the range of needs for different facility types that fall under a generic heading, or provide any certainty as to what specific needs will be generated from a development and therefore what provision is necessary;</p> <p>6. Applying a standard without robust evidence that existing provision, within a reasonable catchment of the individual development and in its current condition, is unable to meet the additional need will fail to demonstrate that the provision sought is necessary.</p>	
Campaign to Protect Rural England	LPP0941	Policy 20C	Comment	New open space should be capable of providing recreation facilities. Surely threshold should be 11 or more as this would tie in with affordable housing threshold. For developments of 11-25 dwellings, it may be better to ask for contribution towards off-site provision so that usable space is created.	Amendment has been made to the wording regarding number of dwellings. Comments have been noted.
Kidderminster Harriers Football Club	LPP0966	Policy 20C	Comment	To clarify the nature of this proposed policy and how it will apply. Amend: Policy 20C - Provision for Green Space and Outdoor Community Uses in <u>Housing</u> Development	Amendments have been made to Policy 20C taking into consideration responses received.

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Miller Homes	LPP0987	Policy 20C	Comment	<p>Our client wishes to reserve final comment on the requirements for development proposals exceeding 11 dwellings to make provision for Green Space and outdoor community uses until the provisions of the emerging Open Spaces, Built Facilities and Playing Pitch Strategies have been accepted by Wyre Forest District Council (WFDC) and made available. This information is necessary to understand what the proposed standards of provision are, and the justification for them, but also to better understand the interrelationship between this provision and the green infrastructure provision requirements of proposed Policy 14.</p> <p>Our clients also request the inclusion of a ‘subject to viability’ clause within the policy wording, as WFDC has proposed for proposed green infrastructure Policy 14. Whilst Part B of proposed Policy 20C identifies that there are instances where developer contributions will be sought towards off-site provision, this should also recognise that the scale of the financial contribution should not, in combination with the other infrastructure burdens, render the development unviable.</p> <p>The National Planning Policy Framework) NPPF requires that:</p> <p><i>“Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking. Plans should be deliverable. Therefore, the sites and the scale of development identified in the plan should not be</i></p>	Policy 20C has been amended taking into consideration responses received.

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				<p><i>subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable”.</i></p> <p>1 NPPF Para 173.</p>	
Worcestershire County Council, Planning Economy & Performance	LPPO1350	Policy 20C	Comment	<p>We suggest that the first paragraph in this policy is more appropriate for a reasoned justification.</p> <p>New large-scale development can put strain on the existing public rights of way network which may not be fit for the increased use developments can bring. Some new developments may necessitate new public rights of way to be dedicated to link with the existing network, or necessitate improvements to be made to the existing network which we would expect developers to address.</p> <p>Future applicants should obtain a Public Rights of Way Search for development sites, including a check of the Public Path Orders list and the Modification Orders register, in order to ascertain the location and status of any public rights of way recorded on the Definitive Map that may be affected and to check for any claims or changes to the</p>	Policy 20C has been amended taking into consideration responses received.

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				<p>public right of way network in the area.</p> <p>Any future applications should demonstrate how the proposals will protect and enhance public rights of way and access in line with the National Planning Policy Framework.</p> <p>If it is necessary to divert/extinguish/create public rights of way in order for permitted developments to take place, this should be completed to confirmation stage before any development affecting the public rights of way is started. Application should be made to the Planning Authority.</p> <p>Applicants should note paragraph 75 of the National Planning Policy Framework, which states that "planning policies should protect and enhance public rights of way and access". Applicants should note that all public rights of way crossing or adjoining a proposed development site should be marked on the plan to be submitted with the planning application, while the information supplied by an applicant should make clear how the potential development will impinge on any rights of way.</p> <p>Developers should also be aware of the Department of Environment Circular 1/09 (part 7) which explains that the effect of development on a public right of way is a material consideration in the determination of applications for planning permission and that the grant of planning consent does not entitle developers to obstruct a public right of way.</p>	

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				<p>We would hope to see the above matters addressed in any future applications, along with information on how applicants have considered the following obligations toward any affected public rights of way:</p> <ul style="list-style-type: none"> • · No disturbance of, or change to, the surface of the paths or part thereof should be carried out without our written consent. • · No diminution in the widths of the rights of way available for use by the public. • · Buildings materials must not be stored on the rights of way. • · Vehicle movements and parking to be arranged so as not to unreasonably interfere with the public's use of the rights of way. • · No additional barriers are placed across the rights of way. No stile, gate, fence or other structure should be created on, or across, a public right of way without written consent of the Highway Authority. • · The safety of the public using the rights of way is to be ensured at all times. <p>If developments cannot be carried out without temporarily closing public right/s of way for the safety of the public during construction, application should be made at least six weeks in advance to the Mapping Team of the Countryside Service at Worcestershire County Council.</p>	
Gladman	LPPO1391	Policy 20C	Comment	Any expectations for the provision of new open space or	These comments are noted

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Developments Limited				outdoor community uses should be considered in the context of local evidence that has been produced to assess the current availability, quality and quantity of the various typologies of green space provision. Reference to 'green' space should be changed to 'open' space. Access to high quality open spaces and opportunities for sport and recreation make important contribution to health and well-being of communities. Associated policies need to be based on robust and up-to-date needs assessment.	and the points raised will be taken into consideration when the pre-submission plan is formulated.
Wyre Forest District Council - Development Control	LPP01212	Policy 20C	Comment	Presentationally - Para A needs to be broken down/sub-divided. Under Para E - You'll need to seek clarification but my understanding is that despite what the policy is saying, the Council will not wish to have additional, new, open space etc transferred to them as this is an extra financial burden. The Parish/Town Council's may wish to do so, but the suggestion that the Council will take on responsibility in due course appears to contradict what we have been told repeatedly by Cultural Services colleagues.	Policy has been amended taking these points into consideration.
Stanmore Properties Ltd	LPP01516	Policy 20C (iii)	Object	Objection is made to part iii that requires new development to make up an existing shortfall. This is not justified and provision of open space should relate to the need resulting from the new development.	Comments noted.
	LPP0632	Policy 20C	Support	Support for Policy 20C.	Support for Policy 20C is noted.
Bewdley Civic Society	LPP0862	Policy 20C	Support	Support for Policy 20C.	Support for Policy 20C is noted.
Place Partnership Ltd	LPP01092	20.2	Support	WP, WMP and HWFRS welcome and support the recognition of the emergency services as part of the	Comments are noted.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 20: COMMUNITY FACILITIES

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				facilities needed to support sustainable communities and development. This is supported by numerous appeal decisions by the Secretary of the State and Planning Inspectorate (see Appendix 2).	
Sport England	LPPO5099	20.3	Comment	Par 20.3 should really refer to NPPF Pars 73 and 74 as well as those mentioned given they seek to inform/protect sports facilities.	The Chapter has been updated with relevant paragraph numbers from NPPF 2018.
Kidderminster Harriers Football Club	LPPO958	20.3	Comment	It is assumed NPPF para 70 is the correct reference here (para 28 is concerned with rural economy). Amend wording: This policy is consistent with the NPPF (paragraph 28 70) and provides more detail.	Chapter has been updated with relevant paragraph numbers from NPPF 2018.
Kidderminster Harriers Football Club	LPPO961	20.5	Comment	To allow flexibility: In situations where a facility may be redundant, <u>no longer fit for purpose, and/or incompatible with existing neighbour uses</u> , a robust assessment should have taken place, as appropriate.	Policy 20A has been amended taking into consideration responses received.
Kidderminster Harriers Football Club	LPPO963	20.6	Comment	To ensure consideration of both quality and quantity of relevant community facilities. Amend: In the case of any proposals that would result in the loss of a community facility, a satisfactory assessment should be undertaken (using recognised national methodology, e.g. Sport England), that proves there is an excess of similar provision <u>or the facility is not of suitable quality</u> in the appropriate catchment area for that particular facility and the site or building is not needed for any other community service / use.	The chapter has been amended taking into consideration responses received.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 20: COMMUNITY FACILITIES

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Sport England	LPPO5100	20.6	Comment	Par 20.6 should also acknowledge the other criteria in NPPF Par 74 re any loss of open space/sports facilities relating to mitigation etc. (not only surplus). Policy 20A also needs to ensure it is fully reflective of NPPF Par 74 and Sport England's policy to protect playing fields. I don't think for example it really addresses NPPF 74 bullet 3.	Chapter has been updated with relevant paragraph numbers from NPPF 2018. The Chapter has been amended taking into consideration points raised.
Sport England	LPPO5101	20.10	Comment	There is no ref. to NPPF Par 74.	Chapter has been updated with relevant paragraph numbers from NPPF 2018.
Kidderminster Harriers Football Club	LPPO965	20.12	Comment	This paragraph proposes to identify on the Policies Map the Green Spaces to which policy 20B will apply. We reserve the right to make further representations in the light of the publication of the policies map and Open Space Audit.	Comments noted.
Sport England	LPPO217	20.15	Comment	The strategies will identify shortfalls but also it will identify what community sports assets need protecting and which need improving. It may be that development should fund qualitative improvements instead of quantitative provision and this needs to be allowed for within policy/RJ. The policy should help to address deficits by improving both quantitative provision as well as quality.	Amendments to wording have been made.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 21: EMPLOYMENT LAND

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	LPPO2247	Policy 21A	Comment	<p>Industrial Development and Work Opportunities</p> <p>There is any indication of ways in which job opportunities, to replace the fading carpet industry, can be generated. There is no point in building factory units to stand empty. There are still units at Easter Park standing empty. Are more to be built to join them as they wait?</p> <p>The plan should include specific indication of industrial regeneration and employment in the area, otherwise young people will continue to leave the area for more desirable opportunities elsewhere.</p>	It is considered that the policies in the emerging Local Plan will encourage employment into the District or for existing employment in the District to expand, as well as ensuring that there is enough employment land available.
	LPPO633	Policy 21A	Support	Support for Policy 21A.	Support for Policy 21A is noted.
Homes England	LPPO816	Policy 21A	Comment	<p>This policy supports employment development on sites which are not specifically allocated for employment uses in the Local Plan. Outside of allocated areas, employment uses on previously developed land is to be prioritised. It is considered that the proposed development of the former Lea Castle Hospital supports this policy through the redevelopment of a redundant brownfield site for housing, as well as the inclusion of a shop/café/community space and 3,500sqm of employment B1 uses. These employment uses would be delivered in a sustainable location close to the main settlement</p>	Comments are noted.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 21: EMPLOYMENT LAND

