

## **Special Cabinet**

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

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

Part 3 of 5

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



## **APPENDIX 3A – RESPONSES AND OFFICER COMMENTS TO SECTIONS 29, 34 AND 36**

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## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 29 – SITE ALLOCATIONS

### INTRODUCTION

Company / Organisation	Response Number	Para	Type of Response	Summary of Response	WFDC Officer Response
	<a href="#">LPPO3927</a>	29.1	Object	The stated requirement is unjustified and not supported by objective evidence dismissing 3 independent analysis in favour of one that supports the Council's original agenda. I object strongly.	The objection is noted. A revised OAHN has been commissioned which reflects latest Government guidance.
	<a href="#">LPPO3928</a>	29.2	Object	The stated requirement is unjustified and not supported by objective evidence dismissing 3 independent analysis in favour of one that supports the Council's original agenda. I object strongly.	Your objection is noted. Further work on the OAHN has been commissioned and this will reflect the latest Government guidance. The sites selected for the pre-submission draft Local Plan and their potential capacity will reflect this new requirement.
	<a href="#">LPPO597</a>	29.2	Object	Let's keep Green Belt Green Belt.	Objection noted
Gladman Developments Limited	<a href="#">LPPO1400</a>	29.3	Object	It is essential that local plans are accompanied by a clear audit trail to set out how the assessment of potential sites for allocation has been undertaken. Any such process must be explicit, transparent and robustly justified within the Council's proportionate evidence base. This evidence must clearly set out what common factors have been considered and the resultant outcome for each site in reaching a robust planning judgment on site selection. It is essential that each interested party is able to fully understand why certain sites are proposed for allocation and why others are not. Reference is made to Telford & Wrekin's Inspector's note concerning the flawed site selection methodology.	A detailed site selection paper will accompany the draft pre-submission consultation draft. This will set out the key findings for each site from the various evidence base studies.
Historic England	<a href="#">LPPO1290</a>	29.4	Comment	There is no reference of historic environment	Noted. Evidence base list will be updated to

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				evidence base under paragraph 29.4.	include reference to historic environment.
	<a href="#">LPPO4408</a>	Core Sites	Object	I object to plan B and “Core sites”.	Your objection to development at Lea Castle is noted.
Historic England	<a href="#">LPPO1291</a>	29.8	Comment	Under paragraph 29.8 we would expect reference to the historic environment to be included where there were mitigation measures identified within the evidence base/ assessment process.	Individual site policies will reflect mitigation measures required for the historic environment as highlighted in the evidence base.
Education & Skills Funding Agency	<a href="#">LPPO1060</a>	29.9 infrastructure requirements site allocations	Comment	Note that several former school sites are proposed/allocated for housing. We would welcome opportunity to discuss their future redevelopment as new school provision may be needed as a result. Emerging ESFA proposals for a Forward Loan Fund to support delivery of schools at an early stage as part of mixed use developments may be of interest to WFDC.	Comments are noted. School sites listed came out of mainstream educational use as a result of the Wyre Forest Schools Review in 2007 when the education system changed from 3 tier to 2 tier. As a result of development proposals it is likely that 2 new primary schools will be required. Discussions between developers and County Education officers are in progress.
National Farmers Union West Midlands Region	<a href="#">LPPO1123</a>	Site Allocations	Comment	Where sites are allocated for development, the proximity of the land to existing livestock units must be examined. Sites should not be allocated for residential development if they are found to be in near proximity to an existing livestock unit. Farms can be sources of noise and odour and therefore neighbouring land could be unsuited to residential development.	Comments regarding proximity of livestock units to residential sites are noted. Any potential issues will be highlighted under site specific policy.
Natural England	<a href="#">LPPO1136</a>	Site	Comment	For the purposes of Natural England’s remit when	The detailed comments are noted. All large

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		Allocations - Policies 30 - 34		<p>considering site allocations we regard sites of around 100 or more houses or 3ha or more of employment land (as a rule of thumb) as 'strategic sites' and apply a range of considerations to inform plan making. The themes and issues described below are therefore relevant to the following site allocation policies:</p> <p>Policy 30 - Kidderminster Town – all tables.  Policy 31 – Kidderminster urban extensions - all tables  Policy 32 – Stourport-on-Severn – all tables  Policy 33 – Bewdley – Table 33.0.1  Policy 34 – Previously developed sites in the Green Belt – Table 34.0.1</p> <p><b>Least environmental value</b> – In particular allocations should avoid designated sites, priority habitats and best and most versatile land. NPPF para 110 refers – as do our previous consultation responses of 9.9.16 and 2.12.16.</p> <p><b>Landscape</b> - The allocation should be consistent with local plan landscape policies. A Landscape and Visual Impact Assessment should be undertaken for each site under consideration, and its conclusions should inform the development specification/masterplan/brief. Sites proceeding to formal allocation should conserve and enhance the landscape character of the area. NPPF paras 17, 109</p>	<p>allocations (100+ dwellings) being taken forward will provide a visual impact assessment as part of the background evidence. Impact on designated sites has been carefully assessed and any sites found to have a detrimental impact on SSSIs will be removed from the plan going forward.</p> <p>Impact on local designations will be carefully assessed and mitigation put in place where required. It is acknowledged that some allocations will impact on best and most versatile land. However, these sites are in more sustainable locations. Any development in the vicinity of ancient woodland will have at least the minimum 15m buffer applied as suggested. Presence of priority habitats and species has been assessed for all these larger sites. Green Infrastructure Concept Plans have been prepared for the key areas of the district where development is proposed. The strategic allocations will be based around the existing GI network providing enhanced GI and additional footpath networks.</p>

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				<p>and 170 refer.</p> <p><b>Sites of Special Scientific Interest (SSSI)</b> – please see above re ‘least environmental value’. NPPF para 118 also refers as do our previous consultation responses of 9.9.16 and 2.12.16. We look forward to meeting with the Council to discuss our previous responses regarding the potential impacts of those allocations likely to have adverse effects on SSSIs including: Hurcott Pasture, Hurcott &amp; Podmore Pools, Wilden Marsh &amp; Meadows, Hartlebury Common &amp; Hillditch Coppice, Areley Wood.</p> <p><b>Local Sites (biodiversity and geodiversity)</b> – While Natural England is unable to provide advice on the specific impacts of proposed development allocations on local sites we strongly encourage the Council to use locally available evidence and expertise to assess impacts on them. A number of local wildlife site datasets are available via <a href="http://gov.uk">gov.uk</a> Such sites should be mapped and impacts properly assessed. NPPF paras 113,117,118 refer.</p> <p><b>Ancient woodland and veteran trees</b> – our Standing Advice refers as does NPPF para 118.</p> <p><b>Priority species and habitats</b> – Proposed site allocations should take account of records of these assets. NPPF para 117 refers.</p> <p><b>Protected species</b> – As above. Our standing advice refers.</p> <p><b>Ecological networks</b> – Allocations should set out</p>	

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				<p>how connectivity of the network will be maintained or enhanced. NPPF para 117 refers.</p> <p><b>Green infrastructure</b> – Allocations should maintain and enhance the green infrastructure resource by connecting with existing GI and providing new GI on site. NPPF para 114 refers.</p> <p><b>Rights of way</b> – Allocations should protect and enhance public rights of way, incorporating them into new development in sympathy with their character and quality. NPPF paras 74 and 75 refer.</p>	
South Worcestershire Authorities	<a href="#">LPPO1249</a>	Site Allocations	Comment	<p>It is noted that there are a number of housing and employment sites that border Wychavon and Malvern Hills District administrative boundaries.</p> <p>The following housing and employment sites are adjacent to Wychavon and Malvern's boundary which could have cross boundary infrastructure delivery implications which will need to be considered as the Plan progresses, the implications will differ depending on which of the two options is taken forward:</p> <p><b>Wychavon:</b></p> <ul style="list-style-type: none"> <li>FPH/29 VOSA site, North of Summerfield (employment) 1.72 ha</li> <li>FPH/27 East Of Kidderminster: Easter Park, Worcester Road (employment) 9.66 ha</li> </ul>	Your comments on potential allocations along the borders with Malvern Hills and Wychavon are noted. Further discussions are taking place with developers on many of the sites listed. If any sites are proposed in the next stage of the Local Plan which are near the administrative boundary we will discuss them as part of the Duty to Cooperate meetings.

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				<ul style="list-style-type: none"> <li>WFR/ST/2 East Of Kidderminster: Land off Stanklyn Lane, and AS/10 Rear of Spennells and Easter Park – (Option A) up to 930 dwellings</li> <li>M1/10 4 Acres Caravan Site (ADR) – The SWCs welcome that the ADR site continues to be safeguarded during the plan period.</li> <li>M1/3 Parson Chain, Stourport on Severn, (Core Site) 114 dwellings and a link road to relieve congestion at Hartlebury / Worcester Road Island.</li> </ul> <p><b>Malvern:</b></p> <ul style="list-style-type: none"> <li>AKR/14 Pearl Lane, Stourport on Severn (Option B) 420 dwellings – In addition to the comments set out earlier within this letter, we acknowledge that a number of issues have been raised about this site including: drainage, encroachment in the countryside, extra traffic which would lead to a new Air Quality Management Area to be implemented.</li> <li>AKR/15 Rectory Lane, Stourport on Severn (Option B) 130 dwellings</li> <li>BR/RO/1 Former garage, land at Clows Top (Core Housing / Travelling Showpeople site)</li> </ul>	



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				30 dwellings.	
Historic England	<a href="#">LPPO1289</a>	Site Allocations	Comment	<p>Can the Council give us the historic environment assessment work accompanying the sites which assesses the potential impact proposed development will have on the significance of heritage assets? There is no historic environment information on the maps or in the comments relating to the sites so we are unsure as to what evidence base the Council has and how they are conforming with the requirements of the NPPF.</p> <p>We would be happy to attend a meeting and go through each of the proposed site allocations with the Council and to assist them in developing an assessment process, if this has not already been undertaken.</p> <p>I include a link to Historic Environment Advice Note on Site Allocations and Local Plans which I hope you will find useful. <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</a></p> <p>At this stage it is difficult to tell if Historic England will have objections to the sites though we would welcome the opportunity to work with the Council prior to the next consultation stage.</p>	A detailed historic environment evidence base has been developed for each of the potential allocations.

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Health and Safety Executive CEMHD5	<a href="#">LPPO18</a>	Site Allocations	Comment	<p>HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard establishments and major accident hazard pipelines (MAHPs) is achieved. HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages of the planning process. We also recognise that there is a requirement for you to meet the following duties in your plan, and that consultation with HSE may contribute to achieving compliance:</p> <ol style="list-style-type: none"> <li>1. The National Planning Policy Framework (Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents</li> <li>2. Regulation 10(1)(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment by pursuing those objectives through the controls described in Article 13 of Council Directive 2012/18/EU (Seveso III). Regulation 10(c)(i) requires that regard also be</li> </ol>	The advice is noted. In terms of potential allocations affecting HSE consultation zones, site OC/13S is not being taken forward. Site WFR/WC/32 is being progressed but the gas main runs through the neighbouring land which is not being brought forward. The area within the consultation zone for this pipeline is likely to be used for landscaping rather than built development. This issue has been highlighted to the landowner.

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				<p>had to the need, in the long term, to maintain appropriate safety distances between establishments and residential areas, buildings and areas of public use, recreational areas, and, as far as possible, major transport routes.</p> <p>At this early stage HSE can give a general opinion regarding development compatibility based only on the outline information contained in your plan. This opinion takes no account of any intention to vary, relinquish or revoke hazardous substances consents. Planning authorities are advised to use HSE's Planning Advice Web App to verify any advice given. The Web App is a software version of the methodology used in providing land use planning advice. It replaces PADHI+. Further information on the Web App is available on HSE's website: <a href="http://www.hse.gov.uk/landuseplanning/padhi.htm">http://www.hse.gov.uk/landuseplanning/padhi.htm</a></p> <p><b>Encroachment of Local Plan Allocations on Consultations Zones</b></p> <p>We have concluded that there is the potential for land allocated in your plan to encroach on consultations zones. The land allocations that could be effected are as follows:</p> <p><b>STONE HILL SOUTH – OC/13</b> – HSE Ref: 7169 National Grid Gas Pipeline – Hossil</p>	

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				<p>Lane/Kidderminster</p> <p><b>LEA CASTLE HOSPITAL EXTENSION (EAST) – WFR/WC/32</b> – HSE Ref: 6867 National Grid Gas Pipeline – Blakedown/Swindon</p> <p><b>Compatibility of Development with Consultation Zones</b></p> <p>The compatibility issues raised by developing housing and workplaces within the inner, middle and outer zones are summarised below.</p> <p><b>Housing Allocations</b></p> <p><u>Inner Zone</u> – Housing is not compatible with development in the inner zone. HSE would normally Advise Against such development. The only exception is developments of 1 or 2 dwelling units where there is a minimal increase in people at risk.</p> <p><u>Middle Zone</u> – The middle zone is compatible with housing developments up to and including 30 dwelling units <i>and</i> at a density of no more than 40 per hectare.</p> <p><u>Outer Zone</u> – Housing is compatible with development in the outer zone including larger</p>	

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				<p>developments of more than 30 dwelling units and high-density developments of more than 40 dwelling units per hectare.</p> <p><b>Workplace Allocations</b></p> <p><u>Inner Zone</u> – Workplaces (predominantly non-retail) providing for less than 100 occupants in each building and less than 3 occupied storeys are compatible with the inner zone. Retail developments with less than 250m<sup>2</sup> total floor space are compatible with the inner zone.</p> <p><b>Note :</b> Workplaces (predominantly non-retail) providing for 100 or more occupants in any building or 3 or more occupied storeys in height are compatible with the inner zone where the development is at the major hazard site itself and will be under the control of the site operator.</p> <p><u>Middle Zone</u> – The middle zone is compatible with workplaces (predominantly non-retail). Retail developments with total floor space up to 5000m<sup>2</sup> are compatible with the middle zone.</p> <p><u>Outer Zone</u> – Workplaces (predominantly non-retail) are compatible with the outer zone. Workplaces (predominantly non-retail) specifically</p>	

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				<p>for people with disabilities (e.g. sheltered workshops) are only compatible with the outer zone. Retail developments with more than</p> <p>5000m<sup>2</sup> total floor space are compatible with the outer zone.</p> <p>This is a general description of the compatibility for housing and workplaces. Detail of other development types, for example institutional accommodation and education, and their compatibility with consultations zones can be found in the section on <i>Development Type Tables</i> of HSE's <i>Land Use Planning Methodology</i> , which is available at:</p> <p><a href="http://www.hse.gov.uk/landuseplanning/methodology.pdf">http://www.hse.gov.uk/landuseplanning/methodology.pdf</a></p> <p>Mixed-Use Allocations</p> <p>Because of the potential complexity when combination use classes are proposed, advice regarding mixed-use allocations is outside the scope of the general advice that can be given in this representation. Please refer to the Web App to determine HSE's advice regarding mixed-use developments.</p>	

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				<p><b>Verification of Advice using the Web App</b></p> <p>The potential for encroachment is being brought to your attention at an early stage so that you can assess the actual extent of any incompatibility on future developments. Information on the location and extent of the consultation zones associated with major hazard establishments and MAHPs can be found on HSE's extranet system along with advice on HSE's land use planning policy. Lists of all major hazard establishments and MAHPs, consultation zone maps for establishments, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access HSE's Planning Advice Web App; further information is available on HSE's website:  <a href="http://www.hse.gov.uk/landuseplanning/padhi.htm">http://www.hse.gov.uk/landuseplanning/padhi.htm</a></p> <p>. When sufficient information on the location and use class of sites becomes available at the pre-planning stages of your local plan, the use of the Web App could assist you in making informed planning decisions about development compatibility.</p> <p><b>Identifying Consultation Zones in Local Plans</b></p> <p>HSE recommends that where there are major</p>	

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				<p>hazard establishments and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. This is an effective way to identify the development proposals that could encroach on consultation zones, and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information.</p> <p>We particularly recommend marking the zones associated with any MAHPs, and HSE advises that you contact the pipeline operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence.</p> <p><b>Identifying Compatible Development in Local Plans</b></p> <p>The guidance in HSE's Land Use Planning Methodology, available at <a href="http://www.hse.gov.uk/landuseplanning/methodology.pdf">http://www.hse.gov.uk/landuseplanning/methodology.pdf</a> will allow you to identify compatible development within any consultation zone in the area of your local plan. HSE recommends that you include in your plan an analysis of compatible</p>	



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				<p>development type within the consultation zones of major hazard establishments and MAHPs based on the methodology. The sections on <i>Development Type Tables</i> and the <i>Decision Matrix</i> are particularly relevant, and contain sufficient information to provide a general assessment of compatible development by use class within the zones.</p> <p>There are a number of factors that can alter a Web App decision, for example where a development straddles 2 zones. These factors are outside the scope of the general advice in this letter. <u>HSE's final advice on development compatibility can only be determined through use of the Web App.</u></p> <p><b>Provision of Information to Interested Parties – Pipeline Operators</b></p> <p><b>The pipeline operator/s referred to will be sent a copy of this representation to make them aware of HSE's preliminary advice on this matter</b></p>	
	<a href="#">LPPO4661</a>	Section C	Comment	Are all Core housing sites definitely going to be built on or will this be part of the Pre-Submission stage decisions? It's worrying to see the number of Core housing sites on the Green Belt of our towns, surely it would be more beneficial to build on the brownfield sites first which is what I assume would be the preferred approach by the Council too given	The final list of sites going forward to the pre-submission consultation is likely to be a mix of those in the Preferred Option (both Core, option A and option B) plus additional sites which have either been submitted during the Preferred Options consultation or were assessed through the HELAA. Further

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				<p>the existing utilities and infrastructure available to these sites?</p> <p>Referring to Section C, Site Allocations, there are c1500 dwellings that can be built before even thinking about the Green Belt sites. Should this not be the obvious choice first of all? Furthermore, having looked in detail at Section C I can see that if all of the site locations and potential number of dwellings are added together, for Core, Option A and Option B, there are only 3,891 dwellings. Have I calculated this correctly? Does this mean that essentially the Options will be taken away at some stage between now and 2034 as ultimately all of the sites (and more) will need to be developed to meet the 5,400 target?</p>	<p>work to update the housing requirement is underway taking into account the Government's latest guidance and recently released population figures. Until the final housing requirement is known, the list of sites cannot be finalised. It should be noted that more sites will be put forward for allocation than are required to allow for sites not being developed. A number of additional areas of safeguarded land will also be put forward for removal from the Green Belt. These sites could then be brought forward for release for development at a future Local Plan review once the existing allocations have been exhausted.</p>
Stanmore Properties Ltd	<a href="#">LPP01517</a>	Site Allocations	Comment	<p>It is acknowledged that an evidence base has been prepared to assess sites for allocation. In the absence of a Topic Paper it is difficult to justify the selections made and why certain elements of an allocation have arisen. For example, in respect of Core Site BW/4, the allocation states the site can accommodate a total of 200 dwellings across the entire site with extensive areas left undeveloped to protect Hurcott Pastures SSSI and Hurcott Wood Nature Reserve. There is no evidence as to why it is capable of accommodating only 200 dwellings which is low for a site of 13.80 ha even allowing for</p>	<p>Comments are noted. A Site Selection Paper will be published alongside the pre-submission consultation document. Further pieces of evidence base work have been commissioned and all of this work will be summarised in this paper on a site by site basis.</p> <p>In terms of BW/4 - the figure of 200 dwellings was based on the capacity of a single access out onto Stourbridge Road with no secondary access off Hurcott Lane.</p>

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				35% green infrastructure.	Further details will be given in the site selection paper.
Ramblers Association	<a href="#">LPPO4138</a>	Section 29	Comment	<p>Section 29 to 35 deal with site allocations for various land use proposals. Basic information is given in tables and the reasoned justification but no information is given about constraints. We think that such information should be available as it has an impact upon the capacity of sites and consequently their value.</p> <p>As examples, the site at Clows Top earmarked as a possible Travelling Show Persons' site has a footpath at one side of it. Ramblers would have some doubt that the two uses are compatible. Also, as already discussed above, the Preferred Option site to the south east of Kidderminster has a number of footpaths across it. I assume that you must have been aware of these constraints in considering the suitability of these sites for the proposed uses. Not drawing attention to their existence could imply that prospective developers do not have to take them into account.</p> <p>There will be other sites in your list that will have footpaths and other constraints on them and they ought to be considered and flagged up in bringing the sites forward for development.</p>	Officers are aware that a number of sites have footpaths affecting them. This is flagged up in the assessment sheets compiled for each site in the Housing and Economic Land Availability Assessment (HELAA). Detailed site policies will be drawn up for the next stage of the Local Plan process for those sites being taken forward. Any public rights of way will be mentioned in the site policy.

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				I trust that these comments will be helpful to you in progressing the local plan and apologise that it has not been possible to make an earlier response.	
	<a href="#">LPPO447</a>	29 - Site Allocations	Object	<p>I object to Option A and Option B, also to some of the Core Sites. By requesting 'A' or 'B' you imply acceptance of the Core Sites.</p> <p>I object (at Lea Castle) to Option A, Option B, and the removal of the trees along the Core Site from the Green Belt.</p>	Your objections relating to the development at Lea Castle are noted. However, there are no plans for widespread removal of the trees at Lea Castle. The mapping on the document simply showed the extent of the landholding.
The Woodland Trust	<a href="#">LPPO532</a>	site allocations	Object	<p>We wish to object to the following site allocations as they are either within or adjacent to an area of ancient woodland. We have set out in our comments as to the importance of ancient woodland in our response under the Green Infrastructure section and also in more detail in our submission at the Issues and Options stage. In summary, it is an irreplaceable habitat, it is strongly protected in national planning policy and so it is imperative that any development which could damage ancient woodland is avoided.</p> <ul style="list-style-type: none"> <li>• FPH/8 SDF and adjacent land</li> <li>• WFR/WC/18 Sion Hill School site</li> <li>• FPH/1 Settling Ponds</li> <li>• WFR/WC/15 Lea Castle Hospital</li> <li>• OC/4 East of Kidderminster (N)</li> </ul>	<p>Officers agree that Ancient Woodland should be protected and any proposed allocations being taken forward will require development to be set back a minimum of 15m from the edge of ancient woodland.</p> <p>FPH/8 site boundary revised to keep development 15m back from edge of woodland (redevelopment of existing buildings)</p> <p>WFR/WC/18 Mostly redevelopment on existing footprint of school buildings</p> <p>FPH/1 not being taken forward</p> <p>WFR/WC/15/32 all woodland being retained</p>

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Company / Organisation	Response Number	Para	Type of Response	Summary of Response	WFDC Officer Response
				<ul style="list-style-type: none"> <li>OC/13S Stone Hill South</li> <li>WFR/ST/1 Captains &amp; The Lodge</li> <li>WFR/WC/32 Lea Castle Hospital extension (E)</li> <li>AKR/14 Pearl Lane</li> <li>BR/BE/6 Land off Highclere</li> </ul>	<p>on site. Axborough Wood will be protected from development through policy.</p> <p>OC/4 not being taken forward</p> <p>OC/13S not being taken forward</p> <p>WFR/ST/1 not being taken forward</p> <p>AKR/14 reduced scheme being taken forward. Will not impact on Areley Wood</p> <p>BR/BE/6 not being taken forward</p>
Environment Agency	<a href="#">LPPO1185</a>	29.4	Support	Paragraph 29.4 confirms all sites have been assessed against national and local policy and technical evidence, including the Level 1 and 2 SFRA and WCS. This will help to inform the sequential test to site allocation and ensure development is deliverable.	Your support is noted. The SFRA and WCS have been used to further inform the site selection going forward.

