

## **Appendix D**

**Representations made to the  
Wyre Forest District Local Plan 2016-2036  
Amendments to the Pre Submission Publication Document (July 2019)  
in accordance with Regulation 20 (2) of The Town and Country  
Planning (Local Planning) (England) Regulations 2012**

**Consultation Period September / October 2019**

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**APPENDIX D: AMENDMENTS TO THE PRE-SUBMISSION PUBLICATION DOCUMENT (JULY 2019) - CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO WHOLE DOCUMENT**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Leon Lupasco	<a href="#">ALPPS40</a>	New development behind Husum way	Comment				Justified Effective	Modifications proposed.	<p>1. The proposed access from the new development to Husum Way by Shakespeare Drive side of the railway bridge is totally unacceptable. Even a traffic light controlled junction will be dangerous as visibility is reduced and vehicles breaking the speed limit as very many do down this road will be at enhanced risk of collision. Also further congestion will inevitably arise at this already busy route.</p> <p>2. Increased parking at Blakedown station will inevitably arise from the new development. As a regular user of Blakedown station I can attest how angry the residents there are to have the current level of parking. I have had rubbish thrown onto my windscreen and a deep key scratch all the way down my car by residents at Blakedown. Have they had the opportunity to object to this plan which will have a significant impact upon those residents?</p> <p>3. The only way to prevent the existing Offmore and Comberton estates from becoming an unofficial by-pass would be to construct a new bridge over the railway to connect the new spine road to the Birmingham Road. Developers' objections to this on the grounds of cost should not be allowed as the reduction in safety and quality of life from all the increased traffic flow is not acceptable.</p> <p>4. The proposed tree bund between the new development and the existing houses is not wide enough. It must be at least 20m wide and be densely planted.</p> <p>5. Due care must be paid to wildlife including nesting Curlews, badgers, owls and bat roosts among others.</p>		
Historic England Kezia Taylerson	<a href="#">ALPPS70</a>	Whole document	Comment	Yes	Yes	Yes		Historic England has no concerns to raise in relation to the July 2019 amendments to the Pre-Submission Publication document. It is noted that Historic Impact Assessment work has been undertaken in relation to the proposed site allocation at Blakedown.		No	

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								Our 2018 concerns remain and we are aware that WFDC is considering these matters and we look forward to continuing to work with the Council on earlier outstanding issues ahead of the EIP.			
Hagley Parish Council	<a href="#">ALPPS144</a>	Whole Plan	Object	No	No	No	Justified Effective Consistent with National Policy	<p>This objection supplements objections made on the previous consultation.</p> <p>Our objection and that of Bromsgrove District Council (which we saw and support) is that the Plan fails adequately to address its adverse impacts on Bromsgrove District and particularly our parish of Hagley. The burden of having a river of traffic flowing through Hagley along A456 is already intolerable. Congestion is already very severe at peak times. Alterations to the Hagley Island (junction with A491) have considerably improved congestion at that junction but congestion at the A456 junctions with B4187 and A450 remains bad. The Plan (as revised) does little to address that; and it must. If a car park with 500 spaces was full every day and was diverting Birmingham or Stourbridge bound passengers off A456 through Hagley, it might reduce the traffic volume by 2-3% at most. This is within what is regarded by planners and traffic engineers as de minimis when considering increases in traffic caused by development. Accordingly, the slight decrease is also de minimis.</p> <p>Furthermore we are puzzled and alarmed that no new traffic evidence, data or information has been provided in either the original Pre-Submission Local Plan or in your amendments to it. We would therefore reiterate our comments in our response to your original Plan "Your own Transport Modelling Report shows that</p>	Please see our response on Transport issues to the original Pre Submission Local Plan. Our comments have not changed.	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.

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								the A456 through Hagley will be operating above its capacity at both the morning and evening peaks in 2036, based on planned developments in Wyre Forest (although it is not clear whether this is based on your latest development proposals, or when the capacity will be reached; as you will note from our comments above we believe that it is already at or near capacity). However, you (or WCC) have provided no evidence based proposal on how to deal with this problem, with only a vague and uncoded reference to a by-pass being required for Hagley. We therefore consider that the WFLP is unsound because we do not believe that it is either Justified, Effective or Consistent with National Policy.			
National Grid	<a href="#">ALPPS149</a>	Amendments document	Comment					No comments to make.			
Worcestershire Regulatory Services Mark Cox	<a href="#">ALPPS69</a>	Whole document	Comment					WRS have reviewed the Wyre Forest District Local Plan Review - Pre-Submission Publication Consultation and have no adverse comments to make.			
The Coal Authority Melanie Lindsley	<a href="#">ALPPS147</a>	Whole document	Comment					I have reviewed the document and can confirm that the Coal Authority has no additional comments to make.			
Richard Maskery	<a href="#">ALPPS81</a>	East of Kidderminster Extension	Object	Yes	No	Yes	Justified Effective	<p>I wish to add the following comments to my previous objections (as submitted December 2018). I strongly believe that the current Local Plan relating to the East of Kidderminster extension is unsound for the following reasons:</p> <p>There are already too many vehicles passing through the Offmore estate. It has become a shortcut for drivers wishing to get to the Birmingham Road from the Comberton side of the estate and the level of traffic has increased exponentially over the last two to three years (presumably</p>	The plan would <b>only</b> be sound if it was to include the construction of a bridge over the railway line (to the East of the existing Husum Way bridge) in order to alleviate traffic through the Offmore estate. If this is not feasible then other sites should be sought within existing boundaries of the town.	No	

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								<p>recent traffic surveys will show this). Not only is the proposed development certain to increase traffic through the existing estate (despite having its own Southern access point) vehicles will be entering/exiting the new development via a suggested junction with Husum Way. Potentially this would create, not only further congestion, but a highly dangerous junction on a road where visibility is obscured by the rise of the railway bridge – a situation that would not be helped by the introduction of traffic lights.</p> <p>With this in mind, the <b>only viable option</b> would be to create a separate Eastern access point for any development to this side of Offmore. This would necessitate the construction of a bridge over the railway line (to the East of the existing Husum Way bridge) and this would mean that the traffic from the new and existing estates would not need to merge, thereby reducing the overall concentration of traffic. <b>Unless a new railway bridge is included in the plans, permission for any development to the East of Offmore should not be granted.</b></p> <p>The plans currently show a narrow green buffer between the Offmore Estate and the suggested development. Although it will still not be enough to create an effective visual screen and to help filter noise and additional pollution, this buffer needs to be a richly planted band of well-established trees at least 20 metres in width.</p> <p>My overall objection to the proposed development remains. The land to the East of Husum Way rises to a high level which means that any new housing (let alone some of the three storey dwellings that</p>			

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								<p>have been mooted by planners) would be extremely visible from surrounding areas (including those on the East side of the Offmore estate).The view across the fields and woodland is a key characteristic of this part of the town and would be obscured/replaced by housing, with a negative impact on quality of life.</p> <p>There are existing areas within the current boundary of the town that would accommodate the 300 houses proposed for this scheme. These would have a lesser impact on existing rural views and help to preserve the current green edge of the conurbation.</p>			
Steve Colella	<a href="#">ALPPS198</a>	Whole plan	Object	No	No	No	Justified Effective Consistent with National Policy	<p>My objection remains to be that that the plan fails to address its adverse impacts on adjoining local authorities and particularly Hagley, Stourbridge and Bromsgrove. Traffic volumes, congestion and poor air quality should be well documented and reported upon in the Transport impact assessments. However, such knowledge has been ignored as there are no robust investment plans that could be seen by a planning inspector as making the WFDC Development plan safe. Thus continuing to ignore these facts would surely render the plan as unsafe and ultimately destined to fail.</p> <p>The strategy around train and bus travel is flawed and severely underestimates the potential to remove more vehicles off the road network in favour of increasing train travel at the earliest point. This takes traffic off the roads at Worcester and Kidderminster thus improving congestion and travel times, air quality and basic human health and wellbeing.</p> <p>The only real investment option is the</p>	<p>The sites at Kidderminster East and Lea Castle are unsustainable, particularly when considering traffic impact assessments and likely costs of mitigating by-passes or link roads. Without a costed, consulted and alternative option appraisals development of these sites must be seen as being unsustainable and therefore unsafe. Alternative development sites across Wyre Forest are required in order to provide a safe and robust ranked list of sited that meet the NPPF Guidance. Ranked Green Belt developable sites using GB value test would suggest that sites elsewhere way from congested routes would ultimately be more sustainable.</p> <p>The transport infrastructure is heavy under pressure and is currently unsustainable even before the start of any future development. Train travel is under supported on the routes that serve Worcestershire into Birmingham and the Black Country. Kidderminster should be made into the main park and ride in the county with free parking encouraging commuter and leisure too. To continue with pay to park on station car parks is a negative strategy on increasing train travel and reducing use of the</p>	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both side of the argument.

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								<p>construction of link roads or by-passes to the M5 to create one or two extra junctions. The proposal in the original plan to create a Hagley by-pass on the A450 is ill thought out as main traffic streams are through the A456 and A491. This demonstrates a total lack of awareness of the facts. The by-pass should be before Blakedown as it suffers the same congestion issues as Hagley and Stourbridge.</p> <p>There seems little support from WFDC and WCC in respect of engaging with detailed and justified planning documents to BDC. BDC is Hagley's parent authority and as such must be given access to strategic plans.</p> <p>Given the impact of development on neighbouring communities the lack of direct consultation must be seen as a measure of whether the plan is future proofed, meeting basic planning protocol, is safe and meets the NPPF in the eyes of the Planning inspectorate.</p>	motor vehicle.		



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RESPONSES TO: APPENDICES**

**THERE WERE NO RESPONSES TO THIS SECTION**

**APPENDIX D: AMENDMENTS TO THE PRE-SUBMISSION PUBLICATION DOCUMENT (JULY 2019) - CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER AM1 : INTRODUCTION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Worcestershire County Council, Planning Economy & Performance  Emily Barker	<a href="#">ALPPS118</a>	AM1.2	Comment					<p>We note that paragraph AM1.2 of the consultation document implies that the Local Transport Plan is part of the development plan, which is not the case.</p> <p>We regret, however, that other recommendations we made to ensure the plan is sound have not yet been addressed. As such, we wish to stress that - with the exception of the section titled 'Sustainable Transport', and subject to ongoing DtC discussions between WCC and WFDC officers - the comments submitted by WCC and dated 17th December 2018 remain extant and should be taken into account.</p>			
Tony Lorton	<a href="#">ALPPS17</a>	SLC Rail Technical Note on Blakedown Station Car Park Needs (June 2019)	Object	No	No	No		<p>The A456 through Blakedown is one of the busiest roads in Worcestershire. Your plans for station will be adding over 1,000 vehicles per day to this congestion at peak hours of the day. There is standing traffic each morning starting at 7.30am with cars turning into the Belbroughton Road as far back as New Wood Lane on very bad days (I have video footage). The traffic jam continues past Blakedown towards Hagley from Broome Lane and can take upwards of 20 minutes to travel through Hagley. This is due to the new road system at top Hagley and new housing development with an extra set of traffic lights. All of which are adding to standing traffic at pick commuter periods. The traffic through Blakedown does not stop at any time now, only from around midnight to 5am when cars speed through breaking the speed limit.</p> <p>When Kidderminster station had free parking nobody travelled to Blakedown to park. Only when higher parking fees came into force, did Blakedown get a lot of extra commuters looking for free parking. Will these drivers pay? When there are no restrictions on side road parking.</p> <p>How will these car parks be policed, they look like ideal sites for travellers to descend, which</p>	Scrap it and build an out of town park and ride on the edge of Kidderminster where people live that need to use it.	No	No

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								<p>we have already had and taken a long time to remove.</p> <p>Station Yard area – long strip of land – access from Lynwood or Station Drive is full of rare wild flowers which I have photographed. OPTION 4 – LARGE AREA OF LAND TO THE NORTH it looks like you plan to bulldoze ancient woodland and a bluebell bank. There are old oak trees along station drive will they be kept, plus the hedgerow along the A456 is species rich. I see no management plans for any of this?</p> <p>Even if Blakedown got a by-bypass forcing so many cars into such a small place would still cause major traffic problems.</p> <p>None of this is to benefit Blakedown!</p> <p>The town planners have messed up Kidderminster totally with a bad ring road system and no comprehensive bypass to link with the new river crossing at Bewdley. All you are doing is sending traffic through all the three towns' suburbs. Catches End Bewdley is a complete bottle neck!</p> <p>I hope we run out of petrol really soon so developments like this are not needed.</p> <p>If these plans go ahead the centre of Blakedown will need more road calming, an extra pedestrian crossing for the school and public sports field. Causing more traffic jams!</p>			
Homes England Sarah Taylor	<a href="#">ALPPS125</a>	1.4	Comment	Yes	Yes	Yes		<p><b>Evidence Base Document – Five Year Housing Land Supply April 2019</b></p> <p>It is noted that this report was prepared as at April 2019 and so as a result it treated the Lea Castle Former hospital site as being subject to signing S106 rather than as a firm commitment, which it now is since the permission being issued in June 2019. 350 of the 600 dwellings at the site are treated as being in the five year supply which</p>	<p><b>Evidence Base Document – Five Year Housing Land Supply April 2019</b></p> <p>It is noted that this report was prepared as at April 2019 and so as a result it treated the Lea Castle Former hospital site as being subject to signing</p>	Yes	Homes England would like to be invited to participate at Examination Hearing Sessions relating to the housing issues and issues relating to the strategic allocation at Lea Castle.

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								Homes England considers to be realistic.	S106 rather than as a firm commitment, which it now is since the permission being issued in June 2019. 350 of the 600 dwellings at the site are treated as being in the five year supply which Homes England considers to be realistic.		
Taylor Wimpey West Midlands	<a href="#">ALPPS270</a>	Policy AM1.4 5 Year Housing Land Supply Evidence Base 2019	Comment					<p>This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 'Land off Ribbesford Road / Rectory Lane'. However, the land which is being promoted for development by Taylor Wimpey extends northwards beyond Site.</p> <p>Wyre Forest District Council has produced an updated Five-Year Housing Land Supply Report, which identifies that the District Council is able to demonstrate a 7.18-year housing land supply.</p> <p>The Report grounds this calculation on the 2014-based household projections, despite the emerging plan deliberately using the 2016-based projections. Given that this Report has been prepared in support of the Local Plan Review, it is strongly contented that the calculation and the plan should match.</p> <p>Medium size sites such as Land at Rectory Lane play an important role in supporting housing land supply in the short-term, in that they are deliverable within five years</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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Homes England Sarah Taylor	<a href="#">ALPPS124</a>	1.3 Employment Evidence Base	Comment	Yes	Yes	Yes		<p><b>Evidence Base Document – Lea Castle Village Employment Land Market Assessment</b></p> <p>The content of this document is noted. A key conclusion from this document is the need for flexibility of B class uses within the site and the need for flexibility over the length of the Local Plan. The demand and take up of employment land on this site and other sites in the district should be regularly monitored throughout the period of the Local Plan to ensure that the strategy is still appropriate.</p>	<p><b>Evidence Base Document – Lea Castle Village Employment Land Market Assessment</b></p> <p>The content of this document is noted. A key conclusion from this document is the need for flexibility of B class uses within the site and the need for flexibility over the length of the Local Plan. The demand and take up of employment land on this site and other sites in the district should be regularly monitored throughout the period of the Local Plan to ensure that</p>	Yes	Homes England would like to be invited to participate at Examination Hearing Sessions relating to the housing issues and issues relating to the strategic allocation at Lea Castle.

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									the strategy is still appropriate.		
Homes England  Sarah Taylor	<a href="#">ALPPS127</a>	1.19 IDP and Viability Note	Comment	Yes	Yes	Yes		<p><b>Evidence Base Documents – Infrastructure Delivery Plan and Pre-Submission Viability Note</b></p> <p>With regard to highways, the IDP sets out several projects and estimated costs. Homes England appreciates that at this stage, the detail of these schemes may not have been worked up and therefore costs are very high level estimates, so a degree of flexibility needs to be assumed when considering the viability of sites based on these estimated costs. Homes England would welcome further information on these projects and assumptions. For instance there is reference to a new off road cycleway from A451 Stourbridge Road from Park Gate Inn to A449 (Worcester Road) mini roundabout, but lack of detail on this and on additional parking at Blakedown Station. Some of these projects relate to or have implications for Lea Castle Village, and therefore Homes England is keen to have further dialogue with Worcestershire County Council (WCC) Highways to better understand the basis for some of these schemes and the further details/assumptions that have been made to arrive at the estimated costs.</p> <p>Regarding the primary education costs estimated for Lea Castle Village, it is noted that the costs do not include land costs, and therefore the land costs would potentially need to be taken off the Lea Castle Village primary education contribution to arrive at the overall S106 contribution.</p> <p>Regarding health care, further discussions are required with Wyre Forest CCG regarding potential provision at Lea Castle Village. A breakdown of the estimated cost that is identified for provision at Lea Castle would be useful as it is noted that the cost for Lea Castle is considerably higher than for the Kidderminster Eastern Extension which is providing a greater number of new houses than Lea Castle and is some distance from existing GP facilities.</p> <p>Regarding 3G pitches and the identification of Lea Castle Village as an appropriate site for one of the two required pitches, further discussions will be required about the land costs and the use of S106 contributions from a number of developments to fund the facilities.</p> <p>It should be noted that where there is reference in the IDP to the</p>		Yes	Homes England would like to be invited to participate at Examination Hearing Sessions relating to the housing issues and issues relating to the strategic allocation at Lea Castle.

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								number of dwellings for each parcel of land at Lea Castle Village, the split of numbers between the parcels of land is indicative only and is subject to more detailed master planning as it will depend where particular land uses are located. The overall number of 800 units (in addition to the 600 units on the former hospital site) is correct. Policy 31 does state that the numbers are indicative, but this is not made clear in the IDP.			
Homes England  Sarah Taylor	<a href="#">ALPPS129</a>	1.19 Transport Evidence	Comment	Yes	Yes	Yes		<p>Homes England welcomes the additional transport evidence that has been made available and the initial identification of a combination of measures to mitigate the impacts of the increased traffic on the network and provide a series of alternatives to car travel to aid modal shift. Clearly further detail on these mitigation measures will be required before Homes England can comment in any detail.</p> <p>It is noted that the transport evidence base sets out a particular split of housing numbers for each of the land parcels at Lea Castle Village. The split of dwelling numbers will not be determined until detailed master planning has been undertaken as it will depend on where the particular land uses are located. The overall number of 800 units (in addition to the 600 units on the former hospital site) is correct. Policy 31 does state that the numbers are indicative, but this is not made clear in all of the evidence base documents.</p>	It should be made clear in the transport evidence base that the number of units assumed for each parcel of land at Lea Castle Village is indicative only and is subject to detailed master planning although the overall number of an additional 800 dwellings (outside the former hospital site) is correct.	Yes	Homes England would like to be invited to participate at Examination Hearing Sessions relating to the housing issues and issues relating to the strategic allocation at Lea Castle.
Barratt Homes West Midlands	<a href="#">ALPPS150</a>	Paragraph 1.19, Infrastructure Delivery Plan	Comment	Yes	No	Yes	Positively Prepared Justified Effective	Paragraph 3.1.5. Of The Infrastructure Delivery Plan suggests for congestion on the A451 Bridge Street is a potential barrier to significant growth to the south of Stourport unless appropriate mitigation is provided.	The IDP should be updated so paragraph 3.1.5 reflects the	No	

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

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								<p>Barratt Homes have been promoting the development of the Pearl Lane allocation (AKR/14) through the Plan making process. A planning application is currently being worked up for the site. As part of this process there has been ongoing discussion with WCC Highways Officers, and the scale of modelling required to demonstrate the site can deliver and approximately 400 dwellings has been agreed and is underway.</p> <p>It is our view, subject to appropriate mitigation, there are no overriding constraints to development in this regard and it would be helpful if this was reflected within the IDP.</p>	<p>information provided to WCC Highways in respect of the modelling and appropriate mitigation package for the delivery of the Pearl Lane allocation. It should be worded in a positive fashion to facilitate growth and confirm that mitigation is available that would support development south of the River Severn.</p>		
<p>Save the Green Belt Surrounding Villages in North Worcestershire</p> <p>John Wood</p>	<a href="#">ALPPS188</a>	AM1.19 Green Belt Review	Object	No	No	No		<p>Not legally compliant - AMEC Foster Wheeler carried out the Green Belt Review in 2016 and 2017. They have also advised Homes England on Lea Castle since 2016. Is this a conflict of interest?</p>	<p>As the Wyre Forest Greenbelt Review cannot be considered independent because of AMEC's conflict of interest, the</p>	Yes	<p>As the Cookley and Caunsall Neighbourhood Plan Committee we consider that we are partners in any development within our parish. We have a lot of knowledge of the planning process now and have unique local</p>



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									Greenbelt Review needs to be done again with an independent consultant or at the very least by subject to independent review.		knowledge. As proposed development within Cookley Parish is the largest in scale of any proposed by the Local Plan, we wish to be part of the examination of the plan.
Richborough Estates Ian Deverell	<a href="#">ALPPS200</a>	AM1.19 Transport Evidence	Comment					<p>The Transport Evidence paper was prepared to identify existing highways network constraints, paying particular attention to how they relate to the proposed site allocations. It is evident from this assessment that the District already suffers from queues and delays, and highlights that the additional growth associated with the emerging Plan will clearly add to the existing network constraints.</p> <p>These high level conclusions are made relative to a series of district wide technical assessments, with Appendix B of the report providing the detailed outputs of VISUM modelling. It is clear from these assessments, that while there are clear constraints elsewhere within the district, the B4190 which bounds the Site (WA/KF/3) operates within capacity with small fluctuations in delay around the AM and PM peak periods. Such conclusions were similarly identified within Richborough Estates' Transport Access Appraisal prepared in support of the Site. Both identify that the proposed development of the Site will not impact upon the local road network and through detailed modelling; it may be possible to deliver increased efficiency of local junctions through S106 contributions.</p>			
Richborough Estates Ian Deverell	<a href="#">ALPPS202</a>	AM1.19 Level 1 and 2 Strategic Flood Risk Assessment	Comment					The Strategic Flood Risk Assessment (Prepared for the Council by JBA Consulting), identifies that land to the north west of Habberley Road (WA/KF/3), is entirely within flood zone 1 and so is considered to have less than 1 in 1,000 annual probability of river or sea flooding.			
Taylor Wimpey	<a href="#">ALPPS229</a>	Paragraph AM1.19 -	Object		No		Justified Effective	This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is		Yes	Taylor Wimpey considers it necessary

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West Midlands		Infrastructure Delivery Plan 2019						<p>identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'.</p> <p><b>Infrastructure Delivery Plan (June 2019) and Viability Assessment Note (June 2019)</b></p> <p>Wyre Forest District Council has updated its Infrastructure Delivery Plan (IDP) in its entirety, with the June 2019 version superseding previous iterations. A 'Pre- Submission Viability Note' has also been prepared in support of the Local Plan, which effectively serves as an update to the Local Plan Viability Assessment Update, October 2018 and the Local Plan Viability Assessment, May 2017. The Note considers changes to National Planning Policy and Guidance, as well as the impact of the updated information concerning the Strategic Sites to be included in the Plan.</p> <p>These two documents are considered together within this representation for ease, as they are intrinsically linked.</p> <p>The Viability Assessment Note identifies that the strategic infrastructure and mitigation costs are "<i>officers' best estimates as at May 2019 and tend to be maximum costs, based on worst case scenarios.</i>" The results of these estimates are significant, in that the Note identifies at Table 4.7 that none of the strategic sites are viable when applying full policy requirements and the entire burden of identified developer contributions.</p> <p>Given the fact that National Planning Policy and Planning Practice Guidance have both been recently updated in respect of demonstrating deliverability, it is wholly unacceptable that the strategic housing allocations which form the foundation of housing provision within the Local Plan Review are underpinned by '<i>best estimates</i>'. Furthermore, the Note has also not been updated to reflect the recent changes to the Community Infrastructure Levy Regulations, specifically, the Removal of Regulation 123 and 'pooling restrictions'.</p> <p>The Note presents a number of scenarios which may be implemented in order to improve the viability of sites, most notably, a reduction in the affordable housing requirement from 30% to 25% and an increase in the net developable area of sites. The reduction of the affordable housing requirement to 25% in respect of strategic sites is considered sound; however, evidence suggests that this could in fact be reduced</p>			to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.	Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

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								<p>further still.</p> <p>Nevertheless, it remains that these calculations are founded upon S106 estimates by officers and not detailed infrastructure costs, cross referenced to the Infrastructure Delivery Plan (IDP) which itself should include evidenced costs. It is also not clear which elements of transport infrastructure relate to allocated sites.</p> <p>At Table 3A, the IDP identifies a number of strategic infrastructure costs, including potential funding sources against each cost. A variety of funding sources are identified, aside from developer contributions. However, it is not clear whether these potential funding sources are considered within the Viability Note, which appears to disseminate the identified costs through developer contributions only. It accordingly appears that strategic infrastructure costs are being disproportionately afforded to strategic sites, thus resulting in sites being considered unviable. In addition, it is incorrectly assumed that all strategic infrastructure costs will be borne by the development industry which is wholly unrealistic. This results in an unrealistic scenario rather than a worst-case scenario.</p> <p>In respect of the strategic transport infrastructure costs there are a range of opportunities, including through HIF and Pinch Point Funding to deliver many of the identified projects. Whilst these are noted within the updated IDP, it is assumed they will make no meaningful contribution through the viability modelling. The Note concludes the increase in strategic infrastructure costs has caused the viability of the Strategic Sites to worsen. The report also identifies a number of policy changes that should be considered to improve viability:</p> <p><i>a. "To consider increasing the number of units on the sites – although this will also impact on the infrastructure and mitigation requirements;</i></p> <p><i>b. To consider other sources of funding (for example HIF bids);</i></p> <p><i>c. Reconsider the preference for social rented rather than affordable rent;</i></p> <p><i>d. Reconsider the strategic infrastructure and mitigation requirements;</i></p> <p><i>e. Reconsider the overall affordable housing requirements; and</i></p>			

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								<p><i>f. Reconsider the density requirements."</i></p> <p>The Council has undertaken no further consideration of these recommended options related to emerging policy and identified no proposed changes in light of these recommended options to the Pre-Submission Local Plan. In addition, it is not understood how a clear decision can be made in respect of the viability of housing allocations until specific, justified and evidenced developer contributions are identified through the IDP and subject to further viability testing.</p>			
Bromsgrove & Redditch DC  Mike Dunphy	<a href="#">ALPPS123</a>	1.19 IDP & Transport	Object	Yes	No	No		<p>Without repeating the previous concerns verbatim the issue that BDC has is that it is still unclear as to what the transport impacts are, of the WFLP on Bromsgrove District. Concerns were expressed previously on the clarity of the work provided to support the 2018 publication version of the plan. Although efforts have been made to address these concerns, the fact remains that from the published information it is, in the view of BDC, not possible to clearly see what the impacts of the developments sites are, and then clearly understand the mitigation strategy.</p> <p>The need for a more robust transport evidence base has been something that BDC has been raising throughout the development of the WFLP. In response to BDCs November 2018 objection, further discussions took place in February and March 2019 where BDC continued to express its position, with WCC officers in attendance. It is BDCs understanding that these discussion in part led to the additional document that has been published, Wyre Forest Local Plan Review, Transport Evidence June 2019. It had been hoped that the content of this document would have addressed the previous concerns BDC raised but unfortunately it does not do this. The position of BDC is, and has always been, that the Council would like to be able to understand the impacts of the plan on the infrastructure within Bromsgrove District, and then to clearly understand how the proposed mitigation and its delivery has been arrived at.</p> <p>Unfortunately the Wyre Forest Local Plan Review, Transport Evidence June 2019 does not satisfy this information gap. It is the view of BDC that the document has flaws. The document at section 4 attempts to suggest that an assessment has been done to confirm that the model is fit for purpose. BDC does not see how any actual assessment has been done, and consider that it is not possible to make the conclusion at para 4.6 based on the information in the preceding section.</p>	Without more robust evidence base in regards to the IDP and Transport Evidence Plans, BDC still does not consider this plan can be made sound with simple policy wording changes.  If it can be demonstrated clearly what the impacts of development are on infrastructure in Bromsgrove, then a clear policy requirement for the delivery of cross	Yes	To hopefully aid the inspector's understanding of the particular local circumstances specific to the objections raised.

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								<p>A more significant concern is that although there is new information in this report, it is still not possible to ascertain from the information provided what the actual impact of development would be. The document shows that flows and journey times will increase in many locations, but without a base year, or updated base year to compare against, all that can be concluded is that there will be more trips on the network. Without being able to compare a scenario where WFLP developments are not present, and where WFLP developments are present, understanding what the actual impacts of development are, is impossible.</p> <p>Another concern with this piece of evidence is that there is no modelling with any mitigation included. Therefore from the evidence available it is not possible to understand if the suggested mitigation in the Infrastructure Delivery Plan (IDP) actually mitigates both individual development sites and also the cumulative impacts of the WFLP.</p>	boundary infrastructure will need to be included in the plan.		
Homes England  Sarah Taylor	<a href="#">ALPPS126</a>	1.3 Heritage Evidence	Comment	Yes	Yes	Yes		<p>It is noted that the Heritage Impact Assessment requires updating in relation to the Lea Castle former hospital site (reference WFR/WC/15). Appendix A states that there has not been any archaeological investigation within the site and that a desk based archaeological assessment should be undertaken and further investigation will be required. Homes England requests that this be updated to reflect the fact that a desk based assessment was undertaken in July 2016 and intrusive investigations/evaluation was undertaken in March 2017. This work was submitted with the outline planning application for the site.</p>	<p>It is noted that the Heritage Impact Assessment requires updating in relation to the Lea Castle former hospital site (reference WFR/WC/15). Appendix A states that there has not been any archaeological investigation within the site and that a desk based</p>	Yes	Homes England would like to be invited to participate at Examination Hearing Sessions relating to the housing issues and issues relating to the strategic allocation at Lea Castle.

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									archaeological assessment should be undertaken and further investigation will be required. Homes England requests that this be updated to reflect the fact that a desk based assessment was undertaken in July 2016 and intrusive investigations/evaluation was undertaken in March 2017. This work was submitted with the outline planning application for the site.		
Homes England Sarah Taylor	<a href="#">ALPPS128</a>	AM1.19 Site Selection Paper	Comment	Yes	Yes	Yes		<b>Evidence Base Document – Site Selection Paper</b>  Homes England supports the broad assessment of the Lea Castle Village sites, although notes that the Ecology score could be green, as the ecology survey work undertaken to date has not identified any ecological issues that would prevent or restrict development at Lea Castle Village. Regarding Green Infrastructure, Lea Castle Village has	<b>Evidence Base Document – Site Selection Paper</b>	Yes	Homes England would like to be invited to participate at Examination Hearing Sessions relating to the housing issues and issues relating to the

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								considerable potential to enhance the wider GI in the area and therefore the amber score is not justified. The same applies to heritage as without undertaking archaeological investigations on the wider site, the heritage potential is not known.	Homes England supports the broad assessment of the Lea Castle Village sites, although notes that the Ecology score could be green, as the ecology survey work undertaken to date has not identified any ecological issues that would prevent or restrict development at Lea Castle Village. Regarding Green Infrastructure, Lea Castle Village has considerable potential to enhance the wider GI in the area and therefore the amber score is not justified. The same		strategic allocation at Lea Castle.

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									applies to heritage as without undertaking archaeological investigations on the wider site, the heritage potential is not known.		
Persimmon Homes Limited	<a href="#">ALPPS140</a>	1.19 Infrastructure Delivery Plan & Viability Note	Object		No		Positively Prepared Justified Effective	<p>RPS supports the Council’s approach to identifying the likely infrastructure requirements to facilitate the Plan. As recognised in the Planning Practice Guidance (“PPG”), Council’s have a clear mandate to identify the contributions that could be expected from development and the associated viability implications that this will have<sup>1</sup>. This should include the provision of affordable housing, along with infrastructure including education, health, transport, flood management and green/digital infrastructure.</p> <p>The ‘front-loading’ of viability has been one of the key changes presented in the changes in national policy/guidance in recent months. Whilst the PPG advises of the role of Plan makers to identify these requirements, in collaboration with relevant stakeholders, it also places a responsibility for site promoters to engage with the process, in order to ensure that the policies adopted by the Council can be delivered.</p> <p>The Council’s evidence base in this regard is the Infrastructure Delivery Plan (June 2019) and associated Pre-Submission Viability Note (updated). Whilst this is the correct thing to do, these documents have been published prior to the changes to the PPG, and it is necessary to understand whether the approach taken by the Council is consistent with the updated guidance.</p> <p>RPS has looked at the above documents in the context of Land at Kidderminster Road (site reference WA/BE/3), promoted by RPS on behalf of Persimmon Homes, which is proposed as a residential allocation in the plan. Although the PPG advises that site promoters need to engage with the process, drawing on the published evidence, the response to this can only be as good as the information provided.</p>	In order for RPS and Persimmon to inform this process, there needs to be a clear understanding of what the Council are requiring of new development, and in particular, what is proposed from Land at Kidderminster Road. At present there are differing accounts of education requirements from the site, and there is little clarity beyond this	Yes	In order to properly represent the interests of the client.



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								<p>In this context, RPS finds the evidence base wanting.</p> <p>The June 2019 Infrastructure Delivery Plan (“2019 IDP”) highlights a number of infrastructure types, however there is a disconnect between this document and what has been identified and what the Council are likely to request from Land at Kidderminster Road. In terms of future contributions, the 2019 IDP identifies a total education contribution of £580,455 to support primary and secondary education needs in Bewdley (Table 4H refers). In respect of this contribution in particular, it is understood that this figure has been derived using a metric from the August 2019 Education Planning Obligations Policy Worcestershire. Page 15 of this document includes the County Council’s formula for calculating necessary school places, however what remains unclear is how this process has been undertaken on an allocation level and whether the sum of the parts align with the need as a whole. Greater clarity on this particular element is required in order to allow for transparency and engagement from the development industry.</p> <p>Beyond this, there are no other contributions attributed with Land at Kidderminster Road. There are however further infrastructure needs identified for Bewdley, though this is calculated on the basis of the total distribution to the town (225 dwellings) rather than on a site-by-site basis:</p> <ul style="list-style-type: none"> <li>• Transport. Proposed development will be expected to contribute towards local transport infrastructure, however no figures identified for the Plan allocations (Para 3.1.6). Table 3b indicates transport schemes around Bewdley, <u>estimated at £6.25m</u>, which is expected to be met through securing s106 alongside securing Government funding.</li> <li>• GP Premises (para 4.2.15). Expected that current facility can accommodate growth, however if this position were to change (no trigger provided), an <u>estimated £275,200</u> would be needed to resource future upgrades;</li> <li>• Sports Facilities. Modernisation of Bewdley Leisure Centre (Table 4k), <u>£500,000-£750,000</u> and improvements to Bewdley Cricket Pitch (para 4.3.59), <u>up to £50,000</u>;</li> <li>• Police (para 4.4.8). Expectation that growth of 225 dwellings will require 1 additional officer, and a <u>contribution of £44,895</u> (covering equipment, vehicles and premises);</li> <li>• Open Space. No figures are ascribed to this infrastructure component; however, it is noted that the Council expect this</li> </ul>	<p>regarding what is expected from the Council. Until this information is provided as part of an updated Infrastructure Plan, supported by viability testing, little certainty can be taken from the Council’s evidence base that the site can be viably delivered.</p> <p>It is expected that this information can be provided by the Council, prior to the examination hearings of the Local Plan, to ensure that the delivery of the Plan is not frustrated, and the developmen</p>		

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								<p>to be secured as part of s106 agreements.</p> <p>Notwithstanding the fact that some of above figures have been loosely estimated, the above list provides little certainty of what is expected from Land at Kidderminster Road and whilst education needs can be factored into an assessment, the actual requirement from the Council appears more likely to be much greater than this.</p> <p>The position is further obscured when compared to the Council's viability testing of Land at Kidderminster Road. The Viability Update Note prepared by the Council does not consider the Site, reflecting only on changes that have occurred since the previous October 2018 Local Plan Viability Update ("2018 LPVA"). The 2018 LPVA does consider Land at Kidderminster Road, and at Appendix 5 of the document, provides an indication of strategic infrastructure requirements for the site and associated costs. This estimates a total contribution of £2,179,400, which is composed of contributions towards sports facilities, education, transport and emergency services. What is clear from this assessment is that of all strategic sites in this list, the cost per dwelling is the highest for Land at Kidderminster Road, in some instances by a significant margin, without clear qualification on how this is fairly distributed.</p> <p>What is perhaps more perverse is that the one constant feature between the two assessments (education provision) includes varying accounts of what is needed. Whilst the 2018 LPVA included an education figure of £491,807, the updated 2019 IDP includes a figure of £580,455, some 18% higher. It is assumed that this difference is reflected as part of the updated guidance from Worcestershire Council; however no attempts have been made in the 2019 Viability Update to understand how this increased position might affect the overall viability of the proposals.</p>	t industry can have the opportunity to comment on an updated evidence base.		
Barratt Homes West Midlands	<a href="#">ALPPS151</a>	Paragraph 1.19 Infrastructure Delivery Plan	Comment	Yes	No	Yes	Positively Prepared Justified Effective	<p>Section 4 of the Infrastructure of the Delivery Plan provides guidance on education and infrastructure requirements, including the potential costs of the infrastructure required to support new development. This includes Table 4d – Estimated Stourport Education Infrastructure Costs, where potential contributions towards primary and secondary education provisions associated with new developments are identified.</p> <p>Whilst we have no objection at this stage regarding the pupil generation numbers within the Plan Area, any planning obligations sought towards education provision must be CIL compliant. Any</p>	Table 4d should include additional text to confirm the planning obligations will be considered on a site by	No	

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								<p>contributions sought should be necessary to make the development acceptable in planning terms, directly related to the development; and fairly and reasonably related in scale and in kind to development.</p> <p>In terms of education provision, at the time at which an application is made, any surplus primary or secondary school capacity should be taken into account. The planning system effectively works upon a first come first served approach in this regard and is inappropriate for the total cost for primary and secondary education contributions to be evenly proportioned across development proposals in the way Table 4d suggests.</p>	<p>site basis, reflecting capacity in the system at that time. The figures in table 4d are indicative only.</p>		
Richborough Estates  Ian Deverell	<a href="#">ALPPS199</a>	AM1.19 Housing and Economic Land Availability Assessment	Comment					<p>Paragraph 67 of the NPPF requires local planning authorities to ensure that they have a clear understanding of available land in their area, through the preparation of a Housing and Economic Land Availability Assessment (HELAA) to establish realistic assumptions about the suitability, availability, and economic viability of land to meet the identified need for housing over the plan period.</p> <p>In recognition of this, it is welcomed that the Council has reviewed and updated their HELAA to provide detailed commentary on the deliverability of sites to be included within their housing land supply.</p> <p>As part of the HELAA update, a series of tables have been introduced to identify sites which are assessed as 'deliverable' within five years from adoption of the Plan and those sites which are 'developable' within the remainder of the plan period. Table J of HELAA considers that Land to the north west of Habberley Road, Kidderminster is a Green Belt site which is 'developable' beyond the initial five year period.</p> <p>We consider that this assessment is likely to be a result of the HELAA assessing a much larger area of land to the west of Kidderminster of which proposed allocation WA/KF/3 forms a very small proportion of. As a result of this, the findings of the assessment are not consistent with the proposed allocation, and identify constraints which are not relevant to the proposed allocation. Richborough Estates consider that if the Council were to review the proposed allocation, rather than the wider area of land, as well as the site specific evidence base which has been prepared in support of the site, then the site would be able to be considered as 'deliverable' within five years from adoption. Indeed, Richborough are committed to the early delivery of WA/KF/3, and will prepare and submit an outline planning application ahead of the examination of the Plan to clearly demonstrate the deliverability of the</p>			

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								Site.			
Richborough Estates Ian Deverell	<a href="#">ALPPS201</a>	AM1.19 Heritage Impact Assessment	Comment					<p>A heritage impact assessment has been prepared to consider the impact which proposed allocations may have upon existing heritage assets within the District. As part of this the assessment considers the impact that development of the Site (WA/KF/3) will have upon known heritage assets within the immediate environs including High Habberley House.</p> <p>As we identified through our previous representations, High Habberley House is not a designated heritage asset and it is not listed on the Council's Local Heritage List and so it is not afforded any special protection.</p> <p>Notwithstanding this, the conclusions and design principles identified within the Heritage Impact Assessment and Richborough Estates' site specific Landscape and Visual Overview have been carried through to the Illustrative Master plan enclosed with these representations, to deliver a high quality design which will protect the setting of High Habberley House through strengthened planting to the south of the site.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS228</a>	Paragraph AM1.19 - Viability Note 2019	Object		No		Justified Effective	<p>This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'.</p> <p><b>Infrastructure Delivery Plan (June 2019) and Viability Assessment Note (June 2019)</b></p> <p>Wyre Forest District Council has updated its Infrastructure Delivery Plan (IDP) in its entirety, with the June 2019 version superseding previous iterations. A 'Pre- Submission Viability Note' has also been prepared in support of the Local Plan, which effectively serves as an update to the Local Plan Viability Assessment Update, October 2018 and the Local Plan Viability Assessment, May 2017. The Note considers changes to National Planning Policy and Guidance, as well as the impact of the updated information concerning the Strategic Sites to be included in the Plan.</p> <p>These two documents are considered together within this representation for ease, as they are intrinsically linked.</p> <p>The Viability Assessment Note identifies that the strategic</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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								<p>infrastructure and mitigation costs are “officers’ best estimates as at May 2019 and tend to be maximum costs, based on worst case scenarios.” The results of these estimates are significant, in that the Note identifies at Table 4.7 that none of the strategic sites are viable when applying full policy requirements and the entire burden of identified developer contributions.</p> <p>Given the fact that National Planning Policy and Planning Practice Guidance have both been recently updated in respect of demonstrating deliverability, it is wholly unacceptable that the strategic housing allocations which form the foundation of housing provision within the Local Plan Review are underpinned by ‘best estimates’. Furthermore, the Note has also not been updated to reflect the recent changes to the Community Infrastructure Levy Regulations, specifically, the Removal of Regulation 123 and ‘pooling restrictions’.</p> <p>The Note presents a number of scenarios which may be implemented in order to improve the viability of sites, most notably, a reduction in the affordable housing requirement from 30% to 25% and an increase in the net developable area of sites. The reduction of the affordable housing requirement to 25% in respect of strategic sites is considered sound; however, evidence suggests that this could in fact be reduced further still.</p> <p>Nevertheless, it remains that these calculations are founded upon S106 estimates by officers and not detailed infrastructure costs, cross referenced to the</p> <p>Infrastructure Delivery Plan (IDP) which itself should include evidenced costs. It is also not clear which elements of transport infrastructure relate to allocated sites.</p> <p>At Table 3A, the IDP identifies a number of strategic infrastructure costs, including potential funding sources against each cost. A variety of funding sources are identified, aside from developer contributions. However, it is not clear whether these potential funding sources are considered within the Viability Note, which appears to disseminate the identified costs through developer contributions only. It accordingly appears that strategic infrastructure costs are being disproportionately afforded to strategic sites, thus resulting in sites being considered unviable. In addition, it is incorrectly assumed that all strategic infrastructure costs will be borne by the development industry which is wholly unrealistic. This results in an unrealistic</p>			

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								<p>scenario rather than a worst-case scenario.</p> <p>In respect of the strategic transport infrastructure costs there are a range of opportunities, including through HIF and Pinch Point Funding to deliver many of the identified projects. Whilst these are noted within the updated IDP, it is assumed they will make no meaningful contribution through the viability modelling.</p> <p>The Note concludes the increase in strategic infrastructure costs has caused the viability of the Strategic Sites to worsen. The report also identifies a number of policy changes that should be considered to improve viability:</p> <p><i>a. "To consider increasing the number of units on the sites – although this will also impact on the infrastructure and mitigation requirements;</i></p> <p><i>b. To consider other sources of funding (for example HIF bids);</i></p> <p><i>c. Reconsider the preference for social rented rather than affordable rent;</i></p> <p><i>d. Reconsider the strategic infrastructure and mitigation requirements;</i></p> <p><i>e. Reconsider the overall affordable housing requirements; and</i></p> <p><i>f. Reconsider the density requirements."</i></p> <p>The Council has undertaken no further consideration of these recommended options related to emerging policy and identified no proposed changes in light of these recommended options to the Pre-Submission Local Plan. In addition, it is not understood how a clear decision can be made in respect of the viability of housing allocations until specific, justified and evidenced developer contributions are identified through the IDP and subject to further viability testing.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS230</a>	Paragraph AM1.19 - Heritage Impact Assessment Report 2019	Comment					<p>This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'.</p> <p><b>Heritage Impact Assessment Report (August 2019)</b></p> <p>An updated Heritage Impact Assessment Report has been published, which considers the heritage impact of the development of both</p>		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in

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								<p>allocated and un- allocated sites within Wyre Forest.</p> <p>This is identified within Appendix B as Site Ref: LI/5. The Assessment states that the site is adjacent to the southern section of the Severn Valley Railway (GWR), which is considered by Wyre Forest District Council to constitute a non-designated heritage asset.</p> <p>The Assessment presents a description as to the significance of the Railway under sub-heading 2a. Taylor Wimpey does not necessarily dispute that which is presented, however, the description of significance appears to be simply a brief description of the history of the Railway, rather than an assessment of its merit as a non-designated asset.</p> <p>Further assessment work therefore needs to be undertaken in order to properly ascertain the historical significance of the Railway.</p> <p>Nonetheless, Taylor Wimpey concurs with the Assessment in that any development that may take place on the site is capable of mitigating its impact upon the Railway. Taylor Wimpey also acknowledges the requirement for a desk- based assessment of archaeological potential of the site, which would be carried out and included as part of any planning application submission.</p> <p>Taylor Wimpey would utilise all reasonable endeavours to ensure any heritage features are incorporated within any master plan.</p>			respect of the plan.  Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	<a href="#">ALPPS231</a>	Paragraph AM1.19 - Site Selection Paper 2019	Object		No		Justified	<p>This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'.</p> <p><b>Sites Selection Paper (August 2019) and Sustainability Appraisal (July 2019)</b></p> <p>Pegasus Group has previously commented upon the Sites Selection Paper (October 2018) and the Sustainability Appraisal (October 2018) and their scoring of Site Ref: LI/5. The conclusions within the Sites Selection Paper (August 2019) and Sustainability Appraisal (July 2019) remain unaltered in respect of this site and therefore our previous comments remain, namely:</p> <p>The previous iterations of the Sustainability Appraisal findings are inconsistent with one another as a number of criteria have been</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy</p>

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								<p>amended between the 2017 and 2018 iterations without justification, including;</p> <ul style="list-style-type: none"> <li>• Accessibility to local services – site reduced from ‘double plus’ to ‘zero’ score, despite services and facilities provision in locality and site accessibility remaining the same;</li> <li>• Meeting housing need – score reduced from ‘double plus’ to ‘single plus’, despite site development capacity remaining the same;</li> <li>• Biodiversity – score reduced from ‘zero’ to ‘single negative’, despite no further survey work having been undertaken.</li> </ul> <p>It is therefore considered that the site selection process is not clear and transparent, and that weighting and planning judgements appear to have been applied to determine the site allocations, rather than utilising the evidence base as prepared.</p>			contained therein.
Taylor Wimpey West Midlands	<a href="#">ALPPS242</a>	AM1.19 - Site Selection Paper	Comment					<p>This representation relates to land at Belbroughton Road, Blakedown, which is within the control of Taylor Wimpey. This land has not previously been promoted through the Local Plan Review process. A small section (approximately 1ha) of the site is included within the Rural East HELAA (August 2019) as Site Ref: WFR/CB/4 ‘Land Adjacent to 77 Belbroughton Road’.</p> <p>The Sites Selection Paper and Sustainability Appraisal do not consider the site, as it has not been previously promoted for development.</p> <p>Pegasus Group has prepared an assessment of the wider site against the criteria contained within the Sustainability Appraisal, including the relevant categories of impact significance. This is included overleaf.</p> <p>The site is capable of delivering upwards of 400 new homes to meet an identified market and affordable housing need within Wyre Forest District. Given the extent of the site, there is also potential to deliver a social/community facility, dependent on identified need, thus furthering the sustainability of Blakedown as a settlement overall.</p> <p>The development of the site will support existing rail and bus services at Blakedown, thus reducing dependency on the private car. In accordance with the NPPF, the development of the site will deliver net gains for biodiversity.</p> <p>Overall, Land at Belbroughton Road has the potential to deliver positive outcomes when compared to the current situation.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>



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Taylor Wimpey West Midlands	<a href="#">ALPPS244</a>	AM1.19 IDP	Object		No		Effective	<p>This representation relates to land at Belbroughton Road, Blakedown, which is within the control of Taylor Wimpey. This land has not previously been promoted through the Local Plan Review process. A small section (approximately 1ha) of the site is included within the Rural East HELAA (August 2019) as Site Ref: WFR/CB/4 'Land Adjacent to 77 Belbroughton Road'.</p> <p>Wyre Forest District Council has updated its Infrastructure Delivery Plan (IDP) in its entirety, with the June 2019 version superseding previous iterations. A 'Pre- Submission Viability Note' has also been prepared in support of the Local Plan, which effectively serves as an update to the Local Plan Viability Assessment Update, October 2018 and the Local Plan Viability Assessment, May 2017. The Note considers changes to National Planning Policy and Guidance, as well as the impact of the updated information concerning the Strategic Sites to be included in the Plan.</p> <p>These two documents are considered together within this representation for ease, as they are intrinsically linked.</p> <p>The Viability Assessment Note identifies that the strategic infrastructure and mitigation costs are "<i>officers' best estimates as at May 2019 and tend to be maximum costs, based on worst case scenarios.</i>" The results of these estimates are significant, in that the Note identifies at Table 4.7 that none of the strategic sites are viable when applying full policy requirements and the entire burden of identified developer contributions.</p> <p>Given the fact that National Planning Policy and Planning Practice Guidance have both been recently updated in respect of demonstrating deliverability, it is wholly unacceptable that the strategic housing allocations which form the foundation of housing provision within the Local Plan Review are underpinned by '<i>best estimates</i>'. Furthermore, the Note has also not been updated to reflect the recent changes to the Community Infrastructure Levy Regulations, specifically, the Removal of Regulation 123 and 'pooling restrictions'.</p> <p>The Note presents a number of scenarios which may be implemented in order to improve the viability of sites, most notably, a reduction in the affordable housing requirement from 30% to 25% and an increase in the net developable area of sites. The reduction of the affordable housing requirement to 25% in respect of strategic sites is considered sound; however, evidence suggests that this could in fact be reduced</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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								<p>further still.</p> <p>Nevertheless, it remains that these calculations are founded upon S106 estimates by officers and not detailed infrastructure costs, cross referenced to the Infrastructure Delivery Plan (IDP) which itself should include evidenced costs. It is also not clear which elements of transport infrastructure relate to allocated sites.</p> <p>At Table 3A, the IDP identifies a number of strategic infrastructure costs, including potential funding sources against each cost. A variety of funding sources are identified, aside from developer contributions. However, it is not clear whether these potential funding sources are considered within the Viability Note, which appears to disseminate the identified costs through developer contributions only. It accordingly appears that strategic infrastructure costs are being disproportionately afforded to strategic sites, thus resulting in sites being considered unviable. In addition, it is incorrectly assumed that all strategic infrastructure costs will be borne by the development industry which is wholly unrealistic. This results in an unrealistic scenario rather than a worst-case scenario.</p> <p>In respect of the strategic transport infrastructure costs there are a range of opportunities, including through HIF and Pinch Point Funding to deliver many of the identified projects. Whilst these are noted within the updated IDP, it is assumed they will make no meaningful contribution through the viability modelling.</p> <p>The Note concludes the increase in strategic infrastructure costs has caused the viability of the Strategic Sites to worsen. The report also identifies a number of policy changes that should be considered to improve viability:</p> <ol style="list-style-type: none"> <li>1. <i>“To consider increasing the number of units on the sites – although this will also impact on the infrastructure and mitigation requirements;</i></li> <li>2. <i>To consider other sources of funding (for example HIF bids);</i></li> <li>3. <i>Reconsider the preference for social rented rather than affordable rent;</i></li> <li>4. <i>Reconsider the strategic infrastructure and mitigation requirements;</i></li> <li>5. <i>Reconsider the overall affordable housing requirements; and</i></li> <li>6. <i>Reconsider the density requirements.”</i></li> </ol>			

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								The Council has undertaken no further consideration of these recommended options related to emerging policy and identified no proposed changes in light of these recommended options to the Pre-Submission Local Plan. In addition, it is not understood how a clear decision can be made in respect of the viability of housing allocations until specific, justified and evidenced developer contributions are identified through the IDP and subject to further viability testing.			
Taylor Wimpey West Midlands	<a href="#">ALPPS259</a>	Policy AM1.19 Heritage Impact Assessment	Comment					<p>This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 'Land off Ribbesford Road / Rectory Lane'. However, the land which is being promoted for development by Taylor Wimpey extends northwards beyond Site.</p> <p>An updated Heritage Impact Assessment Report has been published, which considers the heritage impact of the development of both allocated and un- allocated sites within Wyre Forest.</p> <p>The is, in part, identified within Appendix B as Site Ref: AKR/15, although as stated previously, the land being promoted by Taylor Wimpey extends beyond site ref: AKR/15. The Assessment identifies that the site is within 400-600m of three heritage assets, including the Church of St. Bartholomew, which is Grade II* Listed.</p> <p>The Assessment states that development of this site which extends over the ridge onto a north-west facing slope in open country will impose a substantial visual impact on the surrounding valley landscape and substantial harm to the local landscape character. Thus, the visually isolated setting of the designated and undesignated heritage assets will also be similarly compromised from the north and west directions.</p> <p>The above assessment is disputed by Taylor Wimpey. As set out in Chapter 4 of this Representation, the site retains a good connection with the existing settlement edge, including existing housing which sets a relevant context for residential development on the site. The site is also situated directly adjacent to the road network in the form of the A451 (Dunley Road) and the local road network of Ribbesford Road and Rectory Lane. Other opportunities for the site relate to existing vegetation in and on the boundaries of the site and the chance to retain and enhance these as part of the green infrastructure network.</p> <p>The southern and eastern parts of the site present opportunities for</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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								<p>development to come forward that tie into the existing settlement pattern of Areley Kings and working with the landform and existing green infrastructure. Together this creates a comprehensive network of green infrastructure and open space that provide a framework to the development envelope of built form. This strategy will help integrate the proposals into the landscape and will mitigate potential impacts.</p> <p>Ultimately, the public benefits of the development would be assessed against any perceived harm to the designated heritage assets as per the provisions of the NPPF.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS265</a>	Policy AM1.19 Viability Assessment	Object		No		Justified Effective	<p>This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 'Land off Ribbesford Road / Rectory Lane'. However, the land which is being promoted for development by Taylor Wimpey extends northwards beyond Site.</p> <p>Wyre Forest District Council has updated its Infrastructure Delivery Plan (IDP) in its entirety, with the June 2019 version superseding previous iterations. A 'Pre- Submission Viability Note' has also been prepared in support of the Local Plan, which effectively serves as an update to the Local Plan Viability Assessment Update, October 2018 and the Local Plan Viability Assessment, May 2017. The Note considers changes to National Planning Policy and Guidance, as well as the impact of the updated information concerning the Strategic Sites to be included in the Plan.</p> <p>These two documents are considered together within this representation for ease, as they are intrinsically linked.</p> <p>The Viability Assessment Note identifies that the strategic infrastructure and mitigation costs are "<i>officers' best estimates as at May 2019 and tend to be maximum costs, based on worst case scenarios.</i>" The results of these estimates are significant, in that the Note identifies at Table 4.7 that none of the strategic sites are viable when applying full policy requirements and the entire burden of identified developer contributions.</p> <p>Given the fact that National Planning Policy and Planning Practice Guidance have both been recently updated in respect of demonstrating deliverability, it is wholly unacceptable that the strategic housing allocations which form the foundation of housing</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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								<p>provision within the Local Plan Review are underpinned by ‘best estimates’. Furthermore, the Note has also not been updated to reflect the recent changes to the Community Infrastructure Levy Regulations, specifically, the Removal of Regulation 123 and ‘pooling restrictions’.</p> <p>The Note presents a number of scenarios which may be implemented in order to improve the viability of sites, most notably, a reduction in the affordable housing requirement from 30% to 25% and an increase in the net developable area of sites. The reduction of the affordable housing requirement to 25% in respect of strategic sites is considered sound; however, evidence suggests that this could in fact be reduced further still.</p> <p>Nevertheless, it remains that these calculations are founded upon S106 estimates by officers and not detailed infrastructure costs, cross referenced to the Infrastructure Delivery Plan (IDP) which itself should include evidenced costs. It is also not clear which elements of transport infrastructure relate to allocated sites.</p> <p>At Table 3A, the IDP identifies a number of strategic infrastructure costs, including potential funding sources against each cost. A variety of funding sources are identified, aside from developer contributions. However, it is not clear whether these potential funding sources are considered within the Viability Note, which appears to disseminate the identified costs through developer contributions only. It accordingly appears that strategic infrastructure costs are being disproportionately afforded to strategic sites, thus resulting in sites being considered unviable. In addition, it is incorrectly assumed that all strategic infrastructure costs will be borne by the development industry which is wholly unrealistic. This results in an unrealistic scenario rather than a worst-case scenario.</p> <p>In respect of the strategic transport infrastructure costs there are a range of opportunities, including through HIF and Pinch Point Funding to deliver many of the identified projects. Whilst these are noted within the updated IDP, it is assumed they will make no meaningful contribution through the viability modelling.</p> <p>The Note concludes the increase in strategic infrastructure costs has caused the viability of the Strategic Sites to worsen. The report also identifies a number of policy changes that should be considered to improve viability:</p>			

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								<ul style="list-style-type: none"> <li>To consider increasing the number of units on the sites – although this will also impact on the infrastructure and mitigation requirements;</li> <li>To consider other sources of funding (for example HIF bids);</li> <li>Reconsider the preference for social rented rather than affordable rent;</li> <li>Reconsider the strategic infrastructure and mitigation requirements;</li> <li>Reconsider the overall affordable housing requirements; and</li> <li>Reconsider the density requirements.”</li> </ul> <p>The Council has undertaken no further consideration of these recommended options related to emerging policy and identified no proposed changes in light of these recommended options to the Pre-Submission Local Plan. In addition, it is not understood how a clear decision can be made in respect of the viability of housing allocations until specific, justified and evidenced developer contributions are identified through the IDP and subject to further viability testing.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS271</a>	Policy AM1.4 5 Year Housing Land Supply Evidence Base 2019	Comment		No		Justified	<p>This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 ‘Land off Ribbesford Road / Rectory Lane’. However, the land which is being promoted for development by Taylor Wimpey extends northwards beyond Site.</p> <p>Pegasus Group has previously commented upon the Sites Selection Paper (October 2018) and the Sustainability Appraisal (October 2018) and their scoring of Site Ref: AKR/15. The conclusions within the Sites Selection Paper (August 2019) and Sustainability Appraisal (July 2019) remain unaltered in respect of this site and therefore our previous comments remain, namely:</p> <p>The previous iterations of the Sustainability Appraisal findings are inconsistent with one another as a number of criteria have been amended between the 2017 and 2018 iterations without justification, including;</p> <p>Accessibility to local services – site reduced from ‘single plus’ to ‘zero’ score, despite services and facilities provision in locality remaining the same;</p> <ul style="list-style-type: none"> <li>Meeting housing need – score reduced from ‘double plus’ to ‘single plus’, despite site development capacity remaining the</li> </ul>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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								<p>same; and</p> <ul style="list-style-type: none"> <li>Biodiversity – score reduced from ‘zero’ to ‘single negative’, despite no further survey work having been undertaken.</li> </ul> <p>It is therefore considered that the site selection process is not clear and transparent, and that weighting and planning judgements appear to have been applied to determine the site allocations, rather than utilising the evidence base as prepared.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS280</a>	Paragraph 1.19 Viability Note 2019	Object		No		Justified Effective	<p><b>Infrastructure Delivery Plan (June 2019) and Viability Assessment Note (June 2019)</b></p> <p>2.4 Wyre Forest District Council has updated its Infrastructure Delivery Plan (IDP) in its entirety, with the June 2019 version superseding previous iterations. A ‘Pre- Submission Viability Note’ has also been prepared in support of the Local Plan, which effectively serves as an update to the Local Plan Viability Assessment Update, October 2018 and the Local Plan Viability Assessment, May 2017. The Note considers changes to National Planning Policy and Guidance, as well as the impact of the updated information concerning the Strategic Sites to be included in the Plan.</p> <p>2.5 These two documents are considered together within this representation for ease, as they are intrinsically linked.</p> <p>2.6 Firstly, it should be noted that a number of assumptions contained within the Viability Note do not correspond to those considered more accurate or appropriate by Taylor Wimpey. However the conclusions reached in the Viability Note on the ability of sites OC/6 and OC/13N to deliver the scale of planning gain and strategic infrastructure currently anticipated are considered to be accurate and reflect the disproportionate requirement being proposed. Taylor Wimpey’s assumptions, where these differ, are set out at <b>Appendix 6</b>.</p> <p>2.7 In addition, the Viability Assessment Note identifies that the strategic infrastructure and mitigation costs are “<i>officers’ best estimates as at May 2019 and tend to be maximum costs, based on worst case scenarios.</i>” The results of these estimates are significant, in that the Note identifies at Table 4.7 that none of the strategic sites are viable, including OC/6 and OC/13N when applying full policy requirements and the entire burden of identified developer contributions.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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								<p>2.8 Given the fact that National Planning Policy and Planning Practice Guidance have both been recently updated in respect of demonstrating deliverability, it is wholly unacceptable that the strategic housing allocations which form the foundation of housing provision within the Local Plan Review are underpinned by ‘best estimates.’ Furthermore, the Note has also not been updated to reflect the recent changes to the Community Infrastructure Levy Regulations, specifically, the Removal of Regulation 123 and ‘pooling restrictions.’</p> <p>2.9 The Note presents a number of scenarios which may be implemented in order to improve the viability of sites, most notably, a reduction in the affordable housing requirement from 30% to 25% and an increase in the net developable area of sites. Whilst the reduction of the affordable housing requirement to 25% is supported, the evidence would support a further reduction for Lea Castle Village and Kidderminster Eastern Extension (including OC/6 and OC/13N).</p> <p>2.10 Nevertheless, it remains that these calculations are founded upon S106 estimates by officers and not detailed infrastructure costs, cross referenced to the Infrastructure Delivery Plan (IDP) which itself should include evidenced costs. It is questioned whether these identified costs are accurate or whether they are overly cautious estimates heavily weighted by optimism bias. It is also not clear which elements of transport infrastructure relate to allocated sites and whether these costs have been artificially loaded upon the strategic allocations. This appears to be particularly the case in respect of the transport projects identified.</p> <p>2.11 At Table 3A, the IDP identifies a number of strategic infrastructure costs, including potential funding sources against each cost. A variety of funding sources are identified, aside from developer contributions. However, it is not clear whether these potential funding sources are considered within the Viability Note, which appears to disseminate the identified costs through developer contributions only. It accordingly appears that strategic infrastructure costs are being disproportionately afforded to strategic sites, thus resulting in sites being considered unviable. In addition, it is incorrectly assumed that all strategic infrastructure costs will be borne by the development industry which is wholly unrealistic. This results in an unrealistic scenario rather than a worst-case scenario.</p> <p>2.12 In respect of the strategic transport infrastructure costs there are a range of opportunities, including through HIF and Pinch Point Funding to deliver many of the identified projects. Whilst these are</p>			



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								<p>noted within the updated IDP, it is assumed they will make no meaningful contribution through the viability modelling.</p> <p>2.13 The Note concludes the increase in strategic infrastructure costs has caused the viability of the Strategic Sites to worsen. The report also identifies a number of policy changes that should be considered to improve viability:</p> <ul style="list-style-type: none"> <li>• <i>a. To consider increasing the number of units on the sites – although this will also impact on the infrastructure and mitigation requirements;</i></li> <li>• <i>b. To consider other sources of funding (for example HIF bids);</i></li> <li>• <i>c. Reconsider the preference for social rented rather than affordable rent;</i></li> <li>• <i>d. Reconsider the strategic infrastructure and mitigation requirements;</i></li> <li>• <i>e. Reconsider the overall affordable housing requirements; and</i></li> <li>• <i>f. Reconsider the density requirements.”</i></li> </ul> <p>2.14 The Council has undertaken no further consideration of these recommended options related to emerging policy and identified no proposed changes in light of these recommended options to the Pre-Submission Local Plan. In addition, it is not understood how a clear decision can be made in respect of the viability of housing allocations until specific, justified and evidenced developer contributions are identified through the IDP and subject to further viability testing.</p> <p>2.15 Taylor Wimpey will continue to engage with both Wyre Forest District Council and Worcestershire County Council in respect of an outline planning application at land at Comberton Road and to determine the appropriate obligations:</p> <ul style="list-style-type: none"> <li>• Necessary to make the development acceptable in planning terms;</li> <li>• Directly related to the development; and</li> <li>• Fairly and reasonable related in scale and kind to the</li> </ul>			

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Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								development.			