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				and adjacent to residential development, to enhance job opportunities within the area.	
Bewdley Civic Society	LPPO872	Policy 21A	Support	Support for Policy 21A.	Support for Policy 21A is noted.
Bewdley Civic Society	LPPO874	Policy 21B	Support	Support for Policy 21B.	Support for Policy 21B is noted.
National Farmers Union West Midlands Region	LPPO1124	Policy 21B	Comment	<p>Concerned that this section focuses on the diversification of businesses away from agriculture and does not recognise the many opportunities for businesses to develop within the agricultural sector. The NFU would like to see a considerable strengthening of the support shown for the rural economy in this document. Many thriving agricultural businesses in the area will be disadvantaged by the lack of specific support for the continued development of the rural economy in the current draft. The section on diversification of farm businesses states that; “the proposed new use does not detract from or prejudice the existing agricultural undertaking or its future operation”. In our experience it is much more likely for a neighbouring development to prejudice an existing agricultural business for example by putting housing at close proximity to an existing livestock unit.</p> <p>Could you also give more information on what is meant by active marketing before conversion to</p>	<p>Policy 21B has been amended adding a new bullet point</p> <ul style="list-style-type: none"> • Agriculture is an important industry in rural areas within Wyre Forest District both for the production of food and for employment. Support will be given for the sustainable growth and development of agricultural and other rural businesses that are in conformity with the other policies in the plan. <p>More information regarding marketing will be incorporated into the Local Plan pre-submission document.</p>

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 21: EMPLOYMENT LAND

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				alternative uses? Marketing has become an issue where demand for a new business has not materialised and residential use may be the next best option for a rural building which may provide housing accommodation.	
Bewdley Civic Society	LPPO875	Policy 21C	Support	Support for Policy 21C.	Support for Policy 21C is noted.
Bewdley Civic Society	LPPO876	Policy 21D	Support	Support for Policy 21D.	Support for Policy 21D is noted.
Wyre Forest District Council	LPPO1215	Policy 21D	Support	The introduction of the percentage split is to be welcomed.	Pleased that this split is supported.
Bewdley Civic Society	LPPO877	Policy 21E	Support	Support for Policy 21E.	Support for Policy 21E is noted.
Hurcott Village Management Committee	LPPO1627	Employment land requirement	Comment	Do we need so much land zoned as industrial and if not shouldn't some of these sites be re-zoned as residential?	Wyre Forest District Council commissioned an Employment Land Review (ELR) in 2016 to assess economic development needs across the District. In the 2016 ELR up to 40 hectares of employment land was required and therefore if employment sites were zoned for residential employment sites would need to be found elsewhere in the District. In 2018 an updated ELR has been commissioned, which will give an updated amount of employment land that will be required across the District.
	LPPO3925	21.1	Object	All available vacant employment units should be occupied before proposing more. A third of the	There are nine units at Easter Park, seven of

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 21: EMPLOYMENT LAND

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				units at Easter Park have never been taken up. Building more units will blight the environment. I do not support these statements. Simply paving over green belt will not solve issues but create them.	these are occupied. Wyre Forest District Council commissioned an Employment Land Review (ELR) in 2016 to assess economic development needs across the District. The findings were that up to 40 hectares of employment land was required within the District. In 2018 an update to the ELR was commissioned to ensure that the requirement for employment land is up to date.
	LPPO4657	21.6	Comment	The burden on the transport infrastructure could be reduced by more home working. This will also help to solve the aging demography problem. The Council's efforts to attract businesses to the area and redress the demographic imbalance is excellent. Section 6.44 discusses the importance of sustainable living in rural areas. It continues, 'measures that cut down commuting and improve the work/life balance should be encouraged'. Policy 24A discusses the need for improved telecommunications and broadband. This will provide concomitant benefits such as reduced traffic congestion and reduced pollution. The government released guidance for how to deliver community-led broadband infrastructure in March 2017, which I am confident will be followed up.	Agree that more home working could reduce the amount of traffic travelling to places of work.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 22: RETAIL

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	LPPO2776	Policy 22A	Comment	If the aim is to regenerate Kidderminster, why are the planners not devising schemes try make the town itself more attractive, a place that people would like visit and to spend time in? The centre is a run-down area of empty shops, or a plethora of charity shops. There are several unsightly areas where buildings have previously been destroyed or demolished, and there seem to be no plans for these. The town at night provides no entertainment, with pubs and the Town Hall concerts being the notable exceptions.	Policy 22A has been amended so that where appropriate, other uses such as residential, recreation and leisure will be supported to bring vitality into the town centre of Kidderminster as retail patterns have changed.
Campaign to Protect Rural England	LPPO942	Policy 22A	Comment	<p>Report below - This encourages the clustering of non residential uses in area beyond primary retail frontages.</p> <p>Retail: a strategy for smaller centres Successive plans have provided for new retail space to be provided, often the ultimate result has not been enlarge the retail area, but to move or shift its centre, so that the core primary frontage declined to secondary frontage or worse. This is likely to be exacerbated with the rise of Internet shopping, whether mail order or click and collect. This has happened in Kidderminster, where Weavers Wharf has led to a lot of empty shops on the eastern side of the centre. We have passed peak retail. This raises the question of what to do with lesser centres, whether the declining part of the strategic centre, the other towns (Bewdley and Stourport) or</p>	Policy 22A has been amended so that where appropriate, other uses such as residential, recreation and leisure will be supported to bring vitality into the town centre of Kidderminster as retail patterns as you point out have changed.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 22: RETAIL

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>district and village centres. This is a means of managing retail decline productively. The key to this is clustering uses other than retail that have traditionally been found in town centres. Uses appropriate for clustering are ones where clients (patients, customers, etc.) need to visit the business (or at least are likely to):</p> <ul style="list-style-type: none"> • Retail (obviously) • Financial services: estate agents, insurance brokers, solicitors, banks • Personal services: gyms, hairdressers, beauticians, tanning salons, tattoo parlours • Medical auxiliaries: dentists, doctors, chiropodists, physiotherapists, etc. <p>A person visiting the dentist may at the same time visit a conveniently located shop, and so on. Conversely, these uses should be discouraged in residential areas. Ground floor residential uses in town and district centres should similarly be discouraged. However, it may be appropriate to have zones on the edge of these mixed use areas, where a transition to residential uses would be permitted. Another class of potential town centre use can be added, but the nature of this probably makes it incompatible with residential:</p> <ul style="list-style-type: none"> • Leisure/evening economy: restaurants, night clubs, pubs, and ancillary kebab and pizza shops <p>Towns should have a modest core with protected primary retail frontage. This is probably not</p>	

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 22: RETAIL

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				necessary for district centres (which are smaller).	
Bewdley Town Council	LPP0835	Policy 22A	Support	Support policy 22A which limits use classes in the "Primary Shopping Frontage". The Neighbourhood Plan is broadly in line with this but limiting A classes to A1, A3 and A4. The emerging Plan will also include C1 as it is important for a town focussed on tourism to have opportunities for centrally located visitor accommodation.	Support for Policy 22A is welcomed and noted.
Bewdley Civic Society	LPP0879	Policy 22A	Support	Support Bewdley at the end of the sequence.	Support for Policy 22A is noted.
Kentucky Fried Chicken (Great Britain) Limited	LPP0630	Policy 22H	Object	<p>1. Policy treats all hot food takeaways in the same way. This is unfair and ignores efforts individual hot food takeaway operators might make to improve the nutritional value of their menu.</p> <p>2. Food of high energy density or poor nutritional value is sold from a range of premises including many in Class A1, such as coffee or sandwich shops, bakeries or, simply, supermarkets, or in Classes A3 or A4.</p> <p>3. No evidence of a causal link between proximity of hot food takeaways and incidence of obesity or overweight. In order to be useful, there would need to be evidence of a particular distance below which harm occurs or is noticeably greater. There is no such evidence.</p>	Comments are noted; however the Council is concerned that the effect of fast food consumption on children's diets and eating behaviour can add to health problems related to obesity. A proliferation of hot food takeaways within walking distance of locations where children and young people congregate, particularly schools can be seen as a contributing factor to rising levels of childhood obesity. 400 metres is considered to be equivalent to a 10 minute walk when taking account of physical barriers, rather than as the crow flies. 400 metres distance is considered sufficient to deter school children from walking to takeaways during their lunch break or after school. (Source NHS Healthy Urban Development)

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 22: RETAIL

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>4. It may be better to rely on objective evidence in a retail study to set maximum proportions of hot food takeaways. Whilst these are primarily directed at protecting the retail health of centres, there is scope to widen their application to provision outside centres, such as standalone or parade units.</p> <p>5. As it is impractical to apply a maximum frontage proportion outside centres, the suggested 400 m distance could be applied, within which the proportion (rather than number) of units, be they in- or out-of-centre, used as hot food takeaways would not be permitted to exceed the same threshold.</p> <p>6. In adopting such an approach, optimal proportions of all retail uses that could contribute to healthy centres or to a healthy offer generally, whether in- or out-of-centre, should be considered instead of focussing on particular uses considered to be a problem for wider social reasons.</p> <p>7. If the policy remains specific to particular use classes, then it should clarify how development that contains only an element of hot food takeaway use (for example, a restaurant and hot food takeaway with neither one predominating) would be considered and whether other factors might be considered.</p>	

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 22: RETAIL

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>8. The inclusion of primary schools is particularly problematic, as it is clear that their pupils are not permitted to leave the premises or travel to or from school unaccompanied. Outside school time, children’s diets are quite properly the responsibility their parents or guardians.</p> <p>9. Consequently, it is unclear how refusing permission for hot food takeaways near primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012.</p> <p>10. A further difficulty of using simple distance radii is that it takes no account of real barriers, either physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than that distance walk away.</p>	
	LPP04033	Policy 22H	Object	<p>“Outside of designated centres, hot food takeaways will be resisted where the proposal is within 400m of the boundary of a school or youth facility.”</p> <p>The number of takeaways in Kidderminster is excessive and I don’t believe that limiting them to within 400m of schools etc. is going far enough. After investing significantly in the new Wyre Forest Leisure Centre, no less than four new takeaways</p>	<p>A minimum of 400 metres is considered to be a 10 minute walk, from a school or youth facility. This distance is considered to be a sufficient distance to deter school children from walking to the takeaways during their lunch period or after school.</p> <p>Policy 22F does try to address problems such as</p>

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 22: RETAIL

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>have appeared very close by, all of which have drive-through facilities. It's parents that have the purchasing power and fast food is just far too accessible.</p> <p>In addition, fast food outlets have significantly contributed to appalling levels of litter along Stourport Road which is only set to get worse if the council chooses Option B which will channel yet further traffic along this route.</p>	litter.
Campaign to Protect Rural England	LPP0943	Policy 22B	Comment	This should be cross-referenced to Policy 6A, which says that no new comparison retail is needed.	Policy 6A Development Needs indicates that no further retail development is required as found in the Retail and Commercial Leisure Needs Study (2016). However if planning applications for retail development are submitted they would need to comply with policies found in Policy 22.
Horsefair Traders Partnership	LPP0570	22E	Object	<p>We represent businesses in the Horsefair Local Centre.</p> <p>Very concerned that the proposed policy does not include the threshold of 280sqm net for neighbourhood and village destinations.</p> <p>The Horsefair Local Centre is currently protected by a limit of 280sqm net for new retail development and we believe that this protection should remain in</p>	Wording of Policy 22D Local Shops has been amended limiting retail development to 280sqm to include neighbourhood and village centres.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>place for local centres in Kidderminster.</p> <p>A limit of 280sqm net would serve to safeguard and protect the vitality and viability of local centres, many of which are already finding it difficult to sustain a flow of trade into the centre in the face of multiple alternative options (including online) now available to consumers.</p> <p>Local centres provide a diverse and convenient range of products and services to the local community, usually within walking distance. If larger scale retail development is allowed to take place nearby, this can result in a direct, adverse impact on existing retailers in the centre. The impact can quite easily have the effect of drawing footfall and trade away from the local centre, making it difficult for existing retailers to continue trading successfully. If stores then are forced to close, a downward spiral of malaise will very soon become established where reduced footfall and trade leads to store closures and as shops become empty, this leads to a further reduction in footfall and the closure of yet more businesses. It is a cycle of decline that is difficult to reverse.</p> <p>Paragraph 23 of the NPFF encourages local planning authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes and a strong network of vibrant</p>	