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 34 – PREVIOUSLY DEVELOPED SITES IN THE GREEN BELT

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Kidderminster Harriers Football Club	<a href="#">LPP0996</a>	Policy 34	Comment	Amend policy to include proposed <u>site south of Kidderminster for the proposed centre of sporting excellence and relocated Kidderminster Harriers stadium and associated facilities. Remove from Green Belt.</u>	Officers do not consider that this policy is relevant to the proposal in question. The site is part of a larger policy allocation for Minster Road Outdoor Sports Area.
West Midland Safari Park	<a href="#">LPP01331</a>	Policy 34	Comment	We support the designation of the Park as a previously developed site in the Green Belt in the Green Belt, and the support given by the Policy to development proposals that support and enhance the park's operations as a leisure and tourism destination. We object however to the section of the Policy which requires the design and landscaping of development to minimise the impact on the Green Belt through using sensitive materials and colours and providing extensive landscaping. RPS considers that these considerations do not impact on whether or not development is appropriate in the Green Belt, and proposing to control development in the Green Belt does not enjoy the support of Section 9 of the National Planning Policy Framework, Other policies in the Local Plan, notably Policy 11C and Policy 27C, along with the Councils' Design DPD can adequately deal with these matters.	Support for designation of WMSP under this policy is noted.  The section on design and landscaping of development refers to previously developed site in the Green Belt which are not specifically allocated under this policy. The final sentence will be amended to read as ' For other previously developed sites in the Green Belt, applications for development will be considered against this policy framework and the rest of the policies in the plan.'
West Midland Safari Park	<a href="#">LPP01332</a>	34.4	Comment	We object to the extent of the previously developed land (PDL), as shown on the plan on page 187 of the Preferred Options document.	Your objections are noted. However, officers do not agree that the extent of the previously developed area should be extended to take in the drive-thru- safari area. The red line boundary

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 34 – PREVIOUSLY DEVELOPED SITES IN THE GREEN BELT

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>RPS considers that the boundary should be the same as the 'Development Envelope' area shown in red on the plan (Figure 1). The general principle for the identification of major tourist attractions as major previously developed sites under PPG2 was to include all the main operational areas within the attraction, including buildings, amusement park rides and associated infrastructure, animal enclosures and lakes (where they fall within operational area).</p> <p>It is considered, however, that other operational land (including the Safari Drive), the car parks and the other lakes should also be defined as previously developed land. We consider that the hotel/waterpark site should be included as that has an extant planning permission and will be implemented within the Plan period. The animal areas should also be included as they contain buildings and various other significant structures, such as fencing.</p> <p>Given the guidance in the National Planning Policy Framework, the designation of these areas would ensure that, by definition, only development that has no strategic impact on the Green Belt will be permitted without the need to demonstrate very special circumstances. All other forms of inappropriate development would need to follow</p>	will be extended northwards to include the land with permission for the water park/hotel and conference centre.

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 34 – PREVIOUSLY DEVELOPED SITES IN THE GREEN BELT

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>the normal approach where very special circumstances would need to be demonstrated. This wider designation would not be a blanket designation where all forms of development would be acceptable at all locations within the park. This means that, for example, within the Safari Drive area, the replacement of buildings and structures for animals would not need to demonstrate very special circumstances. However, the intensification of these areas outside the parameters of the previously-developed site, or which would be harmful to openness, would need to demonstrate very special circumstances. This is particularly important at WMSP where animal houses and maintenance buildings need to be upgraded, relocated or replaced, and the PDL designation would provide a framework for this. Essentially, the parameters within which development can take place would differ depending on which zone of the park the development proposed is within; so the Safari Drive would differ from the Amusement Park. Given the scale of the site, it is entirely appropriate to apply a PDL designation to all of the operational parts of the site as shown in Figure 1. The undeveloped/non-operational areas should fall outside the MDS.</p>	
Horton Estates	<a href="#">LPP0866</a>	Policy 34	Comment	Firstly, it is requested that this policy be re-titled	Agree with first comment - policy title will be



## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 34 – PREVIOUSLY DEVELOPED SITES IN THE GREEN BELT

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Ltd				because it isn't limited to "allocated" PDL sites but also covers "windfall" PDL sites. Secondly, we request that Cursley Distribution Park be specifically identified/allocated as a PDL site in the Green Belt under this policy (the site boundary is identified on the enclosed Existing Site Plan). This comprises a 10ha site providing a significant quantum of employment floorspace (22,577sqm), including several large warehouses. It is similar in scale to the nearby Rushock Trading Estate and its identification under this policy is therefore fully justified. Finally, the view is taken that the policy should explicitly confirm that replacement buildings, limited infilling and partial/complete redevelopment will be supported at PDL sites in the Green Belt in principle. This would be in accordance with NPPF para. 89 and would also link to draft Policy 25.	amended to read as 'Previously Developed Sites in the Green Belt'.  Second comment - Cursley Distribution Park will be specifically identified under this policy. The policy will confirm that replacement buildings, limited infilling and partial/complete redevelopment will be supported for B1, B2 and B8 uses.

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 36: MONITORING AND IMPLEMENTATION FRAMEWORK

Company / Organisation	Response Number	Para	Type of Response	Summary of Response	WFDC Officer Response
Stanmore Properties Ltd	<a href="#">LPPO1526</a>	IDP	Comment	<p>BW/4a and BW/4b should be considered as one site and the whole site should be liable for the infrastructure costs of the development. Splitting the site unfairly allows the northern part of the site to benefit from existing school capacity to the cost of the rest of the site. Furthermore, it should be noted the planning application on the northern part of the site is for up to 100 dwellings, not 82 which is the number shown on an indicative layout and therefore to calculate contributions based on 82 dwellings is erroneous.</p> <p>Overall, the whole site BW/4 should be master planned as one complete site and this would allow for the most efficient layout to be achieved with shared infrastructure, particularly open space. This will lead to the most efficient use of the land and is likely to deliver the greatest number of houses on the site and the greatest infrastructure benefits.</p>	Your comments are noted. Planning permission is now in place for 91 dwellings on the northern part of the site. This includes a S106 agreement covering contributions towards education provision, open space provision and highways infrastructure. This site will be brought forward as a stand alone development.
	<a href="#">LPPO385</a>	Section 106 obligations	Comment	What financial contributions are the developers expected to make under s106? Residents should have sight of the deal the council is striking to weigh up value for money.	Details are provided in the Infrastructure Delivery Plan and Planning Contributions SPD.
Taylor Wimpey West Midlands	<a href="#">LPPO1551</a>	Paragraph 36.3	Comment	No evidence to demonstrate delivery rates of both options in the Preferred Options document. It is extremely important that a Housing Trajectory is prepared so that development rates of each site	Your comments are noted. The plan period is now to be extended until 2036. This should allow time for larger urban extension sites to be delivered within the plan period. Detailed

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 36: MONITORING AND IMPLEMENTATION FRAMEWORK

Company / Organisation	Response Number	Para	Type of Response	Summary of Response	WFDC Officer Response
				<p>are fully transparent and can be publicly scrutinised. As highlighted in the context of Rugby Borough (whereby their sites were not in the Green Belt), there is concern that the larger sites may not be delivered, or delivered in full, within the plan period. For example, the plan is not likely to be adopted and, accordingly sites removed from the Green Belt, until 2019, after which the preparation, submission and determination of all planning applications, reserved matters and conditions is likely to take three to five years and earliest completions can be anticipated from year 7 of the 22 year plan. It should be noted that this does not allow for any significant infrastructure that may be required. If five developers deliver 50 per annum, which is 250 per annum, the urban extensions will provide 3,000 dwellings over the remaining plan period. This would result in the urban extensions being completed beyond the plan period.</p> <p>To overcome this, one potential option would be to alter the plan period to commence in 2016 and extend to 2041. This would provide a longer plan period and, although it is acknowledged further OAN work would need to take place, on the basis of the 300 dwellings per annum based on the emerging Plan, a new dwelling requirement of 7,500 would result in a need to identify a supply</p>	<p>site policies will give details of expected delivery timescales. Larger sites are expected to be delivered in phases with multiple sales outlets allowing for an increased rate of housing delivery.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 36: MONITORING AND IMPLEMENTATION FRAMEWORK

Company / Organisation	Response Number	Para	Type of Response	Summary of Response	WFDC Officer Response
				<p>of land equivalent to the delivery of 9,000 dwellings (7,500 + 20%). As demonstrated by the site schedules in the SHELAA, there are sufficient sites to meet the revised land supply requirement, which would allow for both Option 'A' and a dispersal strategy to be delivered.</p> <p>Furthermore, the SHELAA also identified that there is further capacity over and above the 9,000 dwellings to provide relief to the neighbouring HMA whereby housing delivery is proving to be difficult.</p> <p>An alternative approach would be to identify the Option 'A' urban extension as safeguarded land to be delivered beyond the plan period. This mechanism would remove land from the Green Belt and secure the delivery of the Eastern Relief Road in the longer term and would be consistent with paragraph 85 of the NPPF which sets out that: 'where necessary, local planning authorities should identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer term development needs stretching well beyond the plan period.'</p> <p>This approach would secure the benefits of Option 'A' yet be realistic in respect of the contributions to housing delivery from the urban extensions.</p>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 36: MONITORING AND IMPLEMENTATION FRAMEWORK

Company / Organisation	Response Number	Para	Type of Response	Summary of Response	WFDC Officer Response
Education & Skills Funding Agency	<a href="#">LPPO1061</a>	Chapter 36	Comment	<p>One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. There is a need to ensure that education contributions made by developers are sufficient to deliver additional school places required. The ESFA support the Council's approach to ensure developer contributions address the impacts arising from growth.</p> <p>The ESFA would like to respond to any update to the Infrastructure Delivery Plan. Please add us to database for future Developer Contributions/CIL</p>	ESFA has been added to database as requested.
Place Partnership Ltd	<a href="#">LPPO1098</a>	Monitoring and Implementation Framework 36.1, 36.2	Comment	<p>WP, WMP and HWFRS are supportive of the proposal for the IDP to detail the infrastructure required to support the proposals and development sites in the Local Plan. We also welcome the recognition that both the Community Infrastructure Levy (CIL) and Section 106 mechanisms will be required to deliver this.</p> <p>Pleased that the contents of the IDP on pages 60 – 61 reflect the representations that we submitted to the Council on the 05 September 2016 and 05 January 2017.</p> <p>We would like to update the aforementioned representations by enclosing in <b>Appendix 2</b> details of the most recent Secretary of State and Planning</p>	NOT FINISHED

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 36: MONITORING AND IMPLEMENTATION FRAMEWORK

Company / Organisation	Response Number	Para	Type of Response	Summary of Response	WFDC Officer Response
				<p>Inspectorate appeal decisions supporting Section 106 contributions for the police service. They confirm that the principle of and methodology used to request such contributions are wholly compliant with the CIL Regulations. They also confirm that 'infrastructure' is a broad term and includes not just includes buildings, but equipment and vehicles too, with all types acceptable within the terms of the CIL Regulations.</p> <p>Disappointed to see that the table enclosed in Appendix A of the IDP has not taken into account the aforementioned representations. No reason is given for this. However, please find enclosed in <b>Appendix 3</b> an update for inclusion in the IDP.</p> <p>Overall, we trust that this response is of assistance to the preparation of the Wyre Forest Local Plan Review, but should there be any queries or further information is needed, please do not hesitate to contact us.</p>	

## **APPENDIX 3B – KEY ISSUES ARISING FROM RESPONSES**

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## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 30: KIDDERMINSTER TOWN

Site	Key Issues Raised	WFDC Officer Comments
AS/1 – Comberton Place	<ul style="list-style-type: none"> <li>This includes what should be an opportunity site for a Park and Ride car park related to the station.</li> </ul>	Part of this site is now being developed for 23 dwellings. Some public car parking is retained
AS/5 – Victoria Carpets Sports Ground	<p>Support:</p> <ul style="list-style-type: none"> <li>Supportive of the proposed allocation.</li> <li>The site is deliverable and a planning application will be submitted shortly.</li> </ul> <p>Objections:</p> <ul style="list-style-type: none"> <li><b>Flooding.</b> The site floods significantly and often and is within Flood Zone 2. The significance and impact of this has not been appreciated in the site's HELAA Assessment.</li> <li>A housing development on this site could have serious implications on the viability and playing of golf at KGC.</li> <li><b>Loss of Sport facility/Playing field.</b> The proposal is in conflict with the plan which seeks to protect and safeguard community facilities.</li> <li>The site is a prominent and important open space on a major thoroughway of the town. Its loss to bricks and mortar will deplete its green, open value.</li> <li>The adjoining Golf Course has a habitat for wide ranging flora and fauna, some of which could include protected.</li> <li><b>Traffic.</b> There is an issue with traffic both vehicular and pedestrian. Access to the site is difficult given the high volume of traffic in the area both on the A449 Trunk Road and the Spennells Valley Road and the proximity to the traffic island.</li> <li>How is the loss of the playing field to be mitigated and how does it accord with the PPS?</li> <li>Currently allocated as open space.</li> <li>Will impact on open space, sport and recreation facilities and sites could be lost if allocated prior to being informed by the built and playing field strategies.</li> </ul>	This site now has planning approval (outline) for up to 45 dwellings. It has not been used as a playing field since 2003. Access will be taken from the Spennells Valley Road.
AS/6 – Lea Street School	<p>Objections:</p> <ul style="list-style-type: none"> <li>There is a period of uncertainty about when site could be delivered and as such this test is not met.</li> <li>SHLAA states part of site still in use and thus allocation is not NPPF compliant.</li> </ul>	The building has been confirmed as not fit for purpose for the current users (a small pupil referral unit plus ancillary education staff). New premises are being sought.



## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 30: KIDDERMINSTER TOWN

Site	Key Issues Raised	WFDC Officer Comments
BHS/2 – Bromsgrove Street	<p>Comments:</p> <ul style="list-style-type: none"> <li>Many other attractive old and empty buildings are ideal for conversion to attractive town centre living.</li> <li>Additional shops and restaurants in this area are not desirable or economically sustainable.</li> </ul> <p>Objections:</p> <ul style="list-style-type: none"> <li>An unsuitable area for a commercial retail island, but should be considered as an area for housing development only.</li> </ul>	The former magistrates' court building is now listed Grade II and is expected to be brought forward for mainly residential uses. Plans for a leisure use on the former Glades site are well advanced. This will include ancillary restaurants. Part of the existing car park will be retained as part of this proposal with the remainder potentially being available for residential use. The former health centre buildings are being retained by the NHS.
BHS/16 – Timber Yard, Park Lane	<p>Objections:</p> <ul style="list-style-type: none"> <li>Appears to include a DW sport and fitness centre. How does this fit with the Built Sports Facility Strategy? Is it surplus? How does the proposal meet NPPF Par 74?</li> <li>Policy and supporting text is very limited and narrow on what form development should take on this gateway site. KCAAP provides detailed guidance and this should be replicated in the Local Plan Review.</li> <li>Will impact on open space, sport and recreation facilities and sites could be lost if allocated prior to being informed by the built and playing field strategies.</li> </ul>	The site only includes the former timber yard and its buildings plus additional land on Park Lane. It does not include land on the other side of the canal. The KCAAP policy will be used as a basis for the policy going forward into the Local Plan
BHS/18 – Blakebrook School	<p>Comments:</p> <ul style="list-style-type: none"> <li>This paragraph speaks of the potential for a cycle path/pedestrian path in relation to St John's Close (and Church View). It is difficult to understand how this may be achieved.</li> </ul> <p>Objections:</p> <ul style="list-style-type: none"> <li>County Buildings and Blakebrook School - includes listed chapel and TPOs. Question whether capacity is too high at 35dph.</li> <li>Capacity should be reduced.</li> </ul>	Permission is now in place for a development of 40 dwellings plus the conversion of the former library building adjacent to Bewdley Road. There are no links to the residential development to the rear proposed. The listed chapel and curtilage buildings do not form part of this application. They will be retained and there are proposals to convert them non-residential uses.
BW/1 – Churchfields	<p>Objections:</p> <ul style="list-style-type: none"> <li>Current application for 95 dwellings/offices on part of site. Question</li> </ul>	A revised application for up to 270 dwellings and including conversion of 1902 building is

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 30: KIDDERMINSTER TOWN

Site	Key Issues Raised	WFDC Officer Comments
	deliverability of rest of site as subject to tenancies. Suggest capacity is reduced significantly.	expected to be determined by the planning committee in late 2018. Existing site tenants are on short-term leases.
BW/2 - Limekiln Bridge	<p>Support:</p> <ul style="list-style-type: none"> <li>Supports zoning of BW/2 for residential.</li> </ul> <p>Objections:</p> <ul style="list-style-type: none"> <li>The site includes a MUGA. Is this to be protected, relocated or is it surplus? How does it meet with NPPF Par 74?</li> <li>Deliverability of site is questionable. No evidence to show site is viable.</li> <li>In accordance with the adopted and emerging Plans the employment element of this site must be clearly shown to be surplus to requirements through robust evidence.</li> <li>Protect Limekiln Park (existing basket ball court).</li> <li>Question deliverability of site as new link road required to bring site forward.</li> <li>Will impact on open space, sport and recreation facilities and sites could be lost if allocated prior to being informed by the built and playing field strategies.</li> </ul>	The existing basketball court has not been used/maintained for a number of years. The link road will need to be brought forward prior to this site being developed. Funding is now in place and it is expected to be delivered in 2019/20. Talks between the Council and the landowner of the employment site are ongoing. Any proposal will be expected to include some form of open space.
BW/3 – Sladen School	<p>Comments / Support:</p> <ul style="list-style-type: none"> <li>Demolished in 2009 but progress has not been made.</li> <li>It is about time the old school of Sladen was used for building houses but please improve the road access at the Horsefair first.</li> </ul> <p>Objections:</p> <ul style="list-style-type: none"> <li>The Sladen school land was provided by the Church for the specific purpose as an educational facility. What is the status of the covenant that forbade other uses?</li> <li>Sport England may require large area of sports field to be retained. Capacity of 72 should be reduced.</li> <li>This will give rise to the loss of playing field. Is this in compliance with NPPF Par 74 and SE Policy? Is the loss supported by the PPS - is the playing field surplus?</li> <li>Will impact on open space, sport and recreation facilities and sites could be lost if allocated prior to being informed by the built and playing field strategies.</li> </ul>	It is still intended to bring the site forward for a mix of general needs housing and supported housing. The link road at Churchfields will need to be provided prior to this site coming forward. Some form of open space suitable for sports use should be provided as part of any development proposal as this playing field was assessed as part of the Open Space Study.
FPH/6 – Oasis – Goldthorn Road	<p>Objections:</p> <ul style="list-style-type: none"> <li>Although currently allocated, site has not come forward. Delivery is questionable and it should be removed from plan.</li> </ul>	Site has had its lease renewed for employment and has therefore been removed from the plan in order to safeguard

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 30: KIDDERMINSTER TOWN

Site	Key Issues Raised	WFDC Officer Comments
		jobs.
FPH/18 – Naylor's Field	<p>Objections:</p> <ul style="list-style-type: none"> <li>• Today it is still used by children playing football etc. The proposed development of 35 dwellings would be totally out of character with the area.</li> <li>• Residents' access to fields will be restricted.</li> <li>• Community event held on fields.</li> <li>• Spoil the view from the houses.</li> <li>• WFDC stated in writing that "they do not support any housing scheme" and that historically the land had "educational use" as playing fields.</li> <li>• The loss of habitat for wildlife.</li> <li>• Sutton Park Road itself is already busy and congested.</li> <li>• Use brown field sites not green field.</li> <li>• Should be maintained as open space - subject to para.74 of NPPF.</li> <li>• Will impact on open space, sport and recreation facilities and sites could be lost if allocated prior to being informed by the built and playing field strategies.</li> </ul>	<p>This site is surplus to education requirements. It is acknowledged that it has informal use but it is not marked out as a playing pitch. Any development will need to retain 40% of the site as open space/green infrastructure.</p>
FPH/24 – Romwire	<p>Support:</p> <ul style="list-style-type: none"> <li>• Welcome and support the recognition within paragraph 30.8 that it is proposed to construct the Wyre Forest Emergency Services Hub on part of the former Romwire site.</li> </ul>	<p>Support is noted. Planning approval is now in place for the Emergency Hub</p>
FPH/25 - Rear of Vale Industrial Estate	<p>Comments:</p> <ul style="list-style-type: none"> <li>• There is some adjacent vacant land at the north end of the sewage works whose inclusion in the development should be encouraged.</li> <li>• It needs to be bear in mind that this site did not form part of the outline approval of the British Sugar site and as such the wider surface water drainage strategy agreed for this site has not taken this site into account.</li> </ul>	<p>It is no longer proposed to allocate this site for employment use as there are biodiversity issues which cannot easily be mitigated for.</p>
OC/11 – Stourminster School site	<p>Objections:</p> <ul style="list-style-type: none"> <li>• Will impact on open space, sport and recreation facilities and sites could be lost if allocated prior to being informed by the built and playing field strategies.</li> <li>• Playing fields on site will be subject to para.74 of NPPF</li> <li>• No amenities to support development on such a large scale.</li> </ul>	<p>This site does not include any of the playing fields which are being retained for use by the schools on Borrington Road. Pedestrian links from the site through to the neighbouring site will be encouraged.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 30: KIDDERMINSTER TOWN

Site	Key Issues Raised	WFDC Officer Comments
WFR/WC/18 – Sion Hill School site	<p>Comments:</p> <ul style="list-style-type: none"> <li>A point of major disquiet, it has become a focus for anti-social behaviour and thus there is a danger of serious injury. It should be demolished immediately.</li> <li>Planning permission has been granted on this site but progress has not been made.</li> </ul> <p>Objections:</p> <ul style="list-style-type: none"> <li>Allocated for 60 dwellings but has permission for 46. Capacity should be reduced to reflect this as already counted as commitment.</li> <li>Will impact on open space, sport and recreation facilities and sites could be lost if allocated prior to being informed by the built and playing field strategies.</li> <li>No amenities to support development on such a large scale.</li> </ul>	<p>Site is now cleared of buildings and a planning application for residential development is expected to be determined shortly.</p> <p>The previous application for 46 dwellings was never fully approved as the S106 agreement was not signed. This proposal only affects the previously developed part of the site and does lead to loss of the playing fields. Part of the playing field is now owned by the primary school.</p>
FPH/1 – Settling Ponds	<p>Support:</p> <ul style="list-style-type: none"> <li>The release of the developable part of this site for housing will not threaten permanence of Green Belt boundary as adjoining land is SSSI or FZ2/3.</li> <li>Site is in suitable and sustainable location especially for housing. In largely residential area with associated facilities, is close to employment areas, is easily accessible to town centre and has strong links to main road network and rail network.</li> </ul> <p>Comments:</p> <ul style="list-style-type: none"> <li>Site is totally inappropriate to this area, lying adjacent to the nationally important SSSI and nature reserve. This area should again be retained as a buffer between development and the relatively rare and protected marshland habitat.</li> <li>Adjacent to some of our District's most valuable wildlife areas. There is a real risk of increasing disturbance pressure on these sensitive areas.</li> <li>Site will be subject to current planning regulation and biodiversity concerns will make development more complicated and may even restrict the nature available developable area. Need to maintain buffer between development and SSSI but should be possible to make some land available.</li> </ul>	<p>This site is not proposed for release from the Green Belt due to impact on adjacent SSSI. See site selection paper and sustainability appraisal</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 30: KIDDERMINSTER TOWN

Site	Key Issues Raised	WFDC Officer Comments
	<p>Objections:</p> <ul style="list-style-type: none"> <li>• The land is an important and valuable local urban wildlife asset, home to many toads, frogs, polecats and protected species such as otter and great crested newt use the lagoons.</li> <li>• Domestic/industrial activity would destroy the Marsh, which is also a flood plain.</li> <li>• Already traffic congestion in area; further housing could bring the whole of North/South traffic to a standstill.</li> <li>• Needs to demonstrate exceptional circumstances. Green Belt assessment advises there is an absence of defensible boundaries at this location. Need evidence before it can be allocated.</li> <li>• Development here will lead to unacceptable adverse impacts on the adjacent SSSI and the Wilden Marsh Nature Reserve.</li> <li>• It is essential to recognise that the council has a statutory duty to take steps to protect and where possible enhance the SSSI under the Wildlife and Countryside Act 1981 (as amended) and we cannot see how this duty can be discharged in light of the significant effects anticipated.</li> <li>• It would be devastating to the local area to allow all natural land to be consumed by housing or industry.</li> <li>• The road itself cannot possibly support any more traffic at either end as well as the fact that cars race down Wilden lane in parts and more traffic would likely cause more accidents and danger to pedestrians, cyclists and residents.</li> <li>• This is a valuable asset to the local area which will be seriously disrupted in the event of erection of housing or light industrial areas.</li> <li>• This pocket of land should be gifted to the Worcestershire Wildlife Trust</li> <li>• The land is an important valuable local wildlife asset.</li> <li>• This site "feeds" the SSSI site and use for industrial housing will have a long term effect on flora and fauna. Additionally the infrastructure and access to the site is insufficient to support any increase in traffic flow along Wilden Lane towards Kidderminster.</li> <li>• No constructive evidence why the "settling ponds" need to be developed for housing.</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 30: KIDDERMINSTER TOWN

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• Not sure but this area thought to be possibly contaminated. Surely drainage issues exist as well.</li> <li>• There has already been a major development on the western side of the SSSI, with the large Silverwoods residential and industrial estate. A development to the east of the SSSI would squeeze the green corridor to an impossible degree, inevitably causing the existing wildlife occupying the site to be disturbed and frightened away.</li> <li>• The Settling Lagoons should be added to the existing SSSI in order to provide a more realistic nature reserve</li> <li>• Surely the pre-eminent principle is supposed to be that any development should not adversely affect a SSSI and this would inevitably be the case if any development was to take place upon this site.</li> <li>• There are countless brownfield sites in Kidderminster which should be developed first.</li> <li>• Site currently acts as a buffer between a busy road and a SSSI.</li> </ul>	
General Comments	<ul style="list-style-type: none"> <li>• King Charles 1 School is satisfied there is sufficient capacity to deal with the effects of both options.</li> <li>• There is a need to determine any ecological constraints using up to date survey information.</li> <li>• Concerned that the schools and doctors will not be able to cope.</li> <li>• How will water/sewage disposal for 5400 households be provided?</li> <li>• Bring empty houses back into use.</li> <li>• The hospital is already inadequate and new school places would be needed.</li> <li>• Kidderminster has 'zoned' parts of the town centre for commercial development which is just not happening.</li> <li>• Supports the idea that people should live in town centres. It makes sense to use the unused space over shops and business premises for housing</li> <li>• Horsefair shopping street is a disgrace to look at especially as an entry/exit portal to and from Kidderminster</li> </ul>	<p>Proposals include land for 2 additional 2-form primary schools. Community buildings are also proposed which could potentially house GP surgeries subject to NHS requirements.</p> <p>The Water Cycle Study has been undertaken by specialist consultants and looks at future water supply and sewage disposal capacity. The district council is working hard to bring empty homes back into use and has officers tackling this issue.</p> <p>Horsefair – proposals for new link road will enable this area to become one-way. Local community groups are helping to spruce up buildings throughout the area.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
WFR/WC/15- Lea Castle Hospital	<ul style="list-style-type: none"> <li>• Supports the inclusion of the Lea Castle Hospital site as a proposed allocation for 600 dwellings.</li> <li>• 1.96ha or employment land on the site. This should be re-worded to be around 1.2ha</li> <li>• Is inappropriate for it to remain derelict but its boundaries re too widely drawn. Talbots Hill Coppice should be retained. Shelter belts which screen site should be retained and adjacent land should be planted up.</li> <li>• Undeveloped land in centre should be retained as a park.</li> <li>• Sports field should be retained and field to south should be excluded to retain gap between Kidderminster and Lea Castle.</li> <li>• Village centre facilities should be at centre of site not southern gateway.</li> <li>• Road junctions need amending on A451.</li> <li>• Impacts on biodiversity at Lea Castle site as it has a large amount of rare and protected biodiversity on site.</li> <li>• Infrastructure doesn't exist to support 600 dwellings at Lea Castle.</li> <li>• Cookley is not an extension of Kidderminster and it should not be developed as such.</li> <li>• 300 care home places could be accommodated and would make sense. The care home would provide employment for local residents.</li> <li>• Development of the Lea Castle site is needed but must be done sensitively to support local infrastructure/need unlike current plans.</li> <li>• The access onto two very busy main roads will need careful consideration.</li> <li>• Infrastructure is already stretched to full capacity, with the A449 already an accident hot spot.</li> <li>• No reason for development to remove trees, woodlands or wild life habitats in the name of progress.</li> <li>• Support re-use of Lea Castle but only if a sustainable settlement is created. Otherwise this will impact adversely on neighbouring areas.</li> <li>• Cookley School has already been extended and is at capacity. Medical facilities are stretched.</li> </ul>	Site has outline planning approval for up to 600 dwellings subject to S106 agreement.