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Taylor Wimpey West Midlands	<a href="#">ALPPS232</a>	Paragraph AM1.19 - HELAA 2019 (Evidence Base)	Object		No		Justified	<p>This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'.</p> <p><b>Housing and Economic Land Availability Assessment Update (August 2019); Stourport HELAA (August 2019)</b></p> <p>Land at Bewdley Road North is identified within the HELAA updated as Site Ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'. The site is assessed against a number of constraints, with the only identified constraint as being that the site is currently located within the Green Belt.</p> <p>The site is identified as benefitting from 'reasonable' access to local facilities.</p> <p>Promotional material previously submitted by Pegasus Group on behalf on Taylor Wimpey has demonstrated that the site actually benefits from 'good' access to services and facilities and it is submitted that this assessment should be reconsidered.</p> <p>It is contented that, overall, the HELAA assessment demonstrates the suitability of the site for residential development and it is therefore considered that Wyre Forest District Council should reconsider that inclusion of the site within the Local Plan Review as an allocation.</p> <p>An extract of the HELAA assessment for Land at Bewdley Road North is included at <b>Appendix 1</b> of this Representation.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Taylor Wimpey West Midlands	<a href="#">ALPPS241</a>	AM1.19 - HELAA 2019	Comment					<p>This representation relates to land at Belbroughton Road, Blakedown, which is within the control of Taylor Wimpey. This land has not previously been promoted through the Local Plan Review process. A small section (approximately 1ha) of the site is included within the Rural East HELAA (August 2019) as Site Ref: WFR/CB/4 'Land Adjacent to 77 Belbroughton Road'.</p> <p>A small section (approximately 1ha) of the site is included within the Rural East HELAA (August 2019) as Site Ref: WFR/CB/4 'Land Adjacent to 77 Belbroughton Road'.</p> <p>This smaller site is assessed against a number of constraints, with the only identified constraint as being that the site is currently located</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to</p>

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								<p>within the Green Belt. A tree subject to a tree preservation order is identified as being adjacent to the site. However, any development of the site would easily be capable of retaining this tree and not encroaching within its root protection area.</p> <p>The wider site area under control by Taylor Wimpey is also free of development constraints. The only additional consideration is the presence of a local wildlife site immediately beyond the northern site boundary, comprising the series of connected pools which ultimately drain into the River Stour. Development of the site is capable of coming forward in such a way that this off-site asset is protected and conserved, commensurate with its status.</p> <p>Overall, the site is considered to be suitable for residential development.</p> <p>An extract of the HELAA assessment for Land Adjacent to 77 Belbroughton Road (Site Ref: WFR/CB/4) is included as part of this Representation</p>			the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	<a href="#">ALPPS243</a>	AM1.19 Viability Note	Object		No		Effective	<p>This representation relates to land at Belbroughton Road, Blakedown, which is within the control of Taylor Wimpey. This land has not previously been promoted through the Local Plan Review process. A small section (approximately 1ha) of the site is included within the Rural East HELAA (August 2019) as Site Ref: WFR/CB/4 'Land Adjacent to 77 Belbroughton Road'.</p> <p>Wyre Forest District Council has updated its Infrastructure Delivery Plan (IDP) in its entirety, with the June 2019 version superseding previous iterations. A 'Pre- Submission Viability Note' has also been prepared in support of the Local Plan, which effectively serves as an update to the Local Plan Viability Assessment Update, October 2018 and the Local Plan Viability Assessment, May 2017. The Note considers changes to National Planning Policy and Guidance, as well as the impact of the updated information concerning the Strategic Sites to be included in the Plan.</p> <p>These two documents are considered together within this representation for ease, as they are intrinsically linked.</p> <p>The Viability Assessment Note identifies that the strategic infrastructure and mitigation costs are "officers' best estimates as at May 2019 and tend to be maximum costs, based on worst case scenarios." The results of these estimates are significant, in that the</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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								<p>Note identifies at Table 4.7 that none of the strategic sites are viable when applying full policy requirements and the entire burden of identified developer contributions.</p> <p>Given the fact that National Planning Policy and Planning Practice Guidance have both been recently updated in respect of demonstrating deliverability, it is wholly unacceptable that the strategic housing allocations which form the foundation of housing provision within the Local Plan Review are underpinned by '<i>best estimates</i>'. Furthermore, the Note has also not been updated to reflect the recent changes to the Community Infrastructure Levy Regulations, specifically, the Removal of Regulation 123 and 'pooling restrictions'.</p> <p>The Note presents a number of scenarios which may be implemented in order to improve the viability of sites, most notably, a reduction in the affordable housing requirement from 30% to 25% and an increase in the net developable area of sites. The reduction of the affordable housing requirement to 25% in respect of strategic sites is considered sound; however, evidence suggests that this could in fact be reduced further still.</p> <p>Nevertheless, it remains that these calculations are founded upon S106 estimates by officers and not detailed infrastructure costs, cross referenced to the Infrastructure Delivery Plan (IDP) which itself should include evidenced costs. It is also not clear which elements of transport infrastructure relate to allocated sites.</p> <p>At Table 3A, the IDP identifies a number of strategic infrastructure costs, including potential funding sources against each cost. A variety of funding sources are identified, aside from developer contributions. However, it is not clear whether these potential funding sources are considered within the Viability Note, which appears to disseminate the identified costs through developer contributions only. It accordingly appears that strategic infrastructure costs are being disproportionately afforded to strategic sites, thus resulting in sites being considered unviable. In addition, it is incorrectly assumed that all strategic infrastructure costs will be borne by the development industry which is wholly unrealistic. This results in an unrealistic scenario rather than a worst-case scenario.</p> <p>In respect of the strategic transport infrastructure costs there are a range of opportunities, including through HIF and Pinch Point Funding to deliver many of the identified projects. Whilst these are noted within the updated IDP, it is assumed they will make no meaningful</p>			

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								<p>contribution through the viability modelling.</p> <p>The Note concludes the increase in strategic infrastructure costs has caused the viability of the Strategic Sites to worsen. The report also identifies a number of policy changes that should be considered to improve viability:</p> <ol style="list-style-type: none"> <li>1. <i>“To consider increasing the number of units on the sites – although this will also impact on the infrastructure and mitigation requirements;</i></li> <li>2. <i>To consider other sources of funding (for example HIF bids);</i></li> <li>3. <i>Reconsider the preference for social rented rather than affordable rent;</i></li> <li>4. <i>Reconsider the strategic infrastructure and mitigation requirements;</i></li> <li>5. <i>Reconsider the overall affordable housing requirements; and</i></li> <li>6. <i>Reconsider the density requirements.”</i></li> </ol> <p>The Council has undertaken no further consideration of these recommended options related to emerging policy and identified no proposed changes in light of these recommended options to the Pre-Submission Local Plan. In addition, it is not understood how a clear decision can be made in respect of the viability of housing allocations until specific, justified and evidenced developer contributions are identified through the IDP and subject to further viability testing.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS245</a>	AM1.19 - Green Belt Review 2016 and 2018	Comment					<p>This representation relates to land at Belbroughton Road, Blakedown, which is within the control of Taylor Wimpey. This land has not previously been promoted through the Local Plan Review process. A small section (approximately 1ha) of the site is included within the Rural East HELAA (August 2019) as Site Ref: WFR/CB/4 ‘Land Adjacent to 77 Belbroughton Road’.</p> <p>The site is not individually assessed as part of the Green Belt Review Analysis of Sites. However, the Strategic Analysis assesses 59 District-wide strategic parcels, which are ‘broad brush’ and would ordinarily be refined before making any decision on whether or not to release a site for development. The Analysis concludes whether parcels make a ‘significant contribution’, a ‘contribution’ or a ‘limited contribution’ to the purposes of the Green Belt.</p> <p>The site is identified within Strategic Parcel ‘E4’, which covers land between Birmingham Road (A456), Belbroughton Road (B4188) and Stourbridge Road (A450) to the east of Blakedown. Overall, Parcel E4 is</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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								<p>stated as making a ‘contribution’ towards the purposes of the Green Belt. However, it should be noted that this is by far the most common typology, with no sites being identified as making a ‘limited contribution’. Those parcels to the west of Kidderminster are identified in making a ‘significant contribution’, predominantly due to their role in preventing Kidderminster merging with Stourport-on-Severn and Bewdley.</p> <p>Specifically, the Review contains the following high-level assessment of the Parcel against the purposes of the Green Belt and states:</p> <p><i>“Whilst the parcel retains a largely open rural character, its location between two main roads means that it is relatively accessible and thus vulnerable to change through incremental urbanisation, particularly to the south and west where it contains Blakedown.”</i></p> <p><b>Sprawl - Contribution</b></p> <p><b>Merger – Limited Contribution</b></p> <p><b>Encroachment - Contribution</b></p> <p><b>Setting - Limited Contribution</b></p> <p><b>Regeneration - Limited Contribution</b></p> <p><b>Overall - Contribution</b></p> <p>An assessment of Land at Belbroughton Road against the purposes of the Green Belt is undertaken in Chapter 4 of this Representation.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS258</a>	Policy AM1.19 Infrastructure Delivery Plan	Object		No		Justified Effective	<p>This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 ‘Land off Ribbesford Road / Rectory Lane’. However, the land which is being promoted for development by Taylor Wimpey extends northwards beyond Site.</p> <p>Wyre Forest District Council has updated its Infrastructure Delivery Plan (IDP) in its entirety, with the June 2019 version superseding previous iterations. A ‘Pre- Submission Viability Note’ has also been prepared in support of the Local Plan, which effectively serves as an update to the Local Plan Viability Assessment Update, October 2018 and the Local Plan Viability Assessment, May 2017. The Note considers</p>		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.

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								<p>changes to National Planning Policy and Guidance, as well as the impact of the updated information concerning the Strategic Sites to be included in the Plan.</p> <p>These two documents are considered together within this representation for ease, as they are intrinsically linked.</p> <p>The Viability Assessment Note identifies that the strategic infrastructure and mitigation costs are “<i>officers’ best estimates as at May 2019 and tend to be maximum costs, based on worst case scenarios.</i>” The results of these estimates are significant, in that the Note identifies at Table 4.7 that none of the strategic sites are viable when applying full policy requirements and the entire burden of identified developer contributions.</p> <p>Given the fact that National Planning Policy and Planning Practice Guidance have both been recently updated in respect of demonstrating deliverability, it is wholly unacceptable that the strategic housing allocations which form the foundation of housing provision within the Local Plan Review are underpinned by ‘<i>best estimates</i>’. Furthermore, the Note has also not been updated to reflect the recent changes to the Community Infrastructure Levy Regulations, specifically, the Removal of Regulation 123 and ‘pooling restrictions’.</p> <p>The Note presents a number of scenarios which may be implemented in order to improve the viability of sites, most notably, a reduction in the affordable housing requirement from 30% to 25% and an increase in the net developable area of sites. The reduction of the affordable housing requirement to 25% in respect of strategic sites is considered sound; however, evidence suggests that this could in fact be reduced further still.</p> <p>Nevertheless, it remains that these calculations are founded upon S106 estimates by officers and not detailed infrastructure costs, cross referenced to the Infrastructure Delivery Plan (IDP) which itself should include evidenced costs. It is also not clear which elements of transport infrastructure relate to allocated sites.</p> <p>At Table 3A, the IDP identifies a number of strategic infrastructure costs, including potential funding sources against each cost. A variety of funding sources are identified, aside from developer contributions. However, it is not clear whether these potential funding sources are considered within the Viability Note, which appears to disseminate the</p>			Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.



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								<p>identified costs through developer contributions only. It accordingly appears that strategic infrastructure costs are being disproportionately afforded to strategic sites, thus resulting in sites being considered unviable. In addition, it is incorrectly assumed that all strategic infrastructure costs will be borne by the development industry which is wholly unrealistic. This results in an unrealistic scenario rather than a worst-case scenario.</p> <p>In respect of the strategic transport infrastructure costs there are a range of opportunities, including through HIF and Pinch Point Funding to deliver many of the identified projects. Whilst these are noted within the updated IDP, it is assumed they will make no meaningful contribution through the viability modelling.</p> <p>The Note concludes the increase in strategic infrastructure costs has caused the viability of the Strategic Sites to worsen. The report also identifies a number of policy changes that should be considered to improve viability:</p> <ul style="list-style-type: none"> <li>• <i>To consider increasing the number of units on the sites – although this will also impact on the infrastructure and mitigation requirements;</i></li> <li>• <i>To consider other sources of funding (for example HIF bids);</i></li> <li>• <i>Reconsider the preference for social rented rather than affordable rent;</i></li> <li>• <i>Reconsider the strategic infrastructure and mitigation requirements;</i></li> <li>• <i>Reconsider the overall affordable housing requirements; and</i></li> <li>• <i>Reconsider the density requirements.”</i></li> </ul> <p>The Council has undertaken no further consideration of these recommended options related to emerging policy and identified no proposed changes in light of these recommended options to the Pre-Submission Local Plan. In addition, it is not understood how a clear decision can be made in respect of the viability of housing allocations until specific, justified and evidenced developer contributions are identified through the IDP and subject to further viability testing.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS264</a>	Policy AM1.19 HELAA Evidence	Object		No		Justified	This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 'Land off Ribbesford Road / Rectory Lane'.	It is contented that, overall, the HELAA	Yes	Taylor Wimpey considers it necessary

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		Base						<p>However, the land which is being promoted for development by Taylor Wimpey extends northwards beyond Site.</p> <p>The southern extent of Land at Rectory Lane is identified within the HELAA updated as Site Ref: AKR/15 'Land off Ribbesford Road / Rectory Lane'. The site is assessed against a number of constraints, with no constraints identified as being on site. The site is identified as benefitting from 'reasonable' access to local facilities.</p> <p>Promotional material previously submitted by Pegasus Group on behalf on Taylor Wimpey has demonstrated that the site actually benefits from 'good' access to services and facilities and it is submitted that this assessment should be reconsidered.</p> <p>It is contented that, overall, the HELAA assessment demonstrates the suitability of the site for residential development and it is therefore considered that Wyre Forest District Council should reconsider that inclusion of the site within the Local Plan Review as an allocation.</p> <p>An extract of the HELAA assessment for Land off Ribbesford Road / Rectory Lane' is included at Appendix 2 in the attached document.</p>	assessment demonstrates the suitability of the site for residential development and it is therefore considered that Wyre Forest District Council should reconsider that inclusion of the site within the Local Plan Review as an allocation.		to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.  Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	<a href="#">ALPPS279</a>	Paragraph 1.19 Infrastructure Delivery Plan	Object		No		Justified Effective	<p><b>Infrastructure Delivery Plan (June 2019) and Viability Assessment Note (June 2019)</b></p> <p>2.4 Wyre Forest District Council has updated its Infrastructure Delivery Plan (IDP) in its entirety, with the June 2019 version superseding previous iterations. A 'Pre- Submission Viability Note' has also been prepared in support of the Local Plan, which effectively serves as an update to the Local Plan Viability Assessment Update, October 2018 and the Local Plan Viability Assessment, May 2017. The Note considers changes to National Planning Policy and Guidance, as well as the impact of the updated information concerning the Strategic Sites to be included in the Plan.</p> <p>2.5 These two documents are considered together within this representation for ease, as they are intrinsically linked.</p> <p>2.6 Firstly, it should be noted that a number of assumptions contained within the Viability Note do not correspond to those considered more accurate or appropriate by Taylor Wimpey. However the conclusions reached in the Viability Note on the ability of</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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								<p>sites OC/6 and OC/13N to deliver the scale of planning gain and strategic infrastructure currently anticipated are considered to be accurate and reflect the disproportionate requirement being proposed. Taylor Wimpey’s assumptions, where these differ, are set out at <b>Appendix 6</b>.</p> <p>2.7 In addition, the Viability Assessment Note identifies that the strategic infrastructure and mitigation costs are “<i>officers’ best estimates as at May 2019 and tend to be maximum costs, based on worst case scenarios.</i>” The results of these estimates are significant, in that the Note identifies at Table 4.7 that none of the strategic sites are viable, including OC/6 and OC/13N when applying full policy requirements and the entire burden of identified developer contributions.</p> <p>2.8 Given the fact that National Planning Policy and Planning Practice Guidance have both been recently updated in respect of demonstrating deliverability, it is wholly unacceptable that the strategic housing allocations which form the foundation of housing provision within the Local Plan Review are underpinned by ‘<i>best estimates.</i>’ Furthermore, the Note has also not been updated to reflect the recent changes to the Community Infrastructure Levy Regulations, specifically, the Removal of Regulation 123 and ‘pooling restrictions.’</p> <p>2.9 The Note presents a number of scenarios which may be implemented in order to improve the viability of sites, most notably, a reduction in the affordable housing requirement from 30% to 25% and an increase in the net developable area of sites. Whilst the reduction of the affordable housing requirement to 25% is supported, the evidence would support a further reduction for Lea Castle Village and Kidderminster Eastern Extension (including OC/6 and OC/13N).</p> <p>2.10 Nevertheless, it remains that these calculations are founded upon S106 estimates by officers and not detailed infrastructure costs, cross referenced to the Infrastructure Delivery Plan (IDP) which itself should include evidenced costs. It is questioned whether these identified costs are accurate or whether they are overly cautious estimates heavily weighted by optimism bias. It is also not clear which elements of transport infrastructure relate to allocated sites and whether these costs have been artificially loaded upon the strategic allocations. This appears to be particularly the case in respect of the transport projects identified.</p> <p>2.11 At Table 3A, the IDP identifies a number of strategic</p>			

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								<p>infrastructure costs, including potential funding sources against each cost. A variety of funding sources are identified, aside from developer contributions. However, it is not clear whether these potential funding sources are considered within the Viability Note, which appears to disseminate the identified costs through developer contributions only. It accordingly appears that strategic infrastructure costs are being disproportionately afforded to strategic sites, thus resulting in sites being considered unviable. In addition, it is incorrectly assumed that all strategic infrastructure costs will be borne by the development industry which is wholly unrealistic. This results in an unrealistic scenario rather than a worst-case scenario.</p> <p>2.12 In respect of the strategic transport infrastructure costs there are a range of opportunities, including through HIF and Pinch Point Funding to deliver many of the identified projects. Whilst these are noted within the updated IDP, it is assumed they will make no meaningful contribution through the viability modelling.</p> <p>2.13 The Note concludes the increase in strategic infrastructure costs has caused the viability of the Strategic Sites to worsen. The report also identifies a number of policy changes that should be considered to improve viability:</p> <ul style="list-style-type: none"> <li>• <i>a. To consider increasing the number of units on the sites – although this will also impact on the infrastructure and mitigation requirements;</i></li> <li>• <i>b. To consider other sources of funding (for example HIF bids);</i></li> <li>• <i>c. Reconsider the preference for social rented rather than affordable rent;</i></li> <li>• <i>d. Reconsider the strategic infrastructure and mitigation requirements;</i></li> <li>• <i>e. Reconsider the overall affordable housing requirements; and</i></li> <li>• <i>f. Reconsider the density requirements.”</i></li> </ul> <p>2.14 The Council has undertaken no further consideration of these recommended options related to emerging policy and identified no proposed changes in light of these recommended options to the Pre-Submission Local Plan. In addition, it is not understood how a clear decision can be made in respect of the viability of housing allocations until specific, justified and evidenced developer contributions are identified through the IDP and subject to further viability testing.</p> <p>2.15 Taylor Wimpey will continue to engage with both Wyre Forest District Council and Worcestershire County Council in respect of an</p>			

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								<p>outline planning application at land at Comberton Road and to determine the appropriate obligations:</p> <ul style="list-style-type: none"> <li>• Necessary to make the development acceptable in planning terms;</li> <li>• Directly related to the development; and</li> <li>• Fairly and reasonable related in scale and kind to the development.</li> </ul>			
Taylor Wimpey West Midlands	<a href="#">ALPPS281</a>	Paragraph 1.19 Transport Evidence Paper	Comment					<p><b>Transport Evidence Base Paper (June 2019)</b></p> <p>2.3 Taylor Wimpey is pleased to note that this updated Evidence Base Paper includes reference to both OC/6 and OC/13N which appeared as an omission in the previously published evidence.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Taylor Wimpey West Midlands	<a href="#">ALPPS233</a>	Paragraph AM1.20 - Sustainability Appraisal 2019	Object		No		Justified	<p>This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'.</p> <p><b>Sites Selection Paper (August 2019) and Sustainability Appraisal (July 2019)</b></p> <p>Pegasus Group has previously commented upon the Sites Selection Paper (October 2018) and the Sustainability Appraisal (October 2018)</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p>

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								<p>and their scoring of Site Ref: LI/5. The conclusions within the Sites Selection Paper (August 2019) and Sustainability Appraisal (July 2019) remain unaltered in respect of this site and therefore our previous comments remain, namely:</p> <p>The previous iterations of the Sustainability Appraisal findings are inconsistent with one another as a number of criteria have been amended between the 2017 and 2018 iterations without justification, including;</p> <ul style="list-style-type: none"> <li>• Accessibility to local services – site reduced from ‘double plus’ to ‘zero’ score, despite services and facilities provision in locality and site accessibility remaining the same;</li> <li>• Meeting housing need – score reduced from ‘double plus’ to ‘single plus’, despite site development capacity remaining the same;</li> <li>• Biodiversity – score reduced from ‘zero’ to ‘single negative’, despite no further survey work having been undertaken.</li> </ul> <p>It is therefore considered that the site selection process is not clear and transparent, and that weighting and planning judgements appear to have been applied to determine the site allocations, rather than utilising the evidence base as prepared.</p>			Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	<a href="#">ALPPS250</a>	AM1.20 Sustainability Appraisal	Comment					<p>This representation relates to land at Belbroughton Road, Blakedown, which is within the control of Taylor Wimpey. This land has not previously been promoted through the Local Plan Review process. A small section (approximately 1ha) of the site is included within the Rural East HELAA (August 2019) as Site Ref: WFR/CB/4 ‘Land Adjacent to 77 Belbroughton Road’.</p> <p>The Sites Selection Paper and Sustainability Appraisal do not consider the site, as it has not been previously promoted for development.</p> <p>Pegasus Group has prepared an assessment of the wider site against the criteria contained within the Sustainability Appraisal, including the relevant categories of impact significance. This is included overleaf.</p> <p>The site is capable of delivering upwards of 400 new homes to meet an identified market and affordable housing need within Wyre Forest District. Given the extent of the site, there is also potential to deliver a social/community facility, dependent on identified need, thus</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

**APPENDIX D: AMENDMENTS TO THE PRE-SUBMISSION PUBLICATION DOCUMENT (JULY 2019) - CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER AM1 : INTRODUCTION**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC ?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
								<p>furthering the sustainability of Blakedown as a settlement overall.</p> <p>The development of the site will support existing rail and bus services at Blakedown, thus reducing dependency on the private car. In accordance with the NPPF, the development of the site will deliver net gains for biodiversity.</p> <p>Overall, Land at Belbroughton Road has the potential to deliver positive outcomes when compared to the current situation.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS266</a>	Policy AM1.20 Sustainability Appraisal	Object		No		Justified Effective	<p>This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 'Land off Ribbesford Road / Rectory Lane'. However, the land which is being promoted for development by Taylor Wimpey extends northwards beyond Site.</p> <p>Pegasus Group has previously commented upon the Sites Selection Paper (October 2018) and the Sustainability Appraisal (October 2018) and their scoring of Site Ref: AKR/15. The conclusions within the Sites Selection Paper (August 2019) and Sustainability Appraisal (July 2019) remain unaltered in respect of this site and therefore our previous comments remain, namely:</p> <p>The previous iterations of the Sustainability Appraisal findings are inconsistent with one another as a number of criteria have been amended between the 2017 and 2018 iterations without justification, including;</p> <ul style="list-style-type: none"> <li>• Accessibility to local services – site reduced from 'single plus' to 'zero' score, despite services and facilities provision in locality remaining the same;</li> <li>• Meeting housing need – score reduced from 'double plus' to 'single plus', despite site development capacity remaining the same; and</li> <li>• Biodiversity – score reduced from 'zero' to 'single negative', despite no further survey work having been undertaken.</li> </ul>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

**APPENDIX D: AMENDMENTS TO THE PRE-SUBMISSION PUBLICATION DOCUMENT (JULY 2019) - CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER AM6: A SUSTAINABLE FUTURE: DEVELOPMENT STRATEGY**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
Campaign to Protect Rural England  Peter King	<a href="#">ALPPS16</a>	AM6A Development Needs	Object		No		Justified Effective Consistent with National Policy	<p>The Plan is unsound and not consistent with national policy because it uses 2016 SNPP rather than the generally (though apparently not locally) 2014 ones. Every council and LEP seeks to achieve growth very considerably in excess of the national projections, though Strategic Economic Plans (SEP). Such plans are aspirational (and probably undeliverable). They are thus fundamentally unsound as an evidential basis for a Plan. Such SEPs in aggregate are thus unachievable, without the national population increasing by a figure greatly in excess of what is probable, even with the immigration at the high levels of recent years. Any policy that plans for objectives that are fundamentally unachievable must inevitably be unsound and ineffective.</p> <p>The current WFCS has got into difficulties over achieving a 5-year housing land supply by front-loading its housing trajectory and seeking (and failing) to deliver large numbers of houses in the early years of the Core Strategy.</p> <p>We are further concerned that the plan to deliver houses in excess of local need will lead to an increase in unsustainable commuting out of the district (and HMA) into the West Midlands Conurbation.</p> <p>The intention to make the target a minimum would mean that the delivery of 500 or 1000 houses per year would comply with the plan, but would clearly be grossly excessive.</p> <p>We welcome the abandonment of policy AM33.6, which sustains our objection to it; also that of site WA/KF/3, if no other land at Habberley is to be developed.</p> <p>We also welcome the change to AM33.39-40 and to the related policy now AM33.21. We note that Worcestershire Wildlife Trust is in the course of buying Droppingwell Farm, which will join up the Burlish Top and Rifle Range/Devil's Spittleful Nature Reserves. This with the land (subject of the policy) should permanently secure the strategic gap between the District's three towns, except along A451 Stourport Road. The Travelling Showmen's site should however be limited to the area that has in fact been developed.</p>	<p>The housing target should be 248 per year and applied evenly throughout the Plan Period.</p> <p>If minimum targets are to be retained there should be a corresponding provision for a maximum. Housing delivery should be assessed as the average over several years, not according to the outcome of a single year, as delivery will inevitably fluctuate. If the target is consistently greatly exceeded, measures should be taken to limit it, unless there is evidence of decreased dependence on commuting out of the Housing Market Area.</p>	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.
Bloor Homes (Western)	<a href="#">ALPPS71</a>	AM6A	Support	Yes	Yes	Yes		BHW are generally supportive of the overall development needs that have been identified in the Policy, specifically, we have no comment on the overall housing requirement that has been calculated using the standard method. We do, however, support		Yes	As a promoter of an alternative site for residential development in the District we would



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								<p>the introduction of the word 'minimum' in Table AM6.0.1 in the annual housing requirement column, noting that by doing so, the requirement is not a target but a minimum figure that can, and should be exceeded. This would be consistent with the policies of the Framework.</p> <p>We also welcome the introduction of the additional text added to part B of the policy, which confirms that the Council will commit to an early review of the Plan if necessary in order to consider unmet housing needs arising in adjoining authorities, with Footnote 2 specifically referencing the Black Country authorities as being the likely key recipients.</p>			welcome the chance to discuss the merits of the site if there is any indication that alternative or additional sites are needed.
Taylor Wimpey West Midlands	<a href="#">ALPPS51</a>	AM6A	Comment			No	Effective	<p><b>Policy AM6A Development Needs 2016 – 2034</b></p> <p><i>Market Housing</i></p> <p>The Council has prepared a range of technical evidence to inform the preparation of the new Local Plan.</p> <p>To determine the housing requirements for Wyre Forest, the local planning authority has commissioned consultants to identify the appropriate housing need taking into consideration relevant factors identified in the NPPF and Planning Practice Guidance.</p> <p>The Council's Housing Needs Study (HNS 2018) has regards to the Government's standard method for calculating housing need and identifies a minimum 276 dwellings per year utilising the most up-to-date sub-national household projections (2016 SNHP). It is noted that the HNS 2018 considers further scenario analysis to verify whether the figure provided by the Government's standard method is appropriate to Wyre Forest.</p> <p>In our previous representation, concern was raised regarding the Government's stated intention to revert to the 2014 Sub-National Household Projections (SNHP) from the 2016 SNHP when determining housing need. If the Wyre Forest District Council local housing need figure is calculated using the 2014 based SNHP and the latest affordability ratio, the resultant housing need figure is 4,960 (248 dwellings per annum). However, this lower figure would undermine the ability for economic aspirations to be met, reduce the ability for affordable housing needs to be met and would again not take account of vacant properties within the District.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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								<p>It is therefore encouraging to see that, at Policy AM6A and Paragraph AM6.5 of the Amendments to the Pre-Submission Publication Document, the Council continues to commit to utilising the 2016 SNHP, resulting in a (minimum) housing requirement of 5,520 homes (276 per annum). This is justified on grounds that the Council wishes to be ambitious with its housing requirement figure in order to support economic growth and affordable housing delivery. This approach is supported by Taylor Wimpey and facilitated by Planning Practice Guidance, which states at Paragraph: 010 Reference ID 2a-010-20190220:</p> <p>further importance on retaining a higher housing requirement to ensure these needs can be met.</p> <p><i>C2/ Institutional/ Care Home</i></p> <p>3.18 A separate figure of 487 bed spaces for C2 use (Institutional/Care Home bed spaces) is supported and will assist to ensure the specific needs of the population are met. The principle of separating the C2 use requirement from the C3 requirement is supported; however on this basis any consideration of the housing land supply position contained within the housing trajectory should also exclude the C2 use provision.</p> <p><i>Employment Land</i></p> <p>3.19 The Local Plan gives a figure of 29ha of employment land that will be brought forward in the period up to 2036. This requirement is informed largely by the October 2018 Employment Land Study Update (ELS) undertaken by Lichfields, which correctly notes that the Wyre Forest District economy has seen historic sharp job decline since 1997. In addition, the Experian econometric job growth projections appear unduly pessimistic, projecting just a 2.8% growth in jobs between 2016 and 2036. This has informed the proposed 29ha employment land requirement set out within the Local Plan and appears to reflect past trends.</p> <p>3.20 However, a concern with the 29ha employment land requirement is that it does not appear to take into account what could be needed in the event of Wyre Forest seeing stronger economic growth linked to the aspirations of the Local Enterprise Partnerships in which the District lies. For example, the Worcestershire Local Enterprise Partnership's Strategic Economic</p>			

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								<p>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>3.21 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>			
Owl Homes	<a href="#">ALPPS80</a>	PolicyAM6A	Support	Yes	Yes	Yes		<p>Owl Homes is working with the landowners of land off Habberley Road, Bewdley to support proposals for residential development. The site is a proposed allocation in the emerging Local Plan to which these representations relate. Owl Homes supports the Council in proactively seeking growth in its area and in preparing a new Local Plan to enable this.</p> <p>Owl Homes supports the approach set out in Policy AM6A in setting the housing target as 276 dwellings per annum as a minimum. Despite the 2014 population projections showing a need for 248 homes a year, the higher figure has been chosen. This suggests a positive approach to delivering growth and more homes within the area which we strongly support. Further the Policy sets out the commitment to an early review where necessary and in accordance with the NPPF. Owl Homes support this position which is consistent with National Policy which states that relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future (NPPF Para 33).</p>		Yes	To support the Policy approach.
Persimmon Homes Limited	<a href="#">ALPPS148</a>	Policy AM6A Development Needs 2016-2036	Object		No		Positively Prepared Justified Effective	<p>In summary, RPS acknowledges that the Council has followed the updated means of calculating the Local Housing Need ("LHN") for the District, following the Government's standard method in the February 2019 NPPF ("NPPF3"). However, RPS consider that the Council could go further here, and in particular, could seek to adopt a higher figure in order to address shortages in affordable housing in the District, which is higher than the minimum figure derived from the standard method.</p> <p>RPS welcomes the proposed amendment to Policy AM6A (previously 6A) which would qualify the housing requirement on</p>	On this basis, there is clear justification for a housing requirement that is higher than the minimum housing need of 276 homes per year, and even greater	Yes	In order to properly represent the interests of the client.

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

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								<p>the basis of a 'minimum' amount of (net) additional housing to be delivered in the District each year. Furthermore, RPS notes the Council's intention to keep the annual requirement of 276 dwellings unchanged, despite more recent projections suggesting the number should come down based on the standard method formula. In this context, RPS welcomes the intention to continue with, what is in effect, a 'local housing need plus' approach to planning for housing need in Wyre Forest, as set out in amendments to the Plan (paragraph AM6.5 refers). However, RPS suggest that the Council can, and should, go further based on a number of important factors, as addressed below.</p> <p>In terms of the affordable housing need to be addressed through the Plan, the Plan now suggests that the annual (net) need for affordable homes is 158 dwellings per year (paragraph 8.11 refers) at 2018. This is based on an updated Housing Need Study published in September 2018, prepared by Arc4 Ltd, and takes into account all known affordable housing supply in the District up to that date. Against the affordable housing need (whilst less than previous evidence suggested), Policy 8B of the Plan proposes a '<i>minimum annual average target of 90 affordable dwellings</i>' to be delivered during the plan period to 2036. The policy goes on to seek a '<i>minimum of 25% [affordable homes] on sites of 10 or more homes, or sites of an area of 0.5 hectares or more, will generally be required.</i>' RPS also notes that the policy then states that, '<i>Individual site characteristics may mean that this level of provision is not achievable on all development sites...</i>', suggesting that the Council accepts that viability issues may impact on the delivery of affordable housing on certain proposed allocations during the remainder of the plan period.</p> <p>What is clear from this is that there appears to be an inconsistency between the policy objectives seeking to deliver additional affordable homes and the plan strategy to achieve this. Firstly, in terms of the policy objective to deliver 90 affordable homes per year (as a minimum); at a rate of broadly 25% per qualifying development, this could deliver around 1,800 affordable homes between 2016 and 2036. It is already accepted by the Council that not all such sites will deliver the policy requirement and thus will reduce the overall supply against the Plan target. Therefore, the delivery of 1,800 affordable dwellings (minimum) by 2036 is likely to be the maximum that is going to be achieved. Nonetheless, in line with the PPG advice regarding consideration of the total housing figure for the Plan, RPS suggest that a total of 360 dwellings per year would be needed</p>	<p>justification based on the lower need of 248 dwellings using the 2014-base projections. RPS suggests that the uplift required to the preferred minimum local housing need figure should be set at such a level sufficient to provide every opportunity for the preferred affordable housing target to be met year-on-year. Consequently, RPS suggest that the housing requirement should be set at 360 dwellings per year, which would properly and effectively support the delivery of 90 affordable homes per year as a minimum (at 25% as per Policy 8B). The delivery of 90 affordable homes per year would still only represent 57% of the total (net) affordable housing need of</p>		

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								<p>(comprising both private and affordable homes) to have any chance of delivering 90 affordable homes per year (at a rate of 25%)<sup>4</sup>.</p> <p>In comparison, the Plan proposes an overall housing requirement (equal to the local housing need, in this case using the 2016-based official projections) of 276 dwellings per year. As a proxy for the delivery of the additional affordable homes needed in Wyre Forest, at the same policy threshold of 25%, this would only deliver around 1,380 affordable homes up to 2036 (25% of 5,520), or 69 affordable dwellings per year. This is lower than recent average completion rates of affordable housing achieved in the District (96 affordable homers per year based on figures set out in the Plan (paragraph 8.11 refers). Consequently, it is evident that the plan would fail to deliver the necessary numbers of affordable homes required based on the preferred housing requirement of 276 dwellings per year and the affordable housing target of 90 homes per year, a shortfall of 21 affordable homes per year.</p> <p>On this basis, there is clear justification for a housing requirement that is higher than the minimum housing need of 276 homes per year, and even greater justification based on the lower need of 248 dwellings using the 2014-base projections. RPS suggests that the uplift required to the preferred minimum local housing need figure should be set at a level sufficient to provide every opportunity for the preferred affordable housing target to be met year-on-year. <u>Consequently, RPS suggest that the housing requirement should be set at 360 dwellings per year, which would properly and effectively support the delivery of 90 affordable homes per year as a minimum (at 25% as per Policy 8B).</u> The delivery of 90 affordable homes per year would still only represent 57% of the total (net) affordable housing need of 158 dwellings per year based on update evidence published by the Council. This would therefore fall well below meeting the full affordable housing need in Wyre Forest, which RPS recognises could undermine the deliverability of the Plan as a whole.</p> <p>Without applying the adjustment as set out in this submission, RPS argue the Plan (as submitted, and subsequently amended) is not soundly- based, in particular it is not considered to be effective or positively prepared, given the preferred housing requirement clearly undermines the delivery of the Plan policy objective which seeks to deliver ‘additional’ affordable housing in the District. Furthermore, the local housing need planned for is</p>	<p>158 dwellings per year based on update evidence published by the Council. This would therefore fall well below meeting the full affordable housing need in Wyre Forest, which RPS recognises could undermine the deliverability of the Plan as a whole.</p> <p>Without applying the adjustment as set out in this submission, RPS argue the Plan (as submitted, and subsequently amended) is not soundly-based, in particular it is not considered to be effective, given the preferred housing requirement clearly undermines the delivery of the Plan policy objective which seeks to deliver ‘additional’ affordable housing in the District. Furthermore, the local housing</p>		

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								also not positively prepared (being an underestimate of the actual housing needed in Wyre Forest), and also not justified in light of the evidence of affordable housing need in the District.	need planned for is also not positively prepared (being an underestimate of the actual housing needed in Wyre Forest), and also not justified in light of the evidence of affordable housing need in the District.		
Barratt Homes West Midlands	<a href="#">ALPPS153</a>	Policy AM6A, Development Needs 2016-2036	Object	Yes	No	Yes	Positively Prepared Justified Effective	We support the proposal for a 15% flexibility allowance to be built into the Plan in case any of the proposed housing allocations do not deliver. Unforeseen circumstances during the course of the plan period will no doubt mean that certain sites do not come forward as expected. A flexibility allowance is an appropriate way of helping to negate this by ensuring that a range of sites are available for development.	Paragraph A and 6.5 of the Plan should be reworded to confirm that the standard method should be applied using the 2014 household projections. There are, however, a number of circumstances put forward to increase the number of housing requirements above the minimum figure that arises from the standard method as detailed in our response to Form 3.	Yes	The overall housing requirement and its delivery is a fundamental part of the emerging plan. Barratt Homes control one of the largest housing sites within the District and will play a key role in the delivery of the housing requirements. We would like to attend the examination in order to discuss the overall housing requirement and the opportunities that arise from the Plan including a housing requirement that exceeds that that was from the application of the Standard Method.
Gladman	<a href="#">ALPPS130</a>	Policy AM6A	Object	No	No	No	Positively	Policy 6A relates to the development needs of Wyre Forest for		Yes	Gladman's previous

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Developments Ltd Nicole Burnett		Development Needs 2016-2036					Prepared Justified Effective Consistent with National Policy	<p>the period 2016-2036. With regards to net additional dwellings, the current consultation proposes an amendment to insert the word 'minimum' after the 276 annual requirements. Gladman are supportive of the use of the phrase 'minimum' in relation to housing requirements as these should not be seen as a ceiling or cap on the level of development that can come forward. If further sustainable growth over and above the identified requirement can come forward in sustainable locations then this should not be unnecessarily restricted. As such Gladman are supportive of the housing requirement being expressed as a minimum amount to be delivered.</p> <p>Part B of Policy 6A relates to the need for an early review. As noted in Gladman's submissions to the Regulation 19 consultation in December 2018, Gladman consider it prudent for the Local Plan to include a review policy, however this would need to be clear, easily understandable and effective, by setting achievable targets for the completion of a review. The review policy within the Local Plan needs to have specific triggers and timescales in order to ensure that it is a meaningful policy mechanism. The triggers for this review need to be meaningful, have teeth and contain an end date that it is control of the Council. The policy should also include consequences for failing to meet the target dates.</p> <p>Gladman do not consider the amended text within Part B of Policy 6A to be sufficient as it does not provide an effective policy to ensure the delivery of a review in a timely manner. Without clear triggers and timescales it remains unclear if and when a review would actually happen. Gladman's previous Regulation 19 representations make reference to North West Leicestershire Local Plan review policy as an example when considering the Local Plan review mechanism further.</p>			representations with regards the initial regulation 19 consultation still stand as do the site submissions made within these. Given the concerns raised through these combined submissions Gladman would wish to participate at the relevant hearing sessions in due course.
Birmingham City Council Ian Macleod	<a href="#">ALPPS165</a>	Policy AM6A Development Needs 2016-2036	Comment					<p>Birmingham City Council supports the approach in paragraph B and welcomes the amendments to this policy to recognise the obligations set out in the NPPF in identifying housing needs that cannot be met in neighbouring local authorities.</p> <p>Although Wyre Forest District is not part of the of the Birmingham and Black Country Housing Market Area, there are some functional relationships with the West Midlands conurbation in terms of migration and commuting patterns (as the document itself states in paragraph AM6.20). The plan therefore needs to explicitly acknowledge that any additional</p>			

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								<p>housing growth proposed over and above Local Housing Need (LHN), (once all other factors have been taken into account), can be attributed to meeting established unmet need within neighbouring authorities particularly in the conurbation. This includes Birmingham which has established an unmet housing need of 37,900 through the adoption of the Birmingham Development Plan in 2017.</p> <p>This will ensure that the Wyre Forest District Plan is compliant with the NPPF. The commitment to an early review is therefore welcome particularly if subsequent evidence shows continued unmet need when the Local Plans for both the Black Country and Birmingham are reviewed in the future.</p>			
Barratt Homes West Midlands	<a href="#">ALPPS152</a>	Policy AM6A, Development Needs 2016-2036	Object	Yes	No	Yes	Positively Prepared Justified Effective	<p>Policy AM6a – Development Needs advises that provision will be made for a minimum of 276 dpa during the plan period. This level of development exceeds that that arises from the application of the Standard Method using the 2014 household projections. It is advised that the housing requirement within the emerging Plan has been established using the 2016 household projections as a base date. This is considered appropriate as the Council is ambitious with its housing requirement figure in order to support economic growth and affordable housing delivery.</p> <p>The NPPG and Framework are clear in that the Standard Method must be used applying the 2014 household projections. However, it is clear that the application and standard method results in a minimum house requirement only and a housing requirement of 276 dpa to be supported. It is our view that it is entirely appropriate for the minimum housing requirement that arises from the application of the Standard Method with the 2014 household projection is exceeded on the following basis:</p> <ul style="list-style-type: none"> <li>• There is a pressing need for affordable housing in the Wyre Forest District. Increasing the housing requirement increases the amount of affordable housing delivered as it will be predominantly provided by S.106 agreements associated with new residential development.</li> <li>• The emerging Local Plan proposes a lower level of affordable provision than in the adopted Core Strategy. This will have the advantage of increasing the viability of individual schemes assisting with their delivery.</li> <li>• Providing additional housing will assist in supporting the economic growth of Wyre Forest. The construction of</li> </ul>	Policy AM6a of the Plan should be reworded to confirm that the standard method should be applied using the 2014 household projections. There are, however, a number of circumstances that warrant increasing the number of houses proposed above the minimum figure that arises from the Standard Method as detailed above.	Yes	The overall housing requirement and its delivery is a fundamental part of the emerging plan. Barratt Homes control one of the largest housing sites within the District and will play a key role in the delivery of the housing requirements. We would like to attend the examination in order to discuss the overall housing requirement and the opportunities that arise from the Plan including a housing requirement that exceeds that that was from the application of the Standard Method.



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								<p>housing itself will result in new jobs being created. The residents of these properties will support existing service and facilities through increasing footfall.</p> <ul style="list-style-type: none"> <li>• This approach works towards the object of the Framework of boosting significantly its supply of housing.</li> <li>• This approach introduces flexibility into the Plan in case any of the identified housing sites do not deliver as expected. That way even if there is a shortfall, minimum overall delivery or more of the allocated housing sites not coming forward as expected, the minimum Standard Method housing requirement will be met.</li> </ul> <p>In summary, we support the ambition for the delivery of a minimum of 276 dpa but have concerns with the way in which the housing requirements have been justified.</p>			
Homes England  Sarah Taylor	<a href="#">ALPPS121</a>	AM6A	Support	Yes	Yes	Yes		Homes England welcomes the change to AM6A and AM6.8 that specify that the annual housing requirement is a minimum number of dwellings. This is a positive approach and sets out commitment to growth, through meeting and where appropriate exceeding the target for the number of new homes in the District.		Yes	Homes England would like to be invited to participate at Examination Hearing Sessions relating to the housing issues and issues relating to the strategic allocation at Lea Castle.
Campaign to Protect Rural England  Peter King	<a href="#">ALPPS187</a>	Policy AM6A	Object		No	No	Justified Effective Consistent with National Policy	<p><b>Policy AM6A</b></p> <p>This objection relates not only to the above policy and specifically to the housing number in the Amended Plan, but also to the new village and urban extension in the Plan as consulted on last year, and probably several other parts of the Plan.</p> <p>We accept that NPPF encourages LPAs to be ambitious in their Plans for housing, but the counterpart to that is that the infrastructure and employment required to support that housing development must also be both planned for and delivered.</p> <p>We also accept that the Plan is largely correct in identifying the district as coterminous with its Housing Market Area (HMA). Arguably, the parishes of Hartlebury and Mamble, just beyond the district boundary, and perhaps some further rural areas should be included, but we do not think much turns on that.</p> <p>In particular we support the view that the Wyre Forest HMA is distinct from the Birmingham and Black Country (B&amp;BC) HMA. This view was supported by studies, undertaken for Greater Birmingham and Solihull (GBS) LEP and then for a coalition of 14</p>	Through CIL, s.106 payments, or otherwise ensure that measures are taken to alleviate congestion on A456, or	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.

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								<p>local authorities within the B&amp;BC HMA. These concluded that Bromsgrove and South Staffordshire were within the B&amp;BC HMA, but Wyre Forest District was not. We suspect that WFDC's membership of GBS LEP has led to peer pressure from fellow LEP members to contribute to the housing land deficit supposed to exist in the B&amp;BC HMA. Giving way to such pressure would be inappropriate, because WFDC's area is not part of the B&amp;BC HMA. Policy requires it to meet the needs only of its HMA.</p> <p>The need is for a balance plan, which provides for a balance of employment and housing. It should not be relying on residents commuting into B&amp;BC for work. This already happens to some extent and largely depends on car- based travel on A456. The proposals for a car park at Blakedown Station are welcome, but merely scratch the surface of the problems on A456. This road is heavily congested at peak times:</p> <p>In the morning peak period, there are long eastbound queues to get through Hagley and at the Grange Island near Halesowen.</p> <p>In the evening peak period, there are long westbound queues again at the Grange Island and along Kidderminster Road and Worcester Road, Hagley.</p> <p>A456 in Hagley was formerly an Air Quality Management Area, but has been downgraded to an Air Quality Monitoring Area, because the pollution levels were consistently just below the level where Management was required, but only modestly below.</p> <p>Various efforts have been made to alleviate congestion by alterations within the highway boundary, but have achieved little. It is difficult to see how any minor road improvements would alleviate the situation; nor would a Park and Ride Car Park at Blakedown (or one at Kidderminster) do more than scratch the surface of the problem.</p> <p>Below is a selection of traffic volumes obtained by a freedom of information request to Worcestershire County Council in 2012:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>Road</th> <th>Name</th> <th>Vehicles per day</th> </tr> </thead> <tbody> <tr> <td>2007</td> <td>A456</td> <td>Kidderminster Road (near School)</td> <td>46286</td> </tr> <tr> <td>162,000 each way per week</td> <td>2007</td> <td>A456 Worcester Road,</td> <td></td> </tr> </tbody> </table>	Date	Road	Name	Vehicles per day	2007	A456	Kidderminster Road (near School)	46286	162,000 each way per week	2007	A456 Worcester Road,				
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								<p>West Hagley 58571 410,000 per week</p> <p>19-Sep-12 A456/A450 Cross Keys, West Hagley 49378 daytime 7am to 6pm</p> <p>May-12 A38 Lickey End 31970 average weekdays</p> <p>03-Feb-10 A491 Stourbridge Road 24689 entire day</p> <p>May-12 A491 East of Hagley island 23990 average weekdays</p> <p>May-12 A441 Hopwood 20405 average weekdays</p> <p>03-Mar-11 A435 Hollywood Bypass, Wythall 16523 entire day</p> <p>No doubt there are some more recent figures in a traffic assessment to go with the Plan, probably higher ones, but your Council has failed to publish that. We have seen a letter from Bromsgrove District Council in later August objecting to the cancellation of a meeting on this subject, from which we deduce that WFDC has taken a political decision to ignore the traffic implication of its Plan for A456. A 500-space car park (though welcome, as stated) might decrease the traffic volume by 1200 vehicle movements, assuming that some spaces are used slightly more than once per day and counting two journeys saved per car park use. However that is 2.05% of the 2007 traffic volume. We believe that the Institute of Traffic Engineers advises that an increase of 5% in traffic volume is <i>de minimis</i> and should be ignored. That should apply equally to the very modest decrease generated by the car park, which is accordingly also <i>de minimis</i>.</p> <p>The conclusion is that the Plan is fundamentally unsound, because it fails to do anything significant to address the pre-existing infrastructure problem on A456 through Hagley. It ought to do so. By failing to ensure that there will be employment for the residents of all the new houses planned, the Plan will inevitably aggravate the problem in Hagley. WFDC accordingly has two options:</p> <p>Through CIL, s.106 payments, or otherwise ensure that measures</p>			

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								<p>are taken to alleviate congestion on A456, or</p> <p>The Plan should be to build considerably fewer houses than is required by the standard methodology in NPPF and limit those houses strictly to those working within the district.</p> <p>The scale of housing in the second case should be determined by local need (excluding demand from commuters) and calculated using an employment based scenario. Such a scenario should be based on the additional employment that WFDC can reasonably expect to be delivered. It should not be the aspirational (but fundamentally undeliverable) hopes of the local Strategic Economic Plan (SEP). If every LEP managed to deliver all the aspirations of their respective SEPs, it would be necessary for the UK economy and population to grow at a rate far beyond national expectations. Such SEPs (unlike the Plan) are never subject to the kind of Examination required for the Plan. They are fundamentally unsound in their aspirations; any Plan seeking to deliver such unsound aspiration must itself be unsound and unjustified.</p> <p>Since housing numbers lie at the root of the Plan, the whole Plan is fundamentally unsound and should not proceed to adoption in its present form.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS220</a>	Policy AM6A	Comment			No	Effective	<p>This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'.</p> <p>The Council has prepared a range of technical evidence to inform the preparation of the new Local Plan.</p> <p>To determine the housing requirements for Wyre Forest, the local planning authority has commissioned consultants to identify the appropriate housing need taking into consideration relevant factors identified in the NPPF and Planning Practice Guidance.</p> <p>The Council's Housing Needs Study (HNS 2018) has regard to the Government's standard method for calculating housing need and identifies a minimum 276 dwellings per year utilising the most up-to-date sub-national household projections (2016 SNHP). It is noted that the HNS 2018 considers further scenario analysis to verify whether the figure provided by the Government's</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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								<p>standard method is appropriate to Wyre Forest.</p> <p>In our previous representation, concern was raised regarding the Government’s stated intention to revert to the 2014 Sub-National Household Projections (SNHP) from the 2016 SNHP when determining housing need. If the Wyre Forest District local housing need figure is calculated using the 2014 based SNHP and the latest affordability ratio, the resultant housing need figure is 4,960 dwellings (248 dwellings per annum). However, this lower figure would undermine the ability for economic aspirations to be met, reduce the ability for affordable housing needs to be met and would again not take account of vacant properties within the District.</p> <p>It is therefore encouraging to see that, at Policy AM6A and Paragraph AM6.5 of the Amendments to the Pre-Submission Publication Document, the Council continues to commit to utilising the 2016 SNHP, resulting in a (minimum) housing requirement of 5,520 homes (276 per annum). This is justified on grounds that the Council wishes to be ambitious with its housing requirement figure in order to support economic growth and affordable housing delivery. This approach is supported by Taylor Wimpey and facilitated by Planning Practice Guidance, which states at Paragraph: 010 Reference ID 2a-010-20190220:</p> <p><i>“The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates”.</i></p> <p>That said, it remains that the Amendments to the Pre-Submission Local Plan is seeking to allocate 29 hectares of employment land, based upon the findings of the Employment Land Review (2018). Our previous representations set out concern with the 29ha employment land requirement is that it does not appear to take into account what could be needed in the event of Wyre Forest seeing stronger economic growth linked to the aspirations of their relevant future Local Enterprise Partnership<sup>1</sup>. For example, the Worcestershire Local Enterprise Partnership’s Strategic</p>			

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								<p>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 would 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>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> <p>As of July 2018, the Government has undertaken a review of LEP areas, resulting in there being no overlap between geographic areas. At present, it is not known whether Wyre Forest will be part of either the Worcestershire LEP or the Greater Birmingham or Solihull LEP.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS234</a>	Policy AM6A	Comment			No	Effective	<p>This representation relates to land at Belbroughton Road, Blakedown, which is within the control of Taylor Wimpey. This land has not previously been promoted through the Local Plan Review process. A small section (approximately 1ha) of the site is included within the Rural East HELAA (August 2019) as Site Ref: WFR/CB/4 'Land Adjacent to 77 Belbroughton Road'.</p> <p>The Council has prepared a range of technical evidence to inform the preparation of the new Local Plan.</p> <p>To determine the housing requirements for Wyre Forest, the local planning authority has commissioned consultants to identify the appropriate housing need taking into consideration relevant factors identified in the NPPF and Planning Practice Guidance.</p> <p>The Council's Housing Needs Study (HNS 2018) has regard to the Government's standard method for calculating housing need and identifies a minimum 276 dwellings per year utilising the most up-to-date sub-national household projections (2016 SNHP). It is noted that the HNS 2018 considers further scenario analysis to verify whether the figure provided by the Government's standard method is appropriate to Wyre Forest.</p> <p>In previous representations made by Pegasus Group on behalf of Taylor Wimpey, concern was raised regarding the Government's stated intention to revert to the 2014 Sub-National Household Projections (SNHP) from the 2016 SNHP when determining</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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								<p>be given to increasing the quantum of employment land brought forward by the Local Plan.</p> <p>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>			
Taylor Wimpey West Midlands	<a href="#">ALPPS253</a>	Policy AM6A Development Needs 2016-2036	Comment					<p>This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 'Land off Ribbesford Road / Rectory Lane'. However, the land which is being promoted for development by Taylor Wimpey extends northwards beyond Site.</p> <p>The Council has prepared a range of technical evidence to inform the preparation of the new Local Plan. To determine the housing requirements for Wyre Forest, the local planning authority has commissioned consultants to identify the appropriate housing need taking into consideration relevant factors identified in the NPPF and Planning Practice Guidance.</p> <p>The Council's Housing Needs Study (HNS 2018) has regard to the Government's standard method for calculating housing need and identifies a minimum 276 dwellings per year utilising the most up-to-date sub-national household projections (2016 SNHP). It is noted that the HNS 2018 considers further scenario analysis to verify whether the figure provided by the Government's standard method is appropriate to Wyre Forest.</p> <p>In our previous representation, concern was raised regarding the Government's stated intention to revert to the 2014 Sub-National Household Projections (SNHP) from the 2016 SNHP when determining housing need. If the Wyre Forest District local housing need figure is calculated using the 2014 based SNHP and the latest affordability ratio, the resultant housing need figure is 4,960 dwellings (248 dwellings per annum). However, this lower figure would undermine the ability for economic aspirations to be met, reduce the ability for affordable housing needs to be met and would again not take account of vacant properties within the District.</p> <p>It is therefore encouraging to see that, at Policy AM6A and Paragraph AM6.5 of the Amendments to the Pre-Submission Publication Document, the Council continues to commit to</p>	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.	Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>



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Gaynor Gillespie	<a href="#">ALPPS215</a>	Policy AM6A Development Needs 2016-2036	Object		No		Justified Consistent with National Policy	<p>The land at Captain, Bromsgrove Road could make a significant contribution towards meeting the dwelling numbers of 276 pa in policy AM6A Development Needs.</p> <p>The site was included as a core housing site in the Local Plan</p>	Please see attachment.	Yes	To explain further the rationale behind the suggested changes and be given the opportunity to respond to any changes

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								<p>Review Preferred Options (June 2017), with the potential to enhance the landscape by developing land that currently has a minor negative impact within the Green Belt. The Council's PEA in June 2018 resulted in the Council removing this site from the Pre-Submission Publication Draft October 2018.</p> <p>New evidence provided by Swift Ecology and submitted with representations in December 2018 to the Pre-Submission Publication Draft October 2018 showed that the Council's position was not justified and that, in this regard, the draft plan was therefore not sound.</p> <p>The site has not been included in the Wyre Forest District Local Plan 2016-36</p> <p>Amendments to the Pre-Submission Publication Document July 2019 and the Sustainability Appraisal for this document do not fairly represent the value of this site for delivering housing.</p> <p>Further survey work carried out by Swift Ecology through 2019, as recommended by the Council's Ecologist, has again demonstrated that the developable area is not "severely limited" (Preferred Options conclusions October 2018), even with the application of the maximum ecological buffer of 50m.</p> <p>The reasons for not allocating the site as given in the Sites Selection Paper August 2019 are not justified by the evidence now available. The recommendation of a 50m buffer is provided as a "worst case scenario" and it is expected that this buffer will be reduced following further hydrological and ecological work.</p> <p>The Evolving Development Strategy included in the Sites Selection Paper August 2019 maintains a preference for brownfield sites in urban areas and recognises that Green Belt land adjacent to main settlements such as Kidderminster will need to make up the shortfall. It must be the case that this site WFR/ST/1, a largely brownfield site in the Green Belt and adjacent to Kidderminster, should come forwards for development in advance of any Green Belt site in the Green Belt.</p> <p>The HELAA August 2019 concludes that "<i>if ecological impacts can be mitigated for, site would be suitable for some development</i>". The Council acknowledges that the site is available, having been promoted through the call for sites and at all subsequent stages of the plan-making process. The Council</p>			the Council proposes to make and any further evidence that is presented.

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								<p>also considers that development is achievable subject to the site being taken out of the Green Belt.</p> <p>The expert evidence from Swift Ecology and the defining of a developable area on the submitted plan have demonstrated that ecological impacts can be mitigated for and so the site is available and suitable for development, and development is achievable.</p> <p>The site is deliverable. The site is owned by a single landowner and is promoted for development. The Council's evidence base confirms that the site is a suitable location for residential development, there are no constraints to development that cannot be mitigated and indeed that development could enhance this location. The site is controlled by a house builder with a proven track record of deliverability in the District. The site should be allocated for the development of circa 116 – 135 homes in the local plan.</p> <p>The available evidence does not justify the Council's decision to exclude this site and, in this regard, the draft plan is unsound.</p>			
Association of Black Country Authorities  Vicki Popplewell	<a href="#">ALPPS179</a>	Policy AM6A Development Needs	Comment					<p><b><u>Housing Representation</u></b></p> <p>The Black Country Authorities support the commitment that consideration will be given to a future early review of the WFDC Local Plan where it is established, as part of the Black Country Plan review process, that the Black Country cannot meet its own housing and employment land needs to 2038. However you will recall that we wrote to WFDC in July 2018 (via your Chief Executive) , when we advised that our work indicated there was likely to be a significant shortfall in the ability of the Black Country urban areas to accommodate projected housing growth and we asked for cooperation towards meeting the anticipated shortfall in capacity. Our preferred position would have been for the WFDC Local Plan to have acknowledged the potential housing shortfall from the emerging Black Country Plan evidence base (with further evidence to be published in November 2019) and attributed some of the WFDC additional housing allocation to meeting the Black Country's needs.</p> <p>As part of the process for agreeing the Statement of Common Ground with WFDC, would like to explore the pointy at which an early review of the WFDC plan will be triggered, in accordance with the emerging Draft Black Country Plan and the associated</p>			

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								evidence base.  The Leaders of the BC authorities have endorsed this response in principle through a meeting of the Association of Black Country Authorities on 25th September 2019.			
Euro Property Investments Ltd.	<a href="#">ALPPS36</a>	Table AM6.0.1 Wyre Forest Development Needs 2016-2036	Support	Yes	Yes	Yes		The amendments to the Pre-Submission draft Plan do not seek to change the overall development needs of the District. However, we welcome the introduction of the word 'minimum' into Table AM6.0.1 and consider that this accords with the policies of the Framework in seeking to boost the supply of housing.		Yes	
Euro Property Investments Ltd.	<a href="#">ALPPS37</a>	Paragraph AM6.5	Support	Yes	Yes	Yes		We welcome the Council's position and explanation as to why it has decided not to use the 2014-based household projections when calculating its housing requirement, as this generates a lower level of need than when the 2016-based projections are used. A more ambitious housing requirement to meet job and economic growth aspirations of the Council, along with the delivery of affordable housing is fully supported by EPIL.		Yes	
Bloor Homes (Western)	<a href="#">ALPPS75</a>	AM6.5	Support	Yes	Yes	Yes		The additional text in paragraph AM6.5 explains why the Council has not used the 2014-based household projections, and instead used the 2016-based projections, when calculating the housing requirement using the standard method. We support the Council's approach and welcome the fact that they are not pursuing the lower annual housing requirement that the 2014-based household projections would generate. The more ambitious housing requirement is considered appropriate in that it will help deliver economic growth and affordable housing delivery, both of which are key objectives that BHW support.		Yes	As a promoter of an alternative site for residential development in the District we would welcome the chance to discuss the merits of the site if there is any indication that alternative or additional sites are needed.
Marmaris Investments Ltd. Colin Griffiths	<a href="#">ALPPS9</a>	AM6.5	Object	No	No	Yes	Positively Prepared Justified Effective	The council does not explain sufficiently why the 2016 projections (Household Projections and Sub-National Population Projections) are relied upon to underpin the housing requirement of the plan. To merely recite passages from the PPG is not sufficient, and assessment of the considerations that lead to their use is required. This should be set out in the plan.	An assessment of the considerations of the use of the 2016 housing projections is required.	Yes	The nature of our representations and participation in round table sessions regarding housing strategy, Green Belt release and Blakedown.
Gladman Developments Ltd Nicole Burnett	<a href="#">ALPPS131</a>	AM6.5	Comment	No	No	No	Positively Prepared Justified Effective Consistent with National	Paragraph AM6.5 provides details regarding the Council's use of the 2016 household projections rather than the 2014 based ones. Gladman broadly support the justification provided, however would still query whether the approach being taken is ambitious enough and whether the Council should be planning for a higher level of growth than included within the Local Plan Proposed Submission. As the amendment itself notes the PPG is		Yes	Gladman's previous representations with regards the initial regulation 19 consultation still stand as do the site submissions made within these. Given the concerns

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							Policy	clear that the standard method is the minimum starting point in determining housing need and therefore will be instances where this is should be increased. As noted in Gladman's previous submissions the affordable housing need in Wyre Forest is a significant proportion of the total housing need (57%) consequently, Gladman consider it would be prudent to increase the overall housing requirement further to help ensure the delivery of much needed affordable housing across Wyre Forest.			raised through these combined submissions Gladman would wish to participate at the relevant hearing sessions in due course.
Homes England  Sarah Taylor	<a href="#">ALPPS119</a>	AM6.10	Comment	Yes	Yes	Yes		Homes England notes that at AM6.10 the entire Lea Castle Village is treated as a strategic allocation (as this was the position at April 2019). In June 2019 permission was granted for 600 new homes at the former hospital part of Lea Castle Village. These 600 homes could therefore be included in the 'commitments not yet started' row.	Homes England notes that at AM6.10 the entire Lea Castle Village is treated as a strategic allocation (as this was the position at April 2019). In June 2019 permission was granted for 600 new homes at the former hospital part of Lea Castle Village. These 600 homes could therefore be included in the 'commitments not yet started' row.	Yes	Homes England would like to be invited to participate at Examination Hearing Sessions relating to the housing issues and issues relating to the strategic allocation at Lea Castle.
Taylor Wimpey West Midlands	<a href="#">ALPPS227</a>	Paragraph AM6.10 - 5 Year Housing Land Supply	Comment					This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'.  <b>Five Year Housing Land Supply Report (April 2019)</b>  Wyre Forest District Council has produced an updated Five-Year Housing Land Supply Report, which identifies that the District Council is able to demonstrate a 7.18-year housing land supply.  The Report grounds this calculation on the 2014-based		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.  Taylor Wimpey also considers it necessary to participate due to the significance of the

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								household projections, despite the emerging plan deliberately using the 2016-based projections. Given that this Report has been prepared in support of the Local Plan Review, it is strongly contented that the calculation and the plan should match.  Medium size sites such as Bewdley Road North play an important role in supporting housing land supply in the short-term, in that they are deliverable within five years.			Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	<a href="#">ALPPS240</a>	AM6.10 5 Year Housing Land Supply	Comment					This representation relates to land at Belbroughton Road, Blakedown, which is within the control of Taylor Wimpey. This land has not previously been promoted through the Local Plan Review process. A small section (approximately 1ha) of the site is included within the Rural East HELAA (August 2019) as Site Ref: WFR/CB/4 'Land Adjacent to 77 Belbroughton Road'.  Wyre Forest District Council has produced an updated Five-Year Housing Land Supply Report, which identifies that the District Council is able to demonstrate a 7.18-year housing land supply.  The Report grounds this calculation on the 2014-based household projections, despite the emerging plan deliberately using the 2016-based projections. Given that this Report has been prepared in support of the Local Plan Review, it is strongly contented that the calculation and the plan should match.  Medium size sites such as Land at Belbroughton Road plan an important role in supporting housing land supply in the short-term, in that they are deliverable within five years.		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.  Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	<a href="#">ALPPS282</a>	Development Strategy	Comment					<b>Development Strategy</b>  <i>Buffer</i>  3.36 The Pre-Submission Publication Local Plan identifies a total land supply within Table 6.0.2 to accommodate 6,365 dwellings. It is noted that the amendments to the table make it clear this relates to net new supply rather than a gross figure and this is supported. Nevertheless, the land supply will provide a buffer to assist in ensuring a housing requirement of 5,520 homes will be provided within the plan period. Whilst the principle of a buffer is supported, advice of the Local Plan Expert Group suggested incorporating a buffer of 20%, which would result in the need to identify additional land equivalent to accommodating in the order of 1,104 additional dwellings. Therefore, in total, the Local Plan should be providing enough land equivalent to the delivery		Yes	

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012)

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								<p>of a total of 6,624 dwellings over the plan period to 2036 in Wyre Forest District.</p> <p>3.37 To address this element of unsoundness within the Local Plan, additional allocations should be identified to deliver a minimum of a further 259 dwellings.</p> <p><i>Urban Extensions vs. Dispersal</i></p> <p>3.38 Whilst it is good planning practice to reap the benefits of large scale development on the urban edge to comprehensively plan a neighbourhood and secure the delivery of required infrastructure, it is important that housing delivery is maintained throughout the plan period to enable households to form as and when they need to. The best way this can be achieved is through identifying additional sites elsewhere in the District. Further, different housing needs and preferences exist across the District and, therefore, to provide choice and variety to households, in a sustainable manner, is beneficial. This is particularly so when new housing is often a more popular choice for first time buyers given the support provided through the successful 'Help to Buy' initiative. Alternatively, households may choose to relocate elsewhere outside of Wyre Forest, which would be potentially detrimental to the local economy and to support the creation of 1,100 net new jobs to 2036.</p> <p>3.39 Whilst housing should be located in the most sustainable locations from the perspective of minimising the need to travel, there are a number of social benefits to locating homes in more rural locations (i.e. sustaining local services, allowing families to live nearby relatives and, inevitably, achieving a balanced population to help a location to thrive). Development can bring with it much needed facilities and infrastructure to communities, which could improve the quality of life for residents. It is therefore important that a reasonable level of development is dispersed to deliver sustainable communities across Wyre Forest. This should, however, not undermine the vision for a comprehensive urban extension to the east of Kidderminster and the strategic benefits this could deliver.</p> <p>3.40 The Pre-submission Publication document appears to represent a combination of both Option 'A' and Option 'B' sites identified through within the Preferred Options Local Plan consultation document. This balanced strategy is supported in principle by Taylor Wimpey and would assist in providing</p>			

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								<p>deliverable and sustainable growth in Wyre Forest.</p> <p><i>Housing Trajectory</i></p> <p>3.41 It is noted that a housing trajectory is set out at page 271 of the Pre-Submission Publication Local Plan (Picture 37.1) and updated to 1st April 2019 within the Amendments consultation document. This identifies a range of assumed annual completions from a low point in 2017/18 (141 net completions) to a peak of over 600 completions in 2022/23. However, detailed site-specific information is not provided and therefore it is impossible to provide any scrutiny to determine whether the Council's assumptions are robust. It is extremely important that a site specific Housing Trajectory is prepared so that the development rates of each site are fully transparent and can be publicly scrutinised.</p> <p>3.42 A robust trajectory is important to demonstrate that the strategic policies of the Local Plan provide a clear strategy for bringing sufficient land forward and at a sufficient rate to address housing needs over the plan period by planning for and allocating sufficient sites to deliver strategic priorities (NPPF para 23). The policies of the Local Plan should identify a supply of specific deliverable sites for years 1 – 5 of the plan period and specific developable sites or broad locations for growth for years 6 – 10 and where possible years 11 – 15 (NPPF para 67). The identification of deliverable and developable sites should accord with the definitions set out in the NPPF Glossary.</p>			
Gladman Developments Ltd Nicole Burnett	<a href="#">ALPPS133</a>	AM6.11	Comment	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Gladman note the amendments through AM6.11 with regards to the preparation of Statements of Common Ground (SoCG) being prepared where necessary for the examination of the Local Plan. Gladman are supportive of the production of SoCGs however would urge the Council to ensure that these are prepared and published in advance of the EiP hearing sessions allowing interested parties opportunity to review this in order to avoid any unnecessary delay in the process. In this regard paragraph 020 of the PPG makes clear that authorities should have a SoCG available on their website by the time they publish the draft plan, in order to provide communities and other stakeholders with a transparent picture of how they have collaborated. As stated above, it is apparent that this key piece of evidence was not available during the initial regulation 19 or consultation or indeed this additional amended version of the pre-submission consultation.		Yes	Gladman's previous representations with regards the initial regulation 19 consultation still stand as do the site submissions made within these. Given the concerns raised through these combined submissions Gladman would wish to participate at the relevant hearing sessions in due course.



