

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Government Office for the West Midlands	CSPO197	2. Context for the formulation of the Preferred Options Paper	Pleased that the responses to the Issues and Options Consultation have been used to develop the Preferred Options.	Support is welcomed.
Government Office for the West Midlands	CSPO202	2. Context for the formulation of the Preferred Options Paper	<p>Pleased that the District Council has considered other local strategies - the Sustainable Community Strategy, Worcestershire Local Transport Plan and the District Housing Strategy.</p> <p>Note that the Council has commissioned various technical pieces of work to inform the evidence base. Need to ensure that these are completed well before publication of the Core Strategy.</p>	<p>Support is welcomed.</p> <p>The publication timetable for the Core Strategy has been carefully planned around the delivery of the evidence base to support it.</p>
Advantage West Midlands	CSPO445	2. Context for the formulation of the Preferred Options Paper	Key place issues of relevance at Core Strategy level, reflecting the Spatial Vision for the Preferred Options document, include "Improving Infrastructure." This includes the development of Kidderminster Rail Station as a gateway to the town, improving air quality and congestion within the main towns and increasing physical linkages through Kidderminster. The development of sustainable communities both through brownfield land development and regeneration within Kidderminster and	Advantage West Midlands' comments are noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			through addressing the need to provide and retain services within the rural areas will be key to the spatial development of the District.	
English Heritage	CSPO419	Para 2.6 Evidence Base	<p>Emphasises the importance of a robust evidence base which should draw on data sources, such as the County Council's Historic Environment Record, local lists, and characterisation tools, such as conservation area appraisals, historic landscape characterisation and urban characterisation.</p> <p>Concerned about the relevance of the evidence base in relation to the historic environment. Highlights concerns over the soundness of the Core Strategy with respect to the historic environment.</p> <p>Welcome clarification of the type of information on the historic environment that has been used to inform the Local Development Framework.</p>	<p>The concerns over the soundness of the evidence base in relation to the historic environment are noted.</p> <p>The Core Strategy places great emphasis on local distinctiveness and the historic environments in both urban and rural landscapes are key to achieving this.</p> <p>The evidence base and information used to inform the development of the Core Strategy so far is comprehensive and includes the following:</p> <ul style="list-style-type: none"> - Conservation Area Appraisals - Local Lists - Parish Plans - Chaddesley Corbett Parish Design Statement - Worcestershire County Council's Historic Landscape Characterisation Project. - Adopted Design Supplementary Planning Guidance. <p>The Council would be happy to discuss this in more detail with English Heritage.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Worcestershire County Council	CSPO211	2. Context for the formulation of the Preferred Options Paper	Paragraph 2.7 should also make reference to PPGs which remain extant.	Noted and agreed.
National Grid	CSPO33	2. Context for the formulation of the Preferred Options Paper	<p>Our transmission pipelines and overhead lines were originally routed in consultation with LPAs and designed to avoid major development areas, but since installation much development may have taken place near our routes. Therefore wish to be involved in the preparation, alteration and review of DPDs which may affect our assets, specifically relating to the following issues:</p> <ul style="list-style-type: none"> - Any policies relating to overhead transmission lines, underground cables or gas pipeline installations - Site specific allocations/land use policies affecting sites crossed by overhead lines, underground cables or gas transmission pipelines - Land use policies/development proposed adjacent to existing high voltage electricity substation sites and gas above ground installations. - Any policies relating to the 	Noted. This background information relating to infrastructure provision is very important.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>diverting/undergrounding of overhead transmission lines.</p> <ul style="list-style-type: none"> - Other policies relating to infrastructure or utility provision. - Policies relating to development in the countryside - Landscape policies - Waste and mineral plans <p>High voltage electricity overhead transmission lines/underground cables within Wyre Forest District Council's administrative area than form an essential part of the electricity transmission network include:</p> <ul style="list-style-type: none"> - ZN 275/400KV route Fakenham substation in Redditch Borough to Penn substation in Wolverhampton passing through Wyre Forest District. - YYB 27kv route from Bishops Wood substation in Wychavon to join the ZN line in Bromsgrove District - YYC 275 kv route from Bishops Wood to join the ZN line in Redditch District. - National grid has no gas transmission assets located within the administrative area. - National Grid Gas Distribution owns and operates the local gas distribution 	

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			network in the Wyre Forest District Council area.	
Upper Arley Parish Council	CSPO251	2.3	Considers that paragraph 2.3 should include the words "to achieve a better quality of life for everybody now and in the future."	Noted. Amend penultimate sentence of paragraph 2.3 to read as follows: "SA is a tool which evaluates the social, environmental and economic impacts of a plan to achieve a better quality of life for everybody both now and in the future."
West Midlands Region RSL Planning Consortium	CSPO35	2. Context for the formulation of the Preferred Options Paper	Finds the context for the formulation of the Preferred Options Paper a useful summary. Recommends that the progress of the emerging Regional Spatial Strategy is closely monitored. Changes to housing strategy and targets in particular may have a strong influence on growth envisaged for the District. This should be taken into account in future drafts of the Core Strategy.	Noted. The Core Strategy must be in general conformity with the Regional Spatial Strategy. Officers continue to monitor its progress carefully.
The Inland Waterways Association	CSPO148	2. Context for the formulation of the Preferred Options Paper	Draws attention to a number of documents which they feel have been overlooked in the Core Strategy context. These being: 1. River Severn Catchment Management Plan (EA) 2. Waterways for Tomorrow (DETR 2000) - currently under updating review. 3. Water Framework Directive (EU). 4. River Severn Basin Management Plan (EA) - draft.	Noted. The SA Scoping Report to the Core Strategy scoped a number of key documents to identify key sustainability issues as part of scoping work undertaken on the Core Strategy. These included the documents highlighted by the IWA.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Severn Navigation Restoration Trust	CSPO181	2. Context for the formulation of the Preferred Options Paper	<p>Urges consideration of the Environment Agency's River Basin Management Plan for the River Severn within the Core Strategy.</p> <p>Hopes that the District Council will consult and co-operate with British Waterways, Environment Agency, Severn Trent Water and neighbouring District and County Councils.</p>	<p>Noted. The River Basin Management Plan has formed part of the background information to the Core Strategy. It has also been considered through the Strategic Flood Risk Assessments and the Water Cycle Study commissioned as background evidence to the Local Development Framework and was also scoped under the Sustainability Appraisal Process.</p> <p>The key stakeholders identified are all Statutory Consultees under the Local Development Framework and have been involved with formulating the Core Strategy and contributed to the SFRA and Water Cycle Study process.</p>
Wyre Forest District Council	CSPO337	2.9	<p>Clarifies points on the Wyre Forest District Housing Strategy outlined under paragraph 2.9. A countywide strategy will replace this.</p> <p>Also highlights the need to add in the Worcestershire LSP/LAA, which includes National Indicators 154/155 relating to housing provision.</p>	Noted. Amend Paragraph 2.9 to include these further strategies in the Submission document.
Mr Robin Hardwick	CSPO174	2.10 Cross Boundary Issues	Objects to the extension of development into the Malvern Hills District on land at Astley Cross, 4Stourport-on-Severn.	Noted. Although this is raised as a potential cross boundary issue in terms of future development pressure. The Spatial Strategy focuses on brownfield development within the main urban areas

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
				of the District. It is not therefore considered that such an extension would be required over the duration of the Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
West Midlands Regional Assembly	CSPO415	General Comments	<p>Considers that the Preferred Options paper moves the planning of Wyre Forest forward in line with the emerging WMRSS. The document also seeks to address the transportation and environmental issues in line with the emerging RSS.</p> <p>The document notes the figures from the NLP study and states that options were identified in order to reflect these increased levels of growth. However, these have not been reflected within the Preferred Options with regard to ensuring that the Core Strategy has flexibility to take account of potential additional growth arising from the WMRSS.</p>	<p>Support is noted.</p> <p>With regard to the NLP figures, this will be clarified in the Submission Core Strategy once the WMRSS Phase 2 EiP has taken place.</p>
West Midlands Regional Assembly	CSPO416	General Conformity	<p>Whilst the Core Strategy reflects the general direction of the WMRSS Phase 2 Revision, it does not provide sufficient flexibility to demonstrate that additional growth arising from WMRSS2 can be accommodated. The Submission Core Strategy will need to consider and respond to the outcome of the WMRSS2 EiP which may affect both the quantity and location of housing and employment growth required within the District. Nevertheless, the Paper is in general conformity with the WMRSS.</p>	<p>Support is noted. The issues of additional housing and employment growth will be dealt with through the development of the Submission Core Strategy once the EiP panel report has been received.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Environment Agency	CSPO505	General Comments	<p>Recommends that greater emphasis is put on the enhancement as well as the protection of natural resources and the environment.</p> <p>Specific reference should be made to groundwater and the areas that are protected by the groundwater vulnerability zones and source protection zones should be included. Core policies should then include a statement that the quality of air, land and water resources should be conserved and enhanced.</p>	Noted and agree.
Natural England	CSPO448	General Comments	<p>Thanks WFDC for consultation and sets out background to Natural England.</p> <p>The Preferred Options Paper has many strengths and provides a positive starting point for future development. Endorses the promotion of sustainable development and the clear use of Sustainability Appraisal for policy selection. Welcomes the references to Green Infrastructure and endorses the intended Green Infrastructure Study and offers support for taking this forward.</p>	Support is noted.
English Heritage	CSPO417	General Comments	Thanks WFDC for consulting English heritage.	Noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Identified that English Heritage is preparing guidance on Core Strategies which will be available later this year.	
English Heritage	CSPO418	General Comments	<p>Argues a Core Strategy should sustain and shape the historic environment allowing people to enjoy it and to use it without compromising it. The impact on local character and distinctiveness should be one of the main concerns when developing a Core Strategy.</p> <p>Priority is to ensure that the Core Strategy clearly expresses how the historic environment and individual assets of an area will be managed in a proactive and positive way. This should involve considering:</p> <p>How the historic environment contributes to local identity and distinctiveness and informs successful place shaping, and how it might be used to guide development in the future;</p> <p>The existing and future potential threats to the historic environment and how these might be addressed; and</p> <p>How it might be used more positively to help deliver the wider environmental, social and economic objectives for the</p>	Noted and agree. The Council will refer to English Heritage's guidance when developing the Submission Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>local area.</p> <p>These considerations should run throughout the document.</p> <p>The historic environment should be broadly defined to include all historic assets whether designated or not. This covers buildings, and other structures and features, archaeological remains, historic open spaces and the historic character of the District's rural landscapes and townscapes.</p> <p>Recommends that the District and County historic environment officers are involved in preparing the document at the earliest opportunity and that Civic Societies and other relevant groups are engaged.</p>	
Highways Agency	CSPO357	General Comments	Requests that the Highways Agency continue to be consulted in the future.	Noted.
Upper Arley Parish Council	CSPO245	General Comments	Generally supports the document. Provides background information on the parish of Upper Arley.	Support is noted.
Upper Arley Parish Council	CSPO247	General Comments	Enthusiastic about the papers but suggests that the language could have been further simplified with the removal of planning jargon.	Support is noted. Seek to simplify language and planning terms in the future where possible.
British Waterways	CSPO250	General	Sets out background information on British	Support is noted. Add a definition of

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		Comments	<p>Waterways and highlights the publication "Waterways and development Plans"</p> <p>Welcomes the consultation document and its numerous references to the waterways and canal in full context. Consider that the document would benefit from a definition of inland waterways as encompassing canals, navigable rivers and reservoirs. Indeed, waterways by definition must be navigable. this should not be used interchangeably with the term 'watercourses'</p>	waterways to the Jargon Guide.
Country Land & Business Association	CSPO378	General Comments	Sets out background information on the Country land and Business Association (Ltd).	Noted.
Country Land & Business Association	CSPO380	General Comments	<p>Sets out background information on the rural economy and rural development. Argues that the Core Strategy should not restrict the mix of development in the countryside, nor limit the location of development to public transport routes and that the Core Strategy should encourage a greater mix of economic development in the countryside including rural tourism/leisure, renewable energy and other uses of land and buildings. The Core Strategy must recognise the role that diversification can make to the rural economy.</p>	Noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Sets out background information on rural areas arguing that rural areas should provide employment for those people who live there. Wyre Forest is predominantly rural and the strategy should encourage and support landowners and farmers to contribute to the local economy. The need for a diversified rural economy must be recognised.	

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Government Office for the West Midlands - Planning Team	CSPO196	5. Spatial Portrait	Support for the Spatial Portrait. This together with the Spatial Vision provides a clear context for informing the preferred options.	Support is welcomed.
Advantage West Midlands	CSPO446	5. Spatial Portrait	Comments on the importance of the District's industrial heritage and its contribution to cultural offer and the role of natural assets in relation to quality of life and for tourism and leisure opportunities.	Noted.
Environment Agency	CSPO510	5. Spatial Portrait	Paragraph 5.8 should be reworded to state "medium and high risk flood zones." (flood zone 2 and 3 respectively). This amendment should be made throughout the document.	Noted and agreed.
Natural England	CSPO449	5. Spatial Portrait	Support for the Spatial Portrait and welcomes the recognition of the District's unique natural environment and the challenges and opportunities which this presents.	Support is welcomed.
English Heritage	CSPO420	5. Spatial Portrait	General support for the Spatial Portrait. Particularly in describing the District's three main settlements. Considers that the Spatial Portrait could be further strengthened by explicitly linking the historic assets of the District such as opportunities for heritage led regeneration in Kidderminster and Stourport. Management issues could also be drawn out for example, assets identified as at risk. Emphasises the need to safeguard	These comments are considered useful. However, they are too detailed to include within the Spatial Portrait and should be further developed through the Core Policy Areas.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			the valued character of Bewdley and the historic character of the District's rural landscapes in the context of new development and tourism pressures.	
Worcestershire County Council	CSPO212	5. Spatial Portrait	<p>Highlights a number of points in relation to the Spatial Portrait.</p> <p>Expansion of paragraphs 5.4& 5.5 to include further historical facts. Also considers emphasis should be added to the Wyre Forest itself in the opening sections given its dominance as a landscape feature.</p> <p>Considers reference should be made to the network of designated wildlife sites and wider range of habitats.</p> <p>Paragraph 5.8 - unclear as to why temperature change has been added here.</p> <p>Paragraph 5.9 would benefit from a brief explanation of what a Geopark is.</p> <p>Paragraph 5.10 - Considers that reference to Landscape Protection Areas should be removed in accordance with National Planning Policy.</p>	<p>It is considered that paragraphs 5.4-5.5 of the Spatial Portrait could be altered to include the historical facts outlined by the County Council.</p> <p>The Environment Section of the Spatial Portrait would benefit from reference to designated wildlife sites and the range of habitats.</p> <p>Paragraph 5.8 also relates to flood risk and temperature change can exacerbate this.</p> <p>A definition of a Geopark will be included in the Jargon Guide rather than in the Spatial Portrait.</p> <p>The wording in Paragraph 5.10 should be amended to read "sensitive landscape character of the area."</p>
Herefordshire &	CSPO126	5. Spatial	Considers that the natural environment	Noted. It is considered that a form of the

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Worcestershire Earth Heritage Trust		Portrait Para 5.8	section of the Spatial Portrait should begin with a brief overview of the geology and suggests detailed wording.	wording suggested could be added into the Environment section of the Spatial Portrait. However, the Core Strategy and Spatial Portrait must be succinct and details on the characteristics of the District are set out in background papers relating to the Sustainability Appraisal and evidence base.
Herefordshire & Worcestershire Earth Heritage Trust	CSPO127	5. Spatial Portrait Para 5.9	Supports inclusion of the geopark considers a definition appropriate.	Noted. The definition of a geopark could be included within the Jargon Guide.
Worcestershire Biodiversity Partnership	CSPO70	5. Spatial Portrait Para 5.8	Highlights the impact of extreme weather arising from climate change on the habitats of the area (particularly wetlands) in addition to habitat fragmentation as a challenge into the future. Considers that these could be set out within the Spatial Portrait.	Noted. It is considered that these challenges could be added to Paragraph 5.9 of the Spatial Portrait. Particularly as they form the basis for Core Policy Areas within the Strategy.
Worcestershire Greenpeace	CSPO62	5. Spatial Portrait Para 5.9	Considers that the role of farming should be outlined in the Spatial Portrait.	Noted. Paragraph 5.12 refers to the important role of agriculture within the District. Background information on employment statistics by sector is available from the Sustainability Appraisal Scoping Report.
The Inland Waterways Association	CSPO149	5. Spatial Portrait	Considers the Staffordshire & Worcestershire Canal should be included at Paragraph 5.13.	Noted and agreed.
Centro- WMPTA	CSPO101	5. Spatial Portrait Paras 5.16-5.17	Recognises Kidderminster Rail Station as a significant station within the West Midlands and supports its redevelopment.	Support is welcomed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		and 14.5		
Campaign to Preserve Rural England	CSPO296	5. Spatial Portrait	<p>General support for the Spatial Portrait but raises a number of detailed points.</p> <p>Paragraph 5.4 - Should further clarify Kidderminster's role as a Tier 4 retail town in WMRSS.</p> <p>Paragraph 5.6 - fails to acknowledge Bewdley's former role as a river port.</p> <p>Paragraphs 5.7 & 5.9 - there should be a collective description of the large villages. Considers that Wilden should be incorporated into the Greenbelt.</p> <p>Paragraph 5.10 should set out more information on the extent of woodland in the District.</p> <p>Paragraph 5.16 should acknowledge poor rural bus services.</p> <p>Paragraph 5.17 - does not acknowledge possibility of developing the Severn Valley Railway for public transport.</p> <p>Paragraphs 5.14-5.17 - fail to acknowledge the possibilities of water transport.</p>	<p>The specific points in relation to Paragraphs 5.4, 5.6, 5.7, 5.10 & 5.16 are noted and it is considered that they can be incorporated into the Spatial Portrait.</p> <p>The points raised in relation to paragraphs 5.14 - 5.21 relate to future proposals rather than a portrait of the current characteristics of the District.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Paragraph 5.21 -fails to identify the need to diversify housing.	
Severn Navigation Restoration Trust	CSPO179	5. Spatial Portrait	<p>Considers that Bewdley should also be referred to as an inland port with surviving wharves.</p> <p>Paragraphs 5.14 - 5.16 considers that the River Severn should be included as a designated commercial waterway.</p>	<p>Noted. It is considered that Paragraph 5.6 could include further details on the town's history as an inland port.</p> <p>Whilst the potential for the River Severn as a commercial waterway is noted, the Spatial Portrait is a description of the current characteristics of the District.</p>
Bovale Limited	CSPO20	5. Spatial Portrait	General support for the Spatial Portrait and in particular the retention of paragraphs 5.2, 5.6 and 5.13. Raises the need to provide accommodation for the District's ageing population and adequate provision of sufficient and appropriate visitor accommodation.	Noted. These key issues are identified in the Spatial Portrait, Vision, Objectives and within the Core Policy areas. Specific sites would be allocated in accordance with the overall development strategy set out in the Core Strategy, within the Site Allocations & Policies DPD.
West Midlands Safari Park	CSPO185	5. Spatial Portrait Paragraph 5.13 - The role of tourism in the District's economy	Support the recognition that tourism and in particular the West Midlands Safari & Leisure Park is an important element of the District's economy in the Spatial Portrait. However, concerned that the Strategy fails to build upon this reference in its actual policies. There are no firm policy aspirations to expand tourism and in particular the West Midlands Safari & Leisure Park.	<p>The Preferred Options Paper is not a Draft Core Strategy, it sets out the preferred direction for Core Policies and the Submission version of the document will contain draft policies.</p> <p>Tourism is recognised as a major contributor to the local economy. The Council is keen to promote sustainable tourism in the future. This will need to carefully consider transport implications from major trip generators such as the</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
				West Midlands Safari Park and the impact of expansion on the Green Belt and Landscape Character.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
West Midlands Regional Assembly	CSPO389	6. Spatial Vision & 7. Objectives	The Spatial Vision and Spatial Objectives generally accord with the emerging WMRSS Phase 2 Revision.	Support is welcomed.
Advantage West Midlands	CSPO447	6. Spatial Vision	General support for the Vision. Emphasises the focus on emerging industries including innovative manufacturing, recycling and sustainable technologies and future changes in agricultural activity to biofuels and local food production. Also emphasises the role of sustainable tourism.	These comments are noted.
Environment Agency	CSPO511	6. Spatial Vision	The second paragraph of the vision should include "incorporating water efficiency and minimisation techniques". The sentence regarding sustainable brownfield redevelopment in para 3 should include "with the remediation of contaminated land".	Noted and agreed.
Natural England	CSPO450	6. Spatial Vision	Full support for the Vision and the steps towards sustainability which it advocates. Particularly welcome the promotion of green infrastructure, sustainable technologies and tourism. Advocates that low carbon emissions and reliable infrastructure should be applied to all forms of housing.	Support is welcomed.
English Heritage	CSPO421	6. Spatial Vision	Suggests a number of amendments to the Spatial Vision:	Noted. It is considered that Kidderminster's industrial heritage could be referred to in the third paragraph

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>Third Paragraph - the aspiration for brownfield regeneration is made more proactive - capitalising on the town's industrial paragraph.</p> <p>Second Paragraph - recommends that protecting and enhancing the character of the District's landscape (including its historic character) is emphasised. Also suggest that the Wyre Forest "Grow The Wyre" project is mentioned.</p>	<p>although this needs to be counterbalanced with the fact that the Spatial Vision looks to 2026 rather than the present.</p> <p>It is considered that wording on enhancing the District's historic landscapes could be included in the Vision. It is considered that the Grow The Wyre project is a specific current project and the Vision again looks to 2026 and a number of similar projects could also come forward during this timescale.</p>
Worcestershire County Council	CSPO213	6. Spatial Vision	Considers that the unique resource of the Wyre Forest itself is not mentioned in the Vision. The forest is an important natural and historic resource with potential for tourism and an economic resource.	Noted. The Vision needs to be succinct and it is considered that Paragraphs 2 and 8 would relate to the role of the Wyre Forest itself. Grow The Wyre is a specific project which is acknowledged in the Spatial Portrait. The role of the Spatial Vision is to set out what has been achieved by 2026. It is a snapshot of the District in the future.
Wyre Forest Matters LSP Chair	CSPO548	6. Spatial Vision	Supports the continuing development of the Local Development Framework and the strong alignment between this and the Sustainable Community Strategy. The LDF will play a big role in delivering the SCS.	Support is noted.
Kidderminster Civic Society	CSPO482	6. Spatial Vision	General support. However considers that the three towns and rural areas are not	These comments are noted. The Spatial Vision is an aspirational vision for the

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>well served by a sustainable transport network. Bus services are often, at best, patchy.</p> <p>Whilst this may be an aspiration unless much public money is injected it is unlikely that such a widespread area will be sufficiently served by public transport. Private cars are still likely to be needed and whilst their use could be discouraged where possible, realities again need to be recognised. Also where we are trying to attract out -of - town shoppers to Kidderminster. It should also be recognised that Town Centre workers may need parking for whom public transport is not a realistic option.</p>	<p>future of the District in 2026. A sustainable transport network is key to this vision and key to achieving more sustainable development patterns for the District in the future. It is vital that new development contributes to improved public transport and alternative transport modes to reduce reliance on the private car and to offer realistic alternatives.</p> <p>The Spatial Vision should not maintain the status quo.</p>
Worcestershire Biodiversity Partnership	CSPO71	6. Spatial Vision Para 6.1	Coverage of the natural environment in the vision is welcomed, however the insertion of the word 'and' between thriving and offering, and altering offering' to 'offer' would remove the implied interpretation that offering education and recreational benefits is necessary for the natural environment to be 'thriving'.	Comments are noted and agreed.
West Midlands Region RSL Planning Consortium	CSPO36	6. Spatial Vision	Support for the Spatial Vision. However questions the wording "Vulnerable people are able to remain longer in decent homes". This should be reworded to reflect individual's aspirations, which could	Noted. It is acknowledged that vulnerable people may choose alternative forms of accommodation and it is considered that this could be reflected within the Spatial Vision.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			include alternative forms of accommodation as with extra care homes.	
Wyre Forest Friends of the Earth	CSPO53	6. Spatial Vision	<p>Suggests additional wording to paragraph 2 as follows:</p> <p>"The level of domestic recycling is high and the amount of waste produced is greatly reduced."</p> <p>Suggests adding in wording to tenth paragraph as follows:</p> <p>"There are bus priority measures, an extensive cycle route network, and all residential roads have a 20 mph limit. There has been a significant shift from car use to more sustainable forms of transport."</p>	The additions suggested are considered pertinent and a form of this wording could be added to the relevant sections of the Spatial Vision to make it more robust.
Campaign to Preserve Rural England	CSPO303	6. Spatial Vision	Considers that the Vision is "Pie In The Sky." Expresses confusion over the use of the present tense.	Noted. However, the purpose of the Vision is to provide a snapshot of what the District will be like in 2026. This is why it is described in the present tense. The Vision also needs to be aspirational to provide the context for the future planning of the District.
Worcestershire Wildlife Trust	CSPO92	6. Spatial Vision	Support for the Spatial Vision and the strong emphasis placed on Green Infrastructure and Biodiversity Enhancement. Welcome comments	Support is welcomed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			relating to SUDs and sustainable building practices.	
Wyre Forest District Council	CSPO349	6. Spatial Vision	Considers the Spatial Vision should also identify solar hot water and passive solar power as key forms of renewable energy.	Noted. It is considered that paragraph 2 of the Spatial Vision could be amended to incorporate these forms of renewables.
Wyre Forest District Council	CSPO352	6. Spatial Vision	Worcestershire County Council's study has identified the potential for larger scale technologies.	Worcestershire County Council's renewables study will form part of the LDF Evidence Base. It is considered that Paragraph 2 of the Vision would cover this potential.
Wyre Forest District Council	CSPO353	6. Spatial Vision	Considers that the Spatial Vision should refer to Wyre Forest as a Low Carbon District.	Noted. It is considered that this wording could be incorporated into Paragraph 2 of the Spatial Vision.
West Midlands Safari Park	CSPO186	6. Spatial Vision	Considers that the vision fails to recognise that tourism will continue to play an important part of the District's economy. Specific reference should be made to its vital role in job retention and creation in the 8th paragraph of the Vision. Considers that the West Midlands Safari and Leisure Park is vital to the District's economy.	The role of the individual towns of Kidderminster, Stourport-on-Severn and Bewdley in terms of visitor attractions are highlighted in the vision. However, it is considered that the important role of sustainable tourism in the local economy could be explicitly referred to in Paragraph 8 of the Vision.
Kidderminster Property Investments	CSPO283	6. Spatial Vision	Supports the general content of the Spatial Vision. Considers that all of the aspirations set out in the Vision will need to be assessed on a site by site basis with consideration afforded to viability. The District Council should try to ensure that development	Support for the Spatial Vision is welcomed. Viability Assessments for key sites are to be undertaken as part of the Evidence Base to inform the Site Allocations and Policies DPD.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>aspirations are deliverable within the LDF Period.</p> <p>Considers that the residential regeneration of the Churchfields North component to the Spatial Vision can make a significant contribution to the regeneration of Kidderminster.</p>	
Shaylor Construction Ltd	CSPO111	6. Spatial Vision Para 6.1	Support for the vision and the identification of Kidderminster Town Centre as a focus for leisure, retail, employment and housing developments. Considers that the vision encourages Kidderminster as a visitor destination through an improved evening economy and providing further hotel accommodation within the Town Centre. Considers that it should also be promoted as a sustainable location for residential development, particularly in relation to the provision of Extra Care dwellings.	Support is welcomed.
A R Price	CSPO363	6. Spatial Vision Para 6.1	Support for Spatial Vision. Particularly the role that the larger villages of the District, including Cookley, play in providing key local services and that the rural areas are well served by a sustainable transport network.	Support is welcomed. However, it should be noted that the Spatial Vision relates to the future of the District and how it will look in 2026, rather than its current characteristics.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Advantage West Midlands	CSPO471	7. Spatial Objectives	Considers that access to jobs and services is a particular issue to the development of sustainable communities and that the development of a sustainable transport network will be a key goal. Access to enabling infrastructure such as efficient broadband will affect the success of rural businesses and influence the delivery of Spatial Objective 2.	The comments in relation to the delivery of the Objectives are noted.
Environment Agency	CSPO512	7. Spatial Objectives	Amend Spatial Objective 6 to read "Safeguard and enhance natural resources..."	Noted and agreed.
Natural England	CSPO451	7. Spatial Objectives	Natural England fully supports these Objectives.	Support is welcomed.
English Heritage	CSPO422	7. Spatial Objectives	In our response to the Revised Issues and Options Paper we supported the need for a dedicated objective on the historic environment in view of the 'District's distinctive historic environment resources, their importance to the main towns' distinctive identities, and the opportunities they offer for the regeneration of the area'. We also offered a possible approach for the objective. We remain of the view that a more place-specific objective on the historic environment is required to flow from the spatial portrait and vision.	Noted. The District's historic environment plays a key role in its local distinctiveness. It is considered that an additional Spatial Objective relating to the historic environment could be included within the Submission Core Strategy document.
Worcestershire County Council	CSPO214	7. Spatial Objectives	Considers that the objectives should be amended to reflect the importance of	Noted. It is considered that Objective 5 could be amended to