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• Planning approval has already been given approval.</li> <li>• The current plans allow for no additional facilities such as doctors surgeries or schools and would place a huge burden on Cookley's resources.</li> <li>• Where is evidence that site has been marketed as mixed use led scheme? It is inappropriate for site status to be changed. This allocation is inappropriate.</li> <li>• Unsustainable since it lacks viable access for all people.</li> <li>• Impact on Cookley village facilities.</li> <li>• The proposal will blight the village's attractiveness.</li> <li>• Would effectively link Cookley to Kidderminster making it an extension of Kidderminster.</li> <li>• As a separate village Cookley should be allowed to expand in line with its own needs.</li> <li>• Cookley is a village. It is not an extension of Kidderminster and it should not be sacrificed to support Kidderminster's needs.</li> <li>• In order to meet lower Co2 targets the plan should be promoting centralised housing development that reduces the dependency on car traffic.</li> <li>• How will Cookley be Inset Green Belt when southern Green Belt is removed?</li> <li>• There are brown field sites not on plan.</li> <li>• The junction of the A449 and Castle Road, Cookley is extremely busy.</li> <li>• Cookley is referred to as an urban extension of Kidderminster, it is not, it is a village. As a separate village it should be allowed to expand in line with its own needs.</li> <li>• Cookley should not end up as part of Kidderminster.</li> <li>• The loss of farmland and threats to the natural habitat. In addition to the devastating environmental impact of this loss, the potential detriment to the health and wellbeing of the residents of Cookley should not be underestimated.</li> <li>• Loss of village identity/infrastructure concerns.</li> <li>• The scale of the suggested development of both options A and B reach far beyond the footprint of the former Lea Castle hospital site.</li> <li>• The Infrastructure in, and surrounding, Cookley is inadequate for such a large</li> </ul>	



## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>scale development.</p> <ul style="list-style-type: none"> <li>Do not object to some development on Lea Castle but it needs to be done sympathetically with good infrastructure.</li> <li>Increase in traffic in and around our quiet village.</li> <li>Support for development of a new community on the Lea Castle Hospital and School brownfield site, provided that consideration is given to the local environment and ecosystems; is built with good housing principles; the local community is fully engaged with planning the development and infrastructure, such as transport, schools and GPs are provided.</li> <li>It will not have a negative impact upon the landscape character.</li> </ul>	
BW/4 - Hurcott ADR	<ul style="list-style-type: none"> <li>Accept that we need more family-sized semis but also need to provide for ageing population.</li> <li>Site will be subject to current planning regulation and biodiversity concerns will make development more complicated and may even restrict the nature available developable area.</li> <li>314 dwellings could be provided at 35 dwellings per hectare.</li> <li>200 dwellings is too low, the site should be allocated for at least 300 dwellings.</li> <li>The whole site BW/4 should be master planned as one complete site and this would allow for the most efficient layout to be achieved.</li> <li>Would have a devastating effect on the traffic using Hurcott Lane which is currently a rat-run between the Birmingham and Stourbridge roads.</li> <li>Clearly visible from Stourbridge Road, and forms a vital part of the visual landscape. Development would be detrimental to visual landscape.</li> <li>Good quality (Grade 3a) agricultural land.</li> <li>Too close to Podmore Pool and Hurcott Pool SSSI.</li> <li>A new survey should be carried out to determine the present diversity of bird life.</li> <li>An up-to-date survey of flora, fauna and insect life should be carried out to determine the biodiversity in the SSSI, the Nature Reserve and surroundings.</li> <li>It will cause urban drift in the merging of Kidderminster with Hurcott Village.</li> </ul>	<p>The parcel to the north of the dry valley has planning approval for 91 dwellings and Miller Homes are expected to start on site shortly.</p> <p>The southern parcel is proposed to remain as an undeveloped 'green gap' as development here would have an adverse impact on the adjoining SSSIs, the setting of the historic settlement of Hurcott and access would be unworkable. It is proposed to close off Hurcott Lane to through traffic and any additional traffic from development on the southern parcel would have an adverse impact on this historic lane and its sandstone cuttings. Site access would not be acceptable from Hurcott Lane. Access from the northern parcel would require a raised bridge across the 'dry' valley. This would have an unacceptable impact on the landscape.</p> <p>The proposal to reopen the footpath link</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• Traffic at Hurcott Lane should be limited by a one way system.</li> <li>• Any development behind Kendlewood Road should be conducted sympathetically.</li> <li>• Any access should be limited to Stourbridge Road.</li> <li>• The bridle path between Hurcott Road and Hurcott Lane must be preserved.</li> <li>• All trees within the proposed site should be preserved.</li> <li>• The character of this little village will be destroyed.</li> <li>• The greater the access the more unwanted criminal activity will arise.</li> <li>• The junction will not cope with the extra traffic.</li> <li>• The intrusion of more people and a pathway/cycle path from the housing estate to Broadwaters Park will destroy the SSSI.</li> <li>• The cycle path and walkway will also provide a big security risk for houses backing onto the land at the rear of the Kendlewood Road.</li> <li>• Infrastructure needs to be upsized to cope with the extra population.</li> <li>• Whatever development is proposed for Kidderminster the dangerous junction between Hurcott Lane and the A456 and the weak road bridge at Hurcott Pool Reservoir need addressing.</li> <li>• The Council might also want to consider cutting off Hurcott Road at the point where it narrows to a single track road, improving the amenity access to Hurcott Nature Reserve for pedestrians, cyclists and horses.</li> <li>• The proposed core development would engulf is Hurcott Village</li> <li>• The village is of historic and scientific interest, being developed on a site that is regarded as one of the oldest sites in British papermaking dating back to the middle ages.</li> <li>• There are regular incidents and accidents as a consequence of increased traffic from drivers using it as a cut-through from Stourbridge Road to Birmingham Road.</li> <li>• The village is wholly residential; there are no shops and no pub and the road should only serve residents and those visiting the woods.</li> <li>• The village is currently crime-free and - with no street lighting - free of light</li> </ul>	<p>from Hurcott Village would have an adverse impact on the SSSI. Worcestershire County Council is still considering this footpath proposal.</p> <p>The SSSI must be kept free of public access as it is very sensitive. (see Ecological assessment report in Evidence Base)</p> <p>The northern site has been design so that a wide natural buffer of wildflower meadow planting is provided along the southern edge adjacent to the 'dry' valley.</p> <p>Pedestrian access into Broadwaters will be provided along Stourbridge Road itself.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p data-bbox="562 268 680 292">pollution.</p> <ul style="list-style-type: none"> <li data-bbox="517 304 1509 368">• The Hurcott Road is small, busy and dangerous as it is and would not be able to cope with that amount of travellers coming up and down.</li> <li data-bbox="517 376 1429 400">• The current plan for the strip next to the Stourbridge Road is far enough.</li> <li data-bbox="517 408 1509 512">• I do not believe the infrastructure of roads, amenities, schools and is enough to support such a development and would suffer causing major disruption and disadvantage to the existing residents.</li> <li data-bbox="517 520 1070 544">• Development would also reduce openness</li> <li data-bbox="517 552 1458 576">• Hurcott Village is an ancient settlement, mentioned in the Domesday Book.</li> <li data-bbox="517 584 1491 655">• There is no mention in the plan of infrastructure to support the developments either side of the village.</li> <li data-bbox="517 663 1480 727">• Policy 26 A and B - The proposals would not protect the historic environment with regard to Hurcott Village.</li> <li data-bbox="517 735 1469 839">• There are a large number of brownfield sites in the Wyre Forest, particularly Kidderminster, which either do not appear in the plan or show absolutely no signs of development.</li> <li data-bbox="517 847 1518 943">• The vehicle pollution emissions and noise levels are already unbearable, with excessive speeds and the increase of HGV's which have caused unsightly passing places and in turn are dumping grounds for fly tippers.</li> <li data-bbox="517 951 1532 1015">• It is unsafe for pedestrians and cyclists to venture into the village. This lane needs protecting and preserving now.</li> <li data-bbox="517 1023 1122 1046">• Stop traffic flows in Hurcott before it's too late.</li> <li data-bbox="517 1054 1469 1118">• Better utilise unoccupied commercial buildings and existing brownfield sites firstly, rather than destroying areas of outstanding beauty.</li> <li data-bbox="517 1126 1391 1150">• Both the A449 and A451 head to the bottle neck that is the Horsefair.</li> <li data-bbox="517 1158 1491 1222">• Any development of this traditional land with hedgerows and fields is found to impact negatively in the wildlife habitats.</li> <li data-bbox="517 1230 1532 1334">• The access and highways infrastructure would not cope with the additional traffic and some cosmetic changes, additional visibility splays and traffic lights will not do anything to help this.</li> <li data-bbox="517 1342 1518 1366">• Would cause impossible traffic situations for Hurcott Lane and Hurcott Road. No</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>traffic count or accident details can illustrate the reality of the dangers for motorists or pedestrians on these routes.</p> <ul style="list-style-type: none"> <li>• The reality of no pavement and safe pedestrian access along Hurcott Lane to the Nature Reserve needs to be a priority and the volume of traffic restricted.</li> <li>• We have monitored the traffic in the Hurcott area. Much is from non residents travelling to the West Midlands.</li> <li>• Do we need another 20,000 residents?</li> <li>• Character of the village will be lost.</li> <li>• Hurcott needs to be made into a cul-de-sac anyway to stop the erosion, dangerous speeds, accidents, volume of traffic and air pollution.</li> <li>• The fumes from all these vehicles is bad due to the village being in almost the lowest dip of the valley, therefore not dispersing. Many front doors are just a few feet from the road itself and the speed of the traffic is frightening, never mind the noise.</li> <li>• Traffic problems in Hurcott with additional cars - horse riding has stopped, accidents have happened.</li> <li>• This area should be left alone for natural wildlife.</li> <li>• The proposed extensions, in one area are unfair to local residents causing a new bottle neck to the entry of Kidderminster.</li> <li>• Current road layouts are not suited for the extra traffic and would need significant alteration to safely incorporate another estate</li> <li>• (BW/4) incorporating the dry valley has the potential to significantly modify the drainage characteristics of the area and development here has the potential to have a significant harm upon the Hurcott Pasture SSSI and the adjacent Hurcott and Podmore Pools SSSI, adversely affecting their unique setting.</li> <li>• Development of site BW/4 would make the appropriate management of the SSSI to maintain its ecological interest difficult.</li> <li>• There is no evidence of an applied buffer zone to the SSSIs as the site assessment report indicated would be required.</li> <li>• Hurcott Lane is a single carriageway with vehicle forced passing places over steep grass verge with in part restricted visibility.</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>I do not believe development of either Hurcott site would offer any benefit to the people of Kidderminster. It would most likely comprise of expensive housing which the majority within the area could not afford with a token of affordable housing.</li> <li>The Local Plan predominantly concentrates proposed development along a wide eastern corridor. Is this not disproportionate?</li> <li>It is entirely appropriate for this ADR site to be allocated as a Core Site</li> <li>SHLAA panel considered that this ADR may be suitable for housing (up to 250 dwellings) if greenfield land releases are required at the end of the plan period.</li> <li>There is no need to remove the site from the Green Belt.</li> <li>Deliverable within the next 5 years.</li> <li>Frontage to the A451 Stourbridge Road, which is an existing bus route.</li> <li>The ecological features of most interest are located around the boundaries of the site, which can be retained and enhanced.</li> <li>The wider area of Site BW/4 also offers potential for green infrastructure connectivity through to Broadwaters Park / Podmore Pool and the facilities and amenities in Broadwaters.</li> <li>It amounts to about 14 hectares of poor quality agricultural land.</li> <li>Overall, its development would not significantly harm the purposes of the Green Belt.</li> <li>The Inspectors Report 2003 considered whether there were any exceptional circumstances to return the land to Green Belt. No exceptional circumstances were justified and the site was not needed for development at that time such that it remained as ADR.</li> </ul>	
OC/4 - Rear of Baldwin Road	<ul style="list-style-type: none"> <li>Concern to the integrity of Hurcott Village.</li> <li>Any access should be limited to Birmingham Road and Stourbridge Road.</li> <li>The bridle path between Hurcott Road and Hurcott Lane must be preserved.</li> <li>Area between Podmore Pool and Hurcott Pool is an important wildlife corridor.</li> <li>All trees within the proposed site should be preserved.</li> <li>The road structure is ridiculously inadequate for this type of development.</li> <li>Too close to the SSSI.</li> </ul>	This land is not proposed for allocation in the Local Plan owing to adverse impact on SSSIs, setting of Hurcott Village and landscape impact of building beyond the ridgeline opposite Husum Way.

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• Height of this land will make the western approach (A456) to the WF very unattractive.</li> <li>• There is also the issue of whether the road bridge on Hurcott Lane could support any material increase in traffic.</li> <li>• Put bollards across the road adjacent to the access to the Hurcott Nature Reserve, thereby allowing vehicle access to the Nature Reserve from both the Stourbridge Road and the Birmingham Road, but preventing through traffic.</li> <li>• Development would spoil our main approach along the A456 completely. Endangered species in this area, the skylarks, owl, hedgehogs, bats and the plethora of beautiful small birds.</li> <li>• Retain and preserve as much nature, flora and fauna as we possibly can.</li> <li>• Building on it would be contrary to County Green Belt policy.</li> <li>• 450 dwellings on this site would also have a devastating effect on the traffic using Hurcott Lane.</li> <li>• Increasing vehicular access will further reduce pedestrian safety.</li> <li>• Visual impact on the landscape resulting in an urban rather than rural approach to Kidderminster.</li> <li>• Good quality (Grade 3a) agricultural land.</li> <li>• An up-to-date survey of flora, fauna and insect life should be carried out to determine the biodiversity in the SSSI, the Nature Reserve and surroundings.</li> <li>• Merging of Kidderminster with Hurcott Village.</li> <li>• Developments either side of Hurcott village would completely change this hamlet.</li> <li>• The Green Belt to the east of Kidderminster is vital in separating the town from the West Midlands conurbation.</li> <li>• The development would not be a sustainable community.</li> <li>• The fields are regularly used - and have been for 30 years or more.</li> <li>• Offmore primary school is ready full.</li> <li>• Birmingham Road already accident blackspot.</li> <li>• Brownfield sites should be used as they are more appropriate and are available.</li> <li>• Used by walkers, dog walkers and people wanting to run/exercise in an unspoilt</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>green area.</p> <ul style="list-style-type: none"> <li>• The land is Green Belt and should remain so.</li> <li>• Linear development along the A456 towards Blakedown and Hagley will negate one of the purposes of Green Belt policy.</li> <li>• Development will lead to increased traffic congestion and the inevitable increase in resulting accidents.</li> <li>• This site is the main entry to the town approaching from the north and east. The proposed building work would be an urbanised eyesore for anyone driving into the town this way.</li> <li>• Current infrastructure cannot support suggested numbers.</li> <li>• It will tower over houses on Baldwin Road.</li> <li>• Future generations will judge us by the decisions we have taken.</li> <li>• We consider a plan to develop this area for housing as inconsiderate, inappropriate, short sighted and piecemeal.</li> <li>• Noise and air pollution due to increased traffic on the roads around Greenhill and Broadwaters.</li> <li>• Pressure on local amenities (play areas, schools, shops, etc).</li> <li>• Pressure on public transport, since the proposed sites are too far from the town centre and secondary schools to access by walking.</li> <li>• Increase of pedestrians (in particular children accessing Offmore primary) - there would need to be provision of a suitable crossing.</li> <li>• Detrimental impact on our wellbeing and our house prices.</li> <li>• Road Safety/Road access – Problem for over 20 years - Baldwin Road used as a rat run, excessive traffic as the Birmingham Road and the Land Oak junction cannot cope.</li> <li>• GP surgeries are struggling to cope with existing patients</li> <li>• Loss of views and amenity / recreation space for local residents.</li> <li>• What benefits this proposed development would bring to the area?</li> <li>• Baldwin Road is already used as a rat run to avoid congestion at the Land Oak traffic lights.</li> <li>• Unsustainable. The only facilities on this side of town include a public house a</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>garage and a small convenience store.</p> <ul style="list-style-type: none"> <li>• Threats to public rights of way.</li> <li>• Would not support a new bus route.</li> <li>• Reduction in property value.</li> <li>• Interruption of rural outlook.</li> <li>• Removal of privacy.</li> <li>• Light reduction.</li> <li>• Additional noise.</li> <li>• Disruption throughout development.</li> <li>• Removal of leisure facilities.</li> <li>• Employment opportunities.</li> <li>• New services costs.</li> <li>• Access</li> <li>• Contrary to the wording used within the plan – extending the town will make Kidderminster a LESS desirable place to live.</li> <li>• Wyre Forest should not allow construction of housing if existing routes and a valued Nature Reserve are compromised and made increasingly unsafe.</li> <li>• Were told no new houses were to be built in the area.</li> <li>• Kidderminster’s boundary would be moving nearer to Blakedown.</li> <li>• Loss of amenity and loss of privacy.</li> <li>• The Greenhill district of Kidderminster was developed with no common land or park areas. The local populace have used the land at the rear of Baldwin Road for general recreational purposes including walking/dog walking, picnics and educational walks for children.</li> <li>• This Green Belt area also allows for some fantastic views of the Clent Hills.</li> <li>• Additional building will add to flood risk.</li> <li>• Would like an assessment of capacity of A456 through Blakedown.</li> <li>• Agrees with the Offmore Comberton Action Group.</li> <li>• Baldwin Road is one of the highest points in Kidderminster and housing development here will have a huge visual impact from a wide area.</li> <li>• Green Belt Site clearly makes positive contribution to openness of Green Belt.</li> </ul>	



## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>However, boundary to rear of gardens in Baldwin Road is not robust as some gardens have been 'extended'.</p> <ul style="list-style-type: none"> <li>• Site is well located on edge of Kidderminster.</li> <li>• Considered to be sustainable location and most logical area to release from Green Belt.</li> <li>• Important that Hurcott Village retains its separate identity. Safe and suitable access can be designed and local support for stopping up of lane.</li> </ul>	
WFR/CB/7 - Land off Birmingham Road	<ul style="list-style-type: none"> <li>• The A456 would require substantial capacity development to deal with the increase in traffic, if this was achieved Husum Way will not cope.</li> <li>• There is currently a high level of wildlife within this area including badgers, foxes, deer and a large variety of birds, including endangered species.</li> <li>• This proposal does not support a sustainable community, does not accommodate a neighbourhood centre and will put pressure on the current Offmore infrastructure and amenities. The Offmore primary school is currently at full capacity and cannot be developed as it is on a restricted site.</li> <li>• Development of this site would be a case of gross sprawl.</li> <li>• Transport links to the motorways involve trucks using the already overloaded A456 though Hagley.</li> <li>• The proposals at Hodge Hill are in conflict with Policy CB16 of the Neighbourhood Plan which provides for the use of existing rather than new buildings.</li> <li>• Hodge Hill Farm is locally listed and access to the site is dangerous.</li> <li>• Impact on highways.</li> <li>• Impact on wildlife.</li> <li>• Loss of good agricultural land.</li> <li>• Loss of and impact on Green Belt.</li> <li>• Loss of amenity.</li> <li>• Noise and air pollution</li> <li>• All industrial/trade units should be kept within the South Kidderminster</li> </ul>	This land is not proposed for allocation. It would extend development out into open countryside along the A456 towards Blakedown.