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 22: RETAIL

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>local and neighbourhood centres, performing a complimentary role to the higher order centres, form a key component of such a hierarchy. Local and neighbourhood centres provide a range of local shops, services and community facilities that perform a vital role in meeting the day to day needs of the local population and thereby enhance the sustainability of communities and residential environments as acknowledged by guidance contained at paragraph 70 of the NPPF.</p> <p>Other local authorities have the limit of 280 sqm net on development near local centres and we would strongly urge Wyre Forest to maintain this protection for Horsefair and other local centres.</p>	
Worcestershire County Council, Planning Economy & Performance	LPP01351	Policy 22F	Comment	<p>For the first point under main bullet point four, it should be noted that development in the green belt is subject to strict tests. The issue of visual amenity is included in the NPPF in relation to the enhancement of beneficial uses. As drafted, this element of the WFLP policy seems to slightly twist the NPPF approach to one of guiding the appropriate location for certain developments. Proposals for development in the green belt should be tested against the NPPF, in particular paragraphs 88 and 89, which state that, subject to limited exceptions, new buildings in the green belt will be inappropriate and will need to demonstrate very special circumstances. The WFLP bullet point, as</p>	The wording of the policy has been amended.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				drafted, could be seen to suggest a weaker level of protection.	
	LPP0635	Policy 22G	Comment	Amenities are required but night licenses must be restricted.	Comment noted.
	LPP0253	22.2	Comment	The town centre has moved away from Worcester Street, residential development/conversion should be in Worcester Street, in retail units such as the former Woolworths. Car parking is available behind Bromsgrove Street, facilities for living are all within walking distance. Residential development would help the town centre, and may help increase footfall to the existing shops.	Policy 22A has been amended so that where appropriate, other uses such as residential, recreation and leisure will be supported to bring vitality into the town centre of Kidderminster as retail patterns have changed.
Worcestershire County Council, Planning Economy & Performance	LPP01378	22.19	Comment	Suggest deleting "roadside" from "roadside petrol stations".	The wording has been amended.
	LPP03706	Retail	Object	Vacant retail outlets in Kidderminster and in Worcester Road. No evidence that new commercial outlets proposed will be not be in the same position.	In the Local Plan no additional retail units are proposed.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 23: SUSTAINABLE TOURISM

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	LPPO639	WMSP	Comment	The already agreed PP for the water park was flawed and road infrastructure MUST be improved for any increase in visitor numbers. This essential for residents and visitors alike.	Comments noted.
Kidderminster Harriers Football Club	LPPO967	Policy 23A	Comment	The club attracts visitors and supporters and is an important local contributor to the district's tourism. The football club is an important multi-functional facility as a tourist attraction as well as an educational, and sports facility. Add to the list of Major Tourist Attractions.	Reference is now made to Kidderminster Harriers in the section Supporting Tourist Attractions. Those listed in the major tourist attractions are those that the first role is tourism, Kidderminster Harriers first role is as a football club.
R & D Turner Charitable Trust	LPPO1179	Policy 23A	Comment	Requests The Arley Estate has a standalone reference within the tourism policies. The Arley Estate incorporating the Arboretum is considered a key and growing asset within the district. It promotes the local and regional economy and creates employment. The creation of new tourism buildings could include a café/restaurant or holiday lodges. Development could be controlled by a master plan, allowing the asset to grow within the constraints of the Green Belt without compromising the sensitive historic landscape. The Arley Estate has seen continued growth in recent years in terms of visitor numbers.	Policy 23A supporting Major Tourist Attractions under the heading Arboreta list the two arboreta located within the District. It is not considered that the arboreta should be listed separately.
	LPPO2783	Policy 23A	Comment	Design Kidderminster to be an attractive and pleasant centre for tourism, taking advantage of	The Local Authority is trying to ensure that Kidderminster is seen as an attractive and

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 23: SUSTAINABLE TOURISM

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				the presence of The Severn Valley Railway; The Safari Park; Carpet heritage trail; and the various sporting opportunities.	pleasant centre for tourism that attracts visitors to visit the many attractions the District has to offer.
West Midland Safari Park	LPP01330	Policy 23A	Support	<p>The WMSP makes a special contribution to the local economy. It is important that appropriate policies are provided that create a positive framework for facilities at WMSP to be upgraded and improved in order to sustain visitor numbers and boost the economic prosperity of the park and local area as a whole. We considers that Policy 23 A achieves these objectives, and supports the Policy. We particularly welcome reference in the Policy itself and in the supporting text to the Masterplan approved by Wyre Forest District Council in 2013.</p> <p>The focus of the Masterplan was the future development of the Hotel, Conference Centre and Waterpark, however, the Masterplan will continue to provide a framework for considering future development of the site, to ensure that development takes account of the potential wider impact it may have. Given the projected lifespan of the Local Plan, it is important that the Policy is sufficiently flexible to enable the evolving plans and aspirations of WMSP to be reflected in an updated or amended Masterplan, and the reference in the Policy to “any other similar agreed document” appears to give this flexibility. On this</p>	Support of Policy 23A is noted.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 23: SUSTAINABLE TOURISM

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				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.	
Historic England	LPO1281	Policy 23B	Support	We support Policy 23B, though we consider that there could also be an opportunity to include a clause for heritage tourism within this policy.	Support for Policy 23B noted, the policy has been amended to read "Heritage assets and their setting should be conserved and, where appropriate, enhanced to encourage heritage tourism within the District".
North Worcestershire Water Management	LPO915	Policy 23C	Comment	<p>It is currently stated that "For sites that are located within the floodplain, consideration should be given to relocating the chalet(s) to an area of lower flood risk and it must be demonstrated that the development can be made safe for the lifetime of the development."</p> <p>It is not clear to me in what situation this consideration should be given: when a holiday chalet is being replaced by a permanent dwelling only or also when there is a like for like replacement? It might be worth rewriting this policy as per policy 28B.</p>	The policy has been removed from section 23, the policy relating to chalets is now found just at 28B.
Wyre Forest District Council	LPO1216	Policy 23C	Comment	Re: Chalets - What's the difference between bullet points 2 and 4. It seems to amount to the same thing.	The policy regarding chalets has been amended and is now moved into Chapter 28 (28B).

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 23: SUSTAINABLE TOURISM

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	LPPO640	Policy 23C	Support	Support for Policy 23C.	Support for policy is noted.
Bewdley Civic Society	LPPO880	Policy 23C	Support	Support for Policy 23C.	Support for this policy is noted.
Campaign to Protect Rural England	LPPO944	Policy 23C	Support	This needs to be more closely related to 18E and 28B. Many of the sites to which this policy is intended to relate are in fact permanently occupied for 11 months of the year. We support the objective that the policy appears to be seeking to achieve.	The policy relating to chalets has been removed from this section; the chalet policy is now just situated in section 28 at policy 28B.
	LPPO636	Para 23.1	Support	Support for paragraph 23.1.	Support is noted and welcomed.
	LPPO250	Question	Comment	<p>Tourism is a very important contributor to the local area.</p> <p>Why has all but 1 toilet block has been closed in Stourport? Even this 1 toilet block was closed for refurbishment at the start of the tourist season!</p> <p>This impacts on the tourists and on the local residents as well.</p> <p>If tourism is so important why is there no provision in Stourport for coaches to park?</p>	<p>Toilets are not a planning issue and therefore are not covered by the emerging Local Plan. Provision of public toilets is not a statutory obligation for Wyre Forest District Council to provide.</p> <p>Comments regarding coach parking are noted.</p>
	LPPO4060	Paragraph 23.2	Comment	Bewdley has a lot to offer as a tourist destination, a historic town with many attractions. If some of the proposed greenfield development took place the impact on the town could reduce its attraction as an historic tourist attraction that benefits the	The Local Authority does not wish Bewdley to become less attractive as a tourist destination, however Bewdley does have a need for additional dwellings and therefore some development is required.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 23: SUSTAINABLE TOURISM

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				whole of Wyre Forest District.	
Worcestershire Wildlife Trust	LPPO1070	Paragraph 23.8	Comment	The term 'Special Wildlife Site' (SWS) has now been replaced with 'Local Wildlife Site' (LWS). The two are synonymous but for clarity we would recommend replacing all references to SWS with LWS.	All references to Special Wildlife Sites (SWS) have been replaced with Local Wildlife Sites (LWS).
Kidderminster Harriers Football Club	LPPO973	Policy 23A Reasoned Justification	Comment	To recognise the importance of Kidderminster Harriers as a visitor destination, and its contribution to the local economy. It regularly attracts around 1,800 –2,200 (home fans) and various visiting teams' spectators (100 – 500) throughout the football season. Add at 23.9 (and renumber subsequent paragraphs). Kidderminster Harriers The football club was formed in around 1886 and has operated under various names and management since then. It regularly attracts around 1,800 – 2,200 (home fans) and various visiting teams' spectators (100 – 500) throughout the football season. As such the club is an important destination and adds to the cultural, social and tourist offer within the district.	Reference is now made to Kidderminster Harriers in the section Supporting Tourist Attractions. Those listed in the major tourist attractions are those that the first role is tourism, Kidderminster Harriers first role is as a football club.
Worcestershire County Council, Planning Economy & Performance	LPPO1379	Paragraph 23.10	Comment	"passangers" should be "passengers".	This has been amended.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 23: SUSTAINABLE TOURISM