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>green infrastructure.</p> <p>Considers that Objective 5 should be reworded as follows:</p> <p>"...natural and historic environment."</p> <p>The focus on new developments within Objective 10 may suggest that improvements to existing infrastructure are not being considered which is misleading.</p>	<p>include reference to enhancing the District's Green Infrastructure Network. It could also be reworded to incorporate the wording as suggested by the County Council.</p> <p>The comments on Objective 10 are noted and accepted. It is considered that this Objective should be reworded to reflect the need for improvements to existing infrastructure</p>
West Mercia Constabulary Police HQ	CSPO327	7. Spatial Objectives	<p>Support for the Spatial Objectives, particularly Objective 12 as it provides a genuine linkage with the LAA Objectives. Clearly planning for community safety, and by extension the emergency services, is intrinsic to the planning process.</p> <p>PPS 3 states that local authorities should ensure that developments are safe and also requires that the locations for new housing should ensure that they are accessible to local community infrastructure and services i.e. policing.</p> <p>PPS 6 states that local authorities should consider the scale of leisure developments to take account of their cumulative impact on anti-social behaviour, crime and the</p>	Support for Objective 12 is welcomed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			amenities of nearby residents. Objective 12 recognises the importance of maintaining Wyre Forest District as a relatively low crime area and has a clear basis in national guidance.	
Herefordshire & Worcestershire Earth Heritage Trust	CSPO135	7. Spatial Objectives	Support the inclusion of objective 7.	Support is welcomed.
Kidderminster Civic Society	CSPO483	7. Spatial Objectives	Objectives seem reasonable. Spatial Objective 10 could recognise the use of the Canal and River for freight purposes.	Noted. Objective 10 refers to the promotion of sustainable freight transport. The use of the canal and rivers for these purposes would need to be further developed through Core Policy Areas if it could be demonstrated that this is deliverable and viable within the plan period.
Worcestershire Biodiversity Partnership	CSPO72	7. Spatial Objectives	Spatial Objective 7 is supported.	Support is welcomed.
Worcestershire Greenpeace	CSPO63	7. Spatial Objectives	Highlights a number of issues relating to the spatial objectives. Considers that the objectives should specifically address how the District will become more resilient to very high oil prices. They should also refer to recycling and repair/reuse businesses.	These important points are noted. It is considered that Objectives 6 and 10 specifically address these points. Detail is addressed within the Core Policy areas of the document and these flow from the Spatial Objectives.
West Midlands Region RSL Planning Consortium	CSPO37	7. Spatial Objectives	Support for the spatial objectives but recommends amendment to the first objective to read as follows:	Agreed. Amend Objective 1 as stated.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			1. To provide a range of high-quality, high energy efficiency <u>market and affordable</u> housing options for residents of all ages <u>and needs</u> to achieve sustainable communities.	
The Inland Waterways Association (Birmingham, Black Country & Worcestershire Branch)	CSPO155	7. Spatial Objectives	There is no Spatial Objective to locally generate green energy. National and regional policy actively encourages the movement of freight by sustainable means. There is no specific objective to include the River Severn for freight movement.	The Spatial Objectives are intended to provide a basis for Core Policy development and should not be specific. Spatial Objective 10 refers to the promotion of sustainable freight transport. This will be further developed through the Core Policies.
Wyre Forest Friends of the Earth	CSPO54	7. Spatial Objectives	Suggests amendment to Objective 10 as follows; 10. <u>Support the introduction of a district wide 20mph default speed limit and the development of an accessible, integrated, sustainable transport network through new developments to produce a low carbon transport system and to promote sustainable freight transport.</u>	It is considered that this addition would be too detailed for the overarching spatial objectives. It is relevant to the Worcestershire Local Transport Plan and is not currently set out within LTP2.
Centro- WMPTA	CSPO97	7. Spatial Objectives	Support for the overall Spatial Vision and Objectives. Emphasises strong correlations with the WMRSS, the Regional Transport Strategy and the West Midlands Local Transport Plan.	Support is welcomed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Council for British Archaeology West Midlands	CSPO82	7. Spatial Objectives	Considers that there needs to be a separate objective on safeguarding and enhancing the historic environment. Currently implies that it is a consideration in rural areas only and not in towns.	Noted. This will be considered further in the development of the submission document and in light of English Heritage's response.
Campaign to Preserve Rural England	CSPO304	7. Spatial Objectives	Considers that Kidderminster is a strategic centre for the wider area, in accordance with WMRSS policy PA11. The wording of Objective 3 should be changed to <u>"for the District and beyond."</u>	Noted and agreed.
Worcestershire Wildlife Trust	CSPO93	7. Spatial Objectives	Support for the spatial objectives, particularly 7 and 8.	Support is welcomed.
Wyre Forest District Council	CSPO370	7. Spatial Objectives	Suggests additional wording to Objective 7. "Identifying wildlife corridors both for wetland and dry acid communities to allow north south migration of species to mitigate the effects of climate change. Linking sites and corridors to create wild landscapes."	Noted. There are useful comments which will be progressed further through Core Policy development on Green Infrastructure and through the Green Infrastructure Study. They are considered too detailed for inclusion within the Spatial Objectives.
Bovale Limited	CSPO21	7. Spatial Objectives	Support for objectives.	Support is welcomed.
West Midlands Safari Park	CSPO187	7. Spatial Objectives Spatial Objective 2 - The District's Economy	Support for Spatial Objective 2. Consequently the Core Strategy should support the sustainable development of existing businesses. The West Midlands Safari and Leisure Park is one of the District's largest employers. It is the Park's intention to continue to expand and create	Support is noted. The Core Strategy Preferred Options Paper places emphasis on the role of sustainable tourism to the future of the local economy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			additional jobs. An appropriate policy framework is required recognising the relationship between tourism and employment.	
Kidderminster Property Investments	CSPO285	7. Spatial Objectives	<p>Support for the objectives and considers that the residential regeneration of Churchfields North is consistent with the spatial objectives. However, suggests that an additional spatial planning objective should be included to prioritise the regeneration of Kidderminster as follows:</p> <p>"To provide the urban regeneration of Kidderminster as the District's principal town, with priority given to the redevelopment of derelict industrial sites and other brownfield sites within the settlement boundary."</p>	<p>Support for the Spatial Objectives is welcomed.</p> <p>It is considered that Objective 3 highlights the importance of Kidderminster as the Strategic Centre. The Objectives set the context for the development of the Spatial Strategy and Core Policies. The wording suggested by the respondent for an additional objective is fully reflected within the Preferred Option for the Spatial Strategy for the future development of the District.</p>
Shaylor Construction Ltd	CSPO112	7. Spatial Objectives	<p>Support the recognition of the need to provide housing for all sectors of the community. Considers that Extra Care housing should be recognised for its contribution to freeing up existing housing stock.</p> <p>Support for Objective 2.</p> <p>Considers that the historic context of Kidderminster Town Centre should be</p>	<p>Support for Objectives 1 and 2 is welcomed.</p> <p>It is considered that the historic environment is essential to the local distinctiveness of the District and town centres. It should be a key consideration in regeneration proposals.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			integrated into new developments and not safeguarded by way of preservation.	
A R Price	CSPO364	7. Spatial Objectives	Overall support for the objectives. However, Objective 4 fails to recognise the need for appropriate limited growth within the villages. There is the potential with Spatial Objective 5 for some conflict. Whilst the general intention is that the Green Belt should not be subject to a wide spread revision, the spatial objective should recognise that there may be a need for appropriate minor amendments to Green Belt boundaries or identified ADRs, to fulfil the other objectives within the rural areas.	<p>These comments are noted. The Spatial Strategy focuses the majority of new development on urban brownfield sites in accordance with the emerging Regional Spatial Strategy. There is the potential for small scale housing sites to be allocated within the rural settlements in accordance with local housing needs. It is not considered that this would require a review of the Green Belt Boundary.</p> <p>The viability and deliverability of development on the ADRs is being considered through the Strategic Housing Land Availability Assessment (SHLAA) which will form important background evidence to the Local Development Framework.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Government Office for the West Midlands	CSPO200	Spatial Strategy - General	The options proposed appear to be realistic and set out general policy directions. This is a better approach than simply setting out draft policy wording at this stage. In the publication document we would expect to see the approaches developed into a strategy rather than a set of individual policies.	GOWM's comments and support for the general policy directions are noted.
Government Office for the West Midlands	CSPO203	Spatial Strategy - General	Recognised the need for the Core Strategy to be flexible particularly in relation to cross boundary issues with the South Worcestershire authorities, which will have an influence on the development strategy for the Wyre Forest Core Strategy. However also need to consider flexibility in terms of potential changes in housing numbers.	Noted. The Strategic Housing Land Availability Assessment (SHLAA) will form a vital piece of evidence to inform the LDF. This looks at the capacity of sites within the District to accommodate new housing growth. It is noted that the Panel Report arising from the RSS Phase 2 Examination In Public is expected to be published in September 2009 and this will inform the Submission Core Strategy document.
West Midlands Regional Assembly	CSPO391	Spatial Strategy - General	The Preferred Option Core Strategy does not demonstrate that it has the flexibility to accommodate any additional growth that may be allocated to the District in the WMRSS Phase 2 Revision. The Submission Version of the Core Strategy should therefore consider and respond to any future recommendations coming from the EiP Panel that may affect the District with regard to both the quantity and location of any housing and employment	Noted. Pages 16 - 18 of the Core Strategy set out the alternative scenarios that have been tested. The Submission Version of the Core Strategy will take full account of the recommendations from the EiP Panel that are expected to be published in September 2009.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			growth.	
Environment Agency	CSPO515	Spatial Strategy - General	Considers that mention should be made of the associated costs and complications that may arise due to contaminated land issues and the restrictions that may need to be imposed. The LPA and developers should be aware of this requirement as lack of up front information could slow the planning process significantly and impede delivery of the LDF.	Noted. This is a useful consideration for the Implementation Plan that will accompany the Submission Core Strategy.
Natural England	CSPO452	Spatial Strategy - General	Support for the spatial strategy.	Support is welcomed.
Worcestershire Greepeace	CSPO64	Spatial Strategy - General	<p>Considers that increasing shopping opportunities is not the only way to increase the wellbeing of the District. Given the recession, and likely havoc in the international financial system for many years, will there be the shops to attract? Will people have the money to spend?</p> <p>There is plenty of research to show that people are not made happier by consuming more, they are made happier by social interactions, meeting and helping others, and by exercising their bodies and minds. Not increasing opportunities to shop is also a way to reduce waste, and to reduce the ecological footprint of residents.</p>	Noted. It is agreed that a balance is very important. The Core Strategy advocates Green Infrastructure provision and enhancement as an important element in regeneration for the District. This will promote further opportunities for health and wellbeing.
Campaign to Preserve Rural	CSPO305	Spatial Strategy – General	Accepts the general thrust of Policy DS01 but have reservations as to the necessity	These concerns are noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
England			of so much extra retail space.	
West Midlands Regional Assembly	CSPO392	Spatial Strategy - Housing Settlement Hierarchy	The Settlement Hierarchy set out in table 8.2 accords with paragraph 3.65 of the emerging WMRSS Spatial Strategy in respect of Worcestershire and also the relevant emerging WMRSS policies concerning retail, offices, commercial leisure, local services and residential developments.	Support is welcomed.
Environment Agency	CSPO513	Spatial Strategy - Housing para 8.11	Paragraph 8.11 should be replaced with "in flood zone 1 (low probability)" i.e. outside of flood zones 2 and 3.	Noted. The Submission Core Strategy document will not include the alternative strategic spatial options considered.
Environment Agency	CSPO514	Spatial Strategy - Housing para 8.12	Paragraph 8.12 it should be made clear here that "infrastructure" includes foul drainage and water supply as well as physical infrastructure such as roads.	Noted and agreed. This will be fully considered in the Infrastructure and Implementation Plan to accompany the Core Strategy.
Environment Agency	CSPO517	Spatial Strategy - Housing Para 8.39	Recommends early engagement with the EA to assess the potential for contamination and to secure the viability of future redevelopment.	Noted and agreed.
Worcestershire Greepeace	CSPO65	Spatial Strategy – Housing Para 8.18	Queries the use of the word sustainable in the context of urban extensions.	The use of the word sustainable here refers to the Sustainability Appraisal (SA), which was used to appraise the alternative option to accommodate higher levels of housing growth through Greenfield urban sites or extensions. Sustainability Appraisal of this option established that if implemented it would

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
				have a significant impact on greenfield land, biodiversity and geodiversity and would not provide the most sustainable development option.
West Midlands Region RSL Planning Consortium	CSPO38	Spatial Strategy - Housing Para 8.5	Support for paragraph 8.5.	Support is welcomed.
West Midlands Region RSL Planning Consortium	CSPO40	Spatial Strategy – Housing Table 8.2	Objects to settlement hierarchy. Suggests that all villages should be considered for rural exception schemes as all should be weighed on individual merits. Seeks clarification on the clause "in appropriate circumstances" (these should be set out in the supporting text).	Noted. The rural settlements identified in the settlement hierarchy are those which are currently included in the Adopted Local Plan as insets on the Proposals Map. It is considered that further thought should be given to including other rural settlements which are washed over by the Green Belt. If a housing need was identified through a Parish Survey in one of these settlements and a suitable site was supported by the relevant Parish Council then it could be allocated for affordable housing to meet local needs only. It is agreed that appropriate circumstances should be clearly set out in an accompanying footnote to the table.
Campaign to Preserve Rural England	CSPO307	Spatial Strategy - Housing Para 8.6	Considers that the Core Strategy should explicitly state that expansion to the south of Stourport on Severn into the Astley and Dunley Parish is considered unnecessary	Noted. It is agreed that the expansion of Stourport on Severn into the Astley and Dunley Parish is not required to serve the development needs of the District as

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			for the foreseeable future. This is supported by the WMRSS.	specified in the RSS.
Campaign to Preserve Rural England	CSPO308	Spatial Strategy - Housing Para 8.14-15	<p>Considers that the Core Strategy should provide means of distinguishing acceptable windfall sites. The argument that these small developments fail to provide social contributions to infrastructure is a false one, unless there are thresholds below which no contribution is required. A better solution is to have no threshold, but to provide for contributions in lieu of actual provision on the smallest sites.</p> <p>It is accordingly vital that specific criteria enabling the suitability of windfall sites for development should appear in the Strategy.</p>	<p>Noted. The Council is undertaking an extensive Strategic Housing Land Availability Assessment (SHLAA), which considers all those sites likely to come forward for development in the future, sites identified in the Employment Land Review Process and those put forward by landowners for possible development in the future.</p> <p>A Core Policy on housing choice will set out the thresholds and requirements for contributions to affordable housing.</p>
Campaign to Preserve Rural England	CSPO309	Spatial Strategy - Housing para. 8.14-16	<p>Concerns relating to the over development of gardens and back land due to the definition of Previously Developed Land which includes back gardens.</p> <p>Considers that the Core Strategy should develop a means of classifying different types of brownfield land. This should enable a rational, sequential approach to be adopted for selecting brownfield and other urban sites for future development.</p>	These concerns are noted and are highlighted in the Local Distinctiveness Core Policy Area. They will also be addressed through Revised Design Guidance based on Residential Areas Character Classification.
Campaign to	CSPO310	Spatial Strategy	Support for the settlement hierarchy.	Support is welcomed. The comments on

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Preserve Rural England		- Housing Para. 8.23 - 8.30	<p>Considers that Bewdley should be identified as an historic market town and should develop less than Kidderminster and Stourport-on-Severn. The four larger villages are correctly identified but should be called "Large Villages"</p> <p>A small percentage of new development should be left for "rural exception" housing sites and for barn conversions and the like. Perhaps this could be resolved by each town being provided with a minimum percentage and rural site with a maximum of (say) 5%. For the avoidance of doubt the percentages given should total 100%.</p>	<p>the settlement hierarchy are noted and will be considered when developing the Core Strategy Submission document.</p> <p>The indicative development allocations are indicated as indicative ranges only at this stage. These require further clarification through the SHLAA process. The Submission Core Strategy will provide a total of 100% based on the findings of the SHLAA process.</p>
Marston's PLC c/o First City Ltd	CSPO129	Spatial Strategy – Housing Table 8.2	<p>Support for the settlement hierarchy and Cookley as a named village which is an appropriate location for local services.</p> <p>Considers that this should include a mix of housing provision including a variety of tenures and types.</p>	Support is welcomed.
Tesco Stores Ltd	CSPO246	Spatial Strategy - Housing Paras 8.20 & 8.21	Considers that the Settlement Hierarchy set out at Table 8.2 reflects the emerging RSS and identifies Stourport on Severn as appropriate for convenience A1 retail development.	Support is welcomed.
WM Morrison Supermarkets Plc	CSPO177	Spatial Strategy – Housing Settlement	Supports the identification of a retail hierarchy for the District with Kidderminster as a local regeneration area.	Noted and agreed. The Retail Update Study is currently being commissioned and will help to determine these

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		hierarchy	Note that the document does not state the level of appropriate floorspace for convenience retail within the three main centres of Kidderminster, Stourport and Bewdley. Considers that the Core Strategy should contain a realistic summary of the need for convenience and comparison retail which will be informed by the Council's Retail Study. This is required by the guidance set out in PPS 6.	floorspace requirements for the Submission Core Strategy Document.
Kidderminster Property Investments	CSPO287	Spatial Strategy - Housing	Considers that the Spatial Strategy is consistent with the emerging WMRSS and supports it. Churchfields North can provide a significant contribution towards the strategic housing growth requirement for Kidderminster.	Support is welcomed.
KPI and Asda Stores Ltd	CSPO47	Spatial Strategy - Housing 8.11-8.12	The principle of a significant element of growth taking place at Churchfields is fully supported. It is considered that the site will be brought forward and redeveloped in its entirety during the Plan period.	Support is welcomed.
British Sugar Plc	CSPO362	Spatial Strategy - Housing	Concerns over the impact of the economic recession on the development industry. Urges the Council to add more flexibility to the Core Strategy to be able to react quickly to a change in national or regional policy. We would also advocate identification of a greater level of land for the provision of housing and employment,	Noted. The Core Strategy must be in general conformity with the emerging WMRSS. The alternative scenarios that were appraised and considered are set out at pages 16 - 18.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			to acknowledge the fact that some preferential sites may not be viable for a variety of reasons discussed through these comments.	
A R Price	CSPO369	Spatial Strategy - Housing Table 8.2	<p>General support for the settlement hierarchy set out in table 8.2. The plan could usefully clarify where it describes housing to meet local needs as appropriate, that those local needs extend to market as well as affordable housing.</p> <p>It is also noted that the settlement hierarchy omits reference to Wolverley.</p>	<p>"Housing to meet local needs as appropriate" relates to affordable housing provision within the rural areas. A local housing need should be established in consultation with the relevant Parish Council.</p> <p>The settlement hierarchy will be revised accordingly within the Submission Core Strategy Document although care is needed as Wolverley is washed over by Green Belt. The Area of Development Restraint identified at Fairfield would serve to meet Wolverley's housing needs.</p>
A R Price	CSPO371	Spatial Strategy - Housing Paragraph 8.25	Notes concerns raised during Issues and Options consultation over the limitation of development within the District's larger villages.	Noted. The Core Strategy must be in general conformity with the emerging Regional Spatial Strategy.
Mr Robin Pearson	CSPO5	Spatial Strategy - Housing	Concerned that the indicative percentage for future development to be targeted towards green field sites in the District has not been outlined by the Council. The Council cannot be protecting the Green Belt at the same time it is allowing building on it.	The Core Strategy Preferred Options Paper sets out the District Council's intention to locate the majority of new residential development on brownfield sites. Whilst a very small amount of green field or Green Belt land may be required to meet affordable housing

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
				needs which can be demonstrated within particular communities, the overall policy direction is to safeguard the Green Belt and greenfield land.
Mr C P Bolton	CSPO10	Spatial Strategy - Housing	Safeguard Green Belt between Franche and Wolverley to retain Wolverley as a separate village.	The emerging Core Strategy places great emphasis on retaining the integrity of the Green Belt within the District.
West Midlands Regional Assembly	CSPO393	Core Policy DS01	<p>This approach accords with emerging WMRSS policies CF2B, CF2C and CF5. The policy however should make clear that development in the rural areas should also give priority to brownfield land, in line with emerging WMRSS Policy CF5.</p> <p>The Submission Version of the Core Strategy should indicate what the phasing requirements for housing provision will be in order to meet the district's trajectories for house building under emerging WMRSS Policies CF3 and CF4. It should also indicate the approach to be taken to windfalls in accordance with emerging WMRSS Policy CF10 B iii).</p>	Noted. These comments are useful and detailed consideration will be given to them when developing the Submission Core Strategy DPD. The policy on phasing will be informed by the Strategic Housing Land Availability Assessment (SHLAA) which is currently being undertaken.
Natural England	CSPO453	Core Policy DS01	Support for policy DS01. However the existing value of brownfield land must not be overlooked and should be protected and enhanced as part of any redevelopment within the context of green infrastructure.	These comments are noted. The Green Infrastructure Study will help to ensure the protection and enhancement of key sites. The Landscape Characterisation Study which is being progressed by WCC will also help to inform the submission version of the Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>Fully endorse the use of the findings from consultation and Sustainability Appraisal as justification for the policy direction and hope to see this focus continued.</p> <p>In the consideration of alternative options there is repeated assumption that Greenfield land, especially Green Belt land has high landscape quality and biodiversity value. This may not always be the case. Advocate an evidence led consideration of the quality of areas being considered for development. Hope that the developing Green Infrastructure Study will provide this evidence.</p>	<p>The Core Strategy must not conflict with National Planning Policy set out in PPG 2 Green Belts and it is also important to retain strategic gaps between the three main towns to retain their integrity and roles. This is central to the whole development strategy and the Spatial Vision.</p> <p>The District Council is keen to ensure that green infrastructure retention and enhancement is at the heart of regeneration proposals for the area.</p>
English Heritage	CSPO423	Core Policy DS01	In accommodating developing both on brownfield land and any greenfield allocations, potential impacts on the historic environment, including the character of the historic landscape must be taken into account. We would be happy to discuss in more detail sites specific issues and opportunities as they come through the Site Allocations DPD.	Noted and agreed.
Worcestershire County Council	CSPO215	Core Policy DS01	<p>Considers that policy DS01 should be clear that to meet local needs brownfield land should be used before greenfield land.</p> <p>No allowance has been made for windfall</p>	These comments are useful. WCC are reminded that the Core Strategy Preferred Options Paper does not set out draft policy wording - it is not a draft Core Strategy. Rather it sets out a direction for possible policy wording. At this stage the

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>sites within the policy wording. The DPD should indicate the approach that is to be taken with regards to windfall sites.</p> <p>The Core Strategy should also include the phasing approach for housing.</p> <p>The Churchfields area is not served by public transport and new development must connect the area with Kidderminster town centre and the rail station.</p>	Evidence Base has yet to be completed including the Strategic Housing Land Availability Assessment (SHLAA) which will inform the phasing approach taken within the Core Strategy. The Kidderminster Public Transport Study which is being undertaken by the County Council, will inform the scope of transport infrastructure that is required to support the redevelopment at Churchfields, Kidderminster.
Worcestershire Primary Care Trust	CSPO549	Core Policy DS01	PCT does not envisage difficulty in providing NHS facilities to support the planned residential growth. Within Kidderminster there are comprehensive redevelopment plans for improved healthcare provision on Bromsgrove Street and the Kidderminster Hospital Site. Within, Stourport the PCT would work to increase primary care provision if required.	Noted. This is important information relating to infrastructure delivery and the Implementation Plan for the Local Development Framework.
Highways Agency	CSPO336	Core Policy DS01	Support for Policy DS01. Considers that this will promote more sustainable patterns of development that reduce the need to travel and offer opportunities for the use of sustainable modes.	Support is welcomed.
West Mercia Constabulary Police HQ	CSPO328	Core Policy DS01	Supports the overall principle of Policy DS01. However, it does not reflect the need to ensure that the sites chosen are covered by existing infrastructure or in	These comments are considered to be very useful and constructive. The suggested rewording will be further considered for the development of the

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>locations where new infrastructure can be easily provided. Considers that the policy wording needs to be amended to reflect this. Having such a reference is therefore essential to ensuring that the basis for seeking such obligations is firmly embedded in the development plan. Suggests rewording as follows:</p> <p><i>"Accommodate development in line with RSS Draft Preferred Option for 3,400 dwellings on urban brownfield sites supported by essential infrastructure and public services principally within Kidderminster..."</i></p> <p>Supports the concentration of development on a small number of large sites, rather than on a large number of small sites scattered throughout the District. The scale required to support West Mercia Constabulary's infrastructure for a dispersed built environment pattern would be excessive and would create locations on the fringe of response times.</p>	Submission Core Strategy document. They will also help to inform the Implementation Plan that needs to be developed for the Local Development Framework.
Wychavon District Council	CSP0125	Core Policy DS01	Support for Core Policy DS01.	Support is welcomed.
Wychavon District Council	CSP0131	Core Policy DS01	Future residential/employment proposals that border Wychavon District particularly at Summerfield, Hartlebury and Torton	Noted. The areas referred to fall within the Wychavon District and as such would be covered by the South Worcestershire

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>should take into consideration the impact this will have for car generated trips and HGV movements.</p> <p>The cross boundary issue of public transport improvements will also need to be taken into consideration.</p> <p>Drainage and surface water run off issues need to be taken into consideration.</p>	Joint Core Strategy. However, the cross boundary issues raised are important in relation to traffic generation and the impact on the local road network and the possibilities for increased surface water run off from new development.
Bewdley Town Council	CSPO544	Core Policy DS01	Services and infrastructure in Bewdley would not support a large expansion in house numbers. The design of the town and position on the river also limits opportunity for development.	Noted and agreed.
Kidderminster Civic Society	CSPO484	Core Policy DS01	Agree it is sensible to deal with preferred growth in the Clensmore area in the KCAAP to give flexibility.	Support is welcomed.
West Midlands Region RSL Planning Consortium	CSPO39	Core Policy DS01	<p>Objects to Core Policy DS01 as the potential for higher housing figures proposed by the Nathaniel Lichfield and Partners Report (2008) has not been taken into account. Note the prioritisation of brownfield land as important, but strongly recommends a review of ADRs and Green Belt land allocation.</p> <p>Considers the SHMA indicates potential for smaller rural villages to support rural exception site development to meet local</p>	Noted. At the time of the Core Strategy Preferred Options Paper consultation the additional 400 dwellings put forward in the Nathaniel Lichfield and Partners study is yet to be considered at the RSS Phase 2 EIP. It is expected that the Panel Report will be published in September 2009. The Submission Core Strategy will need to reflect the findings of the Panel Report. The Strategic Housing Land Availability Assessment (SHLAA) will determine which sites would

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			demonstrated need for affordable housing. Considers that the removal of ADR and Green Belt land as suggested in the alternative strategic spatial options should be reviewed. Feels that reliance on windfall sites is unsustainable.	be deliverable and viable for affordable housing within the rural settlement during the plan period.
The Inland Waterways Association	CSPO156	Core Policy DS01	Support for Policy DS01 - house building on brownfield sites.	Support is welcomed.
Campaign to Preserve Rural England	CSPO306	Core Policy DS01	Support the general trust of this strategy. However, would be happier if development were linked to what is needed locally. Perhaps be related to a less restrictive definition than that for local needs in WMRSS. Considers that the policy should be drafted so it would be possible to meet demands arising from inward migration.	These concerns are noted.
Worcestershire Wildlife Trust	CSPO94	Core Policy DS01	Development in accordance with the distribution hierarchy suggested in the RSS is sensible and ought to offer the most sustainable option for growth. Welcomes the strong commentary in paragraph 8.9 regarding the need for careful assessment of environmental impacts. Reiterates concerns about the level of Green Infrastructure provision within the built environment.	Noted and agreed.
Marston's PLC c/o First City Ltd	CSPO128	Core Policy DS01	Considers that greater emphasis should be given to those villages which provide a	Noted. Further development within the villages and rural settlements would need

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>range of services and facilities.</p> <p>Development within or adjacent to appropriate service centres can help to support existing services and facilities and to strengthen the local community. Considers that the policy wording should be amended as follows:</p> <p>"Accommodate development in line with the RSS Draft Preferred Option for 3,400 dwellings on allocated urban brownfield sites principally within Kidderminster but also within Stourport-on-Severn. Limited opportunities for development, including affordable housing to fulfil local needs will be identified within Bewdley and the villages. Where local need can be demonstrated, affordable housing will also be appropriate on sites within or adjacent to the rural settlements."</p>	<p>to be to meet local housing needs only to be in general conformity with the emerging Regional Spatial Strategy.</p> <p>The policy wording is to be finalised within the Submission Core Strategy document and will be further considered based on the outcome of the Panel Report from the RSS 2 Examination In Public.</p>
Revelan Group	CSPO240	Core Policy DS01	<p>Object to Policy DS01. As the outcome of the RSS Revision process is presently unknown it is suggested that the first sentence of the draft policy be amended to state:</p> <p>"Accommodate development in line with RSS requirements on allocated urban brownfield sites principally within</p>	<p>These comments are noted. However, the respondent is reminded that the Core Strategy Preferred Options Paper's role is not to be viewed as a Draft Core Strategy. Rather it is an indication of the Council's preferred strategy for future strategic development patterns based on the emerging RSS. The Submission Core Strategy Document will contain draft</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>Kidderminster but also within Stourport-on-Severn"</p> <p>The supporting text could also be modified to explain that the Submission RSS Revision proposed the development of 3,400 dwellings, but the actual requirement is yet to be established.</p>	policy wording and will be based on the latest guidance arising from the RSS Phase 2 Panel Report.
Kidderminster Property Investments	CSPO289	Core Policy DS01	<p>It is considered that the preferred option DS01 provides greater opportunity for the whole of Kidderminster as well as Churchfields/Clensmore/Stoney Lane. It is noted and welcomed that these sites are progressed through the Site Allocations and KCAAP, which we have made representations on under separate cover.</p> <p>The focus of residential growth within Kidderminster will enhance its strategic role and attract inward investment in retail, leisure, business and commercial uses.</p>	Support is welcomed.
Stanmore Properties Ltd	CSPO81	Core Policy DS01	<p>No objections to the general principles of the policy. However evidence that there is sufficient PDL available to meet the overall housing requirement should be provided in the submission document. The policy should also identify what will happen if there is insufficient PDL available and in this case the Council should look to develop the existing ADRs, with ADRs on</p>	Noted. A Strategic Housing Land Availability Assessment (SHLAA) is currently being undertaken which looks at the viability and deliverability of sites for future housing development across the district. This will provide important evidence to inform the Spatial Strategy at its submission stage.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			the edge of Kidderminster being brought forward first.	
Shaylor Construction Ltd	CSPO113	Core Policy DS01	The aim of Policy DS01 is supported so that Kidderminster Town Centre becomes a focus for retail, leisure and office developments and existing brownfield sites are appropriately re-used. However, the reference of this policy to specific allocated sites may actually restrict development of uses in the most appropriate locations whilst also prioritising empty sites on the edge of the Town Centre above those that have existing buildings or more specifically Listed Buildings that can not be demolished. The reference to allocated sites should be amended to include other appropriate locations within the Town Centre area so that the conversion of Listed Premises is not excluded.	Noted. Sites must be allocated within the Site Allocations & Policies and Kidderminster Central Area Action Plan Development Plan Documents. The KCAAP includes key sites within Kidderminster and includes listed premises for retention and enhancement. It is considered that the historic environment should be an integral part of regeneration proposals.
British Sugar Plc	CSPO365	Core Policy DS01	Questions whether a policy based on the RSS Draft Preferred Option would be suitably robust. The current wording lacks flexibility. Suggest wording of the policy: <i>"Accommodate development in line with current RSS aspirations for the District..."</i> Affordable housing provision and development in general could be inhibited due to potential issues in terms of	The respondents are reminded that the Core Strategy Preferred Options Paper is not intended to be a Draft Core Strategy. The policy wording sets out the preferred direction for the policy based on the RSS Phase 2 Draft Preferred Option. It is recognised that the submission document will need to be altered based on the Panel Report on the RSS Phase 2.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>economic viability of previously developed land. Costs associated with reclamation of contaminated land or other unforeseen factors can impede development or the fact that in some places residential land values have fallen below commercial.</p> <p>We believe that the policy should be worded to allow suitable flexibility, should priorities change in the future and to avoid complications associated with proposals that 'depart from the Local Plan'.</p>	<p>In addition pages 16-18 of the document set out the alternative scenarios that have been considered should a higher level of growth be allocated to the District.</p> <p>A SHLAA is being undertaken which looks at deliverability and constraints for all sites put forward for consideration for housing development by the Council. This will establish the availability of brownfield sites within the District for delivery during the plan period.</p>
A R Price	CSPO366	Core Policy DS01	Objects to Policy DS01. This appears to exclude all but affordable housing opportunities on sites within the rural settlements. It is considered that the LDF is flawed in making no suitable residential provision within the rural areas of the district through identified sites in the larger rural villages, especially where these have been acknowledged as being sustainable settlements with a core range of local services and facilities available. The failure to do so restricts choice and accessibility to the full range of residential opportunity, contrary to the advice of PPS3, and in a manner in conflict with the guidance of RSS.	Disagree. The proposed policy accords with the emerging RSS Phase 2 and national planning policy. Development within the rural villages and settlements should be to meet local needs only. To allocate sites for market housing within these areas would have an adverse impact on the regeneration of brownfield sites within the main urban areas of Kidderminster and Stourport on Severn. This would run contrary to RSS Policy which seeks to stem levels of out migration from the major urban areas to the surrounding shire towns and rural areas.
Advantage West	CSPO473	Spatial Strategy	The continued focus on employment	Support is welcomed. The District