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>Enterprise Zone.</p> <ul style="list-style-type: none"> <li>• We agree with all 10 "Disadvantages listed on the circular known as "OCAG-LP (Offmore Comberton Action Group-Local Plans).</li> <li>• It represents inappropriate ribbon development of the worse kind in one of the more attractive approaches to Kidderminster</li> <li>• support the sites OC/5 and WFR/CB/7</li> <li>• The site is self-contained/self-governing</li> <li>• Employment uses proposed and its location on the outskirts would assist in keeping traffic off the more limited road network within Kidderminster itself.</li> <li>• Site already has sustainable transport links.</li> </ul>	
OC/ 5 – Husum Way	<ul style="list-style-type: none"> <li>• If Kidderminster is to extend out to Hurcott Lane, it may be appropriate for it to extend out as far on the other side of A456.</li> <li>• Impact on highways.</li> <li>• Impact on wildlife.</li> <li>• Loss of good agricultural land.</li> <li>• Loss of and impact on Green Belt.</li> <li>• Loss of amenity.</li> <li>• Noise and air pollution.</li> <li>• This land is considerably higher than the surrounding so development would be very visible.</li> <li>• The views as you drive into Kidderminster currently help lift the appearance of the area.</li> <li>• The junction on the Birmingham Road onto Husum Way is already very dangerous and proposing to add to the traffic and congestion in that area would be catastrophic.</li> <li>• The houses could also prove difficult for a private developer to sell due to the traffic noise.</li> <li>• Before any building work commences the proposed Eastern By-Pass would need to be constructed.</li> <li>• The proposed Eastern By-Pass would need to extend from the A449</li> </ul>	<p>Part of this site will be required for junction improvements – a 3 arm roundabout is proposed. With planting of a significant landscape buffer along the A456 frontage, limited residential development of up to 30 dwellings is proposed on this site as part of a wider eastern urban extension. This site must be designed to limit the impact on the gateway to Kidderminster and soften the urban edge where it meets the historic Hodge Hill Farm complex.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>Wolverhampton Road all the way to the A449 Worcester Road to be effectual,</p> <ul style="list-style-type: none"> <li>• We would like an assessment of capacity of A456 through Blakedown.</li> <li>• Support the site OC/5.</li> <li>• The site is self-contained with little constraint.</li> <li>• Agricultural field which will have limited ecological value.</li> </ul>	
OC/6 - East of Offmore Farm	<ul style="list-style-type: none"> <li>• It has been demonstrated that the release of the site from the Green Belt would not compromise the five purposes of Green Belt.</li> <li>• The value of our property will be significantly decreased.</li> <li>• The lower field encompasses the Blakeway stream which regularly floods.</li> <li>• Will cause flooding in Offmore and Borington</li> <li>• Badgers and bats which are active are in this area.</li> <li>• With this development we will have gridlock on the existing roads.</li> <li>• Hospital is not capable of covering the new population.</li> <li>• Insufficient GP's.</li> <li>• Insufficient Dental infrastructure.</li> <li>• Insufficient Schools.</li> <li>• There is no satisfactory access to the fields behind Offmore farm (Old People's Home).</li> <li>• At least two different species of woodpecker, frogs and toads, bats, foxes, pheasants and many other bird varieties in these fields as well as other wildlife.</li> <li>• Would be "ribbon development" with no "soul" or shops and school attached to it.</li> <li>• An eastwards extension of the town would be patchy, haphazard development at best and blight on the Green Belt.</li> <li>• Any further intrusion in to the Green Belt risks connecting Kidderminster to Blakedown to Hagley to Halesowen and eventually to the outer suburbs of Birmingham.</li> <li>• Traffic in these areas is already at unacceptable levels and any development would add to the already heavily used rat runs in these areas.</li> <li>• Loss of views and amenity / recreation space for local residents</li> </ul>	<p>This site together with OC/13N is proposed as an urban extension with at least 50% of the overall site given over to open space with significant woodland planting. Planned development will be in the form of a number of character areas with wide swathes of green infrastructure linking through the site. Areas prone to flooding will be kept free of development. Land for a new school will be provided on the site to the south together with a 'community building' which could potentially house a GP surgery and small convenience store. Pedestrian links to the existing Offmore Farm Estate will be provided at Offmore Farm Close. Development will follow the contour lines with extensive planted corridors to form a firm eastern boundary. The development will provide the opportunity for a series of circular walks where there is currently no public access. A community orchard is proposed near to Offmore Farm. This development will be served by a single carriageway estate road (20 mph) which will join Husum Way below the railway bridge and eventually come out onto the</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• If you build hundreds of houses on Green Belt land it will only attract those who will not work in the area but simply commute out of the area.</li> <li>• Some of this is grade 2 agricultural land.</li> <li>• No benefit of putting a road through these fields and building houses.</li> <li>• No room at Offmore Primary and it has been extended to maximum.</li> <li>• Tennyson way and Husum way are already used rat runs</li> <li>• Does not believe that any meaningful communities will be created by developing to the east of Offmore.</li> <li>• Additional pressure on Offmore Primary School which is on a restricted site.</li> <li>• Noise and air pollution would increase substantially.</li> <li>• Traffic congestion.</li> <li>• Other sites more suitable.</li> <li>• We are expected to accept that one of these options is inevitable</li> <li>• The fact that councils are being given the green light to remove the protected status of such areas is wrong in principle.</li> <li>• This farmed land is a key aspect of the local environment. Changing the use of this land would be wrong on historical, political and environmental levels.</li> <li>• We do NOT want an Eastern relief road with the resulting disruption, noise, pollution, corrosion of local character and damage to the environment.</li> <li>• Developing the Eastern side of the town will adversely affect the lives of thousands.</li> <li>• Dispersal is preferable to extending an already busy town.</li> <li>• The Green Belt area to the east of Kidderminster plays a vital part in separating the town from the West Midlands Conurbation.</li> <li>• There are anti social behaviour issues that need sorting on Offmore. Adding more houses is likely to worsen the issue.</li> <li>• The local bus service doesn't properly serve the existing community.</li> <li>• There are many speeding cars on Tennyson Way during the evenings; this will only become busier with more housing and cars.</li> <li>• You are proposing to build more houses that we don't seem to need.</li> </ul>	Comberton Road/Spennells Valley Road roundabout.

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• To centralise all the current development plans to one area of the town seems very unfair.</li> <li>• Far more suitable and sustainable options for future development in the area.</li> <li>• It is important for wildlife.</li> <li>• It would have no neighbourhood centre.</li> <li>• This land also has a habit of flooding and water run-off would be increased with building on these fields.</li> <li>• Will ruin the countryside.</li> <li>• Consideration should be given to the effect of flooding of the stream which flows from the eastern direction and along the edge of the Offmore estate towards Spennells.</li> <li>• If development here goes ahead we ask that the unique nature of the Offmore Court development is respected and an area of undeveloped land should be allowed to remain around the development.</li> <li>• This will affect many things i.e. doctors, more pressure on hospitals, dentists, schools too.</li> <li>• Object to OC/6.</li> <li>• There are many species of birds in this area and a number on the BTO/RSPB red list. There's also plenty of other wildlife around including great crested newts.</li> <li>• There is no immediate road access to the rear of Prior Close.</li> <li>• We do not wish to become the Wyre Forest District of Birmingham or the West Midlands.</li> <li>• A bypass would need to be developed before the land to the east of Offmore could be developed.</li> <li>• Question whether the linear development would create any degree of community and social cohesion.</li> <li>• Would like an assessment of capacity of A456 through Blakedown.</li> <li>• Proposed eastern relief road would add further pressure to A456 in village. If A448/A450 junction was improved it would divert traffic from centre of Kidderminster and relieve pressure on A456.</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>It is promoted as an infrastructure led residential development with significant green infrastructure, plus land for a primary school and other community facilities. It also provides opportunity for strategic relief road around eastern Kidderminster.</li> <li>Analysis of evidence base and technical information shows that urban extension is soundly based.</li> </ul>	
OC/12 - Comberton Lodge Nursery	<ul style="list-style-type: none"> <li>Its got a high flood risk. Building here blocks off the wild life access into / out of the Spennells Valley nature reserves.</li> </ul>	It is proposed to allocate this site for up to 10 dwellings. Development will be kept to the centre of the site with the Hoo Brook and its flood plain buffered from built development by a substantial green buffer. The extensive tree belt will be kept along the A448 to maintain the rural feel of the entrance to Kidderminster.
OC/13(N) - Stone Hill North	<ul style="list-style-type: none"> <li>Ridge between Stanklyn and Bell Brooks should be kept open as green wedge. Grade 2 areas should not be developed. Some of northern part is marsh. Irrigation system dating from 17th century. Area to south of Spennells is part of former Stone Common and Hoo Farm. This is grade 2 and should not be used for housing.</li> <li>Building on parts of the flood plain.</li> <li>Building here will disrupt the east west flow of wild life along Hoo Brook.</li> <li>The northern area is promoted as an infrastructure led residential development with significant green infrastructure, plus land for a primary school and other community facilities.</li> <li>Analysis of evidence base and technical information shows that urban extension is soundly based.</li> </ul>	This site is proposed for allocation as a sustainable urban extension for housing, new school, community facilities and extensive areas of open space including a new linear wetland nature reserve together with an extensive network of footpaths/cycle ways.
WFR/CB/7, OC/5/6/12/13N - East of Offmore	<ul style="list-style-type: none"> <li>Agrees with the Offmore Comberton Action Group.</li> <li>Green Belt development should be the last resort.</li> <li>Look at potential for residential development in the town.</li> <li>We have no industry to attract extra people to need the housing.</li> <li>How will surrounding roads of Hurcott cope with double-triple the amount of</li> </ul>	Land at WFR/CB/7 is not being taken forward for employment development as development here would severely encroach into open countryside between Kidderminster and Blakedown. The other

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>cars to houses?</p> <ul style="list-style-type: none"> <li>• How will doctors and schools cope?</li> <li>• Lack of infrastructure - hard to exit estate due to volume of traffic on Birmingham Road; crossing is a death trap.</li> <li>• Local school is already full which cannot be extended.</li> <li>• Kidderminster has no A&amp;E and Worcester is in special measures - these services will be overwhelmed by these proposals.</li> <li>• The eastern by-pass and railway bridges are unlikely to be built due to expense.</li> <li>• The Green Belt land is vital for separating Kidderminster from the West Midlands Conurbation.</li> <li>• Wildlife habitats are on this land.</li> <li>• Lea Castle site is a much better proposal.</li> <li>• Propose development on the north/west of Kidderminster and in Stourport/Bewdley as there are areas which could be developed here.</li> <li>• If development is to take place in Green Belt land in the east of Kidderminster a new park is needed.</li> <li>• There should be multiple off road parking spaces to the rear of the new properties to avoid the roads being crammed with cars.</li> <li>• Development on the east side of Kidderminster running from Cookley down to Offmore would not appear to address the core policies of the Local Plan Review (Sections 6 to 11) in encouraging the growth of Wyre Forest with Kidderminster at its centre.</li> <li>• Would not attract a younger population into the centre of the town but encourage the corridor of growth along the A456 and A451 for commuters to Birmingham and Stourbridge.</li> <li>• Bus services along Birmingham Road and Stourbridge Road are infrequent and unreliable.</li> <li>• Developing semi-rural sites would be detrimental for the district, destroying open spaces and ruining the approaches to the town from the east which are currently green and inviting.</li> </ul>	<p>site are proposed for allocation for a development of around 1440 dwellings in total set within an extensive green space with less than 50% of the site developed. A linear wetland nature reserve will run along the boundary between the existing and proposed developments.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• It is not clear how some areas have been declared 'Core' and some as options (A and B).</li> <li>• Logical to include extra communal areas in development adjacent to existing areas with poor provision or areas that will increase in the number of residents.</li> <li>• Before any building work commences the proposed Eastern By-Pass would need to be constructed along with the required and very expensive railway crossing / bridge.</li> <li>• The proposed housing together with the By-Pass itself would be in an elevated position making them very visible and obtrusive.</li> <li>• This ribbon development is not sustainable or a community and an alternative proposal needs to be considered.</li> <li>• Masterplans will be required for each of these allocations.</li> <li>• High quality farmland.</li> <li>• Loss of about 2½ % of Green Belt.</li> <li>• Husum Way railway bridge is neither big nor strong enough to support the extra traffic from the proposed Offmore development.</li> <li>• There would be more air pollution and more flood water as a consequence of more housing.</li> <li>• Husum Way already floods regularly when there is a prolonged period of heavy rain.</li> <li>• The junction at the A456 Birmingham Road and Husum Way is a dangerous road crossing owing to the volume of traffic to and from Birmingham.</li> <li>• No comprehensive assessments have been undertaken of the entire allocation and the impact its release as a whole would have on the development of the Green Belt. The Green Belt assessment is flawed in this regard.</li> <li>• It is questionable whether such a large allocation could be built out in the Plan period.</li> <li>• The market could not sustain this number of sales in such a small area. The capacity during the plan period should be greatly reduced by at least 50%.</li> <li>• There should be a presumption that major future development should have the</li> </ul>	



## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>aim of creating sustainable communities of a size capable of supporting, at least, its own Primary School, village centre with shops and community facilities, if possible some live work units and adequate recreational facilities, and not simply be an ‘add on’ to existing communities.</p> <ul style="list-style-type: none"> <li>• The land in question is Grade 2 Agricultural Land.</li> <li>• There are endangered bird species: Corn Buntings, Yellow Hammers, Skylarks and Lapwings are present in this land and along the route the “by pass “would have to take from the A456 to the A449.</li> <li>• Eastern bypass: <ul style="list-style-type: none"> <li>○ Would have to be built from the Wolverhampton Rd to the Worcester Rd to be of any use as anything shorter would cause roads around Hurcott Rd/ Birmingham Rd. to be used as rat runs.</li> <li>○ Would be needed <u>before</u> land to the east of Offmore could be developed.</li> <li>○ Would need at least one and probably two new Railway Bridges. These are incredibly expensive and no private developer would pay for them.</li> <li>○ The elevated position would need at least a 30m tree screen separating it from housing to buffer against traffic noise.</li> </ul> </li> <li>• Drainage of the land to the rear of the existing Offmore estate is extremely poor.</li> <li>• Adverse Road traffic on already congested road junctions. We need to keep the Green Belt buffer zone at this side of Kidderminster.</li> <li>• Loss of wildlife.</li> <li>• Side roads would be used for rat runs.</li> <li>• Objects until extra infrastructure is sorted i.e. schools, road, and medical facilities.</li> <li>• Do not need industrial development.</li> <li>• The development would need shops/community facilities.</li> <li>• Will create environmental damage.</li> <li>• The development should include home for older couples and single people.</li> <li>• Where have the housing figures for the Kidderminster area been obtained? They</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>do not agree with the projections from the census etc.</p> <ul style="list-style-type: none"> <li>• Development would be a visual incursion and cause noise and pollution.</li> <li>• Heavy rain floods roads at Husum Way/Shakespeare Drive.</li> <li>• Distribute development to allow for natural expansion to reduce the environmental impact.</li> <li>• Industrial development at WFR/CB/7 Hodge Hill - site unattractive to business investment with limited access options, transport links are restricted.</li> <li>• Damage wildlife habitats and affect the air quality/noise levels</li> <li>• Once Green Belt is gone there is no going back.</li> <li>• When we need more land to grow food in the future it won't be there.</li> <li>• Wildlife habitats are under enough pressure -please leave them alone.</li> <li>• Something should be done about Husum Way/Birmingham Road junction before considering more houses being built in and around this immediate area.</li> <li>• If development happens, consideration should be given to existing properties – to be granted a little space rather than housing butting up to existing properties robbing any views that they have of the Clee and Malvern Hills and Worcestershire.</li> <li>• We need more facilities as well as houses.</li> <li>• Too many homes proposed for the eastern boundary; burden should be spread.</li> <li>• Housing on either option A or B will devalue our property.</li> <li>• Building in this area will result in loss of privacy for residents, high visibility, light and noise pollution.</li> <li>• The idea of industrial units between Hodge Hill Farm on the A456 and the farm house near corner of Husum Way simply goes right into the face of current road restrictions made a few years ago to keep traffic in single file and generally slow it down as it approaches Husum Way.</li> <li>• Any green space in or around towns adds great value. It keeps everyone in touch with nature and enhances lives. It should always be preserved.</li> <li>• Proposed development will totally destroy the natural and free outlook we and many others enjoy.</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• The route of the relief road has not even been established.</li> <li>• The proposed buildings would impact greatly on sewage disposal and other services required.</li> <li>• The wellbeing and lifestyle of existing residents would be severely affected.</li> <li>• Would irrevocably destroy the appeal and beauty of the area and bring with it added health, pollution and social problems.</li> <li>• Development would further impact on air quality and is contrary to NPPF para. 109-124.</li> <li>• Do not bulldoze this asset as safeguarding the district's Green Belt preserves its attractiveness to both locals and visitors.</li> <li>• Its unlikely developers would provide sufficient open spaces or parks.</li> <li>• Large sprawling estates increase social isolation, antisocial behaviour and crime rates as acknowledged by the WFIDP.</li> <li>• Policy 6B states locating new development should wherever possible safeguard the open countryside and maintain the openness of the Green Belt.</li> <li>• May be drainage issues with this site, a proper investigation into this should have taken place before the area was allocated.</li> <li>• Can the NHS cope? Kidderminster &amp; Redditch Hospitals have already had great cut backs and Worcester Hospital is regularly pilloried in the press for poor service as it just cannot cope with the demand.</li> <li>• Money is better spent being put into our local hospital and looking after the people who already live in Kidderminster. People will not want to move to the area if we do not first have the services.</li> <li>• It really would destroy this already established area and cause much upset to local residents.</li> <li>• A full survey should be done to identify all of the species which will be destroyed.</li> <li>• The land is used by local residents for health walks and other leisure activities.</li> <li>• There are no jobs for the local population how will the plan provide jobs for additional people?</li> <li>• When purchasing our property the local search did not reveal anything.</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>Houses would tower over the current barns and would cause a reduction in property values.</li> <li>Lives will be blighted by such a carbuncle in such a beautiful part of the Wyre Forest.</li> <li>When/if the development of the fields adjoining Offmore Court takes place we ask that consideration is given to the effect of flooding of the stream which flows from the eastern direction and along the edge of the Offmore estate towards Spennells. When this land is developed there will be significant run-off as the land available for natural drainage will be greatly reduced.</li> <li>Ask that the nature of the Offmore Court development is respected and an area of undeveloped land should be allowed to remain around the development to enable its unique character to be retained and not submerged.</li> <li>The Core housing plan to the east of Kidderminster is on Green Belt, which includes grade 1 &amp; 2 agricultural land, is also used for shooting sports.</li> <li>There is important wooded wetland area, allowed to go to wild bog, adjacent to the stream between OC/13 &amp; OC/6.</li> <li>Why ruin something that is already a very attractive gateway to the town?</li> <li>Husum Way already carries a large amount of school traffic to and from Offmore and Comberton schools and is used as a cut through. Speeding traffic already causes concerns for the children who walk to school.</li> <li>I do not see how expansion to Offmore and surrounding areas is viable.</li> <li>Objections to placing industrial land close to Hodge Hill nursery, right in the middle of countryside when so many alternatives.</li> <li>Do we in Kidderminster really need such a large volume of new housing?</li> <li>The gateway to Kidderminster from the Birmingham side would be totally spoiled.</li> <li>There are endangered bird species along the bypass route.</li> <li>Would not support a new bus route.</li> <li>Must challenge the bulldozing of Green Belt in ill-conceived plans, when brown</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>sites continue to be allowed to lie dormant.</p> <ul style="list-style-type: none"> <li>• Need to find a solution to all the disused properties before embarking on new build.</li> <li>• Health will be compromised by the noise and traffic pollution.</li> <li>• The A456 is a single lane carriageway and would not be able to cope with the proposed industrial development near Hodge Hill Farm.</li> <li>• Will put pressure on the current Offmore infrastructure and amenities.</li> <li>• Have a lovely view of fields - don't want to look at new builds.</li> <li>• Lack of future employment prospects/overall congestion/Traffic emissions.</li> <li>• Many people and families live here and need the open spaces of the Green Belt.</li> <li>• Before embarking on any new development WFDC need to safe guard, improve the environment and social care of the people already living here.</li> <li>• A huge housing estate on the Green Belt which surrounds Offmore would be very detrimental for all.</li> <li>• How would traffic from the proposed development be diverted from Husum Way and what are the plans for Hurcott Lane and Baldwin Road in particular?</li> <li>• Concerned about the industrial development at Hodge Hill and the impact it will have on noise and pollution.</li> <li>• Would start a potential chain of development into Blakedown and other areas.</li> <li>• Development of industrial units by Hodge Hill also bring additional traffic to what is an already extremely busy road.</li> <li>• Loss of recreation space used for health and wellbeing/impact on landscape.</li> <li>• Impact on air quality/ noise.</li> <li>• It will be separate from the existing community because it will require totally separate access/egress, leaving its residents isolated from a community that is on their own doorstep.</li> <li>• Walkways might be incorporated into the design but the simple fact is that human nature will result in traffic movements rather than walking.</li> </ul>	
WFR/ST/1 - Captains	<ul style="list-style-type: none"> <li>• Why was it selected over other proposed sites?</li> </ul>	This site is not proposed for allocation in this

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
& the Lodge	<ul style="list-style-type: none"> <li>• What will happen to the current right of way which runs from the A448 east to west?</li> <li>• Could you give an assurance that any planned development of the Captain's section of WFR/ST/1 would not give vehicular access onto Kittiwake Drive?</li> <li>• Kittiwake Drive is narrow with adverse cambers and I believe is unsuitable to higher vehicular use.</li> <li>• Adjacent to a children's park and increased traffic movements would increase risk to children crossing the road to get to the park.</li> <li>• The foul drainage system would not have been designed to accommodate outflow from an additional housing estate.</li> <li>• What would be the final disposition of Captain's Pool and its fishing rights?</li> <li>• It would also reduce the price and privacy of my house.</li> <li>• The area is quiet and full of nature and wildlife.</li> <li>• Lots of constant noise and traffic especially entering onto the Bromsgrove Road.</li> <li>• Will place more pressure on infrastructure</li> <li>• The sewers in Spennells can barely cope already.</li> <li>• There will be insufficient school places and doctors.</li> <li>• Traffic on Spennells is already a nightmare at peak times- this will make it even worse!</li> <li>• Noise, traffic fumes (increasing risk to health) and access.</li> <li>• Question the need for so many houses.</li> <li>• It would put huge pressure on existing roads, schools, shops, doctors and dentists, the police and hospitals. I do not think that the infrastructure is there to support such a huge growth in population.</li> <li>• Loss of wildlife.</li> <li>• Please amend status of WFR/ST/1 to greenfield not brownfield.</li> <li>• Effect on visual amenity that is Captain's Pool.</li> <li>• Area used by walkers.</li> <li>• Pollution to the pool by way of litter which is harmful to the wildlife.</li> <li>• Current public transport is very poor and needs substantial investment to serve</li> </ul>	<p>local plan. Limited development may still be possible based on existing footprint of development. Key issue is impact on ancient woodland and pools and streams complex which would severely limit the developable area.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>the current population levels let alone increased population.</p> <ul style="list-style-type: none"> <li>• There is no evidence whatsoever that there is a need for this number of units.</li> <li>• Report incorrectly states site has no natural interest.</li> <li>• The fields are teeming with wildlife.</li> <li>• Open Space and PRoW's do not as such feature in our community facilities plans in the detail we would expect.</li> <li>• Major and significant loss of amenity to the residents of Spennells.</li> <li>• Damage the biodiversity of an area it seeks to enhance.</li> <li>• No evidence that the suggested enhanced employment opportunities will be delivered.</li> <li>• The rural nature of Stone Parish will be destroyed.</li> <li>• The Planning Inspectorate refused an appeal to develop the site of Captains on the grounds of Inappropriate Development, Openness, Visual Amenity, Highway Safety and a number of lesser considerations.</li> <li>• The ancient woodland to the south of Captains was badly damaged when there was an attempt to develop the area before any permission had been approved. The woodland should have been returned to its previous form.</li> <li>• Area of Captains site has been infilled and hard packed to provide for caravan storage.</li> <li>• The site has been compromised and should be returned to its previous state in order to preserve the linear landscape.</li> <li>• The massive environmental impact in the face of climate change needs to be considered. I urge you not to allow Wyre Forest Green Belt to be depleted for short term gain.</li> <li>• Poor quality, narrow and speed restricted A448 is already over loaded and congested.</li> <li>• It will destroy the approach into Kidderminster if you develop near Kittiwake Drive and Cardinal Drive and also the area close to Captains Pool.</li> <li>• How will the waters be maintained and who will be responsible for it?</li> <li>• Backs on to a peaceful cul-de-sac and residents are very concerned about access</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>to the houses and the noise problems.</p> <ul style="list-style-type: none"> <li>• Concerned that plans do not specify the type of housing proposed on any of the sites. The council should take the lead in this, rather than be reactive to the developers' plans.</li> <li>• Loss of use of fields &amp; footpaths.</li> <li>• How does the WFDC plan to offset the carbon footprint created by building these houses and the extra cars?</li> <li>• Tree Protection Orders are in force over the Spennells and its surrounding areas.</li> <li>• Development of this area would also be detrimental to the Spennells Nature Reserve.</li> <li>• There is no footpath on the Captains and The Lodge side of the A448 for children to walk safely to Comberton or King Charles schools</li> <li>• There is swamp land at the easterly corner of Captains Pool.</li> <li>• Both Captains and The Lodge contain restrictive agriculture related covenants.</li> <li>• Concern is that if developed without the adjacent area of OC/13 Stone Hill South the only feasible access to this area for construction traffic and residents would be through either Kittiwake Drive or on to the A448 Bromsgrove Road significantly increasing the hazards on either road.</li> <li>• Access on to the A448 from the adjacent area of the existing Spennells estate is explicitly prohibited in the deeds of the Spennells properties precisely because of the hazardous nature of this stretch of road.</li> <li>• Captains Pool is classified as brownfield despite in reality being a field full of plant life, trees, wildlife, etc.</li> <li>• Might possibly be an appropriate extension to the existing developed area, but we would not like to see development further along Bromsgrove Road, so as to maintain a strategic gap between Kidderminster and Stone.</li> <li>• I believe the site to be amongst the least worst, if not the least worst, of all the current Green Belt sites and would wholeheartedly support its reallocation for residential development.</li> <li>• Support for Captains and The Lodge development</li> </ul>	



## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
FPH/27 - Adjacent Easter Park	<ul style="list-style-type: none"> <li>• It offers only a limited contribution to the purposes of Green Belt.</li> <li>• Those already there have never been fully occupied and are an eye sore</li> <li>• Coupled with the empty VOSA building further creating the impression of a run down and economically poor town</li> <li>• Fully support the proposal and the land is available at short notice. Land is currently underutilised and is of low agricultural worth and has little attractive merit.</li> </ul>	This site will be allocated for employment use. Access will be taken from the neighbouring development at Easter Park.
OC/13(S), WFR/ST/2, AS/10 - Spennells fields	<ul style="list-style-type: none"> <li>• Road infrastructure is struggling to support the current residents; more dwellings will have a huge impact on road congestion in these areas.</li> <li>• A through road will not change the roads that are already congested on a daily basis especially at rush hour.</li> <li>• Concerns for road safety, congestion, access to emergency services, air pollution.</li> <li>• Object to any proposed bypass that would increase traffic on the A456.</li> <li>• When will new road be built before or after the houses?</li> <li>• Kidderminster has higher obesity levels than the national average so need fields for exercise.</li> <li>• Extra buses and traffic will cause a safety issue for children in the area.</li> <li>• Will considerably increase the amount of commuters on the rail network to Birmingham and as such cause overcrowding and delays impacting along the train line.</li> <li>• Effect on infrastructure: Schools, doctors, roads, hospitals and bus service are already hugely under pressure.</li> <li>• How do you know that school provision will be delivered?</li> <li>• There is no spare space to extend the existing school.</li> <li>• Crossing the road for school is already hazardous at Captains Pool Road / Heronswood Road / Turnstone Close. More homes would result in more traffic and a worse situation.</li> <li>• Poor access at Turnstone Road - already has to accommodate road traffic from around 150 dwellings</li> </ul>	These sites are not proposed for release from the Green Belt. OC/13S and WFR/ST/2 have biodiversity issues which preclude the sites being released for development.