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	LPPO361	Paragraph 23.18	Comment	Indeed, there are species found in the Wyre Forest that are found practically nowhere else (e.g. the terrestrial caddis fly, <i>Enoicyla pusilla</i>). There are also species new to the area migrating in: just over the Clee Hill are Red Kites and also the Pine Marten, so it is reasonable to assume that these may colonise the Wyre Forest area in the not too distant future.	Comments are noted.
	LPPO605	23.18	Comment	The use made of the Forest by pedestrian visitors to Bewdley should also be taken into account and encouraged. Walkers enjoy the circular walk along the river, into the Forest and returning on the footpath across the fields from Dry Mill Lane, this being a manageable length walk with plenty of variety & interest, with wonderful views on the last section.	Comments noted.
	LPPO362	Paragraph 23.21	Comment	Don't forget the arboretum in the main forest, where the 'Whitty Pear' tree is nearby.	The section has been updated and makes reference to the 'Whitty Pear' tree.
	LPPO5117	Tourism	Comment	You say that most visitors to the area are day visitor and that you wish to encourage overnight stay. Overnight visitors here stay on the caravan parks mainly to escape the Birmingham and Dudley areas. They come for an escape to the country which building up our area will ensure it loses its appeal.	The Local Authority is supportive of tourism within the District and would not wish tourist attractions to be negatively impacted however additional residential development and employment land is also required.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Worcestershire County Council, Planning Economy & Performance	LPP01352	Policy 24A	Comment	<p>Worcestershire County Council have made some suggested amendments to policy 24A to better align the policy to the Worcestershire Local Broadband Plan and central government's national commitment to providing 10mbps broadband speeds as a minimum.</p> <p>Broadband and Mobile Infrastructure: A. New development should be provided with ultrafast broadband infrastructure or alternative superfast solutions, where appropriate: e.g. mobile broadband, fixed wireless and/or Wi-Fi. Wherever practicable, ultrafast broadband capacity should be incorporated to agreed industry standards (15). Developers and infrastructure providers (16) should work to deliver the highest specification possible for each individual site.</p> <p>i. Developers of new developments (residential and commercial) will be expected to facilitate the provision of a Full Fibre Network infrastructure (Fibre to the Premises (FTTP)). suitable to enable broadband service for all occupiers and to act as 'backhaul' for other technologies e.g. for mobile operators through network carriers that can design / provide materials for a bespoke duct network, for the development.</p> <p>Telecommunications and Broadband: B. When</p>	Policy 24A has been amended taking into consideration responses received.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>considering telecommunications development proposals, developers will be expected to facilitate state of the art mobile coverage (up to and including 5G) and capacity for all occupiers of the development. The following factors will be taken into account:</p> <ul style="list-style-type: none"> i. Operational requirements of the telecommunication networks and the limitations of the technology, including technical constraints on the location of telecommunications apparatus. ii. The need for ICNIRP Guidelines (17) (and/or any other relevant guidance in place at the time of the application) for safe emissions to be met. iii. The need to avoid interference with existing electrical equipment and air traffic services. iv. The potential for sharing existing masts, buildings and other structures. Such evidence and justification for any new site should accompany any application made to the local planning authority. v. Development should also consider the provision of in-building solutions. vi. The impact of the development on its 	

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>surroundings with particular regard to the following criteria:</p> <ul style="list-style-type: none"> • The siting and appearance of the proposed apparatus and associated structures should seek to minimise the impact on the visual amenity, character, landscape or appearance of the surrounding area, particularly if is proposed in a Conservation Area. • If on a building, apparatus and associated structures should be sited and designed in order to seek to minimise the impact on the external appearance. • When choosing a suitable location for the apparatus ongoing access at appropriate and suitable times should be considered. 	
Gladman Developments Limited	LPPO1394	Policy 24A	Object	<p>Policy 24A requires all development to have superfast broadband. Evidence base will need to set out how telecommunications industry will secure connectivity across the district. Move towards superfast broadband is admirable ambition but Gladman consider that this should not unduly impact on ability to meet housing needs across area as a whole. Availability of broadband is outside control of house builders and strict application of such a policy could mean</p>	<p>Objection to the requirement for all new development to be served by superfast broadband is noted.</p> <p>Some infrastructure providers have agreed to provide FTTP infrastructure to new developments of a certain size at no cost to the developer and for a contribution if below a certain size e.g. Openreach; whilst others will provide and deliver materials at zero</p>

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				settlements being left in a 'sustainability trap' unable to meet day to day needs of residents.	cost to the developer e.g. Virgin Media. Ideally, to encourage competition and future appeal of their site, a developer could choose to deploy at least two infrastructure providers on a site.
Bewdley Civic Society	LPO881	Policy 24A	Support	Support for Policy 24A.	Support for Policy 24A is noted.
	LPO591	24B	Comment	Proposals for wind turbines should be resisted as the green credentials and efficiency of this technology appears to be increasingly under question. Damage caused to the environment, and to bird and insect life by these devices now appears to outweigh their benefits.	This comment is noted.
Miller Homes	LPO993	Policy 24B	Comment	Request clarity on the implications of footnote 18 on the interpretation of proposed Policy 24B. Footnote 18 of the Local Plan consultation document states that the Policy should be considered in the context of an “energy hierarchy”, whereby energy demand is reduced through energy efficiency and low energy design before meeting residual energy demand, first from renewable or low carbon sources and then from fossil fuels. This approach implies that Wyre Forest District Council (WFDC) is willing to apply a ‘fabric first’ approach to reducing energy demand, which is an approach supported by our client and the	Amendments have been made to Policy 24B taking into consideration representations received. It is considered that both improvements to the energy efficiency of the building as well as provision of energy from renewable sources will be required. Whilst the Deregulation Bill 2015 indeed sets out that local authorities should not set additional local technical standards or requirements relating to the construction, internal layout, or performance of new dwellings, a key exception to that general rule was that until amendments were made

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>wider housebuilding industry. However Part B of the Policy wording includes a specific requirement for all new developments of one or more dwellings to incorporate the generation of energy from renewable or low carbon equivalent to at least 10% of predicted energy requirements, unless it has been demonstrated that this would make the development unviable. The Policy wording therefore does not include a specific allowance for a fabric first approach to be used to contribute towards achieving a 10% reduction in predicted energy demand, as implied by the footnote, and this needs to be rectified.</p> <p>The approach to renewable energy set out in the new Plan should reflect the relevant national standards. The National Planning Policy Framework (NPPF) requires Local Planning Authorities to set any local requirements for a building’s sustainability in a way that is consistent with the Government’s zero carbon buildings policy and adopt nationally prescribed standards.</p> <p>WFDC currently has a policy to seek 10% of energy requirements from renewable sources in major new developments, but also note that WFDC has encountered difficulties in implementing this, mainly relating to financial viability. This raises uncertainties over the ability of this policy to be</p>	<p>to section 1 of the Planning and Energy Act 2008 by the Deregulation Bill 2015, local authorities retained the right to set and apply policies in their local plans which required compliance with energy performance standards that exceed the requirements of the Building Regulations. Those amendments have not been brought into force.</p> <p>The Planning and Energy Act 2008 states that:</p> <p>A local planning authority in England may in their development plan documents, [F1a strategic planning panel may in their strategic development plan,] and a local planning authority in Wales may in their local development plan, include policies imposing reasonable requirements for—</p> <p>(a) a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development;</p> <p>(b) a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>implemented and raises uncertainty over whether such a policy would be effective in the future if included in the emerging plan.</p> <p>More importantly, the DCLG Written Ministerial Statement (WMS) issued on 25 March 2015 stated that <i>“From the date that the Deregulation Bill 2015 is given Royal Assent, local planning authorities and qualifying bodies preparing neighbourhood plans should not set in their emerging Local Plans, neighbourhood plans, or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings”</i>. The Deregulation Bill was given Royal Assent on 26 March 2015.</p> <p>The WMS also identifies that for the specific issue of energy performance, local planning authorities can continue to set and apply policies in their Local Plans which require compliance with energy performance standards that exceed the energy requirements of Building Regulations until the commencement of amendments to the Planning and Energy Act 2008. The Government has stated that the energy performance requirements in Building Regulations will then be set at a level equivalent to the (outgoing) Code for Sustainable Homes Level 4. Until this amendment into account</p>	<p>development</p>

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				the DCLG expects local planning authorities to take this intention into account.	
Historic England	LPP01282	Policy 24B	Comment	Policy 24B it would be useful to include a section within the policy on where renewable energy is appropriate/ inappropriate for heritage assets and a set of criteria by which to assess planning applications that relate to renewable energy and the historic environment.	Policy 24B has been amended taking into consideration responses received.
Wyre Forest Friends of the Earth	LPP01323	Policy 24B	Comment	The “Vision” section of this document states that by 2034 residents and businesses rely increasingly on energy from locally generated renewable sources. This is quite an ambitious target. In contrast this policy seems very unambitious particularly the requirement for a minimum of only 10% of on-site renewable energy. The policy also states “unless it has been demonstrated that this would make development unviable”, without stating who would decide that it was non-viable.	Wyre Forest District Council is trying to drive more energy usage from locally generated renewable sources. In the Vision section this is an aspiration. Policy 24B states that this should incorporate the energy from renewable or low carbon sources equivalent to at least 10% of predicted energy requirements, unless it has been demonstrated that this would make the development unviable. Viability issues would be submitted to the Local Authority in the form of a viability assessment.
Worcestershire County Council, Planning Economy & Performance	LPP01354	Policy 24B	Comment	Neither the policy nor the supporting text refers to the move towards smart technology, including smart meters and smart grids. Part B requires new developments to include	Policy 24B has been amended and includes much of the suggested amendments.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>renewable or low-carbon energy generation. Where renewables are not installed (for reasons of viability or practicability), consideration could be given to allow for this renewable technology at a later date. Housing and associated infrastructure can be expected to be in use for 50 years+ and should continue to remain fit for purpose.</p> <p>Part C requires large-scale development proposals to examine the potential for a decentralised energy and heating network. The plan does not explain, however, how this potential should be examined and what evidence should be provided to say whether or not a scheme is feasible. A stronger statement could be provided to determine the level of examination required to ensure heat networks are given due consideration. If a district heat network already exists, there could also be a requirement to connect to the network unless evidence demonstrates this is not practicable or viable.</p> <p>Part E refers to appropriate consultation with the community regarding renewable energy. This could also be extended to consider the options for community shares in renewable energy schemes, offering members of the community opportunities to invest in local energy schemes. This could help with the funding of the installations and could</p>	

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				improve community involvement in energy projects.	
Wyre Forest Green Party	LPP01470	Policy 24B	Comment	The “Vision” section of this document states that by 2034 residents and businesses will rely increasingly on energy from locally generated renewable sources. This is quite an ambitious target. In contrast this policy is very unambitious particularly the requirement for a minimum of only 10% of on-site renewable energy. The policy also states “unless it has been demonstrated that this would make development unviable”, so even the 10% target can be ignored	Comments noted.
Taylor Wimpey West Midlands	LPP01546	Policy 24B	Comment	Policies should not accelerate beyond requirements of building regulations, without evidence to support that such requirements are deliverable and will not prevent the delivery of housing.	The Deregulation Bill 2015 sets out that local authorities should not set additional local technical standards or requirements relating to the construction, internal layout, or performance of new dwellings, a key exception to that general rule was that until amendments were made to section 1 of the Planning and Energy Act 2008 by the Deregulation Bill 2015, local authorities retained the right to set and apply policies in their local plans which required compliance with energy performance standards that exceed the requirements of the Building Regulations. Those amendments have not been brought into force.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					<p>The Planning and Energy Act 2008 states that:</p> <p>A local planning authority in England may in their development plan documents, [F1a strategic planning panel may in their strategic development plan,] and a local planning authority in Wales may in their local development plan, include policies imposing reasonable requirements for—</p> <p>(a) a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development;</p> <p>(b) a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development</p>
Persimmon Homes Limited	LPP01565	Policy 24B	Comment	Council aspires for sustainable features to be integrated into all development, new or existing and requires that all development must provide at least 10% of energy from the generation for renewable or low carbon sources. This is a further onerous requirement set by the Council and it is unclear why such measures for new build are necessary, when standards set as part of evolving	The Deregulation Bill 2015 sets out that local authorities should not set additional local technical standards or requirements relating to the construction, internal layout, or performance of new dwellings, a key exception to that general rule was that until amendments were made to section 1 of the Planning and Energy Act 2008 by the