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Birmingham City Council  Ian Macleod	<a href="#">ALPPS166</a>	AM6.11 Duty to Co-operate	Comment					The strategic housing issues outlined above will be the main area of focus for any Statement of Common Ground (SoCG) with Wyre Forest. As previously discussed, we would support a joint SoCG with the Black Country, having similar strategic housing issues with Wyre Forest and forming part of the same Housing Market Area.		No	
Persimmon Homes Limited	<a href="#">ALPPS146</a>	Policy AM6B Locating New Development	Object		No		Positively Prepared Justified Effective	RPS welcomes the proposed amendment to Policy 6B, which now clarifies that the Plan will provide for the delivery of sufficient housing to meet <i>'as a minimum'</i> the objectively assessed needs up to 2036. In addition, RPS welcomes the insertion of text in the accompanying table to Policy 6B that reflects the role of Bewdley based on the <i>'range of local services'</i> available to local people, and also the additional text that acknowledges that suitable development is needed to ensure the <i>'long term vitality and viability'</i> of the town is secured.  However, RPS consider that Policy 6B should recognise that an up to date locational strategy for Wyre Forest, including market towns in the settlement hierarchy such as Bewdley, requires the release of land from the Green Belt to meet local housing needs in order for the Plan to be soundly-based (given the Council accepts the principle that exceptional circumstances does exist, which RPS agrees with). RPS suggests that additional wording should be inserted into Policy 6B (criterion A.v) to reflect this.	For clarity, Policy 6B (A.v) should also be amended to reflect the protection of the Green Belt <i>having regard to sites proposed for release as part of the Local Plan.</i> Furthermore, RPS suggests that additional wording should be inserted into Policy 6B (criterion A.v) to reflect the comments above regarding the need for Green Belt release to support the locational strategy in the Plan.	Yes	In order to properly represent the interests of the client.
Horton Estates Ltd	<a href="#">ALPPS137</a>	AM6B Locating New Development	Object	Yes	No	Yes	Justified	Hortons' Estate Ltd ("Hortons") supports Principle iii. which encourages the effective reuse of previously- developed land (PDL). Significant areas of PDL exist beyond the main towns, including industrial estates such as Hortons' 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 paras. 84, 117, 138 and 145 of the Framework).  Notwithstanding the above, Hortons considers that Principle iii. should be expanded to cross-reference the Local Plan's identification of specific PDL sites in the Green Belt under Policy	It is requested that the following text be added to the end of Principle iii:  <i>"This includes the partial/complete redevelopment or infilling of previously-developed sites in</i>	Yes	Hortons' Estate Ltd is the owner of Cursley Distribution Park which is proposed for allocation in the Local Plan under Policy 35. This is a substantial previously-developed site in the Green Belt and Hortons therefore wishes to participate in the Examination Hearings.

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								35 where infilling or partial/complete redevelopment will be permitted.	<i>the Green Belt to ensure the effective use of land"</i>		
Euro Property Investments Ltd.	<a href="#">ALPPS38</a>	Policy 6MB Locating New Development	Support	Yes	Yes	Yes		Whilst the text to the policy is largely unchanged between this version of the Plan and the Pre-Submission Draft, we wish to reiterate our support for the identification of Bewdley as a Market Town and its role to deliver new housing to ensure the long term vitality and viability of the town.		Yes	
Bloor Homes (Western)	<a href="#">ALPPS72</a>	AM6B	Support	Yes	Yes	Yes		BHW support the settlement hierarchy set out in Table AM6.0.3. Specifically, we welcome Kidderminster being identified as the Main Town which will be the focus for large scale housing provision including the Kidderminster Eastern Extension. The inclusion of the Kidderminster Eastern Extension as a location for growth confirms that the Council consider this to be a suitable location for significant new development to meet the future needs of the District.		Yes	As a promoter of an alternative site for residential development in the District we would welcome the chance to discuss the merits of the site if there is any indication that alternative or additional sites are needed.
Barratt Homes West Midlands	<a href="#">ALPPS154</a>	Policy AM6B Locating New Development	Support	Yes	Yes	Yes		We support the recognition that Stourport-on-Severn is sustainable and a suitable location for additional residential development. It provides a comprehensive range of services, facilities and employment opportunities. It is an appropriate location for large-scale housing provision.		No	
Gladman Developments Ltd Nicole Burnett	<a href="#">ALPPS134</a>	AM6B	Comment	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Policy 6B provides the proposed approach to the location of new development. Following on from amendments to Policy 6A this policy again refers to " <i>meeting as a minimum the objectively assessed needs to 2036</i> ". As outlined above Gladman are supportive of the level of housing delivery being expressed as a minimum.		Yes	Gladman's previous representations with regards the initial regulation 19 consultation still stand as do the site submissions made within these. Given the concerns raised through these combined submissions Gladman would wish to participate at the relevant hearing sessions in due course.
Taylor Wimpey West Midlands	<a href="#">ALPPS222</a>	Policy AM6B	Comment					This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of

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								<p>Road North’.</p> <p>As per Policy 6B, Taylor Wimpey considers the principles upon which the Development Strategy is based to be sound. The principles align to the delivery of the overarching Vision and the Plan’s Aim and Objectives, ensuring the delivery of homes, jobs and focusing development to the most accessible locations whilst having regard to the provision of infrastructure.</p> <p>Stourport-on-Severn is identified as a ‘Large Market Town’ within the District. As the second order settlement within the District, its role in supporting the provision of larger scale housing and employment development is supported.</p> <p>Taylor Wimpey also supports the amendment that has been made in respect of Bewdley through Policy AM6B; that being that Bewdley benefits from ‘a range’ of services and employment opportunities, rather than ‘fewer’, as previously drafted.</p>			<p>amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Taylor Wimpey West Midlands	<a href="#">ALPPS235</a>	AM6B	Comment					<p>As per Policy 6B, Taylor Wimpey considers the principles upon which the Development Strategy is based to be sound. The principles align to the delivery of the overarching Vision and the Plan’s Aim and Objectives, ensuring the delivery of homes, jobs and focusing development to the most accessible locations whilst having regard to the provision of infrastructure.</p> <p>Blakedown is identified as one of 10 fifth-tier settlements, ‘<i>Other Villages and Rural Settlements</i>’. Development identified as being suitable at Blakedown includes ‘<i>housing to meet local needs</i>’.</p> <p>The Amendments to the Pre-Submission Publication Document is clear throughout that Blakedown represents a sustainable location for development. This includes the recognition that Blakedown benefits from the only other railway station in the District, beyond that of Kidderminster. Blakedown Station has 2 trains per hour in the off peak in Kidderminster/Birmingham services. In the peak it is served by up to 3 trains per hour in Worcester-Birmingham services, with calls in 2 Kidderminster-London Marylebone services in the morning peak.</p> <p>This acknowledgement has resulted in the allocation of Land off Station Drive, Blakedown (Site Ref: WFR/CB/3) for approximately 50 dwellings, in conjunction with the provision of additional parking to serve Blakedown Station. The Local Plan also identifies a wider Blakedown rail enhancement scheme, which forms part</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>

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								<p>of Worcestershire’s Local Transport Plan (LTP) 2018 – 2030. This includes:</p> <p>Improvements to passenger information and station facilities for passengers;</p> <ul style="list-style-type: none"> <li>• Facilities that will cater for current and future demand growth;</li> <li>• Improvements to walking /cycling routes to the station;</li> <li>• Improvements to access arrangements for cyclists and provide additional new cycle storage facilities;</li> <li>• Set-down and pick-up facilities for taxi users and operators;</li> <li>• Improve facilities for passengers with disabilities or who experience difficulty using the railway station facilities;</li> <li>• Working with Train Operating Companies to improve services</li> </ul> <p>The allocation of approximately 50 new homes and the delivery of the additional facilities at Blakedown Station identified above are clearly serving a greater-than- local need.</p> <p>It is therefore considered that Blakedown should be elevated to at least the fourth-tier ‘Villages Covered (Washed Over) By Green Belt’ on sustainability grounds. Nevertheless, it remains that these fourth-tier settlements are only identified as meeting local housing needs. It could therefore be argued that Blakedown warrants the creation of a new tier, sitting beneath the third-tier market town of Bewdley. This new tier would recognise the substantial sustainability credentials of Blakedown and it is contented that Blakedown should accordingly serve a greater role in meeting housing needs within Wyre Forest District.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS257</a>	Policy AM6B Locating New Development	Support					<p>Taylor Wimpey supports Kidderminster’s role as the strategic centre of the District. As the existing ‘centre’ for commercial, employment, retail, office and leisure facilities it is the most sustainable location for meeting future housing needs.</p> <p>Taylor Wimpey considers the principles upon which the Development Strategy is based to be sound. The principles align to the delivery of the overarching Vision and the Plan’s Aim and Objectives, ensuring the delivery of homes, jobs and focusing development to the most accessible locations whilst having</p>		Yes	Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.

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								<p>regard to the provision of infrastructure.</p> <p>Stourport-on-Severn is identified as a Large Market Town within the District. As the second order settlement within the District, its role in supporting the provision of larger scale housing and employment development is supported.</p>			Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	<a href="#">ALPPS274</a>	Policy AM6B	Support					<p><b>Policy AM6B Locating New Development</b></p> <p>3.23 Policy AM6B establishes the Development Strategy, including a number of guiding principles and a settlement hierarchy to inform the spatial distribution of growth.</p> <p>3.24 Taylor Wimpey considers the principles, upon which the Development Strategy is based, to be sound. The principles align to the delivery of the overarching Vision and the Plan's Aim and Objectives, ensuring the delivery of homes, jobs and focusing development to the most accessible locations whilst having regard to the provision of infrastructure.</p> <p>3.25 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>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Gaynor Gillespie	<a href="#">ALPPS213</a>	Policy 6MB Locating New Development	Object		No		Justified Consistent with National Policy	<p>The development of site Captains, Bromsgrove Road would meet all of the relevant principles in proposed policy AM6B Locating New Development against which the development strategy and the site allocations in the plan are considered.</p> <p>The site was included as a core housing site in the Local Plan Review Preferred Options (June 2017), with the potential to enhance the landscape by developing land that currently has a minor negative impact within the Green Belt. The Council's PEA in June 2018 resulted in the Council removing this site from the Pre-Submission Publication Draft October 2018.</p> <p>New evidence provided by Swift Ecology and submitted with representations in December 2018 to the Pre-Submission Publication Draft October 2018 showed that the Council's position was not justified and that, in this regard, the draft plan</p>	To include site Captains, Bromsgrove Road in the Pre Submission Plan.	Yes	To explain further the rationale behind the suggested changes and be given the opportunity to respond to any changes the Council proposes to make and any further evidence that is presented.

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								<p>was therefore not sound.</p> <p>The site has not been included in the Wyre Forest District Local Plan 2016-36</p> <p>Amendments to the Pre-Submission Publication Document July 2019 and the Sustainability Appraisal for this document does not fairly represent the value of this site for delivering housing.</p> <p>Further survey work carried out by Swift Ecology through 2019, as recommended by the Council's Ecologist, has again demonstrated that the developable area is not "severely limited" (Preferred Options conclusions October 2018), even with the application of the maximum ecological buffer of 50m.</p> <p>The reasons for not allocating the site as given in the Sites Selection Paper August 2019 are not justified by the evidence now available. The recommendation of a 50m buffer is provided as a "worst case scenario" and it is expected that this buffer will be reduced following further hydrological and ecological work.</p> <p>The Evolving Development Strategy included in the Sites Selection Paper August 2019 maintains a preference for brownfield sites in urban areas and recognises that Green Belt land adjacent to main settlements such as Kidderminster will need to make up the shortfall. It must be the case that this site WFR/ST/1, a largely brownfield site in the Green Belt and adjacent to Kidderminster, should come forwards for development in advance of any greenfield site in the Green Belt.</p> <p>The HELAA August 2019 concludes that <i>"if ecological impacts can be mitigated for, site would be suitable for some development"</i>. The Council acknowledges that the site is available, having been promoted through the call for sites and at all subsequent stages of the plan-making process. The Council also considers that development is achievable subject to the site being taken out of the Green Belt.</p> <p>The expert evidence from Swift Ecology and the defining of a developable area on the submitted plan have demonstrated that ecological impacts can be mitigated for and so the site is available and suitable for development, and development is</p>			

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Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								<p>achievable.</p> <p>The site is deliverable. The site is owned by a single landowner and is promoted for development. The Council's evidence base confirms that the site is a suitable location for residential development, there are no constraints to development that cannot be mitigated and indeed that development could enhance this location. The site is controlled by a house builder with a proven track record of deliverability in the District. The site should be allocated for the development of circa 116 – 135 homes in the local plan.</p> <p>The available evidence does not justify the Council's decision to exclude this site and, in this regard, the draft plan is unsound.</p>			
Owl Homes	<a href="#">ALPPS190</a>	PolicyAM6B	Support	Yes	Yes	Yes		<p>Owl Homes is working with the landowners of land off Habberley Road, Bewdley to support proposals for residential development. The site is a proposed allocation in the emerging Local Plan to which these representations relate. Owl Homes supports the Council in proactively seeking growth in its area and in preparing a new Local Plan to enable this.</p> <p>Owl Homes supports the assessment of Bewdley in Policy AM6B as a Market Town. The alterations proposed are considered to be appropriate in particular in recognizing the range of facilities available in Bewdley and allowing residential development that will ensure the long term vitality and viability of Bewdley. This Policy has been positively prepared, is justified and effective and consistent with National Policy which sets out a presumption in favour of sustainable development (NPPF Para 11) and in recognizing that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites (NPPF Para 85f).</p>		Yes	To support the Policy approach.
Sport England Stuart Morgans	<a href="#">ALPPS167</a>	Policy AM6B Locating New Development	Support					<p>Sport England made representations on the 2018 pre-submission draft commenting that in order to ensure consistency with the rest of the plan, particularly Policy 6E which includes protection/provision of outdoor sports facilities, para 97 of the NPPF and the Council's evidence in the adopted Playing Pitch Strategy and Built Sports Facilities Strategy, that Sport and Recreation uses should be added to the types of suitable development in Stourport-on Severn, to reflect the settlement includes several sports facilities.</p> <p>AM6B Table AM6.0.3 makes this modification and so Sport England's objection has now been addressed. Sport England does</p>		No	

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								not wish to object to this proposed modification.			
Bloor Homes (Western)	<a href="#">ALPPS73</a>	AM6C	Support	Yes	Yes	Yes		BHW support the continued role that Kidderminster is intended to serve as the strategic centre of the District in terms of it providing a focus for new housing, commercial and employment development. Furthermore, the confirmation that two sustainable strategic sites are proposed, including the Kidderminster Eastern Extension, is also supported.		Yes	As a promoter of an alternative site for residential development in the District we would welcome the chance to discuss the merits of the site if there is any indication that alternative or additional sites are needed.
Taylor Wimpey West Midlands	<a href="#">ALPPS223</a>	Policy AM6C	Support					<p>This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'.</p> <p>Again, as per Policy 6C, Taylor Wimpey supports Kidderminster's role as the strategic centre of the District. As the existing 'centre' for commercial, employment, retail, office and leisure facilities it is the most sustainable location for meeting future housing needs.</p> <p>The reference to sustainable strategic allocations for Kidderminster is 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.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Taylor Wimpey West Midlands	<a href="#">ALPPS236</a>	AM6C	Support					<p>This representation relates to land at Belbroughton Road, Blakedown, which is within the control of Taylor Wimpey. This land has not previously been promoted through the Local Plan Review process. A small section (approximately 1ha) of the site is included within the Rural East HELAA (August 2019) as Site Ref: WFR/CB/4 'Land Adjacent to 77 Belbroughton Road'.</p> <p>Again, as per Policy 6C, Taylor Wimpey supports Kidderminster's role as the strategic centre of the District. As the existing 'centre' for commercial, employment, retail, office and leisure facilities it is the most sustainable location for meeting future housing needs.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the</p>



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								The reference to sustainable strategic allocations for Kidderminster are welcomed and considered necessary to ensure the sustainable growth of the town and to support future commercial and leisure development to support Kidderminster's role as a strategic centre, promoting the town as a tourism 'hub' and assisting in the creation of a diverse evening/night time economy.			Kidderminster Eastern Extension in the overall spatial strategy contained therein.
Taylor Wimpey West Midlands	<a href="#">ALPPS256</a>	Policy AM6C Kidderminster Town as the Strategic Centre	Support					<p>This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 'Land off Ribbesford Road / Rectory Lane'. However, the land which is being promoted for development by Taylor Wimpey extends northwards beyond Site.</p> <p>Again, as per Policy 6C, Taylor Wimpey supports Kidderminster's role as the strategic centre of the District. As the existing 'centre' for commercial, employment, retail, office and leisure facilities it is the most sustainable location for meeting future housing needs.</p> <p>The reference to sustainable strategic allocations for Kidderminster is 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.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Taylor Wimpey West Midlands	<a href="#">ALPPS273</a>	AM6C	Support			Yes		<p><b>Policy AM6C Kidderminster town as the strategic centre of the District</b></p> <p>3.26 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.</p> <p>3.27 The reference to sustainable strategic allocations for Kidderminster is 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.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained</p>

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											therein.
Gaynor Gillespie	<a href="#">ALPPS212</a>	Policy AM6C Kidderminster Town as the strategic centre of the District	Object		No		Justified Consistent with National Policy	<p>Re-development of site Captains, Bromsgrove Road, meets Policy AM6C Kidderminster Town as the strategic centre of the District, which identifies Kidderminster continuing as the strategic centre for the District and enhancement of its role in providing a focus for new housing and other forms of development.</p> <p>The available evidence shown above and in the attached documents do not justify the Council's decision to exclude this site and, in this regard, the draft plan is unsound.</p> <p>The site was included as a core housing site in the Local Plan Review Preferred Options (June 2017), with the potential to enhance the landscape by developing land that currently has a minor negative impact within the Green Belt. The Council's PEA in June 2018 resulted in the Council removing this site from the Pre-Submission Publication Draft October 2018.</p> <p>New evidence provided by Swift Ecology and submitted with representations in December 2018 to the Pre-Submission Publication Draft October 2018 showed that the Council's position was not justified and that, in this regard, the draft plan was therefore not sound.</p> <p>The site has not been included in the Wyre Forest District Local Plan 2016-36.</p> <p>Amendments to the Pre-Submission Publication Document July 2019 and the Sustainability Appraisal for this document does not fairly represent the value of this site for delivering housing. Further survey work carried out by Swift Ecology through 2019, as recommended by the Council's Ecologist, has again demonstrated that the developable area is not "severely limited" (Preferred Options conclusions October 2018), even with the application of the maximum ecological buffer of 50m.</p> <p>The reasons for not allocating the site as given in the Sites Selection Paper August 2019 are not justified by the evidence now available. The recommendation of a 50m buffer is provided as a "worst case scenario" and it is expected that this buffer will be reduced following further hydrological and ecological work.</p> <p>The Evolving Development Strategy included in the Sites Selection Paper August 2019 maintains a preference for</p>	To include site Captains, Bromsgrove Road in the Pre Submission Plan.	Yes	To explain further the rationale behind the suggested changes and be given the opportunity to respond to any changes the Council proposes to make and any further evidence that is presented.

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								<p>brownfield sites in urban areas and recognises that greenfield land adjacent to main settlements such as Kidderminster will need to make up the shortfall. It must be the case that this site WFR/ST/1, a largely brownfield site in the Green Belt and adjacent to Kidderminster, should come forwards for development in advance of any greenfield site in the Green Belt.</p> <p>The HELAA August 2019 concludes that <i>“if ecological impacts can be mitigated for, site would be suitable for some development”</i>. The Council acknowledges that the site is available, having been promoted through the call for sites and at all subsequent stages of the plan-making process. The Council also considers that development is achievable subject to the site being taken out of the Green Belt.</p> <p>The expert evidence from Swift Ecology and the defining of a developable area on the submitted plan have demonstrated that ecological impacts can be mitigated for and so the site is available and suitable for development, and development is achievable.</p> <p>The site is deliverable. The site is owned by a single landowner and is promoted for development. The Council’s evidence base confirms that the site is a suitable location for residential development, there are no constraints to development that cannot be mitigated and indeed that development could enhance this location. The site is controlled by a house builder with a proven track record of deliverability in the District. The site should be allocated for the development of circa 116 – 135 homes in the local plan.</p> <p>The available evidence does not justify the Council’s decision to exclude this site and, in this regard, the draft plan is unsound.</p>			
Bloor Homes (Western)	<a href="#">ALPPS74</a>	AM6D	Support	Yes	Yes	Yes		<p>BHW support the proposed strategic allocation referred to as the Kidderminster Eastern Extension. BHW also welcome that the land covered by the strategic allocation is also being removed from the Green Belt. The policy refers to Policy 32 of the Pre-Submission Draft Local Plan and the extent of the allocation being defined on the Proposals Map. Whilst no changes are proposed to the allocation between Pre-Submission and Proposed Amendments to the Pre-Submission Draft of the Local Plan, BHW would like to register their land at Hurcott Lane, Kidderminster as an omission from the wider strategic allocation. Whilst we do not consider that the omission of the Hurcott Lane</p>		Yes	As a promoter of an alternative site for residential development in the District we would welcome the chance to discuss the merits of the site if there is any indication that alternative or additional sites are needed.

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								site from the strategic allocation itself goes to the soundness of the Plan, it is submitted in case the Council need to identify alternative or additional housing and employment sites as a result of the discussion during the Examination. Clearly, our view on soundness would change if problems arise regarding the deliverability of other proposed allocations during the Plan Period.			
Taylor Wimpey West Midlands	<a href="#">ALPPS224</a>	Policy AM6D	Comment					<p>This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'.</p> <p>Taylor Wimpey has no further comment to make beyond that which was submitted in respect of Policy 6D. Taylor Wimpey remain committed to the delivery of the proposed 'East of Kidderminster' Urban Extension and welcome continuing proactive discussions with the District Council in bringing forward these land interests within the Plan period.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Taylor Wimpey West Midlands	<a href="#">ALPPS237</a>	Policy AM6D	Comment					<p>This representation relates to land at Belbroughton Road, Blakedown, which is within the control of Taylor Wimpey. This land has not previously been promoted through the Local Plan Review process. A small section (approximately 1ha) of the site is included within the Rural East HELAA (August 2019) as Site Ref: WFR/CB/4 'Land Adjacent to 77 Belbroughton Road'.</p> <p>Taylor Wimpey has no further comment to make beyond that which has previously been submitted in respect of Policy 6D. Taylor Wimpey remain committed to the delivery of the proposed 'East of Kidderminster' Urban Extension and welcome continuing proactive discussions with the District Council in bringing forward these land interests within the Plan period.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Taylor Wimpey West Midlands	<a href="#">ALPPS255</a>	Policy AM6D Strategic	Comment					This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern		Yes	

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Midlands		Allocation Sites						<p>extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 'Land off Ribbesford Road / Rectory Lane'. However, the land which is being promoted for development by Taylor Wimpey extends northwards beyond Site.</p> <p>Taylor Wimpey has no further comment to make beyond that which was submitted in respect of Policy 6D. Taylor Wimpey remain committed to the delivery of the proposed 'East of Kidderminster' Urban Extension and welcome continuing proactive discussions with the District Council in bringing forward these land interests within the Plan period.</p>			<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Taylor Wimpey West Midlands	<a href="#">ALPPS275</a>	Policy AM6D	Comment					<p><b>Policy AM6D Strategic Allocation Sites</b></p> <p>The identification of strategic allocations at Kidderminster is wholly supported by Taylor Wimpey in recognition of the insufficient amount of sustainably located, readily available land within the town, to support the necessary level of development growth to meet identified housing and employment needs.</p> <p>Taylor Wimpey has significant land interests within the proposed 'East of Kidderminster' Urban Extension and would welcome ongoing proactive discussions with the District Council in bringing forward these land interests within the Plan period. However, it should be noted that Taylor Wimpey has further land interests to the south of Comberton Road that do not form part of the strategic allocation, that would provide future growth opportunities within Kidderminster beyond the plan period.</p> <p>Further planning consideration of the East of Kidderminster Urban Extension is set out in chapter 4 to these representations.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Gaynor Gillespie	<a href="#">ALPPS214</a>	Policy AM6D Strategic Allocation Sites	Object		No		Justified Consistent with National Policy	<p>Two strategic allocations are proposed in Policy AM6D Strategic Allocation Sites, one of which is the Kidderminster Eastern Extension. Land at Captains, Bromsgrove Road, should be included within the Kidderminster Eastern Extension allocation as a site that is standalone, available, and capable of delivering new</p>	To include site Captains, Bromsgrove Road in the Pre Submission Plan.	Yes	To explain further the rationale behind the suggested changes and be given the opportunity to respond to any changes the Council proposes to

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

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								<p>homes immediately.</p> <p>The site was included as a core housing site in the Local Plan Review Preferred Options (June 2017), with the potential to enhance the landscape by developing land that currently has a minor negative impact within the Green Belt. The Council's PEA in June 2018 resulted in the Council removing this site from the Pre-Submission Publication Draft October 2018.</p> <p>New evidence provided by Swift Ecology and submitted with representations in December 2018 to the Pre-Submission Publication Draft October 2018 showed that the Council's position was not justified and that, in this regard, the draft plan was therefore not sound.</p> <p>The site has not been included in the Wyre Forest District Local Plan 2016-36</p> <p>Amendments to the Pre-Submission Publication Document July 2019 and the Sustainability Appraisal for this document does not fairly represent the value of this site for delivering housing.</p> <p>Further survey work carried out by Swift Ecology through 2019, as recommended by the Council's Ecologist, has again demonstrated that the developable area is not "severely limited" (Preferred Options conclusions October 2018), even with the application of the maximum ecological buffer of 50m.</p> <p>The reasons for not allocating the site as given in the Sites Selection Paper August 2019 are not justified by the evidence now available. The recommendation of a 50m buffer is provided as a "worst case scenario" and it is expected that this buffer will be reduced following further hydrological and ecological work.</p> <p>The Evolving Development Strategy included in the Sites Selection Paper August 2019 maintains a preference for brownfield sites in urban areas and recognises that greenfield land adjacent to main settlements such as Kidderminster will need to make up the shortfall. It must be the case that this site WFR/ST/1, a largely brownfield site in the Green Belt and adjacent to Kidderminster, should come forwards for development in advance of any greenfield site in the Green Belt.</p>			make and any further evidence that is presented.

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

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								<p>The HELAA August 2019 concludes that “if ecological impacts can be mitigated for, site would be suitable for some development”.</p> <p>The Council acknowledges that the site is available, having been promoted through the call for sites and at all subsequent stages of the plan-making process. The Council also considers that development is achievable subject to the site being taken out of the Green Belt.</p> <p>The expert evidence from Swift Ecology and the defining of a developable area on the submitted plan have demonstrated that ecological impacts can be mitigated for and so the site is available and suitable for development, and development is achievable.</p> <p>The site is deliverable. The site is owned by a single landowner and is promoted for development. The Council’s evidence base confirms that the site is a suitable location for residential development, there are no constraints to development that cannot be mitigated and indeed that development could enhance this location. The site is controlled by a house builder with a proven track record of deliverability in the District. The site should be allocated for the development of circa 116 – 135 homes in the local plan.</p> <p>The available evidence does not justify the Council’s decision to exclude this site and, in this regard, the draft plan is unsound.</p>			
Euro Property Investments Ltd.	<a href="#">ALPPS39</a>	Policy AM6E Role of Stourport-on-Severn and Bewdley as Market Towns	Support	Yes	Yes	Yes		In light of EPIL’s land interests in Bewdley and specifically the draft allocation of the triangle site on Stourport Road we do not object to the additional text that has been added that limits new development in Bewdley to the site allocations. Clearly, if there were to be any change to the status of the Stourport Road, Bewdley site as a draft allocation we would revise our position accordingly. As such, as long as it remains as an allocation we do not object to this additional wording.		Yes	
Persimmon Homes Limited	<a href="#">ALPPS142</a>	Policy AM6E Role of Stourport-on-Severn and Bewdley as market towns	Object		No		Positively Prepared Justified Effective	RPS submitted representations to the Pre-Submission consultation in December 2018, which sought amendments to address concerns regarding the restrictive role for Bewdley proposed under Policy 6E, despite the clear sustainability advantages of locating growth at the town due to its relatively closer proximity to Kidderminster. In the context of the representations submitted to this consultation on amendments to the Pre-Submission (Reg 19) Plan, RPS argue that there is even greater need to incorporate further amendments that recognise the role Bewdley can play in meeting the future (increased) need	For clarity, RPS suggest that the policy be modified taking into account the modification previously submitted on the Pre-Submission	Yes	In order to properly represent the interests of the client.

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								<p>for development in Wyre Forest. Consequently, this representation should be read in conjunction with separate representations submitted by RPS on Policy 6A (as amended).</p> <p>RPS considers that the Plan can, and should, properly recognise the important contribution that Bewdley can make to addressing the (increased) development needs of the District. This is based on a number of observations, outlined below.</p> <p>It is welcomed that the Plan continues to recognise Bewdley as an important settlement in its own right under Policy 6E, separate to any other settlements in the District. This is reflective of the historic role of the town; However, RPS considers that this ignores the opportunities to promote the status of Bewdley in planning terms, based on available evidence. Firstly, Bewdley has seen less growth delivered in the town compared to the settlements and locations in the hierarchy. This is evident based on annual monitoring figures published by the Council for housing delivery by settlement since 2006 (latest data available up to 2016). These figures indicate that Bewdley saw a net increase of 164 dwellings over that ten-year period (or 16 dwellings per year), of which 45 dwellings were delivered in 2006/7. This was significantly less than the delivery seen in Stourport-on-Severn, which saw 593 additional dwellings (59 dpy), and also less than the 241 dwellings (24 dpy) built in the wider rural area over the same period. Consequently, the delivery seen at Bewdley since 2006 has not reflected its acknowledged strategic role in the District, largely as a result of the Green Belt boundary to the east of the town. Therefore, RPS suggests that this provides a clear justification for directing growth towards Bewdley through the emerging Plan, particularly in light of the increased housing need likely in Wyre Forest indicated under separate representations to the Plan (to Policy 6A). Without these, the plan does not plan sufficiently positive in terms of the strategy for Bewdley.</p> <p>In terms of the appropriate location for growth at Bewdley, it is acknowledged that the Plan identifies a number of site allocations at the town, including site released from the Green Belt (as stated in bullet point six to Policy 6E). RPS considers this entirely reasonable and appropriate, despite other non-Green Belt alternatives being promoted through the emerging Plan. In this regard, it is noted that the Sustainability Appraisal (SA) has considered a range of options on 'broad areas for development' in the District (section 5.3 refers) and supports the growth at</p>	<p>Plan in Dec 2018. In addition, the policy needs to recognise and reflect on the evident past under-supply of housing at Bewdley in the context of the exceptional circumstances that current exists which, on the basis that local housing needs are likely to be higher than suggested in the Plan (see RPS response to Policy 6A), demonstrate sufficient justification exists for release of Green Belt sites and, in appropriate circumstances, this can and should be done in preference to non-Green Belt sites located in more sensitive parts of the town.</p> <p>See additional representations on Green Belt Review (Policy</p>		



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								<p>Bewdley as meeting the sustainability objectives of the Plan (under option 5). Of significance, the SA also recognises that certain areas adjacent to the town (i.e. but outside the adopted Green Belt) may not be appropriate locations due to, for example, their high landscape value (i.e. to the north and north-west of the town). Therefore, in the context of the exceptional circumstances that exist in terms of requiring the release of Green Belt in order to meet the future needs of the District, this indicates that there is justification for releasing Green Belt land in preference to non-Green Belt sites in more sensitive locations. Consequently, the Plan should make clear that release of Green Belt is appropriate and that circumstances exist where this is justified in preference to non-Green Belt sites.</p> <p>RPS provides additional representations with respect to the Green Belt, including the Green Belt Review, under separate submissions to Policy 7A.</p>	7A) submitted separately.		
Barratt Homes West Midlands	<a href="#">ALPPS155</a>	Policy AM6E, Role of Stourport and Bewdley as Market Towns	Support	Yes	Yes	Yes		<p>Support the identified role of Stourport-on-Severn in delivering the requirements of the Plan. Specifically, we support the reference to Stourport-on-Severn making an important contribution towards meeting the District's requirement for new homes with the focus being on existing brownfield sites within the urban area and sustainable, suitable greenfield sites such as Pearl Lane (APR/14).</p> <p>Barratt Homes are in the process of preparing a full planning application for Pearl Lane bringing it forward for development. It is a sustainable, suitable and deliverable allocation which could provide a much-needed market and affordable housing in a timely fashion.</p>		No	
Gladman Developments Ltd Nicole Burnett	<a href="#">ALPPS135</a>	AM6E	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>Policy 6E relates to the role of Stourport-on-Severn and Bewdley as Market Towns. Gladman note the proposed change to the first bullet point within the Bewdley section of this policy, which seeks to limit development in Bewdley to the site allocations in the Local Plan. Gladman consider this approach to be overly restrictive and remind the council of the need for a degree of flexibility and contingency in case the planned developments do not come forward as envisaged and in order to rapidly respond to changes in circumstances through the course of the plan period.</p> <p>Bewdley is a sustainable settlement with a wide range of key services and facilities including a Co-Op, Tesco, Post Office, Doctors Surgery, Petrol Station, two primary schools and a</p>		Yes	Gladman's previous representations with regards the initial regulation 19 consultation still stand as do the site submissions made within these. Given the concerns raised through these combined submissions Gladman would wish to participate at the relevant hearing sessions in due course.

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RESPONSES TO CHAPTER AM6: A SUSTAINABLE FUTURE: DEVELOPMENT STRATEGY**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant ?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination ?	Reason for Attending
								<p>secondary school. Gladman reiterate the view that Bewdley can play a larger role in housing delivery than that which is currently being planned for and additional allocations and flexibility for further growth should be included in the plan.</p> <p>Gladman note that the second bullet point in relation to Bewdley relates to the settlement as a sustainable tourist destination with reference to its sustainable transport links. Whilst Gladman do not dispute these points we would highlight that these sustainable transport links are not just linked to the tourism destinations they are part of a wider service which allows existing local residents and future residents to access employment and services in Stourport and Kidderminster.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS225</a>	Policy AM6E	Object	No	No		Justified	<p>This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'.</p> <p>As per our previous representation, the identified role of Stourport on Severn and Bewdley as part of the development strategy for the District is broadly supported, recognising that Stourport-on-Severn has a more strategic role than Bewdley within the settlement hierarchy.</p> <p>However, Policy AM6E introduces a requirement that: <i>"Development within the towns' Conservation Areas must preserve or enhance those areas, the heritage assets contained therein and their settings"</i>. Whilst the intention of this text is understood, it is unduly restrictive and not commensurate with the provisions of Chapter 16 of the NPPF, specially, paragraphs 189 – 202.</p> <p>Taylor Wimpey is promoting Land at Bewdley Road North, Stourport-on-Severn for development (Site Ref: LI/5). Further details in respect of this site are provided in Chapter 4 of this Representation.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Taylor Wimpey West Midlands	<a href="#">ALPPS269</a>	Policy AM6E Role of Stourport-on-Severn and Bewdley as Market Towns	Object		No		Justified Consistent with National Policy	<p>This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 'Land off Ribbesford Road / Rectory Lane'. However, the land which is being promoted for development by Taylor Wimpey extends</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of</p>

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

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								<p>northwards beyond Site.</p> <p>As per our previous representation, the identified role of Stourport on Severn and Bewdley as part of the development strategy for the District is broadly supported, recognising that Stourport-on-Severn has a more strategic role than Bewdley within the settlement hierarchy.</p> <p>Policy AM6E introduces a requirement that: <i>“Development within the towns’ Conservation Areas must preserve or enhance those areas, the heritage assets contained therein and their settings”</i>. Whilst the intention of this text is understood, it is unduly restrictive and not commensurate with the provisions of Chapter 16 of the NPPF, specially, paragraphs 189 – 202.</p> <p>Taylor Wimpey promoting is Land at Rectory Lane, Areley Kings, for development. Further details in respect of this site are provided in Chapter 4 of this Representation in the attached document.</p>			<p>amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Owl Homes	<a href="#">ALPPS191</a>	PolicyAM6E	Comment	Yes	Yes	Yes		<p>Owl Homes is working with the landowners of land off Habberley Road, Bewdley to support proposals for residential development. The site is a proposed allocation in the emerging Local Plan to which these representations relate. Owl Homes supports the Council in proactively seeking growth in its area and in preparing a new Local Plan to enable this.</p> <p>Policy AM6E seeks to limit development in Bewdley to sites which have been allocated in the Local Plan. This limitation however does not reflect the earlier assessment of Bewdley in Policy AM6B and the aim to promote the vitality and viability of the Market Town.</p> <p>Given the sustainability of Bewdley, limiting its growth is not entirely consistent with national policy which supports sustainable patterns of development (NPPF Para 138).</p>	<p>It is recommended that the wording of AM6E – Bewdley is altered to the following:</p> <p>Bewdley's contribution towards the District's housing need will be limited to the development of the allocated sites for Bewdley and development which ensures the long-term vitality and viability of Bewdley. This reflects the town's</p>	Yes	To ensure the Policy is consistent with National Policy.

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									conservation context and the range of local services within the town. Some limited greenfield development will be permitted to enable this.		
Taylor Wimpey West Midlands	<a href="#">ALPPS276</a>	Policy AM6E	Comment					<p><b>Policy AM6E Role of Stourport on Severn and Bewdley as Market Towns</b></p> <p>The identified role of Stourport on Severn and Bewdley as part of the development strategy for the District is broadly supported, recognising that Stourport-on-Severn has a more strategic role than Bewdley within the settlement hierarchy.</p> <p>Stourport-on-Severn is identified as a 'Large Market Town' within Policy AM6B, containing a comprehensive range of local services, amenities, public transport and employment serving the town and its rural hinterland. As a sustainable settlement, it is right that Stourport-on-Severn makes an important contribution to meeting the District's requirements for new homes within the Plan period.</p> <p>Taylor Wimpey is promoting further land within Stourport-on-Severn and these are considered further through separate representations.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Taylor Wimpey West Midlands	<a href="#">ALPPS221</a>	Policy AM6F	Comment					<p>This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'.</p> <p>Taylor Wimpey is encouraged that comments previously made in respect of Policy 6F and how this was applicable to Lea Castle Village have been taken on board by the Council, with Lea Castle Village now being subject to a stand-alone Policy. Taylor Wimpey has no further comments to make in this regard.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained</p>

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											therein.
Taylor Wimpey West Midlands	<a href="#">ALPPS238</a>	Policy AM6F	Comment					<p>This representation relates to land at Belbroughton Road, Blakedown, which is within the control of Taylor Wimpey. This land has not previously been promoted through the Local Plan Review process. A small section (approximately 1ha) of the site is included within the Rural East HELAA (August 2019) as Site Ref: WFR/CB/4 'Land Adjacent to 77 Belbroughton Road'.</p> <p>Taylor Wimpey is encouraged that comments previously made in respect of Policy 6F and how this was applicable to Lea Castle Village have been taken on board by the Council, with Lea Castle Village now being subject to a stand-alone Policy. Taylor Wimpey has no further comments to make in this regard.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Taylor Wimpey West Midlands	<a href="#">ALPPS268</a>	Policy AM6F Role of the existing villages and rural areas	Comment	Yes	Yes	Yes		<p>This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 'Land off Ribbesford Road / Rectory Lane'. However, the land which is being promoted for development by Taylor Wimpey extends northwards beyond Site.</p> <p>Taylor Wimpey is encouraged that comments previously made in respect of Policy 6F and how this was applicable to Lea Castle Village have been taken on board by the Council, with Lea Castle Village now being subject to a stand-alone Policy. Taylor Wimpey has no further comments to make in this regard.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Owl Homes	<a href="#">ALPPS192</a>	PolicyAM6E	Comment	Yes	Yes	Yes		<p>Owl Homes is working with the landowners of land off Habberley Road, Bewdley to support proposals for residential development. The site is a proposed allocation in the emerging Local Plan to which these representations relate. Owl Homes supports the</p>		Yes	<p>To ensure that the Policy is consistent with National Policy.</p>

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								<p>Council in proactively seeking growth in its area and in preparing a new Local Plan to enable this.</p> <p>Owl Homes generally supports Policy AM6F in that it demonstrates a positive approach to development in existing villages that are sustainable. However it is noted that development is restricted to that where there is 'local need'. If the settlements are considered to be sustainable then development should not be restricted to local need but to that which is appropriate for the size and sustainability of the settlement.</p> <p>National policy encourages sustainable development and therefore this policy is not entirely consistent with national policy in that it could restrict sustainable development.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS277</a>	Policy AM6F	Comment					<p><b>Policy AM6F Role of the Villages in the Rural Areas</b></p> <p>3.34 Taylor Wimpey broadly supports Policy AM6F which seeks to limit new residential development in the rural villages to meeting local housing needs only. This is reflective of the settlement hierarchy set out within Policy AM6B, recognising that Kidderminster, Stourport-on-Severn and, to a lesser extent Bewdley, are the most sustainable locations for meeting identified development needs.</p> <p>3.35 It is noted that the proposed modification to this policy is clear that Policy Am6F is not applicable to the proposed Lea Castle Village.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Homes England Sarah Taylor	<a href="#">ALPPS120</a>	AM6.51	Support	Yes	Yes	Yes		Homes England welcomes the added clarity at AM6.51 that Policy 6F on existing villages and rural areas does not apply to Lea Castle Village.		Yes	Homes England would like to be invited to participate at Examination Hearing Sessions relating to the housing issues and issues relating to the strategic allocation at Lea Castle.
John Wood	<a href="#">ALPPS89</a>	AM6.29	Object	No	No	No	Positively Prepared Justified Consistent	Not legally compliant - AMEC Foster Wheeler carried out the Green Belt Review in 2016 and 2017. They have also advised Homes England on Lea Castle since 2016. This is a conflict of	I believe that, as the Wyre Forest Green Belt Review cannot be		As a Parish Councillor and a member of the Cookley and Caunsall Neighbourhood Plan

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							t with National Policy	<p>interest.</p> <p>Not consistent with National Policy - Policy 7.7 &amp; NPPF (paragraph 136) Green Belt boundaries should be only altered where exceptional circumstances are fully evidenced and justified. WFDC have not done shown justification. Even the Wyre Forest Five Year Housing Land Supply Calculation 2019 lists a requirement of 1302 dwellings by 2024, from a point where there is national housing shortage. The calculation of housing need which the 2018 Local Plan Document was based on is part of a now discredited Office for National Statistics calculation which grossly over estimated need and has now been down-graded.</p> <p>Not consistent with National Policy - Policy 31 - WFDC have treated all the villages and hamlets within the Parish differently. Wolverley has been termed washed-over Green Belt and development with only small sites being considered within the Local Plan – even brownfield sites are not listed. Caunsall is washed-over Green Belt but two sites in the Green Belt have been listed for potential development. Cookley is regarded is surrounded by Green Belt but an extremely large development will be allowed in present Green Belt. There are no such distinctions for Green Belt in National Policy.</p> <p>The brownfield sites being the old Quarry Site WFR/WC/40 and Wolverley Camp WFR/WC/20 were totally ignored. Together with the Zion Hill School Site and the Lea Castle Hospital agreed plan of 600 houses; there would be enough housing to get a primary school, without touching Green Belt. In the Local Plan Review Preferred Options Consultation (June 2017) and Summary of Consultation – Appendix 1 – Call for sites; the ‘Land South of Cookley’ WFR/WC/13 is described as ‘Very sensitive to development due to open views to the South, impact to the setting of mature woodland character and high risk of coalescence between Kidderminster and Cookley. But as the Green Belt surrounding the Lea Castle Hospital has been ‘promoted by Homes England’ HELAA-2018 the ‘very sensitive’ assessment has been ignored. It is also worth noting that there were two District Councillors (one Chair of Planning and one Leader of the Council) who were resident of Wolverley at the time of the approval of sites put into the Local Plan.</p> <p>I strongly object to the Green Belt Removal WFR/WC/15/32/33/34, as this will allow unfettered development</p>	<p>considered independent because of AMEC’s conflict of interest. I believe that the Green Belt Review needs to be done again with an independent consultant or at the very least by subject to independent review.</p> <p>Green Belt boundaries should be only altered where exceptional circumstances are fully evidenced and justified. WFDC have not shown exceptional circumstances and need to demonstrate this with independent overview to ensure compliance to NPPF (paragraph 136).</p> <p>National Green Belt policy must be adhered to, it is not acceptable for Wyre Forest Council to play</p>		steering committee, I consider that I have a lot of knowledge of the proposed sites for development and as the proposed developments in my parish are the largest in the local plan, I think I can submit information and evidence to the inspector. Therefore benefiting the process.

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								<p>within this area. The Lea Castle Hospital Site development, which has already passed planning, is sufficient to meet Wyre Forest housing need and is way in excess of that identified in the Wolverley and Cookley Parish Housing Needs Survey. There is no justification for development in the Green Belt of the other sites: WFR/WC/15/32/33/34; and the addition of more Green Belt land than that included in the October 2018 review is reprehensible. The land along Axborough Lane also cut out from the Green Belt was described in the Homes England Lea Castle Village Concept Plan as Ancient Woodland – where is the justification for removing that from the Green Belt?</p> <p>Not Positively Prepared – In Wyre Forest HELLA 2018, 4 sites were considered in Cookley, 2 in Caunsall and 4 in Wolverley including 2 brownfield sites: the old Quarry Site WFR/WC/40 and Wolverley Camp WFR/WC/20. 4 sites from Cookley were adopted, 2 from Caunsall and one small site from Wolverley. The two brownfield sites from Wolverley were not adopted, despite World War II buildings and roads occupying the one site and obvious signs of quarrying activity on the other. The sites of all three villages were within the Green Belt. But due to the different treatment of these villages Wolverley termed washed-over Green Belt; Caunsall washed-over Green Belt and Cookley is surrounded by Green Belt; large scale development is focussed on Cookley – despite all sites being within the Green Belt.</p> <p>Duty to Co-operate – The 4 drop-in meetings were in areas less affected by the housing development. There was no drop in at Cookley, Wolverley or Broadwaters: the 3 parishes most affected, due to the excessive scale of the proposed Lea Castle Village Development. I believe that by denying these parishes a drop-in session failed in their duty to co-operate. Many people without access to a car, mobility issues and at the mercy of our poor bus provision were denied the opportunity to access information about the amendments to the plan as well as the plan itself.</p>	<p>fast and loose with designations of Green Belt. All the North Worcestershire villages should have the same Green Belt criteria applied to them: Cookley, Caunsall and Wolverley.</p> <p>The consultation for the Local Plan should be restarted with all homes in Wyre Forest having equal access drop-in consultation meetings. It is not acceptable to select areas less affected, in preference to the 3 parishes most affected by the local plan.</p>		



**APPENDIX D: AMENDMENTS TO THE PRE-SUBMISSION PUBLICATION DOCUMENT (JULY 2019) - CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER AM8G:SITE PROVISION FOR TRAVELLING SHOWPEOPLE**

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Taylor Wimpey West Midlands	<a href="#">ALPPS267</a>	Policy AM1.20 Sustainability Appraisal	Comment	Yes	Yes	Yes		<p>This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 'Land off Ribbesford Road / Rectory Lane'. However, the land which is being promoted for development by Taylor Wimpey extends northwards beyond Site.</p> <p>Taylor Wimpey has no comments to make in respect of Policy AM8G.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Adrian Voysey	<a href="#">ALPPS3</a>	AM8G	Object	Yes	No	Yes	Justified Effective	There is no demand or justification to create a site for travelling show people. It would also have a detrimental impact on security and house prices in the local area, especially those on the Burlish Estate.		No	
Sport England Stuart Morgans	<a href="#">ALPPS175</a>	Policy 8AMG, Site provision for Travelling Show people	Object		No		Positively Prepared Consistent with National Policy	<p>Sport England did not make representations in respect of Policy 8G (site for provision for Travelling showpeople) of the 2018 Pre-submission draft as the proposed allocation of the site to the rear of Zortech Avenue did not affect any existing sports facility.</p> <p>Proposed modification Policy AM8G now proposes to allocate the former Burlish Golf Course Clubhouse site (LI/12) for development for Travelling showpeople. In the 2018 pre-submission draft, the clubhouse site was proposed for employment use, for which Sport England raised objection to policy 10A, table 10.0.1 and site allocation LI12.</p> <p>In essence, the proposed modifications switch these two proposed allocations.</p> <p>The basis for Sport England's objection to the employment allocation of site LI/12 was that the loss of the golf course and its associated club</p>	Amend Policy AM8G and AM30.29 relating to allocation LI12 to include provision within the plan for appropriate mitigation in an equivalent or better provision of sports facilities in a suitable location to accord with paragraph 97 of the NPPF, and in accordance with the evidence in the Council's Playing Pitch Strategy and Built Sports Facilities Strategy.	No	

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								<p>house had not been justified in accordance with paragraphs 96 and 97 of the NPPF. Sport England commented that neither the Council's Playing Pitch Strategy (PPS) nor its Built Sports Facilities Strategy assesses the need for golf courses, and that no evidence had been prepared to demonstrate that the golf course facility is surplus to requirements to address paragraph 97a of the NPPF.</p> <p>Sport England put forward the case that the PPS identifies shortfalls of provision to meet quantitative needs for football (including 3G artificial grass pitches) and rugby union, both now and in the future to take into account population growth where existing shortfalls of provision are maintained and exacerbated.</p> <p>Sport England set out that the site adjoins existing playing fields and that the site provides potential for additional playing field provision to make a positive contribution to addressing identified needs set out in the PPS (in the event that the golf course was demonstrated to be surplus to requirements).</p> <p>The Council have since undertaken an assessment of golf provision in the District. The document has been subject to consultation with England Golf.</p> <p>The assessment makes the case that the existing level of golf provision across the District at various Golf Clubs is sufficient to meet demand, in the context of falling membership numbers in recent years. The report explains that the course closed in 2017, and that after a period of marketing no suitable assignee could be found to take on the running of the course, that the clubhouse has suffered from arson attacks and is in a poor condition. The assessment states that the course is now overgrown and would require an unsustainable large amount of investment.</p> <p>In consultation with England Golf, Sport England</p>			

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								<p>has made representations on the Golf Assessment, the main point being that whilst it is generally accepted that there is no longer a need to provide a traditional 18 hole golf course, that further consideration should be given to an alternative golf offer as opposed to retaining a traditional golf course. Eg. Adventure golf, pitch and putt, footgolf etc.</p> <p>Whilst the assessment has given some consideration to alternative golf play, this focuses on listing other facilities outside of Wyre Forest and does not explain why these are relevant to serving Wyre Forest residents. The assessment does not consider the potential of the former Burlish Golf Course site to provide an alternative golf offer on the site, or part of the site, which could be complementary to the Council's proposals to develop a cycle trail.</p> <p>A further point to make is that the former Burlish course provided the only entry level municipal facility in the District, with all other courses essentially providing golf club membership which will tend to be more attractive to established participants. Whilst the report sets out that there are flexible membership packages available at some other courses, this stops short of considering the cost of green fees, which may deter some more casual participants.</p> <p>So, whilst Sport England does not wish to object the loss of the Golf Course clubhouse, it wishes to raise concern that the assessment does not fully consider the potential alternative golf provision that could be provided.</p> <p>Whilst Sport England notes that the Council have been in discussion with British Cycling to create a new cycling facility, with potential s106 match funding, the need for this facility is not demonstrated in the Council's evidence base in the Playing Pitch Strategy/Built Sports Facilities Strategy. Whilst Sport England has no objection to the proposals to develop a new facility for</p>			

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								<p>cycling, the loss of the clubhouse to provide a site for travelling showpeople cannot be justified under para 97c of the NPPF since this is not a replacement sports facility.</p> <p>Sport England's view is that in order to accord with para 97 of the NPPF, that mitigation for the loss of the clubhouse should be secured within policy AM8G, in the form of a financial contribution towards investment priorities identified in the PPS/BFS. The contribution should be equitable to the loss.</p>			
Adrian Voysey	<a href="#">ALPPS4</a>	AM8.41	Object	Yes	No	Yes	Justified	If a need cannot be justified, the basis for providing a site. A housing site is not a suitable use for the Green Belt. I am concerned that a lot of such developments will culminate in the merging of Kidderminster and Stourport.		No	

**APPENDIX D: AMENDMENTS TO THE PRE-SUBMISSION PUBLICATION DOCUMENT (JULY 2019) - CONSULTATION SEPTEMBER/OCTOBER 2019**  
**RESPONSES TO CHAPTER AM10: A GOOD PLACE TO DO BUSINESS**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Gillian Hill	<a href="#">ALPPS189</a>	Amendments to Chapter 10	Object	No	No	No	Justified	Lea Castle - Although mention of employment in the plan exactly what would this be?		No	
Homes England Sarah Taylor	<a href="#">ALPPS122</a>	AM10.7	Comment	Yes	Yes	Yes		With regard to AM10.7, Homes England notes that Land off Park Gate Lane has been added for 0.34ha of employment land (WFR/WC/15) and that the previous Lea Castle allocation of 7 ha of employment land has changed to specify that it is 'Stourbridge Road' Lea Castle (WFR/WC/32). Homes England requests that in order to provide greater flexibility for the type and size of employment sites that may be required in future, these two allocations be merged, and that the 7.34ha be allocated to the Lea Castle village to provide the flexibility for the most appropriate employment locations to be determined once more detailed master planning has been undertaken and as the demand for different types and sizes of employment units emerges over time. Homes England is committed to providing employment land at Lea Castle Village, but greater flexibility as to the exact location of this should be provided to ensure good place making. The case for greater flexibility is supported by the Lea Castle Village Employment Land Market Assessment commissioned by North Worcestershire Economic & Development Regeneration in May 2019. At paragraph 5.14 this report states that flexibility should be the key watchword for this site in terms of the mix/type of B class employment uses. This paragraph also recommends that the employment at Park Gate Road that forms part of the planning permission for the former hospital part of the site is incorporated within one single employment block and marketed as such. This supports a single employment allocation at Lea Castle Village. This also has the advantage of freeing up the employment part of the application area for more appropriate uses.	With regard to AM10.7, Homes England notes that Land off Park Gate Lane has been added for 0.34ha of employment land (WFR/WC/15) and that the previous Lea Castle allocation of 7 ha of employment land has changed to specify that it is 'Stourbridge Road' Lea Castle (WFR/WC/32). Homes England requests that in order to provide greater flexibility for the type and size of employment sites that may be required in future, these two allocations be merged, and that the 7.34ha be allocated to the Lea Castle village to provide the flexibility for the most appropriate employment locations to be determined once more detailed master planning has been undertaken and as the demand for different types and sizes of employment units emerges over time. Homes England is committed to providing employment land at Lea Castle Village, but greater flexibility as to the exact location of this should be provided to ensure good place making. The case for greater flexibility is supported by the Lea Castle Village Employment Land Market Assessment commissioned by North Worcestershire Economic & Development Regeneration in May 2019. At paragraph 5.14 this report states that flexibility should be the key watchword for this site in terms of the mix/type of B class employment uses. This paragraph also recommends that the employment at Park Gate Road that forms part of the planning permission for the former hospital part of the site is incorporated within one single employment block and marketed as such. This supports a single		Homes England would like to be invited to participate at Examination Hearing Sessions relating to the housing issues and issues relating to the strategic allocation at Lea Castle.

**APPENDIX D: AMENDMENTS TO THE PRE-SUBMISSION PUBLICATION DOCUMENT (JULY 2019) - CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER AM10: A GOOD PLACE TO DO BUSINESS**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
									employment allocation at Lea Castle Village. This also has the advantage of freeing up the employment part of the application area for more appropriate uses.		
Sport England  Stuart Morgans	<a href="#">ALPPS177</a>	AM10.77 Employment Allocation Sites	Comment					Sport England previously objected to Policy 10A, and associated table 10.0.1 in respect of proposed employment allocation LI/12 (Former Clubhouse at Burlish Golf Course). It is noted that AM 10.7 (and the associated table AM10.0.1) have been amended to delete this proposed employment allocation, which have been replaced by LI/10 and LI13. Sport England has no objection to this amendment as the replacement employment sites do not involve the loss of an existing sports facility. However, please note that objections have been raised to the proposed modification to allocate the former golf clubhouse for travelling showpeople (see representations on Policy AM8G).		No	
Marmaris Investments Ltd.  Colin Griffiths	<a href="#">ALPPS10</a>	AM10.7, Table AM10.0.1	Object	No		Yes	Positively Prepared Justified Effective	The amount of land allocated for employment purposes within the Plan has increased from 32.48 ha to 35.21 ha. This increased provision will have an upward impact on housing need (employment driven demand) within the District. We note at present there is no corresponding increase in the amount of housing required in the District. This should be explained in the plan.  See the attached setting out our full representations to the plan.	To explain since the pre submission plan there has been an increase in employment allocations but not housing allocations.	Yes	The nature of our representations require appearance and participation in round table sessions regarding housing strategy, Green Belt release and Blakedown.
Horton Estates Ltd	<a href="#">ALPPS138</a>	AM10.7	Object	Yes	No	Yes	Justified	Hortons' Estate Ltd ("Hortons") supports the allocation of Cursley Distribution Park (Site ref. WFR/ST/9) for employment purposes through Table 10.0.1. This is a substantial previously-developed site which provides c.22,500 sq m of industrial floorspace and with opportunities for infilling and/or redevelopment – some of the buildings are reaching the end of their economic lives and Hortons is considering options to redevelop and modernise the site to ensure it	Hortons requests that the size of Site Ref. WFR/ST/9 (Cursley Distribution Park) be amended to 10ha in Table 10.0.1 to reflect the true size of the site as identified on the various maps supporting the Local Plan.	Yes	Hortons' Estate Ltd is the owner of Cursley Distribution Park which is proposed for allocation in the Local Plan under Policy 35. This is a substantial

**APPENDIX D: AMENDMENTS TO THE PRE-SUBMISSION PUBLICATION DOCUMENT (JULY 2019) - CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER AM10: A GOOD PLACE TO DO BUSINESS**

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								<p>offers attractive facilities for the market.</p> <p>Notwithstanding the above, it is unclear why Table 10.0.1 states that the site size for Cursley Distribution Park is only 0.7ha when it actually amounts to c.10ha.</p> <p>The Housing and Employment Land Availability Assessment (HELAA) (2019) states that the site is 9.98ha in size (page 30 and Site Proforma within the "Eastern Village Sites" Appendix), and the Policies (Appendix B Map A) and Overview Maps (Appendix B Map B) identify the whole site as an employment allocation. There appears to be no justification for the 0.7ha site area and it is therefore requested that the site size be amended to 10ha.</p>			previously-developed site in the Green Belt and Hortons therefore wishes to participate in the Examination Hearings.

**APPENDIX D: AMENDMENTS TO THE PRE-SUBMISSION PUBLICATION DOCUMENT (JULY 2019) - CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER AM13: TRANSPORT AND ACCESSIBILITY**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Richard Brine	<a href="#">ALPPS20</a>	Policy 13	Comment	Yes	Yes	Yes		Although I accept that statements in B, D and E are laudable, I am not sure whether there will be a massive take up to justify the cost of provision. Big issues are costs of parking and security at rail stations. Also for public transport services to work, they need to be reasonable, frequent, timely, reliable and clean.		No	
Clive Benjamin Prince	<a href="#">ALPPS207</a>	Policy AM13	Comment	Yes	No	Yes	Effective	<p>Wyre Forest Cycle Forum offers its whole hearted support to the reasoned justifications presented through Chapter 13 - Transport and Accessibility: they describe many of the active concerns we have discussed at our regular meetings.</p> <p>We hope and expect councillors to understand, endorse and support the implications of its realistic implementation. We describe evidence in our comments that the necessary "Soundness" has not been adequately applied.</p> <p>Whilst Wyre Forest Cycle Forum whole heartedly endorse the policy and congratulate the officers for producing such an excellent document, we are concerned that our comments on the evidence of some of what is presently being implemented could be construed as negative, whilst the reality is we would want to assure a positive outcome for sustainability an a future transport infrastructure.</p>	<p>Wyre Forest Cycle Forum offers its whole hearted support to the reasoned justifications presented through Chapter 13 - Transport and Accessibility: they describe many of the active concerns we have discussed at our regular meetings.</p> <p>We hope and expect councillors to understand, endorse and support the implications of its realistic implementation. We describe evidence in our comments that the necessary "Soundness" has not been adequately applied.</p>	Yes	Whilst Wyre Forest Cycle Forum whole heartedly endorse the policy and congratulate the officers for producing such an excellent document, we are concerned that our comments on the evidence of some of what is presently being implemented could be construed as negative, whilst the reality is we would want to assure a positive outcome for sustainability an a future transport infrastructure.
Dixon & Janice Sheppard	<a href="#">ALPPS103</a>	Policy AM13	Comment	Yes	Yes	Yes		I understand that the County Council have withdrawn from preserving the path of the Stourport Relief Road. This was formed for Stourport 40 years ago. The County Council have no problem in building new roads in the South of the County, but when it comes to the North and in particular Stourport, they are totally ignored. The County expect Stourport		No	



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RESPONSES TO CHAPTER AM13: TRANSPORT AND ACCESSIBILITY**

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								and Wyre Forest to plan for new homes, without any road improvements. This will lead to gridlock in Stourport and on Stourport bridge. This is unacceptable.			
John Bennett	<a href="#">ALPPS19</a>	Road infrastructure	Object	No	No	Yes	Effective	<p>I read that plan A was a strong possibility due to road infrastructure much more possible.</p> <p>The plan is to build almost as many houses in Stourport as Kidderminster.</p> <p>I believe that there could be 400 new houses in Pearl lane with no mention of the planning permission given to Malvern Hills at the bottom of Pearl abutting WFDC border. I feel that these houses are going to increase traffic on the Dunley road down to the bridge and on top of that the proposed new Doctors surgery just by the bridge. It is difficult enough now without all the extra cars. Centralising the surgery is a good idea but not very practical.</p>	<p>I don't think this part of the plan is viable without finishing the Relief road.</p> <p>Lets face it people are not going to walk and cycle as it is too dangerous. Stourport just hasn't got the capacity for these plans. You have to consider the extra houses that have been built in Cleobury Mortimer and Great Witley, a lot will come through Stourport.</p>	No	
Richard Brine	<a href="#">ALPPS21</a>	AM13.3	Comment	Yes				<p>The statement concerning the A456 adjacent to the Safari Park needs to refer to traffic island on the congestion on a daily basis between the link to the B4190. Proposed developments in the vicinity will increase the congestion.</p> <p>.</p>	<p>The statement concerning the A456 adjacent to the Safari Park, needs to refer to traffic island on the congestion on a daily basis between the link to the B4190. Proposed developments in the vicinity will increase the congestion.</p>	No	
Diana Edwards	<a href="#">ALPPS2</a>	13.5	Object	No	No		Justified	<p>There has been no mention to local residents that the local plan would include using Blakedown as a transport hub. We were told in fact there were no plans to have a small car park for local use as requested by residents. There has never been any mention that green belt land would be used to build 50 houses on, along with the proposed 170 car parking space or That this is in fact to encourage residents from the large housing developments that are to be built e.g. Lea Hall, to use trains rather than cars. However increased car use from the said travellers will make it even more difficult to exit Blakedown for residents. The building of the large estate at Hagley has impacted on traffic queuing to reach Hagley, owing to changes in traffic priorities</p>	<p>I do not wish to make comments here as I am merely a local resident, who would prefer to write a letter than be forced to fill in this form.</p>	No	No.