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• More pressure on Stanklyn lane and its two major junctions.</li> <li>• Stanklyn Lane and the Spennells Est. roads are not fit to cope with the heavy building site traffic. These are already hazardous to turn left from and pose more danger with busier roads.</li> <li>• The new road has badly affected the main road from Worcester and also Wilden Lane.</li> <li>• Spennells Road, Mustow Green and the viaduct roundabout are already blocked solid at rush hour, 2000 plus extra people making their way onto Kidderminster and Birmingham would do nothing for the problem and create a lot of pollution.</li> <li>• Bridge at the top end of Stanklyn lane is very narrow and there has been accidents there, not be suitable for HGV vehicles and extra traffic adding more danger to the situation. Stanklyn lane is only 30 mph at the end, yet cars use it as a cut through to avoid gridlocked roads of the A449 Stone Hill.</li> <li>• Have never been convinced that a relief road would help the congestion in Kidderminster.</li> <li>• The vast majority of the trees on this estate have Tree Preservation Orders on them, they need to be protected.</li> <li>• Many red listed and other species of birds.</li> <li>• Diverse population of mammals. This stretch of land contains 2 pools, woods, a bridle path and public rights of way which in their own rights are protected. Sightings of European otters, 3 species of Bats and badgers setts with breeding pairs.</li> <li>• Fields are used for recreation by horse riders, cyclists, joggers, walkers etc who enjoy the benefits that this beautiful space provides. This interaction is vital for both building community spirit and offering a lifeline to those who do not normally see anyone to talk to.</li> <li>• The area is not wasted space but valuable open space enjoyed and used by not only residents on Spennells but residents from Offmore, Comberton and surrounding areas.</li> <li>• Footpaths that allow walking in the open countryside cannot be equated with 'Green Corridors' between housing developments.</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• The fields are a well used community asset with walkers, dog walkers and cyclists, an amenity which can only be a benefit for physical and mental health of all who use it. That includes families, people of all generations and people of varying physical ability.</li> <li>• It would eventually more than double the size of Spennells. Spennells is already a big estate but it was built with many grassy areas and walkways and is surrounded by the nature reserve, Captains Pool and the fields. Consequently, Spennells has become a pleasant place to live.</li> <li>• Replacing the rural aspect of the town with undesirable buildings and the increased pressure on services and infrastructure will not encourage people to want to live here.</li> <li>• There would be development right up to the district boundary.</li> <li>• Provides a rare opportunity for those that live in the area to enjoy the benefits that the outdoors has to offer. The footpaths are easily accessible to all involved. Are new businesses and enterprises <u>definitely</u> going to be set up in Kidderminster to provide jobs for the new residents?</li> <li>• Spennells fields should not be built on. It should become a SSSI.</li> <li>• Spennells Valley is a nature reserve.</li> <li>• Development will have adverse impact on local global warming and pollution in general. More carbon dioxide will be produced with a loss of trees and green areas that produce oxygen.</li> <li>• Development would join Spennells to Stanklyn Lane. These are two separate communities.</li> <li>• Links between the parish of Stone and the edge of Kidderminster do not need to be made stronger.</li> <li>• Infilling will ruin the character of Spennells and estate development will overwhelm an already large estate.</li> <li>• The proposed site will NOT increase industry and jobs in the area. The Easter Park industrial site still has empty units and there are empty units on Hoo Farm industrial estate.</li> <li>• There is evidence that large estates have increased crime/drug levels.</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• There are no big industries left in Kidderminster therefore jobs are hard to find. Has the M.O.D site at Summerfield been approached - surely there is an exclusion zone there?</li> <li>• Concerned about increase in the amount of light pollution.</li> <li>• Loss of buffer to Easter Park.</li> <li>• Spennells is a really nice place to live and that is because it is surrounded by fields and green spaces.</li> <li>• Massive impact on the environment and local habitats and nature destroyed.</li> <li>• Increase in noise and pollution.</li> <li>• With the future of fossil fuel uncertain I believe that there will come a time when importing food and travel abroad will become extremely expensive.</li> <li>• Residential and industrial development would have a severe detrimental impact on the habitat of the fauna and flora and deface the natural environment.</li> <li>• This area was originally supposed to have a church and a pub. Where are they?</li> <li>• The 'Guidelines for Landscape and Visual Assessment Report' published in 2013 emphasised the need to improve the quantity and quality of publicly accessible open spaces and yet this is something that this Local Plan removes.</li> <li>• Historical drainage ditches in this area of archaeological importance that should be protected and enhanced.</li> <li>• Only in exceptional circumstances may councils alter Green Belt boundaries after consulting local people and submitting the revised Local Plan for examination.</li> <li>• Worcestershire Green Infrastructure Strategy already acknowledges that Worcestershire has a higher than West Midlands average of CO2 emissions due to domestic and transport emissions. Worcestershire's Planning Policy to reduce CO2 emissions by reducing the need to travel is contrary to what is being proposed with this development and does not provide any evidence to show how such proposals contribute to the national objective of reduction in CO2 by 2050.</li> <li>• AS/10 is this within a 600 metre blast zone of the Roxel Summerfield site? The POD does not mention any constraints caused by the proximity to the Roxel site or National Grid electricity power lines.</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• It is common practice for planners to avoid urban development across ridges into valleys, in order to take account of visual intrusion into surrounding countryside. The existing Kidderminster boundary is so screened from Summerfield. Selection of Option A would extend the boundary into the valley occupied by Stanklyn Lane, with the next ridge being a further half mile, or so, away at Shenstone. That visual intrusion could be seen as unacceptable to Summerfield residents, who will quite reasonably wish to perpetuate separation of their village from the town, both physically and visually.</li> <li>• Spennells estate was built adjacent to a golf course and therefore did not impinge on existing housing.</li> <li>• Proposed housing development lies within an area of agricultural land graded as 'very good' by Natural England. Land within this classification represents just 16.6% of agricultural land in Worcestershire. The continuous loss of quality agricultural land will further reduce the ability of the country to become more self-sufficient and to decrease our import bill.</li> <li>• Flood Risk Management: The POD ignores Water Cycle and flooding issues raised by Consultants reports and identified by further research. Development in these areas would have significant impact on infrastructure and are flagged red in the RAG assessment. There are major constraints to provision of infrastructure and/or treatment to serve proposed growth.</li> <li>• These fields land are always been planted with either cereal or in the past sugar beet crops. England will need these fields to grow food for our population.</li> <li>• The field currently acts as a valuable soak away, concerns re new drainage for storm and sewerage. Fields are a good flood plain for soaking away surface water. In heavy rain drives and roads can flood and this would be made worse by the removal of the field.</li> <li>• Threat to existing public Rights of Way.</li> <li>• Green Belt land is in place to stop urban sprawl, what green space will we be left with.</li> <li>• No Green Belt land should be lost unless it can be shown beyond doubt that there's an imperative need which cannot be resolved in any other way. Sajid</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>Javid, Secretary of State for Communities and Local Government, has rather controversially stated that up to 1% of Green Belt land may have to be taken to meet housing needs. It is not acceptable to plan to take up to 2.4%.</p> <ul style="list-style-type: none"> <li>Plan A contradicts all of the points Green Belt serves five purposes: <ul style="list-style-type: none"> <li>to check the unrestricted sprawl of large built-up areas</li> <li>to prevent neighbouring towns merging into one another</li> <li>to assist in safeguarding the countryside from encroachment</li> <li>to preserve the setting and special character of historic towns</li> <li>to assist in urban regeneration, by encouraging the recycling of derelict and other urban land” (Government, 2012)</li> </ul> </li> <li>Should there be extra houses built we would need to see plans for green spaces being interspersed.</li> <li>Stone is surrounded by beautiful green land.</li> <li>Should take radical action to increase brownfield development and to bring life back to abandoned sites. That means high quality housing for families in town centres, breathing new life back into our high streets, turning abandoned shopping centres into new communities and increasing density of housing around transport hubs to build homes that people want to live in.</li> <li>Residents are entitled to their share of green land.</li> <li>Just 16% of houses built on Green Belt land since 2009 outside local plans were classed as ‘affordable’.</li> <li>Build on brownfield sites, use brownfield sites in the town to provide homes.</li> <li>We need to spend the money on regenerating the town first.</li> <li>Smaller developments around the town of Kidderminster would share the load.</li> <li>Logical to build houses on Brownfield Sites between Kidderminster, Bewdley and Stourport on an infill basis. This could contribute to the regeneration of these towns.</li> <li>Blakedown, and Wolverley and a development of Lea Castle are better served by the existing infrastructure in terms of transport and schools. Why has no development been proposed in Wolverley?</li> <li>With a modified Option B development (making greater use of Blakedown and</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>Wolverley) across the Wyre Forest will maximise the use of current resources and as a consequence reduce demands on the infrastructure of one area.</p> <ul style="list-style-type: none"> <li>• Houses are being built to accommodate West Midlands overspill NOT extra housing needed for Wyre Forest residents.</li> <li>• Extra housing should be located nearer to industrial areas where jobs are available, better for the environment with a reduction in the pollution from commuting cars.</li> <li>• Land being 'banked' by developers should be used along with empty buildings.</li> <li>• A sprawling new housing development is going to do absolutely nothing for the quality of people's lives in this area.</li> <li>• A very low percentage are affordable homes for first time buyers.</li> <li>• We cannot just keep allowing development to keep eating into our precious British countryside. Our shared environment is worth a lot more than mere money when it has such a dramatic affect on the quality of people's lives.</li> <li>• The surrounding countryside is beautiful and should not be allowed to be built on. I don't believe there are enough jobs in the local area to require extra homes.</li> <li>• National trends show house demand to be flat lining therefore there is no justification to build more houses.</li> <li>• The planners have been misinformed by the Amion independent report.</li> <li>• There is a static population - the housing planned far outweighs the need.</li> <li>• The POD does not acknowledge the full input and importance of this AMEC report as it is clearly a major piece of work identifying the sites.</li> <li>• This huge development goes way beyond any health foot print we should be trying to make! More cars more fumes.</li> <li>• Do not see how Kidderminster can sustain any more housing</li> <li>• Could the development options be less concentrated and spread around the whole of Kidderminster, not just the south-east?</li> <li>• House values on Spennells will decline.</li> <li>• As a country, we need more houses.</li> <li>• The plan must include social housing, and a greater number of houses will help in a small way to keep a lid on local housing costs which is forever rising so</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>making it almost impossible for young couples to get their foot on the first rung of the housing ladder.</p> <ul style="list-style-type: none"> <li>• Build on housing estates like Comberton or Spennells as they have been designed for and could just be extended.</li> <li>• Many of the existing residents on Spennells bought a house that took up Green Belt land and farming land. They did not think about it too much as they wanted to have a bigger, better house.</li> </ul>	
OC/13(S) - Stone Hill South	<ul style="list-style-type: none"> <li>• Ridge between Stanklyn and Bell Brooks should be kept open as green wedge. Grade 2 areas should not be developed. Some of northern part is marsh. Irrigation system dating from 17th century. Area to south of Spennells is part of former Stone Common and Hoo Farm. This is grade 2 and should not be used for housing.</li> <li>• Effect on the wild life habitat which is continually being eroded.</li> <li>• Loss of rights of way.</li> <li>• The benefits to mental health and physical well being are at serious risk.</li> <li>• Effect on the ability of local schools and medical centres.</li> <li>• Building here will disrupt the flow North / South of wild life into the Spennells Valley Nature Reserve.</li> <li>• Building on parts of the flood plain.</li> <li>• Encroaches on HSE consultation zones.</li> </ul>	Biodiversity issues mean that this site will not be released for development
WFR/ST/2 - Land off Stanklyn Lane	<ul style="list-style-type: none"> <li>• This land is part of the former Stone Common.</li> <li>• High agricultural grading and should be retained for food production.</li> <li>• Development would cause Kidderminster to join up with ribbon development at Summerfield.</li> <li>• Stanklyn Lane is a relatively narrow road with no footpath along the whole length of it. It is used as a "rat run" by commuters which makes being a pedestrian dangerous.</li> <li>• Local schools are oversubscribed already.</li> <li>• Loss of wildlife.</li> </ul>	This site is no longer being proposed for development.



## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• Impact on views towards Stone.</li> <li>• Destruction of nesting areas for birds – corn buntings, skylarks etc. and destruction of habitat of butterflies and bees.</li> <li>• Loss of Green Belt.</li> <li>• We are already a vast expanse of houses with an <u>exceptionally poor road</u> transport system.</li> <li>• To consider adding further traffic volumes to this already inadequate system is madness.</li> <li>• This is a lane not a dual carriage-way and already has massive problems at the T-junction with the busy A449.</li> <li>• To consider building a second school so close to the existing one, will not only increase traffic and traffic noise, but ultimately lead to higher exhaust emissions and pose a risk to health.</li> <li>• Putting all of the proposed housing development in one area of the town would create an imbalance with too much pressure on the infrastructure.</li> <li>• If houses are built here then all this wildlife will be lost forever some of which is protected.</li> <li>• We will also have to put up with all the dirt, disruption and noise.</li> <li>• It cannot be guaranteed that any new houses built will help any local housing supply issues.</li> <li>• If access to the proposed new development is made from the existing Spennells estate, not only will there be a significant increase in traffic along the existing roads throughout the day but also at peak rush hour time traffic at the two Heronswood Road exits from Spennells Valley Road will become even more congested than they currently are.</li> <li>• If access onto Stanklyn Lane is provided then the two ends of Stanklyn Lane, at Stone and Summerfield, will see a huge increase in traffic congestion at currently awkward and hazardous junctions.</li> <li>• The Spennells estate should be a model for developers to follow, leave it alone; it works for the local residents!</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• Will overwhelm local roads, permanently remove Green Belt land and withdraw a popular recreational leisure area.</li> <li>• These fields host a wide variety of plant and wildlife and all will be lost.</li> <li>• The fields are used by dog walkers, runners, and ramblers.</li> <li>• The removal of leisure and recreational space.</li> <li>• Question the source of the predicted rise in population.</li> <li>• The plan to build a road to connect the Bromsgrove and Worcester roads will deliberately increase through traffic.</li> <li>• Such a large increase in the number of households concentrated in a single area will put pressure on local essential services, especially health and education.</li> <li>• The negative impact on the biodiversity &amp; wildlife in the area.</li> <li>• The impact on the existing residents from increased traffic.</li> <li>• The absorption of Summerfield &amp; Stone into Kidderminster.</li> <li>• That there appears to be little consideration regarding infrastructure particularly access to medical treatment and schooling.</li> <li>• Lost forever. Stanklyn Lane is a haven for many local people to enjoy comparative safety walking, riding, cycling and enjoying the ancient public Rights of Way paths crossing fields and leading on our country lanes.</li> <li>• Noise and air pollution and the negative effect that this will have on the residents in the local area.</li> <li>• We are in full support of the proposal and the land owner's intentions towards this overall development and the inclusion of this land are positive.</li> </ul>	
AS/10 - Rear of Spennells & Easter Park	<ul style="list-style-type: none"> <li>• Flood area-Take away the fields – would this cause flooding on the estate due to the natural water table.</li> <li>• The railway embankment acts like a dam.</li> <li>• Traffic congestion.</li> <li>• Destruction of nesting areas for birds – corn buntings, skylarks etc. and destruction of habitat of butterflies and bees.</li> <li>• Loss of Green Belt.</li> <li>• We are being encouraged to protect our wildlife and you want to take away their</li> </ul>	This land is not proposed for allocation in this Local Plan

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>natural homes</p> <ul style="list-style-type: none"> <li>Site should be released in its entirety to provide a comprehensive development with necessary infrastructure helping to contribute to the provision of housing needed to meet the needs of the Black Country and Birmingham</li> </ul>	
WFR/WC/16 - Lea Castle Hospital extension (S)	<ul style="list-style-type: none"> <li>Important site for separating Kidderminster and Lea Castle Hospital.</li> <li>Prefer to see site left open.</li> <li>Site WFR/WC/16 should not be developed. The village of Cookley is entirely separate and clearly distinct from the outer suburban areas of Kidderminster.</li> <li>Development effectively joins the village of Cookley to Kidderminster.</li> <li>WFDC should be supporting Wolverley and Cookley Parish Council to meet its local needs in a sustainable way and not by destroying our Green Belt.</li> <li>Support a plan to develop the Lea Castle site (WFR/WC/15) and adjacent sites (WFR/WC/32) and (WFR/WC/16).</li> <li>This proposal links Lea Castle development to Kidderminster, and therefore links Cookley to Kidderminster. Your proposals do not support your vision.</li> <li>There is lack of local infrastructure to support.</li> <li>No provision made for additional demands on existing services such as schooling, GP surgery and shops. I also have concerns re increased traffic in the area and the exhaust emission and noise pollution associated with it.</li> <li>Contrary to retaining the local identity of Cookley. The Parish Council want to safeguard the setting and special character of the villages.</li> <li>Site identified as making a 'contribution' and 'significant contribution' to the Green Belt by the Green Belt assessment.</li> <li>No consideration given to infrastructure.</li> <li>Concerned about housing development areas without any employment or entertainment for young people.</li> <li>Access and highways infrastructure is insufficient to cope with proposed development. Additional visibility splays and traffic lights will not do anything to help this.</li> </ul>	This site is not proposed for allocation as it would remove the strategic gap between Lea Castle and Kidderminster.

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• Will houses be taken by commuters and what would impact be on roads, services and carbon footprint?</li> <li>• The proposed extensions, in one area are unfair to local residents causing a new bottle neck to the entry of Kidderminster.</li> <li>• Cookley is a village and should remain so.</li> <li>• Who is the development aimed at clearly not the local population with only 18% affordable housing.</li> <li>• This kind of development will attract people from outside the area not people who already live and work here.</li> <li>• Lea Castle site is an area of natural beauty this should be preserved and enhanced. It is an asset that could be used for the benefit of local people in perpetuity.</li> <li>• Other local action groups are recommending development of Lea Castle to protect their own interests, which is understandable...but Cookley is a village.</li> <li>• To cater for increased housing that is not actually required is against the Development Needs Assessment 2015.</li> <li>• Creates a link to the Lea Castle site which cumulatively would result in an unacceptable linear extension of Kidderminster towards the north-east and encourage urban sprawl towards Cookley creating a corridor of continuous development between the two settlements.</li> <li>• It is a sloping site that is highly visible, particularly from the A449 Wolverhampton Road and from the Wolverley direction and as such any large-scale development would be highly visually intrusive.</li> <li>• Would create a significant and unacceptable narrowing of the designated Green Belt between Kidderminster and Stourbridge and the wider West Midlands conurbation.</li> <li>• When left fallow, this arable field becomes one of the distinctive poppy fields in this area of Worcestershire and one of the few on the east side of Kidderminster.</li> <li>• No submitted plans to describe where proposed facilities like doctors, shops, schools for us to consider.</li> <li>• Redevelopment of Kidderminster is needed prior to this development to support</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>jobs and infrastructure.</p> <ul style="list-style-type: none"> <li>• How is a development of 1200 – 1400 homes joining Cookley at the northern end, to Broadwaters, Kidderminster at the southern, in any way a development that meets the needs of Cookley as a village?</li> <li>• Village envelope will be stretched to Kidderminster and our Green Belt will be decimated.</li> <li>• These homes will simply act as a commuter belt for Birmingham, Wolverhampton and others.</li> <li>• Does not agree with Green Belt land being swallowed up into urban development unless, as a very last resort!</li> <li>• It is Green Belt land currently being farmed.</li> <li>• It also will be the only countryside buffer.</li> <li>• I am shocked that our Council would build on land that has been preserved as Green Belt</li> <li>• This local plan does not promote sustainable development.</li> <li>• Public transport needs reviewing to ensure services are more reliable, accessible right across Wyre Forest, run frequently and economic to use.</li> <li>• Housing should be spread as equally as possible across Wyre Forest so that it does not negatively impact one side/area.</li> <li>• Development here is both unnecessary and morally wrong. Green Belt is not to be used in this fashion it is fit agricultural and recreational use only.</li> <li>• Will devalue our house if the plans go ahead.</li> <li>• Kidderminster will suddenly no longer feel rural, but completely over-crowded.</li> <li>• Cookley is referred to as <i>“Inset Green Belt”</i>. How will this be Inset when our southern Green Belt is completely removed?</li> <li>• The more Green Belt that is taken away and replaced with concrete will impact on the amount of water that goes into the drains.</li> <li>• An ill-thought out proposal and I disagree with such an aggressive development on Green Belt land.</li> </ul>	
WFR/WC/32 - Lea	<ul style="list-style-type: none"> <li>• Prefer the larger Option B to be developed to achieve the required number of</li> </ul>	This site is proposed for allocation as part of

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
Castle Hospital extension (E)	<p>dwelling for an additional primary school. Cookley village primary school should remain a village primary school serving the needs of the immediate local village.</p> <ul style="list-style-type: none"> <li>• Potential for land allocated in your plan to encroach on HSE consultations zones.</li> <li>• Supports the inclusion of the Lea Castle Hospital Extension site,</li> <li>• Considered an appropriate location to deliver additional housing at Kidderminster.</li> <li>• This area would provide a good number of dwellings (2000+) with local amenities to compliment this size of development such as a primary school a good bus service etc.</li> <li>• Lack of local infrastructure to support this. In terms of Schools, Doctors' Surgery, shops and transport Cookley is already at capacity.</li> <li>• Highways infrastructure would also not cope with the additional traffic and some additional visibility splays and traffic lights will not do anything to help this.</li> <li>• As a separate village Cookley should be allowed to expand in line with its own needs.</li> <li>• Object to options A &amp; B or any developments that effectively joins the village of Cookley to Kidderminster.</li> <li>• Current infrastructure will not support this development.</li> <li>• For this proposal to be successful extra schooling and medical facilities and great improvements in road safety would be needed</li> <li>• This site is very open. Development would mean urbanisation of open countryside.</li> <li>• Should be meeting local needs in a sustainable way and not destroying Green Belt.</li> <li>• There are brown field sites not on plan.</li> <li>• The access and highways infrastructure would also not cope with the additional traffic.</li> <li>• 600 homes can never be supported by the facilities in the village which are near capacity already. The additional proposal of Option B would only compound the</li> </ul>	<p>the wider Lea Castle Village proposal. The allocation will include residential and open space, with up to 7ha for workshop units. Warehousing and general industry will not be permitted on this site. The site will be landscaped with development set back from the road frontage and kept below the ridgeline.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>problem. The village needs to expand according to its own needs and the development of this site should reflect this.</p> <ul style="list-style-type: none"> <li>• WFDC should be supporting Wolverley and Cookley Parish Council to meet its local needs in a sustainable way and not by destroying our Green Belt</li> <li>• Cookley is a Village INSET in Green Belt. It has its own strong identity and provides key local services.</li> <li>• Cookley is a village. It is not an extension of Kidderminster and it should not be sacrificed to support Kidderminster's needs.</li> <li>• Loss of Green Belt land not just at Lea Castle.</li> <li>• What plans are there for more facilities e.g. Doctors', shops, schools?</li> <li>• Redevelop Kidderminster first to support local jobs/infrastructure/transport.</li> <li>• Where link roads and what are is their impact?</li> <li>• No access should be permitted onto the A449 from Lea Castle.</li> <li>• No access should be permitted from Lea Castle via The Crescent.</li> <li>• Axborough Lane- although it is only proposed that a small amount of houses access this road, it will inevitably be a choice road to cut through to the Stourbridge Road.</li> <li>• Concerned that Cookley will become a 'rat run' to and from Kidderminster via Lea Lane.</li> <li>• Consider that the main road in and out of Lea Castle should run directly onto the Stourbridge Road A451 (between Axborough Lane and the Park Gate pub). A roundabout at this point or slip roads</li> <li>• Public transport needs reviewing to ensure services are more reliable, accessible right across Wyre Forest, run frequently and economic to use.</li> <li>• Any building on the Lea Castle site needs to be sympathetic to the area, I would be totally against removing/destroying the forest area as this creates a natural 'wall' and in effect hides the fact that a housing estate may exist there. Existing wildlife should be considered as we are aware of bats on this location and other precious wildlife.</li> <li>• This local plan does not promote sustainable development.</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• I see no reason for development to remove trees, woodlands or wild life habitats in the name of progress.</li> <li>• Site identified as making a ‘contribution’ and ‘significant contribution’ to the Green Belt by the Green Belt assessment. The site should not be allocated for development.</li> <li>• Impairing the quality of the rural environment visible and immediately accessible from Greenhill.</li> <li>• Noise and air pollution due to increased traffic on the roads around Greenhill and Broadwaters.</li> <li>• Pressure on local amenities (play areas, schools, shops, etc).</li> <li>• Pressure on public transport, since the proposed sites are too far from the town centre and secondary schools to access by walking.</li> <li>• Kidderminster will suddenly no longer feel rural, but completely over-crowded</li> <li>• Does not agree with Green Belt land being swallowed up into urban development unless, as a very last resort!</li> <li>• Cookley is a Green Belt village. The Council has a responsibility to ensure this continues.</li> <li>• Removal of Green Belt including established woodland will affect wild life in the area, Buzzards and Bats along with other species.</li> <li>• Cookley is referred to as “village Inset Green Belt” how can this be if our Green Belt is removed?</li> <li>• Access should be via the B4189 and the A451 in order not to over burden the already busy A449.</li> <li>• Before established Green Belt is destroyed for new housing all existing brown field sites within the councils jurisdiction should be fully developed.</li> <li>• I do not agree that the neighbouring fields bordering the A451 should be added on. This would be an eyesore for those approaching Kidderminster, as well as wanton destruction of productive farmland.</li> <li>• How is a development of 1200 – 1400 homes joining Cookley at the northern end, to Broadwaters, Kidderminster at the southern, in any way a development</li> </ul>	



## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>that meets the needs of Cookley as a village? Our village envelope will be stretched to Kidderminster and our Green Belt will be decimated.</p> <ul style="list-style-type: none"> <li>• How will Cookley be Inset Green Belt when our southern Green Belt is completely removed?</li> <li>• These homes will simply act as a commuter belt for Birmingham, Wolverhampton and others.</li> <li>• Cookley is a village. It is not an extension of Kidderminster and it should not be sacrificed to support Kidderminster's needs.</li> <li>• Concerns re increased traffic in the area and the exhaust emission and noise pollution associated with it.</li> <li>• Will join Cookley Village a rural community to Kidderminster Town and therefore lose the village status.</li> <li>• Concerned about housing development areas without any employment or entertainment for young people.</li> <li>• Access and highways infrastructure is insufficient to cope with proposed development.</li> <li>• Consider other brown field sites in Wolverley to share the housing quota which is due to Wolverley and Cookley Parish.</li> <li>• The core development – is now far greater than originally proposed. This was just to be on the site of the Lea Castle hospital and it should not extend into neighbouring fields and woodland.</li> <li>• This is an ill-thought out proposal and I disagree with such an aggressive development on Green Belt land.</li> <li>• Children and parents walking to school in Cookley would need to cross the A449 safely. We think that Lea Castle site should be developed, but sympathetically in its own right and as a separate entity to Cookley and Kidderminster with its own infrastructure and surrounded by the woodland already established not surrounded by houses.</li> <li>• We should be doing all we can to protect and preserve these areas. They should be used only when all brownfield options have been exhausted.</li> <li>• What is the main force driving this development, population growth?</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• Destruction of Green Belt land.</li> <li>• 1000 homes completely out of context with local environment.</li> <li>• This kind of development will attract people from outside the area not people who already live and work here, increasing pollution and traffic density.</li> <li>• Lea Castle site is an area of natural beauty this should be preserved and enhanced.</li> <li>• The area affected is home to wildlife including birds of prey and sometimes deer. I am shocked that our Council would build on land that has been preserved as Green Belt.</li> <li>• Plans will result in Cookley losing this sense of identity, history and community.</li> <li>• The more Green Belt that is taken away and replaced with concrete will impact on the amount of water that goes into the drains.</li> <li>• Do not consider it possible for east of Kidderminster to sustain completion rates needed to deliver these allocations during Plan period.</li> <li>• The roads, around this site already have many problems.</li> <li>• A451 Stourbridge Road, both this junction &amp; the whole of the Stourbridge Road again is a fast road experiencing many accidents &amp; fatalities.</li> <li>• A large number of dwellings could support a 2 form entry primary school, thus reducing the impact on the local facilities.</li> <li>• It would be within the catchment of Wolverly CE High School and would positively impact the schools long term viability.</li> <li>• It would be capable of sustaining a bus service.</li> <li>• It would support a village centre which would fall under Cookley Parish, but would not put any burden on that community as it would be large enough to support its own park, village hall, school and shop.</li> <li>• It would potentially be able to provide live-work units.</li> <li>• Impact on The Crescent would be small.</li> <li>• It makes sense to develop just a few areas of the district with large housing sites rather than lots of areas with smaller developments.</li> </ul>	
Eastern Relief Road	<ul style="list-style-type: none"> <li>• Details of the so-called “Eastern Relief Road” are vague and not in a form that</li> </ul>	The proposal for an ‘eastern relief road’ has

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
Comments	<p>can be fairly assessed in this consultation</p> <ul style="list-style-type: none"> <li>• A road tunnel and rail bridge would be needed near the A449 and another expensive and intrusive bridge over the railway line would be needed at Offmore. This expenditure is totally unjustified, since the A450 already serves the purpose.</li> <li>• No definitive route or traffic model has been provided for this proposal.</li> <li>• Local residents are not being provided with sufficient details to make an informed judgement</li> <li>• Route must have been put forward to enable preliminary costings and this information should have been transparent in the local plan review.</li> <li>• If an improved means of road transport is needed, this could be provided by widening the existing A450.</li> <li>• The proposed new road (the Eastern Relief road) would impact environmentally sensitive areas with increased air pollution, more noise pollution, light pollution and the destruction of large amounts of natural habitats.</li> <li>• A new road would create a whole series of dangers, hazards and disadvantages to local residents and local wildlife</li> <li>• An Eastern Relief road would not help to regenerate Kidderminster</li> <li>• The construction of the Eastern Bypass is likely to encourage more car journeys</li> <li>• The claim that the Eastern Relief Road will facilitate an improvement in AQMA at Churchfields is bogus,</li> <li>• No rationale reasoning has been given for the need of an Eastern relief road</li> <li>• The additional cost of funding the provision of railway bridges for a dual carriageway could well be prohibitive.</li> <li>• There should be no development to the east of Offmore until after an Eastern By Pass has been constructed.</li> <li>• If this by-pass was, in fact, built can WFDC confirm that there would be no need to connect to Turnstone Road.</li> <li>• If extended as far as the A449, the Kidderminster Eastern Relief Road would cause congestion further up the A449 so affecting the villages of Cookley and Caunsall.</li> </ul>	<p>been removed from the Plan. Funding will be sought by Worcestershire County Council to upgrade existing roads in order to remove heavy lorries from the local network.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• There is no evidence in the report to show that a new access road, which would be essential to gain access to the sites.</li> <li>• WFDC have signed up to the Carbon Emissions Programme – yet the end goal based on the Local Plan Review is to get the Eastern Bypass/Relief Road funded from Central Government.</li> <li>• The LTP4 states that it is a misnomer to say just building a road alleviates a problem - the very building of that road leads to ‘that road’ becoming the next problem.</li> <li>• A <u>new road</u> would simply move traffic a little further away to existing congestion areas on the Worcester Road, Husum Way, Blakedown, Hagley and Mustow Green/Bromsgrove.</li> <li>• Previous plans to have a relief road twenty years ago were rejected.</li> <li>• I would question why this road is needed and what benefit it would provide.</li> <li>• The plan mentions creating cycling and walking paths for people, we will lose the public footpaths and routes currently available on the eastern side of town if you go ahead with option A.</li> <li>• Spennells already absorbs noise from the railway line, Worcester Road and factory units at Easter Park (which recently had a request for extended hours rejected on the grounds of noise) and further noise pollution would be unacceptable and would have an adverse effect on health and quality of life.</li> <li>• We fail to understand how this ribbon development can be contemplated without first considering an eastern bypass.</li> <li>• A relatively high speed road would lead to a reduction in air quality in what would be a residential area and make any existing rights of way unattractive for recreational activities, especially important in Kidderminster, with its relatively obese and elderly population.</li> <li>• Footbridges should be provided for both pedestrians and cyclists.</li> <li>• It has been suggested that this road will also serve as a “bypass”. However, it cannot serve as a route which will carry HGVs as well as run through a housing estate.</li> <li>• The rough map indicates that it would terminate at the A456, which makes no</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>sense in terms of where bypass traffic is expected to go from there – clearly the A456 and the Land Oak junction would experience higher traffic flows.</p> <ul style="list-style-type: none"> <li>• I understand that a proposal to either raise the railway 'Black Bridge' over the A450 or to lower the road under the 'Black Bridge' has already been investigated, so that HGVs could use this route.</li> <li>• There is virtually no room for such a road to pass through the proposed development at OC/13 south which passes the water course incorporating Captains Pool and the green corridor to Stanklyn Pool in order to then link up to the A448 Bromsgrove Road.</li> <li>• A road link at Easter Park would have to cross the railway presumably with a bridge. This would have a significant visual and noise impact on the area.</li> <li>• A Kidderminster eastern relief road would attract more traffic, particularly HGVs, along any new development between Stanklyn Lane and Spennells. The aim should be to divert traffic away from Kidderminster entering from the south and east.</li> <li>• The majority of the A450 could be upgraded without major disruption to traffic flows whilst being built. This would greatly reduce traffic on the Chester Road North and South and remove pollution from Kidderminster.</li> <li>• It will serve no other purpose than to give access/egress to the new developments.</li> <li>• It will require significant investment from the public purse because it will have to cross an existing rail network at one or two points by going under or over.</li> <li>• Developers will only contribute toward the easier/cheaper engineering which crosses through virgin land, they will not expect to fund major engineering works.</li> <li>• It is factually incorrect to promote it as a relief road or by-pass, in fact it will be a local distributor road.</li> <li>• The so called relief road will not provide an alternative to the current congestion on A449 or A448.</li> <li>• No evidence of any traffic survey data to prove such a road is required.</li> <li>• Local authorities should not be spending public money on schemes that have no</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>direct benefit to the community at large.</p> <ul style="list-style-type: none"> <li>• The proposed route would open up Green Belt to unnecessary development.</li> <li>• Any option that includes a relief road should not be followed without a guarantee that the relief road would be constructed.</li> <li>• No research has been done to show that carving up our Green Belt land for such a road would serve the purpose.</li> <li>• The A450 already accommodates the need for the majority of traffic going towards Birmingham,</li> <li>• Money would be better spent on amending the bridge to allow larger vehicles to pass under, rather than increase light, noise and exhaust pollution elsewhere.</li> <li>• The close proximity of the Roxel site should also be considered as there have been incidents that affected residents and safety should be considered.</li> <li>• Network Rail will also no doubt place strict guidelines on any building of roads, bridges and houses near their lines which will also increase costs considerably.</li> <li>• This appears to have been resurrected apparently again due to another 'useful contribution' from the Greater Birmingham and Solihull LEP.</li> <li>• Wyre Forest seems to have survived quite well for the last 21 years without the need for this bypass.</li> <li>• The sole reason for resurrecting this proposal must be to enable easier access to the motorway network for the proposed and any future Birmingham overspill.</li> <li>• I would be very open to further investigation into the Eastern relief road regardless of which option is taken as I feel this could be necessary in the future to reduce traffic flow through the town, Chester Road and Land Oak areas</li> <li>• Relief roads are not popular but neither is congestion and poor traffic flow and in the modern world this is an ever increasing problem</li> <li>• I trust any relief road would be built sympathetically to the surroundings taking nature and wildlife into consideration.</li> <li>• Would like to see the detailed work on traffic flows around Kidderminster that demonstrates that an Eastern Bypass is viable financially, practically and ethically.</li> <li>• How many homes would have already been built before construction of the road</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>begins?</p> <ul style="list-style-type: none"> <li>• There is a further issue to the location of this Relief Road and that is the electricity pylons and cables that cross the land from Stanklyn Lane to Bromsgrove Road.</li> <li>• Within your local plan there is mention of trying to raise funds for this "Relief Road", what will you do if there funds are not available?</li> <li>• The present Local Plan should be significantly rewritten to include the full impact of road proposals to enable residents to give their verdict on the proposed urban extensions.</li> <li>• Land N of Comberton Road can deliver significant section of relief road with secondary links onto Husum Way and Spennells Valley Road/Comberton Road. A Transport Assessment will be undertaken to support a future planning application.</li> <li>• The budget (£17.5 million) seems grossly under-estimated, especially considering that the Worcester Road to Silverwoods Link Road cost in the region of £6.5 Million.</li> <li>• The Plan appears to have a strong bias towards the promotion of Option A, seemingly to facilitate the building of an Eastern Relief Road.</li> <li>• Traffic wishing to avoid Kidderminster can already do this without the expense and environmental damage which would be caused by constructing yet another road through the Green Belt.</li> <li>• Any new road should run the whole eastern side of Kidderminster from A449 North to A449 South, possibly to A451.</li> <li>• The elevated position of the new road linking the Wolverhampton Road and Worcester Road would mean it would require at least a 30m tree screen separating it from housing to buffer against traffic noise.</li> <li>• Mention was made of a Southern (?) Relief Road but no effective information has been available. If this is indeed a substantive suggestion it must be much clearer in the final document.</li> <li>• There is no meaningful information about the proposed new road in the Local</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	Plan.	
General Comments	<ul style="list-style-type: none"> <li>LTP4 identifies the need for WFDC to address public transport issues and support the use of cycle lanes.</li> <li>Serious thought needs to be given to finding another entrance/exit to Crossley Park as congestion here will only get worse with an expanding town.</li> <li>WWT does not consider that these biodiversity constraints have been considered properly in the evidence base for the plan and we do not accept the findings of the SA.</li> <li>Would it not be safer and more environmentally friendly to develop one large new housing estate that would include the necessary facilities for the families who move there - e.g. shops and a primary school?</li> <li>The Core sites will take out a considerable chunk of Green Belt land and there appears to be no alternative within the plan. To consult without alternatives is not consultation.</li> <li>Land banking needs to be stopped.</li> <li>The plan seems to pursue urban sprawl and needs to be more imaginative, without building on farmland.</li> <li>New sports provision will be required with the east of Kidderminster sites and this should be addressed in a strategic manner (e.g. perhaps a multi pitch sports hub).</li> <li>Allocation of sites east of Kidderminster will encourage commuting to Birmingham.</li> <li>Against removing Lea Castle and the east of Kidderminster from the Green Belt, this needs to be preserved at all costs. The woodlands should be protected and no dwellings should be seen from the roads.</li> <li>Cannot understand the concept of an eastern by-pass without description/visual aid to show how such a road would be built/its impact on the area, people and the environment. The financial aspect also sounds prohibitive. Surrounding Green Belt fields used for walking and new development will erode this</li> <li>Support for growth in Kidderminster. Agree that this is likely to require carefully</li> </ul>	<p>New strategic development proposals include provision for cycle paths which will link through to the existing network and provide easy access to key facilities</p> <p>Crossley – 2<sup>nd</sup> exit was explored as part of Churchfields Masterplan. It would be difficult to implement and the business case is unlikely to stack up.</p> <p>Meetings have been held between officers and the WWT to discuss their concerns. Ecological site appraisals have been undertaken for a number of key sites and detailed Green Infrastructure Concept Plans have been drawn up by the Worcestershire Green Infrastructure Group.</p> <p>There are 2 strategic allocations proposed which would also provide land for a primary school plus community facilities. Further sports provision is planned at Lea Castle.</p> <p>The proposed allocations will require substantial buffering with additional woodland planting to minimise the visual impact.</p> <p>Urban extension will provide access to the countryside where there is currently no</p>



## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>considered GB release.</p> <ul style="list-style-type: none"> <li>• Support proposed intention to review Green Belt.</li> <li>• The population of Kidderminster over the last few years as remained fairly static and this proposal will unnecessarily attract more people into the area.</li> <li>• We would like to strongly object to this ridiculous plan.</li> <li>• The Council has commitment and planning policy to protect the open countryside. They should therefore follow its own policies in this regard.</li> <li>• Some proposed development areas are on good agricultural land.</li> <li>• There would be a loss of trees and hedgerows, community leisure spaces and public rights of way.</li> <li>• Some proposed development sites have steep gradients which could cause flooding issues from run-off.</li> <li>• Some proposed sites are very near SSSIs. Development could result in loss of wildlife habitat and permanent urbanisation of important landscapes</li> <li>• Development and the associated increase in vehicular movement would have a further detrimental impact upon air quality and would be contrary to the NPPF.</li> <li>• There is a shortage of primary school places – many primary schools in WFDC area are already full to capacity.</li> <li>• Commence work on the 3000 homes on brownfield sites. Use the income you receive from Crown House to pay the salary of an officer to effect the regeneration of the town centre, alongside any grants you may receive.</li> <li>• Kidderminster currently has a very poor town centre which is in desperate need of improvement. Building residential properties instead of more shops would give the place more vitality and attractiveness.</li> <li>• The Green Belt to the east will be attractive to the house builders for the provision of luxury detached houses where the housing need does not appear to lie.</li> <li>• There is no clear indication of how the development to the south and east of the town would be accessed.</li> <li>• Large numbers of additional housing on one side of Kidderminster will put strain</li> </ul>	<p>public access. An extensive network of signposted walking routes is proposed as part of the development.</p> <p>The population of Wyre Forest is projected to increase by 4.9% over the plan period.</p> <p>Kidderminster is surrounded by high quality agricultural land with poorer quality land mostly found either west of the River Severn or where the topography would make development difficult. As there is insufficient brownfield land which is viable to bring forward, the release of high quality agricultural land for development is unavoidable in order to allocate enough land to cater for the housing requirement.</p> <p>It is hoped that the brownfield sites which are currently allocated for redevelopment can be brought forward in advance of any release of Green Belt land through the Local Plan process.</p> <p>The Local Plan proposals include a number of additional brownfield sites within Kidderminster with housing the most likely use for the former Magistrate's building.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>on the inadequate infrastructure, increase congestion, pollution and change the character of independent communities, particularly Cookley, Hurcott and Stone.</p> <ul style="list-style-type: none"> <li>• Development will encroach onto pasture land, green field and Green Belt areas. This will affect wildlife and remove amenity areas enjoyed by the communities.</li> <li>• There should be more development in Stourport, there would be scope for another High School which would give people more choice.</li> <li>• Green Belt land is essential to maintain wildlife.</li> <li>• Please ensure that the Husum Way Junction on the A459 Birmingham Rd junction is made safe.</li> <li>• Develop Lea Castle so as to be "self-contained".</li> <li>• Include sustainable transport provision such as cycle lanes/bus services, esp. between the new settlement/Broadwaters and Kidderminster.</li> <li>• The council owns a great deal of properties in and around the town centre which are currently unused and create an eyesore and derelict look to the town.</li> <li>• It is imperative that diversion of traffic away from main population areas is considered using a link road to avoid the villages of Blakedown and Hagley.</li> <li>• The proposed expansion can only result in Kidderminster becoming a satellite town for Birmingham</li> <li>• Historically the town has always been unable to compete, in terms of introducing new businesses, with the facilities of Birmingham to the north or the attractiveness of Worcester to the south.</li> <li>• The continuous loss of quality agricultural land will further reduce the ability of the country to become more self-sufficient and to decrease our import bill.</li> <li>• Would like to see more imaginative solutions provided for housing than just big blocks of new development.</li> <li>• Minimal impact on the Green Belt would be better achieved by removing a larger volume of smaller sites across the district rather than a smaller number of large sites which will have greater impact.</li> <li>• Please do not assume that green land doesn't matter to us, as it really does</li> <li>• Both proposals A and B propose to build houses on green land behind</li> </ul>	<p>There is currently only one public footpath on the east of Comberton/Offmore near Heathy Mill Farm. There is no other access to the countryside serving these residential estates. The proposed extension will provide an extensive network of circular paths through wetland and woodland areas. The Husum Way junction will be upgraded to a roundabout as part of these proposals. Sustainable transport links from the new development back into Kidderminster and on to Blakedown will be considered as part of these proposals.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>established housing estates. This will destroy beautiful nature and land and make the houses less desirable for incoming residents. These developments would have no heart.</p> <ul style="list-style-type: none"> <li>• Concerned with proposed Kidderminster Urban Extensions.</li> <li>• Kidderminster town itself needs a lot of work, the green spaces around Kidderminster and its many pleasant areas and attractions are what keep us here.</li> <li>• Will WFDC also consider transforming and investing in the town centre itself, within the ring road? When we were renting we struggled to find good quality flats, and there appears to be a lack of these near to town centre facilities.</li> <li>• The town centre is a depressing place to visit and too many people are happy to destroy and ruin anything nice. Make the area residential and bring life back into this area. Don't destroy our Green Belt.</li> <li>• We question whether the provision of the Kidderminster Eastern Relief Road would be at the mercy of central government funding? If so, what happens if option A is adopted and the relief road doesn't materialize?</li> <li>• Whilst we understand the need for more housing and the difficult decisions that have to be made, we ask that it could be more proportionate around the area.</li> <li>• Our town is lucky to be surrounded by Green Belt because it lets you know you have arrived and are travelling into a town that is proud to stand on its own</li> <li>• Loss of this Green Belt land, in combination with development of the Lea Castle hospital site, would create a significant and unacceptable narrowing of the designated Green Belt between Kidderminster and Stourbridge and the wider West Midlands conurbation.</li> <li>• The proposed development on the East side of Kidderminster would not appear to address the core policies of the Local Plan Review (Sections 6 to 11) in encouraging the growth of Wyre Forest with Kidderminster at its centre. It would encourage the corridor of growth along the A456 and A451 for commuters to Birmingham and Stourbridge and areas served by Bromsgrove District and Dudley Metropolitan Borough Councils.</li> <li>• Wyre Forest's ageing and static population (Table 2.0.1) would not be served by</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 31: KIDDERMINSTER URBAN EXTENSIONS

Site	Key Issues Raised	WFDC Officer Comments
	<p>housing that would require greater mobility to access the amenities provided by Kidderminster town centre.</p> <ul style="list-style-type: none"> <li>• Developing semi-rural sites would be detrimental for the district, destroying open spaces and ruining the approaches to the town from the East which are currently green and inviting.</li> <li>• Concerned about the new road and the amount of traffic that will be generated in and around Kidderminster and the air quality with the additional fumes and noise.</li> <li>• Realises extra housing is necessary but doesn't think it is a good idea to focus developing just one side of Kidderminster - especially on Green Belt land.</li> <li>• There is no guarantee that building more housing on the eastern side of Kidderminster will make the development of an Eastern Relief Road more likely</li> <li>• The 'necessary housing' has been falsely derived by a flawed OAHN report.</li> <li>• It is unnecessary to pave over Green Belt when other forms of buildings can be considered within the curtilage of the existing town boundary</li> <li>• <b>Justification 31.1 states</b> "there is insufficient readily available Brownfield or non-Green Belt land...etc " However there are brownfield sites not on the plan,</li> <li>• 540 unit development for elderly persons would be more suitable and safer on the Lea Castle site.</li> <li>• The proposed relief road will simply attract more vehicles along the A449/A456 route decreasing safety and isolating the town centre from custom.</li> <li>• Justification 31.2 fails to mention that the outline planning permission for the core proposal (for 600+ homes) involves the removal of woodland – Green Belt land – on the site</li> <li>• you really need to have a robust plan for traffic management</li> <li>• Document is too long, too technical and too prescriptive.</li> </ul>	

Further details on site selection can be found in the Site Selection Paper and the Sustainability Appraisal.