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>Building Regulations (Part L).</p> <p>Consider that a more effective way to increase energy efficiency and low carbon sources would be to implement an energy hierarchy, including a 'fabric first' approach before considering the requirement for renewable energy on site, which can be significant cost implications. This would ensure a limit on the CO2 produced from the construction stages and in the later operational stages of the development. Agree that viability should a consideration when implementing these policies.</p>	<p>Deregulation Bill 2015, local authorities retained the right to set and apply policies in their local plans which required compliance with energy performance standards that exceed the requirements of the Building Regulations. Those amendments have not been brought into force.</p> <p>The Planning and Energy Act 2008 states that:</p> <p>A local planning authority in England may in their development plan documents, [F1a strategic planning panel may in their strategic development plan,] and a local planning authority in Wales may in their local development plan, include policies imposing reasonable requirements for—</p> <p>(a) a proportion of energy used in development in their area to be energy from renewable sources in the locality of the development;</p> <p>(b) a proportion of energy used in development in their area to be low carbon energy from sources in the locality of the development</p>

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					It is considered that both improvements to the energy efficiency of the building as well as provision of energy from renewable sources will be required.
	LPP02198	Policy 24B	Comment	Environmentally sustainable systems should also be introduced and built within dwellings from the outset i.e. solar panels to avoid the current unappealing streetscapes with copious unsightly pieces of solar kit on roof elevations. Perhaps large sites should accommodate areas for solar panels to support energy conservation and sustainability.	Agree that it would be better if solar panels are incorporated into the build when dwellings are built. However on dwellings where this is not the case and they need to be added later it is still a form of energy that is sustainable.
Campaign to Protect Rural England	LPP0945	Policy 24B	Object	Policy does not consider impact on landscape and heritage of renewable energy schemes. Solar farms should be limited to grade 4 & 5 farmland and where landscape impact is slight.	Agricultural land with solar panels can also at the same time be used to graze animals. The land is therefore being used for agricultural purposes. Limiting the use to grade 4 and 5 agricultural land would not be appropriate. Policy 24B has been amended taking into consideration responses received.
Bewdley Civic Society	LPP05156	Policy 24B	Support	Support for Policy 24B.	Support for policy 24B is noted.
	LPP03820	Low carbon technolo	Comment	The plan makes little provision for low carbon technologies. How will Wyre Forest move forward if it doesn't require 'green technologies and low	Policy 24B has been amended to make to ensure that new development proposals should consider location, design, siting and

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
		gies		carbon design' as intrinsic to all schemes?	orientation to maximise the use of natural heat and light and the potential for renewable energy micro-generation and should also include electric vehicle charging points.
	LPP0641	Para 24.1	Support	Support for paragraph 24.1.	Support for paragraph 24.1 is noted.
Worcestershire County Council, Planning Economy & Performance	LPP01353	Paragraph 24.2	Comment	<p>Please amend 3rd sentence to read "Increasingly the demand is for ultrafast FTTP broadband".</p> <p>We propose two additional reasoned justification paragraphs which relate to the addition of paragraph i. under section A of the policy.</p> <p>Some infrastructure providers have agreed to provide FTTP infrastructure to new developments of a certain size at no cost to the developer and for a contribution if below a certain size e.g. Openreach; whilst others will provide and deliver materials at zero cost to the developer, e.g. Virgin Media. Ideally, to encourage competition and future appeal of their site, a developer could choose to deploy at least two infrastructure providers on a site.</p> <p>In some exceptional locations outside urban areas, an equivalent alternate solution may be acceptable if developers are unable to facilitate an FTTP solution, although FTTP is the preferred option and</p>	<p>The first point has been rewritten and is no longer in its original form.</p> <p>The second two points have been incorporated into the reasoned justification.</p>

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 24: TELECOMMUNICATIONS AND RENEWABLE ENERGY

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				the burden of proof lies with the Developer as to why an alternate solution is required. In any case Developers must, as a minimum, make sure that broadband services that meet the standards of the European Digital agenda are made available to all premises, at market prices and with a choice of UK service providers.	
	LPP0642	Para 24.6	Support	Support for paragraph 24.6.	Support for paragraph 24.6 is noted.
	LPP0589	24.8	Comment	This target can be ignored as we will no longer be part of the EU in 2020.	It is not known at this time if the UK will retain EU energy and climate targets after Brexit and therefore until this is changed this is still relevant. Even if the UK does not retain EU targets there will still be relevant targets.
Worcestershire County Council, Planning Economy & Performance	LPP01380	Paragraph 24.9	Comment	The explanation in brackets in the first sentence seems superfluous.	The wording has been amended.
Worcestershire County Council, Planning Economy & Performance	LPP01355	Paragraph 24.12	Comment	Although the plan does refer to the "then" Department for Energy and Climate Change, it should note that this issue now falls under the Department for Business Energy and Industrial Strategy.	This has been amended.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 25: SAFEGUARDING THE GREEN BELT

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Horton Estates Ltd	LPPO865	Policy 25	Comment	We support this policy insofar as it applies national Green Belt policy to the local context. However, the wording of bullet point v. is not considered to be wholly compliant with NPPF para. 89 because it fails to refer to "limited infilling" as being acceptable. In addition the word "identified" is unclear because it is not made explicit how and where such sites should be identified. There is no specific requirement in national policy for PDL sites in the Green Belt to be specifically identified; para. 89 of the NPPF applies to all PDL sites in the Green Belt and, moreover, Policy 34 includes windfall sites so it is unnecessary for Policy 25 to seek to confine this provision to "identified" sites. It is therefore requested that bullet point v. include reference to "limited infilling" and that the word "identified" be deleted.	Comments and suggestions are noted. The 'identified' PDL sites are those set out in Part C of the Plan and will be shown on the Policies Map.
National Farmers Union West Midlands Region	LPPO1126	Policy 25	Comment	We welcome the support shown here for new buildings for agricultural and forestry enterprises. Agricultural business located within Green Belt have to respond to the same pressures to comply with higher welfare and environmental management standards in the same way as those businesses located in other areas of the county. It would also benefit the rural economy if you would recognise the need for new small-scale economic development in	Comments and suggestion is noted.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 25: SAFEGUARDING THE GREEN BELT

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				the Green Belt and for farm diversification schemes.	
Wyre Forest District Council - Development Control	LPPO1252	Policy 25	Comment	In Policy 25 (Green Belt) at bullet ii we refer to "...or for other uses of land which preserve the openness of the Green Belt". As COU has been specifically removed from National Planning Policy Framework not sure inclusion would be in conformity. We have been determining COU application in the GB in accordance with the NPPF rather than SAL.UP1 for this very reason. There are a whole host of court cases that support the NPPF approach not to include COU unless in VSC.	Comments are noted and will be considered further as policy work progresses.
Wyre Forest District Council - Development Control	LPPO1390	Policy 25	Comment	In Policy 25 (Green Belt) at bullet ii we refer to "...or for other uses of land which preserve the openness of the Green Belt". As COU has been specifically removed from National Planning Policy Framework not sure inclusion would be in conformity. We have been determining COU application in the GB in accordance with the NPPF rather than SAL.UP1 for this very reason. There are a whole host of court cases that support the NPPF approach not to include COU unless in VSC.	Comments are noted and will be considered further as policy work progresses.
	LPPO2801	Policy 25	Comment	Not enough thought given to facilities and extra traffic.	Comment is noted.
	LPPO5110	Green	Comment	The focus so far on our objections and	Objection is noted. It is a legal requirement for

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 25: SAFEGUARDING THE GREEN BELT

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
		Belt		observations of the Local Plan has centred on the lack of justification to build dwellings in both Option A and Option B. There are, however, also serious reservations on the assumption made in the Plan that the developments required justify utilising a percentage of Green Belt.	<p>the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>The Sustainability Appraisal (SA) sets out the alternative options that have been considered.</p>
	LPPO643	Section 25	Comment	There will need to be amendments to the Green Belt but the 3 towns must remain distinct from each other.	Comment is noted and agreed.
Kidderminster Harriers Football Club	LPPO975	Policy 25	Comment	<p>To reflect the wording and intent of national Green Belt policy set out in NPPF particularly paragraphs 87–90. National Green Belt policy (NPPF) is not worded such that new developments (either within or conspicuous from GB) are to avoid visual amenity harm due to siting design etc. The proper test for development is in relation only to the openness of Green Belt land.</p> <p>Amend policy as follows: Within the Green Belt, as shown on the Key Diagram, development will not be permitted,</p>	Comments and suggestions are noted.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 25: SAFEGUARDING THE GREEN BELT

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>except in very special circumstances, unless one of the following applies: <u>Within the Green Belt as shown on the Key Diagram/ Policies Map inappropriate development comprising new buildings will be resisted, exceptions to this are;</u> [retain sub para’s i.– vi.]. <u>vii. Development at the land south of Kidderminster as identified on the Policies Map for the centre of sporting excellence and associated facilities.</u> <u>viii. And those forms of developments listed in Para 90 of NPPF (or as to be amended in future revisions of NPPF). Other forms of development should be allowed only in very special circumstances.</u> Proposals within, or conspicuous from the Green Belt, must not be detrimental to the visual amenity of the Green Belt, by virtue of their siting, materials or design.</p>	
	LPPO3605	Policy 25	Object	<p>I cannot see a plausible reason to build on Greenfield sites. Brownfield sites should be built on first, and half of Kidderminster town centre is vacant - a golden opportunity for regeneration is there.</p> <p>Wyre Forest has a population growth BELOW the national average and within the Guidance on the Housing & Economic Development Needs</p>	<p>Objection is noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield</p>

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 25: SAFEGUARDING THE GREEN BELT

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>Assessments 2015, it states that "Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur". I and many others feel that catering for population growth over and above that which is actually required is wrong, especially when it involves using the Green Belt for it and such developments could potentially affect some sites of special scientific interests (development around Hurcott for example).</p> <p>The figures used to calculate the housing requirement have been deliberately maximised to produce the highest possible number of houses required. There is absolutely no need to round the figures upwards. The use of 4.5% vacancy is out of date and should not have been used. The population growth figure taken by the OAHN has no basis in the reality of Wyre Forest. 2.1% is a far more realistic figure.</p> <p>The proposed area in Spennells/Stone is a natural habitat rich in species diversity and home to some endangered species such as Skylarks and Corn Buntings. The land is a natural habitat for birds, bats and other mammals, amphibians and insects that need to be protected.</p> <p>What about the impact on local roads, increased</p>	<p>sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>The Sustainability Appraisal (SA) sets out the alternative options that have been considered.</p> <p>There are policies in the emerging Local Plan which address wildlife and transport issues. Policies in the emerging Local Plan have been informed by evidence base studies and will continue to do so as the plan progresses. These evidence base studies will include transport modelling and green infrastructure concept plans and ecology appraisals.</p>