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Midlands		– Employment	redevelopment in Kidderminster and in particular along the Stourport Road Employment Corridor within the Preferred Options Paper is welcomed. The British Sugar Site will provide a key location site for employment for both the medium and long term. At an estimated 24ha overall, this site is of a size that will be strategically important at the sub-regional level in providing a focus for growth in the core strategy and the Agency would encourage policies that allowed its planned development as a priority.	Council is pleased that AWM views the former British Sugar Site as strategically important at the sub-regional level.
Environment Agency	CSPO516	Spatial Strategy – Employment	Support the remediation of the former British Sugar site. However Desk studies and preliminary risk assessments should be carried out early in order to allow for realistic phasing of development within the lifetime of the plan.	Noted and agreed. This information will help to inform the Implementation Plan for the delivery programme.
Worcestershire Greepeace	CSPO66	Spatial Strategy – Employment	Energy security on sites is important - having local supply networks. Considers that a planning policy is needed on this.	Noted. Core Policy area 15 - Delivering Sustainable Development Standards includes renewable energy generation for new developments.
Mr Robin Hardwick	CSPO175	Spatial Strategy – Employment Paragraph 8.36 SREC	Concerned about the integrity of the Green Belt between Kidderminster and Stourport due to the focus on the Stourport Road Employment Corridor. In addition sports facilities here should be carefully controlled.	Noted and agreed. Retaining the separate identities of the three towns is a key objective for the Core Strategy.
Highways Agency	CSPO347	Core Policy	Support for Policy EG01. This should be	Noted and agreed. These comments will

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		EG01	supported by the development of sustainable transport links to the rural areas and the improvement of rail services and facilities.	help to inform the Implementation Plan that is required as part of the LDF.
West Mercia Constabulary Police HQ	CSPO329	Core Policy EG01	Support for policy EG01. However, considers that it doesn't reflect the need to ensure that the sites chosen are covered by existing infrastructure or are in locations where new infrastructure such as for emergency services, can be easily provided. Recommended amending policy wording as follows: <i>"...Current employment opportunities for Bewdley and in parts of the District's rural areas will be safeguarded. All employment sites will be supported by essential infrastructure and public services. "</i>	These comments are considered to be very useful. The suggested rewording will be further considered for the development of the Submission Core Strategy document. They will also help to inform the Implementation Plan that needs to be developed for the Local Development Framework.
Wychavon District Council	CSPO132	Core Policy EG01	Concerned about the impacts of employment development and increased HGV/Car based trips on Worcester Road and the impact on Summerfield and Hartlebury.	The concerns are noted.
British Waterways	CSPO252	Core Policy EG01	Support for policy EG01 and for the SREC and the redevelopment of waterside sites and the provision of employment opportunities within Stourport on Severn. British Waterways would wish to work with the District Council to develop the required infrastructure.	Support is welcomed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Kidderminster Civic Society	CSPO486	Core Policy EG01	Support for Policy EG01 and the sequential approach mentioned in paragraph 8.35.	Support is welcomed.
Campaign to Preserve Rural England	CSPO311	Core Policy EG01	<p>Support for Policy EG01 but with the following caveats:</p> <ul style="list-style-type: none"> - Vital that the strategic Green Belt gap between Kidderminster and Stourport should be retained and enhanced. Considers that a specific policy should be included in the Core Strategy to safeguard this strategic gap. - The possibility of the former British Sugar Site being developed as a whole for a single strategic industrial occupier should not be ruled out. - Support exclusion of the possibility of Kidderminster growing eastwards. The Offmore and Dunclent areas include a historically important area of agricultural land. 	The comments are noted and support is welcomed. National Planning Policy outlined in PPG2 in relation to Green Belts would remain a material consideration. Government Guidance states that Development Plan Documents should not repeat National Planning Policy.
Worcestershire Wildlife Trust	CSPO95	Core Policy EG01	Support for Policy EG01, but with the same caveats regarding careful consideration of environmental impacts.	Support is welcomed.
Bovale Limited	CSPO23	Core Policy EG01	Support for policy EG01. It is considered that these areas are more ideally suited to accommodate employment land for the modern occupier in comparison to land off Bewdley Road, Stourport which is located within a predominantly residential area and	Support is noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			currently attracts complaints from local residents with regards to noise in its current capacity as an employment site.	
Revelan Group	CSPO241	Core Policy EG01	Considers that Policy EG01's concentration on the SREC for employment uses should not inhibit opportunities to redevelop peripheral employment land on the edge of the corridor for other required land uses, such as housing. The south western edge of the corridor abuts the existing housing area of Birchen Coppice.	Noted. The Council has carried out an extensive three stage process for a District Wide Employment Land Review this has identified some sites which could be considered for alternative uses in the future. The SHLAA, which looks at the viability and deliverability of sites put forward for consideration for housing uses in the future, will also consider those sites identified through the Employment Land Review.
Morbaine Ltd	CSPO239	Core Policy EG01	<p>Considers that the SREC should not remain the main focus for most Class B1(a) office development in the future. The area is poorly equipped to attract Class B1a investment and would appear an inappropriate destination for such land uses. The area suffers from longstanding traffic congestion issues as well as potential site contamination. It is unlikely to prove attractive as an office location as its association with industrial uses is likely to limit the number of occupiers who will locate to this area.</p> <p>Further consideration should be given to providing appropriate land for the</p>	These concerns are noted. In accordance with targets set out in the emerging RSS future office development requirements will be accommodated on sites within or on the edge of Kidderminster town centre. The KCAAP and Site Allocations and Policies DPDs will allocate appropriate sites in these areas for office development.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			development of high quality office development, with regard to the WM RSS target. The SREC is not a suitable location for such development and is unlikely to provide significant, viable office space during the forthcoming planning period.	
Kidderminster Property Investments	CSPO291	Core Policy EG01	Support for Policy EG01.	Support is welcomed.
Hovi Developments Ltd	CSPO51	Core Policy EG01	Existing rural employment sites should be safeguarded with their development and enhancement anticipated and actively encouraged. They are extremely important to provide employment and create new opportunities to sustain rural employment.	Noted and agreed.
British Sugar Plc	CSPO367	Core Policy EG01	Support for Policy EG01.Considers that it would provide employment opportunities close by for a site that they are promoting for residential development at Wilden Lane.	Support is noted.
West Midlands Regional Assembly	CSPO394	Core Policy EGO1/EG01a	Considers that Policies EG01 and EG01a accord with the emerging RSS. The submission version of the Core Strategy should include a policy confirming that the rolling 5 year reservoir and indicative longer term requirements for employment land as set out in the emerging WMRSS will be provided as per policy WMRSS PA6A.	Noted and agreed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Natural England	CSPO454	Core Policy EGO1/EG01a	<p>We support the chosen policy direction, but recommend greater promotion of Wilden Marsh and Meadows Site of Special Scientific Interest (SSSI) as a part of the Stourport Road Employment Corridor and former British Sugar Site redevelopment.</p> <p>Development of the SREC and former British Sugar Site must not negatively impact the SSSI. In addition, we strongly urge that the area's proximity to this site be treated as a two-way opportunity. Redevelopment of this area could enhance the SSSI.</p> <p>By incorporating the SSSI the redeveloped area would be more locally distinctive and attractive; an attractive natural environment is proved to have a positive effect on the local economy, making the area a desirable place to work and thus attracting businesses.</p>	Noted and agreed. The LDF seeks to retain and enhance SSSIs and the emphasis on the SREC should be viewed as an opportunity to achieve this.
English Heritage	CSPO424	Core Policy EGO1/EG01a	All proposed sites must take into account positive and negative implications for the historic environment.	Noted and agreed. This is essential to retain the District's local distinctiveness.
West Midlands Safari Park	CSPO188	Core Policy EGO1/EG01a	Whilst we support the Core Strategy seeking to identify additional employment locations, it should also provide guidance to support the development of existing employment locations. It would be	Noted. The Site Allocations and Policies DPD will identify the major employment areas as informed by the Employment Land Review Study. The development of existing employment locations would

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			beneficial if the Core Strategy were to identify the District's major employment areas and make a commitment to support the appropriate growth of these industries, including the tourism sector.	need to be in accordance with other Core Policies, including the impact of traffic generation and congestion. The Strategy places emphasis on sustainable tourism opportunities and appropriate growth needs to be carefully balanced with sustainable development policies and impact on the Green Belt and landscape character of the area.
Kidderminster Civic Society	CSPO485	Core Policy EG01a	Considers that transport infrastructure needs to be flagged up under policy EG01a. For example the possible use of the SVR Foley Halt which could assist both traffic congestion and pollution and bring in revenue for the SVR.	Noted. Transport Infrastructure is addressed within the "Diverse Local Economy" and "Managing Travel and Transport Demand and Promoting Sustainable Modes" Core Policy Areas.
The Inland Waterways Association	CSPO157	Core Policy EG01a	Welcome Policy EG01a and for sustainable reasons would like to see other such developments targeted alongside sustainable transport corridors (Staffordshire & Worcestershire Canal).	Support is welcomed.
Worcestershire Wildlife Trust	CSPO96	Core Policy EG01a	Imperative that the environmental impacts associated with the development of the former British Sugar Site are properly considered through the planning process. Infrastructure requirements may have an impact on nearby designated sites.	Noted and agreed.
Environment Agency	CSPO518	Spatial Strategy – Office Development Para 8.47	It is important that preference be given for office type development ahead of residential (more vulnerable) in areas of the town centre which lie in flood zones 2	Noted and agreed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			and 3.	
Environment Agency	CSPO519	Spatial Strategy – Office Development Para 8.49	Paragraph 8.49 - recommends that implications of the requirements for "safe" development such as dry flood free access and raised floor levels as detailed in PPS25 are included in this paragraph.	Agreed. However this wording on the Sustainability Appraisal will not be included in the Submission Version of the Core Strategy DPD.
West Midlands Regional Assembly	CSPO396	Core Policy OD01	The Submission Version of the Core Strategy should provide office floorspace figures in line with emerging WMRSS Policy PA13A and paragraph 7.86 of the supporting text.	Noted and agreed. The Submission Core Strategy DPD will be informed by the Retail Update Study to help clarify this.
Advantage West Midlands	CSPO475	Core Policy OD01	Support for Policy OD01. This could assist in meeting the brownfield land regeneration objectives alongside development of other key sites.	Support is welcomed.
Natural England	CSPO456	Core Policy OD01	Welcomes the recognition of the need to include mitigation measures to safeguard and improve opportunities for biodiversity. Also recommends the inclusion of a requirement for high quality, sustainable design with an emphasis on climate change adaptation and mitigation.	Support is welcomed.
English Heritage	CSPO426	Core Policy OD01	The potential impacts on the historic environment must be thoroughly considered and suitable measures to safeguard and enhance the historic environment embedded in the policy provisions.	Noted and agreed This is an essential aspect in retaining and enhancing local distinctiveness.
West Mercia Constabulary Police	CSPO331	Core Policy OD01	Suggests re-worrding to Policy OD01 as follows:	Noted. The proposed wording will be further considered when developing the

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
HQ			<p><i>"The District's large scale office development requirements for the period 2006-26 will be accommodated within or on the edge of Kidderminster Town Centre supported by essential infrastructure and public services. "</i></p> <p>Considers that this reflects advice set out in the emerging PPS 4.</p>	Core Strategy Submission DPD.
Kidderminster Civic Society	CSPO488	Core Policy OD01	The 40,000 sq.m (8.47) office development figure is probably optimistic and we do not want to end up with empty office buildings in the Town Centre.	The concern over the levels of office development is noted. This is specified within the emerging RSS.
Morbaine Ltd	CSPO231	Core Policy OD01	<p>Support general aim to locate larger scale office development requirements within or on the edge of Kidderminster town centre. However, where such requirements cannot be met other suitable sites would need to be identified. Small scale office requirements should also be provided for. Whilst Morbaine is broadly supportive of Kidderminster as a strategic centre, being the focus for large scale office development it is our view that Kidderminster will not have the capacity to accommodate the challenging West Midlands RSS target of 40,000 sqm (gross) of office floorspace for the plan period.</p>	<p>The comments submitted by Morbaine are useful and the concerns over the availability of suitable sites to meet the RSS target for office floorspace within and to the edge of Kidderminster town centre are noted.</p> <p>The Kidderminster Central Area Action Plan and Site Allocations & Policies DPDs will look at specific sites and are currently at their Issues and Options stages. This will be informed by a number of Evidence Base Studies such as the Employment Land Review and the Retail and Commercial Leisure Update.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>With reference to the thirteen allocated 'Town Centre use' (TC.2) sites located within Kidderminster's current adopted town centre boundary, it is clear that the WMRSS office space requirements far exceed the capacity of these sites to accommodate office floorspace. Furthermore, it appears unlikely the TC.2 sites are suitable, available and viable for significant office space redevelopment. Many of the sites are in active use, under numerous ownerships, require active frontages and have poor site access arrangements.</p> <p>With particular reference to stage 2 of the Employment Land Review, our analysis of the type of land and stock sites available within the Kidderminster central area suggests much of the employment land/sites available is inappropriate for office development (Class B1a).</p> <p>There are 18 currently available employment land sites in Kidderminster, totalling 39.32ha as outlined in Table 1 at Appendix A. there is a further supply of 28 employment stock sites within Kidderminster and the surrounding area,</p>	

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>as outlined in Table 2 at Appendix A. The vast majority of these sites are located predominantly far from Kidderminster Town Centre, within a setting characterised by industrial and/or manufacturing uses (B2 and B8) as indicated in the tables at Appendix A. Many of these sites have reasonably good access to the surrounding road network, but are beyond a reasonable walking distance and divorced from the town centre's supporting facilities, and surrounded by a low quality environment.</p> <p>A significant proportion of the currently available employment sites in Kidderminster are made up of relatively large, former factory sites; for example the former British Sugar site. These sites require significant investment from a variety of stakeholders to redevelop and are unsuitable for smaller scale, locally based office investment. Whilst potential B2 and B8 land uses appear to be well catered for, such site characteristics present significant barriers to their development for any uses other than those within the B2 and B8 use class. This would in part explain why it is likely many of these sites have been available to</p>	

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>lease/purchase for considerable time and where interest is shown, it is unlikely to be for utilising the site as a B1a office destination.</p> <p>As such, further consideration should be given to suitable, available and deliverable sites within the edge of the Kidderminster central area for their potential to accommodate purpose built, high quality dedicated office space. In accordance with prevailing government guidance, such sites will need to demonstrate they are located in accessible, sustainable locations with good linkages to the Kidderminster central area.</p>	
Kidderminster Property Investments	CSPO292	Core Policy OD01	Whilst office development should be accommodated in and around Kidderminster it is contended that Churchfields North should be safeguarded for residential development.	Noted. The Churchfields North site is being considered through the Strategic Housing Land Availability Assessment. The Kidderminster Central Area Action Plan will be responsible for designating the site for a particular use.
Bewdley Town Council	CSPO542	Spatial Strategy – Retail para 8.44	The big out of town retail areas have almost certainly reached saturation point and supermarkets are becoming unpopular with a desire for more local produce to be used. Therefore careful consideration needs to be given to all the retail areas in the Wyre Forest District.	<p>Noted. A Retail Update Study is being commissioned by the District Council which will look into shopping trends for the District into the future.</p> <p>Local produce will form an important element in the District's future economy and will also help to stimulate sustainable</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
				tourism opportunities.
West Midlands Regional Assembly	CSPO395	Core Policy RD01	Core Policy RD01 is in line with emerging WMRSS Policy PA12A.	Support is welcomed.
Natural England	CSPO455	Core Policy RD01	Welcomes the recognition of the need to include mitigation measures to safeguard and improve opportunities for biodiversity. Also recommends the inclusion of a requirement for high quality, sustainable design with an emphasis on climate change adaptation and mitigation.	Support is welcomed.
English Heritage	CSPO425	Core Policy RD01	Potential impacts on the historic environment must be thoroughly considered and suitable measures to safeguard and enhance the historic environment embedded in the policy provisions.	Noted and agreed. This is essential in retaining and enhancing Kidderminster's local distinctiveness.
Highways Agency	CSPO350	Core Policy RD01	The continued development of Kidderminster as the employment and retail centre for the district should be supported by the development of sustainable transport links to the rural areas and other key settlements and the improvement of rail services and facilities within the town.	Noted and agreed. These comments will help to inform the Implementation Plan to be undertaken as part of the LDF.
West Mercia Constabulary Police HQ	CSPO330	Core Policy RD01	Suggests rewording of Policy RD01 as follows: <i>The District's comparison retailing requirements for the period 2006-26 will be accommodated within Kidderminster Town</i>	Noted. The policy wording will be further considered when developing the Core Strategy Submission DPD.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p><i>Centre. Retailing requirements include the need to accommodate 25,000 sq.m (gross) for the period 2006-21. All new comparison retailing proposals should contribute to providing a high-quality and safe environment within Kidderminster Town Centre...'</i></p> <p>Considers that this accords with advice set out in PPS 6 - Planning for Town Centres.</p>	
Kidderminster Civic Society	CSPO487	Core Policy RD01	Support for Core Policies RD01 and OD01 - need to keep Kidderminster Town Centre as a vibrant busy town. Considers that the 25,000sq.m for retail appears to be wildly optimistic given the current economic climate.	Support is noted
Campaign to Preserve Rural England	CSPO312	Core Policy RD01	<p>Accepted that Policy RD01 conforms to the requirements of the WMRSS. Concerned that new retail space may be in substitution for existing space. Developers build new shopping precincts (whether in town centres or out-of town) that have the effect of relocating the core and leaving what was prime retail space as secondary, or as declining into shop-front financial services outlets. It is important that plan led growth should not stifle existing enterprises.</p> <p>WMRSS policy PA12A (Phase 2 Revision -</p>	The concerns over the levels of retail space required for the future are noted. The KCAAP and Site Allocations and Policies DPD will look to allocate appropriate sites for retail based on work undertaken on the evidence base including the Retail and Commercial Leisure Update Study.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Preferred Option) provides for significant retail growth for "Kidderminster", which clearly refers to its town centre. It does not provide for growth elsewhere. Stourport and Bewdley (as market towns) are non-strategic centres. However, they are unusual examples of market towns, due to their closeness to Kidderminster (which overshadows them) and their origin as river ports.	
Tesco Stores Ltd	CSPO248	Core Policy RD01	<p>Recommends that the balance between centres should be reconsidered. It would be appropriate for the strategy to recognise that the promotion of additional retail development, including both convenience and comparison floorspace, at Stourport would be a desirable objective, consistent with the advice of PPS6.</p> <p>Paragraph 8.45 states that no alternative scenarios have been tested in relation to the location of future retail growth because the focus on Kidderminster has been specified by the RSS. The RSS does, however, allow for review where appropriate, which we consider would be advisable in this case in order to allow for reinforcement of the role of Stourport.</p>	<p>These concerns are noted. However, the Core Strategy must be in general conformity with the Regional Spatial Strategy which advocates Kidderminster as a strategic centre in providing the focus for leisure, retail, business and commercial development within the District.</p> <p>The Council commissioned a Retail and Leisure Study Report which provided forecasts for potential floorspace requirements for Stourport-on-Severn. These forecasts are outlined at pages 22 and 23 of the Site Allocations and Policies Issues and Options Consultation paper.</p>
Shaylor	CSPO114	Core Policy	The aim of Policy RD01 is supported to	Noted and agreed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Construction Ltd		RD01	focus further retail and leisure development within Kidderminster Town Centre. This will also help to improve Kidderminster's attraction as a visitor destination, which should be supported with heritage based tourist attractions and further provision for hotel accommodation.	
Chester Properties	CSPO237	Core Policy RD01	<p>Agree that identified retail capacity should generally be accommodated within Kidderminster town centre. However, where there are no suitable town centre sites available existing retail destinations adjacent to the town centre should be considered.</p> <p>Crossley Retail Park is located on the edge of Kidderminster town centre, across the road from Weavers Wharf which is considered to be town centre in terms of PPS 6. It is located across the road from the 'town centre' and is very similar in character to the Weavers Wharf scheme. Both retail schemes comprise predominantly retail warehouse type units with large car parking areas to the front.</p>	Noted. Policy RD01 reflects and is in general conformity with the emerging West Midlands Regional Spatial Strategy. This looks to accommodate future retailing requirements within Kidderminster town centre. The Submission Core Strategy DPD will be informed by the Retail Update Study, which is currently being commissioned by the District Council.
Chester Properties	CSPO238	Core Policy RD01	General comments on behalf of Chester Properties, the owner of Crossley Retail Park. Considers that the Retail Park is an existing retail location, which greatly contributes to retailing in Kidderminster	The comments submitted on behalf of Chester Properties relating to the role of Crossley Park are noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>and the wider district. It is also the only retail park in Kidderminster and it is important that this is recognised in emerging policy.</p> <p>Consider it to be important that Crossley Retail Park's contribution to the district be recognised in the Council's emerging policy documents.</p>	

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Government Office for the West Midlands	CSPO199	Key Diagram	The key diagram on page 25 provides a useful overview of the issues facing the district; however this could be improved by further use of annotations to provide a clearer picture of broad locations of proposed developments could go in relation to wider areas.	Noted. Consider this in the development of the Submission Core Strategy.
Marston's PLC c/o First City Ltd	CSPO130	Key Diagram	Consider that the notation on the key diagram is unclear and could lead to confusion in relation to settlements and rural villages within the settlement hierarchy. The settlement hierarchy identifies Fairfield, Cookley, Blakedown and Chaddesley Corbett as villages and therefore, only these settlements should appear on the key diagram. Wolverley and Wilden should not be included.	Noted and agree. Amend key diagram accordingly.
Mr Bob Eaton	CSPO8	Key Diagram	<p>Raises particular questions relating to the Rural Regeneration Zone:</p> <p>1) What is a RRZ? 2) What impact will it have on the Green Belt and the Wyre Forest? 3) What is its timescale?</p>	<p>Individual response sent to specific questions.</p> <p>Consider including further detail on the RRZ in the document.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
English Heritage	CSPO427	Core Policy Development	As part of the Strategy we advise that it sets out the broad strategic framework for the effective future management of the historic environment. This provides the necessary link between the Spatial Portrait, Vision and Objectives to a core policy.	Noted. This will be considered further when developing the Core Strategy Submission Document.
The Coal Authority	CSPO59	Core Policy Development	<p>Sets out detail on the background to the Coal Authority.</p> <p>Keen to ensure that coal resources are not unduly sterilised by new development. Prior extraction of coal also has the benefit of removing any potential land instability problems in the process. If a development is to intersect the ground then specific written permission of the Coal Authority may be required.</p>	Noted. This information is useful in developing the Implementation Plan to inform the Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Worcestershire County Council	CSPO216	11. Delivering Housing Choice	<p>Considers that paragraphs 11.1 & 11.2 repeat government policy.</p> <p>Concerned that none of the policies mention phasing or the need to utilise brownfield sites first. This could at least be cross referenced to Policy DS01.</p> <p>Welcome clarification of why the SHMA concluded net affordable housing need at 175 dwellings per annum and that Policy 1a only looks to ensure an annual average of at least 60 units of affordable housing. It would be useful to know the basis of and the reasons behind the difference in the figures and for this to be set out in the plan.</p>	<p>Noted. These are useful comments.</p> <p>The Core Strategy will incorporate a general policy on phasing, however this needs to be informed by the SHLAA which is currently being undertaken. This will be completed in time to inform the Submission Core Strategy Document. The information was not available at the time the Preferred Options Paper was prepared for consultation.</p> <p>The concern over the discrepancies in figures for affordable housing provision is noted. The figure reflected in the policy is influenced by the LSP target and further work is required to clarify this, which has yet to be finalised by the LSP.</p>
Bewdley Town Council	CSPO499	11. Delivering Housing Choice Para 11.7	Affordable housing should meet the same building quality standards as required for Community Housing.	Noted and agreed.
Worcestershire Greenpeace	CSPO67	11. Delivering Housing Choice Para 11.7	Support for the approach suggested.	Support is welcomed.
West Midlands Region RSL Planning Consortium	CSPO42	11. Delivering Housing Choice Para 11.7	Option appraisal fails to set out how options were rejected. Expect the Council's position on this to be fully justified in the submission document as there are no obvious reasons for rejection.	Option appraisal is based on Sustainability Appraisal. A Draft Sustainability Appraisal Report was published for consultation alongside the Core Strategy Preferred Options Paper.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
				<p>The selected option must also be in general conformity with the emerging RSS. The Submission Core Strategy document will be informed by and reflect recommendations set out in the RSS Phase 2 Revision Panel Report which is expected to be made available in September 2009.</p> <p>The SHLAA will help to inform the draft policy wording set out in the Submission Core Strategy document. This is currently being finalised and will provide evidence in relation to those housing sites which are available during the plan period.</p>
Wyre Forest District Council	CSPO338	11. Delivering Housing Choice Para 11.3	The SHMA proposed "as high a proportion as possible of market housing to be low cost."	Noted. This will be further specified in the Submission Core Strategy Document.
Wyre Forest District Council	CSPO339	11. Delivering Housing Choice Para 11.7	Agree with the options.	Noted. These options were consulted on at the Issues and Options Consultation Stage. The Core Policy Preferred Approach reflects a combination of these options.
Wyre Forest District Council	CSPO354	11. Delivering Housing Choice	More integration of low carbon/energy efficiency aspirations.	Noted. This is set out in Core Policy area 15 - Delivering Sustainable Development Standards.
Shaylor Construction Ltd	CSPO115	11. Delivering Housing Choice Para 11.3	The references to the provision of affordable housing should take into account the need to provide various forms	Noted. Core Policy 1b sets out the preferred approach for delivering mixed communities which also considers the

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			of accommodation as affordable, such as Extra Care Dwellings which in turn help to free up existing housing stock by relocating elderly residents to more suitable accommodation. In consideration of this and the overall need for affordable or low cost housing within the District, as well as the ageing of the resident population, the benefits of providing further Extra Care accommodation should be recognised and not constrained by the existence of such accommodation already in a location.	provision of housing and specialist accommodation to meet the needs of older people and other vulnerable groups, including continuing and extra care facilities.
Government Office for the West Midlands - Planning Team	CSPO204	Core Policy 1a	It is noted that you have lowered the threshold which was previously below 15 dwellings to below 10 dwellings, and that you have increased the affordable homes percentage to 40%. It is good to see that the SHMAA has been used as evidence to support the need for additional 2 and 4 bedded homes.	Support is welcomed.
West Midlands Regional Assembly	CSPO397	Core Policy 1a	Core Policy 1a is generally in line with emerging WMRSS Policy CF7.	Support is welcomed.
Natural England	CSPO457	Core Policy 1a	Recommend the incorporation of energy efficiency standards in line with those set out nationally in the Code for Sustainable Homes and a reinstatement of the requirement for renewable energy provision within the policy on affordable	Noted. Core Policy area 15 Delivering Sustainable Development Standards covers energy efficiency in more detail. It is considered that the reinstatement of these requirements under the housing choice policy would be a useful addition,

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			housing. These measures will reduce living costs for those in the homes and the potential for these occupants to be in fuel poverty.	particularly in relation to affordable homes.
Worcestershire County Council	CSPO217	Core Policy 1a	<p>Suggests combining paragraphs 7 and 8 in Core Policy 1a. Suggests the following amendment:</p> <p><i>"In conjunction with the Parish Councils, to identify appropriate sites within the Site Allocations and Policies DPD for the sole provision of affordable housing in accordance with the Council's adopted definition. In exceptional circumstances permit small scale affordable housing schemes to meet local needs, within or adjacent to the settlement boundary. Applicants would be required to demonstrate clear evidence of a need for housing in the Parish."</i></p>	These comments are noted and will be further considered in the Submission Core Strategy Document.
Kidderminster Civic Society	CSPO489	core policy 1a	40% on sites of 10 or more is almost certainly to be uneconomical and this policy is likely to stifle the policy DS01 or create either very large sites (if available) where economies of scale may deliver OR small sites so the policy does not apply. It is noted that the policy is subject to an economic viability appraisal but frankly I think you may as well save the money and reconsider now. Local knowledge indicates	Noted. As specified in the Preferred Direction for the policy. Further work on viability assessments will be undertaken by independent consultants commissioned by the District Council. This work will be undertaken independently and the policy development must take account of it as a key element in the LDF Evidence Base.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			that in practice this policy will cause problems.	
West Midlands Region RSL Planning Consortium	CSPO41	Core Policy 1a	<p>Support the adoption of the PPS3 Definition for housing.</p> <p>Welcome the use of low affordable housing provision thresholds, but object to the approach as set out in Core Policy 1a. Fail to see how viability has been tested and considers this policy to be incomplete.</p> <p>Note that the off-site contribution required from housing developments falling below thresholds may be overly restrictive. Should be set alongside recognition that viability may be a significant issue. Should be additional to Planning Obligations SPD.</p> <p>Support proposed adoption of a rural exceptions policy. Request clarification on the meaning "of applicants" (page 29) in reference to small scale housing scheme</p>	<p>Support is welcomed.</p> <p>Viability assessments will be carried out during the preparation of the Submission Core Strategy.</p> <p>The meaning of the word "applicants" in relation to rural exceptions will be clarified within the Submission Core Strategy.</p>
The Inland Waterways Association	CSPO158	Core Policy 1a	Affordable housing has to be located where there is a good level of public transport services. Former farmhouses, because of their general remoteness might not be the most suitable buildings for affordable housing.	Noted and agreed.
Campaign to Preserve Rural	CSPO313	Core Policy 1a	Considers the threshold of 10 dwellings in Core Policy 1a to be too high. There is no	The concerns over thresholds are noted. However Kidderminster is identified as a