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								<p>causing delays. Ditto the Belbroughton Road as cars avoid Hagley island. It is horrendous to imagine the impact on Blakedown of traffic entering via Waggon and Churchill Lanes.</p> <p>I don't recall any specific plans for Blakedown station car park being submitted or accepted before this proposal circulated in July to the residents.</p> <p>An electronic form such as this is not the most accessible way of encouraging locals to participate.</p>			
Richard Brine	<a href="#">ALPPS22</a>	AM13.10	Comment					<p>Recommend you add a clause to improve effectiveness of bus/rail links. For example the 125 from Bridgnorth via Bewdley passes the station, but times need integrate with the rail timetable.</p>	<p>Recommend you add a clause to improve effectiveness of bus/rail links. For example the 125 from Bridgnorth via Bewdley passes the station, but times need integrate with the rail timetable.</p>	No	
Highways England Patricia Dray	<a href="#">ALPPS27</a>	Paragraph AM13.11	Object					<p>In Highways England previous response it was recommended to update the Infrastructure Delivery Plan to include a scheme at M5 Junction 4 capable of mitigating the transport implications of the plan at this location. The omission of this scheme is of a concern to Highways England. Without this improvement it is their view that the plan would not be sound.</p> <p>We previously commented on both the Preferred Options consultation undertaken in</p> <p>2017 and the Pre-submission regulation 19 consultation undertaken in December 2018. In these we outlined the potential implications of development traffic on the SRN, specifically at M5 Junction 4.</p> <p>Although M5 Junction 4 is not located in Wyre Forest, the traffic implications of future developments within the district are cross-boundary. M5 Junction 4, in Bromsgrove district, is one of two principal points of access to the SRN, along with M5</p>	<p>The mitigation of cross-boundary traffic impacts on the strategic road network from new growth should receive policy support within the plan and should be treated equally to requirements arising within Wyre Forest.</p> <p>Additionally to reword paragraph 13.11 as follows-</p> <p><i>The District does not benefit from local access to the motorway network (M5); however, <b>M5 Junctions 3 and 4, which lie within Bromsgrove, provide key access from Wyre Forest to the Strategic Road Network for journeys by road. They provide connections to the Black Country and wider West Midlands Conurbation, including Birmingham and</b></i></p>		

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012)

**APPENDIX D: AMENDMENTS TO THE PRE-SUBMISSION PUBLICATION DOCUMENT (JULY 2019) - CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER AM13: TRANSPORT AND ACCESSIBILITY**

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								<p>Junction 3, for longer distance and commuting journeys beginning or ending within Wyre Forest.</p> <p>Following engagement with you we commissioned technical work, including traffic modelling, that has demonstrated that the effects of Local Plan growth in Wyre Forest will exacerbate existing traffic congestion issues on the A491 Sandy Lane arm of M5</p> <p>Junction 4. This is the junction arm used by traffic routeing to or from Wyre Forest.</p> <p>The conclusion of this work was that, due to the connection between these SRN issues and the Wyre Forest Local Plan growth, highway-related intervention will be necessary in order to deliver the overall growth envisioned within the plan.</p> <p>After comparing the updated development quantum and distribution contained within the current plan with the numbers used in our assessment we can confirm that this assessment remains suitable.</p> <p>In our previous response we recommended that an update to the draft Wyre Forest Infrastructure Delivery Plan (IDP) should be made to include a scheme at M5 Junction 4 capable of mitigating the transport implications of the plan at this location.</p> <p>As you are aware, we have worked jointly with Worcestershire County Council to explore the scope</p>	<p><i>parts of the Black Country to the north/east west, and Bromsgrove and Redditch to the south east, <del>and</del> as well as links to Worcester to the south. This in turn provides access to the local principal road network.</i></p>		

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RESPONSES TO CHAPTER AM13: TRANSPORT AND ACCESSIBILITY**

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								<p>of the necessary mitigation works and to develop the transport evidence that demonstrates this need. We are happy to provide any further details of this work although it is our view that the evidence is already sufficient to demonstrate this requirement.</p> <p>In our last response to the plan of December 2018 we advised that additional text should be included in the plan to outline the need for the scheme. The omission of this scheme from the June 2019 update of the IDP is therefore of concern to us. Without this improvement our view is that the plan would not be sound.</p> <p>We set out that, in our view, the current wording of <b>Policy 12 Strategic Infrastructure</b> and <b>Policy 13 Transport and Accessibility in Wyre Forest</b> were insufficient as they did not recognise the cross-boundary issues and that no reference was made to the importance the SRN in accessing Wyre Forest District. We note that para 13.11 has still not been modified as per our recommendation. Consequently, we encourage that the wording is modified as below:</p> <p><i>13.11 (Highways England proposed modification)</i></p> <p><i>The District does not benefit from local access to the motorway network (M5); however, <b>M5 Junctions 3 and 4, which lie within Bromsgrove, provide key access from Wyre Forest to the Strategic Road Network for journeys by road.</b> They provide connections to the <del>Black Country</del> and wider West Midlands Conurbation, <b>including Birmingham and parts of the Black Country to the north/east west, and Bromsgrove and Redditch to the south east, and as well as links to Worcester to the south.</b> This in</i></p>			

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								<p><i>turn provides access to the local principal road network.</i></p> <p>It is Highways England's view that the mitigation of cross-boundary traffic impacts on the SRN from new growth should receive policy support within the plan and should be treated equally to requirements arising within Wyre Forest.</p>			
Richard Brine	<a href="#">ALPPS23</a>	AM 13.15	Support					Support for AM13.15		No	
Richard Brine	<a href="#">ALPPS24</a>	AM13.18	Support					No comments submitted.			
Richard Brine	<a href="#">ALPPS25</a>	AM13.19	Support					No comments submitted.			
Paul Carpenter	<a href="#">ALPPS97</a>	AM13.21	Object	Yes	No	Yes	Justified	<p>These proposals will lead to an increase in traffic around Blakedown, which is already heavily congested on the A 456.</p> <p>Additional traffic from the proposed Lea Castle development wishing to use the station will cause additional requirement for journeys, probably involving Wagon Lane, Churchill Lane and Mill Lane, neither of which are suitable for more traffic than they currently serve. Any 'improvements' to these roads will damage the appeal of the local area, and damaging the environment.</p>		No	
Richard Brine	<a href="#">ALPPS26</a>	AM13.32	Support					Statement needs to recognise that safety is a major issue both in terms of traffic and personal security, particularly for youngsters.	Statement needs to recognise that safety is a major issue both in terms of traffic and personal security, particularly for youngsters.		
Peter Mardon	<a href="#">ALPPS219</a>	Paragraph AM13.35	Comment	Yes	No	Yes	Positively Prepared	I believe traffic congestion is already a problem on the Eastern Gateway into Kidderminster both inwards and outwards. The concentration of developments on the Eastern side i.e. Lee Castle site, will only exacerbate	Planners should give more consideration to the impact developments will bring to the road network in Kidderminster. It does not cope well with the	No	

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								<p>the congestion and will effect the local environment. No consideration seems to be given to residents and communities living in this corridor, when the developments start to take place the extra traffic flows will have a serious impact on their lives. One thoroughfare in particular will feel the full force of it. That is Hurcott Lane, it is already an overused cut through for traffic accessing the main A448 A449 A450 A451 and A456 roads. All this on a lane that was built for horse and cart, not todays heavy traffic volumes. Yet it has never been mentioned when local planning considers developments. Traffic flows will only get worse on the lane. The quality of life for Hurcott Village residents will suffer greatly. For example air pollution, noise pollution, ancient hedgerows destroyed, flora and fauna decimated, dangerous speeding traffic ,HGV drivers ignoring signs, plus extra RTA's. No other community will be more effected than Hurcott Village.</p> <p>AM13.32 Walking and Cycling As to walking and cycling on Hurcott Lane, there are no footpath or cycle lane throughout the length of the lane. Yet the council opened a nature reserve on it. It is far too dangerous to walk or cycle into or out of Hurcott Village and the nature reserve. Hence the nature reserve is inundated by cars.</p> <p>AM13.38 Developers do not care about giving consideration to potential impacts to the local environment. Their soul aim is to build, profit and move on.</p> <p>It is time for the council planners and the Highways to discus the impact that increased traffic volumes will have on the local communities once developments start to take place. Council should do something about it now. Not suck it and see once they are completed. The whole Eastern side will become a giant pinch point.</p> <p>Planners should give more consideration to the impact developments will bring to the road network in Kidderminster. It does not cope well with the present traffic flows. Until this is addressed the Wyre Forest District Local</p>	<p>present traffic flows. Until this is addressed the Wyre Forest District Local Plan will not be sound.</p>		

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RESPONSES TO CHAPTER AM13: TRANSPORT AND ACCESSIBILITY**

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								<p>Plan will not be sound.</p> <p>Developments have to take place, we all know that. Council and planners has a duty of care to all existing residents and communities. New developments should not be at the expense of their well being.</p>			

**APPENDIX D: AMENDMENTS TO THE PRE-SUBMISSION PUBLICATION DOCUMENT (JULY 2019) - CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER AM30: KIDDERMINSTER TOWN**

Respondent	Response No.	Part of Document	Support/ Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Associated British Foods Plc	<a href="#">ALPPS139</a>	Chapter 30 Kidderminster Town	Object		No		Positively Prepared Justified Effective Consistent with National Policy	<p><b>Associated British Foods Plc</b></p> <p><b>Representations in respect of Policy 30 &amp; Site Ref No: FPH/1-The Settling Ponds, Wilden Lane, Kidderminster</b></p> <p>Policy 30 – Kidderminster Town – of the Preferred Options allocated the Settling Ponds (site reference FPH/1) for either employment (Option A - 4.06 hectares) or residential (Option B – 100 houses). In both cases, reference was made to a gross site area of 14.45 hectares, with this land being removed from the Green Belt.</p> <p>Paragraph 30.9 to the Preferred Options noted that:-</p> <p><i>“The allocation for this site for either use is dependent upon the result of detailed hydrological investigation as the site lies immediately adjacent to the Wilden Marshes SSSI”.</i></p> <p>Since the Preferred Options were published for consultation (June 2017), JLL, on behalf of ABF, has commissioned AECOM to provide two studies on the hydrology of the site, in particular assessing whether development of the site could affect the properties of the SSSI with regards to both groundwater and surface water drainage. The scope of these studies have been agreed with both Natural England and Worcestershire Wildlife Trust. The two studies are:-</p> <p>Hydrological Assessment – June 2018</p> <p>Assessment on the Hydrology and Groundwater Sensitivities and Design Options – July 2018.</p>	<p>Please see attached representation and enclosure.</p> <p>The submitted version of the plan should re-instate Option B of the Preferred Options= ie release site FPH/1 from the Green Belt and allocate 4 hectares in this area for 100 houses.</p>	Yes.	The site was previously proposed to be allocated in the Preferred Options. The site has been re-allocated on grounds of potential impact on the adjoining SSSI. We consider these grounds are not valid and have presented evidence to that effect. We would like the inspector, when appointed, to have the opportunity to consider this evidence and ask questions to JLL.



**APPENDIX D: AMENDMENTS TO THE PRE-SUBMISSION PUBLICATION DOCUMENT (JULY 2019) - CONSULTATION SEPTEMBER/OCTOBER 2019  
RESPONSES TO CHAPTER AM30: KIDDERMINSTER TOWN**

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								<p>The first study was sent to Natural England, Worcestershire Wildlife Trust and the District Council in draft in December 2017 and discussed with these bodies at a round table meeting in February 2018. This resulted in the commissioning of the second study, which was sent to Natural England, Worcestershire Wildlife Trust and the District Council in July 2018. This study considered the particular issues of:-</p> <p>Seasonal impact on groundwater.</p> <p>Potential impacts on foundations on groundwater and existing rock ramps to the River Stour.</p> <p>Various issues concerning SuDS, with regards to land use, water quality and discharge, wet ditch, etc.</p> <p>With regards to the first two points, the study concluded as follows:-</p> <p><i>“The hydrogeological and the hydrological conditions at the site have been established by means of desk-based study, intrusive investigations and monitoring of borehole wells. The potential for the development to affect groundwater flows has been assessed using hydrogeological and geotechnical engineering principles. It is considered that the data obtained from these investigations have shown i.e. that development works will not adversely affect ground water flow and recharge of the superficial and bedrock aquifers given the granular and free draining nature of the strata and the limited footprint of foundations and earthworks. The effectiveness of the riverbed rock</i></p>			

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								<p>ramps in maintaining the wetland cannot possibly be compromised given there will be no direct works on the river and given the granular and free draining nature of the strata. It is acknowledged, however, that the assessment of the potential for seasonal influences upon groundwater and surface water levels would benefit from further monitoring to complete a full annual cycle”.</p> <p>It was recommended by AECOM that a further cycle of groundwater monitoring was undertaken. This is currently being carried out.</p> <p>With regard to SuDS, the report concluded as follows:-</p> <p>“At this stage the form that the development will take is still under discussion and this will clearly have a bearing on the discharge volume and water quality that can be expected from the site, and also on the possible drainage layout with regard to the Sustainable Drainage Systems (SuDS). As discussed, an employment development would typically have a greater area of impermeable surfacing and would also likely to have a greater detriment to the water quality than compared with a residential development. However the drainage solutions outlined above demonstrate that for either of these development scenarios there is a well-established approach to developing a SuDS solution (in accordance with the SuDS manual) that would mitigate the impacts of the development on water quality and discharge rates. Subsequently there will be opportunity to further</p>			

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								<p><i>develop the drainage design and potential pollution mitigation, as the proposals of the development become more established. The report also demonstrates a possible means of outfall using the infiltration/distribution trenches that would mimic the existing scenario. The solution could be adapted to discharge by infiltration or to surface waters, whichever is deemed suitable, subject to ongoing groundwater investigation and proposed finished ground levels. It is considered that this solution would minimise the risk to the SSSI wetland area resulting from changes to the upstream surface water regime as a result of the development”.</i></p> <p>This report has been reviewed by Natural England. A letter, dated 9 November 2018, was issued by Natural England as part of its discretionary advice service. A copy of this letter is provided as an appendix to a recent report produced by Environmental Bank on behalf of JLL on the mitigation of indirect impacts to the SSSI. This report, which will be forwarded to Natural England and Worcestershire Wildlife Trust once representations have been made to the Pre- Submission Publication Draft Plan, forms <b>Enclosure No. 1.</b></p> <p>The letter from Natural England acknowledges that it:-</p> <p><i>“...is satisfied that the consultants have a clear understanding of the complex relationship between the River Stour, the SSSI and the application site. As a result the report describes accurately the</i></p>			

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								<p><i>hydro(geo)logical challenges faced in developing the site”.</i></p> <p>With regards to groundwater, Natural England concludes in its letter that:-</p> <p><i>“The report demonstrates that there are ways of developing the proposed allocation site which are unlikely to lead to the site’s physical development interfering with the way in which groundwater moves across the site.”</i></p> <p>The letter from Natural England then goes on to consider surface water drainage. It considers that:-</p> <p><i>“The treatment of surface water and the general drainage of the proposed allocation site however is significantly more challenging.”</i></p> <p>It refers to the two options put forwards by AECOM in its report – infiltration (Option 1) and attenuation through distribution trenches (Option 2). It considers that:-</p> <p><i>“The challenge for the first approach [i.e. infiltration] is that as the ground water is near to the surface then the area of ‘soakaway’ Sustainable Drainage Systems (SuDS) required to take the volume of surface water from the site will need to be large in order to accommodate the volumes needed to be discharged. This would reduce the area available for development.”</i></p> <p>The letter then goes on to state that:-</p> <p><i>“In order to conserve the SSSI and</i></p>			

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								<p><i>take account of the wetland habitats' on going period of recovery following the construction of the rock ramps in the River Stour in 2010 Natural England advises that the chosen approach should mimic 'natural' processes. Option 1 ('infiltration options') offers this approach."</i></p> <p>AECOM's interpretation of this is that Natural England accepts that Option 1 – infiltration – can help to conserve the SSSI and, therefore, is a suitable design concept. However, AECOM does not consider that the SuDS system would reduce the development area to any significant degree.</p> <p>The second point is considered further in a technical note produced by AECOM This note is appended to the Environment Bank report in <b>Enclosure No. 1</b>. This technical note concludes:-</p> <p><i>"In summary this report has shown that a SuDS solution, where infiltration is not provided, is likely to take up about 6%-7% of the total development area. Where infiltration can be provided (as requested by Natural England) it may be possible to reduce this area further. It is clear that a SuDS design, undertaken as an integral part of the master planning design of the site, can be accommodated within the scheme without significant loss of the development land. When comparing the impact of a land take required for SuDS on the developable area, with the land take required for other uses, it is also clear that other layout and design decision will have a far greater impact on the land take, and</i></p>			

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								<p><i>therefore provision of an appropriate SuDS scheme should not be a blocker to development."</i></p> <p>AECOM's technical note refers to other design options which could reduce further the land take for an infiltration based surface water drainage system. These include detention basins within the buffer between the development area and the SSSI, or within the open space to the south of the developable area, or new technologies (such as source control) to manage surface water without relying on large detention basins.</p> <p>For these reasons, AECOM has advised JLL that the concerns of Natural England about the potential hydrological impacts of residential development of the site on the SSSI, as referred to in the Preferred Options, has been answered. It is clear from the evidence provided that development of the site will have no adverse impact on the SSSI for reasons of either groundwater or surface water drainage.</p> <p>Following the publication of the Preferred Options for consultation in June 2017, Natural England and Worcestershire Wildlife Trust referred to other concerns about development of the site in terms of their potential indirect impact on the SSSI. These concerns were articulated by officers of Natural England and Worcestershire Wildlife Trust at the round table meeting hosted by the District Council in February 2018. It was agreed that Environment Bank address these concerns in a separate report; the scope of which was</p>			

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								<p>agreed subsequently by Environment Bank, Natural England or Worcestershire Wildlife Trust.</p> <p>Environment Bank produced this report and submitted it to Natural England and Worcestershire Wildlife Trust in May 2018. It set out in outline mitigation measures or strategies to address the following potential negative indirect impacts:-</p> <p>Prevention of ongoing management.</p> <p>Increased light disturbance.</p> <p>Increased noise disturbance.</p> <p>Increased human disturbance.</p> <p>Edge effects.</p> <p>Increased risk of prevention.</p> <p>Invasive species introduction.</p> <p>SSSI isolation and impacts to wildlife corridor.</p> <p>Loss of SSSI supporting habitat.</p> <p>Natural England reviewed this report under its discretionary advice service, with its advice formulated in a letter dated 28 June 2018. This letter forms also an appendix to the Environment Bank report in <b>Enclosure No. 1</b>.</p> <p>In this letter, Natural England stated that it:-</p> <p><i>"...welcomes the production of this report for its inclusive approach to the range of habitats and species and their interrelationships that together</i></p>			

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								<p><i>form a functioning ecosystem at Wilden Marsh &amp; Meadows SSSI. We acknowledge the logical and technical approach applied to the various themes described in the report."</i></p> <p>In summary, the letter from Natural England advised that:-</p> <p><i>"... while the mitigation and proposed 'net gain' approach appears theoretically feasible, Natural England is not yet satisfied that the proposed allocation of land for development at the former settlements ponds is not likely to damage any of the interest features of the Wilden Marsh &amp; Meadows SSSI. The key things that need further consideration are:-</i></p> <p><i>Mitigation – detailed design including how to deal with synergistic/cumulative effects.</i></p> <p><i>Delivery of mitigation in practice over the long term – funding, maintenance, monitoring and duration of the associated 'mitigation package'.</i></p> <p>The letter then goes on to advise that:-</p> <p><i>"We acknowledge that you will wish to judge whether and when it is appropriate to address such detail. Nonetheless significant uncertainty exists regarding the design of the proposed mitigation, how measures for hydro(geo)logical and indirect/disturbance related impacts (including synergistic/cumulative effects) will be reconciled, secured and effectively delivered over a</i></p>			



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								<p><i>suitably long duration”.</i></p> <p>Environment Bank has advised JLL that it considers the level of detail requested goes well above and beyond that required for an allocation; instead, it is a level of detail normally associated with a planning application. Indeed, this possibility is acknowledged by Natural England in its letter. In addition, Natural England states that the mitigation measures proposed by Environment Bank are likely to be feasible. Ordinarily, this would provide sufficient evidence for an allocation to pass the tests set out by the Framework of being suitable, sustainable and achievable.</p> <p>Notwithstanding this point concerning the necessary burden of proof for technical evidence at this stage of the development process, JLL, on behalf of ABF, has sought to work with Natural England and Worcestershire Wildlife Trust to try to provide the degree of comfort requested. They have been encouraged to do so by receipt of the second letter from Natural England, dated</p> <p>9 November 2018 (and referred to above in respect of the hydrological assessments by AECOM).</p> <p>In this more recent letter, under the heading of “Next steps” Natural England advises:-</p> <p><i>“The conceptional ‘infiltration options’ approach presented in the report needs to be set alongside the issues described in our advice letter dated 28.6.2018 (SSSI indirect</i></p>			

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								<p><i>impacts – mitigation brief). The functionality of the chosen hydro(geo)logical solution, in terms of design effectiveness, including management and maintenance into the long term will be critical. The overall objective should be to show whether a design solution <b>can</b> be devised that reconciles satisfactory the various ecological considerations.” (Our emphasis)</i></p> <p>The latest report of Environment Bank, December 2018 (forming <b>Enclosure No. 1</b>), responds to this brief and provides significantly more detail on these issues. Specifically, it covers:-</p> <p>The latest hydrological study and a feasibility of surface water drainage by infiltration (as summarised above).</p> <p>Proposed increased buffer widths separating the development area and the SSSI land.</p> <p>A significantly increased margin to the north (to 70m) to ensure this area does not become isolated and remains robust against edge effects.</p> <p>Lighting strategy and measures to minimise light pollution.</p> <p>Noise reduction measures.</p> <p>Other development design issues, such as road layout and orientation of houses.</p> <p>Strategies to adopt to prevent the spread of invasive species.</p> <p>The risk of increased predation by</p>			

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								<p>cats and how to combat this.</p> <p>Prevention of public access through the SSSI and formulisation of walking routes through the site instead.</p> <p>Habitat restoration.</p> <p>Long term delivery of management plans.</p> <p>The strategies and measures to prevent or reduce light and noise disturbance, relative to the ambient levels in the surrounding area (which is largely developed for both housing and industry), have been informed by expert advice from AECOM. Technical notes on these two issues, along with the potential design of SuDS, form appendices to Environment Bank's report (<b>Enclosure No.1</b>).</p> <p>Environment Bank considers that this further study should provide Natural England and Worcestershire Wildlife Trust sufficient confidence that a design solution can be devised that reconciles the now accepted approach to surface water drainage with the mitigation of strategies and measures for the other indirect impacts. In the light of this further information, Environment Bank considers that the level of uncertainty on these issues is no longer significant to the extent that the site cannot be safely identified for housing development at the proposed scale.</p> <p>The site is no longer allocated for development. The Pre-Submission Publication draft does not identify the site for either housing or employment. In addition, the site is</p>			

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								<p>no longer proposed to be released from the Green Belt. The reason provided by the Summary of Consultation Responses (appendix 3B) is:-</p> <p><i>“Due to impact on adjacent SSSI.”</i></p> <p>Further detail is provided in the Site Selection Paper (October 2018). It refers to:-</p> <p><i>“Advise impact on adjacent SSSI from noise, lighting, pets, people, hydrological uncertainties”.</i></p> <p>Given the effort applied by JLL, and its technical consultants, in providing the information requested by Natural England and Worcestershire Wildlife Trust, this is extremely disappointing. It is clear from the above that these reasons or concerns, voiced by consultees in 2017 in response to the Preferred Options, are no longer valid. Instead, AECOM has established to Natural England’s satisfaction that there are no hydrological uncertainties. In addition, the more recent work by Environment Bank, with the support of AECOM, provides evidence that any adverse impacts on the SSSI can be mitigated appropriately and managed accordingly by a well-designed housing development.</p> <p>For this reason alone, we contend the Council should reconsider the allocation of this site for residential development of 100 houses.</p> <p>In addition, as referred to in the previous representations to the Preferred Options, there are other strong grounds why the site should</p>			

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								<p>be released from the Green Belt and allocated for residential development</p> <p>The site does not make a significant contribution to the Green Belt in terms of fulfilling the five purposes of the Green Belt referred to by the NPPF (paragraph 134). This view has been endorsed by the Second Stage Green Belt Study (AMEC 2017 and updated in 2018), as referred to by paragraph 7.11 of the Pre-Submission Draft Plan, which considers that the site holds no distinctive role in preventing the merger of Kidderminster and Stourport.</p> <p>In addition, JLL considers that development of the site will not lead to further encroachment of the wider Green Belt area. The site is adjacent to built-up areas to the north and east. The SSSI of Wilden Marsh, directly to the west, will preclude any further development to the north, west and south of the site. Furthermore, land to the east falls within Flood Zones 2 and 3 and, therefore, poses a constraint to further development beyond the site boundary. The release of the developable part of the site for housing will not threaten the permanence of the Green Belt boundary in this location.</p> <p>The site is in a <b>suitable</b> and <b>sustainable</b> location for built development, particularly for housing. Its principal attributes are:-</p> <p>Brownfield.</p> <p>Adjoining existing settlement of Kidderminster.</p>			

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								<p>Located in a largely established residential area with associated facilities (e.g. schools, formal recreation and other amenities).</p> <p>Close to employment areas, with this linkage improved by the construction of the Hoo Brook Link Road to the Stourport Road employment corridor.</p> <p>Easily accessible to Kidderminster town centre.</p> <p>Strong links to existing main road network and all other modes of transport (e.g. rail, bus, cycling and walking), with the railway station less than 2km away from the site.</p> <p>The site is <b>available</b>. It is under one ownership (ABF), with no legal ties, and is surplus to requirements. It formed part of the settling ponds to the long disused, and now developed, British Sugar factory in Stourport Road.</p> <p>The gross site area of the settling ponds is 14.4 hectares. However, only the northernmost 4 hectares is being promoted for built development, due to the existing and potential ecological interest of the southern half of the site (mostly based on wetlands formed by the old settling ponds) and its potential for recreation, amenity, and bio-diversity enhancement.</p> <p>The site is <b>deliverable</b> for built development. This has been demonstrated by an evidence base produced by a professional consultant team assembled by ABF</p>			

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								<p>and shared with the Local Planning Authority. This evidence base includes:-</p> <p>Development Prospectus, February 2015 (as a response to a “call for sites”), JLL.</p> <p>Transport Appraisal, April 2017, DTA.</p> <p>Phase 1 Hydro-geological and Geo-environmental Assessment, April 2017, AECOM and subsequent reports (as referred to above).</p> <p>Landscape and Ecological Management Plan, June 2017, Tyler Grange.</p> <p>Bio-diversity Accounting Report, June 2017, Environment Bank.</p> <p>The Development Prospectus forms <b>Enclosure No. 2</b>. It describes the principal site characteristics, summarises the relevant ecological considerations, and provides an analysis of the site constraints and opportunities. This prospectus provided the basis for discussions and consultation with the Local Planning Authority, Natural England and Worcestershire Wildlife Trust prior to the allocation of the site by the Preferred Options and covered:</p> <p>how development of the site could protect the interests of the SSSI;</p> <p>the principal measures to be put in place (e.g. a buffer protection zone around the proposed development area and retention of cattle corrals);</p> <p>the extent of the site to be retained</p>			

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								<p>(mostly wet scrub and woodland);</p> <p>the potential amenity and recreational benefits; and</p> <p>to identify clearly the developable area of the settling ponds (circa 4 hectares in the northern half of the site).</p> <p>The Transport Appraisal forms <b>Enclosure No. 3</b>. It considers the potential for both residential development and industrial development of the allocated site. Its principal conclusions are:-</p> <p>The site is located within an easily accessible area, with frequent bus services.</p> <p>The site would generate modest vehicular movements on the local highway network.</p> <p>There is sufficient adopted highway land at the A449/A422/Chester Road South/Wilden Lane roundabout to make minor improvements and to accommodate development traffic without causing an increase in queues or delay.</p> <p>Consideration could be given to the development financing improvements to the local pedestrian and cycle network (i.e. provision of a footway along the northern/western carriageway of Wilden Lane) and providing existing bus shelters north of the site in Wilden Lane with timetable information to increase their attractiveness for use.</p> <p>The site has good visibility splays</p>			



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								<p>and could be accessed by either a simple priority T-junction</p> <p>(for residential) or a priority junction with right turn lane (for employment).</p> <p>There are no constraints to development at this location and either development scenario can be delivered which would fully accord with the NPPF.</p> <p>The initial hydrological assessment of 2017 has been superseded by subsequent more detailed studies. These are referred to above. They have satisfied Natural England that development of the site for housing will not cause detrimental impact on the SSSI for reasons of groundwater or surface water drainage.</p> <p>The Landscape and Ecological Management Plan forms (<b>Enclosure No. 4</b>). It was prepared to provide certainty that ecological issues associated with the development can be addressed and opportunities for overall bio-diversity gain can be achieved. It describes the issues, site potential, management objectives and prescriptions to deliver these over a 25 year period.</p> <p>The Bio-diversity Accounting Report also forms an appendix to <b>Enclosure No. 1</b>. It appraises the Landscape and Ecological Management Plan. It concludes that the enhancements it proposes to the wider site (i.e. the balance of the 14 hectare site not proposed for development and outside ABF's ownership of the SSSI) would result in a significant net bio-diversity gain in terms of priority</p>			

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								<p>grassland habitats, priority wet woodlands and scrub mosaic and open water habitats, under a</p> <p>like-for-like bio-diversity compensation strategy with long term management. The proposed enhancements could result in strategic compensation by contributing to and buffering an existing ecological network, as well as delivering significant bio-diversity gains given that there is scope for bio-diversity enhancement. As such, it concludes that the proposed Landscape and Ecological Management Plan would be suitable to compensate the bio-diversity impacts of the proposed development of 4 hectares and achieve net gain.</p> <p>The site lies wholly in Flood Zone 1, according to the latest flood risk map available on the Environment Agency website. It sits on raised land above the adjoining SSSI marshland and is not at risk of flooding.</p> <p>As the site is <b>suitable, sustainable, available</b> and <b>deliverable</b>, JLL considers that the allocation of the site for built development meets the principal tests set out by Government guidance. Moreover, its development will ensure that the Local Planning Authority meets its Objectively Assessed Needs for housing and enables the wider planning benefits generated in respect of the proposed ecological and recreational enhancements to the land to the south (as referred to above).</p> <p>Finally, JLL has considered the viability of both residential and</p>			

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								<p>industrial development of the site and has provided the Local Planning Authority financial appraisals. These appraisals demonstrate clearly that the proposed residential development (as promoted by Option B of the Preferred Options) is <b>achievable</b>. In addition, it demonstrates that residential development for 100 houses could afford and enable the desired ecological and recreational planning benefits being promoted, as well as potentially financing the long term management of the SSSI marshland currently under ABF's ownership.</p> <p>In summary, JLL contends that the submitted version of a plan should re-instate Option B to the Preferred Options – i.e. release the site from the Green Belt and allocate 4 hectares in this area for 100 houses – on the following grounds:-</p> <p>Natural England now accepts that its principal concern – the effect of development on ground water properties for the SSSI – is unfounded and that surface water drainage to the site is feasible without damaging the interests of the SSSI.</p> <p>Environment Bank, on behalf of JLL, and with the support of AECOM, has demonstrated that other perceived and potential indirect impacts on the SSSI can be managed effectively by good design.</p> <p>The site does not make a significant contribution for Green Belt, with the Council's Second Stage Green Belt study concluding that the site holds no distinctive role in preventing the merger of Kidderminster and</p>			

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								<p>Stourport.</p> <p>The site is suitable, sustainable, available, deliverable and achievable and passes all the relevant tests set out by the Framework and other Government guidance on the allocation of sites for housing.</p> <p>To include site FPH/1 in the pre-submission plan. Believe that any adverse impact on the SSSI can be mitigated appropriately and managed accordingly by a well designed housing development. The site does not make a significant contribution to the Green Belt in terms of fulfilling the five purposes outlined in the NPPF. The site is in a suitable and sustainable location, it is available, deliverable for built development, and is achievable.</p> <p>The submitted version of the plan should re-instate Option B of the Preferred Options-- ie release site FPH/1 from the Green Belt and allocate 4 hectares in this area for 100 houses.</p>			
Bloor Homes (Western)	<a href="#">ALPPS76</a>	AM30.0.1	Comment					<p>BHW acknowledge that the current consultation is a focused consultation seeking comments on a relatively narrow set of issues, which has arisen following the Pre-Submission consultation that the Council undertook and completed at the end of 2018. In seeking comments on the amendments it is also acknowledged that the Council are not looking to revisit the overall strategy set out in the Pre-Submission Draft Plan (2018), nor looking to make any amendments to the overall quantum of development proposed to be</p>		Yes	

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								<p>accommodated in the District.</p> <p>Furthermore, whilst the Council are proposing limited revisions to its proposed allocations, on the whole, the sites now included in the Plan are the same as those that were previously published in 2018. BHW do not, therefore, object in principle to any of the draft residential allocations included in the Plan. Clearly, other promoters/representors may have a stronger view on the deliverability of certain sites and allocations, which no doubt will play out in full at the Examination. Subject to how an Inspector may view these discussions, there may well be a need for the Council to consider either additional or alternative sites to meet its needs going forward. The land at Hurcott Lane is, therefore, submitted to the Council on the basis that if additional land for either employment or residential is needed, then it should be considered accordingly BHW support the Council's overall spatial strategy of seeking to focus the majority of new housing and employment development in the 3 main settlements in the District, including a large Sustainable Urban Extension (SUE) on the eastern side of Kidderminster. Furthermore, BHW also agree that there are exceptional circumstances to release land from the Green Belt in the District and again support the intention to release land from the Green Belt on the eastern side of Kidderminster to meet the development needs of the District over the Plan Period.</p> <p>The Council's spatial strategy for development seeks to focus a significant amount of new</p>			

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								<p>development on the eastern side of Kidderminster, and as such, it is accepted that it is a sustainable location for development. Additional land around the draft SUE has previously been considered in the course of the preparation of Plan, including the land at Hurcott Lane, which is now controlled by BHW. BHW are, therefore, of the view that the eastern side of Kidderminster is an appropriate location for new development as evidenced by the Council's draft allocation in the Plan. Furthermore, BHW contend that should further development be needed, either in the current Plan, or when the Council come to review the Local Plan, that the eastern side of Kidderminster would be an obvious location to look for further opportunities.</p> <p>Clearly, BHW's site at Hurcott Lane, Kidderminster is one such site, that is well located to the draft SUE allocation, and could be considered for future development either within the emerging Plan Period (if needed) or as part of a future Local Plan review. What is clear is that the Council are unlikely to be able to rely on significant quantities of previously developed urban land coming forward in the near future in order to meet future housing and employment needs and that as a result they will have to consider releasing more land from the Green Belt as part of a future review.</p> <p>In light of the point above, BHW support the Council's intention to release additional land from the Green Belt now to meet development needs beyond the Plan Period and to</p>			

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								<p>safeguard this for future development. However, BHW consider that in all likelihood, there will be a need to release even more land than is currently proposed to be safeguarded and that the Council could, and should, take the opportunity now to do so. The land at Hurcott Lane is certainly a site that we consider could be removed from the Green Belt and safeguarded for development beyond the Plan Period.</p> <p><b>Omission Site - Land at Hurcott Lane, Kidderminster</b></p> <p>The land at Hurcott Lane, Kidderminster extends to 33.5 hectares in size and is located on the eastern edge of Kidderminster, on the northern side of the A456, adjacent to the northern extent of the Kidderminster SUE allocation. A site location plan is attached.</p> <p>BHW have undertaken some initial site investigations to assess baseline conditions and to identify constraints and opportunities and this has informed an initial concept master plan, a copy of which is also attached for information. The key elements to draw from the master plan is that access to the site is proposed off the A456 via a new junction, which will serve both the residential and employment uses. An indicative capacity of approximately 400 dwellings could be accommodated on the site at a density of 30 dph along with 7.4 hectares of employment land. New public open space can be accommodated on the site providing a buffer between new development and the nature conservation interests</p>			

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								<p>to the north. The development offers the opportunity to relieve traffic movements from part of Hurcott Lane and provide a safe, designated access solution via the new roundabout.</p> <p>The need to consider other omission sites such as the land at Hurcott Lane may arise if deliverability issues arise on other allocated sites. For example, if the Lea Castle strategic allocation does not deliver as expected, this would leave a gap in the housing trajectory that would need to be filled elsewhere. We, therefore, reiterate that Hurcott Lane could and should be considered for release from the Green Belt, and allocation for residential development if it becomes apparent that there are issues with the Council's supply of housing and trajectory. We, therefore, conclude that development of the site will deliver new housing and employment development. As such, BHW confirm that the site is suitable, available and achievable and should be considered for allocation if there is a need that arises during the course of the Examination.</p>			
Richborough Estates Ian Deverell	<a href="#">ALPPS197</a>	AM30.51 WA/KF/3 Land North West of Habberley Road	Comment					<p>The further pre-submission draft consultation paper maintains the allocation of land north west of Habberley Road (WA/KF/3) through Policy 30.21, recognising it as a suitable, deliverable location to assist in meeting Wyre Forest's housing needs.</p> <p>Richborough Estates welcome that a more detailed reasoned justification has now been provided for allocation WA/KF/3 as an amendment to the</p>			



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								<p>previous wording , which is set out below:</p> <p><i>'The site is located on the NW edge of Kidderminster's urban area, approximately 1.5km from the town centre. The retention and enhancement of the western hedgerow boundary will allow for an improved residential edge to Habberley when seen from the north and provide a strong defensible Green Belt boundary. The site has good access to local shops and schools. The impact of any development on the nearby Habberley Valley Nature Reserve and Local Wildlife Site should be taken into account.'</i></p> <p>This additional wording establishes a clearer picture for the site, its location adjacent to the north western edge of Kidderminster as well as the identification of key constraints and opportunities for the site.</p> <p>To assist in delivering the clear design aspirations as identified within revised wording of Policy 30.21, through the detailed masterplanning of t he site, Richborough Estates has proposed a revised Location Plan (Drawing Ref. n1204 004 001-01 Rev B) (enclosed at <b>Appendix 3</b>). In light of the revised allocation wording we are proposing an amendment to the allocation boundary which would include land to reinforce and formalise the Green Belt boundary. This additional land would retain Green Belt status whilst demonstrating that development of the Site will enhance existing hedgerows and trees. The open space strategy will also see the creation of a</p>			

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								<p>new, permanent and defensible Green Belt boundary to the west of the Site.</p> <p>Our revised Illustrative Masterplan will allow for the delivery of a minimum 120 dwellings in a highly sustainable location within the defined allocation area, whilst also delivering an enduring Green Belt boundary, which once fully mature, will stand up to the rigours of the NPPF Paragraph 134.</p> <p>As previously identified, various technical assessments have informed the preparation of a testing layout for the Site. It is agreed that the Site can accommodate a minimum of 120 residential dwellings, and the Illustrative Masterplan enclosed at <b>Appendix 2</b>, shows that the Site could accommodate up to 135 dwellings while still complying with all policy requirements of Design, housing mix, affordable housing, public open space and Sustainable Urban Drainage. The final number of dwellings to be delivered on Site will be determined as part of the development management process and not limited by the indicative number expressed within the allocation of the Site; thus satisfying the economic, social and environmental strands of sustainability as set out in the NPPF.</p> <p>The site is not constrained and can deliver housing immediately, with the potential for the site to be fully delivered within three years and therefore able to make a significant contribution to the Council's five year housing land supply.</p> <p>The site is suitable, available now and</p>			

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								achievable now. Work to date demonstrates that there are no issues which would preclude development.			
Peter Owen	<a href="#">ALPPS208</a>	AM30.51	Object	No	No		Positively Prepared Justified Effective	<p>Many years ago the fields were smaller and in the name of progress hedges were taken out and now there is what's left from the past. The impact on the area to the road services, the sewage system - the Low Habberley Sewage runs down where the fields are. Major upheaval for nature and environment!</p> <p>The impact of traffic from the new housing Habberley Lane or Habberley Road? The neighbouring roads are already overstretched and it can feel dangerous. If you have at least another 200 cars on the road in this part of Kidderminster it will have a very negative impact on nature. Where on earth the council planning office can talk about enhancing biodiversity I do not know. There is a historic problem going back over 50 years with drains taking rain water from Low Habberley which after many attempt to rectify the majority of the water still goes on to the field adjacent to Ferndale Estate.</p> <p>There is a tremendous amount of brownfield side in and around Kidderminster that has never been developed and should be looked at first.</p> <p>The Stourbridge Road before the Park Gate - there is a new development that has gone up in the last 6 months.</p>	<p>Leave it as it is. Because if you start building now as it will be only a period of time the land will be decimated up to Low Habberley. The still present nature - what's left of it now will be totally lost for our generation and the next generation and the generation to come. There might be pressure from the owner of the land - as they will make a huge amount of money but you should be able to expect to council to protect the interest of local residents</p>	Yes	But I would appoint somebody to speak on my behalf
Kidderminster Foreign Parish Council  Elsie Whitehouse	<a href="#">ALPPS14</a>	Paragraph AM30.51	Object	No	No	No	Positively Prepared	Believe that the additional sentence in paragraph AM30.51 in the amendments of the pre-submission local plan for the reasoning of site WA/KF/3 Low Habberley Road is		No	

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								<p>unsound.</p> <p>1) "Close to local shops and schools"? This was not mentioned in the 2018 document. It is not particularly close to either.</p> <p>2) "The retention and enhancement of the western hedgerow boundary will allow for an improved residential edge to Habberley when seen from the north and provide a strong defensible Green Belt boundary."? Isn't the current road a more defensible Green Belt Boundary? and yet that is being breached!</p> <p>3) "The impact of any development on the nearby Habberley Valley Nature Reserve and Local Wildlife Site should be balanced out through biodiversity net gain."</p> <p>We fail to see how a development of 120 houses is going to add to biodiversity.</p> <p>Lack of publication in 2018, and now there are alterations - on page 44 there is a revised reasoned justification for WA/KF/3 Land at Low Habberley. The one line from the previous document is to be deleted and the following is to replace it:</p> <p>"The site is located on the NW edge of Kidderminster's urban area, approximately 1.5Km from the town centre. The retention and enhancement of the western hedgerow boundary will allow for an improved residential edge to Habberley when seen from the north and provide a strong defensible Green Belt boundary. The site has good access to local shops and schools. The impact of any development on the nearby</p>			

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								Haberley Valley Nature Reserve and Local Wildlife Site should be balanced out through biodiversity net gain.”  We feel that this reasoning is unsound.			
Margreth Becker	<a href="#">ALPPS204</a>	AM30.51	Object	No	No	No	Positively Prepared Justified Effective	I do believe the paragraph relating to built up part of Low Haberley land and stating that one of the hedges is a natural boundary and that an estate will support biodiversity is straight out of 1984 from George Orwell. The paragraph does not make any sense at all. The hedge concerned is not a natural barrier and how can biodiversity be enhanced by building an estate next to a nature reserve, Light and noise pollution, at least 200 more cars, something would need doing to these roads, already congested enough and busy. more dogs and cats and people and more rubbish to be picked up by some. So many attempts to raise awareness that there is a crisis on the earth but it all seems to have bypassed some of the council planners and is there pressure from the Land Owner?, Who is behind the Sir Thomas White Trust?	The aim should be not to built on Green Belt and certainly not Green Belt next to a nature reserve , Use up your brown sites first and negotiate with the owners of these empty buildings in Kidderminster. Aim for green economics	Yes	I am happy to voice my views.
Richard Wilcox	<a href="#">ALPPS218</a>	Paragraph AM30.51	Object	No	No	No	Justified Effective	AM30.51 "The site is well contained by solid boundaries on three sides. The site is located on the NW edge of Kidderminster's urban area, proximately 1.5km from the town centre. The retention and enhancement of the western hedgerow boundary will allow for an improved residential edge to Haberley when seen from the north and provide a strong defensible Green Belt boundary. The site has good access to local shops and schools. The impact of any development on the nearby	Remove the land in question from the plan. Look instead at development of more housing in the town centre. Housing does not need to be classical two or three bed semis surrounded by garden. Very many people do	No	

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								<p>Haberley Valley Nature Reserve and Local Wildlife Site should be balanced out through biodiversity net gain "</p> <p>The new justification for inclusion of the site states that the hedgerow will provide "a strong defensible boundary to the Green Belt." I cannot see how this statement is at all justifiable. The ROAD is surely a clear boundary to the Green Belt - much easier to defend than a hedgerow. To move the boundary of the Green Belt to the hedgerow of the field that it is proposed to include for development will surely be a precursor for further intrusion into the Green Belt in the future.</p> <p>To say that "The impact of any development on the nearby Haberley Valley Nature Reserve and Local Wildlife Site should be balanced out through biodiversity net gain" is like saying that, "The fires in the Amazon rainforest are a good thing because there will be introduction of new species such as humans, horses and maize plantations". If the field is developed, then the adjacent areas become less attractive to wildlife because of the impact of the people, their dogs and cats, light and noise. I understand that the main driver for this land to be developed is pressure from the landowner. What a surprise - Once classed as building land rather than Green Belt agricultural land, the monetary value of the land soars. At the very beginning of this process in the "call for sites" it was made very clear that there was no obligation on the Council for any site offered actually to be developed.</p>	<p>not want a garden in the first place. Where really good apartments have been developed in town centres along with suitable services they have been spectacularly successful and popular (witness the mailbox area of Birmingham). I see in the Plan there is a proposal for some housing and a cinema on the site of the former Glades Leisure Centre. I would ask if there is anyone with a proposal and money actually to develop a cinema as a going concern? I frequent the Reel cinema and it is very common for the audience to be a dozen or and the vast majority of seats vacant. Plans cannot escape the</p>		

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									reality of the impact of the internet both on shopping (Amazon et al) and entertainment (Netflix et al). Why not make the whole site housing and allow small local restaurants to spring up to service the adjacent population?		
Maria Davies	<a href="#">ALPPS62</a>	Policy 30.29 Former Burlish Golf Course Clubhouse	Comment					I would like to add that new land re old golf course Burlish meadow existing buildings, such as the old club house and barn/store should be sold to someone willing to preserve these buildings (if possible structurally) to provide one family home and one barn conversion, whereas there will be residents to look out for the reserves in the future. This is much needed funds to be obtained for the council and a considered need to regenerate that area. It was neglect by the council that brought about the arson attack on this fine building.		No	
Burlish Concerned Residents  Tim Hollis	<a href="#">ALPPS79</a>	Paragraph AM30.70	Object					<b>LI/11 - Land west of former school site Coniston Crescent</b> - All comments made in relation to the Pre-Submission Local Plan (October 2018 version) pertain.  A comment was made by one of the staff at the drop-in session at the Stourport Civic Centre on 28-09-19 that, in the event of houses being built, to control traffic flows and eliminate its use as a de facto		Yes	I would wish to exercise my democratic right to ensure that our comments are heard, considered and recorded.

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								<p>northern ring road around Stourport, Buggy Lane/Kingsway might be blocked to traffic at some point along its length so forcing Bewdley bound traffic to use Windermere Way or Minster Road/Bewdley Road North. This would increase traffic through Burlish Park estate via Windermere Way where two schools and a sixth form have access and would have no beneficial effect upon Burlish crossing.</p> <p><b>MI/38 - School site Coniston Crescent</b> - All comments made in relation to the Pre-Submission Local Plan (October 2018 version) pertain.</p> <p>As with LI/11 the same comment made by one of the staff at the drop-in session at the Stourport Civic Centre on 28-09-19 applies that, in the event of houses being built, to control traffic flows and eliminate its use as a de facto northern ring road around Stourport, Buggy Lane/Kingsway might be blocked to traffic at some point along its length so forcing Bewdley bound traffic to use Windermere Way or Minster Road/Bewdley Road North. This would increase traffic through Burlish Park estate via Windermere Way where two schools and a sixth form have access and would have no beneficial effect upon Burlish crossing.</p>			
Worcestershire Wildlife Trust  Steven Bloomfield	<a href="#">ALPPS99</a>	Policy AM30.30	Comment	Yes	Yes	Yes		We are particularly pleased to note the commentary set out in Part 3 of this policy and consider that the wording around delivery of biodiversity net-gain and appropriate landscape buffering to the nearby nature reserve is critical to ensuring that the policy is both sound and			



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								consistent with national policy (see for example paras. 170, 171 and 175 of the National Planning Policy Framework).			
Worcestershire County Council, Planning Economy & Performance	<a href="#">ALPPS117</a>	AM30 Land off Zortech Avenue, LI/13	Support					<p>We are pleased to note that the site-specific policy AM30.30 for the new allocation “Land off Zortech Avenue LI/13”, proposed as part of the current consultation, includes a requirement for a minerals resource assessment.</p> <p>We regret, however, that other recommendations we made to ensure the plan is sound have not yet been addressed. As such, we wish to stress that - with the exception of the section titled ‘Sustainable Transport’, and subject to ongoing DtC discussions between WCC and WFDC officers - the comments submitted by WCC and dated 17th December 2018 remain extant and should be taken into account.</p>			
Worcestershire Wildlife Trust	<a href="#">ALPPS100</a>	Policy AM 30.31	Comment	Yes	Yes	Yes		<p>We note the contents of this important policy and we are pleased to support sub-sections 3 and 4 in particular. We consider that these elements of the policy are essential to delivering sustainable development of the SKEP that pays appropriate regard to the important nearby designated sites. However, we are concerned that the current wording of the policy may be taken to suggest council support for development of the Settling Ponds (previously listed as FPH/1 – Former British Sugar Settling Ponds, Wilden Lane, Kidderminster). We supported the deletion of this site from the plan during previous rounds of consultation.</p> <p>FPH/1 partially overlays Wilden</p>	We recommend amending the policies map by removing the SKEP annotation from Wilden Marsh and Meadows SSSI and the adjacent site ‘FPH / 1 - Former British Sugar Settling Ponds, Wilden Lane, Kidderminster’. In addition we recommend that you amend the wording of	No	

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								Marsh & Meadows SSSI and development here would be contrary to the Nature Recovery Network approach advocated in the Government's Emerging 25-year Environment Plan (which seeks to not only protect but also reconnect existing high value sites) and may pose a direct threat to the SSSI itself. This suggests to us that the policy is currently not in conformity with national planning policy (see for example paras. 170, 171 and 175 of the NPPF). This is especially so as we note that the council has already allocated sufficient land for employment development elsewhere in the district.	para 30.74 to reflect the comments set out above. We propose wording similar to  'Although the area of the SKEP covers some natural features and Green Belt land, development will only be permitted on previously developed sites. The site designation lies adjacent to Wilden Marsh and Meadows SSSI and the associated, former settling ponds, Wilden Lane, Kidderminster. Impacts on this land are to be considered as part of any application for development and positive benefits consistent with Policy AM 30 sub-sections 3 and 4 will be secured to enhance this area.'		

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Natural England	<a href="#">ALPPS183</a>	AM30.74 SKEP	Comment	Yes	Yes	Yes		<p>Natural England welcomes revised policy 30.31 South Kidderminster Enterprise Park (SKEP) for its clear criteria dealing with biodiversity issues at sub sections 3 (Worcestershire Canal and Stour corridor) and 4 (Positive enhancement of the Wilden Marsh &amp; meadows Site of special scientific Interest).</p> <p>We refer the Council to our supporting representation on the deletion of FPH/1 from the local plan's allocations. This land falls within the SKEP as shown on the policies map. In the interests of planning certainty, to foster positive environmental outcomes and to be consistent our supporting representation on the deletion of former allocation FPH/1, we believe the policies map and paragraph 30.74's reference to '<u>previously developed sites</u>' must make clear that land at the former FPH/1 site is excluded from this reasoned justification's meaning when referring to previously developed sites.</p> <p>The glossary at Annex 2 of the NPPF offers helpful clarification defining exclusions from the definition including: '<i>...land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape</i>'.</p>	<p><b>Amend the policies map to <u>remove the SKEP annotation from Wilden Marsh and Meadows SSSI and the adjoining former settling ponds west of Wilden Lane AND use revised 30.74 wording as follows</u></b></p> <p><b>Although the area of the SKEP covers some natural features and Green Belt land, development will only be permitted on previously developed sites. The site designation lies adjacent to Wilden Marsh and Meadows SSSI and the associated, former settling ponds west of Wilden Lane. Impacts on this land are to be considered as part of any application for development</b></p>	No	

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									and positive benefits consistent with policy 11(d) secured to enhance this area.		
Worcestershire County Council, Planning Economy & Performance	<a href="#">ALPPS116</a>	Paragraph AM30.74	Comment					<p>To ensure clarity and provide certainty for developers, we recommend that the footprint of the SSSI is excluded from the policies map and additional wording is inserted into paragraph 30.74 to ensure appropriate environmental consideration and to secure environmental betterment through development of the abutting PDL.</p> <p>We regret, however, that other recommendations we made to ensure the plan is sound have not yet been addressed. As such, we wish to stress that - with the exception of the section titled 'Sustainable Transport', and subject to ongoing DtC discussions between WCC and WFDC officers - the comments submitted by WCC and dated 17th December 2018 remain extant and should be taken into account.</p>	<p>We suggest the following wording:</p> <p><b>Although the area of the SKEP covers some natural features and Green Belt land, development will only be permitted on previously developed sites. The site designation lies adjacent to Wilden Marsh and</b></p> <p><b>Meadows SSSI and the associated, former settling ponds west of Wilden</b></p> <p><b>Lane. Impacts on this land are to be considered as part of any application for development and positive benefits</b></p>		

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									consistent with policy 11(d) secured to enhance this area.		

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Taylor Wimpey West Midlands	<a href="#">ALPPS254</a>	Policy AM33 Stourport on Severn Allocations	Comment					<p>This representation relates to land at Rectory Lane, Areley Kings, which is within the control of Taylor Wimpey. The southern extent of Land at Rectory Lane is identified throughout the Local Plan Review evidence base as Site Ref: AKR/15 'Land off Ribbesford Road / Rectory Lane'. However, the land which is being promoted for development by Taylor Wimpey extends northwards beyond Site.</p> <p>Policy AM33 identifies an amended list of site allocations to Stourport-on-Severn. As per the previous consultation, it remains that Land at Rectory Lane, Areley Kings, is not allocated for development.</p> <p>As per our previous representation, it is submitted that the site represents a suitable and deliverable site for residential development, subject to its release from the Green Belt. It is contented that it remains appropriate to allocate this site for development through the Local Plan Review.</p>	It is contented that it remains appropriate to allocate this site for development through the Local Plan Review.	Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Barratt Homes West Midlands	<a href="#">ALPPS156</a>	Policy AM33, Stourport-on-Severn Allocations	Object	Yes	No	Yes	Positively Prepared Justified Effective	<p>Policy AM33 – Stourport on Severn Site Allocations, advises that Site AKR/14 – Pearl Lane, Areley Kings, should indicatively provide 250 dwellings. We understand this figure is based upon the fact that the local authority have concerns regarding the ability of the local primary school (St Bart's) and road network to accommodate a greater amount of development. These matters have been discussed in detail during the course of the pre-application process in preparation for the forthcoming application.</p> <p>It is noted that the 2018 Submission version of the local Plan includes a reference to the fact that the 250 dwelling figures directed to the site can be exceeded if this is justified by appropriate information demonstrating that highways capacity and education are not</p>	Policy AM33 should be amended to refer to the capacity of Site AKR/14 – Pearl Lane, Areley Kings, being approximately 400 dwellings.	Yes	<p>We wish to attend the examination in order to explain to the Inspector the benefits of the delivery of the Pearl Lane, Areley Kings site. Whilst the submission of the Plan suggests that the indicative capacity besides the 250 dwellings, the Site is capable of accommodating significantly more development than this. We would like to attend the examination in order to discuss the evidence demonstrating the site has greater level of capacity in</p>

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								<p>constraints to development. We welcome inclusion of this text. It would be our preferred approach for the policy to confirm that the capacity of the site is 400 dwellings, however, if the Local Authority does not support this revision and the aforementioned text is welcomed.</p> <p>Whilst it is agreed there is a shortfall of primary school places locally, EFM Educational Consultants have been appointed by Barratt to review this matter. Whilst there are a limited number of spaces at St. Bart's it has been established that St Bart's Primary School can be expanded to address any additional capacity requirements using S.106 money. This matter has been discussed with Severn Academies Trust, who manages St Bart's School, who confirmed that they are supportive of this approach. We also understand that WCC Education have no objection to this approach. Two separate meetings have been held with WCC Education where Barratts have advised that are willing to provide the necessary education planning obligations to address any matters that arise as a consequence of a shortfall in available school places. This is a fairly standard position whereby existing school capacity will be created through S.106 payments. This is not, therefore, a constraint for development.</p> <p>In addition, highways work has been undertaken in order to demonstrate the site is capable of delivering more than 250 dwellings. It is our view that the capacity of this Site is closer to 400 dwellings. Ongoing discussions have been taking place with WCC Highways and modelling has been undertaken in order to demonstrate this point.</p>			front of the Inspector.
Taylor Wimpey	<a href="#">ALPPS272</a>	AM33	Comment					Taylor Wimpey is currently in control of the		Yes	

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West Midlands								<p>site known as Land at Bewdley Road North Site Ref: LI/5), as shown on the Site Local Plan previous submitted as part of our Pre-Submission representation.</p> <p>The land is promoted for residential led development, including areas of open space and other supporting infrastructure.</p> <p>A Development Vision document has been prepared to introduce an initial concept master plan for the delivery of the site. This document has previously been submitted to Wyre Forest District Council and pulls together a wide range of technical information collected to date that has been utilised in shaping the initial proposal and provides an indication of how the site could be delivered and will function as an extension to the town of Stourport-on-Severn.</p> <p>The Development Framework identifies the following key features for land at Bewdley Road North where Taylor Wimpey has secured an interest:</p> <ul style="list-style-type: none"> <li>• Circa. 140 dwellings;</li> <li>• Vehicular and pedestrian access from Bewdley Road North;</li> <li>• Delivery of public open space;</li> <li>• Provision of SuDS through the delivery of new attenuation features;</li> <li>• A new enduring Green Belt boundary defined by the northern and western site boundaries.</li> </ul> <p>Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that land at Bewdley Road North within the control of Taylor Wimpey is suitable, deliverable and</p>			



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								<p>developable. This provides confidence that the proposed housing allocation is 'soundly' based.</p> <p><b>Green Belt</b> The site currently lies within the West Midlands Green Belt. The Strategic Review of the Green Belt (September 2016) prepared by Amec Foster Wheeler forms part of the Local Plan Review evidence base. The Green Belt Review assesses a number of parcels of land against the five purposes of the Green Belt as set out within the NPPF.</p> <p>Sites are identified within the Green Belt Review as either making a 'significant contribution', a 'contribution' or a 'limited contribution' to the Green Belt purposes.</p> <p>The site is identified as making a 'contribution' to the purposes of the Green Belt, with the following description:</p> <p><i>"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 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."</i></p> <p>Where sites make a 'contribution' to the purposes of the Green Belt, the Review advises that "...release (either in whole or part) would need to be balanced against</p>			

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								<p><i>various material planning considerations.”</i></p> <p>Regarding the likely effect of development of the site on the openness of the Green Belt, the Review states:</p> <p><i>“Notwithstanding the relatively strong degree of visual connectivity with the open countryside to the north east of Stourport, the effect of development on openness is likely to be tempered by the close relationship with existing urban edge, where rounding off could improve the visual context of this gateway to the town.”</i></p> <p>Taylor Wimpey has considered the release of the site from the Green Belt in the context of the five purposes of the Green Belt as set out in the NPPF and assert that the makes a ‘limited contribution’ to the purposes of the Green Belt, as explored below.</p> <p><b>1) To check the unrestricted sprawl of large built-up areas</b></p> <p>The site has strong, defensible boundaries and would round off the town of Stourport-on-Severn on its north-western boundary. The site is adjacent to existing residential development at the Kingsway and would not extend the built form beyond the northern boundary of this development. This development forms the eastern boundary of the site. Stourport-on-Severn is located south of the site, specifically the residential area of Lickhill Parish which forms the sites southern boundary. The site’s western boundary is formed by Bewdley Road North which already has some residential development to the north of the junction with Lickhill Road/Burlish Crossing. The northern boundary of the site is an agricultural track lined by hedgerows. It should be noted that the northern part of the site would not be developed. This would</p>			

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								<p>mean that the proposed development would be contained well within the existing line of built form at Kingsway and will round- off existing development on Bewdley Road North. This will provide a strong and defined boundary to restrict further expansion and ensure the visual separation of Stourport-on-Severn and Bewdley.</p> <p>The release of the site from the Green Belt will not result in the unrestricted sprawl of Stourport-on-Severn, it will represent the rounding off of the town's north-western boundary.</p> <p><b>2) To prevent neighbouring towns merging into one another</b> There is a considerable green gap between the towns of Stourport-on-Severn and Bewdley which is contained within the Green Belt in order to prevent coalescence. This site is located immediately adjacent to the existing built-up area of Stourport-on-Severn and is clearly separated from Bewdley by an extent of agricultural land. The site would not extend the building line of Stourport-on-Severn closer to Bewdley due to the existing adjacent development at Kingsway.</p> <p>Therefore, the release of this site will not result in the merging of any neighbouring towns.</p> <p><b>3) To assist in safeguarding the countryside from encroachment</b> The creation of strong, defensible boundaries is important in protecting the countryside from encroachment. While it is acknowledged that in theory the release of any land from the Green Belt could result in encroachment, it is considered that the site offers the opportunity to provide strong and defensible boundaries which will protect the countryside and maintain the visual</p>			

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								<p>separation between Stourport-on-Severn and Bewdley.</p> <p>The release of this site from the Green Belt will not compromise the purpose of safeguarding the countryside from encroachment.</p> <p><b>4) To preserve the setting and special character of historic towns</b> Whilst Stourport-on-Severn is a historic canal town and contains two Conservation Areas and associated Listed Buildings, these are not located within close proximity of the site and as such the site does not make a significant contribution to fulfilling this purpose of the Green Belt.</p> <p>The release of this site from the Green Belt will not compromise the setting or special character of any heritage asset.</p> <p><b>5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</b> The release of this land from the Green Belt would not prevent the recycling of derelict and other urban land. The previous Core Strategy and Site Allocations and Policies Local Plan allocated a significant amount of brownfield land for redevelopment however the supply of suitable brownfield land is now reducing. Therefore, the Local Plan Review has decided to undertake a Green Belt Study in order to meet its housing needs. The development of the site can be appropriately phased within the housing trajectory to take account of the availability and deliverability of brownfield sites across the District.</p> <p>The release of the site from the Green Belt will not prejudice the recycling of derelict and other urban land.</p>			

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								<p><b>Green Belt Summary</b> In light of the above, Taylor Wimpey assert that the site makes a 'limited contribution' to Green Belt purposes, rather than a 'contribution' as stated within the Green Belt Review. 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> <p>It has been demonstrated that the release of the site from the Green Belt would not compromise the five purposes of Green Belt land and is entirely in accordance with national policy regarding the release of land from the Green Belt. The site is well contained within strong, defensible boundaries and will minimise encroachment into the countryside while maintaining the clear visual separation between Stourport-on-Severn and Bewdley. It would not compromise the setting of the town and would not prejudice the recycling of derelict and other urban land. Therefore, it is considered that the site represents appropriate Green Belt release to deliver residential development in a sustainable location.</p> <p><b>Landscape Sensitivity</b> The western edge of Stourport-on-Severn comprises several residential estates which, adjacent to the site, are relatively exposed. As a consequence, the settlement edge is currently characterised by late twentieth century, modern residential development with little vegetation for screening. To the west and north, and partly to the east, the landform continues to rise and effectively contains this edge of the settlement from the wider landscape. To the south and south-west, as the landform falls towards the valley of the River Severn, woodland and built form (residential and</p>			

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								<p>commercial units/nurseries) partly encloses the site. The site currently forms part of the Green Belt.</p> <p>The potential development capacity of the site is influenced strongly by the landform as it rises to the north-eastern edge of the site. Also, the treatment of the western boundary is an important consideration as this will define how the settlement edge forms a transition to the wider landscape (and robust edge to the Green Belt) further to the west.</p> <p>In general, there is scope for a development envelope which backs onto existing residential estates, however internally within this, good practice in urban design should aim to break down massing of built form, promote green infrastructure connections through the development envelope. Proposals will also include an extensive area of green infrastructure and public open space located on the western edge of the site to create a robust edge to the settlement and a strong definition to the Green Belt. Green infrastructure and open space is proposed along the frontage of the site to the highway; this has the opportunity to provide functions for open space incorporating linear SuDS and also providing sufficient landscape space for green infrastructure which will facilitate an appropriate transition between the wider landscape and the urban edge.</p> <p><b>Accessibility to Amenities</b> Stourport-on-Severn is a sustainable town and benefits from a wide range of services and facilities as would be expected in a town. The site itself is well- related to the town and has good access to the town centre via Bewdley Road.</p> <p>The majority of town's services are located</p>			