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				<p>traffic and air pollution, where has this been taken into consideration?</p> <p>The council itself has stated "We've already identified on here many brownfield sites around Kidderminster which could be used but do we have any information on whether the owners of these sites are willing to sell for development", why not pursue these avenues first rather than make the big housing development companies richer for no real reason?</p>	
	LPPO2637	Policy 25	Support	We support Policy 25 Safeguarding the Green Belt	Support of Policy 25 is noted.
	LPPO4857	Policy 25	Support	Support Policy 25.	Support for Policy 25 is noted.
Bewdley Civic Society	LPPO882	Policy 25	Support	Support for Policy 25.	Support for Policy 25 is noted.
	LPPO2199	Green Belt	Comment	<p>It is essential that the Green Belt be safeguarded.</p> <p>There may be opportunities to support infill development within existing settlements and I ask that any sites including windfall possibilities be considered as residential prospects in addition to the other uses cited in the policy.</p>	<p>Comments are noted. We already do count windfall sites to the housing land supply and have done for some time as it is inevitable that windfall sites will arise during the plan period. The emerging Local Plan Policy 18B considers infill development.</p>
	LPPO4120	Policy 25	Object	The seriousness of Green Belt loss together with the numerous benefits Green Belt provides to humans, animals and countless other creatures	Objection is noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The

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				<p>cannot be overstated.</p> <p>The use of every piece of 'Brownfield' and other non-essential land should be developed before any reduction of Green Belt is contemplated.</p> <p>The 'Eastern Relief Road' referred to should not be viewed as any form of benefit compared with the massive impact that even small areas of Green Belt loss has on all living creatures. I do have serious concerns over the increased pressure that will result on the infrastructure - roads, traffic, NHS, etc., from the increase in population in the additional dwellings.</p>	<p>Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>The Sustainability Appraisal (SA) sets out the alternative options that have been considered.</p> <p>Infrastructure is a key issue that is being addressed through the Infrastructure Delivery Plan (IDP). Further infrastructure will be delivered through financial contributions and local or health authority investment to address any issues arising, where necessary and appropriate. Ongoing discussions with health authorities and education providers are being had as the Plan progresses.</p>
Ramblers Association	LPPO4131	Policy 25	Support	<p>Not only is walking healthy it is also enjoyable. That enjoyment is stimulated in large measure by the beauty of the surroundings to which it gives access. The Wyre Forest District is particularly well endowed. It is therefore natural that Ramblers supports policies such as those contained in Section 11 and Policy 25 which</p>	<p>Comments are noted.</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>reflects the concept of the Green Belt to restrict urban sprawl. We therefore look to the District Council to maintain strong policies and a determination to implement them vigorously. We would not wish to see these prospective policies watered down as a result of this local plan process.</p> <p>We also regard these comments as relevant to all other policies and statements which have environmental implications. These include among others, Objectives 1, 6 and 8 in Section 3 (Plan Objectives), Paragraph 5.4 of the Reason Justification in Section 4 (Sustainable Development), Policies 6B and 6F in Section 6, Policy 8C in Section 8 (A Desirable Place to Live), Policy 14 in Section 14 (Strategic Green Infrastructure), Policy 21B (Rural Employment), Policies 23B and 23C in Section 23 (Sustainable Tourism), Policies 24A and 24B in Section 24 (Telecommunications and Renewable Energy), Policy 26 (Safeguarding the Historic Environment), Policy 27A (Quality Design and Local Distinctiveness), Policy 27E (Wyre Forest Waterways) and Policies 28A and 28C in Section 28 (Rural Development).</p>	

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 26: SAFEGUARDING THE HISTORIC ENVIRONMENT

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Wyre Forest District Council - Development Control	LPPO1217	Policy 26	Comment	Isn't there a case for combining Policy 26 with Policy 11B? Some duplication of intentions here.	The splitting up of Historic Environment policy into two sections (where Policy 11B is an over-arching Historic Environment Policy more aligned to the previous Core Plan and Policy 26 is more specific to Development Management and covers those parts of policy formerly contained in the Site Allocations and Policies DPD) follows the model adopted recently within the South Worcestershire Local Plan.
Historic England	LPPO1283	Policy 26	Comment	<p>Policy 26A Safeguarding the Historic Environment - we recognise the improvements from our earlier comments and we appreciate the amendments. We would encourage that Clause A is amended to reference an appropriate qualified professional. Consider re-wording the second part of Clause B as it is currently unclear. We continue to raise concerns over including the term 'enabling development' within a Local Plan policy and we are currently awaiting the production of Good Practice Advice Note 4 Enabling Development, which we will forward onto you when it is completed later this year. We recognise the improvements to Clause D.</p> <p>We would continue to recommend the inclusion of a paragraph about Heritage Statements and what the Council expects to</p>	<p>Support for Policy 26 noted.</p> <p>Amend Policy 26 Section A to read:</p> <p>"Proposals likely to affect the significance of a heritage asset (including the contribution made by its setting or any important vistas or views) should be accompanied by a description of its significance in sufficient detail to allow the potential impacts to be adequately assessed by an appropriately qualified professional. This will usually be in the form of a Heritage Statement. Where there is....."</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>see included within these assessments to provide greater certainty and clarity.</p> <p>We support Policy 27A and we welcome the reference to views and vistas within this policy. It may also be useful to include a sentence on this within Policy 26A and the role of views to setting and significance.</p>	
Gladman Developments Limited	LPP01396	Policy 26	Comment	<p>Gladman note the inclusion of Policy 11B and Policy 26, which together provide policies relating to the historic environment. These policies must reflect guidance in NPPF paras. 126-141. paras. 133-134 sets out need to assess significance of designated heritage assets. Where there is less than substantial harm, this should be weighed against public benefits of proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm. Non-designated assets - policy should reflect para 135 - a balanced judgement should be reached having regard to the scale of any harm and the significance of the heritage asset. In addition, any policy requirements for landscape protection should be fully justified as part of the council's proportionate evidence base and balanced</p>	<p>Local Plans should not repeat sections of the NPPF. Policy 26 B refers to significance being assessed against the NPPF criteria. There is no benefit in this policy referring to specific paragraphs of the NPPF as these are liable to change in the future.</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				criteria based polices drafted	
Bewdley Town Council	LPO831	Policy 26	Support	Policy 26 is to be supported, and in particular the importance of preserving Bewdley's setting, open spaces and views of the town.	Support for Policy 26 noted.
Bewdley Civic Society	LPO883	Policy 26	Support	Point D should provide the parameters to consider subsequent extension to barn conversions.	Support for Policy 26 noted. Policy 26 part D relates to heritage assets generally, specific building types are not defined within this Policy, the Council's stance on extensions to barn conversions is contained within Policy 28A.
Canal & River Trust	LPO1019	Policy 26	Support	Staffordshire and Worcestershire Canal is a designated conservation area. Also several designations along the network plus non-designated heritage assets. Trust welcomes protection afforded to all these assets within policy/supporting text.	Support for Policy 26 noted.
	LPO2638	Policy 26	Support	We support the following: Policy 26 Safeguarding the Historic Environment	Support for Policy 26 noted.
	LPO4422	Policy 26	Support	We wish to support policy 26 safeguarding the historic environment.	Support for Policy 26 noted.
	LPO4858	Policy 26	Support	Support Policy 26.	Support for Policy 26 noted.
Historic England	LPO1284	26.3 and	Support	We support the local list the Council has produced and referenced in paragraph	Support for the local heritage lists and paragraphs 26.3 and 26.4 noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
		26.4		26.3. We further support the inclusion of paragraph 26.4.	
Bewdley Civic Society	LPPO892	Safeguarding the Historic Environment	Comment	Additional Suggestions and Omissions: Suggest a specific policy to ameliorate and support the improvement of and prevent the dereliction of Buildings at Risk, specifically Ribbesford House, Bewdley Bridge and the Old Workhouse.	The Local Authority already has discretionary and statutory obligations to use its powers to address the issues raised in the consultation response, some of which are related to planning but others are related to environmental, housing and building legislation. These are subject to change and fall outside the scope of the Local Plan to define.
	LPPO644	Section 26	Support	Support for Section 26.	Support for Section 26 noted.
Kidderminster Civic Society	LPPO1171	Section 26	Support	Fully supports Section 26.	Support for Section 26 noted.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 27: QUALITY DESIGN AND LOCAL DISTINCTIVENESS

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Kidderminster Harriers Football Club	LPPO994	Policy 27A	Comment	As per NPPF: Add as appropriate, throughout the Policy <u>the need for developments to be accessible for all users, including those with disabilities.</u>	Comments on Policy 27A noted. Policy 27 A Section B to be amended to identify <u>the need for developments to be accessible for all users, including those with disabilities.</u>
Wyre Forest District Council - Development Control	LPPO1218	Policy 27A	Comment	Para B - Fine, but there is no statutory requirement for Design and Access Statement other than for major/heritage related development.	Comments noted, however Policy 27 A paragraph B does not prescribe a Design and Access Statement, allowing for other supporting evidence to be submitted. Paragraph B to be clarified by the following: "...through a Design and Access Statement (or other supporting evidence proportionate to the development proposed)...."
Worcestershire County Council, Planning Economy & Performance	LPPO1356	Policy 27A	Comment	Part A of this policy promotes high levels of sustainability. It is important that developments remain fit for purpose over their lifetime as the climate changes. Consideration could be given to long-term suitability, taking into account the risk of higher temperatures and the possibility of overheating and excess rainfall. There may be opportunities for slowing excess water through the use of green infrastructure, and wider guttering can help to cope with higher-intensity rainfall. The risks infrastructure posed by changes in climate need to be considered to ensure continuity of	Comment on Policy 27 A noted. Amend Policy 27 A reasoned justification as follows: 27.8 It is essential that full consideration is given to achieving sustainable development which counteracts anticipated climatic variations over the lifetime of a new building or development through the choice of location, design and materials. It is also important to address ecological integrity and there may be opportunities for slowing excess water through

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>services and to limit risks of disruption. Further advice and guidance can be sought from the UK Climate Change Risk Assessment, which covers risks to infrastructure and the built environment.</p> <p>Part B (x) of this policy could consider the provision of electric vehicle infrastructure. The plan focuses on the road network and car travel, with the proposal for an additional highway to support housing development. Current government policy is to support the move to electric vehicles, as referred to in the 2017 Queen's Speech and the Industrial Strategy green paper. Government targets are for all new cars and vans to be ultra-low emissions by 2040 and all cars and vans on the road to be ultra-low emissions by 2050. This will be achieved through moving to a range of alternative fuels, including hydrogen and electricity, which can support improvements in air quality. Electric vehicle technology is more advanced and the number of manufacturers producing plug-in electric vehicles is increasing each year. The WFLPR doesn't appear to support this long-term vision with a commitment to charging infrastructure on commercial or residential developments.</p> <p>It may be appropriate for policy 27A in</p>	<p>the use of green infrastructure, and use of guttering which can cope with higher-intensity rainfall. Reducing the demand for energy and improving energy efficiency is also an important starting point for achieving sustainable design. Further advice and guidance can be sought from the UK Climate Change Risk Assessment, which covers risks to infrastructure and the built environment.</p>