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 32: STOURPORT ON SEVERN

Site	Key Issues Raised	WFDC Officer Comments
LI/2 – Wyre Forest Golf Club	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>Existing infrastructure is totally inadequate for the present volume of traffic.</li> <li>This is an important and widely used public open space currently acts as a “buffer” between a large residential area and the local nature reserve and SSSI.</li> <li>Local schools, doctors and dentists are already struggling to cope with existing numbers of occupants in these areas, and a significant increase in the number of houses would lead to an influx in students and patients.</li> <li>The lie of this land has previously been the cause of severe flooding to properties in Elan Avenue, my own property included.</li> <li>New areas of employment would be needed for house buyers.</li> <li>Access to the site is very limited via the Kingsway this is not a main road and was not designed to take a substantial increase to traffic flow.</li> <li>The area is poorly serviced by the current road infrastructure. At peak traffic times there are often traffic queues from the sharp bend in Kingsway to the traffic lights at Burlish crossroads.</li> <li>No evidence base to support the release of the entire site shown from the Green Belt</li> <li>Bewdley has a bypass, Kidderminster has a ring road, Stourport has nothing to alleviate or deviate traffic.</li> <li>There is a spring feeding an Aquifer for Blackwell Abstraction point on the site.</li> <li>We are being asked to lodge our concerns before we actually know exactly what is being planned i.e. the type of houses, the spacing/road layout and the entrance from the Kingsway.</li> <li>Loss of Green Belt/public rights of way/ good agricultural land.</li> <li>With the Burlish Top Nature reserve having homes, right up to its border. Will these defeat the object of a nature reserve?</li> <li>Increase in traffic noise and pollution</li> <li>Surface water flooding.</li> <li>The land has been contaminated by recent waste tipping.</li> <li>The Kingsway road will require widening to a standard carriageway so that</li> </ul>	This site is no longer proposed for allocation in this Local Plan

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Site	Key Issues Raised	WFDC Officer Comments
	<p>residents can access the A451 safely rather than use Burlish Crossing or Windermere Way.</p> <ul style="list-style-type: none"> <li>• The Burlish Crossing lights will need to be reconfigured to avoid even worse traffic delays if all the developments closest to this junction are approved.</li> <li>• The proposal to develop the golf course does not take into consideration that for building of properties the site will be cut into two by the Strategic Main and its service access zone. This will not only limit the number of dwellings but effectively create two separate sites.</li> <li>• The site borders an SSSI.</li> <li>• Public transport is not seen as viable as bus service is 'extremely poor.'</li> <li>• Severn Trent has put a major pipeline through the site surely this cannot be compromised.</li> <li>• Loss of wildlife. It is home to badgers, sky larks and many other animals. Any development would be destructive and have a massive impact on the environment. There would be light and noise intrusion to the nature reserve and would remove a valuable public amenity.</li> <li>• Concerns related to potential impacts on biodiversity at Wyre forest golf club. Due to the presence of acidic habitat.</li> <li>• The increased traffic Burlish Top to the main Kidderminster - Stourport road represents a real safety hazard particularly to children at Stourport High School and users of the sports facilities. The road is very narrow and would not support increased traffic.</li> <li>• Wouldn't this land be better used for recreational purposes giving its proximity to the nature reserve, taking into account National obesity levels rising, the lack of local leisure facilities in both Bewdley and Stourport (and an under-equipped Leisure Centre for the Wyre Forest as a whole) and also the fact that the land is currently utilised by dog walkers and children for leisure?</li> <li>• Given that the plan now only suggests housing on this site, am I right to assume that the 'recreational' plans for this land have been quashed?</li> <li>• There is already a problem with illegal use of motorcycles and at night with youths drinking/drugs. Any major development will probably exacerbate these problems.</li> </ul>	

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Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• Impact of pollution on health.</li> <li>• I am concerned that any development will increase the risk of flooding properties.</li> <li>• The development is another step towards joining the towns of Kidderminster and Stourport via Birchen Coppice. Development towards the joining of the two towns must not be allowed to take place.</li> <li>• Would be better used as allotments.</li> <li>• This currently acts as a “buffer” between a large residential area and the local nature reserve and SSSI.</li> <li>• It is used by many walkers (ref. obesity figures for Wyre Forest District).</li> <li>• An area with no direct public transport into the nearest town, increasing car traffic and air pollution.</li> <li>• Green Belt land must be protected at all costs.</li> <li>• Doctors and Dentists will find it difficult to cope with extra people.</li> <li>• More schools will be needed and that will mean more transport on our roads.</li> <li>• Traffic is very noisy already on our roads so the increase will make it worse.</li> <li>• The impact of building houses on Kingsway field would have significant impact on plant and wildlife on Burlish Top Nature Reserve.</li> <li>• There is no need to use Green Belt land when there are enough brownfield sites around Wyre Forest District.</li> <li>• This site should not be developed as it is essential to maintain green space between the three towns.</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>• If the golf course cannot be reopened then the site could be used for building more homes having good accessibility to both Kidderminster and Stourport.</li> <li>• Site suitable for mixed housing and green space.</li> <li>• I support the release of land at site LI/2, subject to significant landscape considerations.</li> <li>• The whole of the western edge of Stourport lacks any landscaping, so enhance the views across to Burlish Top.</li> <li>• A policy of the plan should set out at this stage that only the lower-Lying areas of</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 32: STOURPORT ON SEVERN

Site	Key Issues Raised	WFDC Officer Comments
	<p>the site, say to the south of where the pipeline has been laid, should be considered for housing purposes. The visually prominent northern half of the site should be set aside for landscaping and habitat restoration, so as to enhance Burlish Top.</p> <ul style="list-style-type: none"> <li>• Part of the northern most land could be used to provide a car park for the Wildlife reserve at Burlish Top.</li> <li>• LI/2 could also be designated for use by self-build applicants</li> </ul>	
LI/6/7 – Lickhill Road, North	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>• Roads around Burlish Crossing are already heavily congested and additional traffic would cause further congestion at the Swan Hotel/High street junction.</li> <li>• Traffic an issue at Burlish Crossing.</li> <li>• Negative impact on wildlife.</li> <li>• Loss of agricultural land.</li> <li>• Lack of facilities in Stourport already, increasing population will stretch the existing services i.e. GPS, dentists and schools.</li> <li>• Building houses here would increase commuter traffic through the known congestion points in Kidderminster or Stourport in order to access the main arterial route. The sites are too far away from town centres.</li> <li>• Increase in traffic will lead to more road noise, pollution &amp; congestion.</li> <li>• Schools already full with lack of places for children. Where will the new house residents' children go?</li> <li>• Increase in traffic will cause more gridlock and affect response times of emergency services as it will take longer to reach their destinations.</li> <li>• Loss of Local wildlife habitats and productive agricultural land.</li> <li>• Green Belt land should remain undeveloped and unpopulated.</li> <li>• Pipeline running across the middle of the field that was put in 30 years.</li> <li>• Doctors, schools and hospital services not available to cater for this growth.</li> <li>• Shouldn't use Green Belt land when brownfield sites are available.</li> <li>• Building on Green Belt will affect wildlife and lead to more flooding.</li> <li>• Need land for food production post Brexit.</li> <li>• Build affordable housing near shops/services for people without own transport.</li> </ul>	These sites are no longer proposed for allocation in this Local Plan mainly due to highway issues at Burlish Crossing.



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Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>Stourport has nothing to alleviate or divert traffic.</li> <li>The bus service is already abysmal, so using the car will be a necessity.</li> <li>Site not big enough for 90 houses, there are only 16 or so on the opposite side of the road, so it must be a very dense development with small houses and close together.</li> <li>Sites L1/6/7 Lickhill Road North represent an unacceptable use of Green Belt land, some would be better used as allotments.</li> <li>The increased traffic Burlish Top to the main Kidderminster - Stourport road represents a real safety hazard particularly to children at Stourport High School and users of the sports facilities. The road is very narrow and would not support increased traffic.</li> <li>Concerns about retaining Stourport's character and identity,</li> <li>Threatening existing public rights of way.</li> <li>There is no evidence that this amount of new housing is required in the Wyre Forest area, where the population growth is below the national average.</li> <li>Surely there should be a review of need for housing in the area and also the provision of schools, health centres and local hospitals before detailed plans for housing.</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>Use garden centre site for mixed housing with green space.</li> <li>I support the release of land at site L1/6/7, subject to significant landscape considerations. The whole of the western edge of Stourport lacks any landscaping, so enhance the views across to Burlish Top.</li> <li>This site is one which represents a sustainable location for development.</li> <li>The site has a choice of routes out to Kidderminster, Bewdley and two routes to Stourport Town assisting and there are bus links within a few hundred meters walking distance from the site.</li> </ul>	
AKR/1 – Bridge Street Basins	<p>Comments:</p> <ul style="list-style-type: none"> <li>AKR/1 – site set aside to access to the canal basins - claw back cost if not?</li> <li>Stourport must remain a well maintained historical town with accommodation over shops.</li> </ul>	A proposal for the site is being drawn up which will be mostly residential.

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Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>Provide coach parking, public transport and more public toilets to encourage visitors to visit day/night for food &amp; entertainment.</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>Should be developed for mixed use - residential with retail. The retail units would complement and enhance the existing retail units within the town.</li> </ul>	
AKR/2 – Cheapside	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>Part of site at risk of flooding. Development should be directed to sites of lower flood risk first. Site should be removed. Part of site also occupied and thus not currently available. There needs to be clear evidence that the site should not be protected for employment purposes before a mixed use allocation is pursued.</li> </ul>	Site falls within Conservation Area and is important for its industrial history as a vinegar works. Detailed heritage study has been undertaken. Much of site should be retained for conversion as large part of site falls within floodzone 3 and redevelopment would not be an option. Allocation to be retained.
AKR/7 – Swan Hotel / Working Men's Club	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>Sport England: this site appears to include a bowling green.</li> <li>The Workmen's Club and adjacent Bowling Club are important social centres for the town and host a range of activities which require provision of adequate car parking. Some local business people have contract parking on this site.</li> <li>The whole of the Swan/Workman's Club site is indicated, I was told that this represents land ownership and the whole site is not affected. This needs significant clarification to indicate the areas involved.</li> <li>The Swan Hotel has been developed as a thriving and much needed social resource. It would be detrimental to the community if this leisure resource were to be closed down.</li> <li>Housing would worsen already congested traffic in town centre</li> <li>No walking access to rail links or reliable bus service at present.</li> <li>Why consider this site when the site at the "Bond Worths" former factory has been lying idle for so many years?</li> <li>To pursue a compulsory purchase on this site would not only deprive the people of Stourport with an important place of relaxation, but would also put several</li> </ul>	This site is currently allocated and includes social clubs / bowling greens and extensive car parking. The area to the rear of the Swan Hotel on Lickhill Road requires redevelopment to improve the streetscene. No other parts of the site would be affected.

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Site	Key Issues Raised	WFDC Officer Comments
	people out of work and should therefore be removed by WFDC from any compulsory purchase or future residential development plans	
AKR/20 – Carpets of Worth	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>• Site had planning permission for 159 units which lapsed. Is site suitable and deliverable? The allocation should be removed from the plan.</li> <li>• The access road, off Severn Road/Discovery Road is only very narrow and struggles to cope with traffic at the present time. Will this be widened for the redevelopment?</li> <li>• There will be a large increase in footfall of people wanting to get from Cheapside into the High Street area of town. Waters Edge is a private development – not a Public Right of Way. The adjacent Public Right of Way should be highlighted by signs and the Water's Edge development should have a gate erected on its entrance off Mart Lane, to stop the "traffic".</li> <li>• The roadway that comes from Tesco on to Severn Road gets very congested.</li> <li>• What provisions are there going to be made for the occupants of the new housing all over Stourport for schools and Doctors Surgeries?</li> <li>• There is reference to building an Eastern By-pass for Kidderminster, but what about a by-pass for Stourport? The whole town grinds to a standstill on good weekends, holiday times and peak times.</li> <li>• There are unrealistic assumptions of development value by the landowners. The Council might wish to consider Planning or Regeneration CPO powers.</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>• Should be developed with houses to attract people who choose to live in the Wyre Forest but their employment is within the surrounding towns and cities as they offer easy access to the main arterial roads without going through the known congestion points.</li> <li>• This brownfield site should be used before other proposed sites are utilised. Can pressure be put upon the developers to either proceed with building or relinquish the land to another developer?</li> <li>• Use site for mixed housing.</li> </ul>	This site is currently being marketed for housing development with a number of national house builders showing interest. Once sold to a developer, a fresh planning application will be submitted for determination.

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Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>I do feel these offer sufficient provision for new homes within the Stourport area. These utilise suitable land around the Carpets of Worth and Parsons Chain area without encroaching on green belt or 'open land'.</li> </ul>	
MI/1 – County Buildings	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>Rebuild health centre with better facilities on site.</li> <li>Ongoing review to relocate to emergency hub, no certainty site will be available for development. The allocation should be removed.</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>Should be developed for mixed use - residential with retail. The retail units would complement and enhance the existing retail units within the town.</li> <li>Place Partnership: WP, WMP and HWFRS support the allocation of the County Buildings site for 40 dwellings. The delivery of the new Wyre Forest Emergency Service Hub means there is certainty that the HWFRS element of the site will come forward for development. Similarly, the Place Review being undertaken jointly by the Council and PPL means that there is confidence that the site as a whole will be available for redevelopment.</li> </ul>	<p>Most of the occupants of this site have already relocated or will be relocating in the next few years. Only the health centre remains with no firm plans for relocation. The site is able to come forward on a phased basis whilst funding and a site is secured for the health centre relocation. The site will be allocated in the Local Plan for up to 40 dwellings.</p>
MI/3 – Parsons Chain	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>Parsons Chain - deliverability is questionable. Depends on need to remove former railway embankment as part of Stourport Relief Road. Site should be removed.</li> <li>Traffic – Worcester and Hartlebury roads are already heavily congested.</li> <li>Woodland – concerned about any suggested removal of the woodland on the old Railway Line behind The Birches.</li> <li>Schools – What provision is there for school places?</li> <li>Whilst applauding the use of brownfield rather than greenfield sites this particular proposal removes an edge of town employment opportunity in Parsons Chain site. The town has little employment with the exception of retail outlets.</li> <li>Should be developed with houses to attract people who choose to live in the Wyre Forest but their employment is within the surrounding towns and cities as they offer easy access to the main arterial roads without going through the</li> </ul>	<p>The railway embankment is no longer proposed for removal. Plans are being drawn up to redesign the Hartlebury/Worcester Roads junction which suffers from severe congestion. It is proposed to allocate the site for a mix of uses including employment/ care home / housing</p>

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Site	Key Issues Raised	WFDC Officer Comments
	<p>known congestion points.</p> <p>Support:</p> <ul style="list-style-type: none"> <li>• Should be developed with houses.</li> <li>• Use Parsons Chain for mixed housing and green space.</li> <li>• I do feel these offer sufficient provision for new homes within the Stourport area. These utilise suitable land around the Carpets of Worth and Parsons Chain area without encroaching on Green Belt or 'open land'.</li> </ul>	
MI/6 – Steatite Way	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>• Fears that it will increase traffic causing bottlenecks at areas in Burlish Park. More traffic means more noise and pollution - hazardous to people's health. Stourport doesn't have a good enough road infrastructure to cope with more vehicles.</li> <li>• Insufficient schools to cope with more children.</li> <li>• Insufficient GP surgeries in the town to cope with more people.</li> <li>• Loss of Green Belt land - good agricultural land.</li> <li>• Loss of wildlife - horrendous for future generations.</li> <li>• Bewdley has a bypass, Kidderminster has a ring road Stourport has nothing to alleviate traffic.</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>• Agree that MIP site should be developed for housing but not high density.</li> <li>• Use MIP site for mixed housing plus green space.</li> <li>• Support the allocation of Site Ref MI/6 (Steatite Way) for housing use. Insufficient sites within Stourport on Severn's settlement boundary to accommodate the housing needs of the town. Site is located within a sustainable location, within walking distance of a number of bus stops and approximately 10 minutes' walk from the town centre of Stourport. There are no physical constraints that prevent the site from being released for development.</li> <li>• Supports Steatite Way proposals with the provision that the exit onto Bewdley Road is improved due to several traffic accidents.</li> </ul>	<p>There is an outline application for 106 dwellings on this site which has not been determined. The site is understood to have recently been sold to a national house builder. It is a brownfield site and will be allocated in the local plan.</p>
MI/18 and MI/33 – Wilden Industrial	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>• Loss of wildlife and negative impact on Wilden Marsh.</li> </ul>	<p>MI/18 is already in use for storage. The site will be zoned for employment and removed</p>

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Site	Key Issues Raised	WFDC Officer Comments
Estate	<ul style="list-style-type: none"> <li>• Opposed to any more industrial units on Wilden Lane. Surrounded by industrial units in this area, many of which are empty. The Worcester Road has had units empty for years, why build more? There is also the Hoo Farm industrial estate and the Worcester Road premises.</li> <li>• A majority of the residents of Wilden Lane live very close to road and already suffer fast traffic speeding HGV's (over the weight limit) that are hurtling down the road at all times of the day and night and more industrial units would add to this.</li> <li>• Any industrial units will add to noise, air and road pollution and be detrimental to the road and residents.</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>• Support for the zoning of the two sites for employment purposes.</li> </ul>	from the Green Belt to regularise the situation. M1/33 is a vacant plot within the industrial estate which may be required for expansion for the neighbouring unit.
LI/5 – Burlish Crossing	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>• This area is an attractive band of farmland forming a natural barrier between Stourport and Bewdley.</li> <li>• The roads around Burlish Crossroads area is currently already subject to traffic congestion at many times of day, and the development would only exasperate this.</li> <li>• An area with no direct public transport into the nearest town, increasing car traffic and air pollution, leaving residents with no alternative means of transport.</li> <li>• The road can scarcely handle the volume of traffic currently using it, and speeding is a big problem on the run from Burlish Top to the Burlish traffic lights.</li> <li>• Stourport has no bypass, or ring road to deal with increased traffic. Congestion in the area at school times is already a significant problem.</li> <li>• Loss of Green Belt land.</li> <li>• The traffic congestion at Burlish Crossing traffic lights with long queues in all directions at rush hour. Further development will make the situation worse, without major road improvements.</li> <li>• Loss of good quality, productive agricultural land.</li> <li>• This field and the adjacent fields are an important habitat for birds, particularly in winter when lapwings gather in the area.</li> </ul>	It is not proposed to allocate this site for development in this Local Plan. The adjacent Burlish Crossing has no capacity for further expansion without widening which would require loss of existing dwellings.

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Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• Loss of an area of natural beauty and wildlife habitats.</li> <li>• Longer waiting times at doctors/dentists etc</li> <li>• Extra noise and pollution to what is a quiet neighbourhood.</li> <li>• Negative visual impact over adjacent properties. Loss of views from homes overlooking the field.</li> <li>• The need for additional housing in this area can be met from the use of existing brownfield sites.</li> <li>• Bewdley Road North is heavily congested, especially at peak times.</li> <li>• Development at Burlish field threatens nesting birds and rights of way.</li> <li>• Major traffic congestion at crossroads.</li> <li>• Lack of capacity in schools, doctors, dentists.</li> <li>• No exceptional circumstances that would justify removal of site from Green Belt. Non-Green Belt sites are available in Stourport.</li> <li>• A loss of Green Belt and precious open land which will affect wildlife populations.</li> <li>• The introduction of more traffic on already congested roads (peak periods) i.e. Kingsway, Bewdley Road, Windermere Way. More junctions causing even more traffic chaos.</li> <li>• Stourport has already catered for more people i.e. Tan Lane, Manor Road, Vale Road, which will impact on local facilities such as GPs, dentists, schools etc.</li> <li>• More traffic noise and emissions will risk the health of local residents.</li> <li>• This increase in traffic will also inevitably affect the time taken for emergency services to reach their destinations.</li> <li>• Traffic noise and higher emissions of exhaust fumes with resulting increased risk to the health of local residents.</li> <li>• Loss of wildlife habitat; there are skylarks, linnets and other red-listed birds nesting in these fields.</li> <li>• Significant impact upon the vast variety of plant and wildlife on Burlish Top Nature Reserve.</li> <li>• This area is an attractive band of farmland forming a natural barrier between Stourport and Bewdley.</li> </ul>	

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Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• The highly used Burlish Top Nature Reserve will be severely affected.</li> <li>• The bus service is already abysmal, so using the car will be a necessity.</li> <li>• No exceptional circumstances that would justify removal of site from Green Belt.</li> <li>• Stourport has no bypass, or ring road to deal with increased traffic.</li> <li>• Radical impact on property values</li> <li>• Some of this land would be better used as allotments.</li> <li>• There is no evident that there is a shortfall of housing in WFDC area which cannot be met by the using brownfield sites,</li> <li>• Concerned about retaining Stourport's character and identity</li> <li>• Crime and anti-social behaviour quite low in this area at present, extra influx of people put this at risk.</li> <li>• New areas of employment would be needed for house buyers.</li> <li>• The Council refused to allow a car boot sale on these fields a couple of years ago on the grounds that it would create too much traffic. How is it now acceptable to build so many houses without any plans to improve the road system?</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>• The development of this site is less unacceptable than sites to the north, in that the town would extend out to the boundary of the former Burlish Common, of which the field is part. The next parcel to the northeast has already been developed (including Elan Avenue).</li> <li>• Instead of LI/2, the Option B site LI/5 Burlish Crossing should be used, where it would be in closer proximity to the main road and to keep development more compact.</li> <li>• Seems to be a sensible option. Access to the town, Kidderminster and Bewdley is simple because it is on the right side of the town.</li> <li>• The whole of the western edge of Stourport, lacks any landscaping, so enhance the views across to Burlish Top.</li> <li>• Various facilities are within easy walking distance</li> <li>• Site is sustainably located. Site is suitable, developable and available. It scores well in GB Review and SA.</li> </ul>	



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Site	Key Issues Raised	WFDC Officer Comments
MI/17 – Stourport Manor	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>• Sport England: this site appears to have 2 x tennis courts and perhaps some playing field. Any losses would need to be justified under NPPF Par 74 and SE policy.</li> <li>• Exceptional circumstances need to be demonstrated to remove site from Green Belt. Non-Green Belt sites should be favoured first.</li> <li>• This is a Greenfield site with mature trees and a valuable open space which is not farmland but a rare area of grass and hedges.</li> <li>• The proposed number of houses would be too dense to be sustainable and would be inappropriate so close to Hartlebury Common.</li> <li>• There are few amenities; no shop, only a small school with limited room for expansion, no bus stop, narrow road with no pavement (Wilden Top Road is basically single track).</li> <li>• Dangerous road junction at Wilden Top Road and Hartlebury Road. Heavy lorries (Talbot Landfill) frequently use Wilden Top Road.</li> <li>• Area characterised by steep scarp above Stour valley. This site is above top of scarp. Hotel should remain as isolated building in Green Belt.</li> <li>• The current local transport infrastructure cannot support this development.</li> <li>• At peak times traffic often queues on the Hartlebury Road as far as Wilden Top Lane, also backs up along Wilden Lane from the Stourport end.</li> <li>• The junction of Wilden Top Lane and Hartlebury Road is close to a summit in the road. That would make that junction unsuitable for access to any new development On Wilden Top.</li> <li>• Bigbury Lane, (which is the main pedestrian access from existing housing at Wilden Top to Wilden Lane) has a narrow section with no footpath. This would be the primary road access to Wilden All Saints CofE Primary School, resulting in increased traffic volumes.</li> </ul>	This site is not being taken forward into the Local Plan.
AKR/14 – Pearl Lane	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>• Concerns about significant levels of growth at Areley Kings. This area is adjacent to the Malvern Hills District boundary and has already seen growth come forward within Malvern Hills District. The infrastructure implications of any site</li> </ul>	It is proposed to allocate this Greenfield (non Green Belt) site for approximately 200 dwellings. This is the maximum amount of housing that the local schools could

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 32: STOURPORT ON SEVERN

Site	Key Issues Raised	WFDC Officer Comments
	<p>allocations within this area need to be carefully considered in the context of recent and planned development on the Malvern Hills side of the administrative boundary to ensure that sufficient capacity exists.</p> <ul style="list-style-type: none"> <li>• The impact of growth on the current river Severn crossing within Stourport should be considered, particularly as there is no longer an intention to deliver the Stourport Relief Road in Local Transport Plan 4.</li> <li>• A number of issues have been raised about this site including: drainage, encroachment in the countryside, extra traffic which would lead to a new Air Quality Management Area to be implemented.</li> <li>• There is no supporting infrastructure for the development of this site and there are limited local facilities in Areley Kings.</li> <li>• Housing development here will increase the traffic crossing Stourport Bridge and using the one-way system through Stourport.</li> <li>• Development of this land would be out of keeping with the local character and detrimental to wildlife particularly in the adjacent woodland habitat.</li> <li>• Proposed development on Pearl Lane will have an adverse impact on the neighbourhood, the bridge in Stourport already struggles to cope with the amount of traffic crossing into the town centre, can take 30 minutes to get from Arley Kings into Stourport.</li> <li>• Another 420 houses will increase gridlock to an unsustainable level.</li> <li>• No pavements on Pearl Lane or Ribbesford Road so unsuitable for pedestrians.</li> <li>• Option B has no plans for added infrastructure, where are extra school places, doctors, etc needed to sustain all these extra families coming from?</li> <li>• Stourport infrastructure is not sustainable in its current state, the addition of any housing to the West of the river bridge would produce more stress to those who need to cross the river, there are no doctors surgeries on the West bank and there is only one primary school, very limited employment opportunities and only convenience shopping facilities.</li> <li>• The public transport provision is constrained along with domestic traffic by the limitations of the congested bridge and high street, which has been compounded by the addition of traffic lights to the North of the high street. It is not unusual for the queue for the bridge to reach half a mile long on holiday week end and</li> </ul>	<p>accommodate taking into consideration extant permissions. Flooding issues on the adjacent site can be addressed as part of this proposal and a large area of open space will be provided that will also serve the existing housing estate residents. Traffic modelling has shown that this number of dwellings will have minimal impact on peak traffic flows.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 32: STOURPORT ON SEVERN