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
England			<p>need for a higher threshold than three dwellings. In any event, contributions in lieu of actual provision should be required down to a very low threshold.</p> <p>The district suffered from the highest level (4.7% in 2007) of unoccupied homes in the region, except three metropolitan councils. It is important that this be addressed (as the plan indicates) to avoid the need for more houses to be built where this is not necessary.</p>	<p>Local Regeneration Area and thresholds for the delivery of affordable housing need to be realistic to ensure that development is not stifled. The Draft Policy specifies that off site contributions towards affordable housing would be required for smaller housing developments and this could be further clarified within the Submission Core Strategy Document.</p> <p>The concerns relating to unoccupied dwellings are very important and this is reflected in the wording of the Draft Core Policy.</p>
Campaign to Preserve Rural England	CSPO314	Core Policy 1a	Support for the Council's Empty Property Strategy.	Support is welcomed.
Revelan Group	CSPO242	Core Policy 1a	Considers Core Policy 1a to be excessively rigorous. The provision of affordable housing should only be sought on general market housing sites when development economics allow it. Request that the draft policy is amended to include the caveat " <i>subject to the economic viability of the site concerned.</i> "	<p>Noted. The Policy accords with both national and regional planning policy and is based on the affordable housing need established through the SHMAA.</p> <p>A caveat is included within the Draft Policy which states: "<i>This policy is subject to an economic viability appraisal to be commissioned by the District Council prior to the submission of the Core Strategy.</i>"</p>
Kidderminster	CSPO293	Core Policy 1a	Contends that fixing the policy at 40%	Noted. Would draw the respondent's

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Property Investments			<p>provision on all sites in Kidderminster may hinder deliverability. The policy provides no reference to site-by-site analysis and does not relate affordable housing provision to the viability of each site.</p> <p>Suggests the following rewording of the policy:</p> <p><i>"Generally, to secure affordable housing provision of 40% on sites of ten or more dwellings with Kidderminster and Stourport on Severn; and 40% on sites of 5 or more dwellings in Bewdley and the rural areas."</i></p>	<p>attention to the caveat at the end of Core Policy 1a which states:</p> <p><i>"This policy is subject to an economic viability appraisal to be commissioned by the District Council prior to submission of the Core Strategy"</i></p>
Shaylor Construction Ltd	CSPO116	Core Policy 1a	Support for the recognition in Core Policy 1a that viability is an important factor in relation to affordable housing provision. Some dispensation should be afforded when S106 financial contributions are calculated.	Noted. Viability assessments are to be commissioned as part of the evidence base to inform the LDF.
British Sugar Plc	CSPO368	Core Policy 1a	<p>Suggests an additional caveat to Core Policy 1a, whereby an economic viability appraisal relating to a specific proposal could justify variance of the level of affordable housing provision.</p> <p>Given the importance of housing provision in the Government agenda we feel that more flexibility should be included in a prescriptive policy of this nature. There is a</p>	Noted. It is considered that the Preferred Direction to Core Policy 1a clearly indicates the Council's approach to viability assessments. The requirement for the provision of affordable housing accords with national, regional and local policy in the form of the Local Area Agreement.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>danger that a policy like this would significantly inhibit positive development opportunities.</p> <p>Considers that there is the opportunity to provide a suitable level of affordable housing along with other social infrastructure contributions at a site put forward for Wilden Lane.</p>	
Country Land & Business Association	CSPO382	Core Policy 1a	<p>A preferable approach would be to facilitate relatively small scale and well designed developments through planning guidance and local decision making. Village envelopes, should be loosened allowing conversion of redundant farm buildings into residential use, as well as for commercial purposes; and to extends these same principles to the green belt, national parks and AONBs. In those designated areas planning authorities should be discouraging major developments, not those meeting local need.</p> <p>However, village appraisals often show that communities would be content to see smaller, well designed housing developments which enable the village to sustain its population, shop, pub and/or school. True sustainability in the</p>	<p>These comments are useful, however they must be considered in the context of National and Regional Planning Policy, which the Core Strategy must be in general conformity with.</p> <p>The LDF will contain policies relating to rural exceptions schemes for affordable housing developments.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			countryside must rest on economic and social pillars as well as conservation of the environment.	
A R Price	CSPO376	Core Policy 1a	<p>Objection is raised about the failure of Core Policy 1a to include reference to 'economic viability' as a key component of the ability of any site to make suitable provision.</p> <p>As an essential minimum, core policy 1a should recognise that the provision of the affordable housing deriving from any development site, will be dependent upon economic viability, and that this should be a key determinant, along with defined need, in the actual amount of provision made.</p>	<p>Noted. Would draw the respondent's attention to the caveat set out at the end of the Preferred Direction for the provision of affordable housing which reads as follows:</p> <p>"This policy is subject to an economic viability appraisal to be commissioned by the District Council prior to submission of the Core Strategy."</p>
Upper Arley Parish Council	CSPO266	11. Delivering Housing Choice Para 11.15	Paragraph 11.15 - we believe that it is the planning process itself which provides the safeguard and it should not be a blanket prevention that governs the issue.	These comments are noted.
Worcestershire Greenpeace	CSPO68	11. Delivering Housing Choice Para 11.15	Paragraph 11.15 - lifetime homes. Does the 2nd bullet point imply that 100% is established as the % for the bullet above?	It should be noted that these are options which were previously consulted on. The Preferred Approach for Delivering Mixed Communities sets out the Core Policy direction. This specifies that all housing sites of 5 or more dwellings will be required to comply with lifetime homes standards.
Wyre Forest District	CSPO340	11. Delivering	Paragraph 11.12 suggests continuing the	Noted and agreed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Council		Housing Choice Para 11.12	final sentence with "more single households forming early and increasing life expectancy".	
Wyre Forest District Council	CSPO341	11. Delivering Housing Choice Para 11.13	Worcestershire Supporting People Strategy assists with identifying housing options.	Noted and agreed.
Wyre Forest District Council	CSPO342	11. Delivering Housing Choice Para 11.15	Considers there is no rationale to promote care villages specifically.	Noted. The Worcestershire Older People's Housing Needs Strategy will help to inform whether there is a need to allocate sites specifically for care villages within the District.
Shaylor Construction Ltd	CSPO117	11. Delivering Housing Choice Para 11.13	The growing need for accommodation specifically for the elderly should be appropriately recognised through the promotion of sustainable locations for Extra Care Accommodation. Proposals for such accommodation should not be resisted on the grounds that Extra Care Accommodation already exists in the area.	The provision of extra care facilities within the District will be informed by the Worcestershire Older People's Housing Needs Survey which is due to be published shortly. Appropriate sites would be allocated within the Site Allocations and Policies DPD and should be in sustainable locations which help to reduce the need to travel.
Shaylor Construction Ltd	CSPO118	11. Delivering Housing Choice Para 11.15	The option to allocate sustainable sites within the towns for specialist accommodation for the elderly, in the form of mixed-use care schemes is supported. The Brinton's Offices site on Exchange Street, Kidderminster is considered to be suitable for such a mixed-use development and should be promoted for such through the LDF documents.	Noted. This will be further considered through the Site Allocations & Policies DPD and will be informed by the Worcestershire Older People's Housing Needs Survey.
Government Office	CSPO201	Core Policy 1b	Welcomes the approach to the role of	Support is welcomed and the advice is

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
for the West Midlands - Planning Team			design in delivering mixed communities. Recommends ongoing consultation with CABI and prudent use of design guidance.	noted.
Government Office for the West Midlands - Planning Team	CSPO205	Core Policy 1b	Support for Core Policy 1b. Pleased to see that a survey on Older and Vulnerable Residents' Housing Needs will inform the Submission Core Strategy Document and that housing sites over 5 dwellings will be required to comply with lifetime homes standards.	Support is welcomed.
West Midlands Regional Assembly	CSPO399	Core Policy 1b	Core Policy 1b reflects WMRSS Policies CF6 and CF8.	Support is welcomed.
Natural England	CSPO458	Core Policy 1b	Support for Core Policy 1b. Advocate the further consideration of this within the Site Allocations & Policies DPD and through a Green Infrastructure Study.	Noted and agreed.
English Heritage	CSPO428	Core Policy 1b	Agree with the importance of density and design of new development being informed by a thorough understanding of its context including the historic character of the area. Residential character classifications should be informed by the historic environment.	Noted and agreed. This will be subject to further discussions with English Heritage.
Worcestershire County Council	CSPO218	Core Policy 1b	All public sector funded housing in England will be built to Lifetime Homes Standard from 2011 with a target of 2013 for all private sector dwellings. The policy contains no density policy for Bewdley or surrounding rural areas, we	The comments relating to density for Bewdley and the rural areas are noted. Density policies are prescribed in national policy (PPS 3). Furthermore developments in these areas should take into account the existing residential character.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>suggest that this is rectified.</p> <p>Why is foot note 4, page 32 not included within the policy wording?</p>	The County Council is reminded that this is not a draft policy and there is scope to change wording and clarify within the Submission Core Strategy Document.
West Mercia Constabulary Police HQ	CSPO332	Core Policy 1b	Support for Core Policy 1b, however would like the supporting text of this Policy expanded to define what services actually means. This should include a reference to emergency services. This would make it much more likely that the overall vision of "Delivering Mixed Communities" in a sustainable way would be achieved across the District.	Noted and agreed.
The Coal Authority	CSPO546	Core Policy 1b	<p>Seeks change to Core Policy 1B - Delivering Mixed Communities</p> <p>Introduction of an objective or flexible policy approach which would allow the opportunity for the prior extraction of shallow coal resources where sterilisation may occur by built development, particularly where this coincides with areas identified for development and/or regeneration. This would also provide the additional public safety benefit of removing any potential land instability problems in the process.</p> <p>Reason - For consistency with national</p>	Noted. These are useful comments and it is considered that they could be further considered under sustainable development standards. However, this would need to be considered and balanced against Worcestershire County Council's Minerals Framework.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			planning policy for minerals and preventing the undue sterilisation together with ensuring public safety from potential land instability associated with shallow coal resource	
British Waterways	CSPO253	Core Policy 1b	Support for Core Policy 1b. which provides a positive framework within which to consider sites.	Support is welcomed.
Kidderminster Civic Society	CSPO490	Core Policy 1b	The considered view should therefore be to treat each one on its merits and if a property merits preservation then perhaps this should be dealt with in listing/local list section. Could not mention be made in this policy however that redevelopment involving demolition of larger/notable properties will be looked at carefully to see what alternatives are available so that wherever possible or wherever the property is particularly notable (reference to Listing and local list) then demolition should be avoided when a viable alternative exists.	Noted. This will be considered further when developing the Core Strategy Submission document.
West Midlands Region RSL Planning Consortium	CSPO43	Core Policy 1b	Core Policy 1b should set out the likely dwelling mix to be adopted by the Site Allocations and Policies DPD. Support the aim to provide housing for specialists needs groups and strongly support reference to CCRCs and extra care facilities. Should be informed by the	The Core Strategy, as an overarching document to guide future development, can only set out general policy in relation to dwelling mix. This will need to be established through the Site Allocations & Policies DPD following further work on the SHLAA and Viability Assessments. The Older Persons Needs Analysis

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Older Persons Needs Analysis.	should be published shortly and will help to inform the Submission Document.
Campaign to Preserve Rural England	CSPO315	Core Policy 1b	<p>The Core Strategy appears to contain no policy to address the issue of house size (as opposed to density), save in respect of affordable housing. This defect needs to be addressed. However, perhaps this is better developed in DPDs on house sizes and types needed in different areas.</p> <p>The present policy lays down no density at all for development outside town centres, but should do. This should be expressed as (perhaps) 30-40, or 40-50 in urban areas and 30 elsewhere.</p> <p>The provision of a threshold of 5 dwellings for lifetime home standards is illogical. Either a standard should apply to all or none.</p>	Noted, these are useful comments. The Preferred Options Paper is a step towards the Submission document which will set out detailed draft policies. The Preferred Approaches set out are based on the evidence base which has yet to be completed. The issues raised by the respondent will be further considered through the development of the Submission Strategy.
Worcestershire Wildlife Trust	CSPO99	Core Policy 1b	Strongly recommends that as well as mentioning the Lifetime Homes Standard that the policy also makes reference to the Code for Sustainable Homes.	Noted. This will be further considered in the Submission Core Strategy Document. Core Policy Area "Delivering Sustainable Development Standards" refers to the Code for Sustainable Homes.
Wyre Forest District Council	CSPO343	Core Policy 1b	Schemes for extra care provision will be subject to an assessment of need and the appropriate commissioning where appropriate by statutory Authorities.	Noted and agreed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Bovale Limited	CSPO22	Core Policy 1b	Support for Preferred Approach to Delivering Mixed Communities. Particularly the final paragraph.	Support is welcomed.
Revelan Group	CSPO243	Core Policy 1b	The proposed residential development densities sought are considered excessive and likely to inhibit the desired provision of a range of dwelling types and sizes. It is submitted that the minimum density required should be 30 dwellings per hectare in accordance with national planning policy guidance. The Policy could further state that higher densities will be sought in the areas specified.	Noted. PPS 3 Paragraph 47 states: "Local Planning Authorities may wish to set out a range of densities across the plan area rather than one broad density range although 30 dwellings per hectare net should be used as a national indicative minimum to guide policy development and decision making, <u>until local density policies are in place</u> " The proposed densities set out in Draft Core Policy 1b reflect the requirement in PPS 3 for the effective use of land and the re-use of land that has been previously developed. They also reflect the emerging RSS and the recognition of Kidderminster as a Local Regeneration Area.
Kidderminster Property Investments	CSPO294	Core Policy 1b	Support for Core Policy 1b.	Support is welcomed.
Shaylor Construction Ltd	CSPO119	Core Policy 1b	The option to allocate sustainable sites within the towns for specialist accommodation for the elderly, in the form of mixed-use Extra Care schemes is supported. The Brinton's Offices site on	Noted. This will be further considered through the Site Allocations process and will be informed by the Worcestershire Older People's Housing Needs Survey.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Exchange Street, Kidderminster is considered to be suitable for such a mixed-use development and should be promoted for such through the LDF documents. Where such developments are 100% Extra Care then the accommodation size and type should be led by the provider, either Registered Social Landlord or private developer.	
British Sugar Plc	CSPO375	Core Policy 1b	<p>Suggests caution with regard to setting minimum density requirements for developments. A development incorporating a mix of dwelling type, but with the emphasis on family housing and an appropriate level of open space provision is likely to be less than 40 dwellings per hectare and given the results of the open space audit, developments should be providing, where possible, on-site provision.</p> <p>Considers that the site put forward for Wilden Lane could achieve all the aims of this policy and more.</p>	The concerns relating to the prescribed densities are noted. The densities set out reflect advice set out in PPS 3 and advocate efficient use of previously developed land. They also focus on the overall development strategy for the District which is to accommodate the majority of new housing development on brownfield sites within the urban areas of Kidderminster and Stourport-on-Severn.
Country Land & Business Association	CSPO384	Core Policy 1b	Rural settlements must retain their vitality and viability by allowing the development of dwellings and employment. It is important that services remain and be maintained in rural areas, to cater for the potential increase in residents.	The Core Strategy must be in general conformity with both national and regional planning policy. It is not considered to be sustainable to promote housing development in rural settlements where there are limited services and

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>The CLA calls for the core strategy to permit villages and smaller settlements to grow incrementally (in line with articulated village appraisals/parish plans) with policies that loosen village envelopes and through the use of the rural exceptions site policy (PPS3).</p> <p>The core strategy housing policies must encourage new small-scale well designed rural housing development of all types (affordable/shared equity and open market) in all rural communities whether or not the settlements are able to provide shops, schools or public transport.</p> <p>The core strategy must consider the possibility of using cross-subsidy from limited open market housing to affordable housing on exception sites, in order to increase the levels of private financial support and increase the amount of affordable rural housing.</p>	<p>facilities. This would contribute to unsustainable patterns in travel. Furthermore this runs counter to national and regional policy and the Development Strategy set out in the Preferred Options Paper which advocates the majority of new housing development on brownfield sites within the urban areas, with limited development to meet local needs within the rural settlements.</p>
A R Price	CSPO379	Core Policy 1b	Support recognition that sites will need to take account of character and local distinctiveness issues when determining overall density. This is especially the case where appropriate allocations are made within the larger rural settlements,	Support is welcomed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			densities at the level promoted within the policy for Kidderminster and Stourport Town Centres may not be so appropriate.	
Government Office for the West Midlands	CSPO206	Core Policy 1c	Support for Core Policy 1c based on the findings of the GTAA.	Support is welcomed.
West Midlands Regional Assembly	CSPO400	Core Policy 1c	Core Policy 1c generally accords with emerging WMRSS Policy CF9.	Support is welcomed.
Environment Agency	CSPO520	Core Policy 1c	Criteria should include reference to flood risk as a constraint to potential site allocations. The SFRA should inform the location of potential gypsy sites and you may wish to include reference to avoiding areas at risk of flooding (Zones 2 and 3), noting that permanent sites are not appropriate in Zone 3a or 3b, with the exception test required in Zone 2. Temporary sites are not appropriate in zone 3b and require the exception test in Zone 3a. Sites should have appropriate services including mains drainage.	Noted. These are useful comments from the Environment Agency and will be used to help develop the Core Strategy Submission document in conjunction with the completed SFRA.
Natural England	CSPO459	Core Policy 1c	Sites for gypsies, travellers and travelling show people should not negatively impact on biodiversity or on the delivery of green infrastructure. A requirement for this should be integrated into requirement ix.	Noted. It is considered that this could usefully be added to criterion ix.
Worcestershire County Council	CSPO219	Core Policy 1c	Would like to see greater emphasis on the Council's role in facilitating private	Core Policy 1c reflects the findings of the GTAA and the need for 30 additional

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			planning applications for gypsy sites.	itches is set out within this study.
The Inland Waterways Association (Birmingham, Black Country & Worcestershire Branch)	CSPO159	Core Policy 1c	Considers that this policy should also relate to boaters who continuously cruise the canal and river network and that the same facilities should be provided. Stourport is a canal town and thus ideally located for the provision of such facilities.	Noted. However, the Government Circular does not include boaters within its definition.
Campaign to Preserve Rural England	CSPO316	Core Policy 1c	There should be no lower limit for owner-occupied sites for gypsies and other travellers. This should enable them to provide for their own housing needs.	Noted. Core Policy 1c is based on the findings of the GTAA for the South Housing Market Area.
Friends Families and Travellers	CSPO31	Core Policy 1c	<p>Considers that this blanket policy is arbitrary and is an example of unacceptable criteria. The policy as it stands attempts to set limits on sizes of sites (both minima and maxima).</p> <p>The proposed criteria relating to residential amenity is capable of being interpreted such that almost any potential site could be refused. In our view the word 'unduly' should be inserted before 'detrimental'.</p>	The concerns relating to Core Policy 1c are noted. This is not a draft policy as such and should be viewed as a step towards a Draft Policy. The comments received will help to finalise the draft policy wording. As such these comments will be carefully considered when developing the Submission Core Strategy Document.
Wyre Forest District Council	CSPO344	Core Policy 1c	Make reference to sustainable and good quality sites.	Noted and agreed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Environment Agency	CSPO521	12. A Diverse Local Economy	Note that there is no contaminated land policy here. Recommends a sentence stating that the redevelopment of these areas is subject to risk assessment to ensure that remediation is feasible and achievable within the plan period. An alternative location for this issue could be in Core Policy 4 as this could cover all types of new development.	Noted. These comments are useful and will be further considered when developing the Submission version of the Core Strategy Document.
Centro- WMPTA	CSPO104	12. A Diverse Local Economy Para 12.6	Centro supports the view that new employment development should be in areas where high accessibility levels by public transport are already available.	Support is welcome.
Wyre Forest District Council	CSPO345	12. A Diverse Local Economy Para 12.1	Need for housing required to meet the need of businesses and employees.	Noted.
Wyre Forest District Council	CSPO355	12. A Diverse Local Economy	Mention focus on development of the environmental technologies sector (as per regeneration plans, Worcs Economic Strategy).	Noted and agreed.
West Midlands Safari Park	CSPO182	12. A Diverse Local Economy	<p>We are concerned that the draft version of the Core Strategy could adversely restrict the future development of the WMSLP. As drafted, the Core Strategy could restrict certain forms of development outside of the Core Strategy.</p> <p>The WMSLP has developed a strategy for the long term development of the Park to ensure that it continues to remain as one</p>	Noted. The WMSLP's important role in the local economy is recognised. This will need to be carefully balanced against national and regional planning policy. The WMSLP is located within the Green Belt and the policy in relation to the site will need to be carefully considered through the Site Allocations and Policies DPD.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			of the District's key employment sites and a regional tourist attraction. Accordingly the WMSLP will need to continue to evolve over time by adding new attractions and replacing redundant buildings and rides. The WMSLP also has longer term aspirations to develop a hotel and conference facility.	
Country Land & Business Association	CSPO386	12. A Diverse Local Economy	<p>The core strategy must positively encourage viable and vibrant rural businesses capable of offering attractive career opportunities to the younger generation. This will include the need for positive policies to assist the diversification of the core agricultural and forestry businesses, including those farming businesses located within designated areas.</p> <p>Employment can not always be near locations with public transport especially in rural areas. These businesses should still be able to expand and develop even though without public transport, this has been recognised in the government draft PPS4.</p> <p>CLA would like to know how Wyre Forest determines which employment sites are genuine and have a viable economic</p>	Noted. The Employment Land Review (July 2008) was undertaken in three stages and is used to inform the Local Development Framework. It is to be kept under review. This is available on the Council's website.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			future.	
West Midlands Regional Assembly	CSPO401	Core Policy 2	Preferred Direction for Supporting a Diverse Local Economy is in line with emerging WMRSS Policies PA6 and PA6B.	Support is welcomed.
Advantage West Midlands	CSPO476	Core Policy 2	<p>The Agency welcomes the encouragement of small scale and starter units within the three towns, as well as the recognition of the need to retain existing employment sites and to plan positively for rural employment opportunities</p> <p>Where alternative proposals for employment sites come forward on sites that are no longer viable for their previous use, initiatives to encourage mixed use activities such as starter units and business hubs that allow the creation of local services and may help create more balanced and sustainable communities should be considered as well as using such sites to create opportunities for new housing development.</p>	These comments are noted.
Natural England	CSPO460	Core Policy 2	Support proactive approach to developing live work units. Recommends that the requirements for development to protect the greenbelt and the landscape character be expanded to encompass biodiversity, or amended to read 'the natural environment'.	Noted. This will be further considered when developing the Core Strategy Submission Document.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
English Heritage	CSPO429	Core Policy 2	Must be informed by an understanding of the historic character and interest of the farmstead and its landscape setting. The County Council is undertaking a county-wide survey of historic farmsteads. We recommend that this work forms part of the evidence base.	Noted and agreed.
Bewdley Town Council	CSPO543	Core Policy 2	Highlights the requirement for small business units within the three towns.	Noted. This is confirmed within the Core Policy area.
Kidderminster Civic Society	CSPO491	Core Policy 2	Support for Core Policy 2.	Support is welcomed.
Revelan Group	CSPO244	Core Policy 2	It is to be expected that the 2008 Employment Land Review will soon become outdated. For these reasons, it is requested that the policy be amended to safeguard land identified for retention in the latest available Employment Land Review, unless it can be demonstrated that the land concerned is no longer required for such purposes.	Noted. The ELR will be subject to review. This will be further considered through the development of the Submission Core Strategy Document.
West Midlands Safari Park	CSPO184	Core Policy 2	The tourism sector has the potential to provide additional job opportunities helping to diversify the District's economic base. It is imperative that a holistic approach to developing and supporting tourism and visitor attractions is considered alongside visitor accommodation and support serve is adopted within the Council's Development Plan.	It is agreed that tourism plays an important role within the District's economy. However, tourism growth must be sustainable and the impacts on the District need to be fully considered. Tourism attractions such as the safari park are large trip generators. The provision for hotel and conference facilities must be considered in relation to the balance of existing facilities and the

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			The government's latest guidance on tourism and leisure highlights the general benefits of tourism including extending the length of stay and also the importance of business tourism. The WMVES acknowledges that there is great potential for the growth of conference facilities in the region. It is envisaged that a new hotel would provide tourism accommodation not just for the WMSLP but for the SVR and District as a whole.	need to regenerate Kidderminster town centre. Proposals must also accord with regional planning policy.
West Midlands Safari Park	CSPO189	Core Policy 2	<p>We believe the Core Strategy's employment policy should be amended to acknowledge the guidance contained in draft PPS 4.</p> <p>Firstly the policy should confirm what forms an employment site and what constitutes an employment development. As set out in draft PPS4, economic developments can be considered land uses that are major employment generators (paragraph 13) including tourism schemes.</p> <p>Secondly, the policy recognises that different forms of businesses have different locational requirements. The policy should encourage the development of existing businesses regardless of their</p>	Noted. These comments will be further considered when the final version of PPS 4 is released.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>location provided that their expansion is environmentally acceptable.</p> <p>a further criterion should be added to Core Policy 2 that states:</p> <p>- Where the proposed development will support and the development of existing businesses and create additional jobs, provided that the development is environmentally acceptable.</p>	
Hovi Developments Ltd	CSPO52	Core Policy 2	The provision of rural employment opportunities to provide for rural workers or sites in strategic locations within rural locations are extremely important as they provide for a flexible and diverse economy. Employment within rural areas should be focused on the intensification and infill of existing major sites. The findings within the 2008 Employment Land Review are supported.	Support is welcomed.
Worcestershire Greenpeace	CSPO69	12. A Diverse Local Economy Para 12.15	Considers links for cycling, walking, bus and rail should be upgraded rather than providing a link road. This would mean jobs were prioritised for local people versus commuters from outside the area.	Noted.
West Midlands Regional Assembly	CSPO406	Core Policy 3	Preferred Direction for Delivering Strategic Infrastructure to Assist Regeneration is in line with published WMRSS Policy T1 part B ii).	Support is welcomed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Advantage West Midlands	CSPO474	Core Policy 3	The focus on progressing feasibility works into the proposed A451/Hoobrook Link road and possible use of Community Infrastructure Levy contributions to help fund the Stourport Relief Road could be both important in bringing forward regeneration in this area and over the Local Development Framework time period.	Noted.
Environment Agency	CSPO522	Core Policy 3	Strategic infrastructure should include delivery of foul and surface drainage; water treatment and supply infrastructure and flood management schemes. This policy should ideally refer to these, or be renamed Strategic Transport Infrastructure as currently it refers only to transport infrastructure. Reference should be made to the information and implications of Water Cycle Study produced by Royal Haskoning.	Noted. The Preferred Options Paper is not a Draft Core Strategy as such and as such Policy Areas will be reworked for the Submission version.
Natural England	CSPO461	Core Policy 3	Approve of the recognition in the supportive text of the need to improve sustainable transport options in conjunction with the employment development. However, this could be better emphasised within the policy itself. We approve of the support for improvements to Kidderminster Railway	Noted. These comments will be further considered when developing detailed policy wording. The Council would welcome further discussions with Natural England.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>Station and access for all modes of transport indicated in the policy direction, but recommend that the policy goes further than this and better embeds the considerations presented in paragraph 12.11, including the need for infrastructure investment to include walk, cycle and passenger transport and include promotion of <i>"pedestrian facilities, cycle priority measures, bus priority measures and enhanced bus stop infrastructure"</i>.</p> <p>We would welcome further involvement in the development of transport options as and when appropriate, particularly around the A449 Hoobrook link and its potential implications upon Wilden Marsh and Meadows SSSI.</p>	
English Heritage	CSPO430	Core Policy 3	<p>Our general preference with respect to major new highway infrastructure projects is as far as possible to make the best use of the existing highway network before investing in new infrastructure.</p> <p>A thorough appraisal of potential direct and indirect effects on the historic environment would be required in the case of the proposed Stourport Relief Road and any forthcoming proposal for the A449 Hoobrook Link Road.</p>	Noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Worcestershire County Council	CSPO220	Core Policy 3	Considers this a misleading policy title as only transport infrastructure is covered. Should also cover other forms of strategic infrastructure.	Noted and agreed. This will be further considered through the development of the Submission Core Strategy document.
Worcestershire County Council	CSPO501	Core Policy 3	<p>The former British Sugar Site is well placed for access to labour catchments and travel demand to and from the site likely to increase significantly, so will place greater pressure on the local transport network.</p> <p>To facilitate the regeneration of the Stourport Road Employment Corridor (SREC), and in particular the British Sugar Site, the possibility of a new link road (Hoobrook Link Road) between the A451 Stourport Road and the A442/A440 Worcester Road across the Stour Valley has been identified in the LTP2 and in the Core Strategy Preferred Options Paper. A pre-feasibility study undertaken on behalf of Worcestershire County Council assessed the deliverability of this road. This concluded that the link road would help to address congestion problems in Kidderminster and Stourport as well as on sections of the A451. It would also enable the provision of bus priority measures along the A451 thereby reducing bus journey times, increasing service reliability,</p>	These comments on the deliverability of proposals for an A451/A449 Hoo Brook Link Road are useful and will help to inform the Submission Core Strategy Document.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>improving the financial sustainability of passenger transport and enhancing the accessibility of the SREC. The scheme also has the potential to enhance pedestrian/cycle infrastructure as part of the design.</p> <p>Further, detailed feasibility work is required, which will indicate environmental impact, timescales and potential funding for the scheme's delivery. This feasibility work will also indicate the extent to which the new link road will release highway capacity in Kidderminster and in particular along the Inner Ring Road, to improve conditions for pedestrians, cyclists, passenger transport and other road users.</p>	
West Mercia Constabulary Police HQ	CSPO333	Core Policy 3	It is the contention of the WMC that policing should be included as part of any definition and/or list of suitable recipients of Section 106 monies and/or Community Infrastructure Levy (CIL).	Noted. This will be further considered in relation to national policy.
British Waterways	CSPO254	Core Policy 3	The focus along the Stourport Road employment corridor, the Stourport Road.A449 Hoobrook Link Road and a new link road as part of the regeneration proposal for Horsefair all fit within BW strategy helping to unlock sites adjoining the Canal within the District which accommodate low grade employment	Support is welcome.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>uses or are underutilised/vacant sites which despoil the waterways environment and prohibit public access to it.</p> <p>The regeneration of waterway corridors can produce many benefits which could include: the creation of a more attractive and secure environment in which existing communities can live, work and play; the attraction of new residents, businesses and visitors (both land based and water based) thereby generating income for the area; attracting new housing and new housing types; encouraging good design; and, assistance in attaining goals for more pedestrian friendly route ways.</p>	
Kidderminster Civic Society	CSPO492	Core Policy 3	General support for Core Policy 3.	Support is noted.
The Inland Waterways Association	CSPO160	Core Policy 3	The Stourport Relief Road should be aligned well away from the historic parts of the town.	The indicative line of the proposed Stourport Relief Road is safeguarded on the Adopted Local Plan Proposals Map and would not impact on the historic town centre.
Stourport Cricket Club	CSPO32	Core Policy 3	Concern over the threat of the Stourport Relief Road proposal to Stourport-on-Severn Cricket and Rugby Football Clubs.	These concerns are noted. Further clarification on the status of the proposed road scheme for the Stourport Relief