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				conjunction with policy 11A to set out that developments should require the appropriate storage of waste and recycling bins for each property, along with safe access for waste disposal vehicles.	
Place Partnership Ltd	LPPO1096	Policy 27A Part xiii	Support	WP, WMP and HWFRS support the inclusion part (xiii) within Policy 27A. In addition, the proposed policy provision is consistent with those in existing development plan documents in Wyre Forest and is also fully supported the decisions taken by Planning Inspectors looking at this elsewhere in Worcestershire and Herefordshire.	Support for Policy 27 A and consistency with other recently adopted Local Plans in Worcestershire is noted.
Historic England	LPPO1285	Policy 27A	Support	We support Policy 27A and we welcome the reference to views and vistas within this policy. It may also be useful to include a sentence on this within Policy 26A and the role of views to setting and significance.	Support for Policy 27 A noted. Agree amendment to Policy 26 A in line with recommendations (see comments on Policy 26 A for wording of amendment)
	LPPO2639	Policy 27A	Support	We support the following: Policy 27A Quality Design and Local Distinctiveness	Support for Policy 27 A noted.
	LPPO4859	Policy 27A	Support	Support Policy 27A.	Support for Policy 27 A noted.
	LPPO645	Policy 27A	Support	Support for Policy 27A.	Support for Policy 27 A noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Bewdley Town Council	LPPO836	Policy 27A	Support	The Council supports the provisions made in Support Policy 27A which seek to preserve the distinct identity of Bewdley. This includes its "prominent views, vistas and skylines" and "heritage assets". The Neighbourhood Plan consultation results ranked the preservation of the town's distinctiveness as vitally important to the local community. <i>Part iv of Policy 27A</i> is of particular relevance here.	Support for Policy 27 A noted.
Bewdley Civic Society	LPPO884	Policy 27A	Support	Support for Policy 27A.	Support for Policy 27 A noted.
Bewdley Civic Society	LPPO885	Policy 27B	Support	Qualified support. This policy doesn't allow for a complete refurbishment or facelift of a property. It promotes the retention of a property that could be visually poor. There needs to be an assessment of the quality of the original property and of benefits of the wholesale change.	Qualified support for Policy 27 B noted. "Complete refurbishment or facelift of a property" is not specifically prohibited within Policy 27 B. Section B stipulates that extensions and alterations should accord with the Council's Adopted Design Quality SPD 2015.
	LPPO2640	Policy 27B	Support	We support the following: Policy 27B Design of extensions etc	Support for Policy 27 B noted.
	LPPO4860	Policy 27B	Support	Support Policy 27B.	Support for Policy 27 B noted.
Worcestershire County Council, Planning Economy & Performance	LPPO1357	Policy 27C	Comment	We consider that Policy 27C could be strengthened by reflecting the Waste Core Strategy's policy WCS 5 and its Explanatory Text paragraphs 4.46 and 4.47, which seek to	Comments on Policy 27 C noted. Insert new paragraph ix. within section C:

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				<p>prevent the inappropriate disposal of excavated materials in artificial mounds unless the use of such material is fully justified as being necessary for purposes such as flood management schemes, levelling of sites, or features for noise attenuation. We suggest that this could be addressed through the inclusion of an additional point under part C of policy 27C such as "Landscape schemes must demonstrate that they: ... Utilise any excavated materials on-site in an appropriate manner and any proposed artificial mounds or bunds are fully justified". The Reasoned Justification could then refer to the Waste Core Strategy.</p> <p>Part C (iii) should also take into account Historic Landscape Characterisation.</p>	<p>"Utilise any excavated materials on-site in an appropriate manner and any proposed artificial mounds or bunds are fully justified".</p> <p>Amend paragraph iii. within section C:</p> <p>"Take into consideration the Landscape Character Assessment and/or Historic Landscape Characterisation, protecting existing trees and landscape features where possible".</p>
Worcestershire County Council, Planning Economy & Performance	LPPO1381	Policy 27C	Comment	In part C (vii), the word "too" should be "to".	<p>Comment noted.</p> <p>Correct typo in Section C paragraph vii. to read:</p> <p>"Utilise lighting and architectural features to give artistic effect where appropriate to the locality"</p>
Canal & River Trust	LPPO1020	Policy 27C	Support	Welcome this policy and requirement to include native landscaping in developments. Canalside landscaping should be appropriate	Support for Policy 27 C noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				for location and set back to allow for future growth and allow for safe navigation. Also need to have robust barriers in place to ensure vehicles do not enter waterway. Details of maintenance of landscape should be required as part of policy.	<p>Policy 27 C Section B to be amended to read:</p> <p>"Landscape Schemes and Boundary Treatments should be specific to the place, recognise the context, reflect existing materials where these contribute to the character of the area and be demonstrably maintainable."</p> <p>Policy 27 E Section C should have a new paragraph:</p> <p>"Canalside landscaping should be appropriate for location, set back to allow for future growth, allow for safe navigation and feature robust barriers to ensure vehicles do not enter the waterway".</p>
Place Partnership Ltd	LPPO1093	Policy 27C	Support	WP, WMP and HWFRS welcome and support the recognition that planting can help to prevent crime and vandalism. This compliments part (xiii) of Policy 27A. Together they will ensure the achievement of the objective of creating safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; as set out in paragraphs 58 and 69 of the NPPF.	Support for Policy 27 C noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	LPPO2641	Policy 27C	Support	We support the following: Policy 27C Landscaping and Boundary Treatment	Support for Policy 27 C noted.
	LPPO4861	Policy 27C	Support	Support Policy 27C.	Support for Policy 27 C noted.
Historic England	LPPO1286	Policy 27D	Comment	We welcome the reference to heritage assets within Policy 27D and what measures are required.	Support for Policy 27 D noted.
Campaign to Protect Rural England	LPPO946	Policy 27D.A.iv	Comment	The policy says that adverts should not “confuse” drivers. It should also require them not to distract <i>them</i> . <i>Having an advertisement at a road junction can have that effect, taking a driver’s concentration away from other traffic.</i> A brief slogan or brand name will probably not distract a driver, but if there is more that needs to be read, it will.	<p>Comments on Policy 27 D A iv. noted.</p> <p>Policy 27 D A ii. requires that "Proposals for advertisements must not be prejudicial to public safety by reasons of their size, location or content", and "distraction" is covered by that paragraph.</p> <p>In respect of Policy 27 D A iv. "confusion" refers to advertisements which might be mis-interpreted as (for example) traffic signals or railway signals, or mis-interpreted as instructions, directional signage or information intended for road, rail or canal traffic. This might or might not have a public safety element, hence the distinction and the two paragraphs in the Policy.</p>
Bewdley Civic Society	LPPO886	Policy 27D	Support	Support for Policy 27D.	Support for Policy 27 D noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Canal & River Trust	LPPO1018	Policy 27E	Comment	The waterways are also supporting climate change, carbon reduction and environmental sustainability initiatives by assisting in the mitigation of flood risk, playing a role in urban cooling, providing sustainable means of transport, supporting biodiversity and forming ecological corridors and contributing to local renewable energy targets through the use of canal water for the heating and cooling of buildings. These opportunities could be reflected in the policy and / or supporting text.	<p>Comments on Policy 27 E noted.</p> <p>Add paragraph to reasoned justification:</p> <p>Environmental Benefits</p> <p>27.47 The District's waterways support climate change, carbon reduction and environmental sustainability initiatives by assisting in the mitigation of flood risk, playing a role in urban cooling, providing sustainable means of transport, supporting biodiversity, forming ecological corridors and contributing to local renewable energy targets through the use of canal water for the heating and cooling of buildings.</p>
Historic England	LPPO1287	Policy 27E	Comment	Policy 27E as referenced elsewhere, we recommend noting that the Canal is a Conservation Area (part of) and that it needs to be considered in line with heritage policies as well as other environmental policies.	<p>Comments noted. The final paragraph of Policy 27 E Section C refers to the Conservation Area, however agree revision will clarify this:</p> <p>Revise Policy 27 E Section C final paragraph to read:</p> <p>"All development proposals affecting the Staffordshire and Worcestershire Canal Conservation Area (a designated heritage asset) must comply with the requirements of Policy 26 Safeguarding the Historic Environment".</p>

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	LPPO4035	Policy 27E	Object	I agree that local canals offer great opportunities for development and should be preserved as a heritage and conservation asset. However, a current lack of bins or alternative waste management solutions along key routes means that litter is once again a major problem. If plans are to improve access to and use of canal-side areas, this problem will only get worse unless targeted measure are put in place.	Objection to Policy 27 E noted, however the provision of waste bins along the canal is the responsibility of the landowner, the Canal and River Trust.
Canal & River Trust	LPPO1017	Policy 27E	Support	The supporting text identifies the Staffordshire & Worcestershire canal as a tourist attraction and the Trust welcomes such recognition. The Policy however is clear that any development proposals whilst supported do need to be appropriate and give sufficient consideration to heritage assets, their setting and character, which we welcome.	Support for Policy 27 E noted.
Canal & River Trust	LPPO1021	Policy 27E	Support	Support policy and need for development to respond to its canalside setting. Support principle that development MUST provide strong active frontage but there may be cases where this is inappropriate - landscaping needs to be retained or dominant buildings screened. Need to take into account setting of specific site and surroundings and respond accordingly. Policy should reflect this. Canal also passes through rural areas and any	Support for Policy 27 E noted. Comments relating to maintenance and development noted. Amendments to Policy 27 E should address these issues.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>towpath improvements should be appropriate to setting and character. Policy should reflect this and Trust should be consulted to determine how this should be funded. Specific improvements have been identified in Kidderminster town centre between Castle Road and Stourvale Drive to include lighting, painting and measures to improve safety.</p> <p>A number of proposed allocations could help finance improvements as they lie in close proximity to the canal corridor. Enhancement works could form part of the infrastructure needs of these development.</p>	
Wyre Forest Friends of the Earth	LPPO1324	Policy 27E - Section C	Support	<p>We strongly approve the policy for developing the canal towpath as a sustainable pedestrian and cycling route. To encourage the maximum use of the towpath there must be decent surface to walk or ride on. Parts of the towpath were resurfaced using rolled aggregate a few years ago but this surface has not been maintained so that large pools of water form when wet. It would be best if the entire towpath through Wyre Forest was paved but on cost grounds it is likely that on the more rural stretches aggregate would be used which must be maintained to keep a decent surface.</p>	Support for Policy 27 E Section C noted.
Wyre Forest Green Party	LPPO1416	Policy 27E -	Support	<p>We strongly approve the policy for developing the canal towpath as a sustainable pedestrian</p>	Support for Policy 27 E Section C noted.