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								<p>in the town centre and include supermarkets, shops, restaurants, pubs and number of recreation uses associated with the river, notably Treasure Island. There are a number of local facilities and services, including local shops, public houses, pharmacy and a doctor's surgery located within 2km walking distance of the site. There are two primary schools located within 1 mile of the site (Lickhill Primary School and Burlish Park Primary School) with Stourport-on-Severn High School located approximately 1.5 miles from the site.</p> <p>The site is also well related to the other towns in the District with Bewdley easily accessible via Bewdley Road and Kidderminster via the A451.</p> <p><b>Highways and Transportation</b> Bewdley Road North is approximately 6.6m and is subject to a 30mph speed limit, although it is noted that a 30mph/60mph interchange is situated along the frontage of the site with the carriageway. There is a single footpath, approximately 1.5m wide, located along the site frontage with Bewdley Road North. Street lighting is provided upon entrance to the residential area of the town and the path increases in width to 2.4m wide. There may be opportunities for road and path widening works as part of any future development.</p> <p>It is proposed that the access would take the form of a T-junction with a right- turn lane. The existing highway network has good visibility and with widening the road can be made a suitable width to accommodate a right-turn lane. Although not the preferred option, it is also possible that a roundabout junction could be used to access the site. It is likely to be desirable to relocate the existing speed gateway to the</p>			

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								<p>north edge of the development area however any access would be based on existing speed limits. Emergency access could be delivered on Bewdley Road North segregated from the main access junction. The existing footway on Bewdley Road North may be widened to enhance pedestrian linkages.</p> <p>Public transport services are located in close proximity of the site. Bus service 16 provides a regular bus service towards Stourport-on-Severn town centre and 294/295 and 15 provide connections to Kidderminster and Worcester. Hartlebury train station is located c. 6.4km south-east of the site and can be accessed via the S15 bus service. The station provides services to a range of destinations including; Kidderminster, Droitwich Spa, Birmingham and Worcester.</p> <p>Various nearby facilities are considered to be within a reasonable walking distance from the site. The site is sustainable in terms of access by walking and cycling to local facilities and accessibility to public transport services.</p> <p>A Transport Assessment will be completed to assess impacts across the wider network, this will include speed survey work. The Transport Assessment will take account of any local committed development sites and any committed highway improvements. Suitable mitigation will be provided as part of the development proposals including any identified off-site highway works and contributions, although there is considered to be sufficient capacity within the local highway network to accommodate the scale of development proposed.</p> <p>In respect of the Burlish Crossing junction, as set out earlier within this Representation</p>			



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								<p>and within the Transport Report previously appended to our Pre- Submission representation, the development of the site would not result in a 'severe' impact upon the junction, as defined within the NPPF.</p> <p><b>Flood Risk and Drainage</b> The development site lies in Flood Zone 1 and is therefore sequentially acceptable for development.</p> <p>The surface water flooding maps show large accumulations of surface water within the site, close to the frontage with Bewdley Road North. The majority of these are 'low risk' with small areas of medium and high risk situated with the site, close to the carriageway. Issues associated with surface water flooding can be dealt with as part of a site-specific Flood Risk Assessment and may require suitable actions such as cut off ditches and French drains.</p> <p>The geology maps for this location show superficial deposits of sand and gravel and bedrock geology of sandstone therefore it is likely that the ground will soak. it is envisaged that onsite attenuation would be provided and if soakage rates are good, individual dwellings will be provided with soakage with soakage provided for the road either through swales and soakaways or an attenuation basin. Further work would be required to establish the best form of attenuation for the site.</p> <p>It is envisaged that foul flows from the development would require pumping to sewers located to the east and in Bewdley Road North.</p> <p><b>Noise</b> The western boundary of the site lies adjacent to the carriageway edge of Bewdley Road North. The site is bounded by</p>			

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								<p>fields to the north and east, and to the south there are existing residential properties off Loweswater Road and Burlish Crossing. It is anticipated that any dwellings along the western boundary would need to face the road in order to protect rear gardens and some additional glazing specification may be required to protect internal amenity. It is unlikely noise will have a significant adverse impact on the development of this site.</p> <p><b>Ground Conditions</b> The British Geological Map for the area indicates the site is underlain by Holt Heath Sand and Gravel (River Terrace Deposits) over Kidderminster Formation (Former Bunter Pebble Beds).</p> <p>An initial Phase I Environmental Risk Assessment for the site has been undertaken which identifies that it is unlikely that the site would be classified as contaminated land.</p> <p><b>Utilities</b> An 850mm Aqueduct runs within the western side of the site, with a 350mm main and disused main running parallel to the aqueduct. 6m easements are required for the mains and the aqueduct, it is also likely that diversion/lowering of this apparatus will be required to facilitate proposed access road. A 250mm mains run along the eastern boundary with a 300mm main running along the northern boundary of the site. A 3m easement is likely to be required for the 250mm main. A 6" and 7" water main are located along the western verge of Bewdley Road North with further clean water mains located to the east and south of the site.</p> <p>There is an existing 11kV HV underground cable which runs along the northern</p>			

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								<p>boundary of site; it is unlikely this cable will need to be diverted. HV underground cables are also situated within the eastern footway of Bewdley Road North, this cable will require diversion to facilitate the proposed site access. Further HV and LV apparatus can be found within the residential streets to the east and south of the site.</p> <p>A BT underground cable is located within the footway of Bewdley Road North which will require diversion/lowering to facilitate the proposed site access.</p> <p>A Medium Pressure (MP) gas main is located along the eastern side of Bewdley Road North. It is likely that sections of this main will require lowering to facilitate the proposed site access.</p> <p>Capacity and connection points need to be determined. Any costs required to upgrade the network or provide suitable reinforcements will be met by the developer.</p> <p><b>Agricultural Land Classification</b> Natural England's Land Classification Map for the West Midlands Region (ALC004) shows that the site comprises of Grade 3 'Good to Moderate Quality Agricultural Land'. It should be noted that the majority of land around Stourport-on-Severn is Grade 3, Grade 2 and in places Grade 1 agricultural land.</p> <p><b>Suitability</b> The information set out above, read in conjunction with the appended technical reports, demonstrate that land at Bewdley Road North is a suitable site for residential development.</p> <p><b>Deliverability</b></p>			

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								<p>There is an agreement in place between the landowner and Taylor Wimpey to facilitate the development of the site.</p> <p>A considerable amount of technical work has been undertaken to consider deliverability of this site. Taylor Wimpey can confirm that this work demonstrates that there are no constraints likely to render the site undeliverable in the Plan period. The site is available now.</p> <p>There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the potential impacts of the development of the site can be mitigated through design and in many cases a positive outcome can be achieved, such as the strengthening of Kidderminster's eastern boundary through landscaping.</p> <p>The site is deliverable and immediately available and, subject to allocation and removal from the Green Belt, could deliver homes and associated community benefits within the next 5-10 years.</p> <p><b>CONCLUSION</b> Taylor Wimpey UK Ltd is in control of land at Bewdley Road North, Stourport-on- Severn. This land is identified as a Housing Site (ref: LI/5 'Burlish Crossing') within the draft Local Plan Review evidence base.</p> <p>The site is sustainably located adjacent to the settlement of Stourport-on-Severn which is identified as a large town and is to provide a supporting role for Kidderminster in delivering large scale housing provision within the District. This site is suitable, developable and available, subject to its release from the Green Belt. The development of the site would constitute</p>			

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								<p>sustainable development.</p> <p>The suitability of the site recognised through the Council's own evidence base, scoring well within both the Green Belt Review and Sustainability Assessment. However, the site is discounted within the Sites Selection Paper due to the perceived capacity of the Burlish Crossing junction. Evidence has previously been presented by Pegasus Group, on behalf of Taylor Wimpey, that the development of the site is not considered to have a 'severe' impact upon the junction, as defined within the NPPF.</p> <p>The site is deliverable and, subject to allocation, could deliver homes and associated community benefits within the next 5-10 years.</p> <p>In our previous representation, concern was raised regarding the Government's stated intention to revert to the 2014 Sub-National Household Projections (SNHP) from the 2016 SNHP when determining housing need. It is therefore encouraging to see that, at Policy AM6A and Paragraph AM6.5 of the Amendments to the Pre- Submission Publication Document, the Council continues to commit to utilising the 2016 SNHP, resulting in a (minimum) housing requirement of 5,520 homes (276 per annum). This is justified on grounds that the Council wishes to be ambitious with its housing requirement figure in order to support economic growth and affordable housing delivery. This approach is supported by Taylor Wimpey and facilitated by Planning Practice Guidance.</p> <p>Nevertheless, it remains that the 29ha employment land requirement does not appear to take into account what could be needed in the event of Wyre Forest seeing stronger economic growth linked to the</p>			

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								<p>aspirations of the Local Enterprise Partnerships in which the District lies. It is unlikely that Wyre Forest District will make much of a contribution to identified growth targets 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>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>			
Taylor Wimpey West Midlands	<a href="#">ALPPS226</a>	Policy AM33 - Part C Proposed Allocations	Comment					<p>This representation relates to land at Bewdley Road North, Stourport-on-Severn, which is within the control of Taylor Wimpey. This land is identified throughout the Local Plan Review evidence base as Site ref: LI/5 'Land at Burlish Crossing, Bewdley Road North'.</p> <p>Policy AM33 identifies an amended list of site allocations to Stourport-on-Severn.</p> <p>As per the previous consultation, it remains that Land at Bewdley Road North (Site Ref: LI/5) is not allocated for development.</p> <p>As per our previous representation, it is submitted that the site represents a suitable and deliverable site for residential development, subject to its release from the Green Belt. It is contented that it remains appropriate to allocate this site for development through the Local Plan Review.</p> <p>Further information in this regard is provided in Chapter 4 of this Representation.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
Barbara Trickett	<a href="#">ALPPS203</a>	AM33.10	Support	Yes	Yes	Yes		I feel strongly that the omission of AKR-18 Land at Yew Tree Walk is the correct course		No	

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								of action based on the comments and information given in the 2019 version of the Local District Plan.			
Paul & Jane Stevenson	<a href="#">ALPPS174</a>	AM33.10	Support	Yes	Yes	Yes		No comments made.		No	
Peter Moore	<a href="#">ALPPS206</a>	AM33.10	Support	Yes	Yes	Yes		I feel strongly that the omission of AKR-18 Land at Yew Tree Walk is the correct course of action based on the comments and information given in the 2019 version of the Local District Plan.		No	
Ian Redfern	<a href="#">ALPPS43</a>	AM33.10	Support	Yes	Yes	Yes		<p>I understand that the Landowner wishes to make representations to the Inspector regarding the omission of AKR/18 Land at Yew Tree Walk.</p> <p>I fully support the Council's decision to remove AKR/18 from the plan as set out in Appendix 6.</p> <p>I also want to ensure that the land off Yew Tree Walk known locally as Patrick's Field is removed from the brownfield site register as it has never been used for gravel extraction and does not meet the current NPPF criteria as a brown field site.</p> <p>I also want the Council to keep the land off Yew Tree Walk as Green Belt as removing it would potentially create a precedent for other land in the Severn Valley Corridor between Stourport on Severn and Bewdley to also be removed. Doing so would be an act of major ecological vandalism.</p>		No	
Peter Trueman	<a href="#">ALPPS48</a>	AM33.6	Support					This relates to the removal of Patrick's Field from the plan as a potential development site. My comment relates to the substantial increase in traffic on the estate if the site was developed. Living near the two primary schools it has been necessary for me to complain to the schools, police and council on a number of occasions about the parking			

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								of vehicles during drop off and pick up times. Those parents etc park vehicles on the footway and grass verges because the road is not wide enough to allow vehicles to pass when cars are parked on both sides of the road. It is often the case that Stagborough Way is completely blocked to cars, and nearly always blocked to larger vehicles such that emergency services would not have access. Increased traffic on Stagborough Way would only make what is currently an extremely difficult and potentially dangerous condition into a much worse situation.			
Hicks	<a href="#">ALPPS57</a>	Policy AM33.6 AKR/18	Support	Yes	Yes	Yes		Removal of land at Yew Tree Walk from Plan. Appendix 6.  Appendix 6 Justification - We agree with the Councils decision		No	
Robert Knott	<a href="#">ALPPS59</a>	Policy AM33.6 AKR/18	Support					Agree with latest submission, which deleted land off Yew Tree Walk, as my comments in Pre-submission consultation 2018, the land should remain designated Green Belt land - if it is not should be put in area as Green Belt land.		No	
Lynda Whiteley	<a href="#">ALPPS61</a>	Policy AM33.6 AKR/18	Support	Yes	Yes	Yes		Land is not appropriate for housing in my opinion due to its construction.		No	
Pauline Belshaw	<a href="#">ALPPS64</a>	Policy AM33.6 AKR/18	Support	Yes	Yes	Yes		Support the removal from the plan of land near Yew Tree Walk, Stourport.		No	
Worcestershire Wildlife Trust Steven Bloomfield	<a href="#">ALPPS101</a>	Policy 33.6	Comment	Yes	Yes	Yes		We are pleased to support the removal of site AKR/18 Yew Tree Walk for the reasons set out in our previous submission.			
Bruce Garner	<a href="#">ALPPS105</a>	Policy AM33.6 AKR/18	Support	Yes	Yes	Yes		I feel strongly that the omission of AKR-18 at Yew Tree Walk is the correct course of action based on the comments and information given in the 2019 version of the Local District Plan.		No	
Dixon & Janice	<a href="#">ALPPS18</a>	Policy	Support	Yes	Yes	Yes		Appendix 6 (Site Selection			

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Sheppard		AM33.6						<p>Paper) justifications for Key site amendments in Pre-Submission Local Plan (2019). Land off Yew Tree Walk (AKR/18) - justification for removal from Pre-Submission Local Plan.</p> <p>Keen to see the land protected as open space and nature area and as an extension to the existing Wyre Forest Nature Reserve. The Conservation Officer has commented on the adverse impact of development on this site.</p>			
Vera Redfern	<a href="#">ALPPS42</a>	Policy AM33.6 Yew Tree Walk, AKR/18	Support	Yes	Yes	Yes		<p>I understand that the Landowner wishes to make representations to the Inspector regarding the omission of AKR/18 Land at Yew Tree Walk.</p> <p>I fully support the council's decision to remove AKR/18 from the plan as set out in appendix 6.</p> <p>I also want to ensure that the land off Yew Tree Walk know locally as Patrick's Field is removed from the brown field site register as it has never been used for gravel extraction and does not meet the current NPPF criteria as a brown field site.</p> <p>I also want the council to keep the land of Yew Tree Walk as Green Belt as removing it would potentially create a precedent for other land in the Severn Valley Corridor between Stourport on Severn and Bewdley to also be removed which would be an act of major ecological vandalism.</p>		No	
Kenneth Wood	<a href="#">ALPPS44</a>	Policy AM33.6 Yew Tree Walk AKR/18	Support	Yes	Yes	Yes		<p>We agree with this action Re: AKR/18- Appendix 6. Justification for site amendments in the pre-submission plan (July 2019) Land off Yew Tree Walk.</p> <p>1) Severe traffic congestion, 2 schools (primary) in area-traffic now even worse.</p> <p>2) Site does not fit with latest guidelines as</p>		No	

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								<p>previously developed land.</p> <p>3) Field formed by ash, subject to flooding-contamination issues.</p> <p>4) Network of badger sites and many protected tree species- part of wildlife corridor</p>			
<p>Friends of Patrick's Field (Shuttles)</p> <p>John Shuttles</p>	<a href="#">ALPPS50</a>	Policy AM33.6 AM33.10	Support	Yes	Yes	Yes		<p>We feel strongly that the omission of AKR/18 Land at Yew Tree Walk is the correct course of action based on the comments and information given to the 2018 version of the Local District Plan.</p> <p>In our 2018 comments the Friends of Patrick's Field stated that we felt that we had inadequate time to obtain full and final information on some of the matters addressed. The purpose of this submission is to provide further information to add to the relevant sections of our earlier submission.</p> <p>The attached documents are key to those parts of our 2018 submission applicable and annotated to correspond with them.</p>		Yes	We understand that the Landowner wishes to make representations to the Inspector regarding the omission of AKR/18 Land at Yew Tree Walk. We wish to have the opportunity to respond to the content of the representation if it is made.
Margaret Ward	<a href="#">ALPPS58</a>	Policy AM33.6 AKR/18	Support	Yes	Yes	Yes		No comments submitted.		No	
Barbara Knott	<a href="#">ALPPS60</a>	Policy AM33.6 AKR/18	Support					I agree with the latest submission which has removed the land off Yew Tree Walk, Stourport, from the plan. As my comments in the pre-submission plan consultation 2018. This land should remain Green Belt to benefit the environment. If it is not already Green Belt it should be designated as such.		No	
Jeffrey Martin	<a href="#">ALPPS63</a>	Policy AM33.6 AKR/18	Support	Yes	Yes	Yes		Grateful that planners have acknowledged the information they have been given and removed the Yew Tree Walk scheme (AKR/18 Appendix 6) from the plan.			
Graham Ashmore (OBE)	<a href="#">ALPPS77</a>	Policy AM33.6 AKR/18	Support	Yes	Yes	Yes		I fully support the justification for the removal of the land off Yew Tree Walk Stourport from the list of sites suitable for	With the amendments made following the 2018 consultation I believe the revised plan is sound.		

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								housing development. I concur with all of the points made in Appendix 6 and would stress that, as this land would be so difficult to develop because of its lack of stability, the losses to wildlife and the views from the Severn Valley would far outweigh any limited gains.  I believe the council has worked very properly and democratically in revising the plan			
Michael Williams	<a href="#">ALPPS104</a>	Policy AM33.6 AKR/18	Support	Yes	Yes	Yes		I support the amendments made to the plan as set out in appendix 6 of the site selection paper (August 2019)  I welcome the removal of land off Yew Tree Walk from the plan. This is an important piece of Green Belt land which forms part of an important wildlife corridor above the river Severn. Further wildlife surveys during the course of 2019 have identified other plants, insects and other animals which are of local and in the case of tower mustard, of national importance. It would be an act of vandalism and totally irresponsible for this site to be destroyed, it is important for its value to be fully recognised both to the community and as a wildlife haven and for the local authority to work towards its designation as a local nature reserve.		No	
Brian Hicks	<a href="#">ALPPS132</a>	Policy AM33.6	Support	Yes	Yes	Yes		I feel strongly that the omission of AKR/18 Land at Yew Tree Walk is the correct course of action based on the comments and information given in the 2019 version of the Local District Plan.		No	
Raymond Mountford	<a href="#">ALPPS158</a>	Policy AM33.6	Support	Yes	Yes	Yes		No comments submitted.		No	
Norbert Wysocki	<a href="#">ALPPS162</a>	Policy AM33.6	Support	Yes	Yes	Yes	Justified	No comments made.		No	
Yew Tree Walk	<a href="#">ALPPS210</a>	Policy	Object	No	No		Positively	Please refer to the attached representations	The site AKR/18 at Yew Tree Walk	Yes	The attached

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Ltd		AM33.6 Yew Tree Walk AKR/18					Prepared Justified Consistent with National Policy	<p>but, in particular, the site at Yew Tree Walk is previously developed land and should, therefore, be allocated (Policy AKR/18 paragraphs 4 and 5) and that the Plan is considered unsound being in conflict with the environmental assessment of Plans and Programmes Regulations 2004, in particular, the failure to consider reasonable alternatives, consultation and that it is unlawful for a decision maker to act under a material mistake of fact (paragraphs 18 to 24 and 33 to 36).</p> <p>The Council held a Call for Sites. As a result, the Site was included in the Council's Housing and Economic Land Availability Assessment 2016 (Reference Number AKR/18):</p> <p>This scrub/and site lies to the south of a housing estate and was previously used to store arising from the old power station. It is therefore deemed to be previously developed land. The entire site is in the Green Belt. The Moorhall Marsh LNR abuts the eastern end of the site. A TPO (2013) covers 18% of the site -2 areas of mixed woodland at Western and eastern ends. 25% of the site is in flood zone 3. Together, these constraints limit the developable area. Access along Moorhall Lane to the south is impossible in times of flood and all access would need to be through the adjacent housing estate which may potentially limit site capacity.</p> <p>In December 2017, the Site was included on the Council's Register of Brownfield Sites, and remains on the Register.</p> <p>The Council accepted that the Site was Previously Developed Land ("PDL") according to the definition in the Framework and that it was suitable for residential development. In October 2018,</p>	<p>Stourport-on-Severn is not currently identified as a preferred allocation in the Local Plan preferred options document.</p> <p>The Plan, it is submitted, would be considered sound if site AKR/18 was to be allocated (see attached representations), in particular, paragraph 42.</p>		<p>representations clearly confirm that site AKR/18 at Yew Tree Walk Stourport-on-Severn is previously developed land and, therefore, we are challenging the site allocations in and around Stourport-on-Severn and we also consider that the Local Planning Authority's sustainability appraisal process is fundamentally flawed because of non-consideration of reasonable alternatives, consultation and that the Local Planning Authority are acting under a material mistake of fact.</p>

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								<p>in the Council's pre-submission draft Local Plan, the Site was allocated Policy AKR/18. The supporting text to the draft policy accepted that the Site was PDL by reference to historic evidence of sand and gravel extraction and subsequent waste tipping. It stated with our emphasis added:</p> <p><i>33.10 This area of land to the rear of Stagborough Way estate was used to tip waste from the former power station. It is on a raised plateau with steeply wooded slopes to the River Severn floodplain below. The Moorhall Nature Reserve is located immediately to the south-east. It is currently in the Green Belt.</i></p> <p><i>33.11 This site was previously subject to sand and gravel extraction in the 1950s before it was in filled with ash waste material from the power station. Although currently in the Green Belt, the site plays a limited role in fulfilling the Green Belt purposes. The site must be designed to integrate well with the neighbouring development and take care with massing and building heights so as not to dominate views across the valley.</i></p> <p>It is also noted that it is confirmed (significantly) that the site plays a limited role in fulfilling Green Belt purposes.</p> <p>On 22 May 2019, the Council sent an email to us asking to justify the inclusion of the Site on the Brownfield Land Register and its classification as PDL. The email stated:</p> <p><i>Following the site being included as a potential allocation in the 2018 Draft Pre• submission Local Plan, new evidence has come to light from local residents who remember the site before it was tipped to form sports pitches. This new evidence now brings into question the designation of the</i></p>			

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								<p><i>land as previously developed and therefore its inclusion on the Brownfield Land Register.</i></p> <p><i>Under paragraph 17 (2) of the Town and Country Planning (Brownfield Land Register) Regulations 2017 revisions can be made to the BLR where land no longer meets the criteria for inclusion.</i></p> <p><i>As the agent promoting the site at Yew Tree Walk, I am writing to ask you to justify the site's inclusion on the Brownfield Land Register and why you consider the site meets the definition of Previously Developed Land as set out in the NPPF (2019) with evidence to support your position.</i></p> <p>On 28 June 2019, Howes Percival the solicitors acting for Yew Tree Walk Limited emailed the Council asking it to provide all of the evidence that it relied on to suggest that the Site should not perhaps be included in the Register of Brownfield land.</p> <p>The Council did not respond substantively, but instead published the open Cabinet agenda for its meeting on 16 July 2019. Item 7 of the agenda concerned reopening the Local Plan Pre-Submission Publication consultation (the Regulation 19 Consultation). Paragraph 5.35 of the Cabinet report dealt with the Site:</p> <p><i>The site allocation 'Yew Tree Walk, AKR/18' has been removed from the Local Plan as a number of issues came to light since the site was proposed. It has been concluded that the site does not meet the criteria for being on the Brownfield Land Register and should therefore be removed from the Local Plan. This is because there is no evidence that the site was used for the extraction of sand and gravel and there is no evidence to show that it has been previously developed as defined</i></p>			

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								<p><i>by the NPPF. There is also concern over the stability of the land and the practicality of actually building on the site, which would have implications for the deliverability of this site.</i></p> <p>On 12 July 2019, Howes Percival again wrote to the Council to demand that the information that the Council relied on to remove the Site allocation be disclosed to enable comment before the Cabinet meeting. That letter also explained and attached the evidence that the Client relied on i.e. Aerial photos, historic maps, trial holes and trenches, and the Jacobs 2014 report (attached as Appendix 5).</p> <p>On 15 July 2019, the solicitors acting for the Company sent the Council a further 1948 photograph and a 1955 Ordnance Survey map showing the Site together with 2 nearby mineral workings.</p> <p>Having received no substantive replies from the Council Howes Percival regrettably emailed Councillors directly on 16 July 2019. That email stated:</p> <p>Dear Councillors</p> <p><i>We have been forced to write to the Council regarding the unfair and we believe unlawful actions of officers with regards to the proposed removal of a housing site in Stourport from the emerging Local Plan. We have liaised with the legal team, planning policy team and the committee support officers requesting that the evidence we have presented be presented to you as members deciding on this matter and that you be made aware of the fact that officers have failed to offer any evidence to support the sudden U turn and to remove the site</i></p>			

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								<p><i>from the Local Plan.</i></p> <p><i>They have refused to make you aware of the evidence so we are forced to send you this information directly. Please take time to read the attachments as they go to the legality of the Council's actions. The correspondence sets out the issues fully and in a nutshell a site that the Council has accepted as previously developed land is now being removed as a housing allocation from the local plan as a result of what appears to be political pressure and greenfield sites remain in the plan even though both the Council's priority and government priority is to develop brownfield land in preference to green belt sites.</i></p> <p>It is understood that Cabinet debated this item on the Agenda for some six minutes. The item was presented briefly, proposed and seconded, and carried unanimously. There was no discussion regarding the letter sent to the Council. It was merely referred to in passing that the submission had been made which would be considered in due course as part of the consultation exercise. No information was presented by officers to Members to justify the assertion that the Site was not previously developed land or suitable for housing development.</p> <p>On 23 July 2019, the Council disclosed the representations that it relies upon. The covering email stated:</p> <p><i>Representations have been received as part of the Local Plan Pre-submission consultation in November/December 2018 which have led Council officers to conclude that the site no longer meets criteria 4 (b) and 4 (d) of the Brownfield Land Register Regulations and development is no longer considered suitable or</i></p>			



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								<p><i>achievable on the site. Please find attached a redacted version of these representations received.</i></p> <p><i>The Council is reopening the Pre-Submission consultation on 2nd September 2019, for 6 weeks, closing on 14th October 2019. Therefore, your client will have an opportunity to respond to the proposed changes to the Pre-Submission Local Plan when the consultation reopens in September.</i></p> <p>13. The definition of PDL in Annex 2 of the NPPF is as follows:</p> <p><b>Previously developed land:</b> <i>Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.</i></p> <p><i>This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.</i></p> <p>The exclusion in relation to land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures, confirms that land is PDL if it was developed for minerals extraction or</p>			

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								<p>waste disposal by landfill and no provision for restoration was made. The site is clearly PDL.</p> <p>Where land has been developed for minerals extraction or waste disposal by landfill arguably land developed in this way should be treated as PDL the test is whether provision for restoration has been made through development management procedures. That is certainly the approach that inspectors have taken to be similar definition in PPS3: see e.g. Appeal Ref APP/M9565/A/10/2136176, South Ockenden Industrial Estate, Stifford Road, South Ockenden (30 August 2011).</p> <p>The Council has updated its Sustainability Appraisal accompanying the Draft Local Plan. The July 2019 revised document discusses the selection of reasonable alternatives and at p.43 refers obliquely to the decision to exclude allocation of the Site as a reasonable alternative:</p> <p>Changes resulting from the SA of sites include:</p> <ul style="list-style-type: none"> <li>• Revision of some HELAA forms in response to queries raised by the SA, e.g. whether land was Greenfield or Brownfield, ease of access to sites.</li> </ul> <p>The site specific assessment for AKR/18 has been amended to delete the references to sand and gravel extraction it is submitted without evidence. Instead, the assessment treats the Site as having been a sports field on to which ash was tipped (i.e. in line with the third party representations summarised above):</p>			

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								<p><b>Environmental Assessment of Plans</b></p> <p>The Environmental Assessment of Plans and Programmes Regulations 2004 ("the 2004 Regs") require that an environmental report on a Local Plan "shall identify, describe and evaluate the likely significant effects on the environment of (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme": Reg 12(2).</p> <p>The courts have held that the duty is not simply to assess all reasonable alternatives, but also to explain the reasons for selecting the alternatives dealt with. Unless this is done, the reader of the environmental report will be unable to understand the basis for selecting the alternatives and whether the selection was deficient. As Ouseley J explained in <i>Heard v Broadland DC</i> [2012] Env LR 23:</p> <p><i>66. I conclude that, for all the effort put into the preparation of the JCS, consultation and its SA, the need for outline reasons for the selection of the alternatives dealt with at the various stages has not been addressed. No doubt there are some possible alternatives which could be regarded as obvious non-starters by anyone, which could not warrant even an outline reason for being disregarded. The same would be true of those which obviously could not provide what RS required, or which placed development in an area beyond the scope of the plan or the legal competence of the defendants. But that is not the case here on the evidence before me, in</i></p>			

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								<p><i>relation to a non NEG T growth scenario, with or without NDR, and especially with an uncertain NDR. Without the reasons for the earlier selection decisions, it is less easy to see whether the choice of alternatives involves a major deficiency.</i></p> <p>67. <i>I accept that the plan-making process permits the broad options at stage one to be reduced or closed at the next stage, so that a preferred option or group of options emerges; there may then be a variety of narrower options about how they are progressed, and that that too may lead to a chosen course which may have itself further optional forms of implementation. It is not necessary to keep open all options for the same level of detailed examination at all stages. But if what I have adumbrated is the process adopted, an outline of the reasons for the selection of the options to be taken forward for assessment at each of those stages is required, even if that is left to the final SA, which for present purposes is the September 2009 SA.</i></p> <p>68. <i>The reasons for the selection of the preferred option, as distinct from the reasons for the selection of the alternatives to be considered, have not been addressed as such either in the SA, although some comparative material is available.</i></p> <p><i>The parties dispute the need for these reasons. It was very surprising to me that the reason for the selection of the preferred option was not available as part of the pre-submission JCS or the accompanying September SA, nor readily available in a</i></p>			

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								<p><i>public document to which the public could readily be cross-referred, with a summary.</i></p> <p>20. Where a local planning authority has failed properly to consider reasonable alternatives, it will be unlawful for the Secretary of State to recommend adoption of the plan and it will be unlawful for the local planning authority to adopt the plan.</p> <p>Secondly, Article 2(b) of the SEA Directive requires a local planning authority to consult on its environmental report and to take the results of that consultation into account:</p> <p><i>'environmental assessment' shall mean the preparation of an environmental report, the carrying out of consultations, <u>the taking into account of the environmental report and the results of the consultations in decision-making and the provision of information on the decision in accordance with Articles 4 to 9.</u> (Emphasis added)</i></p> <p>The EU Commission has published guidance on the application of the SEA Directive, entitled Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment ("the Commission Guidance").</p> <p><b>In <i>Save Historic Newmarket v Forest Heath DC</i> (2011] JPL 1233, Collins J considered the Commission Guidance to be persuasive as to the interpretation of the SEA Directive and the 2004 Rags. In relation to consultation, the Commission Guidance states:</b></p> <p>This definition clearly states that consultation is an inseparable part of the assessment. Further, the results of the <b>consultation</b> have to be <b>taken into account</b></p>			

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								<p>when the decision is being made. If either element is missing, there is, by definition, no environmental assessment in conformity with the Directive. This underlines the importance that is attached to consultation in the assessment. (Emphasis in original)</p> <p>Thirdly, it is unlawful for a decision-maker to act under a material mistake of fact: see e.g. <b>Eva Secretary of State for the Home Department [2004] QB 1044</b>. In the local plan-making context, the Inspector examining the Stratford on Avon Local Plan sent a letter containing interim conclusions on 18 March 2015 requiring that further sustainability appraisal work be undertaken because the local planning authority had made a factual error that was material in causing one site to be rejected (see paragraph 77 of that letter).</p> <p>Accordingly, the Council's sustainability appraisal must properly assess the reasonable alternative of allocating the Site, the Council must take into account consultation responses received from the Client in relation to the most recent sustainability appraisal, and the sustainability appraisal must not be based on material factual errors.</p> <p>Statutory Basis for Plan Making</p> <p>Section 19(2) of the Planning and Compulsory Purchase Act 2004 requires that a Council must in preparing a Development Plan have regard to national policies and advice contained in guidance issued by the Secretary of State and comply with their Statement of Community Involvement (19(3)). Furthermore by virtue of Section 20(2) of the Act a Local Planning Authority who intends to submit a Development Plan document to the Secretary of State for independent examination must</p>			

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								<p>not do so unless they have complied with all relevant requirements contained in the Act and that they consider the document is ready for independent examination. To that extent they must be satisfied that the document is sound by virtue of Section 20(5)(b).</p> <p>Furthermore in relation to the 2012 Local Plan Regulations, Regulation 18(3) states clearly that in preparing a Local Plan the LPA must take into account any representations made to them in response to invitations under paragraph (1). This includes residents and business owners.</p> <p>In deciding to delete allocation AKR/18 from the Local Plan the Council did not make our clients aware of the basis for reversing its decision to regard the site as PDL. It did not disclose or invite comment on third party material they were basing their decision on. It gave no or insufficient opportunity to our client to make representations before making its decision. It failed to have any regard to the submissions made on behalf of our client in respect of the PDL status of the land before deleting the site.</p> <p>The Council, as part of this consultation process, is under a clear legal duty to take account of the evidence submitted by our clients in respect of the PDL status of the site and to base its decisions on the evidence presented. Furthermore given that the Council has concluded previously that the site is PDL on the basis that it was tipped with waste ash, and that fact is not disputed, whether by the Council or third parties, it must still be PDL regardless of the history of mineral extraction on the site.</p> <p>Clear evidence has been submitted that the site was previously used for mineral (sand and gravel) extraction. This is borne out by</p>			

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								<p>photographic and map evidence. Sand and gravel workings were clearly common in the local area as shown on maps.</p> <p>In order to tip circa 10m of ash fill to create a level site, there had to be a substantial excavation over the site to accommodate that fill. No other rational explanation has ever been provided as to how the opportunity arose to tip this amount of waste ash on this site or why else the site was chosen for that purpose. Anecdotal third party local evidence provided to a surveying team, also confirmed the historic use.</p> <p>Whilst the Council assert that the site was not used for sand and gravel extraction (and ignores the tipping of ash altogether) it provides no evidence at all to support that assertion. The document entitled "The Friends of Patrick's Field" 15th December 2018 provides no evidence to support the alleged absence of sand and gravel extraction, yet appears to be the sole basis for the Council's decision.</p> <p>Regardless of their statutory duties all Councils have a common law duty to act in a manner which is legal in the sense of not acting perversely or irrationally and that includes making local plans based on assertions that are not backed by evidence and which are actually contrary to the information available.</p> <p>It is clear from the above that the Council is under an obligation to ensure that prior to submission of a development plan document for examination they must be satisfied that what they are submitting to the Secretary of State is sound. Paragraph 31 of the NPPF (2019) is quite clear that the preparation and review of all policies should be underpinned by relevant and up to date</p>			



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								<p>evidence. It is noted that whilst the Council's Cabinet report refers to updated evidence on various issues none of the evidence presented in the Appendices relates in any way to the decision to remove the Yew Tree Walk allocation from the submission version of the Local Plan. Moreover paragraph 32 makes it clear that Local Plan and spatial development strategies should be informed throughout their preparation by sustainability appraisals that meet the relevant legal requirements.</p> <p>We would also draw your attention to paragraphs 117 and 138 of the Framework. Paragraph 17 states "Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed land or "Brownfield" land. Paragraph 138 emphasises that where Green Belt releases are to be made for development " ... plans should give first consideration to land which has been previously developed and/or is well-served by public transport".</p> <p>In assessing whether or not the Council considers their Local Plan to be sound they have to have regard to paragraph 35 of the NPPF specifically sub-paragraph (b) requires that the proposals be justified. The Council's policies including their housing allocations must therefore be the most appropriate strategy taking into account the reasonable alternatives and based on proportionate evidence.</p> <p>In all the circumstances the landowners assert that the Council has failed in its obligations to deal with the preparation of the emerging plan, particularly as it relates to the removal of the Yew Tree Walk allocation, in a way that is sound for the purposes of the requirements of the 2004</p>			

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								<p>Planning and Compulsory Purchase Act. Furthermore the manner in which the proposed allocation has been removed from this version of the Local Plan is wholly unreasonable having had no regard to any credible evidence, nor indeed any attempt to engage in any meaningful consultation with the landowner or to seek the landowner's views before taking actions. That position must be addressed before preparing the submission version of the Local Plan.</p> <p><b>Yew Tree Walk Site</b></p> <p>The site AKR/18 at Yew Tree Walk, Stourport-on-Seven, is not currently identified as a preferred allocation in the Local Plan Preferred Options Document.</p> <p>The majority of the site is unconstrained PDL and the Illustrative Master plan contained within the Promotional Document submitted as part of these representations demonstrates how a suitable residential development can come forward on this site.</p> <p>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 outside of the constrained areas. In light of this change the Council should revisit the sites scoring in the SA and reconsider this site for allocation. Note that this change has no impact upon the capacity of the site.</p> <p>With regards to the suitability of the site, 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</p>			

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								<p>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>Stourport-on-Seven 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. The site at Yew Tree Walk is sustainably located, is PDL and is on the edge of Stourport-on-Seven. 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.</p> <p>Given that development should be targeted towards Kidderminster and Stourport• on-Seven as the principle settlements, Green Belt sites such as Yew Tree Walk which are in sustainable locations, are unconstrained, and particularly those which are PDL, should therefore be identified as suitable residential allocations through the Local Plan Review. It is noted that certain allocated sites references LI/11, WA/BE/3, WA/BEil, and WA/KF/3 as examples, that they are Greenfield sites within the Green Belt, where the thrust of national planning policy is to redevelop Brownfield sites such as Yew Tree Walk.</p>			
Michael Mills	<a href="#">ALPPS114</a>	Policy AM33.6	Support					We appreciate the decision made by the planning team to remove Patricks Field site from the local plan and wish to thank you for listening and taking into account all the objections and reasons put forward by all of us.			
Irene Mountford	<a href="#">ALPPS161</a>	Policy AM33.6	Support	Yes	Yes	Yes		No comments submitted.		No	

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

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Peter Robin	<a href="#">ALPPS181</a>	Policy AM33.6	Support					I fully agree with the council's justification for the removal of the land off Yew Tree Walk from the local plan as stated in the site selection paper as quoted below.  " Appendix 6 justification for the key site amendments in Pre-Submission Local Plan (July 2019) - Land off Yew Tree Walk - AKR/18-justification for removal from Pre-Submission Local Plan".		No	
Sport England Stuart Morgans	<a href="#">ALPPS176</a>	Policy AM33.20.1 Minster Road Outdoor Sports Area	Support					Sport England has previously objected to Policy 33.20 and the associated reasoned justification in para 33.39 relating to Minster Road Outdoor Sports Area, explaining that whilst Sport England welcomes that the policy encourages proposals to further develop outdoor sports facilities at the site, the policy did not sufficiently set out how this will be achieved and did not provide appropriate reference to the Council's Playing Pitch Strategy (PPS) and Built Sports Facilities Strategy (BFS). Modifications were recommended to address this point.  The 2019 pre-submission draft has addressed this point by including additional text to policy AM33.21 and the associated reasoned justification in para AM33.40 to set out that proposals will be delivered via developer contributions and other funding sources in accordance with the PPS and BFS.  Sport England therefore wishes to remove its objection as its concerns have now been addressed.		No	
Susan Wright	<a href="#">ALPPS30</a>	Policy AM33.20 1 Minster Road Outdoor	Comment	Yes	Yes	Yes		The area in question must, I feel, remain green in the truest sense and not be subject to future planning applications for hard standing playing courts, cycle paths, "sports domes" or anything else that would detract		Yes	At this stage there is sufficient information on how this land is going to be used to satisfy myself that the best use of this

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		Sports Areaster Road Outdoor Sports Area						<p>from its "green" status. There are already any number of hard standing sports facilities in the near vicinity without the need for more.</p> <p>Also the location of the car park needs to be carefully considered, or initially taken out of the planning requirements as there is a very substantial car park at the sports centre, which has very little use, other than for parents to drop/pick up their children from the high school.</p> <p>The section of Kingsway where the proposed change of use is planned has a 60mph road speed which should be reduced as part of this project, preferably with traffic calming measures at the crossing point from the sports centre to the netball dome, at several points along the winding road and terminating just prior to entering Burlish Estate (close to Torridon Road).</p>			area and safeguarding of the Green Belt.
Stuart Scott	<a href="#">ALPPS41</a>	AKR/18	Support	Yes	Yes	Yes		<p>I stand by the comments I made in my submission to the Local Plan Consultation of December 2018 regarding AKR/18, Yew Tree Walk and I agree with the Council's decision to remove the site from the Local Plan.</p> <p>I also concur with all the points made by the Friends of Patricks Field in their submission to the Consultation on that subject.</p> <p>I consider their analysis of the inadequacies of the 1987 site survey by Johnson, Poole and Bloomer to be of particular significance.</p> <p>I also note their comments on the Traffic Report which, if anything, I believe are under-stated. In the last 8 years I personally have witnessed numerous examples of reckless driving and inconsiderate parking along Stagborough Way and consider it only a matter of time before a serious incident</p>		No	

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								occurs. There exists in the here and now an urgent need to address these issues which would only be exacerbated by the expansion of the estate by more housing.			
Keith Tindell	<a href="#">ALPPS12</a>	AKR/18	Support					Agree with Appendix 6 Justification for key site amendments in Pre -submission Local Plan (July 2019) -Land off Yew Tree Walk- AKR/18-Justification for the removal from Pre-Submission Local Plan (June 2019)			

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Piper Homes	<a href="#">ALPPS141</a>	Policy AM36	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>This representation is made by RCA Regeneration Ltd on behalf of Piper Homes to the Wyre Forest Local Plan Pre-Submission publication consultation.</p> <p>This is the second submission made to the revised Regulation 19 consultation and should be read alongside the representations made on behalf of Nikki Harrison in December 2018. The land is now under the control of Piper Homes.</p> <p>These representations do not seek to repeat what has already been stated.</p> <p>This representation relates to land north of Plough Lane, Far Forest. Piper Homes are promoting the site for a residential development with supporting infrastructure and green space provision. We note that the Council have found themselves in a position where they must undertake a second pre-submission plan consultation.</p> <p>Piper Homes remain of the view that the land to the north of Plough Lane, Far Forest provides an excellent opportunity to make a proportionate contribution towards meeting local housing needs. The site is sustainably located next to the village shop and bus stop and backing on to the school. Many day to day services therefore can be accessed easily by future residents.</p> <p>As with our previous representation, this document is framed in the context of the requirements for the Local Plan to be legally compliant and sound. The Tests of Soundness are set out in the NPPF at paragraph 35. For a Plan to be sound it must be:</p> <ul style="list-style-type: none"> <li>• Positively Prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</li> <li>• Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</li> <li>• Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</li> <li>• Consistent with National Policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.</li> </ul> <p>Further to our previous representations, the Council appear to have missed a</p>	To include site of land to the north of Plough Lane, Fare Forest into the pre submission plan.	Yes	The matters we have raised in our representations to date are largely technical and go to the heart of the spatial strategy being promoted by the Council. We therefore wish to take an active part at the EIP in order to ensure the Inspector is clear on our submissions.

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								<p>significant opportunity to engage with their neighbouring Black Country Authorities and that of the Greater Birmingham conurbation.</p> <p>The Council claim that maintaining an annualised requirement of 276 (as opposed to all they had to do at 248) is 'ambitious'. As this merely translates to an extra 28 homes per annum, we disagree with this sentiment. As a result, we completely agree that the 276 figure must be a minimum and must therefore not be treated as a ceiling or cap during the decision- taking process, as this would be at odds with the needs to significantly boost the supply of housing in the District. In reality, given the amount of sustainably located non-Green Belt land in the district would still leave this Council in a restricted position in future. Our views on the continued lack of Reserve Sites/Areas of Development Restraint are considered later in this document.</p> <p>We previously identified that the Council are seeking growth in highly skilled new jobs and significant infrastructure improvements, but very little in the way of evidence to support how this might happen, in reality. Indeed, the Infrastructure Delivery Plan (IDP) identifies a considerable shortfall of £77.3m million over the course of the plan period, with no convincing evidence or proper plan as to how this shortfall would be addressed.</p> <p>This is a significant over-reliance on infrastructure funding that could put the delivery of the plan as it stands in jeopardy, but the risk assessment associated with this is non-existent.</p> <p>Adding to this risk is the dependency on brownfield sites – we are well aware that many of these sites (all formerly allocated or with lapsed permissions) have viability issues, providing substantially reduced affordable housing or only being viable with substantial grant funding. Examples of these in the District include:</p> <ul style="list-style-type: none"> <li>• Former Carpets of Worth site, Stourport (AKR-20) (c. 159 dwellings), which has been acquired by Aldi for a foodstore, reducing the capacity for residential development;</li> <li>• Former middle school at Sion Hill, Kidderminster (WFR-WC-18) (c.58 dwellings) which is being grant funded;</li> <li>• Former Victoria Carpets sports ground, Kidderminster (AS-5) (c. 48 dwellings) which is being grant funded;</li> <li>• Former British Sugar site in Kidderminster has also not delivered the level of affordable</li> </ul> <p>housing required, due to viability issues, with the latest planning permission for Parcel P (58 dwellings) including just 7 affordable dwellings, and</p>			



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								<ul style="list-style-type: none"> <li>The Taylor Wimpey proposals for 106 dwellings at Steatite Road, Stourport (MI-6) are providing just 14% affordable housing, because of viability issues associated with contaminated land.</li> </ul> <p>The Public benefits from these developments, such as education contributions, open space contributions and contributions toward public transport cannot be grant funded by Homes England and are also often significantly reduced.</p> <p>This is compounded by the infrastructure funding shortfall, which we identified earlier.</p> <p>We note the Council's heavy reliance on housing supply from brownfield sites (where they state some 49% of all allocations are brownfield – at AM 6.31). This is of concern, as these sites generally deliver far fewer public benefits and are dogged with delays and viability problems. As a result, they will fail to meet the 'homes for all' criteria, set out in the Sustainability Appraisal, against which all sites have been assessed.</p> <p>We consider that choosing the right sites in the right locations, with less of an infrastructure burden could have gone some way towards addressing some of these infrastructure needs.</p> <p>The updated Sustainability Appraisal (non-Technical Summary) states that the expansion of Lea Castle to 1400 'would allow the site to become a stand-alone community with a school and other services'. Our comments on the relative sustainability of this approach is set out later in this report, but in essence, and notwithstanding our transportation; landscape and Green Belt concerns, we consider this to be far too small for a sustainable stand-alone settlement that neither corresponds to the boundaries of Kidderminster or the village of Cookley.</p> <p>We disagree with the notion that only 25% affordable housing (because of limited viability) should be delivered within major housing sites. We consider that the viability of green field land in the District would (and should) be able to deliver more. The land to the north of Plough Lane could deliver a greater proportion of affordable housing, and this could positively contribute to the supply of affordable housing, which is a major issue affecting the District. We cannot understand why the Council persist in pursuing a strategy of under-delivering affordable housing on previously developed sites that have viability problems, together with a suppressed requirement for affordable housing on green field sites.</p> <p>As previously stated, we do not consider this plan is positively prepared, and</p>			

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								<p>it is contrary to paragraph 16 (b) of the Framework, which seeks plans that are 'aspirational but deliverable'. This plan is neither of those things.</p> <p>We consider in this section the Evidence Base which underpins the strategy of the Council, leading to a conclusion about whether the emerging Presubmission Local Plan is justified.</p> <p>The proposed revised trajectory for the delivery of housing (Picture AM37.1) as we have already pointed out, has, we consider a significant amount of optimism bias within it and this, if anything has worsened. From 2020-2023, it appears the Council have assumed that delivery rates will more than treble from what they are currently achieving.</p> <p>These delivery rates assumed by the Council require even more of a significant step-change. Given the dependency on brownfield sites, all of which require significant preliminary works and some form of intervention, we fail to see how the Council can legitimately claim that such delivery rates can be achieved.</p> <p>We maintain, therefore, that the assumed delivery rates for market and affordable housing with the District are neither robust nor credible. We have already been at great pains to put forward our views on how the plan deals with the worsening affordability crisis. This Council's insistence that so many of their long standing brownfield sites are once again trotted out as housing allocations demonstrates their lack of commitment to the delivery of affordable housing in the District. These sites will not deliver the level of affordable housing the District requires.</p> <p>We have already stated that Policy 8B (Affordable Housing Provision) only proposes a minimum annual average of 90 affordable dwellings per annum which is 43% lower than the 158 net annual need identified by The Housing Needs Study (2018). Over the plan period this would equate to a 1,360 shortfall in affordable housing provision therefore further worsening the housing crisis.</p> <p>The opportunities presented by sites in the rural settlements of Wyre Forest, including the land to the north of Plough Lane, Far Forest would offer market and affordable housing and other public benefits desperately required by the District. Seeking to allocate 49% of the housing requirement on brown field sites that have consistently struggled to come forward over years, and in some cases decades, will put the plan at serious risk of failure.</p> <p>We have set out some examples of sites where we consider that delivery has been an issue, demonstrating that the delivery of the strategy is at risk. The</p>			

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								<p>Council have insisted that they do not need Reserve Sites, with just a 130 dwelling yield from the small number of reserve sites still included in the plan, this represents just 2% of the total requirement. This does not provide anywhere near the level of flexibility required, in the event, for instance that affordability continues to worsen and the market shows no sign of stabilising.</p> <p>This policy approach is contrary to NPPF as the plan is not positively prepared or effective and therefore fails the tests of soundness. As we have highlighted, the lack of reserve housing sites (bar a very small number of sites totalling 130 dwellings and representing just 2% of the total proposed housing allocations), is of particular concern.</p> <p>The Framework is clear at paragraph 11 (a) that: ‘plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change’</p> <p>There is no flexibility within this plan concerning the delivery of housing. Given the constraints of the District in terms of Green Belt and the lack of viable brownfield sites that can deliver much needed public benefits, the use of a minimum housing target will simply result in a default cap on delivery. We therefore consider the use of a far greater number of Reserve Sites to be vital in addressing the requirements of the Framework, or the plan will not be consistent with the relevant parts of the Framework. Piper Homes remain of the view that the land to the north of Plough Lane, Far Forest provides an excellent opportunity to make a proportionate contribution towards meeting local housing needs. The site is sustainably located next to the village shop and bus stop and backing on to the school. Many day to day services therefore can be accessed easily by future residents.</p> <p>The Council claim that maintaining an annualised requirement of 276 (as opposed to all they had to do at 248) is ‘ambitious’. As this merely translates to an extra 28 homes per annum, we disagree with this sentiment. As a result, we completely agree that the 276 figure <u>must</u> be a minimum and must therefore <u>not</u> be treated as a ceiling or cap during the decision- taking process, as this would be at odds with the needs to significantly boost the supply of housing in the District. In reality, given the amount of sustainably located non-Green Belt land in the district would still leave this Council in a restricted position in future. Our views on the continued lack of Reserve Sites/Areas of Development Restraint are considered later in this document.</p> <p>We disagree with the notion that only 25% affordable housing (because of limited viability) should be delivered within major housing sites. We consider that the viability of green field land in the District would (and should) be able to deliver more. The land to the north of Plough Lane could deliver a greater</p>			

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								<p>proportion of affordable housing</p> <p>As we have highlighted, the lack of reserve housing sites (bar a very small number of sites totalling 130 dwellings and representing just 2% of the total proposed housing allocations), is of particular concern.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS239</a>	AM36	Comment					<p>This representation relates to land at Belbroughton Road, Blakedown, which is within the control of Taylor Wimpey. This land has not previously been promoted through the Local Plan Review process. A small section (approximately 1ha) of the site is included within the Rural East HELAA (August 2019) as Site Ref: WFR/CB/4 'Land Adjacent to 77 Belbroughton Road'.</p> <p>Policy AM33 identifies an amended list of site allocations, including Land off Station Drive, Blakedown (Site Ref: WFR/CB/3) for approximately 50 dwellings, in conjunction with the provision of additional parking to serve Blakedown Station.</p> <p>As set out above, the recognition that Blakedown constitutes a sustainable location for development is supported. Again, it is reiterated that the sustainability credentials of Blakedown warrant the allocation of additional homes beyond those identified as meeting local needs.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.</p>
V Clinton	<a href="#">ALPPS143</a>	Policy AM36	Object	No	No	No	Positively Prepared Justified Effective Consistent with	<p>See attached representations.</p> <p>Points included in attached representations include.</p>	To include site land at the former Blakedown Nurseries Site, Hackmans Gate in the	Yes	The matters we have raised in our representati

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							National Policy	<p>This representation relates to <b>land at the former Blakedown Nurseries site, Hackmans Gate, near Blakedown</b>. Promoting the site for a residential development. Interested in a market scheme or a wholly affordable scheme as a rural exception site.</p> <p>The site was formerly used a B8 distribution centre by the plant nursery, prior to its closure.</p> <p>The site will be subject to planning applications on the site for a small market scheme and a larger rural exception scheme.</p> <p>The land at the former Blakedown Nurseries site is deliverable, with minimal infrastructure required to make it deliverable. As such, it would out-perform a number of the brownfield sites within the town centres. We consider that the site could deliver within the first 5 years of the plan.</p> <p><b>The land at the former Blakedown Nurseries site could deliver a market or a 100% affordable housing scheme and invite its allocation. This would make a substantial contribution to rural affordable housing or market housing supply in what is a very constrained area. Furthermore, the provision of bungalows on the site could address the needs of older people or those with limited mobility.</b></p> <p>If developed for housing, the only infrastructure requirement associated with the land at the former Blakedown Nurseries site would be a pedestrian link to be provided to the Hackmans Gate crossing, where there is ample space along the highway verge that could be delivered as part of a S278 or S106 in order to ensure pedestrian connectivity with the village.</p> <p>The site is very well contained within the landscape and its development would not offend the visual element to the Green Belt in this location. It would be heavily screened by existing landscape vegetation along Hackman's Gate Lane. The site is already in part covered by a large glasshouse, associated with the previous B8 operation.</p> <p>The site provides an excellent opportunity to create a modest addition to the village of Blakedown within walking distance of a number of services and facilities, including the school, railway station, shops and pubs. Medical facilities and education establishments are also available within a short distance of the site being located in Belbroughton and Hagley.</p> <p>The site was formerly used a B8 distribution centre by the plant nursery, prior to its closure.</p>	Pre Submission Plan.		ons to date are largely technical and go to the heart of the spatial strategy being promoted by the Council. We therefore wish to take an active part in the EiP in order to ensure the Inspector is clear on our submissions.

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								<p>The site will be subject to planning applications on the site for a small market scheme and a larger rural exception scheme.</p> <p>The site could offer a proportionate addition of housing, particularly bungalows, to the village in an area with recognised local housing need.</p> <p>This document is framed in the context of the requirements for the Local Plan to be legally compliant and sound. The Tests of Soundness are set out in the NPPF at paragraph 35. For a Plan to be sound it must be:</p> <ul style="list-style-type: none"> <li>• <b>Positively Prepared</b> – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development</li> <li>• <b>Justified</b> – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</li> <li>• <b>Effective</b> – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</li> <li>• <b>Consistent with National Policy</b> – enabling the delivery of sustainable development in accordance with the policies in this Framework.</li> </ul> <p>We consider the Council have missed a significant opportunity to engage with their neighbouring Black Country Authorities and that of the Greater Birmingham conurbation in terms of dealing with undersupply in those areas.</p> <p>The Council claim that maintaining an annualised requirement of 276 (as opposed to all they had to do at 248) is ‘ambitious’. As this merely translates to an extra 28 homes per annum, we disagree with this sentiment. As a result, we completely agree that the 276 figure <u>must</u> be a minimum and must therefore <u>not</u> be treated as a ceiling or cap during the decision- taking process, as this would be at odds with the needs to significantly boost the supply of housing in the District. In reality, given the amount of sustainably located non-Green Belt land in the district, this would still leave the Council</p>			

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								<p>in a restricted position in future. Our views on the continued lack of Reserve Sites/Areas of Development Restraint are considered later in this document.</p> <p>We have noted that the Council are seeking growth in highly skilled new jobs and significant infrastructure improvements, but there is very little in the way of evidence to support how this might happen, in reality. Indeed, the Infrastructure Delivery Plan (IDP) identifies a considerable shortfall of £77.3m million over the course of the plan period, with no convincing evidence or proper plan as to how this shortfall would be addressed.</p> <p>This is a significant over-reliance on infrastructure funding that could put the delivery of the plan as it stands in jeopardy, but the risk assessment associated with this is non-existent.</p> <p>Adding to this risk is the dependency on town centre brownfield sites – we are well aware that many of these sites (all formerly allocated or with lapsed permissions) have viability issues, providing substantially reduced affordable housing or only being viable with substantial grant funding.</p> <p>2 Examples of these in the District include:</p> <ul style="list-style-type: none"> <li>• Former Carpets of Worth site, Stourport (AKR-20) (c. 159 dwellings), which has been acquired by Aldi for a foodstore, reducing the capacity for residential development;</li> <li>• Former middle school at Sion Hill, Kidderminster (WFR-WC-18) (c.58 dwellings) which is being grant funded;</li> <li>• Former Victoria Carpets sports ground, Kidderminster (AS-5) (c. 48 dwellings) which is being grant funded;</li> <li>• Former British Sugar site in Kidderminster has also not delivered the level of affordable</li> </ul> <p>housing required, due to viability issues, with the latest planning permission for Parcel P (58 dwellings) including just 7 affordable dwellings, and</p> <ul style="list-style-type: none"> <li>• The Taylor Wimpey proposals for 106 dwellings at Steatite Road, Stourport (MI-6) are providing just 14% affordable housing, because of viability issues associated with contaminated land.</li> </ul> <p>The public benefits from these developments, such as education contributions, open space contributions and contributions toward public transport cannot be grant funded by Homes England and are also often</p>			

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								<p>significantly reduced. This is compounded by the infrastructure funding shortfall, which we identified earlier.</p> <p>We note the Council’s heavy reliance on housing supply from town centre brownfield sites (where they state some 49% of all allocations are brownfield – at AM 6.31). This is of concern, as these sites generally deliver far fewer public benefits and are dogged with delays and viability problems. We are concerned that the level of housing that would meet the needs of older people, or those with mobility issues has not been properly considered within the emerging plan. As a result, it will fail to meet the ‘homes for all’ criteria, set out in the Sustainability Appraisal, against which all sites have been assessed.</p> <p>We consider that choosing the right sites in the right locations, with less of an infrastructure burden could have gone some way towards addressing some of these infrastructure needs.</p> <p>The land at the former Blakedown Nurseries has the potential to deliver a proportionate market scheme or wholly affordable rural exception scheme which would positively contribute to the supply of affordable housing, which is a major issue affecting the Parish<sup>1</sup> as shown in their Housing Needs Survey of 2010 as well as the wider District. The landowners are flexible in terms of whether the housing could meet the needs of older people, who have been identified as having a specific need within the Parish.</p> <p><b>We do not consider this plan is positively prepared, and it is contrary to paragraph 16 (b) of the Framework, which seeks plans that are ‘aspirational but deliverable’. This plan is neither of those things.</b></p> <p><sup>1</sup> <a href="https://www.wyreforestdc.gov.uk/media/107286/WFDC19-CBP-Housing-Needs-Survey-2010.pdf">https://www.wyreforestdc.gov.uk/media/107286/WFDC19-CBP-Housing-Needs-Survey-2010.pdf</a></p> <p>We consider in this section the Evidence Base which underpins the strategy of the Council,</p> <p>leading to a conclusion about whether the emerging Pre-submission Local Plan is justified. The proposed strategy for the delivery of housing has, we consider, a significant amount of ‘optimism bias’ within it. The delivery rates assumed by the Council require a significant step- change from its previously realised delivery, and given the over-dependency on town centre brownfield sites, all of which require significant preliminary works, we fail to see how the Council can legitimately claim that such delivery rates can be achieved.</p> <p>The land at the former Blakedown Nurseries site is deliverable, with minimal</p>			



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								<p>infrastructure required to make it deliverable. As such, it would out-perform a number of the brownfield sites within the town centres. We consider that the site could deliver within the first 5 years of the plan. We maintain, therefore, that the assumed delivery rates for market and affordable housing with the District are <b>neither robust nor credible</b>.</p> <p>We have already been at great pains to put forward our views on how the plan deals with the worsening affordability crisis. This Council's insistence that so many of their long standing town centre brownfield sites are once again trotted out as housing allocations demonstrates their lack of commitment to the delivery of affordable housing in the District. <b>These sites will not deliver the level of affordable housing the District requires.</b></p> <p><b>The land at the former Blakedown Nurseries site could deliver a market or a 100% affordable housing scheme and invite its allocation. This would make a substantial contribution to rural affordable housing or market housing supply in what is a very constrained area. Furthermore, the provision of bungalows on the site could address the needs of older people or those with limited mobility.</b></p> <p>We have already stated that Policy 8B (Affordable Housing Provision) only proposes a minimum annual average of 90 affordable dwellings per annum which is 43% lower than the</p> <p>158 net annual need identified by The Housing Needs Study (2018). Over the plan period this would equate to a <b>1,360 shortfall in affordable housing provision therefore further worsening the housing crisis.</b></p> <p><b>Deliverable Sites</b></p> <p>The opportunities presented by Green Belt sites in the rural villages are significant. Seeking to allocate 49% of the housing requirement on old town centre brownfield sites that have repeatedly failed to come forward will put the plan at serious risk of failure.</p> <p>We have set out some examples of sites where we consider that delivery has been an issue, demonstrating that the delivery of the strategy is at risk. The Council have insisted that they do not need Reserve Sites, with just a 130 dwelling yield from the small number of reserve sites still included in the plan, this represents just 2% of the total requirement. This does not provide anywhere near the level of flexibility required, in the event, for instance that affordability continues to worsen and the market shows no sign of stabilising.</p> <p><b>This policy approach is contrary to NPPF as the plan is not positively</b></p>			

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								<p><b>prepared or effective and therefore fails the tests of soundness.</b></p> <p>As we have highlighted, the lack of reserve housing sites (bar a very small number of sites totalling 130 dwellings and representing just 2% of the total proposed housing allocations), is of particular concern.</p> <p>The Framework is clear at paragraph 11 (a) that:</p> <p><i>'plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change'</i></p> <p>There is no flexibility within this plan concerning the delivery of housing. Given the constraints of the District in terms of Green Belt the use of a minimum housing target will simply result in a default cap on delivery.</p> <p>The landowners would like the council to consider the allocation of their site as a Reserve</p> <p>Site, in the event that it not subject to an allocation now.</p> <p><b>We therefore consider the use of a far greater number of Reserve Sites to be vital in addressing the requirements of the Framework, or the plan will not be consistent with the relevant parts of the Framework.</b></p>			
Judith Clark	<a href="#">ALPPS92</a>	AM36/BR/RO/2	Object	Yes	No	No	Justified	<p>The site at Lem Hill Nurseries is not suitable for a housing development for the following reasons :</p> <p>There is no employment in the hamlet and therefore any additional residents will be commuting, putting greater impact on local roads and public transport(of which there are no services that would support working people as they are so irregular).</p> <p>There are no services in Far Forest except a small local shop, this will again add to road traffic use and pollution.</p> <p>New road is used for school traffic and additional housing will increase traffic and safety . There is no footpath on Church road so pedestrian and traffic are sharing the road.</p>	Remove BR/RO/2 Lem Hill Nurseries from the local plan	Yes	So the panel understand the local point of view

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								<p>The school has no more places for new children.</p> <p>The A4117 and the Church Road Ranters Bank intersection is already dangerous with little visibility of traffic coming from Cleobury Mortimer. Additional traffic from the housing will increase this dangerous intersection.</p> <p>The road next to the proposed development has no footpath and is used by locals to access a community woodlands, many people walk dogs in the woodlands and with increased traffic this would increase the probability of accidents.</p> <p>The area and surrounding area is Green Belt and as such supports a wide array of wildlife, including deer, frogs, slow worms, and grass snakes.</p> <p>The hamlet , as stated above, has no services, no doctor, no police, one small primary school, one small shop, useless public transport , limited sewerage, limited broadband, no employment.</p> <p>I cannot think of one good reason to use this site for 20 houses, circa 60 additional residents in a hamlet that doesn't even have the services to support the existing population.</p> <p>If additional housing is required in Wyre Forest then use Brown Field sites that have services for that population in walking or cycling distance or good public transport links, none of which Far Forest has.</p>			
Taylor Wimpey West Midlands	<a href="#">ALPPS246</a>	AM36 - New site put forward	Comment					<p>Taylor Wimpey is currently in control of the site known as Land at Belbroughton Road, Blakedown, as shown on the Site Local Plan included at Appendix 1 to this Representation. The land is promoted for residential led development, including areas of open space and other supporting infrastructure.</p> <p>The site comprises approximately 19 hectares of land and capable of accommodating approximately 400-450 dwellings (assuming 60% of the site is developable at a density of 35-40dph net).</p> <p>Given the extent of the site, there exists the opportunity for development to be delivered in phases commensurate with the size of the existing settlement.</p> <p>Furthermore, there is also potential for any development to deliver a flexible social/community facility, dependent on need and demand, serving to improve the overall sustainability of Blakedown as a settlement.</p>		Yes	<p>Taylor Wimpey considers it necessary to participate in the oral part of the examination due to a number of amendments/clarifications that are sought in respect of the plan.</p> <p>Taylor</p>

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								<p>Early indications suggest the site is capable of being accessed by either Birmingham Road (A456) to the west, or Belbroughton Road (B4188) to the south (or a combination thereof).</p> <p><b>Blakedown</b> As set out previously within this representation, the Amendments to the Pre-Submission Publication Document is clear throughout that Blakedown represents a sustainable location for development. This includes the recognition that Blakedown benefits from the only other railway station in the District, beyond that of Kidderminster.</p> <p>Blakedown benefits from a number of local services and facilities, including a primary school, post office, public houses, direct hourly bus services to Kidderminster and Halesowen. It is therefore considered that Blakedown has a good number of local services and facilities including very good public transport links to nearby larger settlements.</p> <p>As set out previously, it is accordingly contented that Blakedown warrants elevation within the settlement hierarchy identified within the Local Plan Review.</p> <p>Further consideration of the site is set out below having regard to the Council's evidence base and the technical information prepared on behalf of Taylor Wimpey to date. This analysis concludes that land at Belbroughton Road, Blakedown, within the control of Taylor Wimpey is both suitable, deliverable and developable. This provides confidence that the proposed housing allocation is 'soundly' based.</p> <p><b>Green Belt</b> Land at Belbroughton Road currently lies within the West Midlands Green Belt. The Strategic Review of the Green Belt as set out earlier within this Representation identifies that Parcel E4 (within which the site is located) makes a 'contribution' to the purposes of the Green Belt as set out within the NPPF. This is explored further below.</p> <p><b>1) To check the unrestricted sprawl of large built-up areas</b> <i>Green Belt Review Score for Parcel E4 - Contribution</i></p> <p>The Green Belt Review identifies that Parcel E4 forms part of open land between Hagley and Blakedown and helps to maintain the gap between these settlements.</p> <p>Whilst the location of the Parcel is not disputed, Land at Belbroughton Road within Parcel E4 benefits from existing strong, defensible boundaries and</p>			Wimpey also considers it necessary to participate due to the significance of the Kidderminster Eastern Extension in the overall spatial strategy contained therein.