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			With the continuing uncertainty of the relief road WFDC and WCC are preventing the opportunity of the clubs being able to obtain funding grants for the rebuild project. If this status is not addressed urgently it could result in the probable demise of both SCC and SRFC.	Road is required from Worcestershire County Council. At present the indicative line of the relief road continues to be safeguarded and WCC has not rescinded the line order.
Wyre Forest Friends of the Earth	CSPO55	Core Policy 3	<p>Objects to the construction of the Stourport Relief Road. More resources should be allocated to improving traffic flow in Stourport.</p> <p>Construction of the Hoobrook Link road could cause serious damage to Wilden Marsh SSSI. Widening the bridge would improve traffic flows and enable bus priority measures.</p>	These comments are noted.
Campaign to Preserve Rural England	CSPO317	Core Policy 3	Support for Core Policy 3.	Support is welcomed.
Kidderminster Property Investments	CSPO295	Core Policy 3	It is considered that there is currently a lack of detailed information to justify provision of a new link road at Horsefair. As this juncture, it is felt that reference to a new link road in the core policy is premature. Specifically, detailed investigations in relation to necessity, viability and deliverability are required before an informed decision on provision of the new link road is possible.	Noted. The infrastructure requirements for developing the Churchfields area will need to be fully assessed through further viability work to be commissioned by the Council later this year.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			The need for the new link road would be best assessed when the site allocations DPD has progressed, thus a judgement could be made with the knowledge of the intended uses of regeneration sites in the locality.	
British Sugar Plc	CSPO377	Core Policy 3	Given the proposed focus for employment land provision being at Stourport Road, the Hoobrook Link Road would be a particularly important facet of the Town's infrastructure. This proposal would divert goods vehicles away from the Town Centre, improving highway safety and public amenity, but would also increase the attractiveness and marketability of the SRCE to potential investors.	Support is noted.
Country Land & Business Association	CSPO387	Core Policy 3	CLA feel there are likely to be consequences for the farming community who may be unable to afford the fees e.g. for new livestock buildings required for animal welfare reasons.	Noted. Infrastructure provision must accord with national policy guidance.
Mr Henk Buzink	CSPO1	Core Policy 3	Keen to ensure that should a Hoo Brook Link Road be provided safe cycle routes are provided to connect Birchen Coppice and Spennells. This should link to Cycle Route 54 which connects Kidderminster to Stourport. This could provide opportunities for sustainable commuting.	Should the Hoo Brook Link Road be progressed, careful consideration will be given to maximising opportunities to promote cycling, walking and public transport along the route.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Environment Agency	CSPO523	13. Local Distinctiveness & Regeneration Para 13.8	Support for paragraph 13.8	Support is welcomed.
Worcestershire County Council	CSPO221	13. Local Distinctiveness & Regeneration	<p>Comments in relation to paragraph 13.2 relating to the rural hinterland.</p> <p>Considers the separation of St Mary's Church from the town by the ring road to be a major problem in consolidating the historical character of the town.</p>	<p>The comments on paragraph 13.2 refer to issues which are covered within the Spatial Portrait.</p> <p>Urban Design consultants have been commissioned in relation to the Kidderminster Regeneration Prospectus to look at options for improving the links between St Mary's Church and the town centre.</p>
West Mercia Constabulary	CSPO58	13. Local Distinctiveness & Regeneration Paragraph 13.19	<p>Highlights a number of issues relating to community safety and the fear of crime. Creating a crime free environment is essential to the future of Wyre Forest.</p> <ul style="list-style-type: none"> - Ensure all new development complies with West Mercia Constabulary's Designing Out Crime Standards. Developers should be actively encouraged to apply for the Secured By Design award. - New car parks should comply with the "Park Mark" safer parking scheme - All design and access statements should detail the measures developers intend to 	<p>Noted. These are considered useful comments. The issues raised will be fully considered through the Revised Design Supplementary Planning Document. They are also particularly pertinent to the Kidderminster Central Area Action Plan.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>take to reduce the chances of crime.</p> <p>- Evidence that footpaths and cycleways in the District have been badly designed and sited and have consequently become targets for crime.</p> <p>- By providing an alternative to the subways it implies that the subways will still exist. If they are not used the danger is that they will fall into a greater state of disrepair and attract more crime. When other routes have been created consideration should be given to closing the appropriate subway.</p>	
The Inland Waterways Association	CSPO150	13. Local Distinctiveness & Regeneration	Continual building along the Staffs & Worcs canal will mean that the canal will cease to be attractive and thus will put off the very tourism that elsewhere in the plan the Council is trying to encourage. Canals are attractive to users because of their diversity of scenery and so a continual ribbon of housing development will remove that interest.	Noted. The right balance for development to enhance the District's waterways will be very important.
Commission for Architecture and the Built Environment	CSPO34	13. Local Distinctiveness & Regeneration	Raises some general points about including design policies within the Core Strategy. Design should be embedded as a priority from strategic frameworks to site specific scales. It should be treated as a cross cutting issue.	These comments are considered useful.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Includes a list of key questions to assess the Core Strategy against to ensure a design ethos is embedded in the strategy.	
Campaign to Preserve Rural England	CSPO318	13. Local Distinctiveness & Regeneration Para 13.5	Questions wording of paragraph 13.5. Kidderminster's economic problems are essentially the result of the decline of the carpet-weaving trade.	These comments are noted.
Shaylor Construction Ltd	CSPO120	13. Local Distinctiveness & Regeneration 13.4 - 10	The recognition of Kidderminster as a strategic centre with a historic context should support the regeneration of the redundant areas of the town through the growth of tourism related to the previous carpet industry. The improvements of the Town Centre environment and conversion of redundant buildings should be identified as key goals to attract investment into the Town and attract further tourism opportunities.	Noted. Improvements to the town centre environment will need to be informed by historic townscape classification.
West Midlands Regional Assembly	CSPO407	Core Policy 4	The above policy approach generally accords with the relevant published WMRSS policies on the Quality of the Environment; published WMRSS Policies UR2 and UR3 with respect to Kidderminster's regeneration; and relevant published and emerging WMRSS policies with respect to the market towns, notably published WMRSS Policy RR3.	Support is welcomed.
Environment Agency	CSPO524	Core Policy 4	Advocates the need for ground investigation requirements where potential	Noted and agreed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			contamination on brownfield sites for redevelopment.	
Natural England	CSPO463	Core Policy 4	Considers that Core Policy 4 could do more to reflect the role of green infrastructure and biodiversity. The regeneration, incorporation and promotion of waterways should be underpinned by the concept of green infrastructure.	Noted and agreed.
English Heritage	CSPO431	Core Policy 4	<p>We welcome the prominence given in the explanation of the preferred approach to the historic character and heritage of the District's main towns and market towns.</p> <p>Characterisation approaches, as for example explained in our policy statement on Historic Suburbs (www.helm.gov.uk) offer an approach for understanding the characteristic attributes of valued townscape areas and should be considered in informing the review of the proposed residential classifications</p>	Noted and agreed.
Worcestershire County Council	CSPO222	Core Policy 4	<p>Recommends a new bullet point under Core Policy 4 as follows: "New developments should be accessible by sustainable transport modes to reduce car dependency and use"</p> <p>The policy should acknowledge the need for new development to minimise the impact upon the historic environment and</p>	These suggestions in relation to Core Policy 4 are noted. They will be further considered when developing the Submission version of the Core Strategy. WCC is reminded that the Preferred Options Paper represents the preferred approach for the direction of future policy, rather than actual draft policy wording.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>also to positively seek opportunities to exploit the heritage interest of such assets</p> <p>Question whether the second set of bullet points and associated text under Core Policy 4 need to be in the policy wording?</p> <p>Where is the policy on Market Towns as mentioned in Core Policy 4?</p>	
West Mercia Constabulary Police HQ	CSPO334	Core Policy 4	<p>Support for Core Policy 4, but would caution that whilst the inclusion of design measures to reduce opportunities for crime will assist in delivering sustainable communities, designing out crime and disorder activity will certainly not remove all such activity.</p> <p>It is clear from this reference that provision of infrastructure satisfying the five tests outlined in Circular 05/05 associated with the delivery of the Police Service would be justified on the basis that safer/sustainable communities require delivery of policing infrastructure, in addition to incorporating secured by design measures.</p>	Noted. These comments are useful.
British Waterways	CSPO255	Core Policy 4	Support for Core Policy 4. Highlights the importance of integrating development with the public realm with respect to orientation and layout,	Support is welcomed.
Herefordshire &	CSPO136	Core Policy 4	An important factor in local distinctiveness	Noted and agreed. This will be further

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Worcestershire Earth Heritage Trust			in the District especially within the major settlements, are the numerous exposures of red sandstones. They can be found all over the urban areas, and should be considered in all major infrastructure developments for possible enhancement.	considered through the Green Infrastructure Study.
Kidderminster Civic Society	CSPO493	Core Policy 4	Can reference to replacing the subways with suitable alternatives be added to the section on breaking the physical barrier created by the Ring Road? Also improving the "Gateways" to the town could be mentioned even if the detail is left to elsewhere.	Noted and agreed. It is considered that these detailed references would be better included within the KCAAP.
The Inland Waterways Association	CSPO161	Core Policy 4	Concerns over option appraisal at paragraph 13.19.	These concerns are noted and it is important to note that the right balance of development to regenerate the waterways needs to be carefully considered.
Council for British Archaeology West Midlands	CSPO84	Core Policy 4	This policy area needs to refer to the historic environment, including reference to Historic Landscape Characterisation.	Noted and agreed.
Campaign to Preserve Rural England	CSPO319	Core Policy 4	We welcome the general thrust of this policy. However it covers a wide range of different subjects and needs to be structured as several separate policies. References to a proposed Design SPG should be amended to include design issues identified in Parish Plans and Village Design Statements.	These concerns are noted and will be further considered when developing the Submission Version of the Core Strategy.
Wyre Forest District	CSPO372	Core Policy 4	Ensure appropriate landscaping and	Noted and agreed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Council			planting.	
Kidderminster Property Investments	CSPO297	Core Policy 4	Support for Core Policy 4. Obviously any proposed enhancements will need to be viable and deliverable. Whilst there are no buildings at Churchfields North that are worthy of retention or conversion, new development could employ design approaches which provide reminders and characteristics of the site's industrial heritage.	Support is welcomed.
A R Price	CSPO381	Core Policy 4	Questions the need for Core Policy 4.	Disagree. The Spatial Portrait, Vision and Objectives are centred around retaining the District's local distinctiveness. It is essential to have local interpretation of planning policy to retain this.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Worcestershire County Council	CSPO223	14. Managing Travel & Transport Demand	<p>We are very pleased to see that public transport issues are given such a high profile.</p> <p>the KCAAP (paragraph 14.5) should progress improvements to public transport infrastructure in terms of bus priority measures, bus stops and the bus station, in order to promote the image of bus travel and reduce dependency on the private car; making the bus station a more attractive interchange will also improve the image of Kidderminster and attract more shoppers and visitors.</p>	Support is welcomed.
Worcestershire County Council	CSPO500	14. Managing Travel & Transport Demand	<p>The transport infrastructure and services in the Kidderminster, Stourport, Bewdley area will require significant enhancement to improve accessibility, particularly by non-car modes and to cater for growth in a sustainable way.</p> <p>Ongoing maintenance/subsidy costs must also be taken into account in assessing the sustainability of such new developments.</p>	Noted and agreed.
Bewdley Town Council	CSPO545	14. Managing Travel & Transport Demand para 14.3	There should be more integrated transport to connect Bewdley with Kidderminster railway station.	Noted and agreed. The proposals for improvements at Kidderminster Rail Station will help to address this.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Upper Arley Parish Council	CSPO265	14. Managing Travel & Transport Demand	We ask that the WFDC should actively support our campaign to make the bridge design more sympathetic to the village architecture at Arley.	Noted. This would need to be considered through local distinctiveness policies and within the context of the Conservation Area Character Appraisal.
The Inland Waterways Association	CSPO151	14. Managing Travel & Transport Demand	Objects to the omission of the potential of the waterways for sustainable transport during the Issues and Options consultation.	Noted. The options listed at paragraph 14.6 are those which have previously been consulted on. There is potential for the waterways to offer sustainable transport solutions, however, this would need to be deliverable within the plan period. The key stakeholders such as British Waterways and the Environment Agency have not commented on the potential of the waterways for sustainable transport.
Centro- WMPTA	CSPO98	14. Managing Travel & Transport Demand	<p>Although all three LDF consultation papers cover an area outside of the Centro boundary, they fall within the West Midlands 'journey to work' area. In all three documents, cross boundary issues should be given further consideration.</p> <p>In particular, Centro recognises that Kidderminster is a significant rail station within the West Midlands and supports its redevelopment through working closely with existing partners including Network Rail, Worcester County Council, Wyre Forest District Council and the Severn Valley Railway.</p>	These comments are useful and will be given further consideration in the development of the Submission version of the Core Strategy document.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			All three LDF documents should make reference to Centro's Draft ' <i>West Midlands Rail Vision: Network Development Strategy</i> ' proposals for connecting the Severn Valley Railway line to the national network. This proposal would allow through linkages to be made, by conventional services to Bewdley, using the Severn Valley Railway. Therefore, Centro is keen to protect the alignment of this route.	
Centro- WMPTA	CSPO103	14. Managing Travel & Transport Demand	Centro welcomes the reference to the Stourport strategic park and ride scheme at Hartlebury. This scheme is highlighted in Centro's Draft ' <i>West Midlands Rail Vision: Network Development Strategy</i> ' and should be protected, to help support future growth areas and regeneration in the region.	Noted. A Strategic Park and Ride facility at Hartlebury would need to be considered through the South Worcestershire Joint Core Strategy. The Options set out under paragraph 14.6 relate to the safeguarded line along the disused railway line, for cycle and sustainable transport proposals.
Mr Robin Pearson	CSPO6	14. Managing Travel & Transport Demand	Lost opportunity for an integrated transport hub on land at the former Cattle Market site, Comberton Hill, Kidderminster. Possibility of the Local Authorities running their own bus services rather than private operators.	These comments are noted and will be referred to Worcestershire County Council as the Passenger Transport Authority.
Mrs Bridget Golding	CSPO173	14. Managing Travel & Transport	Advocates the need for a safe pedestrian crossing facility for the elderly at Vale Road, Stourport on Severn.	Noted and agreed. Discussions with WCC as the local transport authority have been on going in relation to this.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		Demand		
Mr David Pearson	CSPO11	14. Managing Travel & Transport Demand.	Sets out a number of suggestions in relation to improving the availability of bus service information covering all operators for the Wyre Forest District.	These comments are noted and will be forwarded to WCC as the Passenger Transport Authority.
West Midlands Regional Assembly	CSPO408	Core Policy 5	Core Policy 5 - Preferred Approach to Managing Travel and Transport Demand and Promoting Sustainable Modes is in line with emerging WMRSS Policies SR2 and T7 and published WMRSS Policies T3, T4, T5, and T10.	Support is welcomed.
Natural England	CSPO462	Core Policy 5	<p>We suggest that if well designed and provided within a package of measures to reduce travel demand, as indicated, park and ride facilities could play a positive role in the delivery of sustainable transport alternatives. In particular, park and ride facilities may provide a realistic alternative mode of transport for tourists visiting the area.</p> <p>The delivery of walking and cycling links should be considered within the context of green infrastructure where appropriate.</p>	Noted. The provision of park and ride facilities must be carefully considered to ensure more traffic is not encouraged through Kidderminster to parking facilities. This must also be balanced with proposals for improvements at Kidderminster Rail Station.
English Heritage	CSPO432	Core Policy 5	Welcomes the prominence given to improving walking and cycling as part of the policy.	Support is welcomed.
Worcestershire County Council	CSPO224	Core Policy 5	Makes a number of suggestions in relation to the wording of Core Policy 5.	Noted. These comments will be considered further when developing the Submission Version of the Core

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
				Strategy.
Worcestershire County Council	CSPO502	Core Policy 5	The development and potential implementation of transport infrastructure schemes and strategies which reduce the reliance on car as the principle mode of transport to access Kidderminster Town Centre may provide the opportunity to provide a Park & Ride facility for the town, fully integrated with the new bus, rail and highways infrastructure. The feasibility of such a facility is, however, dependent upon a technical appraisal of its costs and benefits and the availability of the necessary funding.	Noted. However such a technical appraisal has yet to be undertaken and would be required to inform the inclusion of such a proposal within the Core Strategy DPD. It is noted that as the Highway Authority, WCC has yet to commission such an appraisal. This would also need to be carefully considered in light of proposals for extensive improvements at Kidderminster Rail Station.
Worcestershire County Council	CSPO503	Core Policy 5	Whilst the LTP3 will aim to link into other documents such as Local Development Frameworks, Community Strategy or the LAA, the outcomes of the consultation process will help determine any further projects to develop the transport network within Wyre Forest.	Noted. However the timescale for the production of LTP 3 is later than that for the submission of the Core Strategy.
Highways Agency	CSPO351	Core Policy 5	Welcomes reference to travel plans within Core Policy 5, however considered that the policy wording should be made stronger and in relation to transport assessments.	Noted. However it is not the purpose of Core Policies to repeat national planning policy.
Centro- WMPTA	CSPO100	Core Policy 5	Centro would welcome continued involvement in Wyre Forest District Local Development Framework in order to ensure that policies and proposals	Noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			promote sustainable transport within the West Midlands and the wider area.	
British Waterways	CSPO256	Core Policy 5	Support for Core Policy 5.	Support is welcomed.
Worcestershire Wildlife Trust	CSPO102	Core Policy 5	Support for Core Policy 5.	Support is welcomed.
The Inland Waterways Association	CSPO162	Core Policy 5	Welcome the Council's drive towards sustainable transport especially for the movement of freight.	Support is noted.
Wyre Forest District Council	CSPO359	Core Policy 3/5	Considers there is conflict between Core Policies 3 and 5 - road building programme does not fit in with sustainable modes of travel.	Noted. WCC has advocated a District Wide Multi Modal study to help inform the requirements for transport infrastructure.
Kidderminster Civic Society	CSPO494	Core Policy 5	Advocates the use of the waterways for the movement of freight and also the provision of a rail link at the British Sugar Site.	It is noted that these issues have been raised by a number of respondents.
British Sugar Plc	CSPO385	Core Policy 5	Support for Core Policy 5.	Support is welcomed.
Kidderminster Property Investments	CSPO298	Core Policy 5	Support for Core Policy 5.	Support is welcomed.
Country Land & Business Association	CSPO439	Core Policy 5	This policy needs to have a balance between reducing travel and allowing settlements without public transport to grow as some rural areas may have little or no access to public transport. In rural areas, recognising that accessibility - whether by public or private transport, walking and cycling - is a key consideration, local planning authorities	Noted. Core Policies must be in general conformity with the Regional Spatial Strategy. This will be further considered in developing the Submission version of the document.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>should:</p> <p>Support farm diversification schemes for business purposes that help to sustain agricultural enterprise and are consistent in their scale with their rural location and environmental impact;</p> <p>Recognise that a site may be an acceptable location for development even though it may not be readily accessible by public transport.</p> <p>Support sustainable rural tourism and leisure developments that benefit rural businesses, communities and visitors.</p> <p>Support small-scale economic development where it provides the most sustainable option in villages that are remote from, and have poor transport links with, local service centres". (Paragraph 32 draft PPS4 Planning for Sustainable Economic Development consultation)</p>	
Mrs G Atkin	CSPO12	Core Policy 5	It is important to consider public transport requirements early in the planning process in order to achieve sustainable development.	Noted and agreed.
A R Price	CSPO383	Core Policy 5	Objection is raised to the fact that the policy as drafted appears to go beyond the	Noted. The respondent is reminded that the policy wording is a direction for the

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>remit of Section 106 agreements as currently enshrined in legislation, in not making it clear that contributions will need to be demonstrably linked to the individual impacts arising, and mitigation necessary, from any individual development site.</p> <p>It is considered that the policy should in its main text be more explicit that until such time as CIL is addressed separately, that contributions and funding will need to be provided within the legal and strategic framework that currently exists,</p>	<p>preferred approach rather than draft. Further clarification can be added at submission stage.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Environment Agency	CSPO509	15. Delivering Sustainable Development Standards	Although waste is primarily dealt with by the County Council, some matters are still relevant. The WEEE Directive 2002/96/EC and 2003/108/EC is not mentioned - this sets out a responsibility for the provision of Designated Collection Facilities for recycling. Suggest this is included for completeness. Should ensure that new developments make it easier for people to recycle.	Noted and agree.
Environment Agency	CSPO525	15. Delivering Sustainable Development Standards Para 15.1	15.1 "Water efficiency techniques" should be inserted after "low-carbon energy technologies" in line 2.	Noted and agree.
Environment Agency	CSPO526	15. Delivering Sustainable Development Standards	We are pleased that you have recognised the link between the provision of green infrastructure and flood risk. It should also be noted that SUDS also can have benefits for attenuating pollution	Noted.
Environment Agency	CSPO527	15. Delivering Sustainable Development Standards	Support the emphasis on SUDS in new development. Type of SUDS should take account of location, infiltration SUDS should not be used on contaminated land, however, other SUDS techniques such as green roofs and attenuation tanks would be appropriate.	Noted.
Environment Agency	CSPO528	15. Delivering Sustainable	15.2 We suggest that you state that the Code for Sustainable Homes requires	Noted and agree.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		Development Standards Para 15.2	water efficiency as well as energy efficiency.	
Environment Agency	CSPO529	15. Delivering Sustainable Development Standards Para 15.4	<p>15.4 We are pleased to see that the over abstracted status of the aquifer is recognised. Greater consideration of water supply should be given considering the proposed levels of growth in the district.</p> <p>We support maximising opportunities for grey-water recycling and rainwater harvesting.</p>	Support is noted. Include reference to Water Cycle Study within the Submission Core Strategy.
Environment Agency	CSPO530	15. Delivering Sustainable Development Standards	15.6 We support increasing opportunities to recycle waste. Consideration could be given requiring major developments to submit a Waste Management Plan when submitting planning applications.	Support is noted.
The Coal Authority	CSPO60	15. Delivering Sustainable Development Standards Para 15.11 (Subsidence)	<p>Raises the issue of the legacy of previous mining activity and the potential issues which can arise from this. Within Wyre Forest area the main mining legacy issues which need to be identified are mine entries and site specific recorded coal mining related hazards.</p> <p>Argues that para 15.11 fails the consistency with national policy test of soundness. Wyre Forest contains coal resources, some of which will have been worked in the past. Mining activities can</p>	Noted. This is considered to be important information. The legacy of coal mining activity will be referred to within the Submission Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>have an impact on land stability and it is recommended that within paragraph 15.11 (subsidence) that a reference to previous mining activities is included. Where previous coal mining workings are reported as having occurred at shallow depth, The Coal Authority will not be able to specifically confirm that ground movement should have stopped.</p> <p>Developments within the GDPO 1995 (as amended) Article 10(j) areas, as advised by The Coal Authority, currently should be receiving an advisory note on permissions granted which refers to The Coal Authority Standing Advice (Revised 2008) This is an interim measure to ensure that land instability caused by former mining activities, including subsidence, do not adversely impact on the safety and stability of future developments.</p>	
Worcestershire County Council	CSPO225	15. Delivering Sustainable Development Standards	Welcomes identification of water abstraction as an issue and core policy 6 but raises concern as to whether the Core Strategy has taken account of the Environment Agency's Draft River Basin Management Plans in regards to sustainable development, flood risk and pollution?	Noted. These documents have been scoped within the Sustainability Appraisal process.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Upper Arley Parish Council	CSPO262	15. Delivering Sustainable Development Standards	The carbon footprint of mobile homes and chalets is very poor compared to traditional housing. They use a significant amount of metals such as aluminium and make use of low levels of insulation resulting in poor U ratings for such accommodation.	Noted.
Upper Arley Parish Council	CSPO264	15. Delivering Sustainable Development Standards	We consider that future planning applications should incorporate some form of green assessment and/or U rating so that e.g. high levels of insulation form part of the plans.	Noted. However, this is addressed through Building Regulations.
The Inland Waterways Association (Birmingham, Black Country & Worcestershire Branch)	CSPO152	15. Delivering Sustainable Development Standards	Welcome the proposals to use the River Severn to develop a series of weirs to generate green hydro-electricity.	Noted. However, this option is one of the options which has been considered and has not been carried forward within the Core Strategy at this stage. This has been identified as such within the Preferred Options paper.
The British Wind Energy Association	CSPO27	15. Delivering Sustainable Development Standards	Recommends inclusion of an overarching Climate Change policy in the Core Strategy. Recommends inclusion of discrete, proactive policies on energy efficiency, renewable energy, sustainable design and construction within Development Control Policies DPD.	Noted. However, the District Council is not producing a Development Control Policies DPD following advice from GOWM. This will be dealt with instead through the Core Strategy and Site Allocations and Policies DPDs.
The British Wind Energy Association	CSPO28	15. Delivering Sustainable Development Standards	Emphasises the need to include a robust criteria based policy that will be used to assess all applications for renewable energy developments. Provides guidelines	Noted. However, the District Council is not producing a Development Control Policies DPD following advice from GOWM. This will be dealt with instead