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		bullet point C		and cycling route. To encourage the maximum use of the towpath there must be decent surface to walk or ride on. Parts of the towpath were resurfaced using rolled aggregate a few years ago but this surface has not been maintained so that large pools of water form when wet. It would be best if the entire towpath through Wyre Forest was paved but on cost grounds it is likely that on the more rural stretches aggregate would be used which must be maintained to keep a decent surface.	
Bewdley Town Council	LPPO834	Policy 27E	Support	The Council particularly supports <i>Section A in policy 27E</i> which states that "...initiatives that make a positive contribution to the creation of a high quality riverside environment will be supported...". The Neighbourhood Plan specifically allocates Riverside North as a zone for potential regeneration for leisure and recreation uses in line with the riverside meadows landscape character. This zone could also include car parking to reduce traffic congestion in the town centre.	Support for Policy 27 E noted.
	LPPO2826	27.7	Comment	This states that new facilities such as shops will be needed, use empty shops in Kidderminster instead.	This comment appears not to relate to Paragraph 27.7 which makes no reference to " <i>new facilities such as shops</i> ".
	LPPO647	27.28	Support	Support for paragraph 27.28.	Support for paragraph 27.28 noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Kidderminster Civic Society	LPPO1172	Section 27	Support	Fully supports Section 27.	Support for Section 27 noted.

LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 28: RURAL DEVELOPMENT

Company / Organisation	ID	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	LPPO308	Policy 28A	Comment	At draft Policy 28A, at F there needs to be a cross-reference to draft Policy 8D, with that extensions for family or dependant relatives will be allowed.	Policy 28 A Section F does not permit extensions to previously converted rural buildings. Thus Policy 8 D cannot be applied to annexe accommodation proposed for converted rural buildings as it is not consistent with Policy 28 A Section F. Where there are special circumstances that warrant consideration of a departure from adopted policy each case can be considered on its individual merits.
Bewdley Civic Society	LPPO887	Policy 28A	Comment	Support but object to point F. This point is restrictive and is contrary to NPPF advice on sustainable developments, unreasonable given the changing nature of accommodation requirements and at variance with local distinctiveness policies. Point F singles out barn conversions for very special restrictive policies which does not reflect their importance, their reason or potential impact.	Support for Policy 28 A noted. With respect to the objection: Section F is not considered restrictive - it applies the criteria contained in Policy 28 A Section A paragraph i) to previous development, which was itself subject to similar policies. The proposed Policy 28 A Section A paragraph i) is virtually identical to WFDC Site Allocations and Policies Local Plan 2006-2026 Policy SAL.UP11 paragraph i) which post-dated the NPPF and was considered acceptable under public examination.
Worcestershire Wildlife Trust	LPPO1071	Policy 28A	Comment	We note the wording of this policy and we are pleased to support the commentary set out in Part A. Subsection 5.	Support for Policy 28A noted.
Historic England	LPPO1288	Policy 28A	Comment	Policy 28A it may also be worthwhile to include a	Agree that this reference should be inserted

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				reference to historic farmsteads and the importance of safeguarding these important historic farmsteads and the patterns and form of the buildings. Historic England has further advice on historic farmsteads and development if this would be beneficial.	into Policy 28A A Policy 28 A A iii) has been revised to read: iii) The proposed development enhances and safeguards heritage assets and the pattern and form of the buildings within historic farmsteads.
	LPPO4911	Policy 28A	Comment	We cannot understand why converted barns can not be subsequently extended when other accommodation can.	The purpose of Section F is to ensure development enhances and safeguards heritage assets and the pattern and form of the buildings within historic farmsteads. Section F applies the criteria contained in Policy 28 A Section A paragraph i) to previous development, which was itself subject to similar policies. The proposed Policy 28 A Section A paragraph i) is virtually identical to WFDC Site Allocations and Policies Local Plan 2006-2026 Policy SAL.UP11 paragraph i) which post-dated the NPPF and was considered acceptable under public examination.
	LPPO4913	Policy 28A	Comment	We cannot understand why converted barns cannot be subsequently extended when any other accommodation can.	The purpose of Section F is to ensure development enhances and safeguards heritage assets and the pattern and form of the buildings within historic farmsteads.

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					Section F applies the criteria contained in Policy 28 A Section A paragraph i) to previous development, which was itself subject to similar policies. The proposed Policy 28 A Section A paragraph i) is virtually identical to WFDC Site Allocations and Policies Local Plan 2006-2026 Policy SAL.UP11 paragraph i) which post-dated the NPPF and was considered acceptable under public examination.
Wyre Forest District Council - Development Control	LPPO1219	Policy 28B	Comment	<p>See comments re: Policy 23C above. Need to make sure that we have a single clear and consistent approach to replacement and/or conversion to permanent dwelling.</p> <p>Policy 23C Re: Chalets – What’s the difference between bullet points 2 and 4. It seems to amount to the same thing.</p>	Comments are noted. Policies 23C and 28B have been revised and rationalised to avoid duplication and clarify intent.
	LPPO3543	Policy 28B	Object	<p>I feel furious that as a resident of Austcliffe Park which is classed as Residential, where we pay Council tax,</p> <ol style="list-style-type: none"> 1. where we have adequate road access 2. where we have access to facilities by road foot and public transport. <p>iii. where we live in permanent constructions NOT</p>	Objection to Policy 28 B noted.

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				<p>LIABLE TO FLOOD, HEAVE OR SUBSIDENCE.</p> <p>WE ARE NOT remote from shops, schools or public amenities.</p> <p>I feel we are treated not just as second class citizens, but with contempt by the council of Wyre Forest, where we are continually overlooked by the council in our proposal for 12 months residency. In 2001 the then site owner then was refused a 2 week shutdown proposal, due to the effect it would have on the public amenities and the Green Belt of the area, everything that you now propose to overlook for the proposals of your own!</p>	
Bewdley Civic Society	LPPO888	Policy 28B	Support	Support for Policy 28B.	Support for Policy 28 B noted.
Campaign to Protect Rural England	LPPO947	Policy 28B	Support	We support this policy, but it is closely related to 18E and 23C. At the very least a cross reference is needed, but it might be better to bring them all together.	Support for Policy 28 B noted. Policies 23C and 28B have been re-drafted to avoid duplication and clarify intent.
Environment Agency	LPPO1184	Policy 28B	Support	We support the wording of this policy on the basis of flood risk management issues and safety concerns in line with NPPG and the National Planning Policy Framework (NPPF).	Support for Policy 28 B noted.
	LPPO4421	Policy 28B	Support	The Parish Council of Kidderminster Foreign wish to support policy 28B in respect of chalets,	Support for Policy 28 B noted.

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				caravans and mobile homes.	
Worcestershire Wildlife Trust	LPPO1072	Policy 28C	Comment	We note the content of this policy and we are pleased to support the wording set out in Part B. The risk of harm to biodiversity, and in particular acid grassland and the species that rely on it, from equestrian development is especially significant in Wyre Forest District and so we endorse the proposed policy approach.	Support for Policy 28 C part B noted.
Bewdley Civic Society	LPPO889	Policy 28C	Support	Support for Policy 28C.	Support for Policy 28 C noted.
	LPPO588	Policy 28D	Comment	Agricultural land should be safeguarded as post Brexit it will become a greener and more economic option for food production to return to UK farmland.	Comment on Policy 28 D noted.
Moor Park Trustees	LPPO1100	Policy 28D	Comment	In relation to OC/5 and WFR/CB/7 - The land is Grade II according to the agricultural land classification maps so in that regard it is good agricultural land, however, in order to avoid this and develop anything which is average to low quality (grade 3 to 4) would cause further encroachment into the Green Belt and not contribute to sustainable development by expansion of the development boundary of Kidderminster. The authority, in allocating this site, must be confident that it will not conflict with emerging policy 28D Agricultural land Quality which states that development of such land (as	Comments noted. In light of this and other consultation responses paragraphs 28 D A and 28 D B are no longer required and decision-making will be based on the NPPF and NPPG.

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				defined in the NPPF as including Grade 1,2 and 3a) will not be permitted unless it can be proven it cannot be located elsewhere. We would assume, given the stage we are at, that the LPA has sufficient evidence to support the requirement for such an urban extension on this type of land so as not to conflict with their own policies at a later date. We note that allocation of a site, under point C, may assist this proposal/prevent resistance from a policy perspective.	
Wyre Forest District Council - Development Control	LPPO1220	Policy 28D	Comment	The SWDP places a threshold in terms of how much BVL can be lost. Do we want to take a similar approach, or just stick with a simple "no" to development?	Comment on Policy 28 D noted.
	LPPO455	Policy 28D	Object	<p>Agricultural Land Classification detailed Post 1988 ALC Survey, Kidderminster East (ALCBO7898) published by Natural England on 17th March 2016 states that the agricultural land is Grade 2 deemed very good. At present the fields at the rear of Baldwin Road OC/4 are productive with a grain crop being grown.</p> <p>I am concerned about the detrimental effect any development would have on the wildlife of the area, as well as the impact this would have with the destruction of hedges and mature trees. The Hornet Robberfly has been observed in the fields behind Baldwin Road OC/4 and wildlife includes rabbits, foxes, pheasants and a wide variety of</p>	Comments noted. In light of this and other consultation responses paragraphs 28 D A and 28 D B are no longer required and decision-making will be based on the NPPF and NPPG.

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				birds	
Campaign to Protect Rural England	LPPO948	Policy 28D	Object	Support this policy. HOWEVER it is inconsistent with criteria used for site selection as many of the proposed allocations east of Kidderminster are grade 1 or 2 land. Such land should never be allocated for housing. The reference to allocated sites in part C should be removed.	Support for Policy 28 D noted. Comment requesting removal of reference to allocated sites in Part C is noted, however in making the decision to allocate sites consideration has already been given to the sites' current agricultural land quality.
Gladman Developments Limited	LPPO1398	Policy 28D	Object	Gladman object to the proposal in Policy 28D which introduces a blanket restriction on development of Best and Most Versatile Agricultural Land (BMVAL). They refer to a 2016 judgment on one of their developments which concludes that para.112 of the NPPF cannot be characterised as a policy which indicates that development on BMVAL should be restricted. Any such sites on BMVAL should be judged in the SA alongside all reasonable alternatives.	Comments noted. In light of this and other consultation responses paragraphs 28 D A and 28 D B are no longer required and decision-making will be based on the NPPF and NPPG.
	LPPO649	28.6	Support	Support for paragraph 28.6.	Support for paragraph 28.6 noted.
Land Research & Planning Associates Ltd	LPPO560	28.14	Comment	Agricultural Land Classification (1985 being the last updated document) is out of date in terms of the ability to grow crops and the way land is farmed. In Malvern Hills District Council area a site with Grade 2 and 3 classifications but when a full geological and agronomist's survey was produced the land was poor and hardly worth farming	Comments noted. In light of this and other consultation responses paragraphs 28 D A and 28 D B are no longer required and decision-making will be based on the NPPF and NPPG.

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				economically. So the word "Best" would not apply. Accordingly this matter should be carefully reassessed and revisited.	
	LPPO648	Section 28	Support	Support for Section 28.	Support for Section 28 noted.