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								<p>would round off the Blakedown to the north-east. The site is adjacent to existing residential development to the south and west, with development to the south of the site running eastwards along Belbroughton Road. Similarly, to the west, the Local Plan Review identifies a housing allocation at Land North of Station Drive. The site is bounded to the north by a series of inter-connected pools, which ultimately drain into the River Stour at Kidderminster to the west. This watercourse serves as a strong defensible boundary, preventing encroachment further to the north beyond Blakedown. Similarly, there exists a strong belt of woodland to the east of the site which runs in a north-south direction between Windmill Pool and Belbroughton Road. This again creates a strong defensible Green Belt boundary.</p> <p>The development of Land at Belbroughton Road would not result in development beyond the existing northern and eastern extents of Blakedown and would therefore not result in sprawl towards neighbouring settlements.</p> <p>It is therefore considered that Land at Belbroughton Road makes a limited contribution to restricting sprawl of built-up areas.</p> <p><b>2) To prevent neighbouring towns merging into one another</b> <i>Green Belt Review Score for Parcel E4 – Limited Contribution</i></p> <p>Blakedown is washed over by Green Belt, with the intention of preventing the merging of Kidderminster with the edge of the West Midlands conurbation at West Hagley. However, it remains that there is a considerable green gap between Blakedown and West Hagley to the north-east and, as set out above, the development of the site would not result in development beyond the existing northern and eastern extents of Blakedown and would therefore not result in sprawl towards neighbouring settlements. The development of the site would not result in neighbouring towns merging into one another.</p> <p>Land at Belbroughton Road accordingly makes a limited contribution to preventing neighbouring towns merging into one another.</p> <p><b>3) To assist in safeguarding the countryside from encroachment</b> <i>Green Belt Review Score for Parcel E4 - Contribution</i></p> <p>While it is acknowledged that in theory the release of any land from the Green Belt could result in encroachment, it is considered that the site offers the opportunity to provide and strengthen existing strong and defensible boundaries which will protect the countryside and maintain the visual separation between Blakedown and West Hagley. The site is bounded to the</p>			

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								<p>north by a series of inter- connected pools and to the east by a band of mature woodland, preventing further encroachment to the north and east beyond Blakedown.</p> <p>The release of this site from the Green Belt will not compromise the purpose of safeguarding the countryside from encroachment and therefore makes a limited contribution in this regard.</p> <p><b>4) To preserve the setting and special character of historic towns</b> <i>Green Belt Review Score for Parcel E4 – Limited Contribution</i></p> <p>Blakedown is not considered to be a historic town, nor are there any other historic towns in the vicinity of the site. The site therefore makes no contribution in this regard.</p> <p><b>5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</b> <i>Green Belt Review Score for Parcel E4 – Limited Contribution</i></p> <p>The release of this land from the Green Belt would not prevent the recycling of derelict and other urban land. The previous Core Strategy and Site Allocations and Policies Local Plan allocated a significant amount of brownfield land for redevelopment; however, the supply of suitable brownfield land is now reducing. Therefore, the Local Plan Review has decided to undertake a Green Belt Study in order to meet its housing needs. The development of the site can be appropriately phased within the housing trajectory to take account of the availability and deliverability of brownfield sites across the District.</p> <p>The release of the site from the Green Belt will not prejudice the recycling of derelict and other urban land. The site therefore makes no contribution in this regard.</p> <p><b>Green Belt Summary</b> In light of the above, it is asserted that the site makes a 'limited contribution' to Green Belt purposes, rather than a 'contribution' as identified for the wider Parcel E4 within the Green Belt Review. Given the enclosed nature of the site and presence of existing strong defensible Green Belt boundaries, the development of the site would not result in increased sprawl towards Hagley.</p> <p style="text-align: right;"><b>Green Belt Review    Pegasus Group Assessment of Land at Parcel E4                    Belbroughton Road</b></p>			

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								<p>Sprawl Contribution Limited Contribution                      Merger Limited Contribution Limited Contribution                      Encroachment Contribution Limited Contribution                      Setting Limited Contribution No Contribution                      Regeneration Limited Contribution No Contribution                      Overall Contribution Limited Contribution</p> <p>It has been demonstrated that the release of the site from the Green Belt would not compromise the five purposes of Green Belt land and is entirely in accordance with national policy regarding the release of land from the Green Belt. The site is well contained within strong, defensible boundaries and will minimise encroachment into the countryside while maintaining the clear visual separation between Blakedown and Hagley. It would not compromise the setting of any historic towns and would not prejudice the recycling of derelict and other urban land. Therefore, it is considered that the site represents appropriate Green Belt release to deliver residential development in a sustainable location.</p> <p><b>Accessibility to Amenities</b>                      Blakedown is a sustainable settlement which benefits from a wide range of services and facilities, including a primary school, post office, two public houses, a church and parish rooms. The site is well-related to these amenities, with the eastern extent of the site being located less than 1km away from the centre of Blakedown.</p> <p>Furthermore, Blakedown benefits from excellent public transport services, including twice-hourly rail services between Kidderminster, Worcester and Birmingham. Similarly, frequent bus services run along Birmingham Road between Halesowen and Kidderminster. These services run hourly and operate throughout the day, including the Am and PM peak hours.</p> <p>The site is also well related to the other towns in the District with Kidderminster and the West Midlands Conurbation easily accessible via the A456.</p> <p><b>Highways and Transportation</b>                      Birmingham Road to the west of the site is approximately 6.6m wide and transitions from a 60mph speed limit to a 30mph speed limit just before the site's north-western corner. Footpaths exist on both sides of the carriageway, with street lighting being sited up to the point at which the road becomes a 60mph limit. Good opportunities therefore exist to facilitate walking and cycling between the site and amenities to the west of the site, including</p>			

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								<p>Blakedown Station.</p> <p>Belbroughton Road to the south of the site is approximately 5.5m wide and is subject to a 30mph speed limit, but does not benefit from street lighting.</p> <p>Opportunities exist to access the site from a combination of Birmingham Road and/or Belbroughton Road, subject to detailed highways and junction assessments.</p> <p><b>Flood Risk and Drainage</b> The site lies in Flood Zone 1 and is therefore sequentially acceptable for development. The series of pools to the north of the site are located within Flood Zone 3. However, this zone of influence does not extend onto the site.</p> <p>Further detailed work would be required in order to support a planning application. However, it is likely that any masterplan for the site would include an element of open space between watercourse and any built form.</p> <p><b>Noise</b> The western boundary of the site lies adjacent to the carriageway edge of Birmingham Road (A456). It is anticipated that any dwellings along the western boundary would need to face the road in order to protect rear gardens and some additional glazing specification may be required to protect internal amenity. Further assessment would need to be undertaken in respect of noise, although it is considered unlikely that noise will have a significant adverse impact on the development of this site.</p> <p><b>Agricultural Land Classification</b> Natural England's Land Classification Map for the West Midlands Region (ALC004) shows that the site comprises of Grade 2 'Very Good' agricultural land. However, it should be noted that the majority of land around Blakedown comprises Grade 2 land, including the identified housing allocation at Land North of Station Drive. Grade 2 agricultural land is therefore clearly not a barrier to development, subject to other considerations.</p> <p><b>Suitability</b> The information set out above demonstrates that land North of Belbroughton Road is a suitable site for residential development.</p> <p><b>Deliverability</b> There is an agreement in place between the landowner and Taylor Wimpey to facilitate the development of the site.</p>			



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								<p>Whilst detailed technical work is yet to be carried out, initial assessments indicate that there are no constraints likely to render the site undeliverable in the Plan period. The site is available now.</p> <p>There are no existing uses that would require relocation and no issues of contamination that would require remediation. Many of the potential impacts of the development of the site can be mitigated through design and in many cases a positive outcome can be achieved, such as the strengthening the existing eastern boundaries of the site, creating an enduring Green Belt boundary east of Blakedown.</p> <p>The site is deliverable and immediately available and, subject to allocation and removal from the Green Belt, could deliver homes and associated community benefits within the next 10-15 years.</p> <p><b>CONCLUSION</b> Taylor Wimpey UK Ltd is in control of Land at Belbroughton Road, Blakedown. A small element of this land is identified within within the Local Plan Review evidence base as Site Ref: WFR/CB/4 'Land Adjacent to 77 Belbroughton Road'.</p> <p>The Pre-Submission Publication Document is clear throughout that Blakedown represents a sustainable location for development. This includes the recognition that Blakedown benefits from the only other railway station in the District, beyond that of Kidderminster. The Local Plan also identifies a wider Blakedown rail enhancement scheme, which forms part of Worcestershire's Local Transport Plan (LTP) 2018 – 2030.</p> <p>This Representation has demonstrated that there are grounds for Blakedown to be elevated to at least the fourth-tier '<i>Villages Covered (Washed Over) By Green Belt</i>' on sustainability grounds. Nevertheless, it could therefore be argued that Blakedown warrants the creation of a new tier, sitting beneath the third-tier market town of Bewdley. This new tier would recognise the substantial sustainability credentials of Blakedown and it is contented that Blakedown should accordingly serve a greater role in meeting housing needs within Wyre Forest District.</p> <p>Land at Belbroughton Road, Blakedown, is sustainably located adjacent to Blakedown and is capable of delivering 400-450 new homes to meet an identified market and affordable housing need within Wyre Forest District. Given the extent of the site, there is also potential to deliver a social/community facility, dependent on identified need, thus furthering the sustainability of Blakedown as a settlement overall.</p>			

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								<p>It has been demonstrated that the site makes a limited contribution to the five purposes of the Green Belt and that the release of the land for development would not compromise the Green Belt in the long-term.</p> <p>The site is deliverable and, subject to allocation, could deliver homes and associated community benefits within the next 10-15 years.</p> <p>In previous representations made by Pegasus Group on behalf of Taylor Wimpey, concern was raised regarding the Government's stated intention to revert to the 2014 Sub-National Household Projections (SNHP) from the 2016 SNHP when determining housing need. It is therefore encouraging to see that, at Policy AM6A and Paragraph AM6.5 of the Amendments to the Pre-Submission Publication Document, the Council continues to commit to utilising the 2016 SNHP, resulting in a (minimum) housing requirement of 5,520 homes (276 per annum). This is justified on grounds that the Council wishes to be ambitious with its housing requirement figure in order to support economic growth and affordable housing delivery. This approach is supported by Taylor Wimpey and facilitated by Planning Practice Guidance.</p> <p>Nevertheless, it remains that the 29ha employment land requirement does not appear to take into account what could be needed in the event of Wyre Forest seeing stronger economic growth linked to the aspirations of the Local Enterprise Partnerships in which the District lies. It is unlikely that Wyre Forest District will make much of a contribution to identified growth targets 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>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>			
Jemma Sherwood	<a href="#">ALPPS90</a>	36.10	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p><b>Station Yard</b></p> <p>This is a problematic proposal for a number of reasons.</p> <ol style="list-style-type: none"> <li>1. There was planning in 2008 for 34 cars along with safeguards for residents re. lighting, hours of use. Now the proposition is 80 cars which is a huge increase.</li> <li>2. There will be a lot of traffic. If the entrance is off Lynwood Drive (a cul-de-sac with 35 houses) this will be a huge strain on the road. There will be an increase in light and noise pollution.</li> <li>3. A car park always brings an increase in antisocial behaviour. This car park, being in rural, isolated location away from police and casual</li> </ol>	You need to revert to the original planning of 34 parking spaces with associated safeguards for residents.	No	

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								<p>footfall, will be prime space for drug dealing and petty crime. This is a wonderful village and we would mourn the loss of its safety and peace, especially in the evenings, should a car park be installed on the proposed site.</p> <ol style="list-style-type: none"> <li>4. The proposed hours of use (0600-2330) are not appropriate for a residential area.</li> <li>5. If the site is to be accessed from Station Drive there are massive implications for traffic, especially given the level crossing immediately by. There is a small section of road from the level crossing to the A456 that could not accommodate queues of traffic.</li> <li>6. The small sections of road around the crossing are not safe for an increase in pedestrians. There are already problems with cars in and around the station causing dangers to pedestrians (especially children), and extra parking of the size being proposed would amplify the problems. Much of the busy times would be when we are taking our small children to and from school. I genuinely cannot see how any infrastructure assessment completed with the remotest notion of due diligence would not highlight the complete unsuitability for an increase in traffic on and around the level crossing. There is not safe pedestrian access to the station. The level crossing is narrow and not able to cope with lots of people as well as cars. Combined with the proposed development on the other side of the road, the whole notion is ridiculous!</li> <li>7. With regards to traffic, there would be an increased use of the country lanes that come to the area. These roads are not designed for heavy traffic flow.</li> <li>8. The congestion towards and <u>away from</u> Blakedown Station is already problematic, particularly going from Blakedown through Hagley towards Birmingham on the A456. This stretch of road (between Blakedown and Hagley) is horrendously congested at rush hour, and mildly congested at other points throughout the day. Sometimes the queues of traffic are over a mile long. This road <u>will not cope</u> with any more traffic.</li> </ol> <p>At a Parish Council meeting last year regarding safe crossings on the A456, we were told by Councillors that we could not have any kind of traffic calming measures or other crossings near the school because we didn't need them (even though there was plenty of anecdotal evidence of near misses with people crossing the road). Why is the same Council now prepared to increase the level of danger around the same area? Absolutely appalling!</p> <p>I am very angry that the Churchill &amp; Blakedown Neighbourhood Plan is being ignored in all this and that the District Council seems intent on turning a small village into a car park. This is not acceptable and I am hugely</p>			

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								disappointed in the Council.			
Claire Wood	<a href="#">ALPPS113</a>	Policy AM36.10 FR/CB2	Object	No	No	No	Positively Prepared Justified Effective	<p>This is a major development and amendment that has been given last minute consideration and lack of proper consultation.</p> <p>Proper co-operation has not been undertaken with adjoining authorities (Bromsgrove and Wychavon) to create a combined strategy to deal with infrastructure issues relating to rail use and also the congestion issues on A456, A450 and in Hagley.</p> <p>The evidence base is scant, unreliable and untested.</p> <p>Blakedown does not have the parking needs on the scale proposed.</p> <p>The Churchill and Blakedown Neighbourhood Plan has been ignored and I believe it should be considered as context for the proposed amendment.</p> <p>We are being used as a scapegoat for Kidderminster as WFDC have failed to deliver the planned multi-storey car park at Kidderminster station.</p>	Proper consultation with the local community using an evidence base that considers the highway implications; safety of the level crossing; in particular the impact of the additional traffic on Lynwood Drive and Station Drive; the impact on pollution levels in particular given the proximity to the primary school; safety of pedestrians using the station in particular that volume of children using it to travel to school - consultation with Network Rail should be undertaken.	Yes	I will be directly impacted by the proposed amendment.
Neil Rowlinson	<a href="#">ALPPS82</a>	AM 36.10 FR/CB/2	Object	No	No	No	Justified Effective Consistent with National Policy	<p>The evidence for the Transport Plan is incorrect and untested.</p> <p>The projected need doesn't address where within Wyre Forest the need is and how access could be achieved. The whole infrastructure needs to be considered i.e. how to get to car parking, not just car parking space numbers.</p> <p>Allowing up to 80 cars plus 170 in Station Drive Field would put considerable stress on the road infra-structure designed to serve a quite rural station and small village cul-de-sac.</p> <p>The additional traffic movements are likely to further add to light and noise pollution as well as reduction in air quality for the residents of the village since the A456 is very busy during peak periods. Furthermore, the busiest times will coincide with children making their way to the local primary school plus others walking to the station, via Station Drive/Mill Lane to travel to secondary school.</p> <p>Proper consideration has not been given to a fully integrated public transport infrastructure with proper modelling of real journeys and their impacts.</p>	Blakedown Station Yard had previously had planning in 2008 for 34 cars with conditions on hours of use, lighting, etc to safeguard local residents. This would certainly be plenty of space for the current needs and allow for expansion into the future period.  Better linking of Public Transport to the Railway Stations to reduce the need for private car	No	

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									<p>movements.</p> <p>If a Parkway type facility is needed then this should be located where safe road access is possible without adding to road congestion issues, such as off a Dual Carriageway not from a Busy Single Carriageway and then via a village residential road.</p>		
Avril Nicholson	<a href="#">ALPPS86</a>	AM36.10 Callows Yard	Object		No	No	Positively Prepared Justified Effective	<p>The plan to convert Callows Yard to station car parking for 80 cars is unsound because there is no safe access to the site. The proposed access via Lynwood drive is unsound due to the fact that Lynwood Drive is a narrow residential cul-de-sac. Having 80 cars accessing the site through Lynwood drive is likely to cause poor air quality as there would inevitably be extensive queueing due to the narrowness of the road. It is also likely to create noise and light pollution especially if the extended hours were endorsed, as suggested in the plan.</p> <p>Furthermore additional parking at Blakedown would create additional car journeys or/and miles driven, since the majority of additional rail users would live in in Kidderminster or the settlements to the west there of.</p> <p>It appears no consideration has been given to improving local bus services to serve the rail network. Development of such services would both reduce the carbon emissions and be more equitable for the residents of the Wyre Forest as they would allow residents who are unable to drive by reason of disability, age or economics to make use of the rail network.</p>	<p>I feel that use of station yard is in appropriate for large numbers of cars due to the access arrangements, with neither access via Lynwood Drive or station drive being safe and effective. Reducing the number of spaces could mitigate this problem. However, alternative use of the land such as developing allotments ( there are none in Blakedown and I understand the council has a legal duty). Or a community orchard, reducing food miles.</p>	No	
Avril Nicholson	<a href="#">ALPPS88</a>	AM36.10	Object		No	No	Positively Prepared Justified Effective	<p>My conviction regarding this proposed car park is that it will have the following negative impact in terms of traffic congestion around Station Road and Lynnwood Drive ; so residents on Lynnwood Drive will struggle to leave and exit the village in the morning. Lynnwood Drive is a small cul-de- sac it does not have the space for large volumes of incoming traffic. It will impact residents negatively in terms of air quality and effect their privacy. There is</p>	<p>I suggest that an extra station between Kidderminster with suitable parking might be a better option in the long term for</p>	No	

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								already better facilities at Kidderminster station where there is more trains stopping. In my view it would therefore be better to expand and improve the existing parking at Kidderminster.	people commuting from Kidderminster and new housing developments on the edge of the town. Also, improving bus links to Blakedown.		
Christopher Perry	<a href="#">ALPPS93</a>	Policy 36.6 Station Yard Blakedown WFR/CB/2 – additional wording	Object	No	No	No	Justified Effective Consistent with National Policy	<p>The Proposal does not conform with National Planning Policy guidance</p> <p>The evidence base is unreliable and is untested</p> <ul style="list-style-type: none"> <li>· Kidderminster Station is more sustainably located and offers better services than Blakedown.</li> <li>· The focus of investment and development should be in Kidderminster.</li> <li>· Building more car parks leads to more cars on our roads, which is contrary to Government's target for the UK to become Carbon Neutral by 2050</li> <li>· Investment in connecting public transport services is required, not park and ride stations in the Green Belt</li> <li>· The Local Plan is not sustainable</li> </ul> <p>The proposed expansions on the east of Kidderminster and at Lea Castle are only sustainable if sites in Blakedown are developed as a car park and housing for which there is no identified or proven need on this scale for the latter.</p> <ul style="list-style-type: none"> <li>· Blakedown is a small village with only very limited facilities - it cannot be described as a sustainable village. It has just one shop, two pubs and a small primary school.</li> </ul> <p>It has no secondary school, limited employment, limited bus services, and no healthcare services.</p> <p>The proposed car park is very close to the existing level crossing and there is danger of cars queuing back over it.</p> <p>Junction layouts at A456/Station Drive, Lynwood Drive are unsuited to the extra volume of traffic.</p> <p>There is likely to be increased use of unsuitable country lanes - Hurcott, Waggon, Perriford, Churchill, Mill Lanes to access the car park.</p> <p>The A and B road networks to reach Blakedown Station from Kidderminster, Lea Castle, Hagley and Belbroughton are already congested at peak times and the additional car park proposed will lead to increased road congestion and a worsening of air quality in the villages of Churchill and Blakedown.</p> <p>Local highways are inappropriate for such an intensification of use. Station</p>	withdraw this policy proposal	No	

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								<p>Drive, Mill Lane and Lynwood Drive were designed to serve a small residential area and a small village railway station.</p> <p>I am very concerned about safe pedestrian access to platforms from car parks - will there be a bridge? At present the level crossing barriers can be down for around 30 minutes in every hour, with six passenger trains per hour crossing the level crossing, and additional services at peak times plus an increasing number of freight services.</p> <p>It appears to me that the Churchill &amp; Blakedown Neighbourhood Plan has been ignored</p> <p>I believe that this is a sham consultation, these amendments have been added very late into the process and the consultation events were held mainly during the summer holiday period and at times when economically active people are out at work.</p> <p>The consultation response documentation appears to have been designed to make it as hard as possible for people to comment.</p>			
Douglas Wood	<a href="#">ALPPS112</a>	Policy AM36.10 FR/CB2	Object	No	No	No	Justified Consistent with National Policy	<p>Neighbourhood plan already provides for small scale development so this development is not justified.</p> <p>The station parking needs were identified as a further 10 spaces in all documentation until July 2019.</p> <p>The evidence base is unreliable and untested. Blakedown is not as sustainable as the plan suggests.</p> <p>Lynwood Drive is a cul-de-sac of 35 houses, not an access road to an 80 space car park with an additional 160 vehicle movements per day. Junction lay outs as A456/Station Drive and Lynwood Drive are unsuited to extra volume of traffic.</p> <p>Churchill and Blakedown Neighbourhood Plan has been ignored. Local Highways are inappropriate for such intensification of use. Station Drive, Mill Lane and Lynwood Drive were designed to serve a small residential area and village railway station.</p>	Proper consultation with the local community to consider highway implications, level crossing safety, pollution levels from additional vehicles, pedestrian safety, consultation with Network Rail.	No	
Neil Rowlinson	<a href="#">ALPPS83</a>	AM 36.19 Appendix B - Map J	Object	No	No	No	Justified Effective Consistent with National Policy	<p>The evidence base for the Plan is not reliable nor has been appropriately tested.</p> <p>The Scheme does not comply with national planning guidelines:</p>	A clearer justification of the Station Car Parking increase projections for realistic areas within Wyre Forest is needed. A	No	

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

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								<ul style="list-style-type: none"> <li>• A Major Development that has been given last minute consideration and lack of proper Consultation</li> <li>• Proper cooperation has not been undertaken with adjoining authorities (Bromsgrove and Wychavon) to create a combined strategy to deal with infrastructure issues relating to rail use and also the A456, A450 and congestion issues such as in Hagley.</li> <li>• Blakedown has a very limited local Housing Need not what was suggested in the Plan</li> <li>• There is not the need for car parking on the scale the Plan indicates based on either Blakedown and its surrounding area (previous data identified requirement for 10 additional spaces at Blakedown, far less than the 250) or even growth across projected across Wyre Forest.</li> <li>• The Scheme will cause over intensification of use and loss of amenity to neighboring residents</li> <li>• Exceptional circumstances have not been shown for the removal of the land from Green Belt, currently an arable field buffering Blakedown from Hagley along the A456 transport corridor.</li> <li>• The Plan contradicts the previous 2017 WFDC Green Belt Review Document</li> <li>• The Plan does not comply with the adopted Churchill and Blakedown Neighborhood Plan by moving the settlement boundary into the Green Belt.</li> </ul>	<p>clear modelling of anticipated movements down available highways needs to be considered so that the facilities are provided where they are needed, will be made use of, and, that will not cause further transport issues.</p> <p>Integrating Public Transport such as Bus with Rail may also reduce projected needs for private car movements and car parking.</p> <p>Other sites located with easier access for the population centres of Bewdley and Stourport should be explored as being both more effective and better from an environmental impact viewpoint (Brown Field rather than Green Belt).</p>		
Jacquelyn Sharp	<a href="#">ALPPS98</a>	AM36.19 Land off Station Drive, Blakedown, WFR/CB/3	Object					<p>1.I would like to object to use of Green Belt land to provide additional housing and car parking because of environmental and biodiversity grounds. I think that the natural environment should be protected and the additional cost of making available brownfields sites suitable should be met by government or the council if necessary to make it commercially viable and suitable for pleasant housing use .</p> <p>2. If Green Belt land in/adjacent to Blakedown, must be used for this purpose, I would also like to object to any housing provision that is beyond that has been predicted to be needed in Blakedown , in order to minimise loss of the Green Belt and in order to minimise any additional related traffic</p>		No	



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								<p>congestion and traffic related pollution.</p> <p>3 I object to the provision of parking places beyond that predicted to be needed by Blakedown station users and those for whom Blakedown is the nearest station. I think that the A456 and road junctions within Blakedown are already very busy and attracting additional traffic which would add to the congestion and vehicle related pollution would be unwise, particularly so close to the primary and junior school and the route taken by parents siblings and schoolchildren walking to school.</p>			
Suzy Scriven	<a href="#">ALPPS6</a>	Policy AM36.11	Object	No	No	No	Effective	<p>This is a flawed questionnaire. It is difficult for people to understand. It doesn't even make sense. I have ticked effective because you have to tick a box. Blakedown car park and housing proposal is outrageous.</p> <p>Firstly, Green Belt land should never be used to build anything, it should be protected which was the purpose of Green Belt land in the first place.</p> <p>A two storey car park is not required for the Blakedown community and will be incongruous to the village. It will be used by people from outside the village who can't get spaces at kidderminster and Stourbridge stations particularly and if it is either free of charge or cheaper.</p> <p>Why is a multi-storey car park not being built at kidderminster station instead?? Maybe because it's cheaper to build one in the small village of Blakedown as the houses will pay for it!!</p> <p>There will be traffic congestion because there is no infrastructure for cars getting out onto the main road. I.e. traffic lights or roundabout.</p> <p>At busy times or when the level crossing barrier is down for prolonged periods the traffic will be backed up on either sides and may also spill out onto the main road, causing more congestion, danger and pollution to pedestrians.</p> <p>There will be an increase of pedestrian and traffic hazards where risks are taken to get across the barrier after the lights go off and the barriers come down - people rushing to catch trains.</p> <p>It will be extremely dangerous for school children and other pedestrians due to increased traffic and congestion.</p> <p>Local residents close to the estate and car park will be affected by noise, congestion, danger., pollution.</p>	<p>Blakedown car park and housing proposal is outrageous.</p> <p>Firstly, Green Belt land should never be used to build anything, it should be protected which was the purpose of Green Belt land in the first place.</p> <p>A two storey car park is not required for the Blakedown community and will be incongruous to the village. It will be used by people from outside the village who can't get spaces at kidderminster and Stourbridge stations particularly and if it is either free of charge or cheaper.</p> <p>Why is a multi-storey car park not being built at kidderminster station instead?? Maybe because it's cheaper to build one in the small village of</p>	No	

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								<p>The already narrow road to the barrier will be dangerous and congested.</p> <p>Blakedown Village is in danger of losing its identity and merging with other areas if it continues to develop.</p> <p>Yes we need a small car park, to alleviate cars being parked near to the station and outside outside local residents houses but not housing or a multi storey with that many spaces which will only benefit people from other areas.</p>	<p>Blakedown as the houses will pay for it!!</p> <p>There will be traffic congestion because there is no infrastructure for cars getting out onto the main road. I.e. traffic lights or roundabout.</p> <p>At busy times or when the level crossing barrier is down for prolonged periods the traffic will be backed up on either sides and may also spill out onto the main road, causing more congestion, danger and pollution to pedestrians.</p> <p>There will be an increase of pedestrian and traffic hazards where risks are taken to get across the barrier after the lights go off and the barriers come down - people rushing to catch trains.</p> <p>It will be extremely dangerous for school children and other pedestrians due to increased traffic and congestion.</p> <p>Local residents close to the estate and car park will be affected by noise, congestion,</p>		

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									<p>danger., pollution.</p> <p>The already narrow road to the barrier will be dangerous and congested.</p> <p>Blakedown Village is in danger of losing its identity and merging with other areas if it continues to develop.</p> <p>Yes we need a small car park, to alleviate cars being parked near to the station and outside outside local residents houses but not housing or a multi storey with that many spaces which will only benefit people from other areas.</p>		
Martin Hobson	<a href="#">ALPPS8</a>	Policy AM36.11	Comment	Yes	No	No		<p>The Local Plan does not take into account the already heavy pressure on local village life due to the density of traffic already using the A456 between the hours 0700 to 1900 hours both personel cars and commercial lorries (up to 30/40 tons).</p> <p>Traffic flow to Blakedown Railway Station from all parts of Kidderminster and the Wyre Forest District will increase enormously taking the pressure off Kidderminster Railway Station and car park. Also from the proposed new development at Cookley (Lea Castle growth).</p>	<p>Road layout to be altered on A456 between Station Drive and entrance to Harborough Hall to allow extra lane to take traffic into the proposed new car park. Exit from car park via Station Drive and island on A456 (traffic lights). A footbridge to be provided at Blakedown railway station Station Drive/Mill Lane end asautomatic gates closed for time before and after departure of trains.</p>	Yes	To confirm the importance on traffic flow on the A456 in both directions at this junction. Traffic must be kept moving.

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Michael Edwards	<a href="#">ALPPS13</a>	Policy AM36.11	Comment		No	No		<p>Ref: Increase in parking spaces and new build 50 homes in Blakedown. The proposed development was NOT in the village plan. The only requirement of local residents was for say 20-30 additional car park spaces by the railway station. The new draft proposal provides 170 places and 50 houses! The additional spaces and houses will increase traffic congestion in the village and exacerbate the already disruptive congestion on the road to Hagley.</p> <p>I would also comment that this form and the online submission process is discouragingly complex and long winded. I assume that this is a deliberate tactic to discourage comments. This is shameful!</p> <p>I assume the plan is driven by a builders offer to pay for the carpark.</p> <p>The wishes of the residents of the village have been ignored and that an ulterior agenda is being followed.</p> <p>I attended the meeting in Blakedown on 11 September and spoke to representatives of the Planning Department. Their comments were not helpful and rather negative. e.g. 'Be grateful you have a station' and 'at least you have shops - actually one general shop and a wedding dress shop.</p>	Stick to the village plan.		
Roger Shade	<a href="#">ALPPS35</a>	Policy AM36.11 Land off Station Drive Blakedown, WFR/CB/3	Object		No		Justified Effective	<p>National Policy states 'once established Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified ' Earlier Inspectors reports indicate that the Field was regarded as an important element in maintaining the 'Green Wedge' between West Hagley and Kidderminster . This will remain doubly important as West Hagley is now planning to develop land at the Southern Boundary of the Town thus squeezing the Green Wedge.</p> <p>I note from the Amec Foster Wheeler report on Green Belt land states "there are no recorded conservation or cultural heritage interests on the site". This is rather strange as there is a report 'Preliminary Ecological Appraisal' stating there is a Local Wild life site located to the North of the Site which is a sensitive receptor which requires buffering. The report says the Buffering will use up to one third of the Northern Part of the site. This will protect the LWS from the adverse effects of the development. They also "this will inevitably have a significant impact on the net development area. The LWS is very important area as it stretches right through the Parish via Churchill (a conservation area) also through to the the Hurcot pool which is an area of SSSI.</p> <p>I would question the need for 50 houses in Churchill and Blakedown, the Housing Needs Survey that was conducted prior to the Neighbourhood Plan said we would we would require require seven affordable homes and eighteen market homes. In our Plan we allowed for building homes on infill sites rural exception sites and windfall sites all within the Village Boundaries.</p>		No	

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								<p>Since making the NP 3 affordable homes have been built on an infill site one market home on a rural exception site and planning permission has been given for a further 3 market homes on an infill site. I understand there is a possibility of another rural exception site site in Churchill (which sadly hasn't been mentioned in the report even though it part of the Parish). It has been made clear the only reason for the inclusion of 50 homes is to help pay for the Car Park.</p> <p>In all the documents we had seen before prior to this report it seemed we only needed a further 10 parking spaces, even Station Yard with 79 spaces was not mentioned.</p> <p>The Station Yard Car Park was not mentioned in the earlier report and although this development directly effected Blakedown there was no drop in session to review 36.6 in Blakedown.</p> <p>I am rather doubtful about the SLC reports conclusions about a growth in passenger numbers over the next 30 years. Apparently it is based on a Network Rail's Markets report in 2013/14. We have not been told what sort of questions were asked,the sample size, how often these surveys are done and for what purpose beside strategic planning.</p> <p>The Consultant also seeks to justify these comparing them with numbers who travelled by train over the period 1998/2018. There may be a number of reasons for these figures which may not always apply. There are large number of changes in the workforce not least of which may be the changes in the Local economy, the demise of the Carpet manufacturing business.</p>			
Jessica Lahive	<a href="#">ALPPS28</a>	Policy 36.11, Land off Station Drive, Blakedown, WFR/CB/3	Object		No	No	Consistent with National Policy	<p>This plan is not in accordance with the neighbourhood plan which allows for some growth but definitely not on this scale. I do not believe it is justifiable to have this size of housing development or such a huge car park in a rural location. There is a huge access issue and I'm very concerned about the safety issues. I'm not aware of any independent study that shows this is safe location for such a big development. The huge increase in traffic that the car park (s) would result in has not been properly considered and I'm very concerned about the risk to pedestrians in a location used already by many children to access the primary school and the high school via the train station each day. The roads in the village cannot accommodate safely all of the additional traffic that the huge new car park would lead to. I believe previously 10 additional spaces were deemed to be the need and therefore the amended plan is not proportionate.</p> <p>The original plan suggested 65 additional dwellings. The amendment has now increased this to 115 in the same villages, with no justification for the increase. It appears that that increased in size is purely as a means of paying for the proposed new car park. This is not reasonable.</p>	To remove the amended proposals regarding the two Blakedown developments and revert to the previous plan.	No	
Steve Fletcher	<a href="#">ALPPS31</a>	Policy AM36.11	Object		No	No	Justified Consistent with	The site in the present proposal is not appropriate as it introduces a substantial movement of vehicles into and out of Lynwood Drive at busy	Presumably the plan was previously sound	No	

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		Land off Station Drive Blakedown, WFR/CB/3					National Policy	<p>times of the day. It will present a dangerous mix of vehicular and pedestrian movements which has the potential for serious injury and fatality. The use of the land does not contemplate an entrance off Station Drive due to its proximity to the level crossing. So in turn it brings the access and egress to Lynwood Drive.</p> <p>WFDC has recently declined an application for a mixed use residential property in Roxhall Close due to the inability of parking at the residence which results in significant on street parking of customers. WFDC declined the application due to a substantial increase in vehicular movements something they now propose to compound many times over with the introduction of a car park.</p> <p>Rail data prepared by SLC has resulted in assessment of 250 spaces being required when all previous assessments have suggested a need for 10 spaces. There has not been chance to consider their brief when preparing their report or indeed the models or assumptions they have considered in arriving at this very substantial increase on the accepted requirements for the village. There is significant doubt that an evidenced based approach has been used to inform the policy in a proportionate way.</p> <p>Agile working will significantly impact any assessments made regarding future rail use with more and more companies encouraging employees to be flexible and work from home.</p> <p>Pay to park car parks will only serve to encourage more on street parking causing further nuisance and obstruction to emergency services vehicles and personnel.</p> <p>Inappropriate scale of development versus local village need.</p> <p>On street parking has improved with the introduction of yellow lines encouraging more considerate parking by those using the village streets commuting into Birmingham and other places.</p> <p>Any extension to the already approved spaces will only serve to provide further nuisance, anti social behaviour and a scene of crime which will receive no local policing.</p>	<p>and compliant prior to the introduction of this amendment and so I would propose removing this policy from the plan and presumably it would then revert to being sound and compliant in its original form.</p> <p>Lighting to the site will cause intrusion and nuisance to local residents.</p> <p>Insufficient screening of the car park.</p> <p>Lack of pedestrian and vehicle segregation.</p> <p>Substantial increase of vehicular movements into a quiet residential street.</p> <p>There are 30 spaces already provided and approved in the plan. Further extension is unwarranted and based upon data and reports that are at substantial odds to previously considered assessments. The provision within the previous approved plan will be sufficient to accommodate the previously understood requirements of 10 additional spaces to serve the village need. People will not make the effort to use the car park or indeed pay for it. A large car park</p>		

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									is a white elephant paid for by residential development which is excessive versus local housing need and subject to a separate objection.		
Irene Pitt	<a href="#">ALPPS33</a>	Policy AM36.11 Land off Station Drive Blakedown, WFR/CB/3	Object		No		Justified Consistent with National Policy	<p>The development of Housing and Car Park would be on Green Belt land which is outside the village boundary and there seems to be no justifiable reason for the use of this land.</p> <p>It appears that the calculation of the area of land is incorrect as it does not account for the land to be used for the buffering of the Local Wildlife Site of special interest to the north of the area as set out in the government guidelines. This omission along with the miscalculation of the actual area of land detailed in the WFDC plans is significantly less than the required area for the plans for this development.</p> <p>The planned housing development far exceeds the required number of houses for Blakedown &amp; Churchill as in neighbourhood plan and therefore this use of Green Belt is unjustified as referred to in the National Planning Framework para 136. There are other small pieces of land in the villages which would accommodate the needs of the local area which would also not threaten the Churchill and Blakedown Valleys Wild Life Sites.</p> <p>It is obvious that the plans to build 50 houses is purely to fund the excessive car park and does not consider the local needs for the area.</p> <p>The estimated increase in passengers using Blakedown station in the future is an unqualified figure. These passengers would be coming in from a large surrounding area to a small village station with no facilities. A large number of these would be children not needing car park spaces therefore the requirements for car parking for Blakedown would be provided for by the 80 planned car park spaces already planned for at Station Yard, this would be more than adequate.</p> <p>The local roads/lanes would not be able to accommodate, at least twice a day, the huge increase in traffic 170 (new car park) + 80 (Station Yard) and 100 plus generated by the new houses i.e. A456, Station Drive, Mill lane, Churchill Lane, Wagon Lane and Stakenbridge Lane most of which are narrow country lanes where in places it is only wide enough for one vehicle. These roads are already heavily congested at peak times.</p> <p>With the barriers constantly in use the level Crossing is another highly congested area 3 to 4 hours a day with cars, pedestrians and also parents dropping off or picking up school children. With the increase in vehicles in trying to use Station drive/ Mill lane across the crossing and others accessing the Birmingham Road this could lead to a dangerous back up of vehicles onto the A456 and it therefore it becoming blocked in both directions.</p>	The local plan for the land off station drive to be abolished and only the car park at 36.6(Station Yard) be left in place as this is more than adequate for future needs.	No	

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								<p>The situation at the crossing would be a great threat to the safety of pedestrians using the trains which would include a large number of children coming and going to schools in the area. Also parents with their young children trying to get to the local school on the A456 going across a very busy level crossing and then main road. This is already a great concern to villagers. The drop in consultations days did not account for people at work as they occurred during the working day and week days only.</p> <p>This huge amendment to previous published plans affecting all residents of Churchill and Blakedown was put forward just a few weeks ago and has given local residents very little time to put forward their comments and objections and is totally inadequate.</p> <p>The plans exhibited at the drop in sessions did not show the site of the Station Yard which is to supply a further 80 car parks spaces. This may have been purposely left out as it would have made the area look even more congested than it is already.</p> <p>This impossible form which has been supplied for residents to use has obviously been contrived to put people off putting forward their objections.</p> <p>This plan would cause total chaos on the A456 and all surrounding roads at peak times. A road that is already heavily over subscribed with vehicles including heavy duty vehicles.</p> <p>The residents in the satellite road around the area of Churchill and Blakedown Railway Station will have extreme difficulty in exiting their roads or and emergency vehicles gaining access from the main road a large part of the day.</p> <p>In fact the whole area could become grid locked.</p>			
Jennifer Boulton	<a href="#">ALPPS46</a>	Policy AM36.11	Object	Yes	Yes	Yes		Traffic on Station Drive is already quite busy considering the narrowness of the street and parking down one side. Already, if I am returning home from Churchill Lane I can be unable to turn right immediately into my home (due to oncoming traffic). This means I block people crossing the line from proceeding. This is already dangerous and I dread to think what this will be like with greatly increased traffic.		No	
Shireley Campbell	<a href="#">ALPPS49</a>	Policy AM36.11	Object		No	Yes	Justified Consistent with National Policy	<p>It seems obvious that this plan is simply to avoid the cost of building a car park (as originally planned) in Kidderminster by doing a deal with a developer to build houses on Green Belt land. Such a plan will erode to fail to preserve the rural nature of the villages. I am very concerned about the lack of infrastructure to cope with the increase in traffic through roads/lanes and the already congested A456. There seems no evidence to show that it is absolutely necessary to retrace this Green Belt land for something like a car park.</p> <p>A 'pay' car park does not necessarily get used so it would be better to build a smaller number of spaces e.g 30/40 and then review its use. Hagley have</p>		No	



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								started charging for its cap park and is now half empty. It is likely that motorists will continue to park 'free' in village streets. The only reason motorists park in Blakedown is to avoid charges in Kidderminster etc.			
Andrea Julie Beech	<a href="#">ALPPS53</a>	Policy AM36.11	Object		No		Justified Consistent with National Policy	<p>The station car parking needs for Blakedown were identified as a further 10 spaces in all documents relating to the Plan until July 2019. A report was then produced by SLC requiring a further 260 places! At no time were we given the chance to understand the parameters of the brief against which this report was compiled, or to question the assumptions of the model used. There is significant doubt that the evidence informing this policy was proportionate. Equally, having regard to the recently introduced parking charges at Hagley Station and the subsequent virtually empty car park resulting, it is highly unlikely that potential users will pay to park at the proposed facility and will instead seek to find free parking on nearby residential roads.</p> <p>Whether the development takes place at Station Yard or on the Green Belt site under consideration, there are serious access, congestion and safety concerns relating to any such car parking/residential development. The A456 is one of the busiest commuter roads in the county, if not the country. The substantial increase in traffic from such a development would introduce serious safety concerns around the A456 itself, Belbroughton Road, Lynwood Drive, Roxall Close and Mill Lane. Mill Lane already carries traffic from Sculthorpe Road and the other roads within that loop, all of whom have no choice but to access the A456 from Mill Lane and Station Drive. During the morning and evening rush hours, there are already long delays for drivers trying to exit Station Drive onto the A456 - at a junction which is heavily used also by pedestrians (children and adults) walking to and from the school and the station.</p> <p>In addition to increased local traffic, developments at Lea Castle, Wolverley and Blakebrook in Kidderminster are also promoting Blakedown Station as their nearest connection. Traffic from these developments would (shortest route) access Churchill and Blakedown from Waggon Lane which is already dangerously narrow in places, relying on good sense and driver consideration to enable any passing of vehicles along the Churchill end of the lane. A large increase of traffic in Waggon Lane would be highly dangerous. From the end of Waggon Lane, their route would then be across the bridge at the foot of Mill Lane and around the very restricted bends by the Mill itself. This bridge is not designed to cope with heavy usage.</p> <p>There is also a huge issue for pedestrians, many of whom are children and commuters accessing the local school or the station for trains to Hagley/Stourbridge or Kidderminster/ Worcester schools. The access roads</p>		No	

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								<p>are narrow and in part without pavements (for example the pedestrian alley from the top of Brookside Way out onto Mill Lane, which has no pavement between the alley and Sculthorpe Road).</p> <p>The Housing Needs Survey for Churchill and Blakedown did not reveal any identified need for large scale development in the Green Belt surrounding the village. Such development can only be justified to pay for the car park development, which is neither necessary nor desirable in its proposed form. The original plan allocated 65 dwellings for development in the rural villages throughout the life of the Plan. The Amendment now allocates 115 dwellings to the same villages. As there is no demonstrable need for large scale development in Blakedown, or in the rural villages of Wyre Forest, this development is purely to help pay for the car park. Under the National Policy there has to be compelling evidence for Green Belt land to be used for car parking. No such compelling evidence has been seen.</p> <p>Were such development to be permitted, there is a real danger that permission could not be refused were developers to acquire other fields (such as the one on the opposite side of the A456 to this proposed development) and were either or both such developments to take place, the villages of Blakedown and Churchill would be just one hill away from the urban sprawl of Hagley.</p> <p>Whilst the field under discussion is not an SSSI the stream at the far end of the field does feed into pools and brooks lower down stream which are SSSIs at Hurcott Pools. The impact of any development would be bound to have an adverse effect on the watercourse, its habitats and the habitation afforded to birds, mammals and plants in a broad band to either side of the stream. This area again forms a buffer between the villages and the development of Hagley and should and must be protected.</p> <p>Given the discrepancy between the identified needs for an additional 10 parking spaces and the proposed provision for the area of 260 places, could there not be at least a staged introduction of, say, 10-20 places, which could be monitored before spending well over £1m on a car park which people can't get to or won't want to pay for.</p> <p>Whatever development is finally approved, we would wish to see clear proposals to ensure sufficient screening is in place, lighting is not obtrusive and noise will be kept to a minimum and UNDER NO CIRCUMSTANCES should there be interference with the precious Green Belt which presently protects the rural nature of our villages.</p>			
Lorraine	<a href="#">ALPPS55</a>	Policy	Object		No	No	Justified	I consider the Plan to be ill-judged essentially because of the lack of	I strongly believe that	No	

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Shade		AM36.11					Consistent with National Policy	<p>improvements to the local transport infrastructure.</p> <p>The intention appears to be to put these Car Parks on a busy two way narrow road that is already carrying 450 cars an hour all day. The A456 will I imagine be the main route to the Car Parks, however some commuters from the new developments will attempt to access the area using the narrow rural lanes through Churchill. This will be extremely dangerous for walkers and Horse Riders who currently use many of the single track lanes.</p> <p>I find it difficult to imagine what Station Drive will be like during the two main rush hour periods during the day when School Children from the Secondary Schools in Hagely and Kidderminster are set down and picked up on a daily basis. Later when the commuters return home Station Drive will be frequently jammed up as the trains arrive and leave.</p> <p>I surprised the sudden need for extra parking has arisen my understanding was that originally some 10 new parking spaces were required and then last year that had risen to 80 spaces and Station Yard was introduced The only explanation I have heard is the failure to include an upper deck in Kidderminster Station Park, it seems outrageous shortfall has been passed on to Blakedown.</p>	<p>the Council should look at other possible sites outside of the Village boundary. My view is that a New Station and Car Park somewhere along the dual carriageway between Kidderminster and Blakedown could be a more suitable solutions than the current plan. Such solutions are used elsewhere, for example Warwick Parkway. The Infrastructure with some improvements would be far less destructive of Village life and a more comfortable solution. Obviously the loss of the Station would inconvenience some villagers but this could be avoided to an extent by converting it into an old fashioned Halt where a limited number of trains would stop during off peak periods. Also I would suggest improvements to the pedestrians and cycle paths out of the Village to the New Commuter Station.</p>		
Robert Campbell	<a href="#">ALPPS65</a>	Policy AM36.11 - WFR/CB/3	Object		No	Yes	Justified Consistent with National Policy	<p>I can understand the need for the Station Yard development (36.6) but not a large scale car park in a rural area. It would be far better to expand car parking in Kidderminster to serve an urban area with existing transport links to the station. The transport links to Blakedown are totally inadequate for a large scale development.</p>		No	

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								It would make more sense to further develop car parking at Kidderminster Station. A multi storey car park was originally planned and I'm at a loss to understand why this is not going ahead. The transport links to Blakedown are totally inadequate for the proposal.			
Sarah Pearson	<a href="#">ALPPS67</a>	Policy AM36.11 - WFR/CB/3	Object	No	No	No		<p>It goes against national planning policy framework where "established Green Belt boundaries should only be altered where exceptional circumstances are evidenced". The reported increases to rail travel appear to be inconsistent statistics not fully evidenced. A large proportion of rail travellers from Blakedown are school children and therefore the car parking provided on station yard is more than adequate. Commuters from new sites such as Kidderminster Lea Castle will cause dangerous levels of congestion on country lanes, of which many are walking routes for Blakedown school children.</p> <p>A need for a further 50 houses is not described in a survey for Blakedown's 'future needs'. Only 7 affordable and 18 market houses were needed. Ecological survey concludes that this is a "sensitive site of local wildlife" and is needed to buffer other building within the village.</p> <p>No building on the Green Belt site in Blakedown.</p> <p>I believe the needs, structure and important ecological and wildlife of the small village of Blakedown are being ignored to accomplish a rail strategy that is not based on how the station of Blakedown is actually used. A plan, totally out of proportion and scale to the size of Blakedown and its residents.</p>	No building on the Green Belt site in Blakedown.	No	
Gayle Perry	<a href="#">ALPPS78</a>	Policy AM36.11	Object		No		Justified Consistent with National Policy	<p>The infrastructure around the car park site is just not capable of carrying any increased traffic. I live in Curchill lane which will become a short cut for the car park at the station. The lane can not sustain the traffic. There are places where only one car can pass and there is no footpath for pedestrians/runners/cyclists/horses, all of which use the road now. The station has a level crossing which already causes problems with cars waiting to cross which would only be exacerbated by an increase of traffic. Village children use the station for school and the primary school children walk to school via the road. All of them will be affected by the increase in traffic. None of this would be a problem if the car park was to just serve the village but it obviously isn't! The village doesn't need 250 car parking spaces. As far as I am aware it was suggested that we need 10 more spaces. The spaces are going to encourage people to drive into the village from Kidderminster and Hagley. How can this be right? We are trying to cut back on driving and encourage use of public transport not make people drive further to a car park in a rural area!</p> <p>I am aware of the need for new housing generally throughout the country</p>	I assume that the Plan was originally compliant and sound before the amendments and so would revert to being compliant if removed from the Pre Submission plan.		

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								<p>but there has been no evidence of a need for housing in this area .Our facilities in the village are limited, just one small shop and a small school. No doctor, dentist or health care locally. To serve more housing we would need more local services and our Green Belt land would have to be used .</p> <p>We are incredibly proud of our village and its community. We care for the open spaces and keep them free from litter and care about our local wildlife. We are more than happy to share its paths and bridleways. Sadly a car park seems to be more important and our views not really taken into account.</p> <p>I would like to know the reasoning behind the plan for 250 car parking spaces. Where has this figure come from when only an extra 10 were required?</p> <p>If this does go ahead what are the plans for the extra traffic coming off the A456? Traffic lights causing congestion in the village, outside a primary school? Or nothing and we run the high risk of accidents trying to get across the road.</p> <p>How would this affect the very local residents? More noise, pollution,lights?</p> <p>What happens to the wildlife on the fields there? There are many species we can ill afford to lose.</p> <p>Consultation? Really? Little consultation as far as I can see.</p>			
Worcestershire Wildlife Trust  Steven Bloomfield	<a href="#">ALPPS102</a>	Policy 36.11	Comment	Yes	Yes	Yes		We note that this site falls adjacent to a Local Wildlife Site and that there are a number of important ecological receptors both within and near to the boundaries. With that in mind we are pleased to support sub-sections 2, 5 and 6, which relate to the protection and buffering of these features. We consider that these sections are key to making the policy consistent with national policy and in particular National Planning Policy Framework paras. 170, 171 and 175.			
Steve Colella	<a href="#">ALPPS157</a>	Policy AM36.11	Object	No	No	No		<p>The main objections in this section relate to transport planning and the failure of this resubmission to adequately address the lack of highways and transport infrastructure.</p> <p>This has resulted in unsustainable and unmanageable traffic congestion along the A456 and A491 in particular. Any proposed investment in travel by public transport is light on detail, light on alternative options and light on justification. As regards detail around previously published bypass for Hagley remains unchanged and as such objections from wider public stakeholders</p>		Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

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								<p>and BDC remain unanswered.</p> <p>Traffic flows through Blakedown along the two main carriageway are the busiest A roads in the County, with congested pinch points and Air Quality monitoring areas. The proposed Lea Castle and Kidderminster extension will undoubtedly add further unsustainable pressures to these factors.</p> <p>The resubmission now details investment in Blakedown and Kidderminster stations for extended car parking. Whilst this is a step to recognizing the need to remove private vehicle use off the roads it far too little. Added to this Kidderminster station proposals do not maximise the car parking potential to create this station as a park and ride similar to Warwick Parkway, Worcester, Stourbridge and Rowley Regis. The opportunity for a two story car park at Kidderminster seems to have been disregarded in favour of adding unsustainable pressure on Blakedown. Kidderminster is already a town centre, brownfield site whilst Blakedown is Greenfield. There is no evidence to say why a Greenfield site in Blakedown is favoured above an existing Brownfield site that has not demonstrated that its land use is efficient as specified in the NPPF. There are significant environmental qualities that exist at this site and as such no regard has been paid to safe guarding such sites in the WFDC Plan.</p> <p>The inclusion of 50 houses seems only to appease the car park owners in that the housing development will pay for the creation of the car park. The houses are therefore a false need based on economics and not the NPPF or the local adopted Neighbourhood plan.</p> <p>The A456 is currently over capacity therefore an integrated transport strategy should be to provide free parking and the cost collected through rail fares rather than to park charges, as is common with bus related Park and Ride Schemes.</p> <p>The pay to park in Worcestershire is at odds with free parking in the West Midlands thus further encouraging car owners to drive to free parking destinations.</p> <p>My view is that there is nothing in the resubmission that makes the Plan safe nor does it address the main objections in the original plan consultation.</p> <p>There is publically available traffic flow data related to the A456 and A491. This shows what everyone knows is that the A456 is operating over capacity and is the busiest A road network in Worcestershire which effectively runs along large sections of single carriageways.</p>			argument.

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								<p>Additional housing will not be mitigated by additional station car parking. Whilst welcome this must be regarded as only one element of an integrated transport strategy. This has been under invested in and there is a total lack of investment in the LTP4.</p> <p>A by-pass that takes traffic away from the A456 and Norton Road to Stourbridge is needed towards the M5 to create one or two additional junctions is the only solution to the County's problem.</p> <p>As Birmingham and the Black Country are significant growth points commuter traffic is likely to continue to grow putting further pressures on the carriageways that feed the MUAs.</p> <p>A solution must be found in order for WFDC planned growth to be sustainable and for its development plan to be seen as safe and justified.</p> <p>This solution would be a review of the identified development sites in favour of sites closer to the M5 and further away from the a456 corridor.</p>			
Neil Rowlinson	<a href="#">ALPPS84</a>	36.10 WFR/CB/3	Object	No	No	No	Justified Effective Consistent with National Policy	<p>The evidence base for the Plan is not reliable nor has been appropriately tested.</p> <p>The Scheme does not comply with national planning guidelines:</p> <ul style="list-style-type: none"> <li>• A Major Development that has been given last minute consideration and lack of proper Consultation</li> <li>• Proper cooperation has not been undertaken with adjoining authorities (Bromsgrove and Wychavon) to create a combined strategy to deal with infrastructure issues relating to rail use and also the A456, A450 and congestion issues such as in Hagley</li> <li>• Blakedown has a very limited local Housing Need not what was suggested in the Plan</li> <li>• There is not the need for car parking on the scale the Plan indicates based on either Blakedown and its surrounding area (previous data identified requirement for 10 additional spaces at Blakedown, far less than the 250) or even growth across projected across Wyre Forest.</li> <li>• The Scheme will cause over intensification of use and loss of amenity to neighbouring residents</li> <li>• Exceptional circumstances have not been shown for the removal of the land from Green Belt, currently an arable field buffering Blakedown from Hagley along the A456 transport corridor.</li> <li>• The Plan contradicts the previous 2017 WFDC Green Belt Review Document</li> </ul>	<p>If there is a need for more railway car parking for Wyre Forest then Kidderminster is where it is needed especially to provide access from the other population centres of Stourport on Severn and Bewdley, using possible unallocated Brown Field sites.</p> <p>A more integrated Public Transport infrastructure development is called for linking key locations with the Railway stations, not more car parks and increased road traffic movements that defeats any gains being made.</p>	No	

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								<p>Traffic movements will cause queuing on the A456 and also at the railway level crossing at the station.</p> <p>Potential traffic problems accessing via narrow country lanes.</p> <p>Other access roads via A and B roads also very congested during peak times.</p> <p>This Plan will add to traffic on the busy A456 and other narrow lanes within Blakedown causing additional congestion at peak times. Peak times will coincide with children walking to primary school and walking to the station to travel to secondary school. The footway over the railway crossing is narrow and slippery when wet.</p> <p>Increased air pollution for local residents caused by additional traffic movements.</p> <p>Noise and light pollution for residents including early in the morning and late at night.</p> <p>Pedestrian access from car parks for Birmingham bound trains requires using the level crossing (narrow especially with vehicle movements).</p> <p>Blakedown is not as sustainable as suggested with a limited small shop and nor health care nor a Secondary School.</p> <p>Adverse effects on local wildlife, ecology and watercourse (currently hosts White Clawed Crayfish and Great Crested Newts) risking damage to the wildlife corridor along the watercourse.</p>			
Primrose Coley	<a href="#">ALPPS5</a>	Policy AM36.19	Object	No	No	No		<p>Land taken out of the Green Belt (proposal) in order to build houses and a large car park at Blakedown Railway Station. Blakedown has already submitted the required quota of new housing.</p> <p>A large carpark will attract more cars from outside the village near to a busy main road and the village Primary School. Local lanes will be used as rat-runs even more than they already are. Blakedown already has a parking problem caused by commuters using the railway station who don't wish to pay for their parking. If a charge is set for parking on the proposed car park, this will surely lead to displacement parking elsewhere in the village. Just invest in better public transport to take the cars off the road instead, not increase the pollution.</p>	LISTEN TO YOUR RATEPAYERS FOR A CHANGE..... The above was proposed as an after thought. As I understand it, our parish councils were not consulted on the above proposal. But, presented with it after the goal-posts were moved. IS THIS DEMOCRACY??	No	
Marmaris	<a href="#">ALPPS11</a>	36.19 Land	Object	No	No	Yes	Positively Prepared	We support this proposed allocation in principle, subject to the required	i. The end of the	Yes	The nature



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Investments Ltd.  Colin Griffiths		off Station Drive, Blakedown WFR/CB/3					Justified Effective	<p>amendments within the policy. The site is eminently suitable for development as proposed and is not required to remain within the green belt so as to protect any of the purposes of allocating land within the Green Belt. The suitability of the site for the development proposed is set out in more detail in our earlier representations.</p> <p>The housing will benefit Blakedown by providing continued choice in the local housing market. The inclusion of affordable housing will support local families in housing need. The station related parking will remove on street parking which exists at present, and support the aims of the plan to encourage a transportation shift away from the private motorcar. The required wording amendments are as follows,</p> <p>i. The end of the second sentence of AM36.19 "(A456 Birmingham Road)" should be added after "bus stop". This is required to achieve greater clarity.</p> <p>ii. The first line of the policy should have "The parcel of' deleted, so the Policy begins "Land is removed..... ". This is required to achieve greater clarity.</p> <p>iii. Point 6 of the policy should be reworded to state "The development should seek to retain and protect the mature trees on the Station Drive frontage where possible. Where they can be retained their canopies should be kept free of lighting for ecological reasons". This will give the Policy the required flexibility to respond to the detailed stages of scheme preparation if required.</p> <p>iv. Point 7 of the policy "(alongside the station platform)" should be added after "boundary of the site". This is required to achieve greater clarity.</p> <p>v. AM36.21 the final sentence should be reworded to state "Housing development on the site would help towards meeting the future housing needs in Blakedown village". This is required to achieve greater clarity.</p> <p>In essence therefore the policy is sound in its approach to the removal of this Green Belt site and its allocation for development. The removal of the site from the Green Belt is appropriate and no unacceptable harm is caused to the 5 purposes of green belt notation.</p> <p>The development of the site assists the strategy and objectives of the Plan in two regards, providing the opportunity for station related car parking and assisting to meet housing needs in Blakedown. The wording of the policy however needs to be amended as set out above.</p>	<p>second sentence of AM36.19 "(A456 Birmingham Road)" should be added after "bus stop". This is required to achieve greater clarity.</p> <p>ii. The first line of the policy should have "The parcel of' deleted, so the Policy begins "Land is removed..... ". This is required to achieve greater clarity.</p> <p>iii. Point 6 of the policy should be reworded to state "The development should seek to retain and protect the mature trees on the Station Drive frontage where possible. Where they can be retained their canopies should be kept free of lighting for ecological reasons". This will give the Policy the required flexibility to respond to the detailed stages of scheme preparation if required.</p> <p>iv. Point 7 of the policy "(alongside the station platform)" should be added after "boundary of the site". This is required to achieve greater clarity.</p> <p>v. AM36.21 the final sentence</p>		of our representations require appearance and participation in round table sessions regarding housing strategy, Green Belt release and Blakedown.

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									should be reworded to state "Housing development on the site would help towards meeting the future housing needs in Blakedown village". This is required to achieve greater clarity		
Carol Croxford	<a href="#">ALPPS7</a>	Policy AM36.11	Object	Yes	No	Yes	Positively Prepared Justified Effective Consistent with National Policy	Turning Blakedown into a railway hub for the area will increase traffic on an already busy main road. This will present a serious danger to families crossing the A456 to enter Blakedown Primary School whose pupil numbers are going to increase if the extra houses are built.  We already have new houses off Belbroughton Road and do not need any more.  The number of parking spaces is clearly aimed at people from outside the village, especially the Stourbridge Road/Cooley side again increasing traffic on roads unable to cope and incapable of expansion.  I am also very concerned about the proposed development off the A456, opposite Husum Way. This appears to be a large development destroying valuable countryside and increasing the load on Kidderminster's already creaking infrastructure. A primary school is promised but what about the huge demand on local GP surgeries, roads and hospitals - the latter cannot cope with the present population.	The plan to create car parking spaces in Station Yard is sensible and utilises a brown field site. It will not attract too many extra cars and its impact on the surrounding area will be minimal. The Green Belt will not be affected. This part of the plan should be retained and the rest disregarded.	No	
Campaign to Protect Rural England  Peter King	<a href="#">ALPPS15</a>	Policy AM36.11 Land off Station Drive Blakedown WFR/CB/3	Object		No		Justified Effective Consistent with National Policy	We welcome the proposed Blakedown Station Car Park in principle as a means of providing more Park and Ride parking for the Kidderminster to Birmingham line, but object to the housing element of this. Blakedown has recently had what was an Area of Development Restraint released and built upon. Any further housing there should be limited to what is required for Local Needs (not including demand from people moving in from elsewhere).  See those in our objection to policy AM6A. We remain of the view that the Transport Assessment of the impacts of the Plan is inadequate and will impose unacceptable burdens on the road infrastructure of adjacent areas (beyond the district boundary). The amendments to the Plan do not change that.	Delete the provision for any housing on this site.  It is likely that only part of the site will initially be needed as a car park. The remainder should be should be retained in agriculture and safeguarded specifically to be an extension to the car park, when required. It is vital that this is retained as there is no	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.