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			on determining applications in relation to renewable energy developments.	through the Core Strategy and Site Allocations and Policies DPDs.
The British Wind Energy Association	CSPO29	15. Delivering Sustainable Development Standards	<p>Puts forward recommendations for a policy on low and zero carbon developments. Focuses on encouraging smaller scale renewable energy schemes through positively expressed policies in LDDs as stated in PPS 22.</p> <p>Strongly urges the Council to implement a policy for the mandatory requirement of onsite renewables, requiring onsite renewables to provide electricity for at least 10% of all new buildings needs and suggests some wording.</p> <p>Urges the Council to ensure it has an evidence based understanding of the local feasibility and potential for renewable and low carbon technologies to supply new development in the area. Sets out a 4 point strategy based on an evidence based approach for LPAs to follow.</p> <p>Recommends that DPDs encourage all forms of renewable energy and that the potential for an Energy Services Company and site wide CHP should also be considered for inclusion.</p>	<p>Noted. The District Council's preferred option includes a requirement for 10% of the forecast energy supply of new developments to come from renewable energy sources. The wording suggested will be considered in the development of the Submission Core Strategy.</p> <p>Worcestershire County Council has commissioned a County wide study into renewable energy feasibility which will provide the evidence base for the Core Strategy.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Severn Navigation Restoration Trust	CSPO178	15. Delivering Sustainable Development Standards	Promotes the generation of hydro-electric power from the River Severn using a series of weirs.	Noted. This option has been tested against the Sustainability Appraisal framework and has not been carried forward as a preferred option.
Council for British Archaeology West Midlands	CSPO85	15. Delivering Sustainable Development Standards	This section needs to state that safeguarding the historic environment is part of sustainability because the historic environment is a non-renewable resource. Re-use of buildings, as already mentioned here, can include preservation of historic buildings through re-use.	Noted. Historic landscape Character will be dealt with more clearly under the Rural development and Countryside Protection and Green Infrastructure chapters of the Submission Core Strategy.
Campaign to Preserve Rural England	CSPO320	15. Delivering Sustainable Development Standards Para 15.4-15.5	Welcomes the proposals for rainwater harvesting and recycling. Also need to restrict paving to reduce run-off.	Noted.
Country Land & Business Association	CSPO440	15. Delivering Sustainable Development Standards	<p>Sets out background information rural planning.</p> <p>Argues that the Core Strategy must provide for sufficient infrastructure for employment sites, transport, housing, and public and private services to support the needs of sustainable rural communities. The framework should avoid sterilising large parts of rural areas by over concentration on urban areas. Small scale sustainable development can and should be permitted to enhance the viability of rural settlements and maintain their</p>	<p>Background information is noted.</p> <p>The Core Strategy, through its policy on Rural Development and Countryside Protection, will seek to balance environmental protection and the diversification of the rural economy.</p> <p>Support for sustainable communities and SUDS is noted.</p> <p>The Core Strategy sets out a policy which requires 10% of the forecast energy requirements of new development</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>service provision. Redevelopment of existing buildings, even in remote locations, is in our view more sustainable than their loss and eventual demolition when redundant, with the entailed loss of embodied carbon and the impact on the rural economy.</p> <p>CLA recommendation: The core strategy must positively promote flexible policies that recognise the importance of the need to take a balanced approach to the concept of sustainable development, and as such all three pillars (economic, social, and environmental) should be taken into account as part of decision-making principles. The CLA points the local planning authority in the direction of draft PPS4 Planning for Sustainable Economic Development in this regard.</p> <p>Welcomes sustainable communities, argues however, that reducing the need to travel would disadvantage rural communities.</p> <p>Welcomes the requirement for SUDS.</p> <p>Argues that the Core Strategy should promote the use of renewable energy</p>	<p>to be met from renewable energy sources. This will be further refined during the development of the Submission Core Strategy. The Core Strategy also supports free-standing renewable energy developments subject to their compliance with other policies. The Site Allocations and Policies DPD will look to allocate areas for larger-scale renewable energy development.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			through the planning system and avoid placing unnecessary barriers in the way of development. The Merton Rule should be adopted and the Core Strategy should positively welcome renewable energy developments in the wider countryside, including, but not limited to biomass, biogas, heat and CHP developments. A well managed approach to wind energy should be adopted with encouragement for single turbines to provide for farm needs and a careful assessment of the wide impact of larger scale proposals. Energy crops and new woodland creation should be welcomed in rural areas whether designated countryside or not.	
Wyre Forest District Council	CSPO348	15. Delivering Sustainable Development Standards	<p>Climate change should be given greater priority from the start of the document e.g., by including it as a section within the spatial portrait</p> <p>CO2 emissions - currently only domestic figure is included, industry and commerce figure should also be included.</p> <p>P.51 - UK target for reducing CO2 emissions is now 80% by 2050.</p> <p>Worcestershire Climate Change Impacts study identifies likely impacts for the</p>	<p>Noted. Consider including climate change as a section within the spatial portrait.</p> <p>Revise figures on page 51.</p> <p>Ensure Worcestershire Climate Change Impacts study is considered in the development of the Submission Core Strategy.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			county.	
Wyre Forest District Council	CSPO356	15. Delivering Sustainable Development Standards	Delivering Sustainable Development Standards p50 section 15.2 - 'encouraging' development ahead of national timescale/ meeting BREEAM very good or excellent- could this be strengthened to 'requiring'? (Also for Core Policy 6 on page 53).	Noted. However, the Core Strategy can not require these standards ahead of the national timescale.
Wyre Forest District Council	CSPO361	15. Delivering Sustainable Development Standards	How will development proposals be assessed for sustainability & climate change issues? E.g. use of West Midlands sustainability Checklist; UK Climate Impacts Programme Adaptation Wizard.	Noted. This will be clarified within the Submission Core Strategy.
Mr Robin Pearson	CSPO7	15. Delivering Sustainable Development Standards	Exceed current building regulations with regard to energy efficiency for all future housing stock. Introduce effluent digesters into the sewerage system to reduce impact of waste products. Sink mounted waste disposal units should be installed in all new dwellings. Ensure all utilities work is undertaken prior to build commencing to minimise disruption.	Noted. However, this level of detail is beyond the remit of the Core Strategy.
Revd Hugh Burton	CSPO19	15. Delivering Sustainable Development Standards Para 15.16	Surprised to see no mention of transport within Section 15. Buildings need to incorporate sustainable access. Also needs to incorporate plans for improving existing stock as well. 15.6 mentions energy crops - now discredited as a sustainable energy	Support is noted. Transport is dealt with as a separate policy area, clarify the linkages between these issues within the Submission Core Strategy. Improving the energy efficiency of the existing built stock is beyond the remit of the Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			source, suggest omitting. Mostly very exciting though.	
West Midlands Regional Assembly	CSPO409	Core Policy 6	Core Policy 6 - Preferred Approach to Delivering Sustainable Development Standards generally accords with emerging WMRSS policies SR1 and SR3 and published WMRSS Policy EN1.	Noted. Support is welcomed.
Environment Agency	CSPO531	Core Policy 6	Water efficiency should be included within the wording of the text i.e. at the end of the first sentence of the second para insert "... and secure water efficiencies".	Noted and agree.
Natural England	CSPO464	Core Policy 6	<p>Endorses the consideration of local sustainability issues which underpins the policy directions. Welcomes the preferred approach, particularly the 10% renewable energy requirement. It is important that all new developments are climate proofed.</p> <p>Council should be aware that the implementation of the Code for Sustainable Homes has not yet been agreed and may be based on areas rather than individual buildings. Suggests new developments are required to comply with the Code in line with the national timescale.</p> <p>The renewables audit is ambitious and the scope is not clear. Offers support with this. Natural England is currently in the</p>	<p>Support is noted.</p> <p>The current preferred option requires new developments to meet the Code for Sustainable Homes requirements in line with the national guidelines but also encourages developers to do this ahead of national timescales where feasible.</p> <p>The renewables audit is a study which has been commissioned by Worcestershire County Council. The results of this will feed into the Submission Core Strategy and will provide valuable evidence base.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			process of mapping the deliverability of wind power and will provide information once available. The study should also consider the Grow with Wyre project.	
English Heritage	CSPO433	Core Policy 6	We welcome the recognition the policy gives to promoting the reuse of existing buildings. Locations for free standing renewable and low carbon energy developments must be informed by historic environment considerations. English Heritage has produced a series of policy statements on climate change and renewable energy technologies which should inform this.	Noted. Refer to the English Heritage guidance notes when developing the Submission Core Strategy.
Worcestershire County Council	CSPO226	Core Policy 6	<p>Core policy 6 should make reference to the need for site waste management plans. Supports the reference to the need for waste to be stored before collection.</p> <p>The 6th bullet point is a rewording of the RSS policy and not really locally specific, i.e. with projects such as the Grow The Wyre, a greater emphasis could perhaps be placed on CHP.</p> <p>Suggests that existing, historic building stone quarries should be protected from development as currently little suitable building material is produced in the region and none in the District. The Submission</p>	<p>Support is noted. Refer to the need for site waste management plans within the Submission Core Strategy, although this should not repeat national policy.</p> <p>Noted. Reword the 6th bullet point to make it more locally specific.</p> <p>Noted. Consider the need to safeguard historic building stone quarries when developing the Submission Core Strategy.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Core Strategy or background material could usefully refer to this issue, perhaps in para 6.24 or Core Policy 6. Any such policy can be justified using MPS 1 Annex 3 paragraphs 3.1 to 3.5 and 3.14 re the protection of such sites for their value for building stone per se and PPS 9 re the protection of sites of geological interest. English Heritage is currently working on a policy statement for this.	
British Waterways	CSPO257	Core Policy 6	<p>BW would wish to highlight that there may be opportunities in major waterside developments to use heat pump technology for the heating and cooling of buildings which are next to the waterway.</p> <p>Supports the principle of SUDS but is concerned that increased flood risk can arise if systems are not managed by a local authority or sewerage undertaker.</p>	<p>Noted. The use of canals for heating and cooling has been tested as an option but has not been carried forward at this stage. Whilst the Core Strategy will set a requirement for 10% of energy to come from low or zero carbon sources, it is not the role of the Core Strategy to prescribe how this is achieved.</p> <p>Concerns relating to SUDS are noted and will be clarified through the Submission Core Strategy.</p>
The Inland Waterways Association	CSPO163	Core Policy 6	Endorse this policy.	Support is noted.
Wyre Forest Friends of the Earth	CSPO57	Core Policy 6	Merton Rule is now expressed in terms of a reduction in CO2 emissions rather than a proportion of energy requirements from renewable energy, this prevents developers installing carbon intensive	Noted. Consider this when developing the submission Core Strategy. However, the threshold set and the target will be dependent upon economic viability.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>technologies such as electric heating. Other changes include reducing the threshold at which the policy becomes applied and increasing the target above 10%. WFDC should make all new developments zero-carbon well before 2016 and promote micro-generation.</p> <p>Suggests policy wording: The Council will require all non-residential developments either new build, conversion or extension, with a floor space of 500m³ or greater, to incorporate on-site renewable energy equipment to reduce predicted CO₂ emissions by at least 20%. All new residential units must achieve Code for Sustainable Homes Level 5. Level 6 will be required by 2014.</p> <p>Also need to address energy efficiency in existing housing stock, the planning process can play a small part in this by conditioning extensions to achieve an overall reduction in net energy requirements. Recommends Council adopt this policy as SPD on home extensions.</p>	
Campaign to Preserve Rural England	CSPO321	Core Policy 6	Suggests removing threshold or having a very low threshold for which there is some objective reason, so that all new dwellings	Noted. However, the threshold is in line with national planning policy guidance.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			are required to provide 10% energy from renewable or low-carbon sources.	
Worcestershire Wildlife Trust	CSPO105	Core Policy 6.	Supports the policy approach but recommends that the wording be strengthened. Suggests that all development should be required to meet the very highest standards and recommends including a presumption in favour of 'soft' engineering solutions to SUDS.	Noted. Amend section on SUDS to set out a presumption in favour of 'soft' engineering solutions.
West Midlands Safari Park	CSPO190	Core Policy 6	Supports the requirement for new development to be sustainable and meet high levels of energy efficiency. All future developments at WMSLP will endeavour to be green developments working towards preserving the natural environment. Raises concern that the current Green Belt policy will restrict the development of green infrastructure and suggests it should be amended through the emerging Core Strategy.	Noted. Any future development at WMSLP will need to comply with the Sustainable Development Standards set out within the LDF. It is difficult to conceive that the green belt policy would restrict the development of green infrastructure.
Kidderminster Property Investments	CSPO299	Core Policy 6	Supports general approach. Reference to viability is considered to be important and necessary. The residential regeneration of Churchfields North will comply with the national implementation of Code for	Support is noted. Viability will be considered through the Strategic Housing Land Availability Assessment, this will feed into the Submission Core Strategy and the Site Allocations and Policies DPD.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Sustainable Homes.	
British Sugar Plc	CSPO390	Core Policy 6	<p>We would support the Council's approach to Delivering Sustainable Development Standards; this is acknowledged to be an important agenda at local, regional and national level.</p> <p>Promotes a site off Wilden Lane where all sustainability criterion set out within the policy could potentially be met. Given the lack of constraints, development at the site could lead to a very highly sustainable development and provide a benchmark regionally and locally.</p>	<p>Support is noted.</p> <p>The allocation of specific sites for development will be considered through the Site Allocations and Policies DPD and the SHLAA process.</p>
A R Price	CSPO388	Core Policy 6	<p>Raises objection to the policy on the basis that there are genuine questions regarding the appropriateness of moving beyond code level 4 of the CSH. There is no basis for the Council to require or even encourage a higher than nationally required code level to be achieved.</p> <p>The policy would be much more usefully framed in terms of achieving a reduction of the carbon emissions of new development compared to historic development standards. The policy should reflect upon the fact that the greatest potential for reduced carbon emissions comes from the existing built stock.</p>	<p>Noted. This will be considered during the development of the Submission Core Strategy.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Objection is raised to the requirement for 10% of energy requirements to be met through on-site energy sources. There is no basis for concluding that energy efficiency is best achieved through provision being made on-site. The policy unnecessarily restricts how energy is provided, in a way which may unnecessarily fetter its most efficient provision.	

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Environment Agency	CSPO506	16. Addressing Flood Risk Through Future Development	We can see no reference to the Water Framework Directive in the document and we believe this should be rectified.	Noted. Include reference to this document in the Submission Core Strategy.
Environment Agency	CSPO507	16. Addressing Flood Risk Through Future Development	The River Severn Draft River Basin Management Plan will develop measures to enable us to achieve good ecological status in as many water bodies as possible by 2015, and in all water bodies where it is technically feasible by 2027. This is an important document as part of the evidence base of the LDF and should also be referenced.	Noted.
Environment Agency	CSPO508	16. Addressing Flood Risk Through Future Development	<p>We are able to offer the following information on the capacity of sewage treatment works in the district. This data is also likely to be available and interpreted in the completed Water Cycle Study produced by Royal Haskoning.</p> <p>Severn Trent sites</p> <p>Chaddesley Corbett STW - is unlikely to have any additional capacity under its current consent</p> <p>Kidderminster (Oldington STW), Blakedown STW, Roundhill STW and</p> <p>Belbroughton STW are likely to have some</p>	Noted. This is useful information.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>capacity</p> <p>(Please note that this is estimated using the differences between consented and actual measured discharge flows).</p> <p>Non Severn Trent sites</p> <p>The Bewdley Commercial Centre Ltd (NGR: SO 75448-74203) on the A456, Wyre Forest, Post Code DY12 2UJ(Site 62 on the Employment Land Review Sites plan) has a managed STP.</p> <p>Further development in this area would require new sewerage facilities.</p> <p>Drayton Road sewage pumping station is outside the district boundary but is likely to pump to BelbroughtonSTW. There have been a number of pollution incidents attributed to Drayton Road sewage pumping station. This would need to be investigated before any further properties are added to the system.</p>	
Environment Agency	CSPO532	16. Addressing Flood Risk Through Future Development Para 16.2	16.2 Should state that the SFRA will help facilitate the application of the Sequential Test as well as the Exception Test.	Noted. Clarify this in the Submission Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Environment Agency	CSPO533	16. Addressing Flood Risk Through Future Development Para 16.3	16.3 As stated previously "Flood zones" should be reworded to state "flood zones 2 and 3". (also Para 16.5)	Noted. Clarify this in the Submission Core Strategy.
Environment Agency	CSPO534	16. Addressing Flood Risk Through Future Development	Support the aim of avoiding inappropriate development within flood zones 2 and 3. Sequential approach should be referenced here. Development that has to be located in flood zone 2 and 3 should achieve flood risk betterment through the use of flood storage compensation.	Support is noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Worcestershire County Council	CSPO227	16. Addressing Flood Risk Through Future Development	<p>Please check that the correct document and title have been sourced in paragraph 16.1.</p> <p>Account should be taken of the Environment Agency's Severn Catchment Flood Management Plan. This document identifies different policy unit areas with differing policy approaches towards managing future flood risk. We would encourage you to refer to this document and consider its implications for your strategy.</p> <p>Paragraph 16.4 could usefully include reference to retro fitting of existing properties that are at risk of flooding or have flooded to cope with further flooding events.</p> <p>The Pitt Review recommends that Local Authorities undertake Surface Water Management Plans. This could usefully be referenced within this chapter.</p>	<p>Noted.</p> <p>Ensure the Environment Agency's Severn Catchment Flood Management Plan is considered in the development of the Submission Core Strategy.</p>
Worcestershire Biodiversity Partnership	CSPO74	16. Addressing Flood Risk Through Future Development Para 16.7	The role of wetland habitat creation in helping to manage water levels and attenuate flood waters should be mentioned, in addition to the potential of SUDS to provide biodiversity habitat.	Noted. Include this within the Submission Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Severn Navigation Restoration Trust	CSPO180	16. Addressing Flood Risk Through Future Development	First sentence of Para 16.6 is inconsistent regarding mutual exclusivity of options. Agree with most of the options except allowing development in the flood plains.	This appears to be a typographical error. The sentence should read "The policy options are not mutually exclusive".
Country Land & Business Association	CSPO441	Core Policy 7	Agree that all new developments need to incorporate water cycle management techniques to reduce run-off. Future developments should include SUDS. Core Strategy policies for development in floodplains must be flexible, positive and constructive and take account of rural businesses located within them. It is important that major development proposals are required to take into account the advice of the Environment Agency regarding flood plains and similarly have due regard for shoreline management plans. In general, new greenfield developments should not be sited on flood plains as climate change will undoubtedly exacerbate existing flood risk and thus the cost of defences and insurance. Where unavoidable, suitable mitigation measures and adaptive designs should be used to reduce risk.	Noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
West Midlands Regional Assembly	CSPO410	Core Policy 7	Core Policy 7 - Preferred Approach to Managing Flood Risk is in line with emerging WMRSS Policies SR1 part iii and SR2 part G.	Support is noted.
Environment Agency	CSPO535	Core Policy 7	Recommend that the adoption and maintenance of SuDS is included within the Planning Obligations SPD and that this is referenced in the Core Strategy.	Noted. This will be further considered through the Submission document.
Environment Agency	CSPO536	Core Policy 7	<p>We would recommend stronger wording in the sentence seeking the promotion of opening up culverted watercourses such as that included in saved policy NR6 of the Wyre Forest Local Plan which stated "Proposals should also seek to:</p> <p>(i) conserve the ecological value of the water environment, including watercourse corridors and;</p> <p>(ii) open up any culverted watercourses where practicable.</p> <p>Proposals involving the creation of new culverts will not be allowed."</p>	Noted and agree that this should be strengthened.
Environment Agency	CSPO537	Core Policy 7	We support footnote 9 which recognises the dual function of such flood plain or 'compensation zones' to provide flood risk betterment and biodiversity and amenity (green infrastructure) benefits.	Support is noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Natural England	CSPO465	Core Policy 7	<p>Natural England advocates the use of soft engineering solutions, such as floodplain naturalisation, the creation of reedbeds, the re-wetting of existing wetlands and their promotion as flood water storage areas where appropriate. The use of developer contributions from developments in the floodplain to deliver flood alleviation and protection schemes does not have to result in negative impacts on biodiversity or the green infrastructure network, provided soft-engineering solutions are sensitively used.</p> <p>We fully support the requirement for all new development to incorporate SuDS, and strongly recommend the use of SuDS schemes to enhance existing wetlands, such as Wilden and Puxton marshes, where possible. Preference should be given to soft-engineered SuDS which are integrated into the green infrastructure network. We also welcome the commitment to the restoration of culverted watercourses.</p>	Support is noted.
Wychavon District Council	CSPO133	Core Policy 7	Support the fact that all new development should adopt SUDs.	Support is noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
British Waterways	CSPO258	Core Policy 7	Notes and supports statement in paragraph 16.3 that 'it is particularly important to balance' flood risk considerations 'with the need for continuing regeneration within Kidderminster and Stourport-on-Severn. Emphasises that the flood map does not account for any flood alleviation role associated with the canal. This should be assessed within phase two to the SFRA. BW wishes to work closely with the Council in the development of the SFRA 2. It should be noted that the breach of the Stourbridge Town Arm was caused by the River Stour inundating the canal at the end of the line.	Noted. These comments are important and the SFRA level 2 will consider these in more detail.
Kidderminster Civic Society	CSPO495	Core Policy 7	Support the reference to opening up culverted sections through new developments.	Support is noted.
The Inland Waterways Association (Birmingham, Black Country & Worcestershire Branch)	CSPO164	Core Policy 7	Whilst we note and support the Council's commitment to SUDs we are surprised that there is no reference to either the River Severn Catchment Flood Management Plan or the Draft River Severn Basin Management Plan. Both have been written by the Environment Agency and are mandatory planning documents, the latter being the implementation of the EU's Water Framework Directive that has also been	Noted. These documents have been scoped through the SA process to inform the Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			overlooked.	
Campaign to Preserve Rural England	CSPO322	Core Policy 7	<p>Welcomes policy in principle but:</p> <ol style="list-style-type: none"> 1. Care must be taken that development adjacent to the waterways leaves a flood channel with a sufficient cross-section to carry floodwater. This may involve raising habitable space on stilts above flood levels or setting it back from riverbanks. 2. Any further flood containment areas must have a full archaeological assessment of any watermills and of all associated artificial watercourses. This was not done in the case of the containment area below Wolverley, where irreparable damage was done to the mill leat, which was probably made as part of Yarranton's Stour Navigation, apparently without any recording being undertaken. 	Noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Worcestershire Wildlife Trust	CSPO106	Core Policy 7.	Welcome support for SUDS and the de-culverting of watercourses but object to the wording regarding flood storage compensation. Suggest that this be significantly strengthened to make clear that there is a strong presumption against development in the floodplain and that it will only be allowed in exceptional circumstances, where flood storage compensation will be required in line with national guidance.	Noted. Ensure that policy in Submission Core Strategy clarifies strong presumption against development in floodplains.
British Sugar Plc	CSPO398	Core Policy 7	Supports the policy. Promotes a site off Wilden Lane which does not lie within a floodplain. Development of the site incorporating a SUDS scheme could contribute towards the adjacent wetland habitat.	Support is noted.
A R Price	CSPO404	Core Policy 7	The approach of this core policy to the management of flood risk is supported.	Support is noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Mrs Enid Stanley	CSPO2	17. Rural Development and Countryside Protection	Expresses disappointment over the loss of species from the Wyre Forest as a result of too many people spoiling the habitat.	Noted. The Core Strategy will help to safeguard the biodiversity of the District.
Mrs Enid Stanley	CSPO3	17. Rural Development and Countryside Protection	Expresses concern over the dangers that barbed wire poses to wildlife. Expresses concern that over-population and free access to wild habitats are ruining the countryside.	Noted. The District Council is currently in the early stages of developing a green Infrastructure Study, this will help to safeguard biodiversity and will identify wildlife corridors.
Mrs Fay Hodgkiss	CSPO80	17. Rural Development and Countryside Protection Para 17.11	Supports the restriction of further caravan, mobile home and chalet sites to the west of the District. Refers to Rock Parish Plan which looks to B&B accommodation instead.	The Core Strategy seeks to restrict the further development of mobile home/caravan/chalet developments into the future. This will be further clarified through the landscape character SPD.
Herefordshire & Worcestershire Earth Heritage Trust	CSPO134	17. Rural Development and Countryside Protection Para 17.7	Support the use of a landscape character approach to rural development and countryside protection.	Support is noted.
Mrs Beryl Lewis	CSPO170	17. Rural Development and Countryside Protection Para	Wishes to see no further development of caravans, mobile home and chalet sites to the West of the District.	Noted. The Core Strategy seeks to restrict the further development of mobile home/caravan/chalet developments into the future. This will be further clarified

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		17.11		through the landscape character SPD.
Mrs Nina Potter	CSPO171	17. Rural Development and Countryside Protection Para 17.11	Restrict further development of caravan, mobile home and chalet sites to the west of the District in order to protect the landscape.	The Core Strategy seeks to restrict the further development of mobile home/caravan/chalet developments into the future. This will be further clarified through the landscape character SPD.
Mr Ian Orford	CSPO172	17. Rural Development and Countryside Protection	Expresses concern over the number of caravan/chalet and mobile home developments within the District.	Noted. The Core Strategy seeks to restrict the further development of mobile home/caravan/chalet developments into the future. This will be further clarified through the landscape character SPD.
West Midlands Safari Park	CSPO194	17. Rural Development and Countryside Protection	<p>The Core Strategy should include a policy setting out the Council's approach to development within the Green Belt. Acknowledges that the West Midland Safari and Leisure Park is within the Green Belt and the role which the green Belt plays in keeping Kidderminster and Bewdley separate. Argues that the WMSLP has an important role to play in job creation and attracting tourists and as such the Core Strategy should be flexible to allow the site to evolve.</p> <p>Recommends that the WMSLP is</p>	<p>The identification of the WMSLP as a major developed site in the Green Belt would need to be carefully considered through the Site Allocations & Policies DPD. It is not the role of the Core Strategy to identify sites, neither should it repeat national planning policy set out in PPG 2, which remains a material consideration in relation to any development undertaken by WMSLP.</p> <p>Should the WMSLP be identified as a major developed site in the Green Belt through the Site Allocations & Policies</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			identified as a major developed site within the Green Belt by a new policy in accordance with PPG2. Within a major developed site infilling is allowed and the redevelopment of existing buildings is permitted subject to the existing footprint of the building not being increased.	DPD, it would be subject to a detailed development brief to ascertain the types of development that may be acceptable in accordance with PPG2. However, there are many factors to consider before the Site Allocations & Policies DPD is submitted. This document is in its initial stages of consultation.
West Midlands Safari Park	CSPO195	17. Rural Development and Countryside Protection	<p>The WMSLP will play a key role in diversifying and growing the District's economy in line with spatial objective 2. It is a strategically important site for the Wyre Forest and the West Midlands and should be identified on the Spatial Diagram and have two new policies related to its future development.</p> <p>We believe the site should be identified as a major developed site within the Green belt which has happened with other major parks. It would be useful for the Core Strategy to contain a policy setting out what development would be acceptable within the Park.</p> <p>We recommend that the WMSLP is</p>	<p>Disagree. It is not the role of the Core Strategy to allocate Major Developed Sites in the Green Belt and associated policies.</p> <p>Furthermore, the WMSLP is not considered to be an appropriate site for designation as a strategic site to be identified on the key diagram in light of advice as set out in PPS 12. This states that "Core Strategies may allocate strategic sites for development. These should be those sites considered central to the achievement of the strategy." Strategic sites are therefore those which would meet the requirements for housing and major employment provision. For example, key regeneration sites</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>included on the key diagram and the following policy is included:</p> <p><i>"The WMSLP is one of the Wyre Forest's and the Region's most popular tourist facilities. Developments that are required to support the continued operation and growth of the park will be supported.</i></p> <p><i>The West Midlands Safari Park is designated as a Major Developed Site in the Green Belt. Planning Applications within the park boundaries proposing the development of new park infrastructure and buildings/structures relating to the day to day operation of the park will be treated favourably. Such infrastructure could include:</i></p> <ul style="list-style-type: none"> - New rides - Kiosks - Animal Enclosures - Access and circulation roads - Support buildings <p><i>All new buildings/structures are required to</i></p>	<p>focussed on central Kidderminster.</p> <p>Recommend that WMSLP submits separate submissions in relation to the Site Allocations & Policies DPD Issues and Options Paper, where the consideration of the site's future role would be more appropriate.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p><i>be in keeping with the character and nature of the safari park.</i></p> <p>A second policy is required in order to aid the development of a new hotel and conference facility which would help diversify the economic base of WMSLP and create additional, all year round jobs. The WMSLP is an ideal location for visitor accommodation. We recommend that the following policy be included within the Core Strategy:</p> <p><i>" There will be a presumption in favour of the development of a hotel and/or conference facility at the West Midlands Safari Park, providing that the development does not have an adverse impact on Kidderminster town centre, Stourport-on-Severn or Bewdley. Any new facility of this nature must be acceptable in terms of transport impact."</i></p>	
Worcestershire County Council	CSPO228	17. Rural Development and Countryside Protection	Could the market towns policy mentioned in Core Policy 4 be located in this section? There is no wording on the Rural Regeneration Zone despite reference to it	Noted. The Rural Regeneration Zone will be covered by the market towns policy. This will be clarified within the Submission Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>at 12.5. Need to be clear why policy wording is not included in the Core Strategy, e.g relying on regional policy.</p> <p>Reference to the County Council's Landscape Character work is welcomed. Please seek our involvement on the proposed Landscape Character SPD. Please include reference to the Historic Landscape Characterisation work currently being undertaken.</p> <p>Reference to Landscape Protection Areas (paras 17.2 and 17.3) should be removed and the Worcestershire Landscape Character Assessment should be used to inform policy in line with PPS7.</p> <p>There is a slight misinterpretation within para 17.5 of the RSS Policy RR2: Rural Regeneration Zone, one is not done through the other, they are both elements which contribute to the wider goal set out by the RSS.</p> <p>We would welcome further explanation of</p>	<p>Noted. Include reference to Historic Landscape Characterisation work.</p> <p>Noted. However, Landscape Protection Areas refers to those areas set out within the existing Local Plan. The Core Strategy and the Landscape Character SPD will safeguard the unique landscape of the District using the Landscape Characterisation work undertaken by County Council.</p> <p>Clarify this in the submission document.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>how Parish Plans will be used to inform the SPD.</p> <p>Raises concern that the policy only addresses countryside protection and not rural development.</p>	
Upper Arley Parish Council	CSPO249	17. Rural Development and Countryside Protection Para 17.11	<p>We welcome the statement at 17.11 in the Preferred Options Paper to 'restrict further development of caravan, mobile home and chalet sites tot he west of the District'. However, we would like to go further by providing that for the Parish of Upper Arley no further development be permitted.</p> <p>In July 2006 a survey showed that with a radius of 1.8 miles from the centre of Button Oak there were 7 caravan sites with mobile homes, containing 336 mobile homes as compared to 128 houses.</p>	Noted. This will need to be given further consideration through the Landscape Character SPD.
Campaign to Preserve Rural England	CSPO323	17 Rural Development and Countryside Protection	Origins and extent of the Rural Regeneration Zone are not clear. It should not lead to significant differences in policy between the RRZ and the rest of the area west of the River Severn.	Noted. The RRZ boundary was established at regional level. This will be clarified in the submission document.
Campaign to	CSPO324	17. Rural	Raises the issue that Parish Plans are not	Noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Preserve Rural England		Development and Countryside Protection Para 17.10	available on the internet. If the District Council has not adopted them they should still be made available with a suitable caveat.	
Wyre Forest District Council	CSPO373	17. Rural Development and Countryside Protection Para 17.13	Once again the issue re intensive horse grazing.	Noted. This is an important issue specific to the District which will require further consideration through the Landscape Character SPD.
Government Office for the West Midlands - Planning Team	CSPO207	Core Policy 8	With regards to safeguarding the District's landscape, it is noted that you will be producing a Landscape Character SPD to provide further guidance on development standards within the open countryside. However, you must note that SPDs should not set out policy but add detail to policies contained in DPDs.	Noted. The Landscape Character SPD will add additional detail to the core policy set out within the Core Strategy. This will be clarified within the Submission Core Strategy.
West Midlands Regional Assembly	CSPO411	Core Policy 8	Core Policy 8 - Preferred Approach to Rural Development and Countryside Protection generally aligns with published WMRSS Policies QE5 and QE6.	Support is noted.
Natural England	CSPO466	Core Policy 8	Preferred approach focuses on landscape and should be expanded to cover biodiversity, geodiversity, the delivery of ecosystem services, public access and	Support is noted. These comments are useful.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>contact with nature.</p> <p>Fully support the use of Worcestershire's Landscape Character Assessment and the intended production of a Landscape Character SPD for the District. Landscape also needs to be considered within the context of green Infrastructure. Until this evidence is pulled together it is difficult to see how any restrictions on mobile homes and chalets can be based on sound evidence.</p>	
English Heritage	CSPO434	Core Policy 8	Supports the commitment to develop a criteria based policy which will be informed by the County's Historic Landscape Characterisation Assessment, in addition to the commitment to produce a Landscape SPD. The Historic Landscape Characterisation must also be taken into account and form an integral part of the SPD.	Noted. The Historic Landscape Characterisation will be included within the Submission Core Strategy and the SPD.
Worcestershire County Council	CSPO229	Core Policy 8	<p>The second sentence in the first paragraph should be amended to read:</p> <p>"This will be based on the Worcestershire</p>	Noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>County Landscape Character Assessment and its analysed Sensitivity to Change."</p> <p>In addition, the last sentence in the second paragraph should read:</p> <p>"It will take account of the Worcestershire County Landscape Character Assessment and the Worcestershire Historic Landscape Characterisation in addition to relevant Parish Plans and Village Design Statements."</p>	
Upper Arley Parish Council	CSPO263	Core Policy 8	In the Preferred Options Paper at Section 17 there is the proposal for a SPD for Rural development and Countryside Protection. We would welcome this if it provided that any such SPDs should involve consultation with Parish Councils, and in particular those which have produced Parish Plans.	Support is noted. Consultation with Parish Councils will be undertaken.
Kidderminster Civic Society	CSPO496	Core Policy 8	Although generally beyond the remit of Kidderminster Civic Society we do recognise the importance of diversity in rural areas if they are to survive.	Noted.
The Inland	CSPO165	Core Policy 8	We unreservedly support the Council's	Support is noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Waterways Association			proposal.	
Council for British Archaeology West Midlands	CSPO86	Core Policy 8	Welcome the use of Historic Landscape Characterisation.	Support is noted.
Country Land & Business Association	CSPO442	Core Policy 8	Rural areas must have the opportunity to be economically sustainable, diversify and grow.	Noted.
Mr. John Organ	CSPO9	Core Policy 8	Concerned about the impact of mobile homes on the infrastructure in the Pound Green area. Suggests that no further development should be allowed.	The Core Strategy seeks to restrict the further development of mobile home/caravan/chalet developments into the future. This will be further clarified through the landscape character SPD.
Mr Nick Hodgkiss	CSPO169	Core Policy 8	Supports the restriction of further mobile home and caravan sites into the future.	Support is noted.
Mr Robin Hardwick	CSPO176	Core Policy 8	Agree with restricting development of new and existing caravan sites.	Support is noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Environment Agency	CSPO538	18. Providing a green infrastructure network and supporting local biodiversity	Supports the aim of safeguarding floodplains from development. The word 'natural' in para 18.2, 18.10 and 18.12 should be deleted as there are many important man-made features which reduce flood risk. This should be amended anywhere else in the document where this phraseology occurs.	Noted. Clarify the importance of man-made flood protection features/artificial flood storage areas in the Submission Core Strategy.
Worcestershire County Council	CSPO230	18. Providing a green infrastructure network and supporting local biodiversity	Green Infrastructure is clearly an important cross-cutting theme and its inclusion within the LDF is welcomed. The issue clearly requires more cohesive integration with a number of other policies, we would welcome its explicit incorporation into objectives 5,7,9 and 11. The Green Infrastructure network should include the full spectrum of privately and publicly owned rural and urban open spaces.	Support is noted. Revise objectives 5,7,9 and 11 to include reference to green infrastructure.
Worcestershire County Council	CSPO232	18. Providing a green infrastructure network and supporting local biodiversity	Please note that with regards to paragraph 18.2 it should be noted that many green spaces have added value by virtue of containing and protecting archaeological sites and monuments. Indeed some open spaces have been protected because of their significance to the historic environment and reference to this should be made in the text.	Noted. Refer to this within the supporting text.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Worcestershire County Council	CSPO233	18. Providing a green infrastructure network and supporting local biodiversity Para 18.5	It should be noted that the conflict alluded to in paragraph 18.5 between natural habitats and movement of biodiversity may not necessarily be a significant constraint: often a mosaic of intricate habitats may enhance the ecological function of a green corridor.	Noted. This will be further considered through the Green Infrastructure Study.
Worcestershire County Council	CSPO234	18. Providing a green infrastructure network and supporting local biodiversity Para 18.2 - 18.6	Roles of an effective green infrastructure network are described well. However the focus on waterways as green corridors explicitly for the purposes of leisure and transport is a restrictive model. A more inclusive model should be demonstrated. The development of biodiversity rich connecting habitat rather than simple physical linkages should be encouraged and the biodiversity value of green infrastructure highlighted.	Support is noted. The green infrastructure study will consider the wider green infrastructure elements and linkages and their roles in protecting and enhancing biodiversity. This will be further clarified through the submission core strategy.
Worcestershire County Council	CSPO235	18. Providing a green infrastructure network and supporting local biodiversity Para 18.6	Supports the proposal to undertake a Green Infrastructure Study within the District, would like to see more detail within that report regarding habitat fragmentation. It is unclear how the Green Space Plan will relate to the Green Infrastructure Study - developing the green infrastructure study into a green infrastructure strategy may be a better option.	Support is noted. The Green Space Plan and Green Infrastructure Study are the same document. This will be clarified within the Submission document.
Worcestershire County Council	CSPO236	18. Providing a green	Welcomes the requirement for new developments to contribute towards	Support is noted. Further detail on S106 contributions will be developed through

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		infrastructure network and supporting local biodiversity Para 18.8	Biodiversity Action Plan targets. We would however encourage that the revised Planning Obligations SPD provides an unambiguous mechanism through which this contribution could be assessed, delivered and monitored. We support the proposal to safeguard allotments as described within paragraph 18.9.	the Revised Planning Obligations SPD.
Worcestershire County Council	CSPO268	18. Providing a green infrastructure network and supporting local biodiversity Para 18.7	The Green Infrastructure Study should include an assessment of the historic environment as an integral assessment. Further detail is available from the County Council Historic Environment and Archaeology service.	Noted. The Green Infrastructure Study will consider the historic environment. This is also an approach advocated by English Heritage.
Worcestershire County Council	CSPO269	18. Providing a green infrastructure network and supporting local biodiversity	We would like to see reference made to quality standards for Greenspace such as Green Flag.	Noted.
Worcestershire County Council	CSPO270	18. Providing a green infrastructure network and supporting local biodiversity	We would like to see reference to the importance of the public rights of way network for utilitarian journeys (health and traffic benefits) and recreation and tourism e.g. Worcestershire Way and Severn Way.	Noted. The Rights of Way Network will be considered in more detail within the Green Infrastructure Study.
Worcestershire County Council	CSPO271	18. Providing a green infrastructure	We think it would be helpful if this section made the protection of geodiversity more explicit.	Noted. Consider how the protection of geodiversity can be made more explicit within the Submission Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		network and supporting local biodiversity		
The Coal Authority	CSPO61	18. Providing a green infrastructure network and supporting local biodiversity	Raises concern that the policy is not consistent with PPG14 as the legacy of mining activity presents a public safety hazard. Advises that mining information is obtained for open space and green networks where previous mining activity has taken place.	Concerns are noted. The mining legacy of individual sites will be considered in more detail at the site allocation stage.
Herefordshire & Worcestershire Earth Heritage Trust	CSPO138	18. Providing a green infrastructure network and supporting local biodiversity Para18.2	Support the inclusion of the Geopark within this paragraph.	Support is noted.
Herefordshire & Worcestershire Earth Heritage Trust	CSPO139	18. Providing a green infrastructure network and supporting local biodiversity Para 18.8	Support the inclusion of BAP targets however, there should be inclusion of Geodiversity Action Plan targets as well. Ensuring that new geological features are created or enhanced where appropriate would be a useful step. It is slightly unclear where geodiversity fits into green infrastructure - perhaps a stronger definition should be included.	Noted. Re-consider the definition of green infrastructure and the role of geodiversity within this. Consider how geodiversity can be included within the wording of the policy within the submission Core Strategy.
Worcestershire Biodiversity	CSPO73	18. Providing a green	Welcomes reference to the role of the development process in implementing the	Support is noted. Review the list in para 18.8. Give further consideration to

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Partnership		infrastructure network and supporting local biodiversity Para 18.8	Biodiversity Action Plan for Worcestershire but this needs to be reflected in the policy wording. Whilst the list at para 18.8 is a welcome inclusion, it should include all semi-natural habitats, not just orchards; and specific habitat creation and restoration targets may be of relevance to Wyre Forest District, such as heathlands.	biodiversity in the policy wording for the submission Core Strategy.
Worcestershire Biodiversity Partnership	CSPO75	18. Providing a green infrastructure network and supporting local biodiversity Para 18.8	Bullet point at para 18.8 should include all SSSI and SWS sites, not just grassland.	Noted. Re-word this to clarify that all SWS and SSSI sites will be protected.
Worcestershire Biodiversity Partnership	CSPO78	18. Providing a green infrastructure network and supporting local biodiversity Para 18.7	The development of a Green Infrastructure study for the area is welcomed, but it must be emphasised that an understanding of the functioning of a green space network (in particular ecological function) is vital to ensure that such a network delivers all of it's intended benefits, especially with regard to facilitating the movement of species.	Noted. This will be considered in more detail during the development of the Green Infrastructure Study.
The Inland Waterways Association	CSPO153	18. Providing a green infrastructure network and supporting local biodiversity	18.10 - Pleased to see that the Council wishes to enhance the environmental role of rivers and waterways, we assume that this includes for the improvement of their biodiversity.	Support is noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Wyre Forest District Council	CSPO374	18. Providing a green infrastructure network and supporting local biodiversity Para 18.8	Wildlife corridors should not just be focussed on wetlands. Dry acid corridors are also needed. Protection of dry acid communities from development also needs to be recognised.	Noted. It is acknowledged that dry acid environments are locally distinct to the District. The Green Infrastructure Study will look at corridors suitable for different types of species, this will inform the Submission Core Strategy.
West Midlands Regional Assembly	CSPO412	Core Policy 9	Core Policy 9 - Preferred Approach to Delivering Green Infrastructure and Supporting Local Biodiversity generally accords with published WMRSS Policies QE4 and QE8.	Support is noted.
Environment Agency	CSPO539	Core Policy 9	Insert in line 2 the District's 'sustainable' regeneration, to refer to the multifunctional value of green infrastructure including flood alleviation and attenuation of pollution	Noted. Insert 'sustainable' as suggested.
Natural England	CSPO467	Core Policy 9	Sets out 5 point green test which Natural England expect developments to meet through consideration and delivery of green infrastructure. Welcomes the consideration of green infrastructure and biodiversity within the preferred options paper, supports the production of the green Infrastructure Study and offers support in bringing this forward. Biodiversity and open space should be	Support is noted. The term Green Infrastructure Plan refers to the green Infrastructure Study - this will be clarified within the Submission Core Strategy. Mention the importance of heathland and acid grassland within the Submission Core Strategy and ensure that the policy safeguards them. Amend reference to the planting of new trees and woodlands to the creation of new appropriate habitats within

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>considered as part of green infrastructure, not as separate issues. Recommends that the green Space Plan be subsumed within the Green Infrastructure Study. Would welcome the adoption of the green Infrastructure Study as SPD or DPD.</p> <p>Role of floodplains, wetlands and waterways is well considered and woodland is given some consideration, however, heathland and acid grassland need to be mentioned.</p> <p>We recommend that the explicit reference to planting new trees and woodlands on appropriate development sites be amended. Woodlands will not always be appropriate (e.g. to the landscape), and do not always have a high biodiversity value. Instead, there should be a requirement to provide increased opportunities for biodiversity by creating appropriate habitats within development sites, delivered in the context of green infrastructure and with due consideration of the Green Infrastructure Study.</p> <p>Consideration should be given to the inclusion of a standardised delivery requirement for green infrastructure within</p>	<p>development sites.</p> <p>Refer to leaflet when producing the Green Infrastructure Study.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>developments.</p> <p>We welcome the preferred approach's requirement for major new developments to make a financial contribution towards on- or off-site biodiversity projects.</p> <p>Natural England have produced an information leaflet on green infrastructure, available online.</p>	
English Heritage	CSPO435	Core Policy 9	<p>Objects to the policy on the basis that it should also include reference to the historic environment. The Green Infrastructure Study does not currently appear to include reference to the historic environment. Cites Shrewsbury and Atcham Green Infrastructure Strategy as a good example.</p>	<p>Noted. The Green Infrastructure Study will cover the historic environment. Clarify this in the Submission Core Strategy.</p>
Worcestershire County Council	CSPO272	Core Policy 9	<p>It is unclear how green infrastructure will "act as a central focus for the District's regeneration" as mentioned in the first paragraph.</p> <p>It is unclear what is meant by site specific designations in paragraph three of the policy wording; we assume this relates to site-specific proposals for greenspace.</p> <p>The Core Policy should include reference to safeguarding the historic environment</p>	<p>Noted. Further detail will be set out within the Submission Document.</p> <p>Clarify the meaning of site specific designations within the Submission Core Strategy.</p> <p>Refer to safeguarding the historic environment within the Submission Core Strategy.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>as well as biodiversity etc.</p> <p>The policy wording should include reference to the proposed SPD on Landscape Character and the need for green space provision and biodiversity projects to be appropriate within the landscape character context.</p> <p>Core Policy 9 should include, alongside existing references to biodiversity, geodiversity and green infrastructure, a specific reference to landscape character in the list of developer contributions given in the indicative guide: "Biodiversity, geodiversity, landscape character and green infrastructure."</p>	
British Waterways	CSPO259	Core Policy 9	BW would wish to ensure that proposals under Core Policy 9 do not sterilise canal side land and that a distinction is made between rivers and associated floodplains as a natural feature and canals as an engineered structure. BW would welcome the opportunity to assist in the production of the Green Space Plan.	Noted. BW will be consulted on the production of the Green Infrastructure Study.
Herefordshire & Worcestershire Earth Heritage Trust	CSPO142	Core Policy 9	<p>Supports the policy.</p> <p>Questions whether it is possible for new developments to make a contribution to on or off-site geodiversity as well. This links</p>	<p>Noted. This will be considered during the development of the Submission Core Strategy.</p> <p>Comment relating to Rivers Severn and</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			to Geodiversity Action Plan target. Alternatively, include the following sentence: "Where appropriate on new development sites, geodiversity features and assets will be created and/or enhanced." Rivers Severn and Stour are important as natural features as well as for wildlife and this should be highlighted in the text.	Stour is noted and agreed.
Kidderminster Civic Society	CSPO497	Core Policy 9	Again we would be keen to see provision of new Greenspaces whilst protecting existing ones and protecting the River Stour and other watercourses. NB I cannot see reference made to the Sustainable Communities Act - should not this be referred to.	Noted. However, the Core Strategy should not repeat national policy.
Worcestershire Biodiversity Partnership	CSPO76	Core Policy 9	Core Policy 9 contains no mention of how SSSI and SWS protection will be covered.	Noted. Ensure that this is included within the policy wording for the Submission Core Strategy.
The Inland Waterways Association	CSPO166	Core Policy 9	Highlights the biodiversity value of the Staffs and Worcs Canal and argues that it should be included by name within the para referring to the biodiversity value of the Rivers' Severn and Stour.	Noted. Include the Staffs and Worcs Canal within the para on the biodiversity value of the Rivers' Severn and Stour.
Worcestershire Wildlife Trust	CSPO107	Core Policy 9	Strongly supports the policy and accompanying paragraphs in section 18.	Support is welcome.
Kidderminster Property Investments	CSPO300	Core Policy 9	The policy objective for delivering green infrastructure and supporting local biodiversity is supported. At Churchfields	Support is noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			North it is considered that regeneration of the site can deliver an enhancement of the waterside environment.	
British Sugar Plc	CSPO402	Core Policy 9	Supports the approach to Green Infrastructure and biodiversity. Promotes the development of a site at Wilden Lane which would enhance public access to Wilden marsh and meadows SSSI.	Support is noted.
Country Land & Business Association	CSPO443	Core Policy 9	The core strategy must recognise and encourage the important role of land managers in enhancing and maintaining biodiversity.	Noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Worcestershire County Council	CSPO273	19. Promoting Community Wellbeing	It should be noted that the perceived conflict between securing contributions for education provision and delivering affordable housing in paragraph is already recognised within the policy framework for calculating these contributions. Affordable housing is excluded from this requirement.	Noted.
Worcestershire Primary Care Trust	CSPO550	19. Promoting Community Wellbeing Para 19.5	Supports the emphasis on walking/cycling networks and home zones for new residential development. Active transport promotes physical and mental wellbeing and has a role in reducing obesity and a range of other diseases.	Support is welcomed.
The Theatres Trust	CSPO284	19. Promoting Community Wellbeing	Welcome the inclusion of cultural facilities but the document does not define what is included within 'community facilities'. Suggests rewording para 19.1 as follows: 'This includes services and social infrastructure to meet the needs of the population <i>as met by community facilities</i> including health,'	Support is noted. Include a more detailed definition of community facilities within the submission document.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Mr R H Blakeway	CSPO83	19. Promoting Community Wellbeing	Surprised that no reference is made to the proposals for significant changes in the provision of schooling for the District over the coming years. Considers that the policy and text should be amended to incorporate support for the schools initiatives within the District. Reference should also be made to the need for suitable land to be allocated to accommodate the King Charles 1st School.	Noted. This is further considered through the Site Allocations and Policies Issues and Options Paper.
West Midlands Regional Assembly	CSPO413	Core Policy 10	Neither the published or emerging RSS addresses S.106 contributions. The policy therefore raises no conformity issues.	Noted.
Natural England	CSPO468	Core Policy 10	Welcomes the inclusion of 'environmental improvements' within the list of areas where developer contributions may be required. Green Infrastructure plays an important role in quality of life and wellbeing, and should be recognised.	Support is noted.
English Heritage	CSPO436	Core Policy 10	Objects to the indicative list of areas which require developer contributions. The list should include historic environment. Cites Dudley MBC as a good example to help inform the revised SPD.	Objection is noted. Consider including the historic environment within the list of contributions which may be required.
Worcestershire County Council	CSPO274	Core Policy 10	Supports Core Policy 10 which refers to developer contributions for educational	Support is noted.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>facilities.</p> <p>Policy should include provision to include the historic environment within social infrastructure provision.</p>	
West Mercia Constabulary Police HQ	CSPO335	Core Policy 10	<p>Supports the Council's view that new development must contribute towards sustainable communities and that infrastructure should be considered as part of major new development proposals. However, West Mercia Constabulary should be identified in the list of social infrastructure set out. Sets out planning and legal basis for the request. Funding policing is well within the parameters of planning obligations as community safety is a legitimate spatial planning obligation according to PPS1. This request is also made in the context of the Government's recently published '<i>National Community Safety Plan 2008-2011</i>', which is aimed at crime and disorder partnerships, of which WMC and Wyre Forest District Council are part.</p> <p>The Council can be assured that any contributions sought would only be used for the purposes of providing new physical infrastructure and other measures necessary to deliver the policing services</p>	Support is noted. Consider including policing in the list of infrastructure that is set out within Core Policy 10.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			required by new communities.	
British Waterways	CSPO260	Core Policy 10	BW supports this policy as it could assist in delivering the enhancement of the canal and the River Severn Navigation corridors.	Support is noted.
Kidderminster Civic Society	CSPO498	Core Policy 10	Protection of the town's remaining carpet heritage is vital. The idea of a Severn Valley Regional Heritage Park is to be encouraged. Also, public art needs promoting.	Support is noted.
The Theatres Trust	CSPO286	Core Policy 10	Support the inclusion of cultural facilities for developer contributions however, recommends that the Core Strategy includes a policy to show the overall approach to developer contributions with appropriate references to strategic sites and clear links to the revised SPD.	Support is noted. Core Policy 10 sets out the District Council's preferred approach to developer contributions. The SPD will be revised after the Core Strategy has been adopted.
Worcestershire Acute Hospitals NHS Trust	CSPO144	Core Policy 10	Worcestershire Acute Hospitals NHS Trust supports seeking developer contributions towards healthcare facilities	Noted. Health facilities are identified within Core Policy 10 as one of the areas where developer contributions may be required.
Campaign to Preserve Rural England	CSPO325	Core Policy 10	Need to ensure that community facilities are provided within new developments rather than contribution being made in lieu of actual provision.	Noted. The revised Planning Obligations SPD will set out more details on developer contributions.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Worcestershire Wildlife Trust	CSPO108	Core Policy 10.	We are pleased to support this policy and in particular the inclusion of biodiversity, geodiversity and green infrastructure in the list of areas requiring developer contributions.	Support is noted.
Sport England	CSPO16	Core Policy 10	<p>Existing community infrastructure should only be protected if there is a proven need for it.</p> <p>The first paragraph should be re-worded as follows: <i>...and the shared use of community and all educational facilities will be promoted</i>" to cover private and further educational facilities as well as state schools.</p> <p>New Developments should include: all residential - affordable, special & market housing; retail; commercial; industrial; and distribution.</p>	Noted. Re-word as suggested to ensure that all educational facilities are included.
Kidderminster Property Investments	CSPO301	Core Policy 10	Considers that it is important for negotiations to be undertaken on a site-by-site basis in relation to developer contributions. Whilst it is accepted that developer contributions are both necessary and reasonable in principle, they should not be excessive to undermine the deliverability or restrict the quality of regeneration.	Noted. The SHLAA will include viability testing on all of those sites which are considered to be potentially suitable for residential development. The results of this will be incorporated into the Submission document.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Shaylor Construction Ltd	CSPO121	Core Policy 10	Core Policy 10 does not contain reference to viability or schemes such as 100% affordable housing where contributions will not be required. Failure to make reference to viability means that this policy is considered to be unsound.	Noted. Viability assessments will be carried out on sites which are considered to be potentially suitable for residential development through the SHLAA. Further details will be set out within the Submission Core Strategy.
British Sugar Plc	CSPO403	Core Policy 10	Supports the policy approach. from a review of the PPG17 audit it is clear that the District Council will need to safeguard existing sports facilities and open space and identify additional provision. Promotes the development of a site at Wilden Lane which would potentially enable a net gain in open space or sports provision south of Kidderminster and would provide other social infrastructure through S.106 contributions.	Support is welcomed. The allocation of individual sites for particular uses will be considered through the Site Allocations and Policies DPD.
A R Price	CSPO405	Core Policy 10	Raises concern over the economic viability of the policy. Identifies health facilities as an area where it may not be appropriate for contributions to be made.	Concerns regarding economic viability are noted. The sites considered to be potentially suitable for residential development through the SHLAA will undergo economic viability testing and the results will be fed into the submission Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Natural England	CSPO469	20. Historic Environment, Culture and Tourism	<p>Welcomes the recognition of the importance of the waterways and the preferred approach's promotion of the canal network as a sustainable tourism destination, but recommends that other natural assets, such as Wyre Forest and Wilden Marshes are better promoted.</p> <p>SA conclusion that the development of outdoor recreation activities could have a detrimental impact on the landscape character and biodiversity is not necessarily true. Natural England would strongly support the development of leisure/outdoor activities focused around the District's natural assets, if sensitively delivered and in appropriate locations.</p> <p>The Green Infrastructure study should integrate the historic environment and help ensure features are preserved and enhanced by development.</p>	<p>Support is noted.</p> <p>Amend SA in light of this response.</p> <p>Ensure that the Green Infrastructure study integrates the historic environment.</p>
Worcestershire County Council	CSPO275	20. Historic Environment, Culture and Tourism Para 20.2	<p>Should include reference to the 923 other recorded historic assets as contained in the County Historic Environment Record.</p> <p>The Wyre Forest deserves special mention due to its historical importance.</p>	Noted. Include a reference to these within the submission document.
Worcestershire County Council	CSPO276	20. Historic Environment,	Within paragraph 20.15, please also refer to the Grow With Wyre project with respect	Noted. Refer to this within the historic environment, culture and tourism section

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		Culture and Tourism Para 20.15	for developing sustainable tourism.	of the submission document.
Worcestershire County Council	CSPO277	20. Historic Environment, Culture and Tourism Para 20.16	Promotes the importance of a high quality public transport network with high quality interchanges at both the bus and rail station which is considered to be vital for the economy and for tourism.	Noted.
Upper Arley Parish Council	CSPO267	20. Historic Environment, Culture and Tourism Para 20.16	Do not support the option to 'Restore navigation to the River Severn throughout the District' where this means restoration of navigation within the Parish of Arley.	Noted.
Bewdley Town Council	CSPO541	20. Historic Environment, Culture and Tourism Para 20.15	Bewdley has been badly affected over the last 10 years, many shops have closed, and this has reduced income from tourism. This disruption is likely to continue. Car- parking facilities and charges are not competitive compared to other centres.	Noted. This needs to be guided by Regional Policy.
British Waterways	CSPO261	20. Historic Environment, Culture and Tourism	BW is pleased to see the canal acknowledged as a key asset in the local visitor economy and tourism industry. There is much scope to capitalize on the progress already made in the light of the favourable exchange rate to home tourism.	Support is noted.
Herefordshire & Worcestershire Earth Heritage Trust	CSPO140	20. Historic Environment, Culture and Tourism	However, increased sustainable tourism (through such things as the Geopark Way), may increase the desire for better exposures/interpretation of geodiversity in	Noted. Reconsider the SA in light of these comments.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		Para 20.17	the District; thus having a positive benefit.	
The Theatres Trust	CSPO288	20. Historic Environment, Culture and Tourism	Supports the acknowledgement of the Rose Theatre in the document and the idea to develop a cultural quarter in Kidderminster.	Support is noted.
The Inland Waterways Association	CSPO154	20. Historic Environment, Culture and Tourism	20.16 - Given the need to provide a greater range of sustainable transport we welcome the Council's commitment to the restoration of navigation on the River Severn throughout the District, and also the promoting of the inland waterways network as a key visitor attraction.	Noted. However, the Option relating to the restoration of navigation to the River Severn throughout the District performed poorly against the SA framework and requires a great deal of further feasibility work before it could be delivered. As such, the option has not been included within the preferred approach to culture, heritage and tourism set out within the Preferred Options Paper.
Council for British Archaeology West Midlands	CSPO87	20. Historic Environment, Culture and Tourism Para 20.2	This text should include more detail on non-designated historic environment assets, such as the number of sites recorded in the Historic Environment Record. It should also mention Historic Landscape Characterisation.	Noted. Include greater detail on this in the submission document.
Campaign to Preserve Rural England	CSPO326	20. Historic Environment, Culture and Tourism Paras.20.2-20.7	Council needs to identify the areas which need to be conserved in more detailed Local Planning Documents, particularly in towns as there are no parish Plans. This is likely to include areas of good quality inter-war and pre-WWI housing that needs to be protected.	Noted. The Site Allocations and Policies DPD will include details of all designated Conservation Areas within the District and look further at townscape character.
Sport England	CSPO17	20. Historic Environment,	We would suggest a rewording of the 3 rd bullet point to ideally develop a series of	The comment refers to an option which has not been progressed.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		Culture and Tourism	leisure/sports/outdoor activities.... This is because it is not always possible to access suitable natural venues by public transport e.g. areas for rock climbing or paragliding. Sport England believes it would be inappropriate to exclude sites for sporting use because of lack of public transport.	
West Midlands Safari Park	CSPO183	20. Historic Environment, Culture and Tourism	Sets out background information to the West Midlands Safari Park. and its role within the economy of the District. Promotes the development of a hotel and conference centre at the WMSLP to diversify the tourism base of the area.	Noted.
West Midlands Safari Park	CSPO191	20. Historic Environment, Culture and Tourism Para 20.15 - 20.18	<p>Para 20.15 notes that the tourist industry is valuable to the District's economy and identifies WMSLP as a key tourist destination. Raises concern that this is not recognised in any of the core policies and as such proposes an amendment to Core Policy 11.</p> <p>Fully supports that there is considerable scope to enhance the short stay holiday market within the District but raises concern that this is not reflected within a policy. Argues that Kidderminster is not the only location where new visitor accommodation should be considered</p>	Noted. Consider this when drafting the submission document. However, it will need to be considered in the context of the RSS which advocates Kidderminster as a Strategic Centre.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>acceptable. Also reference to budget accommodation is inappropriate, new accommodation should be delivered at a level which best meets the needs of the market.</p> <p>Refers to chapter 5 of DCLG Good Practice Guide for Tourism. Argues that the development of a hotel in close proximity to an existing tourist facility such as the WMSLP accords with this policy.</p> <p>Refers to Annex A of the Guide, which states that the recognition of the market which a particular hotel is intended to serve may influence the choice of location and may mean that the preferred site should not be in a town centre. Argues that this is an important consideration.</p> <p>Argues that it is more sustainable to provide a hotel next to a tourism destination and that the Core Strategy should make reference to the delivery of new visitor accommodation at the WMSLP.</p>	
Shaylor Construction Ltd	CSPO122	20. Historic Environment, Culture and Tourism	Positive approach to the regeneration of historic areas should be to conserve and safeguard the previous industrial legacy but to encourage development to embrace	Noted. Local distinctiveness is a key consideration within the Core Strategy. It is considered to be important to retain previous industrial buildings of

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		Para 20.4	the architecture and existing buildings. New development should incorporate the existing historic elements in accordance with PPG15.	architectural merit, as well as encouraging new developments to embrace the architecture of existing buildings, in order to enhance local distinctiveness.
Shaylor Construction Ltd	CSPO123	20. Historic Environment, Culture and Tourism Para 20.16	Supports reference to the growing tourism industry within the District and the need to provide further hotel facilities within Kidderminster. Argues that the locations for such a hotel use should be focussed within close proximity to Weavers Wharf and public transport links. Promotes the Brinton's offices on Exchange Street for tourism and leisure and a small scale hotel as part of a mixed use residential scheme.	Noted. The Core Strategy supports the development of further hotel facilities within Kidderminster Town Centre. Individual sites will be given further consideration through the Kidderminster Central Area Action Plan DPD.
Mr David Morgan	CSPO15	20. Historic Environment, Culture and Tourism Para 20.17	Concerned that the SA summary does not refer to the negative impacts of the restoration of the Severn navigation.	Noted. The option referred to is relevant to both the "Historic Environment, Culture and Tourism" and "Delivering Sustainable Development Standards". The impacts are considered more fully in both paragraphs 6.33 and 6.42, and Tables A.18 and A.30 of the accompanying Draft Full SA Report.
Mr David Morgan	CSPO14	20. Historic Environment, Culture and Tourism	Concerned that the document is weak on footpaths and makes reference to two examples within Bewdley.	Noted. However, the Core Strategy is a strategic document and as such is not site specific. The strategy sets out policy to enhance walking and cycling. Footpaths are also an important element of green infrastructure provision.
Mr Kim Balls	CSPO137	20. Historic	Consideration should be given to fostering	Noted. This will be given further

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		Environment, Culture and Tourism	a degree of heritage led development, especially in areas where there may be higher levels of deprivation. Development areas that respond to particular character/historic areas, can help to enhance community wellbeing and led to reduced social exclusion.	consideration during the development of the submission document.
West Midlands Regional Assembly	CSPO414	Core Policy 11 Penultimate paragraph	Core Policy 11 generally accords with policies QE6 and PA10 of the published WMRSS.	Support is noted.
English Heritage	CSPO437	Core Policy 11	<p>Welcome and support the prominence given to the historic environment in the first stage of Core Policy 11.</p> <p>In conjunction with conservation area appraisals other data sets should be used to inform the location and design of new development, such as the County Council's Historic Environment Record, local lists and Historic Landscape Characterisation. These should also inform the proposed revision of the Design SPD and Landscape Character SPD.</p> <p>Archaeological considerations must also be covered in the policy, particularly in the context of the District's industrial heritage, and the archaeology associated with the River Severn and Wyre Forest. Similarly the District's wealth of designed</p>	<p>Support for Core Policy 11 section one is noted.</p> <p>Noted these resources will be considered within the LDF and when determining individual planning applications.</p> <p>Include archaeological considerations within Core Policy 11.</p> <p>Refer to EH guidance when drafting the submission Core Strategy.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>landscapes (p89) should also be covered.</p> <p>Suggests referring to EH guidance on Core Strategies.</p> <p>Identifies reservations with the remaining elements of the policy. Aspects such as promoting cultural facilities and public art would be better dealt with under Core Policy 10 and providing for sustainable communities. Similarly, the proposed policy areas dealing with tourist accommodation facilities and tourism facilities would be better dealt with under Core Policies 2 and 4.</p>	
Worcestershire County Council	CSPO278	Core Policy 11 - Penultimate paragraph	Para one should include reference to preserving, managing and enhancing the District's historic environment through the development control process as well as Conservation Area Appraisals as most historic assets lie outside of conservation areas.	Noted. Consider including this within the Submission document.
Herefordshire & Worcestershire Earth Heritage Trust	CSPO141	Core Policy 11	Support	Support is welcomed.
The Theatres Trust	CSPO290	Core Policy 11	Support Core Policy 11. The trust particularly asks that the Core Strategy provides sufficient protection to ensure continued theatre use in other venues within the District, particularly where these	Support for the policy is noted. Ensure the policy wording within the submission document safeguards all performing arts space.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			buildings are not listed or within Conservation Areas or may be affected by redevelopment - this should include performing arts facilities that stand alone, are part of other facilities, or are contained within educational or community buildings.	
The Inland Waterways Association (Birmingham, Black Country & Worcestershire Branch)	CSPO167	Core Policy 11 - Penultimate paragraph	Welcome the proposal to develop the Severn Valley Regional Heritage Park through the Landscape Character SPD but consider, given the increasing demand for sustainable transport, that this statement should be widened to include the Council's commitment to restore navigation on the River Severn (we assume that the SPD will cover this but consider that, in view of current thinking, this needs to be given a greater profile in the policy itself.	Support is noted. However, The District Council has not set out a commitment to restore navigation to the River Severn throughout the District. The option relating to the restoration of navigation to the River Severn throughout the District performed poorly against the SA framework and requires a great deal of further feasibility work before it could be delivered. As such, the option has not been included within the preferred approach to culture, heritage and tourism set out within the Preferred Options Paper.
Council for British Archaeology West Midlands	CSPO88	Core Policy 11	<p>Introduction must make it clear that it relates to other core policy areas. Historic environment should have its own core policy area.</p> <p>Only part of the District's environment is covered by conservation areas, therefore, Conservation Area Appraisals will not preserve and enhance the District's historic environment, need to make this</p>	<p>Noted. Include clearer links between all related core policy areas within the submission document.</p> <p>Amend text to ensure that all other historic environment features are fully recognised within the submission document.</p> <p>Reference the Historic landscape</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			clear. The policy must make reference to Historic Landscape Characterisation.	Characterisation within the submission document.
Worcestershire Wildlife Trust	CSPO109	Core Policy 11	We would suggest that a comment regarding the need to balance support for tourism with biodiversity protection and enhancement be included here (or perhaps in the supporting wording), particularly in relation to increased use of the canal corridor.	Noted. Include such a statement within the submission document.
Bovale Limited	CSPO24	Core Policy 11 Penultimate paragraph	Considers that additional locations to those located within the KCAAP should be considered to accommodate budget hotel accommodation. Suggests a site off Stourport Road, Bewdley.	The allocation of individual sites for specific types of development is to be considered through the Site Allocations and Policies DPD.
Bovale Limited	CSPO25	Core Policy 11 Final paragraph	Support for a proactive approach to supporting development in association with sustainable tourism.	Noted. Support is welcomed.
West Midlands Safari Park	CSPO192	Core Policy 11 Penultimate paragraph	This policy fails to provide any guidance on the development of the District's major tourist facilities despite a number of references in the plan to the importance of tourism to the District. The policy should encourage the expansion and diversification of the District's tourist facilities provided that their development is environmentally acceptable.	Noted. This will be considered in the development of the submission document. However, tourism must be sustainable and not just environmentally acceptable. This is particularly applicable to a major trip generator such as WMSLP.
Kidderminster Property Investments	CSPO302	Core Policy 11	Provision of public art needs to be considered in terms of viability for each development proposal.	Noted.
Shaylor Construction	CSPO124	Core Policy 11	Supports reference to the growing tourism	Noted. The Core Strategy supports the