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									land available near any other station on this railway line (save possibly at Hartlebury, where there are few trains).		
Mary Powell	<a href="#">ALPPS29</a>	Policy AM36.11 Land off Station Drive Blakedown, WFR/CB/3	Object	No	No	No		<p>The amount of car parking is completely over the top and way over the original ten places originally needed and stated.</p> <p>Blakedown is a small village with an already busy road running through it. The traffic would considerably increase in an area where there is nursery and primary traffic/ children and parents needing to cross safely.</p> <p>Other children also travel via train to schools in Hagley.</p> <p>The parking in Hagley is not used as people do not want to pay . This is bordering on beautiful Green Belt countryside and we understand that hardly any consideration has been given to expanding kidderminster which is much more of a wide hub to travel than Blakedown.</p> <p>Why not park and ride in some brown belt area? Or expand the Kidderminster site?</p> <p>According to recent reports the homes are not required as Blakedown has already had two major developments in recent years. Other than for making money , what reason is there to add to housing unnecessarily?</p> <p>We strongly oppose these plans.</p>		No	
Steve Fletcher	<a href="#">ALPPS32</a>	Policy AM36.11 Land off Station Drive Blakedown, WFR/CB/3	Object		No		Justified Consistent with National Policy	<p>I do not believe this development is justified on the grounds that the existing Neighbourhood Plan accounts for small scale development within the existing village boundary. Taking areas of Green Belt land for large scale development and the creation of car parking facilities is completely inappropriate. The sites already identified for development will allow for considered growth whilst also preserving the rural nature of our village. The Housing Needs Survey for Churchill and Blakedown did not reveal any identified need for large scale development in Green Belt land surrounding our village.</p> <p>As a resident in a property immediately neighbouring the proposed development and a father of a child who uses the existing infrastructure to travel to school I have serious concerns regarding travel congestion, access and egress to the proposed site and for the safety of residents and members of the general public. There will be a substantial increase in traffic and vehicular movements in the area around the station that will have a prolific</p>	The previous Plan was presumably compliant and sound before the amendments were made including the development of the Green Belt land off Station Drive. My suggestion would be that this amendment be removed from the plan due to undoubted strong objection to the development on the grounds that it is not	No	

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								<p>and catastrophic impact on the quiet residential streets of Lynwood Drive and Roxhall Close. There will also be substantial impacts on already busy infrastructure of the A456 and Belbroughton Road. There is substantial risk of fatalities as the proposals as prepared will create a very dangerous mix of pedestrians and vehicles at very busy times of the day. The junctions entering the site off the A456 will disrupt the traffic flow through the village with the highway already carrying a substantial number of vehicles including very large commercial vehicles. Speed tube data of vehicle movements through the village confirms there are a significant number of vehicle movements which do not comply with existing speed limits and this requires regular monitoring involving a mobile speed camera which presently parks at the junction with A456 and will on occasions substantially reduce the visibility for vehicles entering and leaving the proposed development.</p> <p>We are a community that support the travel to school on foot - the school in recent years has expanded its PAN to 30 pupils per year group which I estimate will take pupil numbers to somewhere in the region of 200-210 many of whom walk to school in the area proposed for development.</p> <p>There are a number of rural lanes off the main arterial roads that provide access into the village but many of these provide very low grade capacity with many narrow / one car wide which will create for very substantial congestion and again a risk of safety for all road goers in the area as well as pedestrians.</p> <p>The station is served by a level crossing providing for a separation of rail and road / pedestrian traffic. The car park will involve a substantial increase of vehicle movements over the level crossing at busy times of the day which is going to exacerbate traffic congestion when the barrier is down - c10 train movements per hour allowing for trains travelling in both directions at rush hour, some which do not indeed stop at the platform to allow the access and egress of pedestrians. The barrier is also used to separate freight trains from the passing public which will increase the train movements.</p> <p>Access to the Birmingham platform will be on the opposite side to the car park which will create passenger safety issues for parking members of the public who will have to use the level crossing for access to the platform.</p> <p>Waggon Lane, Churchill Lane, Mill Lane and Stakenbridge Lane (including the cross roads which is an accident blackspot) are all representative of local lanes which are completely inappropriate for the passage of vehicles travelling towards the proposed station car park. If they continue on Stakenbridge Lane to the A456 and attempt to turn right towards Blakedown this again presents an area of substantial traffic congestion and a scene of numerous accidents.</p> <p>The station car parking needs at Blakedown have been discussed for numerous years. The identified need for Blakedown has been for a further 10 spaces in all documents relating to the plan until July 2019. SLC have prepared research which has now encouraged the number to suddenly</p>	<p>justified or consistent with national policy. The pre-submission plan will then revert to being compliant and sound.</p>		

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								<p>increase to 250 places - in the absence of understanding the parameters of their brief against which their report was prepared, or the ability to interrogate the assumptions and modelling that has been used to generate this substantially different requirement to all perceived experienced views, I have serious concerns as to the integrity of the evidence informing the policy and therefore do not consider this response to be proportionate or required. We already experience modest congestion in the area as a result of on street parking - which has been assisted through the introduction of double yellow lines ensuring that on street parkers are more considerate in where they leave their vehicles. With the car park being a pay to park I have significant reservations as to whether the car park will be used at all with what space is left on the highway being used as on street parking - local stations have already introduced parking schemes recently which has reduced the utilisation rate of the car parks concerned driving vehicles into on street parking (Hagley being a very good example of what to expect.)</p> <p>WFDC has recently refused an application for change of use of a residential property to a mixed residential and business use in Roxhall Close, in part due to the increased number of vehicular movements into a residential street. This property is responsible for c50% of the on street parking in the area and it is perverse that having upheld objections to this change of use that WFDC is seriously contemplating introducing a substantial (multi 100% increase) in vehicle movements into these same neighbouring streets.</p> <p>Existing traffic data in the region would suggest that there is very low inward migration into Wyre Forest with low projected population growth of c4.9% to 105,300 by 2036. Of these numbers I believe it is considered that 60.8% can be expected to be economically active. 40.9% will work outside of Wyree Forest requiring access to travel infrastructure 5.4% commuting to Birmingham and 5.5% to Worcester as reported by the Housing Needs Objective Assessment in 2017. These projections would appear at odds to the projections from SLC report. To further compound the inadequacy of the assessments regarding the needs for substantial parking at Blakedown station it must also be considered that the working population is changing the way it works with a substantial growth in agile working enabling people to work from home with improved IT and communication networks. Congestion schemes and charges in large conurbations like Birmingham are encouraging more and more employers to provide flexibility to their employees. They will not need the train.</p> <p>The updated plan is not consistent with National Policy - the original plan allocated 65 dwellings for development in the rural villages throughout the life of the plan. The ammeded plan now allocates 115 dwellings to the same villages. There is no demonstrable need for large scale development in Blakedown or in the rural villages of Wyre Forest. The development of Housing in the area off Station Drive is merely to help pay for a car park that is not required and fundamentally unsafe. There is no compelling evidence to</p>			

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								<p>suggest that the use of Green Belt land and a re-designation of its use is required or necessary.</p> <p>Land within the proposed boundary of development is designated as an Ecological site of significance with various species and habitats that will be affected by this needless development.</p> <p>The development of Green Belt land will present loss of the Green Belt wedge that separates the village communities from each other. There are plans for sprawl from Kidderminster and from Hagley that will erode any separation of these areas with Green Belt land.</p> <p>Rail data is flawed with a significant number of passengers travelling from Blakedown being school children travelling to schools in Hagley. They do not drive cars and so will not require car parking.</p> <p>Waste of public funds.</p> <p>Excessive development of a car park that is not required.</p> <p>Development of housing to pay for the carpark rather than reflecting local housing need.</p> <p>The car park will become home to social nuisance and crime which will be hard to police. Anti social behaviour will be encouraged and will provide a nuisance to local residents.</p> <p>Loss of local Green Belt will fundamentally lose the spirit of the village and as a resident of the community that will be a great shame.</p> <p>Lighting / access and egress / substantial traffic congestion and risk of fatality and injury make this a completely inappropriate area for development.</p> <p>The car park will be a white elephant with further pressure onto on street parking which is not policed.</p> <p>There has been extremely limited consultation on these amendments to the local plan. There was no mention of this proposed development when the issues and options consultation took place in 2015, nor in the Preferred options consultation in 2017. Ditto in the pre-submission plan consultation in October 2018. This is a very late development which I feel has been rushed through at the last minute with presumably very little thought - unless that is it has been considered previously and not published. Consultation sessions when hard working residents are at work or in school holidays away with their families does not adequately discharge the authorities from their legal obligation to consult. Those using the station for work presently have also not had the opportunity to join the consultation process as by definition they would be at work in Birmingham or elsewhere while their cars are parked on the streets of Blakedown when the consultation events have taken place.</p>			
John Lorton	<a href="#">ALPPS34</a>	Policy AM36.11, Land off Station	Object	No	No	No	Justified	The local plan in 1993 only stated that housing was to be build on the old nursery on the Belbroughton Road. planning for 42 houses.	They now wish to put a car park for 107 car spaces and 50 houses off station drive on		

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		Drive, Blakedown own WFR/CB/3							land which is Green Belt.		
Gail Harrison	<a href="#">ALPPS45</a>	Policy AM36.11 Land off Station Drive Blakedown, WFR/CB/3	Object		No	Yes	Justified Effective Consistent with National Policy	<p>The site is not large enough to accommodate the housing and parking as it is adjacent to the Churchill and Blakedown Valley Local Wildlife Site where Ecological Surveys indicate that there should be a buffer area between such sites and development.. This would reduce the land available to approx. 1.5 hectares. There are no exceptional circumstances for altering the Green Belt boundaries. Under the Neighbourhood Plan there is provision for small scale development within the village boundary which will preserve the nature of Churchill and Blakedown and there is no requirement for as many as 50 additional houses in Blakedown. In the first Draft Local Plan the Wyre Forest District Council identified sites of housing sufficient to meet the government's requirements up to 2036 and 65 new houses were considered necessary in rural villages throughout the life of the Plan. In the 2018 original Draft Plan the site at Station Yard was identified as possibly providing 80 car parking spaces for the station, despite rail passenger surveys indicating only a need for ten additional spaces. The latest suggestion for the land at Station Drive proposes an additional 170 spaces. There is no evidence of traffic surveys to establish how people using the car park will access the area. The Birmingham Road/Station Drive junction is already congested at peak times and is particularly dangerous when school children are approaching the junction. From the Stourbridge Road, the approach roads into Blakedown via Waggon Lane, Churchill Lane and Mill Lane are all narrow country lanes where passing vehicles are already a problem. When the level crossing barrier is down access to the car park will be restricted and will result in traffic queuing down Mill Lane. Government policy is to reduce emissions and car use, so there is no justification for encouraging people to drive. No evidence as to why the Green Belt should be released for car parking. No reason to assume people will pay to park in the car park. No realistic surveys to indicate where the additional train passengers will come from. At peak times the train are already full when arriving in Blakedown and the plan has not referred to any surveys with the train operators regarding additional services on the line.</p> <p>Blakedown and Churchill are rural communities with limited facilities for the community. There is a small well supported primary school which could not accommodate the additional children from the proposed new houses that may require school spaces. There are no medical facilities in Blakedown or Churchill and the doctor practices in Kidderminster and Hagley are already full. The additional houses will create a need for a review of village amenities. The infrastructure on the approach roads to the station is inadequate for the additional traffic that will be generated by people travelling to Blakedown to</p>	The October 2018 Local Plan was considered legally compliant and sound and there is no justification for changing that.	No	

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								park. The logical stations for people to be encouraged to use are Stourbridge and Kidderminster. If areas such as Offmore and Lea Castle are to be developed for housing, then adequate and sustainable shuttle bus services should be provided at those locations for all residents.			
Patrick and Barbara Cox	<a href="#">ALPPS47</a>	Policy AM36.11	Object	No	No	No	Consistent with National Policy	In our opinion the impact of the probable increase in traffic onto a very busy A456 has not been considered. The safety aspects arising could be horrendous. Also the Green Belt (theft) is totally unjustified.		No	
Jillian Rowlinson	<a href="#">ALPPS87</a>	AM 36.10 FR/CB/3	Object	Yes	No	No	Justified Effective Consistent with National Policy	<p>The Scheme does not comply with national planning policy:</p> <ul style="list-style-type: none"> <li>This is a major development change without full Consultation with local residents presented in isolation from the bulk of the Plan.</li> <li>There has not been adequate cooperation with adjoining authorities (Bromsgrove and Wychavon) to create a combined approach to the infrastructure problems around rail use and traffic on the A456, A450 nor growing congestion issues such as in Hagley.</li> <li>Blakedown has a very limited local Housing need only a handful per year not 50 in one go not justified in the Plan documentation nor the mix of housing considered properly.</li> <li>There is not the need for car parking on the scale the Plan indicates based on either Blakedown and its surrounding area (previous data identified requirement for 10 additional spaces at Blakedown not 250).</li> <li>The Scheme will cause over intensification of use and loss of amenity to neighboring residents in particular but also negatively impact the whole village.</li> <li>Exceptional circumstances have not been given for the removal of the land from Green Belt, currently it is an arable field buffering Blakedown from Hagley along the A456 transport corridor and contradicts the WFDC Green Belt Review of 2017.</li> </ul> <p>Traffic movements will lead to problems on the A456 and also at the level crossing with queues resulting in blocking the junction between Station Drive and the A456 plus other issues for traffic accessing via narrow country lanes into and through the village. This would make it not effective at improving transport.</p> <p>Other access roads via A and B roads are also very congested during peak times.</p> <p>Increased air pollution for local residents, children in the Primary school and those walking caused by the additional traffic movements.</p> <p>Noise and light pollution for residents including early in the morning and late</p>	<p>More than sufficient Station Car Parking for the Blakedown and surrounding area can be achieved using the Station Yard Site without the need to take land from the Green Belt.</p> <p>There are several other possible sites within Blakedown that can easily meet the accepted projected housing needs without using Green Belt land.</p>	No	



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								<p>at night plus possible anti-social behavior/drug dealing.</p> <p>Pedestrian access from car parks requires using the level crossing (narrow especially considering more vehicle movements).</p> <p>Blakedown is not as sustainable as suggested with only very limited facilities (a small shop) that do not include health care nor a Secondary School (relies on schools elsewhere that will necessitate even more transport requirements and probable congestion especially in Hagley).</p> <p>Adverse effects on local wildlife, ecology and watercourse risking damage to the wildlife corridor along the watercourse that links to an SSSI.</p> <p>If there is a need for more railway car parking for the Wyre Forest District then Kidderminster is where it should be located to better serve Kidderminster, Bewdely and Stourport. It should address the local need not just tick a box for total numbers across an entire district.</p>			
Christopher Perry	<a href="#">ALPPS94</a>	Policy AM36.11 Land off Station Drive, Blakedown WFR/CB/3	Object	No	No	No	Justified Effective Consistent with National Policy	<p>This policy does not comply with National Planning Policy</p> <ul style="list-style-type: none"> <li>· The evidence base is unreliable and is untested</li> <li>· Kidderminster Station is more sustainably located and offers better services than Blakedown.</li> <li>· The focus of investment and development should be in Kidderminster.</li> <li>· Building more car parks leads to more cars on our roads and conflicts with the UK government policy of becoming Carbon Neutral by 2050.</li> <li>· Investment in connecting public transport services is required, not park and ride stations in the Green Belt</li> <li>· The Local Plan is not sustainable</li> <li>· Blakedown is not a sustainable village - it only has one small shop, 2 pubs and a small primary school. It has limited employment, limited bus services, and no healthcare services.</li> <li>· Exceptional circumstances have not been shown for removing this land from the Green Belt</li> <li>· The Plan contradicts WFDC's Green Belt Review (2017)</li> <li>· This proposed policy is a major development that has been added into this plan at the last minute consideration and there has been a complete lack of effective consultation Consultation.</li> <li>· It seems that proper cooperation has not been undertaken with adjoining authorities (Bromsgrove and Wychavon) to create a combined strategy to</li> </ul>	Withdraw this proposed policy	No	

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								<p>deal with infrastructure issues relating to rail use and also the A456, A450 and congestion issues in Hagley.</p> <ul style="list-style-type: none"> <li>· Blakedown does not have the Housing Need suggested in The Plan</li> <li>· Blakedown has a limited local Housing Need but not such required to make the car park viable</li> <li>· The proposed scheme will cause over intensification of use and loss of amenity to neighbouring residents. It will introduce light pollution, noise pollution and has the potential to introduce anti-social behaviour</li> </ul> <p>Development of an arable field/Green Belt is not justified when there are clearly alternatives that could be delivered to significantly increase car parking spaces at Kidderminster station through the provision of decked car parking provision (as has been successfully introduced at stations such as Solihull).</p> <p>This proposed development is likely to have adverse effects on local ecology and watercourses</p> <p>The Churchill &amp; Blakedown Neighbourhood Plan has been ignored</p> <p>The consultation has been a sham with these proposals added in very late into the local plan development process and the consultation events being held either during the summer holiday period or at times when economically people are out at work.</p> <p>The process of submitting comments appears to have been designed to actively discourage comments/objections to proposals.</p>			
Douglas Wood	<a href="#">ALPPS107</a>	Policy AM36.11 WFR/CB/3	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>The plan contradicts WFDC Green Belt Review (2017). A major development that has been given last minute consideration and lack of proper consultation. Proper cooperation has not been undertaken with adjoining authorities to create a combined strategy regarding infrastructure re rail use, A456, A450.</p> <p>Blakedown does not have the housing need suggested in the plan or to make the car park viable.</p> <p>Proximity to level crossing and danger to both cars and pedestrians.</p> <p>The road networks to reach Blakedown station are already congested at peak</p>	<p>Proper consultation with the local community. Use of an evidence base that considers - Highways, pollution, ecological impact, pedestrian safety.</p> <p>Network rail needs to be consulted on the impact of additional</p>	No	

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								times.  WFDC failed to deliver the proposed multi storey car park at Kidderminster Station.  Junction at A456/Station Drive unsuited to the proposed extra volume of traffic.	use of level crossing.		
Valerie Wood	<a href="#">ALPPS109</a>	Policy AM36.11 WFR/CB/3	Object		No	Yes	Justified Consistent with National Policy	1) Neighbourhood plan - states small scale development in village boundary and rural exception sites. Development not justified.  2) Churchill and Blakedown (Housing Needs Survey) no identified need for large scale development in Green Belt land surrounding village.  3) No study made regarding increase in traffic - A456 already dangerous with heavy lorries, especially at school times, involving children walking to school and pedestrians etc. Parking at station would be problematic via Waggon Lane, Churchill and Mill Lane.  4) Station car parking. Needs attention on a smaller scale - Policy 36.6A - AM 36/10-FRCB2 is ample enough.  5) Proposed development of 50 homes is an excuse for to help to pay for the car park.  6) Green Belt land must be preserved. Use of it exceeds housing needs for Blakedown in the Green Belt field behind the telephone exchange in Station Drive.  7) Insufficient road infrastructure to deal with additional traffic through Churchill Lane, Wagon Lane and Mill Lane and present road parking for local residents will continue to be very problematic.  Plan was presumably compliant and sound before amendments were made to the policies.  If removed the pre-submission plan could/will be reverted to being compliant and sound.  Major concerns;  1) Residents in Lynwood Drive and Station Drive, sever disruption with proposed car park and size of it. 30 spaces already approved. Spending of	Plan was presumably compliant and sound before amendments were made to the policies.  If removed the pre-submission plan could/will be reverted to being compliant and sound.	No	A legally qualified person needed to represent the interests of residents.

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								<p>£1m on a car park is not justified.</p> <p>2) Reassurance needed about lighting and noise to be kept to a minimum.</p> <p>3) Environmental concerns need major attention, especially if Green Belt is used for building houses. How will insurance be given regarding protection of Local wildlife site and stream feeding into the SSSI at Hurcott Pools.</p>			
Deirdre Brookes	<a href="#">ALPPS111</a>	Policy AM36.11 WFR/CB/3	Object		No	Yes	Justified Consistent with National Policy	<p>This area is already congested and more traffic will inevitably cause a build up of traffic possibly reaching the main road A456. I fear for the safety of children going to and from school and crossing the level crossing as its barrier is constantly up and down.</p> <p>The whole project must be thoroughly thought out before spending a considerable amount of money to no avail. Commuters should be encouraged to park in Kidderminster as the parking charge is the same as at Blakedown.</p>		No	
Lesley Brown	<a href="#">ALPPS52</a>	Policy AM36.11	Object	Yes	No	Yes	Justified Consistent with National Policy	<p>The proposed housing and car park development on this land is not consistent with the Housing Needs Survey for Churchill and Blakedown. On this basis it would not be justifiable to allow development on Green Belt land.</p> <p>The proposed 50 house development and extra car park spaces for rail commuters will have a devastating effect on a rural village that is already breaking under the strain of increased traffic flow, not only on the A456 but also on the smaller roads that lead into Blakedown.</p> <p>I agree that some extra parking is needed for Blakedown station, but this could be more than adequately provided by the proposed car park development in Station Yard that also forms part of the Local Plan.</p> <p>The scale of car parking development in the field off Station Drive is disproportionate to the needs of local people and will have a large negative impact on people already living in the village. I live in a property that fronts onto the A456 and already experience considerable delay and difficulty in leaving the property, not just at the busiest times but fairly consistently throughout the day. This will get appreciably worse if the proposed housing/car park development goes ahead. I believe this development will change the character of Blakedown in a very detrimental way, and that the village will lose the last vestiges of its community feel. I have grave concerns over the safety of children crossing the road to attend Blakedown Primary School, and over the increased congestion along the main road and at road junctions within Blakedown that will be caused by the extra traffic generated by the proposed development.</p>	<p>Abandon the proposal to build car parking and 50 houses on the site off Station Drive.</p> <p>The Local Plan was compliant and sound before these amendments were made to this policy, therefore by removing them, the Pre-Submission Plan will revert to being compliant and sound.</p>	No	

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								<p>The Housing Needs Survey identified that a further 10 car parking spaces were needed for the village, yet this has increased by a further 260 spaces, without any explanation or justification. Where is the evidence to support this increase? Where are all the drivers going to come from? The Housing Needs Objective Assessment in 2017 projected a modest population growth of 4.9% for Wyre Forest by 2036 of which 60.8% are expected to be economically active. Of these, almost 60% will work within Wyre Forest (most of which IS NOT served by any rail services that pass through Blakedown). Just 5.5% will work in Worcester, and 5.4% will work in Birmingham. Not sufficient to justify the massive expansion of parking at Blakedown that is being proposed.</p> <p>Regarding the proposed development of 50 houses - these are being posited as a way of clawing back some income to fund the car park. If, as argued above, the car park is not necessary, then the income is not needed.</p> <p>Additionally, the house building proposals are not consistent with National Policy. The original Plan allocated 65 dwellings to be built in the rural village throughout the life of the Plan. The Amendment (including the proposed 50 extra dwellings for Blakedown) now allocates 115 dwellings to the same villages. There is no compelling evidence that either these 50 dwellings or the additional car parking is needed.</p> <p>Abandon the proposal to build car parking and 50 houses on the site off Station Drive.</p> <p>The Local Plan was compliant and sound before these amendments were made to this policy, therefore by removing them, the Pre-Submission Plan will revert to being compliant and sound.</p> <p>I have doubts that people will be prepared to pay for car parking in Blakedown. Since the introduction of payment charges at Hagley station, the take-up of the parking facilities has dropped considerably. We could end up with car park deserts! (And 50 extra houses to 'fund' these deserts, the bulk of which were not ever identified as being needed.)</p> <p>Whilst I am in favour of encouraging people to use public transport, sustainability is undermined by requiring vastly increased numbers of people to drive into rural areas (like Blakedown) in order to access this public transport.</p>			
Matthew Kitching	<a href="#">ALPP54</a>	Policy AM36.11	Object	Yes	No	No	Justified Consistent with National Policy	This is not a small-scale development. Far reaching implications on schools, road use + doctors.	Whilst not a legal expert I am involved in Real Estate	No	

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								<p>Safety is therefore a concern. This is a rural village, not a heavily populated area with the appropriate infrastructure to support it.</p> <p>A large development was built on the nearby Belbroughton Road in the last 5 years. The impact still means 'the dust needs to settle'.</p> <p>I moved into the village 7 years ago. I have seen a large development on Belbroughton Road go up and several smaller ones. Quite simply, this is a rural village where what is being proposed will impact on safety (roads/schools) and lack of infrastructure to support a sharp increase in the number of people in the village.</p> <p>To allude to the train station needing a large car park is inaccurate. Predominantly the station is used by school children, who do not need cars. Most use Stourbridge station, much cheaper to commute and free parking. Any S106 or CIL contributions, it would make sense, from small scale developments should be used for a new car park of a much smaller area. Say 20-30 cars.</p>	<p>development. This village can sustain small scale development of up to 3 new units at suitable sites. But no more for this risk of saturation and lack of infrastructure to support. An appropriate S106 or CIL should form part of the planning. To then be invested locally.</p> <p>As a regular user of the train into Birmingham, most passengers go from Stourbridge as the the costs are much higher once out of the the zone system which stops at Stourbridge. 20-30 spaces at Blakedown would be more than sufficient.</p>		
Mary Macdiarmid	<a href="#">ALPPS56</a>	Policy AM36.11 Land off Station Drive, Blakedown WFR/CB/3	Object		No		Justified Consistent with National Policy	<p>The Neighbourhood Plan provides for small scale development which allows for growth but also protects the rural nature of the village.</p> <p>The need for station parking was identified as an extra 10 spaces which would be accommodated in the station yard.</p> <p>The plans for extra housing is not justified as the Housing Needs Survey for Churchill and Blakedown did not show any need for large scale development locally and seems to be purely to fund the parking for the station.</p> <p>The increase in traffic accessing the site using the rural roads (Churchill Lane, Mill Lane, Station Drive, Waggon Lane) is not practical due to the narrowness of some and an increase in traffic volume is sure to cause problems especially</p>		No	

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								<p>at Churchill crossroad which has seen many accidents over recent years.</p> <p>With parking for 260 vehicles this is a wide scale development on the Green Belt and is not justified.</p> <p>The Birmingham Road is very congested at peak times and access down Station Drive will add to that as well as causing safety issues for the many children who walk to the school.</p> <p>The frequency of the closing of the train barriers will also cause further congestion problems for access to the site from the other side of other housing development planned for Lea Castle and other sites.</p>			
James Harrison	<a href="#">ALPPS68</a>	Policy AM36.11 - WFR/CB/3	Object	No	No	No		<p>Need for a further 50 houses is not described in a survey for Blakedown "future needs"; in fact, only 7 affordable houses and 18 market houses identified.</p> <p>Ecological survey concludes that this is a "sensitive site of local wildlife" and is needed to buffer other building in the village.</p> <p>It goes against national planning framework where "established Green Belt boundaries should only be altered where exceptional circumstances are evidenced".</p> <p>The reported increase to rail travel appear to be inconsistent statistics that are not fully evidenced.</p> <p>A large proportion of rail travellers from Blakedown are school children and therefore the car parking provided on Station Yard is more than adequate.</p> <p>The road network of country lanes is not adequate for increase traffic from new sites at Lea Castle or Kidderminster, and will therefore cause dangerous levels of congestion along walking routes for children from Blakedown school and returning home from the train station.</p> <p>The needs, structure and the important ecological and wildlife of the small village of Blakedown are being ignored to accomplish a rain strategy that is not based on how the station at Blakedown is actually used or will be used by those living in the village.</p> <p>A plan which is totally out of proportion and scale to the size of Blakedown and its residents.</p>	No building on the Green Belt site in Blakedown	No	

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Antony Harrison	<a href="#">ALPPS66</a>	Policy AM36.11 Land off Station Drive Blakedown, WFR/CB/3	Object		No	Yes	Justified Effective Consistent with National Policy	<p>No exceptional reason for amending Green Belt areas and Green Belt land should only be released for exceptional circumstances which do not exist. Land is adjacent to Churchill and Blakedown Valley Local Wildlife Site and is not large enough to ensure buffer zone between that area and development. Environmental consequences of up to 250 additional cars a day (more if Station Yard is used for car parking) coming into a rural village. Completely against national policy and government directives to reduce car travel. Previous local plan identified housing needs and this proposal of 50 new properties exceeds predicted requirements. Roads infrastructure totally inadequate to cope with additional traffic, particularly through Waggon Lane, Churchill Lane and Mill Lane- all narrow country lanes. Trains area already full at peak times and there have been no consultations with rail network operators over managing additional passengers.</p> <p>Alternative electric bus services should be provided from new development areas to stations. Blakedown community facilities very limited and the school could no cope with additional pupils from 50 new houses. Traffic crossing the level crossing already causes congestion and is particularly dangerous when children are walking to school. The crossing is already classes as high risk by Network Rail. No space for additional or wider footpaths in the close proximity of level crossing. Visual impact of two level car parking provision in a rural location is unacceptable.</p>	Previous consultations on October 2018 local plan must have been legally compliant so no reason or justification for amendment now.	No	
Worcestershire County Council, Planning Economy & Performance Emily Barker	<a href="#">ALPPS115</a>	Policy AM36.11 Land off Station Drive Blakedown WFR/CB/3	Support					<p>We welcome the allocation of land for the further expansion of Blakedown station and associated car parking, in line with our recommendations. This reflects the opportunity that rail offers to mitigate existing and future generated demand on strategic highways corridors (especially the A456), enabling genuinely sustainable growth opportunities in the Wyre Forest.</p> <p>We regret, however, that other recommendations we made to ensure the plan is sound have not yet been addressed. As such, we wish to stress that - with the exception of the section titled 'Sustainable Transport', and subject to ongoing DtC discussions between WCC and WFDC officers - the comments submitted by WCC and dated 17th December 2018 remain extant and should be taken into account.</p>			
Sue Fowler	<a href="#">ALPPS163</a>	Policy AM36.11	Object	No	No	No	Justified Effective Consistent with National Policy	The proposed development is not compliant with the National Planning Policy Framework in that there is no identified urgent need for additional high density large scale housing development in Blakedown which would justify taking land out of Green Belt. The proposed 50 houses are to help finance the 170 space double deck station car park, which in turn has no sound justification other than that, despite redevelopment already in progress, no additional parking space has been provided at Kidderminster Station to meet possible future demand, and an arbitrary decision has been made to push this problem into Blakedown, making a 25 fold increase in the	Policy 36.6A Land off Station Drive, Blakedown should be removed from the Pre-Submission Plan. Should the proposed development of both car park and dwellings prove essential, the	No	



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								<p>current parking space provision. There has been no consultation on this policy - residents attending the consultation presentation on October 11 2019 in Blakedown were informed by a County and District Councillor that the outcome had already been decided, and the development will be going ahead.</p> <p>The complete disregard for safety evidenced by the proposal of hugely increased traffic movement (an additional 700 + traffic movements per day, with the majority in the rush hours) in a very restricted network of minor and residential roads adjacent to the highly congested Birmingham Road (A456) is of grave concern. The proposal would lead to a potentially lethal mix of cars, pedestrians and trains, exacerbated by schoolchildren crossing the Birmingham Road in both directions to access the primary school and the train station. The statement given at the consultation meeting was that 'Highways say it'll be fine'. That is an unacceptable trivialisation of the issue.</p>	issue can be addressed through a normal Planning Application, extraneous to the provisions of the Local Plan.		
Jemma Sherwood	<a href="#">ALPPS91</a>	AM36.11 WFR/CB/3	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>There are so many problems with this proposal that I struggle to know where to start and will try to group my objections as clearly as possible.</p> <ol style="list-style-type: none"> <li>1. The Churchill &amp; Blakedown Local Plan is being ignored in this proposal. There is no need for the kind of housing being proposed here.</li> <li>2. The land is <u>Green Belt</u>. How dare you reclassify our Green Belt to make a huge carpark that overtakes anything the village needs. You are pushing the perceived needs of a huge area in the Wyre Forest onto one small village in a move that will fundamentally change the nature of the village. People move to a village because it is, by nature, different to a town. To have our village flooded by the amount of traffic you are proposing, you are creating something that would not be out of place in a town but would be grossly out of place in a village. This is not acceptable.</li> <li>3. The evidence for this proposal is based around a perceived future need. This means therefore, you have no actual, proper evidence for the necessity of this proposal. Everything you propose is unreliable and untested. Such a dramatic change to a small village should not be carried out on an unreliable and untested evidence base.</li> <li>4. The Local Plan is not sustainable. It seems you have added this site in because you know that the proposed expansions on the east of Kidderminster and at Lea Castle are unsustainable. Therefore it seems you have decided to ruin Blakedown in order to justify expansions elsewhere.</li> <li>5. Kidderminster Station is a much better sustainable site for car parking. There is a reliable, regular transport network and a proper road network in and out. Neither of these things exist at Blakedown.</li> </ol>		No	

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								<p>6. Expecting people to drive to use a train (which is the only feasible option at Blakedown) flies in the face of the government’s national push for councils to provide genuinely useful public transport options, to reduce the number of cars on the road and cut emissions. Developments at Kidderminster, however, allow the Council to genuinely encourage reduced car use. By investing properly in a network of connecting transport services, rather than creating a park and ride on Green Belt, the Council can begin to be a truly sustainable one.</p> <p>7. The plan suggests that Blakedown has infrastructure suitable for the increase in footfall proposed. This is not true. Blakedown has one small shop, a couple of pubs and a small primary school. There is no secondary school, the bus service is extremely limited, there are no healthcare services, there is no petrol station. There is barely any employment (it is a small, residential village). It is the incorrect place for a large car park at the station. Kidderminster, however, has all the things mentioned above and more. It is the correct place for a large carpark and people would <i>expect</i> such a thing there.</p> <p>8. The effect of 170 car parking spaces at a small village (as well as the 80 proposed at Callow Yard) is hugely disproportionate to the corresponding effect of the same number of spaces in a large town.</p> <p>9. The local Secondary School (Haybridge High School) is already over-subscribed and by putting such a large development in the village you risk the school places of others who are further away as the crow flies.</p> <p>10. This plan does not comply with national planning policy, since the removal of this land from Green Belt requires exceptional circumstances. There are no such exceptional circumstances.</p> <p>11. The plan contradicts WFDC’s Green Belt Review (2017).</p> <p>12. For such a major development, consultation was last-minute and not proper. There was one consultation held on a weekday at a time when most residents were still at work and could not attend. This is not acceptable and feels underhanded and deliberate. The Council staff who attended the consultation were not properly briefed as they were unable to answer a single question, constantly directing us to “read the proposals”. This is, therefore, not a consultation that is accessible to all, especially not to the most vulnerable of residents. It required a high amount of reading and specialist knowledge to understand the documents provided.</p> <p>13. Blakedown does not have the housing need identified in the Plan. The forecast housing need in the Churchill &amp; Blakedown Neighbourhood Plan was tiny in comparison.</p> <p>14. The effect on the local residents will be significant. This is a quiet, residential area. There will be a significant loss of amenity for</p>			

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								<p>residents if this plan goes ahead. My house and garden, for instance, are directly across the train track from the proposed site. The noise level would increase (we currently have no noise apart from the odd train) and there is potential light pollution too. This is not what I chose to move to a small, quiet village location for, and I know that every one of my neighbours that I have spoken to has said the same thing.</p> <p>15. I am hugely concerned about the ecological impact, which has been mentioned but the proposed solution to which is not good enough. There are bats in the area (we see them in our garden at night). This kind of development would put the bats and plenty of other wildlife in the Green Belt at substantial risk.</p> <p>16. I do not believe due consideration has been given to the congestion and problems with road infrastructure this development will create. There is no space on Station Drive for the volume of cars proposed. With the level crossing where it is, there will be horrendous congestion on small sections of road that were not designed for this kind of traffic.</p> <p>17. The road from Blakedown to Hagley towards Birmingham is horrendously congested at the moment at rush hour – sometimes the queues are over a mile long – and mildly congested at other times of the day. This would only get worse with the proposed plan. Why has proper cooperation not been undertaken with the adjoining authorities of Bromsgrove and Wychavon to create a combined strategy to deal with infrastructure issues regarding both rail use and the A456? How do you expect roads that already can't cope to magically start coping when you throw so much more traffic at them?</p> <p>18. There would be an increased use of the country lanes that come to the area. These roads are not designed for heavy traffic flow.</p> <p>19. Many of the trains from Kidderminster to Birmingham do not currently even stop at Blakedown, but pass straight through. Do these proposals mean that trains will stop here more frequently? This in itself will change the nature of the track and noise level for the local residents.</p> <p>20. The intensification of road use around such a small, narrow area will have an adverse effect on local residents. There will be increased traffic while we walk our children to school over the level crossing. We will face congestion to get out of our homes. This will fundamentally change where we live and you should not be allowed to do this.</p> <p>21. A car park always brings an increase in antisocial behaviour. This car park, being in rural, isolated location away from police and casual footfall, will be prime space for drug dealing and petty crime. This is a</p>			

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								<p>wonderful village and we would mourn the loss of its safety and peace, especially in the evenings, should a car park be installed on the proposed site.</p> <p>At a Parish Council meeting last year regarding safe crossings on the A456, we were told by Councillors that we could not have any kind of traffic calming measures or other crossings near the school because we didn't need them (even though there was plenty of anecdotal evidence of near misses with people crossing the road). Why is the same Council now prepared to increase the level of danger around the same area? Absolutely appalling!</p> <p>I am very angry that the Churchill &amp; Blakedown Neighbourhood Plan is being ignored in all this and that the District Council seems intent on turning a small village into a car park, reclassifying our Green Belt without exceptional circumstances to justify doing so. This is not acceptable and I am hugely disappointed in the Council.</p> <p>Ultimately I, and the overwhelming majority of residents of Blakedown, are angry and disappointed that you feel it appropriate to remove our Green Belt and so dramatically change the footprint, the nature and the amenity of our beloved, small village. We believe you are acting immorally and I have heard comments made from those who know more about these things than I, that you are acting illegally</p>			
Gerald Dyer	<a href="#">ALPPS106</a>	Policy AM36.11 WFR/CB/3	Object		No		Justified Consistent with National Policy	It is difficult to see how the proposals meet local needs. Figures produced to support the proposal seem at variance with official figures. Such a development would require change to the infrastructure of the village but has not been proposed and would in any case, change the character of the village. I am also anxious in the increase safety risks that would be created. There is clearly a marked change from the original plan (76% increase) without any clear justification. Encroachment on Green Belt is a serious matter and should not be undertaken lightly.	I do not have enough knowledge as to whether the amendment is legally compliant but would favour its removal until a better thought out plan is produced.	No	
Bridget Rochford	<a href="#">ALPPS110</a>	Policy AM36.11 WFR/CB/3	Object		No	Yes	Justified	<p>Developing the areas around Station Drive will cause congestion. Children walking to the village school and older children going by train to Hagley schools will have to make their way through the traffic. We should be considering extending car parks at Kidderminster and Stourbridge. What about double storey car parks for them.</p> <p>A car park for Station Yard should be limited to 30 vehicles and have substantial screening. Access from Lynwood Drive should be considered very carefully, as no doubt it will impede residents exiting the road or returning home.</p>		No	
Michael Pitt	<a href="#">ALPPS160</a>	Policy	Object	No	No	No	Justified	The development of Housing and Car Park would be on Green Belt land		No	

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		AM36.11					Effective Consistent with National Policy	<p>which is outside the village boundary.</p> <p>The planned area of the proposed car park/houses is greater than the actual area marked on the plan. It does not take into account an area required for Local Wildlife as stated in the government guidelines.</p> <p>This development would be on Green Belt Land and the reason for this seems to be entirely unjustified as per the National Planning Framework par. 136.</p> <p>This plan to build 50 houses in the area is far in excess of local needs and therefore Wyre Forest planners have instigated this simply to fund the extra car park development.</p> <p>There is also a plan for 80 car park spaces in Station Yard which Wyre Forest planners failed to show or mention on the amendment plan. That means Blakedown having imposed on it 250 extra car park spaces. This therefore affects the village and the residents greatly as in 2008 the plan was for an additional 34 car park spaces in Station Yard only, with certain conditions to protect local residents. The increase is immense from 34 to 250 with a huge impact on the area.</p> <p>The local road structure will have imposed on it an extra 250 cars from proposed car park spaces and an estimate of 75 cars at least from proposed housing all converging out into Station Drive, then onto small village roads like Mill Lane, Churchill Lane, Wagon Lane and Stakenbridge Lane. A number of these are small country roads which are only wide enough for one vehicle. The main A456 is already greatly congested with heavy goods vehicles which it was never designed to take. This development would increase the traffic enormously and threaten the safety of the young children attending the local school which verges onto the A456.</p> <p>The level crossing is already a high risk area at peak times. This increase in volume of vehicles and pedestrians trying to cross to either catch the train or children and parents crossing to get to the local school will be make it even more dangerous and even almost impassable at times. These barriers are frequently coming down at peak times and this will lead to frustration for the pedestrians and drivers waiting in their cars. This could lead them to take risks and could even lead to loss of life. The school is located on the A456 and is only a few meters from the exit of Station Drive. To get out of Station Drive on to the A456 is already very difficult but when hundreds of cars are trying to exit Station Drive the risk of accidents will be extremely high. When the barriers at the level crossing are down there will be a bottle neck with cars queuing on both sides of Station Drive. To add to all of this congestion there still will be cars parked by travellers who will refuse to pay car park fees, similar to Hagley.</p> <p>Blakedown is not a sustainable area as suggested in the plan as it only has one small shop, 2 pubs and a local primary school. It has no facility for further education or health services. There is a limited bus service and little or no employment.</p> <p>The extra housing will put a further burden on an already overburdened</p>			

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								<p>Doctors Surgery in Hagley which has had to take people from the new large housing estate on the A456 at Hagley Island</p> <p>I am disgusted with Wyre forest planning in attempting to make the consultation form as difficult as possible to either find on their web site or for residents to fill in.</p> <p>In the consultation drop in sessions none of the maps displayed showed the 80 car park spaces planned for in Station Yard. This I feel was a deliberate omission to deceive the residents and not to show the entire impact on the area.</p> <p>I also feel that due to the change in the district councillors after the recent local elections this project has political undertones.</p> <p>The local residents have been given very little time to formulate their objections and make further investigations with such a late amendment to a plan formulated in 2018 when none of these developments were mentioned.</p>			
Terry Smith	<a href="#">ALPPS164</a>	Policy AM36.11	Object		No	No	Positively Prepared Justified	<p>I am writing specifically in relation to the Lea Castle development and the proposed car park and housing development at Blakedown Station. However, I also wish to comment on what is being described as a consultation process; where from the lay persons perspective, i would contend it is no such thing. I deal with my concerns in this latter regard under the comments section of the form.</p> <p>Having attended one of your drop in sessions, which I found informative, useful and well conducted by the council staff present - my observations are based on a combination of the written plan and the information verbally imparted and unelected representatives from the council at that meeting.</p> <p>BLAKEDOWN STATION CAR PARK AND HOUSING - It was confirmed at the drop in session that the District Council were charged with meeting the vast majority of the County Council Station parking needs and were not allowed to liaise with surrounding/neighbouring districts to explore ways of sharing the burden. I struggle to see how such an enforced restriction complies with a duty to co-operate and therefore be positively prepared.</p> <p>We were also informed that the expansion of the brownfield site at Kidderminster station was less favoured due to the likely traffic congection at Chester Road North and Comberton Road. Again I wish to challenge this thinking particularly as it was envisaged by Council representatives at the drop in meeting that the traffic from the new Lea Castle village would use the Chester Road North/A456 to access the Blakedown station. Consequently traffic congestion becomes an issue at Chester Road North either way so why sell Green Belt at Blakedown when we could build on brownfield site at</p>			

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								<p>Kidderminster.</p> <p>Please note that the use of Chester Road North is the only realistic option from Lea Castle as Hurcott Land and Waggon Lane are single lane roads which cannot accommodate more traffic and Churchill Lane and Stakenbridge are both crossed by National Rail bridges which in turn limit their use.</p> <p>I am concerned about the transparency and genuiness of the consultation process. As I have stated previously I found the drop in sessions informative but that is a long way from consultative. I have two concerns:</p> <p>Once again at the drop in sessions we were directly informed by the elected official that the district council simply had no choice but to pass the Blakedown development despite the consequences for the Green Belt. The reason given was that if you/they failed to do so the County Council would refuse to sign off the District Local Plan. (Implicit in the comments were that the County Council had actually used this threat rather than it just being an action they may take.)</p> <p>The consequences of no Local Plan were described to us as allowing any builder anywhere in the District to apply for Green Belt planning permission and following appeal would successfully receive permission due to the absence of a local plan defence. The corollary as described was the need to sell the Blakedown station Green Belt to save other Green Belt loss.</p> <p>If this representative by a Council official was true then I strongly contend that the Local Plan has not been positively prepared. If not true or only partially true then we were at best being misled or misinformed which is not what we should expect from a genuine consultation process.</p> <p>My second concern relates to the form you have asked us to complete. I can understand the need for structure but there are a number of residents who are intimidated by the prescriptive nature of your document and who as a consequence will not respond. Surely a consultation is about getting the views from the widest possible audience - experts and lay people alike. I place myself firmly in the latter category and hope that my concerns are correctly categorised to meet your internal processes but worry they may not.</p> <p>In summary:-</p> <p>1 - Don't compromise the Green Belt.</p>			

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								<p>2 - A Central Government green policy which wants to increase the use and availability of public transport is not joined up when it requires people to drive miles to park at an out of town station hub rather than more limited expansion at several local stations.</p> <p>3 - District Authorities should be allowed to liase with neighbours regarding the broader transport.</p> <p>4 - Please do not allow a village expansion at Lea Castle because it meets theoretical quotas to warrant new facilities (Doctors surgery and School) when in practice many of the early residents will have to use other facilities anyway.</p> <p>5 - Stop confusing the provision of information with a process of consultation. It is not just the written plan that we want to be consulted on but the broader decision making process that lies behind it.</p>			
Allan and Lynda Hall	<a href="#">ALPPS169</a>	Policy AM36.11	Object		No		Justified Effective	<p>Not justified as no identified need for large scale housing development was in previously agreed plan and no significant changes to alter this. Extending village boundary will significantly affect rural nature of area. Large car park and extra traffic congestion will gravely affect safety on two track road &amp; narrow pavements already struggling to cope. Infant/Jnr school in close proximity to identified site. Appears extra housing is only being added to pay for car park. No effective reason other than to move parking from Kidderminster where extra parking was identified as need but not built. Development could also harm local wildlife/fauna/flora. Not shown if studies have been undertaken to identify threatened species.</p> <p>On a personal level we are concerned about the impact locally on our roads. There is already congestion around the station and nearby roads as people drive from Kidderminster &amp; Stourport to access free parking. It seems unlikely a large fee paying car park will be fully utilised as people do not wish to pay parking as well as the cost of their daily commute. We are extremely concerned about level crossing safety. We use the trains often and see adults and children bolt across the gates or walk across the track to access the other platform. This is due to barriers being down so long that people miss their train. The extra parking and housing is bound to increase the number of commuters and thus the number of potential accidents at the crossing.</p>	Believe amendments should be removed so that the Plan reverts to the previous version which was only approved a few years ago. There have been no changes in the village since then to justify such dramatic alteration to a rural village ie changing Green Belt land, provision of 50 dwellings when property in village is not in high demand and massive car parking increase given the nature of Blakedown train station whereby trains do not even stop here consistently throughout the day and little at weekends. Also there is no	No	



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									footbridge or underpass to ensure safety of large number of commuters trying to cross the tracks.		
Churchill and Blakedown Parish Council  Angela Preece	<a href="#">ALPPS184</a>	Policy AM36.11 Land off Station Drive Blakedown WFR/CB/3	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p><b><u>Planning/Highways</u></b></p> <p>Please see attached Planning and Highways Advice received by The Parish Council which demonstrate why the Local Plan Amendments are not Positively Prepared, Justified, Effective, or Consistent with National Policy.</p> <p>Documents attached from:</p> <ul style="list-style-type: none"> <li>• Simon Rees BSc, MA, MRTPI (Director), AddisonRees Planning Consultancy Ltd</li> <li>• John Lloyd BSc MSc (Transport Planning and Engineering) MCIHT</li> </ul> <p><b><u>Legal Advice</u></b></p> <p>The Parish Council has taken advice from Counsel at Landmark Chambers and makes the following representations:</p> <p>We write to object to the proposed amendment to the Wyre Forest District Local Plan Pre- Submission Publication Document agreed at the Wyre Forest District Council Cabinet at a meeting held on 16th July 2019 resulting in inclusion of an additional site policy, policy 36.6A related to land off Station Drive, Blakedown because as a result the plan is:</p> <p><u>Unsound</u>, in particular in that, applying the tests in NPPF paragraph 35:</p> <ul style="list-style-type: none"> <li>• it is <u>not consistent with national policy</u> because there is no justification for the proposed loss of Green Belt consistent with National Policy, particularly NPPF section 13; and</li> <li>• it is <u>not justified</u> in that its inclusion means that the plan fails to represent an appropriate strategy which has taken into account the reasonable alternatives, and it is not based on proportionate evidence;</li> </ul> <p>And the plan is further</p> <p>Not <u>legally compliant</u>, particularly in the failure to consider reasonable alternatives and to undertake sustainability appraisal or SEA of the significant</p>	<p>1. The NPPG advises as follows:</p> <p><b>What can the local planning authority do if they wish to make changes to the publication version of the plan before it is submitted for examination?</b></p> <p>The local planning authority can include any changes in an addendum to the plan. Where the local planning authority intend the changes to be treated as part of the submitted plan, the addendum, together with any necessary sustainability appraisal of it, should be subject to further consultation (equivalent to the consultation on the publication version) before submission. Where such consultation has not taken place, their proposed changes will be considered by the Inspector during the examination process,</p>	Yes	If it will assist the inspector the Parish Council wishes to reserve the right to speak at the Examination or to allow its planning, highways and legal advisers to do so.

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								<p>effects and reasonable alternatives to policy 36.6A.</p> <p><i>(i) Plan Unsound; not consistent with NPPF</i></p> <p>As the local planning authority will be aware through its role in a leading case on Green Belt boundary alterations, it has been well established since at least <i>Carpets of Worth, Ltd v Wyre Forest DC</i> (1991) 62 P &amp; CR 334 that removing a site from Green Belt requires that exceptional circumstances are fully evidenced: Purchas LJ held:</p> <p>“... [O]nce a Green Belt has been established and approved as a result of all the normal statutory processes it must require exceptional circumstances rather than general planning concepts to justify an alteration. Whichever way the boundary is altered there must be serious prejudice one way or the other to the parties involved.”</p> <p>This precedent is now reflected through paragraph 136 of the NPPF which provides:</p> <p>Once established, Green Belt boundaries should only be altered where <u>exceptional circumstances</u> are <u>fully evidenced</u> and justified, through the preparation or updating of plans.</p> <p>Paragraph 137 of the NPPF states:</p> <p>Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to <u>demonstrate that it has examined fully all other reasonable options</u> for meeting its identified need for development.</p> <p>We set out further below our objection that the local planning authority has not examined fully all other reasonable options.</p> <p>That it has not done so is obvious: the decision to include the site was made in July well after examination of alternatives had been undertaken through the sustainability appraisal and no equivalent process has sought to repair the omission.</p> <p>The failure to examine all reasonable alternatives offends against and is inconsistent with satisfying the exceptionality tests in the NPPF, and is also inconsistent with the requirements of the SEA Directive and the soundness tests.</p>	<p>but will not be treated as part of the submitted plan</p> <p>b. If the newly proposed allocation in policy 36.6A were omitted, that would allow the plan to safely proceed to examination because it would return the plan – in this material respect- to a form which has been the subject of sustainability app It is only the new inclusion of this site which engenders the need for sustainability appraisal at this point. Accordingly, the most commodious means of proceeding and of ensuring that the plan is examined in a form capable of adoption would be to remove the new allocation under Policy 36.6A.</p> <p>78. However, the alternative is to carry out a fresh sustainability appraisal process. In that event, there will need to be identification of reasonable alternatives: in order to</p>		

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								<p>As to justification for the removal of the site from the Green Belt, we note that it is proposed that it be allocated for 50 houses.</p> <p>Yet it is also notable that this is not proposed or justified on the basis of any need for housing being met at this site. Indeed, there is no evidence of urgent need for additional housing in Blakedown. The 2016 Housing Need Survey for the Neighbourhood Plan showed that 7 families wanted affordable housing in the village at that time.</p> <p>The Pre-Submission Plan suggests that 3 affordable units should be built each year. The private market is strong, and there is a regular supply of units for sale and rental. It took nearly 2 years for the houses in Gladstone Place to sell.</p> <p>Paragraph 138 of the NPPF provides that local planning authorities in preparing their plans:</p> <p>“... should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”</p> <p>No adequate work to comply with this aspect of national policy has been undertaken.</p> <p><b><i>Failure to Consider reasonable alternatives: (ii) Unsound (iii) In breach of legal requirements</i></b></p> <p>We further object to the submission of the plan to examination with policy 3.36A included within because the failure to examine reasonable alternatives is inconsistent with the legal requirements imposed by the Strategic Environmental Assessment Directive (and implementing regulations) and further means that the plan cannot be found to be justified as being sound.</p> <p>The inclusion of this 2.7 hectare greenfield Green Belt site for development as a car park and 50 houses represents an allocation of greater significance for the Parish than any proposal within any previous iteration of the Plan.</p> <p>It is a far more significant development than any proposed in the recent Neighbourhood Plan and is in conflict with that plan which itself has been through a lengthy process of consultation and approval.</p> <p>The proposed allocation involves development of what has been established Green Belt over many years and a redrawing of that boundary.</p>	<p>comply with the SEA Directive and Regulations a local authority at least needs to turn its mind to the alternatives: <u>Ashdown Forest Economic Development LLP v Secretary of State for Communities and Local Government</u>[2015]EWCA Civ 681; [2016] PTSR 78. Where an authority fails to give any consideration at all to a matter which it is explicitly required by the SEA Directive to address, such as whether there are reasonable alternatives to the proposed policy, the court may conclude that there has been non-compliance with the Directive: see R (Spurrier) v</p>		

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

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								<p>It involves the development of more than 1 hectare of non-residential development and as such would exceed the threshold in schedule 2 to the EIA Regulations so as to constitute EIA development in the event it was progressed.</p> <p>There has, to our knowledge, been no appropriate assessment of the implications of developing this site in relation to any protected habitats.</p> <p>The development proposed by the 16 July 2019 decision is evidently likely to have significant effects on the environment.</p> <p>Despite its likely significant effects, the proposal advanced through policy 3.36A has not been the subject of sustainability appraisal or strategic environmental assessment or indeed any advance consultation even with our Parish Coun Consequently, the inclusion of the site at this late stage is unsound in that has not been properly justified.</p> <p>Further, it is not in accordance with the legal requirements imposed by the strategic environmental assessment process:</p> <ol style="list-style-type: none"> <li>1. The likely significant effects of the proposal have not been appraised as required by the SEA process;</li> <li>2. The site did not form part of the SA site appraisal;</li> </ol> <p>None of the analyses considering alternatives or appraising candidate housing sites considered the site in question. Consequently, there has been no appraisal of alternatives on the equal basis required by the SEA Directive and by the SA process.</p> <p>The flaw in this process may be illustrated by the decision in <i>City and District Council of St Albans v Secretary of State for Communities and Local Government</i> [2009] EWHC 1280 (Admin); [2010] JPL 70, a challenge to a revision of the East of England Plan, a regional spatial strategy, was upheld. Mitting J concluded that there had not been <i>any</i> evaluation of alternatives to policies proposing the expansion of towns which would require the erosion of the Green Belt. Consequently, there had been a failure to comply with <u>article 5(1)</u> of the SEA Directive in relation to those particular policies so as to justify a quashing order holding at [21]-[22] (<i>emphasis supplied</i>):</p> <p><u>Article 5.1</u> and <u>Regulation 12(2)</u> required that reasonable alternatives to the challenged policies be identified, described and evaluated <i>before the choice was made</i>. The environmental report produced by ERM did not attempt that task. It should have done so and the Secretary of State should not have</p>	<p>Secretary of State for Transport [2019] EWHC 1070 (Admin). In <u>Heard v Broadland District Council</u> [2012] EWHC 344 (Admin); [2012] Env LR 23 a plan was quashed by reason of the failure of the appraisal process to examine options other than the preferred option. An assessment needs to be made of whether the options such as (though not necessarily limited to) the following comprise reasonable alternatives for the purposes of the SEAD and if so that they are subjected to an SEA process:</p> <p>79. Not allocating any additional parking spaces on grounds of</p>		

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								<p>decided to adopt the challenged policies until that had been done. The consequence of omitting to comply with the statutory requirement is demonstrated by the outcome. A decision has been made to erode the metropolitan Green Belt in a sensitive area without alternatives to <u>that</u> erosion being considered. It is no answer to point to the requirement in the policies for Green Belt reviews to be undertaken at the local development framework stage. All that will do is to determine where within the district of the three towns erosion will occur, not whether it should occur there at all.</p> <p>I therefore conclude that in the respects identified the challenged policies were outwith the appropriate power.</p> <p>Even leaving aside the failure to appraise the newly included allocation by policy 3.36A, the SEA process of the plan that was undertaken was cursory.</p> <p>For the avoidance of doubt, there was no SEA of the Parish's Neighbourhood Plan because the proposals within it were not considered to have likely significant effects.</p> <p>The proposed development would introduce a significant effect that would now require SEA.</p> <p>The submission documents which the local planning authority are required to submit to the Secretary of State include, by regulation 22(1)(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012 the sustainability report and by regulation 22(1)(c)(iv) how any representations made pursuant to regulation 18 have been taken into account.</p> <p>Given that the sustainability report has not appraised the inclusion of this site allocation, that represents a significant legal flaw and an unsoundness in the plan which would be incapable of remedy at examination.</p> <p>Paragraph 32 of the NPPF advises- reflecting the extensive case law that: Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. The plan should not be submitted to examination containing this proposal absent proper appraisal of reasonable alternatives to it.</p> <p>In the event that the plan is submitted without removing the allocation of the site and without proper appraisal of alternatives, the Parish Council will submit to the Inspector that the preparation of the plan has not complied with the legal requirements and is unsound and that the deficiencies are incapable of rectification within the examination process: this is not a matter</p>	<p>sufficient space. ii. Allocating a site for car parking without the additional housing proposed.</p> <p>iii. Providing overflow parking on sites of considerably less than 2.7 hectares so as to minimise the scale of development and intrusion into the Green Belt. This could include, for example, allocating the 9 spaces which the SLC representation considered necessary on a pro rata basis for Blakedown itself and</p> <p>1. iv. Appraisal of further provision of parking in other locations, such as for example on brownfield sites in Kidderminster through a multi-storey car park on a brownfield site</p> <p>(for example).</p> <p>1. v. Options for accommodatin</p>		

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								<p>upon which modifications could remedy the defects of process.</p> <p>Local planning authorities must set out in their Statement of Community Involvement how they will <u>engage communities on the preliminary stages of plan- making</u>, specifically <u>survey stage</u> and <u>Local Development Scheme</u>. This does not apply to those plans which have passed Regulation 18(1) stage of the Town and Country Planning (Local Planning) (England) Regulations 2012 before 31 July 2018 in respect of that particular plan/ Statement of Community Involvement.</p> <p>The consultation process does not comply with section 4 of the Statement of Community Involvement.</p> <p>The local plan may also require a <u>Habitats Regulations Assessment</u> if it is considered likely to have significant effects on <u>habitats sites</u> or species located in the local planning authority's area or in its vicinity, as set out in the <u>Conservation of Habitats and Species Regulations 2017</u>.</p> <p>This site is likely to raise such issues under this regime but a <u>Habitats Regulations Assessment</u> has not been carried out.</p> <p>Please see attached:</p> <p><b>Planning Advice</b> - Prepared by Simon Rees BSc, MA, MRTPI (Director), AddisonRees Planning Consultancy Ltd</p> <p><b>Highways Advice</b> - Technical Note - Proposed Land Allocations at Lea Castle &amp; Blakedown. Prepared by John Lloyd BSc MSc (Transport Planning and Engineering) MCIHT</p> <p><b>Please also see The Parish Council's Further Comments in attached response form.</b></p>	<p>g demand in Hagley and Hartlebury.</p> <p>2. v Other assumptions as to the levels of parking demand likely to be connected to rail use. vii. Not meeting the alleged need for additional parking connected to rail use.</p> <p>3. d. We hope that the local planning authority will be able to respond positively to this representation so as to allow the Parish to withdraw its objection Failing the removal of policy</p> <p>36.6A we will be requesting that the Inspector invite, or alternatively direct the withdrawal of the plan pursuant to <u>section 21(9)(a) of the Planning and Compulsory Purchase Act 2004</u>, on the grounds that in</p>		

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									light of the flaws identified above the plan is not capable of being made sound through modifications or after-the-fact consultation: since it is quite clear on the authorities cited above that the SEA process is not an after-the-fact procedure: designed to inform the plan-making choices before a policy is proposed for inclusion in a plan.		
Helen Coll	<a href="#">ALPPS260</a>	Policy AM36.11 - AM36.10 FR/CB2	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	Churchill & Blakedown Parish Council has submitted detailed and comprehensive comments. There seems no point in repeating or adding to them	See above comment	No	
Jim Long	<a href="#">ALPPS180</a>	Policy AM36.11 Land off Station Drive Blakedown WFR/CB/3	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>With WFR.CB.3 it is clear that WFDC are now simply responding to strident demands from WCC to develop the Station Drive site as a mixed use site for much more car parking for the benefit of wider travellers not residents of Blakedown, adding market housing as a S106 “cash cow”, to try to get the car park built at no cost to their budget. It is also obvious that WFDC do not have their own justification for what is proposed – this is a WCC policy and the village of Blakedown is mixed up in that, for political reasons, not co-operation. Evidence of this is pages 16/17 of the agenda to the July</p> <p>2019 WFDC Cabinet meeting where WCC use inflammatory language such as “omission”, “failure”, and “undermine” to characterise WFDC as failing in a duty co-operate and so pressurise the Cabinet. However, WFDC and WCC also each have a duty to co-operate with authorities including parish councils, and therefore to respect Neighbourhood Plans.</p> <p>This proposed change to the Plan seeks to completely override the Churchill and Blakedown Neighbourhood Plan adopted by WFDC in 2017. To justify S106 money which pays for an unproven car park, a district-wide housing, high level, housing needs survey or other methods are being used, which is non compliant because Policy AM36.11 calls for a new <b>Local</b> Housing Needs Survey. This has not yet been done so this allocation is putting the cart before the horse. Even if the Churchill and Blakedown Neighbourhood Plan is</p>	The plan should proceed without the inclusion of the field (App B Map J) and the attendant policy AM36.11, (WFR.CB.3). This would restore the plan to its previous basis which is my opinion would be made compliant subject to my comments on the 2018 version regarding increased public transport provision which are still valid and even more so now. The Local Plan revisions, in the words of WCC themselves (WFDC Cabinet agenda 16/07/2019) “may	No	

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								<p>capable of being ignored (which I question), the amendment to the policy itself requires a new survey, in order to comply. Without it, it presupposes a Local Housing Need for the proposed 3/4 bedroom market housing, which is an unsound basis for the policy. What if the local survey concludes there is no need or a different need, given present supply of this type of house?</p> <p>WFDC Infrastructure Delivery Plan para 3.1.24 says these Blakedown car parks are extemporising measures to relieve pressure on Hagley, which implies diverting cars to Blakedown. This is not being explained by WFDC and so the reasoning for the extra parking is not justified in the Plan. There are no exceptional circumstances (certainly not this) to remove this land from the Green Belt.</p> <p>The 2018 Plan version was considered ready to submit without this amendment, and should be submitted. WCC's accusations that WFDC are undermining a complete regional transport strategy by not allocating this site are not sustainable, and this is the only reason it is included.</p> <p>I am concerned that my comments on the 2018 revision, as far as I can see, have not been acknowledged, since my comments here build on those, and would request that they are taken into account. I attach a copy of these for your reference.</p>	<p><i>appear to be a minor matter", but they go on without justification to elevate this minor matter to attribute that "the consequence of this is to undermine the sustainable transport strategy WCC have sought to achieve through the Local Transport Plan 4 and the Rail Investment Strategy, and its impact may be wider than WFDC itself."</i> How can what is admitted to be a minor matter at a minor station <b>undermine</b> the whole of the West Midlands Rail Investment Strategy? This is the unjustified pressure that WCC have put WFDC under which has led to insufficient consultation on this revision and a misleading steer to WFDC. The West Midlands Rail Investment Strategy Final version only puts 2 trains an hour stopping as the optimal target throughout the period to 2047 (as now), and so this parking must be for the use of new commuter traffic and so is not a matter for the Local Plan. Also the land in</p>		



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									question is only accessible from one rail direction (platform 2) and the only means of access to the other direction is a level crossing. This is an impractical and undeliverable proposal with serious road congestion and rail safety issues.		
Pre-submission Anonymous	<a href="#">ALPPS283</a>	AM36.11	Object					<p>I would like to object to the above plans for the following reasons:</p> <p>Waggon Lane is not wide enough to take safely take the additional flow of traffic. It is already hazardous for walkers and cyclists.</p> <p>Churchill cross roads is dangerous - again - increased flow is likely to lead to more accidents - there are already several there a year. It's completely blind coming from Churchill Lane and from Crown Lane.</p> <p>Outside Churchill Church - already hazardous where traffic comes through too quickly. It is not wide enough for two cars. I've had a number of near misses past there despite travelling slowly. Hazardous also for walkers and cyclists, of which we have many.</p> <p>Mill Lane - two issues, bottle neck by The Mill - two cars cannot pass and the bend is blind. Particularly dangerous for walkers. Parked cars outside the flats - which is residential parking as well as station parking, so if the car park goes ahead, the parked cars will remain, it will again be hazardous - also for those people trying to get off their drives opposite the flats.</p> <p>Birmingham Road - what provision is going to be made for children to cross safely? As far as I am aware it's none. This is irresponsible.</p> <p>There is no doubt that a car park is needed and I don't have any particular objection to some additional housing, but the area is not geared to take additional traffic.</p> <p>Finally, I would like to make two points about the meeting that took place at Blakedown Parish Rooms yesterday:</p> <p>1. The Consultation Response Form - it is not user friendly. I feel that it is</p>			

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								<p>designed to confuse us, not for you to gain meaningful feedback - hence my email rather than bothering to fill out the form.</p> <p>2. To hold it from 3pm - 6pm is divisive. The vast majority of people that this is going to affect are working and therefore couldn't attend (like myself). If you truly want to consult, why have you chosen a time that a large proportion of the local community can't attend?</p>			
Mark Peacock	<a href="#">ALPPS173</a>	Policy AM36.11	Object		No		Justified Consistent with National Policy	<p>I believe there is already scope and provision for some small scale development from the existing Neighbourhood Plan within the Village Boundary and on rural exception sites. The existing plan supports identified growth needs whilst maintaining the rural nature of the area. Churchill &amp; Blakedown was not identified in the Housing Needs Survey as requiring large scale Green Belt development. The proposal has not been underpinned by assessing the impact on the station area, Lynwood Drive, Roxall Close, The A456 and Belbroughton Road of the substantive increase in traffic movements. Roads are narrow, junctions will become congested and foot pedestrian safety ( including school children) will be at higher risk. This in an area where an unmanned level crossing becomes very busy already at peak times. The surrounding narrow lanes like Waggon Lane, Mill and Churchurchill lanes will become more dangerous rabbit runs. Previously, July 2018, the area was identified as needing 10 additional spaces. This has inexplicably rocketed to 270..on what basis and justification is such a disproportionate development justified ? Local Carparks that charge, like Hagley are not fully utilised. Who are the anticipated utilisers of 270 spaces ? The anticipation for such demand is not supported by previous population growth projection in Wyre Forest (105.3K by 2036) and other figures from the Housing Needs Objective Assessment 2017. There has been a shift from 65 to 115 dwellings in the rural villages. As Blakedown has no identified need for such scale of development, use of Green Belt cannot be justified.</p> <p>I would think the sensible, cost effective way forward is appropriate scaled development of spaces on Station Drive. As a resident of Lynwood Drive for over 20 years I well understand the use, needs and movements of traffic on a day to day basis. Something like 30 spaces here, which has previously been approved I believe, with ongoing auditing of use would be a way forward before spending £1m of tax payers money for an unresearched/unjustified high impact , Green Belt development out of keeping with the rural nature of the village</p>	If the original plan was deemed to be legally compliant and sound, then I suggest the ammended plan requires consideration to the above objections in section 9 to also be as legally compliant and sound	No	
Jonathan Charles	<a href="#">ALPPS171</a>	Policy AM36.11	Object	No	No	Yes	Justified Consistent with National Policy	<p>The proposals are not justified because:</p> <p>1. The station car park is disproportionate to the needs of the village and community. Worcester Parkway, a purpose built transitory facility built as part of an integrated transport mechanism will have 500 car parking spaces. Blakedown will have 270? With no improvement to road links to service the</p>	Remove the amendments to the policy and return it to a sound proposal.	No	

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								<p>facility either. A ridiculous proposal.</p> <p>2. Houses. There is no pressing need for the development of these properties. In fact they are being built expressly to fund the car park which is disproportionately large. The housing needs survey did not identify any need for large scale developments in Blakedown &amp; Churchill.</p> <p>3. There is no compelling evidence to support the development of the houses, the life of the plan originally showed that only 65 dwellings were required throughout the WFD rural villages and this has now been changed to 115..... to fund a car park which is not justified. This is inconsistent with National Policy.</p> <p>I can see no reason why Green Belt around Blakedown should be exploited and eroded increasing the boundary of Blakedown. The potential increase in traffic around the station and the balance of the village life set against limited village facilities and amenities would be altered immeasurably. Impact on wildlife, the health and well being of children of the village and the increase in traffic are all negative aspects of this development and not why people come to live in our village. I object to this development.</p>			
Hagley Parish Council	<a href="#">ALPPS186</a>	Policy AM36.11	Object	No	No	No	Justified Effective	<p>We welcome the provision of a large station car park at Blakedown. That as Stourbridge has become inadequate; that at Hagley is also inadequate until charges were imposed and displaced parking on to what is supposed to be a shoppers car park. However we object to the housing element of the scheme, as we do not believe there is a local need for 50 houses arising from a village as small as Blakedown or local employment to sustain so many. Development in A456 corridor is only likely increase traffic on that road which is already being used at peak time beyond its capacity. In order to attract passengers on to the railway, parking needs to be free and the cost collected through rail fares, as is almost invariably done with bus related Park and Ride Schemes. While car parks further up the line, particularly at Stoubridge Junction and Rowley Regis, are free, the prospect of free parking will provide an incentive to drive further to these car parks, thereby increasing traffic. This provides a perverse incentive in relation to the presumed objective of the policy. Furthermore, we do not consider that the option of providing a large car park at Kidderminster Station has been adequately explored.</p> <p>We are also puzzled that no new traffic evidence, data, or information has been provided in either the original Pre-Submission Local Plan or in your amendments to it. Not only did we point out strongly in our response to the original plan that there was a major traffic issue A456 that your proposals for the developments at Lea Castle and Kidderminster East would make much worse, we are also aware that BDC raised issues with the lack of a clear set of transport proposals to support your planned growth. We have not seen any</p>	<p>The field to be used is a large one. It is probable that initially only part of it will be required as a car park. The rest of it should be safeguarded as a potential car park expansion site and protected from any other development.</p> <p>Access from Station Drive is appropriate, but junction alterations as its junction A456 will be required to ensure that traffic can enter and leave Station Drive without difficulty.</p>	Yes	To amplify as necessary this objection and natural justice, ensuring that the Inspector hears both sides of the argument.