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Ltd			industry within the District and the need to provide further hotel facilities within Kidderminster. Argues that the locations for such a hotel use should be focussed within close proximity to Weavers Wharf and public transport links. Promotes the Brinton's offices on Exchange Street for tourism and leisure and a small scale hotel as part of a mixed use residential scheme.	development of further hotel facilities within Kidderminster Town Centre. Individual sites will be given further consideration through the Kidderminster Central Area Action Plan DPD.
Country Land & Business Association	CSPO444	Core Policy 11	Recommend that policy states unequivocally that economically-effective uses and the properly considered changes needed to achieve them are essential and beneficial if heritage is to survive in the long-term. CLA would like to see a positive flexible approach to the historic environment.	Noted. Consider including this wording within the policy.
Mr David Morgan	CSPO13	Core Policy 11	Concerned that the strategy is weak on tourism and does not highlight the need for specific facilities.	Noted. However, the role of the Core Strategy is to provide strategic planning policy for the District. Site specific issues will be considered through the Site Allocations and Policies DPD.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Government Office for the West Midlands	CSPO208	21. Monitoring and Implementation Framework - Proposed Monitoring Indicators	Notes the outline implementation and monitoring framework and identifies that this will need to be fully developed for submission. Emphasises the importance of continued engagement with key stakeholders during the preparation of the submission document.	Noted. The implementation and monitoring section will be fully developed for the submission document. The District Council will continue to engage key stakeholders in the production of the submission Core Strategy.
Natural England	CSPO470	21. Monitoring and Implementation Framework - Proposed Monitoring Indicators	<p>Recommend that 'local distinctiveness' and 'regeneration' are considered separately. Proposed indicators monitor redevelopment of brownfield land, not delivery of local distinctiveness. Redevelopment of brownfield land may hamper local distinctiveness. Local distinctiveness is a product of good design and development which is in keeping with and enhances its local environment. The green Infrastructure Study, proposed Landscape Character SPD and the preferred approach to sustainable development standards should be used as a basis for developing indicators around local distinctiveness.</p> <p>Suggests additional transport indicator around distance to public</p>	Noted. The delivery of regeneration on brownfield sites within the urban area is key to the achievement of the spatial strategy. This needs to be carefully balanced with local distinctiveness. Develop a separate indicator around local distinctiveness and an additional transport indicator as suggested.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			transport links and the quality of pedestrian and cycle links to key facilities.	
English Heritage	CSPO438	21. Monitoring and Implementation Framework – Proposed Monitoring Indicators	<p>Suggests the indicator on conservation area appraisals should refer to the number of conservation areas with up-to-date appraisal and published management plan. Other indicators could include:</p> <p>the number of conservation areas at risk;</p> <p>The completion of urban design frameworks/design briefs/masterplans for key development sites;</p> <p>Improvements in the management of historic and archaeological sites and features;</p> <p>% of local authority area covered by historic landscape / urban characterisation studies.</p> <p>'Determination of applications for major new housing in accordance with Building for Life criteria'.</p>	Noted. Consider revising conservation area indicator and including further indicators.
Worcestershire County Council	CSPO279	21. Monitoring and Implementation Framework –	Questions whether the most appropriate indicators have been selected, particularly in relation to 'Delivering Sustainable Development	Comments are noted. Suggested indicators will be considered during the development of the monitoring

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		Proposed Monitoring Indicators	<p>Standards' and Addressing flood risk through future development'. Suggests considering the State of the Environment indicators.</p> <p>In relation to green infrastructure, the wider context should be considered and indicators should consider the additional HA created on brownfield sites, linear coverage, number of species enhanced, number of street trees planted, number of green roofs created. Suggests the following:</p> <ol style="list-style-type: none"> 1. New area (m²) of designated GI network created per hectare of new development; AND, 2. Number of new Local Nature Reserves and Special Wildlife Sites designated. <p>Delivering sustainable development should include buildings built to BREEAM standards (at what level) and houses built to Code for Sustainable Homes and what level especially if ahead of national requirements.</p>	framework for the Submission Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Suggests that the indicator for rural development and countryside protection should be more positive in terms of the way it assesses protection and enhancement of the countryside. For example number of applications in the Countryside which are determined using the Worcestershire County Council Landscape Character Assessment web tool, or again we would direct to the State of the Environment Indicators.	
Herefordshire & Worcestershire Earth Heritage Trust	CSPO143	21. Monitoring and Implementation Framework - Proposed Monitoring Indicators	Suggests replacing 'number of new nature reserves designated' with the number of nature reserves and Local Sites (wildlife and geological), that are in good condition and are being actively managed. This links to NI197.	Noted. Amend this indicator as suggested.
Worcestershire Biodiversity Partnership	CSPO79	21. Monitoring and Implementation Framework - Proposed Monitoring Indicators	Suggests an additional indicator for green infrastructure based on semi-natural habitat created or enhanced through the development process.	Noted. Consider including an indicator based around this.
West Midlands Region RSL Planning Consortium	CSPO44	21. Monitoring and	Recommend that two further indicators be added to "Delivering	Support is welcomed. Consider adding housing mix as an

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		Implementation Framework - Proposed Monitoring Indicators	Housing Choice." Should include reference to supporting the range of elderly person's needs. Housing mix should also be monitored.	indicator.
Worcestershire Wildlife Trust	CSPO110	21. Monitoring and Implementation Framework - Proposed Monitoring Indicators	Current biodiversity indicator not considered appropriate. Suggests the following alternatives: Number of applications contributing to GI the number of applications directly creating or enhancing GI features the number of applications including GI in SuDS and the built environment.	Noted. Retain existing indicator and supplement with at least one of the suggested alternatives.
Wyre Forest District Council	CSPO358	21. Monitoring and Implementation Framework - Proposed Monitoring Indicators	Proposed monitoring indicators (p74) - no mention of monitoring carbon emissions, energy efficiency of new developments etc. Could be included in line with NI186 per capita CO2 emissions in the LA area.	Consider including an indicator in line with NI186 per capita CO2 emissions in the LA area.
Worcestershire County Council	CSPO280	21. Monitoring and Implementation Framework – Draft Implementation Plan	Would like to see a strategic evaluation of brownfield sites within the District, including any potential development constraints with regards to flood risk and biodiversity. Recognises that although brownfield land will be	Biodiversity value of brownfield sites will be considered through the SHLAA process. Appropriate mitigation measures will be considered on a site-by-site basis, however, amendments to Core policies

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>required for development, some areas might be suitable for flood storage, amenity and biodiversity.</p> <p>Highlights the importance of safeguarding brownfield biodiversity. Should encourage developers to undertake pre-development ecological surveys to ensure that brownfield development does not adversely impact biodiversity. Suggests mitigation measures such as green walls, green or brown roofs, soft-landscaping etc where impact is unavoidable. These measures will also help to deliver sustainable development standards.</p>	<p>relating to biodiversity and sustainable development standards will need to be considered to facilitate this.</p>

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Government Office for the West Midlands - Planning Team	CSPO198	Appendix A: Evidence Base	Summary of evidence base is helpful. Consultation responses will also form part of this.	Support is welcomed. Add consultation responses to the list of evidence base documents.
Advantage West Midlands	CSPO472	Appendix A: Evidence Base	Highlights previous AWM work on urban-rural interdependence within the West Midlands. This assesses the relationship between Kidderminster and Bewdley. Out-commuting was identified as an issue within Bewdley. Initiatives to address local employment are important to address quality of life issues. The rural evidence base also looks at the factors which contribute to quality of life within rural areas. This traffic light table can be used to assess the direction of growth within market town and villages for example, with links to many of the spatial objectives set out in the Preferred Options. This database is available to view on line	Noted. Follow-up links and use information to help shape the policies within the Submission Core Strategy.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Worcestershire County Council	CSPO281	Appendix A: Evidence Base	<p>Note that Worcestershire County Council are expected to contribute to a number of documents - would welcome early clarification as to what this involvement is expected to entail.</p> <p>Requests including <i>Scoping Report of Historic Environment Assets</i> and the proposed <i>Historic Environment Assessment</i> from the County Council Historic Environment Service. The historic environment and archaeology section would like to discuss this with the District a.s.a.p as it feeds into a number of policies.</p>	<p>Noted. Studies set out within Appendix A are currently on-going.</p> <p>Include <i>Scoping Report of Historic Environment Assets</i> and the proposed <i>Historic Environment Assessment</i> from the County Council Historic Environment Service as part of the evidence base. Set-up a meeting with WCC officers to discuss this further.</p>
Herefordshire & Worcestershire Earth Heritage Trust	CSPO145	Appendix A: Evidence Base	Should the Geodiversity Action Plan be added to the list?	Noted. Add the geodiversity action plan to the list of evidence base documents.
West Midlands Region RSL Planning Consortium	CSPO45	Appendix A: Evidence Base	The date for publication of the SHLAA is incorrect and should be publicised prior to the next round of consultation.	Noted. The SHLAA will be published in late April.
Council for British Archaeology West Midlands	CSPO89	Appendix A: Evidence Base	This table needs to include Historic Landscape Characterisation	Noted. Include this within the evidence base.
Sport England	CSPO18	Appendix A: Evidence Base	<p>Suggest including the following as part of the evidence base:</p> <p>Active People Survey - the largest ever survey of sport and active recreation ever undertaken in Europe.</p>	Noted. Data from these sources has been incorporated into the evidence base via the PPG17 audit. The regional Plan for Sport has also been scoped within the Sustainability Appraisal process.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Active Places database - allows you to search for different sports facilities within England in a number of ways. The Regional Plan for Sport.	

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Environment Agency	CSPO540	Appendix B - Key Characteristics	<p>Key characteristics</p> <p>Flooding - reference should be made to the Level 2 SFRA produced by Royal Haskoning</p>	Noted. The submission document will draw on the SFRA2.
Worcestershire County Council	CSPO282	Appendix B - Key Characteristics	<p>Please note it is generally accepted practice to report scientific names of species in bracketed italicised Latin, capitalising the genus name: e.g. "greater pond sedge (<i>Carex riparia</i>)". There are some inconsistencies within the formatting of these paragraphs.</p> <p>Finally, it should be noted that the descriptors here appear limited to key district habitats: wetland/marsh/heathland/acid grasslands. We would encourage the broader recognition of the District's BAP habitats both for their value for protected species and the District's wider wildlife as well as the value these habitats have in their own</p>	Noted. The information provided within this section serves as background to the development of the document and will not be included within the submission document in this format. However, this will be considered in the development of relevant core policy areas.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			right.	
Herefordshire & Worcestershire Earth Heritage Trust	CSP0146	Appendix B - Key Characteristics	Should there be geodiversity data included in this?	Noted. The information provided within this section serves as background to the development of the document and will not be included within the submission document in this format. However, this will be considered in the development of relevant core policy areas.
Herefordshire & Worcestershire Earth Heritage Trust	CSP0147	Appendix B - Key Characteristics	Should there be some geodiversity data included in the environment section?	Noted. The information provided within this section serves as background to the development of the document and will not be included within the submission document in this format. However, this will be considered in the development of relevant core policy areas.
Council for British Archaeology West Midlands	CSP090	Appendix B - Key Characteristics	This needs to make it clear that the historic environment also includes many non-designated sites. There are many additional assets recorded in the Historic Environment Record.	Noted. The information provided within this section serves as background to the development of the document and will not be included within the submission document in this format. However, this will be considered in the development of relevant core policy areas.
Council for British Archaeology West Midlands	CSP091	Appendix B - Key Characteristics	This needs to make it clear that the historic environment also includes many non-designated sites. There are many additional assets recorded in the Historic Environment Record.	Noted. The information provided within this section serves as background to the development of the document and will not be included within the submission document in this format. However, this will be considered in the development of relevant core policy areas.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Oldington & Foley Park Pathfinder	CSPO547	Appendix B - Key Characteristics	Core Options page 102 key characteristics - I think the colour code for education map is wrong as certainly yellow and brown needs to be switched.	Noted.
Wyre Forest District Council	CSPO360	Appendix B - Key Characteristics	Key characteristics Appendix B- carbon emissions map and figures by sector?	Noted. The information provided within this section serves as background to the development of the document and will not be included within the submission document in this format. However, this will be considered in the development of relevant core policy areas.
Wyre Forest District Council	CSPO346	Appendix B - Key Characteristics	Table to make comparisons with Worcestershire /West Midlands/England averages?	Noted. The information provided within this section serves as background to the development of the document and will not be included within the submission document in this format. However, this will be considered in the development of relevant core policy areas.

Appendix 2: Summary of Responses received to the Core Strategy Preferred Options Consultation Paper

Organisation/Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
The Inland Waterways Association	CSPO168	Jargon Guide	Suggests that a definition of Scheduled Ancient Monuments are included for clarity.	Noted. Include Scheduled Ancient Monuments within the Jargon Guide.

Appendix 2: Summary of Responses received to the Core Strategy Draft Sustainability Appraisal Report

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
Natural England	CSDSA38	General Comments	Thanks WFDC for consulting Natural England and sets out some background information on their role. Supports the findings of the SA and its clear role in influencing the development of the preferred options.	Noted. Support is welcomed.
A R Price	CSDSA29	General Comments	Notes approach which is deemed appropriate but reserves the right to make further comment once the interpretation of the assessment is more clearly defined within the submission document and the RSS2 figures have been properly defined.	Support is welcomed. There will be a further opportunity to comment during the publication stage.
Mr Kim Balls	CSDSA6	3. Background Para 3.9	Identifies that "Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks" (ODPM, 2005) is no longer recommended guidance for SAs.	Noted. Revised guidance is expected to be published shortly.
Worcestershire County Council	CSDSA51	4. Appraisal Methodology - The SA Process	Concerns over the important and sometimes deep archaeological deposits within Brownfield sites in Kidderminster. Considers that this should be included within the Sustainability Appraisal and require appropriate mitigation through the planning process	Noted. Re-consider the options testing in light of these comments.
Natural England	CSDSA39	The SA Framework	Approves SA framework as a sound basis for assessing proposals.	Support is welcomed.
Natural England	CSDSA40	The SA Framework	Delivery of green infrastructure could be used as an indicator for improved health and well-being particularly relevant to SA	Noted. Amend the indicators to include these suggestions.

Appendix 2: Summary of Responses received to the Core Strategy Draft Sustainability Appraisal Report

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>objectives 1, 2 and 4.</p> <p>Green infrastructure should also be included as an indicator under objectives 11,12,13,14 and 16 and will play a role in delivering objective 15.</p> <p>Objectives 1, 4 and 14 should include indicators around the delivery of quality open space, possibly hinging around ANGSt targets and Green Flag awards.</p>	
Natural England	CSDSA41	The SA Framework	<p>Objective 3 should include decision-making criteria related to sustainable homes. Suggests the following:</p> <p>The number of homes exceeding minimum Code for Sustainable Homes Standards;</p> <p>Delivery of recycling and composting facilities at community or individual home level;</p> <p>The number of developments including secure bike storage facilities;</p> <p>The number of homes designed with future climates in mind;</p> <p>Delivery of green infrastructure;</p> <p>Developments including SuDS.</p>	Include additional indicators under objective 3 as suggested.
Natural England	CSDSA42	The SA Framework	Decision-making criteria under SA objective 7 are not fully covered by indicators. Suggest including something on the achievement of Code for	Noted. Include an additional indicator as suggested.

Appendix 2: Summary of Responses received to the Core Strategy Draft Sustainability Appraisal Report

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Sustainable Homes levels or energy ratings.	
Natural England	CSDSA43	The SA Framework	Distance to public transport links should be considered as a part of SA Objective 8 question 2.	Noted, revise decision-making criteria to include this.
Natural England	CSDSA44	The SA Framework	Recommend an indicator around the number of developments using SUDS under objective 9 as SUDS can protect water quality and provide opportunities for water recycling. Welcome the inclusion of indicators around the inclusion of water efficiency measures and use of water meters, given the over abstraction issues in the District.	Noted. Support is welcomed. Include an additional indicator as recommended.
Natural England	CSDSA45	The SA Framework	Indicators under objective 11 should be positively framed and applications which enhance local character should be captured. Recommend the inclusion of an indicator around the Code for Sustainable Homes and BREEAM under decision-making criteria one.	Noted. Consider making changes to the indicators, however, data needs to be collectable.
Natural England	CSDSA46	The SA Framework	Welcome objective 12. Indicators under decision-making criteria 2 should be expanded to include the condition of local sites in line with NI197. Include an indicator to capture habitat creation and incorporation of features for species. Recommends reference to Biodiversity by Design for further information on delivering	Support is welcomed. Consider changing indicators as suggested.

Appendix 2: Summary of Responses received to the Core Strategy Draft Sustainability Appraisal Report

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			<p>biodiversity enhancement through development.</p> <p>Objective 16 - indicators should be expanded to incorporate aspects of climate change other than flooding such as orientation, passive ventilation and provision of shade.</p>	
English Heritage	CSDSA37	The SA Framework	<p>Supports the SA framework and acknowledges that objectives 11 and 13 reflect English Heritage advice and guidance.</p> <p>Objective 13 - decision-making criteria - question whether the third criterion would be better located under objective 11 and combined with the first criterion under that objective.</p>	<p>Noted. Support is welcomed.</p> <p>Noted. Amend the decision-making criteria to incorporate these comments.</p>
Herefordshire & Worcestershire Earth Heritage Trust	CSDSA13	The SA Framework	<p>Welcome SA objective 12.</p> <p>Objective 12.2 and 12.3 - additional indicator should be the condition of Local Sites (SWS and RIGS). This relates to NI197.</p>	Noted. Include additional monitoring indicators.
Council for British Archaeology West Midlands	CSDSA5	5. Sustainability Objectives, Baseline and Context Para 5.14	This must mention other archaeological remains as well as those designated as Scheduled Ancient Monuments	Noted. Include reference to other archaeological remains within the Final SA Report.
British Waterways	CSDSA3	6. Plan Issues	Raises concern that the SFRA2 study	Noted. The SFRA will influence the

Appendix 2: Summary of Responses received to the Core Strategy Draft Sustainability Appraisal Report

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
		and Options Para 6.35	<p>does not include the impact of BW canals. Recommend that the allocation of development is not limited in any way by this study.</p> <p>Supports the protection and enhancement of biodiversity and are keen to ensure that developments near the water enhance and protect the environment.</p> <p>Raises issues that 'Planning for Water in Worcestershire' omitted discussions with BW.</p>	<p>allocation of sites by identifying those areas at risk from flooding.</p> <p>Noted - the protection and enhancement of biodiversity will be an important consideration for sites adjacent to waterways.</p>
British Waterways	CSDSA7	6. Plan Issues and Options Para 6.33	Would wish to see the use of canal water for heating and cooling tested against the SA Framework. Submitted a study undertaken by Huddersfield University as background information. BW wishes to engage in discussion with WFDC regarding this matter.	Noted. The option was tested against the SA framework in Table A.18. The testing will be given further consideration in light of the study received.
Natural England	CSDSA47	6. Plan Issues and Options DS01	DS01 - assumption that greenfield and greenbelt land has a higher landscape and biodiversity value than brownfield land may not always be true. Advocates an evidence led consideration of quality of areas being considered for development.	It is noted that brownfield sites can sometimes be of greater landscape and biodiversity value than greenfield sites, therefore, the SHLAA and site allocations DPDs will look at the value of individual sites in greater detail before selecting the final sites for allocation.
Natural England	CSDSA48	6. Plan Issues and Options Core Policy 5	Question the SA finding that providing park and ride facilities would only move problems rather than resolve them. They	Noted. Reconsider the options testing for this area. A Park and Ride to the east of Kidderminster would increase car travel

Appendix 2: Summary of Responses received to the Core Strategy Draft Sustainability Appraisal Report

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			would reduce the amount of cars in town centres, reducing congestion, air pollution and carbon emissions. Value of delivering park and ride facilities directed towards tourist destinations eg, Safari Park from Kidderminster should be reassessed. Park and ride may be more appealing than local buses and more affordable than rail.	through Kidderminster especially from the east of the District.
Natural England	CSDSA49	7. Plan Policies - Mitigation Measures	Welcomes the recognition of potential biodiversity value of brownfield land and the mitigation measures proposed. Welcomes site-by-site approach to resolving potential conflict between renewable energy generation and landscape considerations. Regarding the need to light greenspace, potential impacts on biodiversity would need to be considered.	Noted. Support is welcomed. Amend table 7.2 accordingly.
The Theatres Trust	CSDSA8	7. Plan Policies Para 7.24: Core Policy 11	Sets out background information on The Theatres Trust. Para 7.24:Provision of cultural facilities is mentioned for the villages but not for the town centres - it is equally important for both. Promotes the concentration of tourism development within the town centres to support wider regeneration and sustainable development objectives such as reducing the need to travel by private	Noted. This will be considered through Core Policy 11 within the Core Strategy Development Plan Document and associated SA work.

Appendix 2: Summary of Responses received to the Core Strategy Draft Sustainability Appraisal Report

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			car and improving the built environment. Also be appropriate for the villages to provide entertainment, leisure and cultural facilities of an appropriate scale and kind to serve their roles and catchments. Policies should therefore cover both these options.	
The Theatres Trust	CSDSA9	7. Plan Policies Para 7.24: Core Policy 11	Concern that the promotion of a cultural quarter for Kidderminster is mentioned within the Core Strategy and associated SA work but not mentioned within the KCAAP DPD itself.	Noted. This will need to be identified within future drafts of the KCAAP DPD.
Natural England	CSDSA50	8. Implementation Monitoring Indicators	<p>Would welcome amendments to this section in line with suggested changes to the SA framework.</p> <p>SA would be complemented by the use of existing sustainability frameworks such as the Regional Sustainable Development Framework and the West Midlands Sustainability Checklist. The Sustainability Checklist in particular would aid monitoring. This would be invaluable in judging a development's performance and thus aid reporting on sustainability. Consideration should also be given to the type of information which needs to come in with an application in order to facilitate monitoring. If the required information on sustainability cannot be presented in the</p>	<p>Noted. Where changes are made to the indicators within the SA framework, this section will be amended as appropriate.</p> <p>Further consideration will need to be given to the use of the RSDF and West Midlands Sustainability Checklist as well as the information required from planning applications through both the Core Strategy Monitoring and Implementation framework and the SA.</p>

Appendix 2: Summary of Responses received to the Core Strategy Draft Sustainability Appraisal Report

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			Design and Access Statement an additional information requirement may be needed, for example, some form of 'Sustainability Statement' drawing on the West Midlands Sustainability Checklist may have to be required.	
Herefordshire & Worcestershire Earth Heritage Trust	CSDSA14	Appendix A: Table A.4	Need consistency with regards to SA Objective 12 - will the impacts be just on biodiversity, or biodiversity and geodiversity, or just geodiversity?	Noted. The objective considers impacts on both biodiversity and geodiversity. Review testing to ensure that both are fully considered.
Herefordshire & Worcestershire Earth Heritage Trust	CSDSA15	Appendix A: Table A.5	Need consistency with regards to SA Objective 12 - will the impacts be just on biodiversity, or biodiversity and geodiversity, or just geodiversity?	Noted. The objective considers impacts on both biodiversity and geodiversity. Review testing to ensure that both are fully considered.
Herefordshire & Worcestershire Earth Heritage Trust	CSDSA16	Appendix A: Table A.6	Need consistency with regards to SA Objective 12 - will the impacts be just on biodiversity, or biodiversity and geodiversity, or just geodiversity?	Noted. The objective considers impacts on both biodiversity and geodiversity. Review testing to ensure that both are fully considered.
Herefordshire & Worcestershire Earth Heritage Trust	CSDSA17	Appendix A: Table A.7	Need consistency with regards to SA Objective 12 - will the impacts be just on biodiversity, or biodiversity and geodiversity, or just geodiversity? There may be some instances where development within the urban areas may have little impact on biodiversity and an impact on geodiversity or vice versa.	Noted. Re-consider options testing in light of this comment.
English Heritage	CSDSA30	Appendix A: Table A.11	Table A11 is incomplete in its assessment of the options against objective 13 (historic environment). Options 2 and 3, both relating to Lea Castle, may have potential	Noted. Revise options testing to consider these impacts.

Appendix 2: Summary of Responses received to the Core Strategy Draft Sustainability Appraisal Report

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			impacts on surviving historic parkland and options five and six, (farm diversification) could have impacts on historic farmsteads.	
English Heritage	CSDSA31	Appendix A: Table A.12	The Sustainability Appraisal should indicate potential implications (positive and negative) for the historic environment (objective 13) in Table A.12 for all options.	Noted. Revisit this area of the options testing.
Herefordshire & Worcestershire Earth Heritage Trust	CSDSA18	Appendix A: Table A.12	Need consistency with regards to SA Objective 12 - will the impacts be just on biodiversity, or biodiversity and geodiversity, or just geodiversity?	Noted. The objective considers impacts on both biodiversity and geodiversity. Review testing to ensure that both are fully considered.
Herefordshire & Worcestershire Earth Heritage Trust	CSDSA19	Appendix A: Table A.13	Need consistency with regards to SA Objective 12 - will the impacts be just on biodiversity, or biodiversity and geodiversity, or just geodiversity?	Noted. The objective considers impacts on both biodiversity and geodiversity. Review testing to ensure that both are fully considered
Herefordshire & Worcestershire Earth Heritage Trust	CSDSA20	Appendix A: Table A.14	Need consistency with regards to SA Objective 12 - will the impacts be just on biodiversity, or biodiversity and geodiversity, or just geodiversity?	Noted. The objective considers impacts on both biodiversity and geodiversity. Review testing to ensure that both are fully considered
English Heritage	CSDSA32	Appendix A: Table A.18	Table A.18 should identify any potential implications for the historic environment for option 2 (reuse of buildings adjoining the canal) and option 4 (older industrial areas adjacent to Stourport on Severn).	Noted. Revisit this areas of the options testing.
English Heritage	CSDSA33	Appendix A: Table A.18	The sustainability appraisal should recognise the potential for impacts on the historic environment of renewable energy schemes e.g. Table A.18, option 3.	Noted. Revisit this area of the options testing.
Worcestershire County Council	CSDSA26	Appendix A: Table A.21	There is no mention of the County Council's work on landscape sensitivity	Noted. Consider re-wording objective to include an explanation of discrete areas.

Appendix 2: Summary of Responses received to the Core Strategy Draft Sustainability Appraisal Report

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			which can be used to direct development towards less sensitive sites and enable an understanding of comparative site sensitivity (see bullet point above). As it is, this objective concentrates on safeguarding discrete areas but does not explain what these are, or where or how they are to be identified.	
Worcestershire County Council	CSDSA28	Appendix A: Table A.21	Mention should be made that this should be linked to the appropriateness of mitigation in relation to landscape character.	Noted.
Worcestershire County Council	CSDSA27	Appendix A: Table A.21	This appears to concentrate on the need for green space provision within development and the protection of existing green space within urban areas. More emphasis is needed on linking urban and peri-urban green space to the rural network.	Noted. Consider re-wording objective to include the linking of existing open spaces to the rural network.
English Heritage	CSDSA34	Appendix A: Table A.22	SA findings reinforce limited interpretation of green infrastructure. E.g, option one - wider opportunities could be identified in relation to the historic resource of the River Severn.	Noted. Revisit this area of the options testing.
Herefordshire & Worcestershire Earth Heritage Trust	CSDSA21	Appendix A: Table A.22	Enhancing Greenspaces such the river corridors can also have a positive impact on geodiversity, through enhancement of geological features along the routes (e.g. red sandstone cliffs, other hidden features such as hermitages along the corridors -	Noted. Review testing to ensure that this is considered.

Appendix 2: Summary of Responses received to the Core Strategy Draft Sustainability Appraisal Report

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			these may well exist but as yet, have not been uncovered).	
Herefordshire & Worcestershire Earth Heritage Trust	CSDSA22	Appendix A: A.23	What about geodiversity benefits?	Noted. Review testing to ensure that geodiversity benefits are included.
English Heritage	CSDSA35	Appendix A: Table A.24	Tables A.24 and A.27 raise a number of positive benefits under objective 11 which are relevant to objective 13 but are not indicated there.	Noted. Revisit this area of the options appraisal.
Herefordshire & Worcestershire Earth Heritage Trust	CSDSA23	Appendix A: Table A.26	Provision of better walking and cycling networks as integral parts to new developments. This could result in biodiversity and geodiversity benefits by improving networks, clearing unwanted vegetation, replanting, artistic interpretations and so on.	Noted. Review testing to ensure that these benefits are included.
English Heritage	CSDSA36	Appendix A: Table A.27	Tables A.24 and A.27 raise a number of positive benefits under objective 11 which are relevant to objective 13 but are not indicated there.	Noted. Revisit this area of the options appraisal.
Herefordshire & Worcestershire Earth Heritage Trust	CSDSA24	Appendix A: Table A.28	Improvement to Historic Environment can have geodiversity benefits as well. The Heritage Park would exist, in part due to the geodiversity of the area creating the Severn Valley and associated mining and industrial heritage that occurs along it's course. Reusing and restoring historic buildings and structures should encourage the use of local building stone, to ensure that local character and historic value is	Noted. Include these benefits within the options testing.

Appendix 2: Summary of Responses received to the Core Strategy Draft Sustainability Appraisal Report

Organisation/ Respondent	Response Reference	Document Reference	Summary of Comment	Officer Response
			kept.	
Herefordshire & Worcestershire Earth Heritage Trust	CSDSA25	Appendix A: Table A.30	Could have a positive impact on geodiversity and the visitor economy, if the links between the District and the Geopark were enhanced (via publicity, signage etc) to encourage sustainable geotourism.	Noted. Include this in the options testing.