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								<p>additional analysis that would make us reconsider our previous conclusion that the WFLP is therefore unsound.</p> <p>The amendments to the plan do not remove our objection to the strategy of building east and north of Kidderminster, which will increase traffic on A456. In September 2012, the volume of traffic going at the Cross Keys junction in Hagley in the day time 7am to 6pm was 49,378. The provision of a car park at Blakedown holding 500 cars might be used by 600 cars in a day, possibly reducing the traffic volume by 1200 journeys. This amounts to a mere 2.5% of the traffic volume. We believe that the Institute of traffic engineers advise that an increase of 5% in traffic volumes due to development is de minimus and can be ignored. The same should apply to the proposed car park. We welcome the proposal for it but it is still inadequate sufficiently to mitigate the adverse effects of the Plan on Hagley.</p>			
David Sherwood	<a href="#">ALPPS194</a>	AM36.11	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>There are so many problems with this proposal that I struggle to know where to start and will try to group my objections as clearly as possible.</p> <ol style="list-style-type: none"> <li>1. The Churchill &amp; Blakedown Local Plan is being ignored in this proposal. There is no need for the kind of housing being proposed here.</li> <li>2. The land is Green Belt. How dare you reclassify our Green Belt to make a huge carpark that overtakes anything the village needs. You are pushing the perceived needs of a huge area in the Wyre Forest onto one small village in a move that will fundamentally change the nature of the village. People move to a village because it is, by nature, different to a town. To have our village flooded by the amount of traffic you are proposing, you are creating something that would not be out of place in a town but would be grossly out of place in a village. This is not acceptable.</li> <li>3. The evidence for this proposal is based around a perceived future need. This means therefore, you have no actual, proper evidence for the necessity of this proposal. Everything you propose is unreliable and untested. Such a dramatic change to a small village should not be carried out on an unreliable and untested evidence base.</li> <li>4. The Local Plan is not sustainable. It seems you have added this site in because you know that the proposed expansions on the east of Kidderminster and at Lea Castle are unsustainable. Therefore it seems you have decided to ruin Blakedown in order to justify expansions elsewhere.</li> <li>5. Kidderminster Station is a much better sustainable site for car parking. There is a reliable, regular transport network and a proper road network in and out. Neither of these things exist at Blakedown.</li> <li>6. Expecting people to drive to use a train (which is the only feasible option at Blakedown) flies in the face of the government's national push for councils to provide genuinely useful public transport options, to reduce the number of cars on the road and cut emissions. Developments at Kidderminster, however, allow the Council to genuinely encourage reduced car use. By</li> </ol>			

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								<p>investing properly in a network of connecting transport services, rather than creating a park and ride on Green Belt, the Council can begin to be a truly sustainable one.</p> <p>7. The plan suggests that Blakedown has infrastructure suitable for the increase in footfall proposed. This is not true. Blakedown has one small shop, a couple of pubs and a small primary school. There is no secondary school, the bus service is extremely limited, there are no healthcare services, there is no petrol station. There is barely any employment (it is a small, residential village). It is the incorrect place for a large car park at the station. Kidderminster, however, has all the things mentioned above and more. It is the correct place for a large carpark and people would expect such a thing there.</p> <p>8. The effect of 170 car parking spaces at a small village (as well as the 80 proposed at Callow Yard) is hugely disproportionate to the corresponding effect of the same number of spaces in a large town.</p> <p>9. The local Secondary School (Haybridge High School) is already over-subscribed and by putting such a large development in the village you risk the school places of others who are further away as the crow flies.</p> <p>10. This plan does not comply with national planning policy, since the removal of this land from Green Belt requires exceptional circumstances. There are no such exceptional circumstances.</p> <p>11. The plan contradicts WFDC's Green Belt Review (2017).</p> <p>12. For such a major development, consultation was last-minute and not proper. There was one consultation held on a weekday at a time when most residents were still at work and could not attend. This is not acceptable and feels underhanded and deliberate. The Council staff who attended the consultation were not properly briefed as they were unable to answer a single question, constantly directing us to "read the proposals". This is, therefore, not a consultation that is accessible to all, especially not to the most vulnerable of residents. It required a high amount of reading and specialist knowledge to understand the documents provided.</p> <p>13. Blakedown does not have the housing need identified in the Plan. The forecast housing need in the Churchill &amp; Blakedown Neighbourhood Plan was tiny in comparison.</p> <p>14. The effect on the local residents will be significant. This is a quiet, residential area. There will be a significant loss of amenity for residents if this plan goes ahead. My house and garden, for instance, are directly across the train track from the proposed site. The noise level would increase (we currently have no noise apart from the odd train) and there is potential light pollution too. This is not what I chose to move to a small, quiet village location for, and I know that every one of my neighbours that I have spoken to has said the same thing.</p> <p>15. I am hugely concerned about the ecological impact, which has been mentioned but the proposed solution to which is not good enough. There are</p>			

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								<p>bats in the area (we see them in our garden at night). This kind of development would put the bats and plenty of other wildlife in the Green Belt at substantial risk.</p> <p>16. I do not believe due consideration has been given to the congestion and problems with road infrastructure this development will create. There is no space on Station Drive for the volume of cars proposed. With the level crossing where it is, there will be horrendous congestion on small sections of road that were not designed for this kind of traffic.</p> <p>17. The road from Blakedown to Hagley towards Birmingham is horrendously congested at the moment at rush hour – sometimes the queues are over a mile long – and mildly congested at other times of the day. This would only get worse with the proposed plan. Why has proper cooperation not been undertaken with the adjoining authorities of Bromsgrove and Wychavon to create a combined strategy to deal with infrastructure issues regarding both rail use and the A456? How do you expect roads that already can't cope to magically start coping when you throw so much more traffic at them?</p> <p>18. There would be an increased use of the country lanes that come to the area. These roads are not designed for heavy traffic flow.</p> <p>19. Many of the trains from Kidderminster to Birmingham do not currently even stop at Blakedown, but pass straight through. Do these proposals mean that trains will stop here more frequently? This in itself will change the nature of the track and noise level for the local residents.</p> <p>20. The intensification of road use around such a small, narrow area will have an adverse effect on local residents. There will be increased traffic while we walk our children to school over the level crossing. We will face congestion to get out of our homes. This will fundamentally change where we live and you should not be allowed to do this.</p> <p>21. A car park always brings an increase in antisocial behaviour. This car park, being in rural, isolated location away from police and casual footfall, will be prime space for drug dealing and petty crime. This is a wonderful village and we would mourn the loss of its safety and peace, especially in the evenings, should a car park be installed on the proposed site.</p> <p>At a Parish Council meeting last year regarding safe crossings on the A456, we were told by Councillors that we could not have any kind of traffic calming measures or other crossings near the school because we didn't need them (even though there was plenty of anecdotal evidence of near misses with people crossing the road). Why is the same Council now prepared to increase the level of danger around the same area? Absolutely appalling! I am very angry that the Churchill &amp; Blakedown Neighbourhood Plan is being ignored in all this and that the District Council seems intent on turning a small village into a car park, reclassifying our Green Belt without exceptional circumstances to justify doing so. This is not acceptable and I am hugely disappointed in the Council.</p>			

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								Ultimately I, and the overwhelming majority of residents of Blakedown, are angry and disappointed that you feel it appropriate to remove our Green Belt and so dramatically change the footprint, the nature and the amenity of our beloved, small village. We believe you are acting immorally and I have heard comments made from those who know more about these things than I, that you are acting illegally.			
Penny Carlton	<a href="#">ALPPS196</a>	AM36.11	Object		No		Justified Consistent with National Policy	The housing needs survey for Churchill and Blakedown did not identify this scale of need so a policy to use Green Belt for 50 houses is unwarranted. There is no evidence to support the need to build a two storey car park on Green Belt when 80 car parking spaces could be made available on Station Yard. see policy 36.6. The policy ignores the health and safety implications arising from the car congestion in such close proximity to the A456. A lot of pedestrians use the area as it is opposite a primary school.		No	
Fiona Mellor	<a href="#">ALPPS216</a>	Policy AM36.11	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	The evidence has not been appropriately tested and in some cases is contradictory – see LTP figures compared to the SLC Rail Report  SLC Rail report is a fundamental part of the revised policy.  I am not aware that this Report has been formally approved/adopted by Worcestershire County Council yet it is being used to justify a significant change in Wyre Forest District Council’s Policy.  I do not believe that these Amendments have been Positively Prepared, or are Justified, Effective, Consistent with National policy  <b>1. Untested and unreliable evidence</b>  SLC Rail’s figures and growth/forecasts have not been verified or tested  Worcestershire County Council’s LTP4 Report uses more recent evidence that SLC Rail have not considered.  It embellishes the need for further parking in Blakedown in addition to that at Station Yard as it can be “developer funded” by 50 new houses (that are not required) instead of providing parking facilities at the busier and more sustainable transport hubs in the District/County (ie the failure to obtain funding for a multi storey car park at Kidderminster Station).  The “need” for spaces also masks the underlying unsustainability in transport terms of the proposed eastern Kidderminster and Lea Castle developments.			

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								<p><b>2. Blakedown is a village station. Kidderminster is an urban/town centre stations.</b></p> <p>Kidderminster has more frequent and varied services, hence its greater use and popularity. Blakedown has a need for station parking but not of the scale proposed.</p> <p>Moving a questionable parking requirement to the next nearest station is not sustainable.</p> <p><b>3. Effect on infrastructure of Kidderminster’s proposed eastern extension and Lea Castle</b></p> <p>The Council clearly has sustainability concerns over the Kidderminster to support such growth from a transport point of view. The Council have been unable to obtain funding for adequate parking at Kidderminster. They are therefore pushing the additional growth and transport pressures on to Blakedown.</p> <p>Using a small scale village such as Blakedown to overcome the sustainability issues of the District overall totally undermines the sustainability credentials of this Local Plan Review.</p> <p><b>4. Plan is contrary to NPPF</b></p> <p>A proper assessment of alternative sites has not been carried out, especially in co-operation with neighbouring Authorities.</p> <p>The Council has not demonstrated proper regard to travel impacts, loss of amenity. In particular Hartlebury Station (Wychavon District Council) is arguably more accessible many parts of the District.</p> <p><b>5. Over intensification of use of site and loss of amenity to neighbouring residents</b></p> <p>The lapsed planning consent for Station Yard 08/0430/FULL - Change of use to car park, landscaping and associated works was for only 34 cars, so the current proposal is a significant increase.</p> <p>That permission contained numerous conditions to safeguard the amenity of neighbouring residents including landscaping, lighting, hours of use, and retention of boundary trees – many of which have now been removed.</p>			



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								<p><b>6. Compromised Access</b></p> <p>Network Rail commented in the refused application at Station Yard for residential development 14/0661/OUTL that “One thing to consider though is that if the access road directly adjacent to the level crossing is being converted into parking as part of the same scheme then the risk of blocking back over the crossing is still possible. With that in mind Network Rail still propose that the original mitigations that were suggested (keep crossing clear signs, yellow box markings) are retained and funded by the developer”</p> <p>There was also concern by the Planning Officer about significant loss of amenity to residents of neighbouring houses on Lynwood Drive and Swan Close. This view was shared by the Planning Inspector at Appeal.</p> <p><b>7. No mention of the Churchill &amp; Blakedown Neighbourhood Plan (Adopted 26/7/17)</b></p> <p><b>8. Lack of detail and consideration of highways issues, access and proximity to level crossing</b></p> <p>Junction layouts, in particular the proximity to A456/Station Drive, Lynwood Drive and proximity to level crossing will cause significant access issues into and out of the site</p> <p><b>9. Requirements for traffic calming and on street parking management have not been considered</b></p> <p><b>10. Concern over use of unsuitable country lanes or already congested A and B road network to reach station:</b></p> <p>From North West/Lea Castle - via Hurcott Lane, Perriford Lane, Waggon Lane, Churchill Lane, Stakenbridge Lane, Mill Lane.</p> <p>From North East/Hagley via A456.</p> <p>Worcestershire County Council are also proposing improvement measures to the A450 between Black Bridge and Hagley. These could impact movements from the South/East via B4188 Belbroughton Road/junction with A456 and Deansford Lane, Sandy Lane/New Wood Lane, Thicknall Lane.</p> <p><b>11. Safe pedestrian access to platforms from car park has not been considered</b></p> <p>No consideration how increased numbers of commuters/drivers will walk</p>			

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								<p>over level crossing to access Platform 2 (to Birmingham).</p> <p><b>12.Loss of amenity to neighbouring houses due to traffic and pollution.</b></p> <p>Residents of Station Drive, Lynwood Drive and Mill Lane will suffer from</p> <ul style="list-style-type: none"> <li>• increased traffic,</li> <li>• intensification of use of a redundant industrial site</li> <li>• Significantly higher level of vehicle movements compared to its historic use</li> <li>• light pollution</li> <li>• noise pollution</li> <li>• potential anti-social behaviour</li> </ul> <p>All during current rail operating hours of circa 06.00 to 23.30 - i.e. anti-social residential hours in mornings and evenings based in the current rail timetable which we anticipate could be changed to reflect the increased use of the Station.</p> <p><b>13.Road network in immediate vicinity of sites is inappropriate for such an intensification of use</b></p> <p>It serves a small residential area. Lynwood Drive is a cul de sac of circa 35 houses. If Station Yard becomes an 80 space car park, Lynwood Drive/Station Drive will have 160+ additional vehicle movements per day.</p> <p>The area is also busy at peak times with the local Primary School. This has a current roll of about 160 with many children brought to school by car due to the rural nature of the local area and lack of suitable alternative transport. A significant number of children also reside in or near the neighbouring villages and settlements of Belbroughton and Hagley.</p>			
Williams Bailey-Allen	<a href="#">ALPPS209</a>	Policy AM36.11	Object		No	No	Positively Prepared Justified Consistent with National Policy	<p>"Guidance on plan-making", Published 13 September 2018 by HM government states -</p> <p>"What is a statement of common ground? A statement of common ground is a written record of the progress made by strategic policy-making authorities during the process of planning for stratefic cross-boundary matters"</p> <p>Amendments to the Pre-Submission Publication Document (July 2019) states - "Statements of Common Ground will be prepared where necessary..."</p> <p>The Pre-Submission Publication is missing a Statement of Common Ground and therefore is not providing a record of co-operation between authorities.</p>	Remove policies 36.6 and 36.6A from the plan and take those elements though due process and challenge. Further consideration should be given to the overall transport aspect of the plan. The thrust is towards rail based sustainable transport but justified	No	

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								<p>As the policies have been published how can there be compliance in this regard? This is clearly a contrived solution looking for a problem.</p> <p>Paragraph 35b) of the NPPF states "Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence".</p> <p>It is not evident to me from the plan that reasonable alternatives have been considered in the respect of transport planning driving policy 36.6 and 36.6A.</p> <p>If there is truly no option but to release Green Belt land to east of Kidderminster and the objective is to support more sustainable transport system then, with a rail line passing through that area, a new station in that location would directly serve the expanding local community, remove the need for extra car miles to Blakedown, and, where customers are not within walking distance, the location would be near to established local transport serving the town. Well designed and appropriately sized parking could be integrated at this location. This seems like a reasonable alternative that's not been considered.</p> <p>The plan makes clear that commercial interests are prepared to deliver parking off the profitability of a housing development in Blakedown. If this is true for Blakedown then it follows that it will also be true elsewhere and therefore could provide a railway station and parking based off developments on the Green Belt land to the east of Kidderminster.</p> <p>Furthermore, the justification for the parking being placed in Blakedown is significantly disproportionate to local needs as identified and tested during the development of the Parish plan.</p> <p>The release of Green Belt land should only be done so under exceptional circumstances yet this plan provides questionable "under average" statistics as justification.</p> <p>The late inclusion of Policy 36.6 and 36.6A has circumvented due process, a single drop-in session presenting the solution by no means consultative. Opinions voiced have not been reflected. The associated justification seems to me to be an "easy" solution to meet political targets and commercial aspects inappropriately defended under the principal of Duty to Cooperate rather than a well-considered, quality plan that truly delivers benefits to the community and honouring the NPPF.</p> <p>The perceived growth in rail usage and the consequential need for parking can be addressed by the alternative I outline above. The secondary factor of</p>	<p>by figures that conflict with other, tested and accepted findings within the Parish Plan. Providing parking at Blakedown to support this seems counter intuitive to sustainable transport as it forces additional miles by car. There is a congestion issue at peak time along the Kidderminster to Birmingham corridor which does needs addressing, just getting more people on a train will not necessarily alleviate that issue when only a small proportion of commuters' destinations are fulfilled by rail and other forms of public transport. Furthermore, providing paid parking at Blakedown does not necessarily going to address the current local issue. Rail users are facing increased fares so seek out free parking, as can be seen now Hagley station parking is chargeable and usage has been declined but free parking at Stourbridge is fully utilized.</p>		

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								<p>antisocial parking around the station has been a factor for many years and compounded by unwillingness to address the situation through enforcement. The identified local need to address this issue is parking for tens of vehicles, not hundreds. A recent/existing planning application for 30 spaces at the Station Yard site would be sufficient to exceed the identified need. The usage of the site would be similar in nature to the previous car leasing business so would have minimal impact to neighbours and the village.</p> <p>Paragraph 8b "a social objective" of the NPPF includes the following - "... by fostering a well designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well being".</p> <p>This plan places an effective out-of-town transport hub in the village of Blakedown which will naturally increase traffic around the station. However there are only two routes to and from the station. One being via the narrow lanes of Churchill and up Mill Land and the other off the main A456 into Station Drive. Many local commuters and children going to Haybridge and other high schools walk these same routes to catch trains at the same time as the traffic peaks which also coincides with the time of arrival/departure from the local primary school. The mix of excited children and commuters in vehicles rushing to catch trains presents I increased risk of collision which is not considered in this plan. It therefore fails in respect of a "safe built environment".</p> <p>The general increase in traffic that will be a natural product of the increased housing around Kidderminster will exacerbate the congestion, pollution and noise the villagers currently endure. As there is no provision within the plan to address this traffic issue the plan fails to "support communities' health".</p> <p>The plan for Station Yard indicates retaining walls will be used around the perimeters at the southern end of the site to provide maximum flat surface for parking, however, the roofs of neighbouring properties are at a similar height to the general level of site so any retaining walls would be an oppressive and dominant feature. This aspect of the plan certainly does not "foster a well-designed environment".</p>			
Peter Dearnley	<a href="#">ALPPS249</a>	Policy AM36.11	Object		No	No	Justified Effective	<p>The proposal for a further 170 station car parking spaces seems to be based on a false assumption: that Blakedown Village should become a major transport hub next to Blakedown Church and Primary School. Turning a quiet village into a busy traffic congested and hazardous thoroughfare.</p> <p>It would be better logic to expand the existing rail car parking facility at Kidderminster station (5 miles from Blakedown) by creating additional levels</p>		No	

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								<p>to the existing multi-story facility. Further, a new ground transport shuttle link between Kidderminster rail and bus stations would free up the present stagnant flow of daily passengers.</p> <p>This will destroy the character of the village causing major traffic congestion and endangering foot pedestrians like young (Pre-11 years) school children by the main Birmingham Road (A456) and numerous retired and elderly people.</p> <p>The building of a further 50 houses in the Green Belt has not been quantitatively argued and is wholly unjustified, and does not take into account reasonable</p>			
Brian Hession	<a href="#">ALPPS247</a>	Policy AM36.11	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>Not consistent with National Policy - inadequate justification for the proposed loss of green belt. No exceptional circumstances.</p> <p>Not legally compliant - failure to consider reasonable alternatives. No evidence of need for additional housing in Blakedown.</p> <p>Inconsistent with Neighbourhood Plan.</p> <p>Absence of adequate consultation.</p> <p>Absence of Habitats Regulations Assessment.</p> <p>Insufficient evidence of need for a further 171 parking spaces.</p> <p>Local roads not capable of supporting development of this nature.</p>		No	
Claire Wood	<a href="#">ALPPS108</a>	Policy AM36.11 WFR/CB/3	Object	No	No	No	Positively Prepared Justified Effective	<p>This is a major development and amendment that has been given last minute consideration and lack of proper consultation.</p> <p>Proper co-operation has not happened with adjoining authorities(Bromgrove and Wychavon) to create a combined strategy to deal with infrastructure issues relating to rail use and congestion issues on A456, A450 and in Hagley.</p> <p>The evidence base is scant, unreliable and untested.</p> <p>The plan contradicts WFDC Green Belt Review (2017)</p> <p>Blakedown alone does not have the housing or parking needs on the scale proposed.</p> <p>The proposed amendment is not in line with the Churchill and Blakedown</p>	Proper consultation with the Local Community using an evidence base that considers - Highways, pollution, ecological impact, pedestrian safety, network rails evidence on the impact of the safety of the level crossing; housing requirements of the village; the alternative potential sites from across the county that	Yes	I will be directly impacted by the proposed amendment.

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								<p>Neighbourhood Plan.</p> <p>The proposed amendments have not been appropriately discussed at either District Council or County Council levels.</p> <p>The Churchill and Blakedown neighbourhood plan should be considered as a context for the proposed amendment.</p> <p>We are being used as a scapegoat as WFDC failed to deliver multi-storey car park at Kidderminster Station.</p> <p>Treat us fairly; consult with us appropriately and be prepared to compromise</p>	could meet some or all of the requirements of the proposed amendments, would allow for an informed consultation exercise and that consultation needs to be done over an appropriate time frame.		
Adam Rollins	<a href="#">ALPPS159</a>	Policy AM36.11	Object	No	No	No	Justified	<ul style="list-style-type: none"> <li>· The evidence based is unreliable and untested</li> <li>· Kidderminster Station is more sustainably located and offers better services than Blakedown.</li> <li>· The focus of investment and development should be in Kidderminster.</li> <li>· Building more car parks leads to more cars on our roads</li> <li>· Investment in connecting public transport services is required, not park and ride stations in the Green Belt</li> <li>· The Local Plan is not sustainable</li> </ul> <p>The proposed expansions on the east of Kidderminster and at Lea Castle are only sustainable if Blakedown is developed as a car park and housing for which there is no identified or proven need.</p> <ul style="list-style-type: none"> <li>· Blakedown is not as sustainable as the Plan suggests</li> </ul> <p>A couple of shops and pubs, a primary school. No Secondary school, limited employment, limited bus services, and no healthcare services.</p> <ul style="list-style-type: none"> <li>· The Plan does not comply with National Planning Policy</li> <li>· Exceptional circumstances have not been shown for removing this land from the Green Belt</li> <li>· The Plan contradicts WFDC's Green Belt Review (2017)</li> <li>· A Major Development that has been given last minute consideration and lack of proper Consultation</li> <li>· Proper cooperation has not been undertaken with adjoining authorities (Bromsgrove and Wychavon) to create a combined strategy to deal with infrastructure issues relating to rail use and also the A456</li> <li>· Blakedown does not have the Housing Need suggested in The Plan</li> <li>· Blakedown does not have the Need for the housing that will be required to make the car park viable</li> <li>· Both schemes will cause over intensification of use and loss of amenity to neighbouring residents</li> </ul> <p>Station Yard had planning in 2008 for 34 cars with conditions on hours of use, lighting, etc to safeguard local residents.</p>		No	What's the point in talking.

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								<p>Now they want 80 on Station Yard and maybe another 170 on the Station Drive Field  Increased traffic  Lynwood Drive is a cul de sac for 35 houses not an 80 space car park.  Light pollution  Noise pollution  Potential anti-social behaviour  Extended hours (06.00 to 23.30) in a residential area  Development of an arable field/Green Belt,  · Access and Highways problems  Will the site be accessed from Station Drive or Lynwood Drive?  Both have many problems - Station Drive could cause queuing over the level crossing. Lynwood would be through a residential cul de sac  Proximity to level crossing and danger of cars queuing back over it  Junction layouts at A456/Station Drive, Lynwood Drive are unsuited to the extra volume of traffic.  Traffic calming and on street parking management have not been considered  Concern over use of unsuitable country lanes  The A and B road networks to reach station from Kidderminster, Lea Castle, Hagley and Belbroughton are already congested at peak times  Rush hour use conflicting with School drop off times  Local highways are inappropriate for such an intensification of use  Station Drive, Mill Lane and Lynwood Drive were designed to serve a small residential area and a village railway station.  Safe pedestrian access to platforms from car parks - will there be a bridge?  · Churchill &amp; Blakedown Neighbourhood Plan has been ignored</p>			
Karen Lindley	<a href="#">ALPPS168</a>	Policy AM36.11	Object	No	No	No	Justified Consistent with National Policy	<p>The existing neighbourhood plan provides for small scale development - not the proposed 50 houses, along with all the additional residents, transport and traffic that this will cause!  The main road through the village is not wide enough to support the lorries and current volume of traffic now!  The other roads / lanes which run around the village are already problematic when 2 cars are trying to pass as the lanes are simply meant for just one car at a time. It will be extremely problematic with even more additional vehicles! Where are you proposing that vehicles pass? What happens when several vehicles are travelling in both directions at any one time? There is nowhere for vehicles to pull in to allow others to pass!  The A456 already carries an average of 450 vehicles in each direction during every weekly daytime hour. There are already huge tailbacks due to drivers trying to enter or leave Station Drive / Lynwood Drive. Additional vehicles (potentially 650 extra vehicle movements each day!!) will just make this ridiculous!!  It is already difficult to turn right out of Belbroughton Road onto the A456, so</p>	The Plan was presumably compliant and sound before the amendments were made! Therefore if these amendments are removed, then the Pre-Submission Plan will revert to being compliant and sound.	No	

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								<p>again, additional traffic will just exasperate this!                      Blakedown village simply does not have a sufficient road infrastructure to be able to cope with the additional traffic!                      The main concern is the safety of the children and their parents / carers when walking to and from school. It is already dangerous due to the volume (and speed) of traffic on the roads, plus all the cars which are parked along Station Drive and the surrounding side roads. Building a carpark where people are expected to pay, will only make this worse as people will not pay (Hagley is a good example of this, as since the parking charges have been introduced, less than half of the spaces are being used and thus more cars are being parked along the roadsides!!                      The safety of pedestrians trying to access the platforms at the train station is also a concern as without a footbridge, the additional volume of traffic will cause a significant risk.                      Blakedown is a village! Therefore it is not as sustainable as the Plan suggests: 2 pubs, a shop / PO and a primary school (full). No secondary school, no doctors surgery, limited employment and limited public transport links.                      Blakedown does not have the housing need suggested and this development is obviously only being proposed because the developers will then pay for the unnecessary carpark, which in turn will mean that we will lose our 'village' status, as well as losing a large proportion of our Green Belt area.                      The Plan completely contradicts WFDC's Green Belt Review of 2017.                      Kidderminster is a much more sustainable and frankly, sensible solution! A multi-storey carpark at Kidderminster Station would solve all the concerns!!                      Also, providing a Lea Castle / Kidderminster link would better serve the local community due to Kidderminster serving a wider set of destinations and has many more trains!                      Introducing a high frequency bus service during peak periods with an hourly service throughout the day, subsidised by West Midlands Trains, as the peak services will pay for themselves. Using a tender, ultra low carbon footprint or even zero emissions vehicles would go towards WFDC's carbon footprint target and would also reduce pollution to our area, improving all of our lives due to less emissions! Surely, if a double decked vehicle could take potentially 75 vehicles off the road with each one load, then this would be the best solution! It would also better serve residents and communities who are cut off due to disabilities or not being able to drive.</p> <p>How are you going to ensure the protection of the Local Wildlife Site and the stream which feeds into the SSSI at Hurcott Pools??</p>			
Churchill and Blakedown Parish Council	<a href="#">ALPPS185</a>	Policy AM36.11 Land off Station	Object	No	No	No	Positively Prepared Justified Effective Consistent with	<p><b><u>Planning/Highways</u></b></p> <p>Please see attached Planning and Highways Advice received by The Parish Council which demonstrate why the Local Plan Amendments are not</p>	Please refer to our representation on Site FR/CB/3 – Land off Station Drive,	Yes	If it will assist The Inspector The Parish



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Angela Preece		Drive, Blakedown, WFR/CB/3					National Policy	<p>Positively Prepared, Justified, Effective, or Consistent with National policy.</p> <p>Documents attached from:</p> <ul style="list-style-type: none"> <li>Simon Rees BSc, MA, MRTPI (Director), AddisonRees Planning Consultancy Ltd</li> <li>John Lloyd BSc MSc (Transport Planning and Engineering) MCIHT</li> </ul> <p><b>Legal Advice</b></p> <p>The Parish Council has taken advice from Counsel at Landmark Chambers in regard to Policy 36.6A, in particular the proposed Policy/Site AM36.11 FR/CB/3 – Land off Station Drive, Blakedown.</p> <p>This causes us to also doubt the legal compliance of the Consultation Process in regard to Policy AM36.6/AM36.10 – Station Yard, Blakedown.</p> <p>Please see attached:</p> <p><b>Planning Advice</b> - Prepared by Simon Rees BSc, MA, MRTPI (Director), AddisonRees Planning Consultancy Ltd.</p> <p><b>Highways Advice</b> - Technical Note - Proposed Land Allocations at Lea Castle &amp; Blakedown Prepared by John Lloyd BSc MSc (Transport Planning and Engineering) MCIHT Dated 8/10/19.</p> <p><b>Please also see The Parish Council's Further Comments in the attached response form.</b></p>	Blakedown.		Council wishes to reserve the right to speak at the Examination or to allow its planning, highways and legal advisers to do so.
Environment Agency Tessa Jones	<a href="#">ALPPS182</a>	AM36.11 Land off Station Drive Blakedown WFR/CB/3	Comment					<p><b>Policy AM36.11 Land off Station Drive, Blakedown WFR/CB/3</b></p> <p>We note the above site is allocated for car parking and residential development (~50 dwellings).</p> <p>Paragraph 155 of the National Planning Policy Framework (NPPF) states: <i>'Inappropriate development in areas of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'</i>.</p> <p>Your Plan should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change. Your Council should be satisfied that there is sufficient developable</p>			

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								<p>area on site, bearing in mind site size and quantum of development, whilst avoiding Flood Zones 2 and 3. In the absence of detailed site specific modelled flood risk information, or a site specific FRA, to confirm an appropriate climate change allowance you may wish to utilise the current Flood Zone 2 extent to indicate the likely, nominal, Flood Zone 3 with climate change extent.</p> <p>Some assessment is necessary in your Plan, to confirm that the site is developable. This includes safe occupation and that there will be no impact on third parties. You should seek opportunities for enhancement, including perhaps the removal of watercourse modifications within the locality of the site which may benefit biodiversity and improve the local flood risk regime.</p> <p>Based on indicative scale of development, detailed modelling is likely to be required at the planning application stage to verify the design flood extents, developable areas and ensure that the development will be sustainable.</p> <p>Whilst the Policy AM36.11 makes no reference to the areas of Flood Zone 2 and 3 present within the site allocation which is an omission, we note point 5 refers to the Churchill and Blakedown Valleys Local Wildlife Site adjoining the site to the north and the requirement for buffering embankment and woodland retained as open space. The LWS on site appears to coincide with the areas of Flood Zones 2 and 3.</p> <p><u>Flood Risk</u></p> <p>Based on our Flood Map for Planning (Rivers and Sea) the northern boundary of the site (as shown in Appendix B – Map E), is partially located within Flood Zones 2 and 3 of an ‘unnamed’ tributary (classified as an Ordinary Watercourse) of the Blakedown Brook.</p> <p>Based on our records, the watercourse does not benefit from detailed site specific hydraulic modelling. Our Flood Map in this location is informed by National generalised JFlow modeling of the River Stour (2011).</p> <p><u>Waste Water Infrastructure</u></p> <p>The site does not appear to have been assessed within the Water Cycle Study (WCS) and therefore it is unclear whether the proposed housing growth can be accommodated in consideration of waste water infrastructure. Information on local treatment works and their ability to accommodate housing and employment growth are included within the WCS. We recommend your Council identifies the receiving sewage treatment works and whether the housing can be accommodated without impacting upon the</p>			

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								<p>receiving treatment works. You should look at physical capacity issues (e.g. network pipes) in consultation with the Water Company; and environmental capacity (quality of treated effluent) issues.</p> <p>Where there is an identified constraint (amber or red) you should demonstrate that there is a solution (it may be already programmed, or could be a possible future infrastructure upgrade) to help improve the capacity issue and enable the development to go ahead. This will require consultation with the Water Company. The outcome of this may inform a 'phasing' policy within your plan where appropriate. It may also be necessary to include this within the Infrastructure Delivery Plan, to set out any key milestones for waste water infrastructure upgrades and improvements. The evidence you produce should give a reasonable degree of certainty to all parties, helping demonstrate development is deliverable, and importantly ensure that your plan is 'sound'.</p> <p>Note: Government Guidance states that sufficient detail should be provided to give clarity to all parties on when infrastructure upgrades will be provided, looking at the needs and costs (what and how much). The National Planning Practice Guidance.</p> <p>(NPPG) refers to "ensuring viability and deliverability – pursuing sustainable development requires careful attention to viability and costs in plan making and decision making". Plans should be "deliverable".</p> <p>I trust that the above confirms our position and assists your Council at this time</p>			
Helen Coll	<a href="#">ALPPS261</a>	Policy AM36.11 - AM36.11 FR/CB3	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>I concur with Churchill &amp; Blakedown's Parish Council's very detailed submission</p> <p>This is a last minute amendment to the plan which will significantly impact on Blakedown and its residents. I hope that the need to finalise the plan will not preclude detailed and serious attention to the objections that have been raised.</p>		No	
Paul Mellor	<a href="#">ALPPS217</a>	Policy AM36.11	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>The evidence has not been appropriately tested and in some cases is contradictory – see LTP figures compared to the SLC Rail Report.</p> <p>SLC Rail report is a fundamental part of the revised policy.</p> <p>I am not aware that this Report has been formally approved/adopted by Worcestershire County Council yet it is being used to justify a significant</p>		No	

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								<p>change in Wyre Forest District Council's Policy.</p> <p>I do not believe that these Amendments have been Positively Prepared, or are Justified, Effective, Consistent with National policy.</p> <p><b>1.Untested and unreliable evidence</b></p> <p>SLC Rail's figures and growth/forecasts have not been verified or tested</p> <p>Worcestershire County Council's LTP4 Report uses more recent evidence that SLC Rail have not considered.</p> <p>It embellishes the need for further parking in Blakedown in addition to that at Station Yard as it can be "developer funded" by 50 new houses (that are not required) instead of providing parking facilities at the busier and more sustainable transport hubs in the District/County (ie the failure to obtain funding for a multi storey car park at Kidderminster Station).</p> <p>The "need" for spaces also masks the underlying unsustainability in transport terms of the proposed eastern Kidderminster and Lea Castle developments.</p> <p><b>2.Blakedown is a village station. Kidderminster is an urban/town centre stations.</b></p> <p>Kidderminster has more frequent and varied services, hence its greater use and popularity. Blakedown has a need for station parking but not of the scale proposed.</p> <p>Moving a questionable parking requirement to the next nearest station is not sustainable.</p> <p><b>3.Effect on infrastructure of Kidderminster's proposed eastern extension and Lea Castle</b></p> <p>The Council clearly has sustainability concerns over the Kidderminster to support such growth from a transport point of view.The Council have been unable to obtain funding for adequate parking at Kidderminster. They are therefore pushing the additional growth and transport pressures on to Blakedown.</p> <p>Using a small scale village such as Blakedown to overcome the sustainability issues of the District overall totally undermines the sustainability credentials</p>			

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								<p>of this Local Plan Review.</p> <p><b>4. Plan is contrary to NPPF</b></p> <p>A proper assessment of alternative sites has not been carried out, especially in co-operation with neighbouring Authorities.</p> <p>The Council has not demonstrated proper regard to travel impacts, loss of amenity. In particular Hartlebury Station (Wychavon District Council) is arguably more accessible many parts of the District.</p> <p><b>5. Over intensification of use of site and loss of amenity to neighbouring residents</b></p> <p>The lapsed planning consent for Station Yard 08/0430/FULL - Change of use to car park, landscaping and associated works was for only 34 cars, so the current proposal is a significant increase.</p> <p>That permission contained numerous conditions to safeguard the amenity of neighbouring residents including landscaping, lighting, hours of use, and retention of boundary trees – many of which have now been removed</p> <p><b>6. Compromised Access</b></p> <p>Network Rail commented in the refused application at Station Yard for residential development 14/0661/OUTL that “One thing to consider though is that if the access road directly adjacent to the level crossing is being converted into parking as part of the same scheme then the risk of blocking back over the crossing is still possible. With that in mind Network Rail still propose that the original mitigations that were suggested (keep crossing clear signs, yellow box markings) are retained and funded by the developer”</p> <p>There was also concern by the Planning Officer about significant loss of amenity to residents of neighbouring houses on Lynwood Drive and Swan Close. This view was shared by the Planning Inspector at Appeal.</p> <p><b>7. No mention of the Churchill &amp; Blakedown Neighbourhood Plan (Adopted 26/7/17)</b></p> <p><b>8. Lack of detail and consideration of highways issues, access and proximity to level crossing.</b></p> <p>Junction layouts, in particular the proximity to A456/Station Drive, Lynwood Drive and proximity to level crossing will cause significant access issues into</p>			

Local Plan Review Pre-Submission Consultation (September / October 2019)

Summary of Consultation Responses (Regulation 20(2) of the Town and Country Planning (Local Planning) (England) Regulations 2012

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								<p>and out of the site.</p> <p><b>9.Requirements for traffic calming and on street parking management have not been considered</b></p> <p><b>10.Concern over use of unsuitable country lanes or already congested A and B road network to reach station:</b></p> <p>From North West/Lea Castle - via Hurcott Lane, Perriford Lane, Waggon Lane, Churchill Lane, Stakenbridge Lane, Mill Lane</p> <p>From North East/Hagley via A456</p> <p>Worcestershire County Council are also proposing improvement measures to the A450 between Black Bridge and Hagley. These could impact movements from the South/East via B4188 Belbroughton Road/junction with A456 and Deansford Lane, Sandy Lane/New Wood Lane, Thicknall Lane</p> <p><b>11.Safe pedestrian access to platforms from car park has not been considered.</b></p> <p>No consideration how increased numbers of commuters/drivers will walk over level crossing to access Platform 2 (to Birmingham).</p> <p><b>12.Loss of amenity to neighbouring houses due to traffic and pollution.</b></p> <p>Residents of Station Drive, Lynwood Drive and Mill Lane will suffer from</p> <ul style="list-style-type: none"> <li>• increased traffic,</li> <li>• intensification of use of a redundant industrial site</li> <li>• Significantly higher level of vehicle movements compared to its historic use</li> <li>• light pollution</li> <li>• noise pollution</li> <li>• potential anti-social behaviour</li> </ul> <p>All during current rail operating hours of circa 06.00 to 23.30 - ie anti-social residential hours in mornings and evenings based in the current rail timetable which we anticipate could be changed to reflect the increased use of the Station</p> <p><b>13.Road network in immediate vicinity of sites is inappropriate for such an</b></p>			

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								<p><b>intensification of use</b></p> <p>It serves a small residential area.</p> <p>Lynwood Drive is a cul de sac of circa 35 houses.</p> <p>If Station Yard becomes an 80 space car park, Lynwood Drive/Station Drive will have 160+ additional vehicle movements per day.</p> <p>The area is also busy at peak times with the local Primary School.</p> <p>This has a current roll of about 160 with many children brought to school by car due to the rural nature of the local area and lack of suitable alternative transport. A significant number of children also reside in or near the neighbouring villages and settlements of Belbroughton and Hagley.</p>			
Karen Fletcher	<a href="#">ALPPS262</a>	Policy AM36.11	Object	No	No	No	Justified Consistent with National Policy	<p>There is no evidence to justify the building of 50 houses. The local plan had suggested a small scale need but nowhere near 50 houses - I would question the reasons behind this (to pay for a car park?) and also doubt that these houses would be classed as affordable (large 4/5 bed roomed homes are not needed in Blakedown).</p> <p>There has been no evidence of consideration to the large increase in traffic and how this will be managed in a small rural village. The road network around Blakedown/Hagley is struggling as is - what are the plans to make our roads safer and able to cater for such an increase in usage.</p> <p>Again, where is the evidence that a study has been carried out to address the management of traffic around Lynwood Drive and Station Drive.</p> <p>What consideration has been made to the change in working patterns now very evident in the city of Birmingham and beyond. I work for a large employer in the city and they are moving to Smart office arrangements from Q3 this year. Meaning that office space is reduced with only limited staff having a full time desk - most will be expected to work from home. They are far from the only firm doing this. Technology is changing the way we work considerably and at a swift pace - more and more people work from home on a regular basis. Please evidence the last research done on the future of passenger numbers to support the need for additional car parking spaces.</p> <p>I cannot understand the logic of using Green Belt land in a rural village to allow people to use their cars to travel to a station. Where is the green policy issue on this? Surely recent political and media attention means that councils should be doing everything to reduce car travel. There are still a large</p>	The previous plan allowed for 10 additional car parking spaces (changed with no supporting evidence to 250) and 65 dwellings for development in all rural villages in the area (changed with no supporting evidence to 115). The local plan should therefore revert back to what it was. If (and this is a big if - as again no support evidence of need has been shown) car parking is required it should be located on once of the brownfield sites within a town (Kidderminster) or a park and ride facility should be developed.	No	Whilst I do not personally wish to speak it is only because I would prefer somebody qualified in planning to speak on my behalf and would endeavour to support the council in finding somebody to do this if required

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								<p>number of brown field sites that could be used as a park &amp; ride facility (once the need for car parking is justified that is) , with then a bus service to a town centre station. This would be a better greener option.</p> <p>Apart from my comments above, I do have concerns of a softer but no less important matter. There has been no reassurance that there will be no felling of trees should this development go ahead. the destruction of wildlife homes (bats, birds, deer, foxes etc) must surely be considered.</p> <p>There is also no mention of any consideration towards increased crime in the area (drugs, speeding, anti-social behaviour).</p> <p>Finally, the continued development on Green Belt land between Hagley/Blakedown and Kidderminster will lead to a loss of the Green Belt wedge dividing these areas - is that really the council's intention.</p> <p>As somebody who (currently) uses the train every day - I see only a small number of train passengers requiring car parking at Blakedown (most live in the village and walk - a large number are children) I ask again - where is the evidence of an increased need for station car parking and indeed an increased need to train travel?</p>			
John Lloyd	<a href="#">ALPPS211</a>	Policy AM36.11 Land off Station Drive, Blakedown WFR/CB/3	Object		No		Positively Prepared Justified Effective Consistent with National Policy	<p>Please refer to Technical Note: Lea Castle and Blakedown Land Allocations TN 191008. The conclusion of the Technical Note is as follows:</p> <p>This Technical Note has presented an outline of some of the significant, and potentially fundamental, highway and transport issues associated with the proposed land allocations at Lea Castle and adjacent to Blakedown rail station. The location of Lea Castle and local congestion issues will inevitably result in future residents and employees travelling along local rural lanes and village roads within Churchill and Blakedown when travelling between the A456 and A451. Furthermore, this situation will be exacerbated by the proposed allocation of land adjacent to the rail station to accommodate 50 residential dwellings and a 170 space car park; this being in addition to the proposed allocation of land to accommodate 80 car park spaces at Station Yard.</p> <p>Significant issues associated with the above have been identified, a number of which will likely cause and/or exacerbate road and general safety issues.</p> <p>It is apparent that the proposed land allocations do not accord with the principles of NPPF and it is anticipated that future more detailed assessments associated with planning applications for development at the proposed sites will identify significant issues. On this basis, it is questionable whether the</p>	<p>Omission or reduction in scale of the Lea Castle (Policy 31) and Blakedown (Policy AM36.11) allocations.</p> <p>Recognition that measures need to implemented to avoid increased traffic flows along rural lanes and village roads.</p>	No	



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								intended development at the proposed allocated sites will be deliverable.  Further to the above, it is apparent that the evidence presented to support the local plan does not take the above, or the wider issues identified within the Technical Note, into consideration.			
Sue Fowler	<a href="#">ALPPS172</a>	Policy AM36.11	Object		No		Justified	<p>Within the Worcestershire Transport Plan LTP4, and all other documentation issued for consultation over the last 4 years, the need has been identified for an additional 10 parking spaces, together with some passenger facility improvements at Blakedown Station on the basis of a possible 100% increase in passengers. It has generally been accepted that the historic planning approval for a car park of 34 spaces in Station Yard could provide a potential site, provided that access and amenity impact issues could be resolved. The population of Wyre Forest is predicted to increase by less than 5% over the period of the Draft Local Plan. The yawning gap between the demographic projections and the expected increase in rail users is incomprehensible, but has not (as far as can be seen) been challenged, and certainly has not been presented for consultation to those who will be most directly affected by the seemingly tenuous forecasts.</p> <p>In the reports on rail usage and car parking supporting this amendment, no reference has been made to the effect of car park charges on the use of station car parking. Currently additional on street station parking at Blakedown is known to be caused by commuters driving past Kidderminster to Blakedown to avoid car park charges. The recent introduction of parking charges at Hagley Station has halved the number of cars parking there. There is no proper 'feel' for the demand for car parking spaces and acceptable fee rates at Blakedown (or at other stations in Worcestershire). As a result, it would seem reasonable to introduce parking at Station Yard in a phased programme, starting at the original circa 30 spaces, rather than building an expensive car park with an engineered retaining wall for 80 cars which could be significantly underused.</p>	Reversion to the original text (Policy 36.9... It is now proposed to allocate the site for station car parking) would allow for appropriate additional spaces to be planned and implemented over the period of the Plan.	No	
Patrick Bates	<a href="#">ALPPS205</a>	Policy AM36.11	Object	Yes	No	Yes	Consistent with National Policy	<p>The Neighbourhood plan already allows for small scale development which makes any further proposal unjustified.</p> <p>The Housing needs survey did not identify the need for large scale development within the Green Belt.</p> <p>Regarding the question of access to the site and increased traffic flow I believe no supporting evidence from Highways.</p> <p>There has been no mention as to whether the proposed car parking will be pay and display I can only assume it will be. Blakedown is already experiencing problems with on street parking the cause of which can be attributed to drivers reluctance to use pay and display facilities provided at</p>		No	

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								<p>Kidderminster and Hagley stations.</p> <p>Does the traffic survey demonstrate what effect the increase in traffic flow will have on Mill Lane, Wagon Lane and Churchill Lane not to mention the A456.</p> <p>In the late 80's the need for a bypass was proposed to reduce traffic on the A456 this was shelved therefore with further increase of present day traffic how can this be accommodated taking on board the revised plan.</p> <p>Further more has evidence been provided to demonstrate how the local school and doctors surgeries will cope with the new influx of families.</p>			
<p>Association of Black Country Authorities</p> <p>Vicki Popplewell</p>	<a href="#">ALPPS178</a>	<p>Policy AM36.11</p> <p>Land Off Station Drive</p> <p>Blakedown WFR/CB/3</p>	Support					<p><b><u>Transport Representation</u></b></p> <p>The A456 from Birmingham to Kidderminster through the Black Country, is already stressed at peak periods particularly at M5 junction 3, Granger Island, and Hagley. Projected housing growth being provided for in the conurbation and in Bromsgrove, as well as your authority's plan, will place additional demands on this corridor.</p> <p>To help meet growing demands for movement in this corridor the transport strategy for the West Midlands conurbation, as articulated in 'Movement for Growth', includes the provision of bus rapid transit, known as Sprint, between Birmingham and Quinton along with the provision of Park and Ride in the Quinton area to serve this route. The future extension of rapid transit in the Walsall to Stourbridge Corridor is also envisaged within the plan period. Through Midlands Connect, the Midlands Rail Hub proposal looks to increase capacity on the Snow Hill Lines both through the provision of additional platforms at Snow Hill and Rowley Regis but also in the longer term through electrification and more frequent services. These developments will add to the demands on the A456.</p> <p>The A456 forms part of the West Midlands Key Route Network and a study is underway to bring forward measures to improve the management of this route, which includes a short section beyond the Dudley boundary to the junction at Hagley. However, these resulting measures will not by themselves deal with the future demands on this corridor. Rail and associated strategic park &amp; ride facilities will have an important role to play. We would therefore like to place on record our support for the proposed development of a park and ride facility at Blakedown. This should intercept trips, particularly those bound for Birmingham, much easier and will make better use of existing and future rail capacity on the Birmingham-Worcester route. In turn this should provide relief to the highway network including the heavily congested junctions at Hagley.</p> <p>These proposals have recently been brought to the particular attention of the</p>			

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								Black Country authorities through recent Duty to Cooperate discussions, so please take this representation as an officer response. We will report to a future meeting of ABCA to seek its endorsement and will advise you when that has been done.			
Marie Charles	<a href="#">ALPPS170</a>	Policy AM36.11	Object	No	No	Yes	Justified Consistent with National Policy	<p>The proposals are not justified because:</p> <ol style="list-style-type: none"> <li>1. The station car park is disproportionate to the needs of the village and community. Worcester Parkway, a purpose built transitory facility built as part of an integrated transport mechanism will have 500 car parking spaces. Blakedown will have 270? With no improvement to road links to service the facility either. A ridiculous proposal.</li> <li>2. Houses. There is no pressing need for the development of these properties. In fact they are being built expressly to fund the car park which is disproportionately large. The housing needs survey did not identify any need for large scale developments in Blakedown &amp; Churchill.</li> <li>3. There is no compelling evidence to support the development of the houses, the life of the plan originally showed that only 65 dwellings were required throughout the WFD rural villages and this has now been changed to 115..... to fund a car park which is not justified. This is inconsistent with National Policy.</li> </ol> <p>I can see no reason why Green Belt around Blakedown should be exploited and eroded increasing the boundary of Blakedown. The potential increase in traffic around the station and the balance of the village life set against limited village facilities and amenities would be altered immeasurably. Impact on wildlife, the health and well being of children of the village and the increase in traffic are all negative aspects of this development and not why people come to live in our village. I object to this development.</p>	Remove the amendments to the policy and return it to a sound proposal.	No	
David Sherwood	<a href="#">ALPPS193</a>	AM36.11	Object	No	No	No	Justified Effective Consistent with National Policy	<p>This is a problematic proposal for a number of reasons.</p> <ol style="list-style-type: none"> <li>1. There was planning in 2008 for 34 cars along with safeguards for residents re. lighting, hours of use. Now the proposition is 80 cars which is a huge increase.</li> <li>2. There will be a lot of traffic. If the entrance is off Lynwood Drive (a cul-de-sac with 35 houses) this will be a huge strain on the road. There will be an increase in light and noise pollution.</li> <li>3. A car park always brings an increase in antisocial behaviour. This car park, being in rural, isolated location away from police and casual footfall, will be prime space for drug dealing and petty crime. This is a wonderful village and we would mourn the loss of its safety and peace, especially in the evenings, should a car park be installed on the proposed site.</li> <li>4. The proposed hours of use (0600-2330) are not appropriate for a residential area.</li> <li>5. If the site is to be accessed from Station Drive there are massive implications for traffic, especially given the level crossing immediately by.</li> </ol>			

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								<p>There is a small section of road from the level crossing to the A456 that could not accommodate queues of traffic.</p> <p>6. The small sections of road around the crossing are not safe for an increase in pedestrians. There are already problems with cars in and around the station causing dangers to pedestrians (especially children), and extra parking of the size being proposed would amplify the problems. Much of the busy times would be when we are taking our small children to and from school. I genuinely cannot see how any infrastructure assessment completed with the remotest notion of due diligence would not highlight the complete unsuitability for an increase in traffic on and around the level crossing. There is not safe pedestrian access to the station. The level crossing is narrow and not able to cope with lots of people as well as cars. Combined with the proposed development on the other side of the road, the whole notion is ridiculous!</p> <p>7. With regards to traffic, there would be an increased use of the country lanes that come to the area. These roads are not designed for heavy traffic flow.</p> <p>8. The congestion towards and away from Blakedown Station is already problematic, particularly going from Blakedown through Hagley towards Birmingham on the A456. This stretch of road (between Blakedown and Hagley) is horrendously congested at rush hour, and mildly congested at other points throughout the day. Sometimes the queues of traffic are over a mile long. This road will not cope with any more traffic.</p> <p>At a Parish Council meeting last year regarding safe crossings on the A456, we were told by Councillors that we could not have any kind of traffic calming measures or other crossings near the school because we didn't need them (even though there was plenty of anecdotal evidence of near misses with people crossing the road). Why is the same Council now prepared to increase the level of danger around the same area? Absolutely appalling! I am very angry that the Churchill &amp; Blakedown Neighbourhood Plan is being ignored in all this and that the District Council seems intent on turning a small village into a car park. This is not acceptable and I am hugely disappointed in the Council.</p>			
Brian Chawner	<a href="#">ALPPS195</a>	AM36.11	Comment					<p>I am not against this proposal but I consider there are some key considerations that need to be taken into account before it can go ahead:</p> <p>1. The proposed entry to the site off Station Drive will cause incredible traffic problems on Station Drive, but if this entry can not be moved to the A456 (see 3 below), double yellow lines must be added to both sides of Station Drive to avoid the potential for accidents. I consider they should also be added to both sides of Lynwood Avenue and Roxall Close to stop motorists using these roads as overflow parking for the station, a problem that already exists.</p>			

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RESPONSES TO CHAPTER AM36: RURAL WYRE FOREST**

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								<p>2. I understand that the station parking is being considered as accessible by residents of the proposed development at Lea Castle. The direct access from Lea Castle to Blakedown station is via Waggon Lane and Mill Lane and requires the level crossing barriers to be raised. Both lanes are not wide enough for two cars to pass and at the bottom of Mill Lane the potential for accidents with his increased level of traffic is enormous. There are also likely to be large tailback queues waiting for the barriers to rise. Unless a viable alternative access route is produced I can not see Blakedown station as a viable option for residents of Lea Castle.</p> <p>3. I understand there has been talk of roundabout access to the development off the A456. This would be a far better solution than the access via Station Drive and would also help as a traffic calming measure for motorists who do not always observe the 30 mile an hour speed limit through Blakedown.</p>			
Rachel James	<a href="#">ALPPS248</a>	Policy AM36.11	Object		No		Justified Effective Consistent with National Policy	<p>The local plan is not sustainable, the proposed expansion for Kidderminster is reliant on Blakedown effectively becoming a car park. The evidence base on which the assumptions have been made are unreliable and untested. Blakedown only has a couple of shops and pubs and a primary school it is not as sustainable as the plan suggests.</p> <p>There are limited us services, limited employment and no health services. The Drs surgery in Hagley is struggling with the current demand from new housing developments more housing is going to increase the strain further.</p> <p>The noise and traffic pollution will have a significant impact on our village and quality of life. The increase of vehicles on what is already a busy and unsafe walk to school will be increased further by attracting more cars into the village. The authority have done nothing at all to address our concerns about the speed of the traffic through the village and are now proposing to send even more traffic through and into it.</p> <p>Exceptional circumstances have not been shown for the removal of this land from the Green Belt.</p> <p>None of our roads are suitable access roads for a large space car park. We will become more of a target for anti social behaviour and crime. Car crime within the village is already on the increase.</p> <p>The proximity of the car park to the level crossing is dangerous with potentially queuing traffic. There is no consideration in the plan for any traffic calming. The roads in our village were designed to support a small residential area and a village station. The safety of all residents will be impacted by this proposal and in particular our children.</p>	<p>Extend the car park at Kidderminster. Create a sustainable transport plan. The building of more car parks leads to more cars on our roads.</p> <p>It would be better to spend transport investment in improving links from both Blakedown itself and other villages by bus, which would tackle social inclusion, as well as providing links to the rail station.</p> <p>The full focus of investment should be within Kidderminster.</p>	No	

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								<p>There have been an increase of the amount of trains operating through the village stopping at the station between 0600 and 2300 with the increase of station users these times are going to create disturbances at unsocial times and with the times potentially extending into the future this will increase any further.</p> <p>The station needs for Blakedown were identified as 10 spaces in all documents relating to the plan until July of this year. Where are all the additional drivers coming from? Data from the Housing Needs Objective Assessment 2017 does not suggest there is such a growth.</p> <p>The original Plan allocated 65 dwellings for development in the rural villages throughout the life of the Plan. The Amendment now allocates 115 dwellings to the same villages. As there is no demonstrable need for large scale development in Blakedown, or in the rural villages of Wyre Forest.</p> <p>The Churchill and Blakedown Neighbourhood Plan has simply been ignored !</p> <p>Extend the car park at Kidderminster. Create a sustainable transport plan. The building of more car parks leads to more cars on our roads.</p> <p>It would be better to spend transport investment in improving links from both Blakedown itself and other villages by bus, which would tackle social inclusion, as well as providing links to the rail station.</p> <p>The full focus of investment should be within Kidderminster.</p>			
Jodie Murray	<a href="#">ALPPS252</a>	Policy AM36.11	Object	No	No	No	Positively Prepared Justified Effective	<ul style="list-style-type: none"> <li>- Needs for the village were/are an additional 10 car parking space.</li> <li>- No consideration on safety of pedestrians including local primary school children in regards to additional traffic on small roads where safety is already an issue.</li> <li>- Lack of consultation, meeting being in working hours and commute time.</li> <li>- Development is not considering the ecological environment, is too large and encroaches too much on local wildlife.</li> <li>- Safety around the level crossing and main A456 to be increased, in regard to pedestrians.</li> <li>- Reduction in the development site by more than half. So less of an impact on the local wildlife.</li> </ul>	<ul style="list-style-type: none"> <li>- Safety around the level crossing and main A456 to be increased, in regard to pedestrians.</li> <li>- Reduction in the development site by more than half. So less of an impact on the local wildlife.</li> </ul>	No	

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								I find it heartbreaking and disgusting the amount of Green Belt been used for building. Our children are the ones who will suffer for our mistakes as this is happening not just UK but world wide.			
Karen Edwards	<a href="#">ALPPS263</a>	Policy AM36.11	Object	No	No	No	Consistent with National Policy	<p>Although the A456 itself is a main road the surrounding roads that would be used to get to Blakedown Station are, in the main, single track roads on which horse riders/dog walkers/cyclists will be put at risk by those speeding to get to the station on time as there are no pathways. I do not believe consideration has been properly thought out regarding the surrounding infrastructure. Local highways are inappropriate for such an intensification of use.</p> <p>The Village is certainly not as sustainable as the plan suggests. The current village of Blakedown has a shop which has recently changed hands. What if this closes? Not all trains stop at Blakedown whereas they do stop at Kidderminster. In some cases the trains stop at Hagley and by-pass Blakedown before stopping at Kidderminster.</p> <p>Congestion will be increased not only on the A456 coming through Blakedown but also on the Belbroughton Road which already suffers with congestion during rush hour due to on-road parking.</p> <p>As the station has a level crossing traffic already builds up when the barriers are down. I believe the sighting of housing at this junction together with the increase in cars that will be requiring access to and from the proposed parking will be an accident blackspot.</p> <p>There is no footbridge over the track which would put pedestrians at risk.</p> <p>Kidderminster Train Station is currently going through a period of refurbishment. It would be much more suited to having an increase in parking through the building of a multi-storey car park there than adding not only houses but also a double storey car park to the village.</p> <p>I do not feel that changing the plan to allow for the building of approx. 50 houses and parking for 170 cars is appropriate for a village of the size of Blakedown.</p> <p>In view of the current news surrounding environmental activists perhaps instead of increasing car parking a secure unit with lockers and the ability to secure bikes would help to encourage cyclists to come to the village to catch the train instead of driving cars to the station which would help to reduce noise and pollution. Perhaps Blakedown could be the new 'Amsterdam'.</p>			
Paul	<a href="#">ALPPS96</a>	WFR/CB/3	Object	No	No	No	Justified	The removal of any Green Belt land is not consistent with the need to reduce		No	

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Carpenter								climate change. While I fully support the use of public transport to help reduce global warming, the use of green field sites for car parking or housing will not contribute to this.			
Neil Rowlinson	<a href="#">ALPPS85</a>	AM36.20 Appendix B - Map J	Object	No	No	No	Justified Effective Consistent with National Policy	The Green Belt is already defensible and as there is no justification presented to remove the area of Land from the Green Belt that constitutes an exceptional circumstance. Blakedown village boundary does not need "rounding off" by effectively moving the boundary closer to Hagley along the A456 with the loss of an arable field with significant wildlife importance.			
John Rostron	<a href="#">ALPPS95</a>	36.6A Land off Station Drive Blakedown	Object		No	Yes	Justified Consistent with National Policy	The Neighbourhood Plan already provides for small scale development within the village which will allow for growth whilst preserving the rural nature of the village so that this development is not justified. The proposals could potentially lead to a huge increase in traffic at busy times around the station area and the junction with the A456 which potentially would expose pedestrians, local children walking to school in Blakedown or to the station, train commuters trying to gain access to the Birmingham platform across the level crossing from the proposed car park at a time when the barriers are going up and down very regularly, to considerably more danger than exists at present. The original Plan allocated 65 dwellings for development in the rural villages which is now increased to 115 dwellings in the same villages. There is no demonstrable need for any increase in the amount of development in Blakedown and it is obvious that this proposed development is purely to help pay for the car park. There is no compelling evidence that justifies Green Belt land in Blakedown being used for car parking.		No	



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RESPONSES TO CHAPTER AM37 : MONITORING AND IMPLEMENTATION FRAMEWORK**

Respondent	Response No.	Part of Document	Support /Comment/Object	Legally Compliant?	Sound?	DTC?	Reasons for being unsound	Summary of Response	Suggested Modifications	Attend Oral Examination?	Reason for Attending
Gladman Developments Ltd  Nicole Burnett	<a href="#">ALPPS136</a>	Chapter 37	Object	No	No	No	Positively Prepared Justified Effective Consistent with National Policy	<p>Gladman raise a number of initial concerns regarding the Council's Five Year Housing Supply report at April 1st 2019 which are outlined below-</p> <p>The report does not provide any details regarding the lead in times and build rates applied to the sites without planning permission, therefore it is not possible to determine if the assumptions being applied are realistic or not.</p> <p>The report provides no commentary or transparency on the proforma responses from developers/promoters.</p> <p>Further to this no evidence is provided of the council making their own judgments on deliverability based on the proforma responses.</p> <p>With reference to the NPPF19 (Annex 2) the revised Planning Practice Guidance and the Woolpit appeal decision, Gladman believe that the Council need to review their claimed deliverable supply and ensure that current national policy and guidance is complied with. The burden is now with the Council to demonstrate sites are deliverable and suitable for inclusion within the five year supply.</p> <p>The Lea Hospital Site only had the S106 signed in June 2019, this therefore post-dates the base date of the assessment therefore it is unclear why this has been included. The Lea Hospital site is assumed to provide 350 completions on this site within the 5 year period. Gladman consider this optimistic and potentially unrealistic, particularly given the fact that average net completions in the whole of Wyre Forest is 185dpa for 2016-2019 period as a comparison.</p>		Yes	Gladman's previous representations with regards the initial regulation 19 consultation still stand as do the site submissions made within these. Given the concerns raised through these combined submissions Gladman would wish to participate at the relevant hearing sessions in due course.