Site	Key Issues Raised	WFDC Officer Comments
	<p>Fridays. Any new domestic building would result in major pressure on the existing very fragile infrastructure.</p> <ul style="list-style-type: none"> <li>• Increased pressure to the A451 / B4194 junction is inevitable if building work is undertaken on the proposed Pearl Lane side.</li> <li>• Drainage issues with site.</li> <li>• Infrastructure cannot meet the increased traffic flow over one access (the Stourport bridge).</li> <li>• This area is already congested and air pollution will increase causing health problems to the people living in this area and tourists visiting our small town.</li> <li>• The schools, GP surgeries and local hospital could not meet the needs of hundreds of new residents if they were to live in the small community.</li> <li>• Concerns about the loss of flora and fauna.</li> <li>• The site is too far away from town centre. Not a sustainable location.</li> <li>• The proposed housing site is not viable due to transport issues, financial issues and lack of services.</li> <li>• Infrastructure improvements are urgently required North of the bridge without any further development.</li> <li>• Local roads are primarily country lanes.</li> <li>• Very limited employment opportunities in the area.</li> <li>• Options of creating new job opportunities are minimal even with funding which option B does not offer.</li> <li>• Any housing developments across the bridge into Areley Kings will have an effect on the environment and the quality of life of residents.</li> <li>• The view along the valley from Areley Kings Church towards the Abberley Hills is one of middle England's finest and would be destroyed forever should building be allowed to the west of Dunley Road.</li> <li>• Another facet is the lack of public transport evenings and Sundays.</li> <li>• New residents would need to travel through Stourport and over Stourport Bridge to get to their jobs as no large employment opportunities will be created to the west of the river.</li> <li>• There is no scope to widen Stourport bridge and we are told that there is no</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 32: STOURPORT ON SEVERN

Site	Key Issues Raised	WFDC Officer Comments
	<p>possibility of an additional river crossing, so adding houses to the west of the river can only be detrimental to traffic flow through the town.</p> <ul style="list-style-type: none"> <li>• Development would be invasive to existing green field sites and expand the footprint of Stourport.</li> <li>• Unless and until money is allocated for a new bridge and relief road around Stourport, I really don't think building any more houses in Areley Kings is a viable option.</li> <li>• the LPR makes no mention of the remains of the Roman villa which lie under the Pearl Lane site. Any development would need to ensure that these remains are preserved for research and development by archaeologists in the future.</li> <li>• Part of the proposed development is upon highly productive farmland.</li> <li>• These proposals all encroach on either Green Belt or open land which we should look to retain wherever possible.</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>• Suitable and sustainable site for housing development.</li> <li>• Site is less sensitive than Green Belt sites to the north of town.</li> </ul>	
AKR/15 – Rectory Lane	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>• The fields around the area flood frequently.</li> <li>• Traffic congestion is a problem in the area.</li> <li>• The cross roads that encompasses Dunley Road is a danger spot for car accidents and there have been many traffic accidents.</li> <li>• There is not enough provision for schools, doctors, dentist on this side of the bridge as the current facilities would not handle any more residents.</li> <li>• One main concern is that the Stourport bridge is not capable of such large amounts of traffic and any further major capacity would bring the area to gridlock.</li> <li>• As building a bypass with a second bridge is so costly there must be better locations to build houses which will be financially cheaper.</li> <li>• Rectory Lane is not Green Belt but is visually sensitive as adjoins Conservation Area.</li> </ul>	This site is not being taken forward owing to adverse landscape impact.

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 32: STOURPORT ON SEVERN

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• This is not a brownfield site and is in agricultural use which could be very important after Brexit.</li> <li>• There is insufficient capacity within local schools. Local hospitals are already struggling to cope with demand.</li> <li>• The impact on congestion within Stourport and Bewdley would be unacceptable.</li> <li>• The effect on the B4194 switchback Road, already the scene of fatalities, and Areley Lane would lead to extra traffic. Areley Lane has already become dangerous due to its narrow width.</li> <li>• Pedestrian crossing on Stourport bridge is already, at times, dangerous due to there only being one pathway and its use by cyclists, mobility scooters, dog walkers, etc means that at times one has to walk in the roadway.</li> <li>• Traffic jams already stretch along the Dunley Road past Pearl Lane crossroads at peak times and the access to the Dunley Road could be difficult at times.</li> <li>• Whatever drainage is used the effect of development would lead to extra water flowing into Burnthorne Brook which would lead to additional flooding over the bridge in Areley Lane.</li> <li>• Lack of infrastructure, roads, water, schools, doctors.</li> <li>• If the construction of another bridge was feasible the main objection to the proposed sites would be removed.</li> <li>• Rectory/Pearl Lane would require extra roads even another river bridge!</li> <li>• the proposed housing sites shown are not viable due to transport issues, financial issues and lack of services.</li> <li>• Development of this land would be out of keeping with the local character and detrimental to wildlife particularly in the adjacent woodland habitat.</li> <li>• This area is adjacent to the Malvern Hills District boundary and has already seen growth come forward within Malvern Hills District.</li> <li>• no large employment opportunities will be created to the west of the river.</li> <li>• The area is also home to a large amount of wildlife including birds whose habitat would be ruined</li> <li>• would be invasive to existing green field sites and expand the footprint of Stourport.</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 32: STOURPORT ON SEVERN

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>believe that the proposed housing sites shown are not viable due to transport issues, financial issues and lack of services.</li> <li>Part of the proposed development is upon highly productive farmland.</li> <li>Development along Rectory Lane would spoil a quiet country walk and the unspoilt scenery.</li> <li>lack of public transport evenings and Sundays</li> <li>Local roads are primarily country lanes.</li> <li>Any development to the west of the river Severn would carry such massive infrastructure costs.</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>Site is suitable, deliverable and developable.</li> <li>Site has good access to local services and Stourport town centre via number of routes.</li> <li>Access can be provided by upgrading existing service road off Dunley Road. Connections along Ribbesford Road and Rectory Lane could be provided to link into existing rights of way.</li> <li>Regular bus services run along Dunley Road into Stourport and Kidderminster.</li> <li>Nearby facilities are within walking distance from site.</li> </ul>	
General Comments	<ul style="list-style-type: none"> <li>The Wyre Forest is an attractive place to live and it is in danger of losing its character and charm if it is extended beyond recognition.</li> <li>None of the options indicates improvement to the road structure in and around Stourport.</li> <li>There was no indication of the type of housing that will be built.</li> <li>Infrastructure cannot cope with the volume of traffic and congestion. Schools and Doctor surgeries are already struggling.</li> <li>Stourport could only cope with the extra volume if a second bridge were to be built over the River Severn.</li> <li>Until the council can come up with a plan and the funds to improve the roads and facilities in the Burlish, Lickhill and Kingsway area of Stourport, the idea of building houses as should be scrapped.</li> <li>Ask people on beforehand where THEY think more houses (especially social</li> </ul>	All allocations have been carefully assessed in terms of impact on highways and available capacity in schools. A review of replacement GP surgeries is being investigated independent of this Local Plan process.

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 32: STOURPORT ON SEVERN

Site	Key Issues Raised	WFDC Officer Comments
	<p>housing) could be built.</p> <ul style="list-style-type: none"> <li>• Object to all these sites as in Green Belt, plenty of brown sites still available.</li> <li>• There are sufficient brownfield sites everywhere in Wyre Forest area to accommodate housing needs.</li> <li>• The plan mentions the traffic issues relating to land to the West of Stourport and then proposes to allocate land there - this doesn't seem logical.</li> <li>• It is important that the strategic gap between Stourport and Kidderminster should not be eroded</li> <li>• Stourport has also lost valuable facilities in recent times. It is ludicrous that a town with a river has no swimming facilities for teaching children.</li> <li>• Some sites are close to designated sites and will require particular care in delivery.</li> <li>• Need to determine any ecological constraints that may exist using up to date survey information.</li> <li>• Do not think any homes should be built in Stourport until the ring road that has been talked about for years is put in place.</li> <li>• Appreciate the necessity to provide sites for the Districts housing allocation. However, it is concerning that it is felt this can only be achieved at the expense of the Green Belt.</li> <li>• Further development on the edges of the town would cause deterioration of a valuable landscape.</li> <li>• The document does not seem to appreciate the role of Stourport in the District's economy.</li> <li>• Frequent mention is made of promoting heritage tourism in Stourport but there is no mention of encouraging the facilities to support this, e.g. toilets, parking and provision of facilities for visiting coaches.</li> <li>• There is little mention of sustainable transport proposals in the document, the assumption being made that travel from Stourport area both within and beyond the district will be primarily road based.</li> <li>• Pleased to see, in Stourport on Severn, that there is a wide range of generally smaller sites being considered for allocation and this will assist house builders of all shapes and sizes to be able to access land for development.</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 32: STOURPORT ON SEVERN

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"><li>• hugely opposed to any more industrial units on Wilden lane</li><li>• Through traffic needs to be diverted away from the one way system and back to the A449.</li></ul>	



## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 33: BEWDLEY

Site	Key Issues Raised	WFDC Officer Comments
WA/BE/1 – Stourport Road Triangle	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>• Impact it will have on the already chaotic traffic congestion and parking problems generated by nearby school and sports centre.</li> <li>• Concern about the addition to chaos and danger to school children on the Stourport Road.</li> <li>• Current parking and congestion has not been solved in this area.</li> <li>• An addition of 100 dwellings would add to the danger and risk that is currently faced by parents and school children.</li> <li>• The land should be retained for community use.</li> <li>• The Green Belt should not change in this location.</li> <li>• 100 new homes is far too many for this part of Bewdley.</li> <li>• The area is prone to flooding.</li> <li>• There is lots of wildlife around the area including bats, owls, skylarks.</li> <li>• The local schools are already full to capacity.</li> <li>• The local medical centre and hospital is already overworked.</li> <li>• Loss of open visual aspect from neighbouring properties.</li> <li>• The Public Footpath along Riddings Way should be preserved.</li> <li>• A comprehensive assessment of community need is required before land in this area is committed for housing and mitigating measures should be included to offset the current and potentially worsening traffic and parking issues.</li> <li>• Where is the Green Belt going to end? Are we just going to join with Stourport and Kidderminster?</li> <li>• I hope that the old redbrick wall that runs alongside the proposed site and next to the public footpath be preserved.</li> <li>• Site is currently actively farmed/used land and so developing housing on this land is not safeguarding this Green Belt, in contradiction of policy 6B.</li> <li>• Disruption to the eco system/wildlife, may affect Riddings Brook footpath.</li> <li>• Unfair allocation and there must be other options the other side of the river.</li> <li>• A significant intrusion into the green gap between Bewdley and Stourport.</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>• There are insufficient sites within Bewdley's settlement boundary to</li> </ul>	<p>This site is proposed for removal from the Green Belt and allocation for up to 100 dwellings. The public footpath will be retained and the Riddings Brook opened up and naturalised. The remaining wall from the walled garden to Sandbourne House will be retained and this end of the site will form a large area of open space with pedestrian access through the 'gate' in the wall. The site has good flat access to local facilities.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 33: BEWDLEY

Site	Key Issues Raised	WFDC Officer Comments
	<p>accommodate the housing needs of the town.</p> <ul style="list-style-type: none"> <li>• The site is a kilometre from the town centre and access to the town centre is easily achieved along well-lit pavements on a flat plain.</li> <li>• The site is opposite the town's leisure centre and is one hundred metres' from the nearest secondary and primary schools.</li> <li>• The site is readily accessible to local services and facilities by foot and local bus services. As such, it is a highly sustainable location for housing development.</li> <li>• There are no physical constraints that prevent the site being released for development.</li> <li>• The site represents one of the best opportunities to release a discreet parcel of land which will not intrude upon the wider landscape and which is also able to achieve a high degree of sustainability in terms of its connectivity to the town centre and other important local services, notably schools and the leisure centre.</li> <li>• The housing should be a mix of affordable homes, homes for the elderly and private housing.</li> </ul>	
WA/BE/5 – Land south of Habberley Road	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>• Already too much traffic along this end of Habberley Road to permit building of 45 dwellings on this land. A smaller number would be more reasonable.</li> <li>• The site would need a road through to meet the round about of the by pass taking traffic away from the houses at this end of Habberley Road. This would also relieve build up of traffic at the no right turn at Catchems End, and the volume of traffic along Bewdley Road because of the enforced left turn.</li> <li>• Traffic flow along Habberley Road has increased greatly. Further development will lead to more traffic on a road that is not wide enough to take it.</li> <li>• The proposed development will be on a road that is already very busy and often dangerous road that gets congested that causes problems for the residents and other road users.</li> <li>• The poorly thought out junction at Catchems End causes many traffic hold ups.</li> <li>• Drainage issues on site.</li> <li>• Impact on openness of Green Belt. The importance of preventing the coalescence and maintaining a Green Belt gap between Bewdley and</li> </ul>	<p>This site is proposed for removal from the Green Belt and allocation for up to 35 dwellings. Access will be in the form of a cul-de-sac from Habberley Road. Further investigation into drainage issues is underway. A wide green buffer will mark the new Green Belt boundary.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 33: BEWDLEY

Site	Key Issues Raised	WFDC Officer Comments
	<p>Kidderminster.</p> <ul style="list-style-type: none"> <li>The site is near to the Mercure Hotel and would not enhance the area to prospective clients.</li> <li>Plans for the Safari Park hotel will increase traffic in this area.</li> <li>Schools/GPs will not cope.</li> <li>Concerns that consent for development of the site would pave the way for future developments on adjoining land.</li> <li>The road system barely copes as it stands and will no longer be a small country town.</li> <li>This is a low lying piece of land which is frequently waterlogged, and it may not be possible to naturally drain surface water into any local watercourse and to pump could be an expensive option.</li> <li>Damage to the local environment/wildlife.</li> <li>Planning history shows a potential bronze age burial mound.</li> <li>Site is currently actively farmed/used land and so developing housing on this land is not safeguarding this Green Belt, in contradiction of policy 6b.</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>This site encroaches into the Green Belt in a relatively narrow gap between Bewdley and Kidderminster. If a developer provided a link road between Habberley Road and Kidderminster Road then release of site from Green Belt would be acceptable.</li> </ul>	
BR/BE/6 – Land off Highclere	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>Development of this site would increase traffic through Welch Gate. Development should be avoided West of the River Severn in Bewdley to avoid adding to the increasing congestion and air quality problems already faced by the town.</li> <li>Main access from the town to the site will be Park Lane. This is already a very busy road (particularly at peak school times) and poses serious threat to pedestrians utilising the route. An increase in traffic flow will therefore increase this risk.</li> <li>Ecological Importance of the site. Ancient Woodland is present to the south of</li> </ul>	This site is no longer proposed for allocations owing to biodiversity and drainage issues. See Site selection paper and Sustainability Appraisal

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 33: BEWDLEY

Site	Key Issues Raised	WFDC Officer Comments
	<p>the proposed area for development. Housing and increased 'hard landscaping' will produce run off which will ultimately produce pollution and undue pressure on Snuff Mill Brook.</p> <ul style="list-style-type: none"> <li>• To walk into Bewdley is dangerous down Park Lane with no footpath and the climb back up Park Lane or Wyre Hill is daunting and many would be unable to tackle it. To catch a bus they would have to walk up and down from Hales Park, which again is not practical for many, especially with heavy shopping.</li> <li>• Development in the Highclere area would inevitably add more traffic passing through the Welchgate / top of Load Street area which is an Air Quality Management location. Any additional air pollution in this area should be avoided and additional traffic would only make the air quality worse.</li> <li>• Development off Highclere would lead to serious accidents on roads - narrow and twisty, no pavements. Unsuitable proposal.</li> <li>• Loss of amenity land. Site is well used for recreational pursuits – dog walking, informal play.</li> <li>• Impact on traffic flow through Bewdley. It's on top of the hill, so although within 0.5 mile of Load street, not easily accessible. Very unlikely that new residents (especially elderly) would walk down and back up after visiting the shops.</li> <li>• The land is a habitat for wildlife and should be preserved.</li> <li>• The site has high landscape value the water run off into Snuff Mill Brook would have a detrimental effect.</li> <li>• Access in / out of the site is unsuitable for any increase in traffic.</li> <li>• Additional traffic generated by development in Highclere would cause gridlock in this area.</li> <li>• Both Park Lane and Wyre Hill roads are dangerous and narrow and cannot do with increased traffic of any kind.</li> <li>• Loss of land of recreational and amenity use, including environmental and nature aspects.</li> <li>• For every property built there will be a minimum of two vehicles and no bus service as the access is unsuitable for large vehicles.</li> <li>• Develop the area as a nature reserve, as an asset to Bewdley.</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 33: BEWDLEY

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• It is foolish to extend the urban sprawl further west into open countryside.</li> <li>• There is no road link between Hernes Nest/Highclere; there is no through road.</li> <li>• This particular site can be seen right across the valley and any development would impinge greatly on the views.</li> <li>• These green fields are a buffer to heavy traffic on the bypass and consequent air pollution, provide a pleasing appearance to the entrance to Bewdley town as well as provide an important green space for wildlife.</li> </ul>	
WA/BE/3 – Catchems End	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>• The site is within Green Belt and makes significant contribution. Development would reduce openness and urbanise land.</li> <li>• It will seriously diminish the openness of this narrow and highly sensitive part of the Green Belt between Kidderminster and Bewdley.</li> <li>• This proposal is seen to compromise the established Green Belt principles of preventing coalescence, sprawl and encroachment and the preservation of the setting and special character of the historic town Bewdley.</li> <li>• Western section of site adjoins church (listed building) and is partly in flood zone 3.</li> <li>• This proposal would bring a huge amount of extra traffic to the area at the Kidderminster Rd end of the Bewdley by-pass. This will be exacerbated by the proposals for future development at West Midlands Safari Park.</li> <li>• The field next to All Saints Church is a 'green' landmark in Wribbenhall and needs to be protected as should be the wall bordering it. Both are part of the local heritage.</li> <li>• The addition of so many dwellings will put immense pressures on local resources causing crowded schools and crippling the transport network. The town would have its tourist industry affected by not being able to visit when roads are gridlocked.</li> <li>• The section of Kidderminster Road from Catchems End Chip Shop to the by-pass island is very congested most of the day and any additional traffic would only make matters worse especially when you add the traffic from the new WMSP Hotel.</li> </ul>	<p>This land is proposed for removal from the Green Belt and allocation for 76 dwellings. Much of the development will be kept to the rear of existing dwellings on Kidderminster Road so that the entrance to Bewdley still has a rural feel. The western parcel will be retained as public open space with the Riddings Brook opened up into a more natural corridor with a footpath/cycle link alongside connecting through to the proposed development.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 33: BEWDLEY

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• The A456 and B4129 in Wribbenhall are already very busy, and to build new homes in this area would cause even more congestion.</li> <li>• To build more houses in this area at a time when services are stretched makes no sense. We are seeing cuts to Fire Services, Health Service and Schools.</li> <li>• Would schools in our area be able to accommodate the new families new houses would bring?</li> <li>• Loss of open aspect from neighbouring properties.</li> <li>• Would like space adjacent to Wribbenhall Church to remain as open space.</li> <li>• Hill at Maypole Piece should be retained as undeveloped land. Any floodable land should only be used as open space.</li> <li>• This site would make a significant contribution to the housing need, would not have a significant detrimental effect on the landscape and have easy and safe access to main roads and pavement access to schools.</li> <li>• Impact on tourism in Bewdley. Concerned that Bewdley needs to be careful not to morph into a community suburb. Impact on sense of community if more people commute from Bewdley.</li> <li>• Impact on local infrastructure - schools and local transport.</li> <li>• The area to the rear of Lodge Close historically floods. The gardens of some properties in Lodge Close are consistently under a considerable amount of water for most of the winter.</li> <li>• Site is currently actively farmed/used land and so developing housing on this land is not safeguarding this Green Belt, in contradiction of policy 6B.</li> <li>• Affect on approach to town/sprawl effect of built up environments.</li> <li>• Whilst there is no "right to a view" in legal terms, is loss is not necessarily irrelevant when it comes to planning permission.</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>• Southern End adjoining All Saints Church. Support for a very modest number of houses on the southern end of this site but any development should provide housing, a cemetery extension, car parking for the church/town, and an area of public open space to mitigate its loss of openness and take account of</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 33: BEWDLEY

Site	Key Issues Raised	WFDC Officer Comments
	<p>drainage issues.</p> <ul style="list-style-type: none"> <li>• Would prefer site WA/BE/3 Catchems End to be designated for housing instead of site BR/BE/6 Land off Highclere.</li> <li>• Catchems end development would be more suitable than Highclere, as Catchems End gives direct access to the road network.</li> <li>• The site is in close walking distance to a number of local facilities including three public bus routes which run regular services.</li> <li>• The site at Catchems End would be able to provide appropriate contribution to support improvements to the local highways improvements, associated with the impacts of the development.</li> <li>• The site can contribute 3.48 hectares of public open space to the community</li> </ul>	
General Comments	<ul style="list-style-type: none"> <li>• The Bewdley Fire Station site should be carried forward into Policy 33.</li> <li>• There is a need for housing but Bewdley is full up so not possible.</li> <li>• Welch Gate is the most polluted spot in the Wyre Forest because of emissions. What is being done to solve the issue of poor air quality in the town centre and the traffic congestion in Welch Gate?</li> <li>• Object to any large-scale housing west of the river</li> <li>• Suggest a policy for the redevelopment and/or enhancement of: <ul style="list-style-type: none"> <li>○ The riverside buildings from Bridge House to the Rowing Club, perhaps to provide additional housing and car parking.</li> <li>○ The Workhouse site in High Street</li> </ul> </li> <li>• It is surely more sensible to have a plan that would not disrupt an area that already has a traffic problem particularly at holiday times.</li> <li>• Areas that have better links to major roads and good public transport would be more sensible than those shown for the Bewdley area.</li> <li>• Would it not be more viable to create say a new town with new infrastructure that would then be viable rather than overloading existing?</li> <li>• How would the Medical Centre and the schools cope?</li> <li>• With young families moving into the area we need to ensure that there is ample green space for them</li> <li>• We wish to support the development of Bewdley, as outlined in policy 33 and the core sites identified.</li> </ul>	<p>Fire Station site and land to the rear is proposed for allocation</p> <p>If access could be improved, this area may be suitable for formal car park provision. Some of this area is prone to flooding and so would not be suitable for further residential development.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 33: BEWDLEY

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• Wribbenhall will have to bear the development – they may assist with road costs i.e. Safari Park.</li> <li>• Area between town and Forest is very sensitive.</li> <li>• It would make sense, therefore to favour sites for future housing development which are as near as possible to Kidderminster to help minimize miles travelled.</li> <li>• It would seem sensible to confine Bewdley's future housing development to sites east of the river until those sites are fully saturated.</li> <li>• Bewdley already has substantial traffic and air pollution problems due in substantial part to the amount of housing east of the town centre,</li> <li>• Bewdley must take on a supportive role to Kidderminster in the provision of housing,</li> <li>• object to the limited scale of growth that is currently proposed from housing allocations in Bewdley and consider it necessary to plan for further development in order to fully support the economic and housing needs of the area.</li> <li>• Plan only proposes 4.6% of dwellings in Bewdley. Core Strategy proposed 10%.</li> <li>• Bewdley centre has lots of empty commercial buildings that should be changed into high quality living accommodation.</li> <li>• If development of <b>any</b> green field land is considered essential, then the identified spaces on the Kidderminster side of Bewdley seem to be the least bad option.</li> <li>• Will the old wall Sandbourne drive be kept intact, or will this also be knocked down and lose more of Bewdley's character.</li> <li>• The whole of Wribbenhall will be a block of houses from Catchems End right down to The Great Western, and from Old Styles' Mill right up to the now Stourport Triangle. No greenery, no fields, no hedges, no trees, just houses.</li> </ul>	<p>Any proposals for conversion of upper floors of commercial buildings can come forward under current planning policy.</p> <p>Policy is for all developments &gt;2 Ha to provide 40% as green infrastructure. This will help to ensure any existing hedgerows and trees are not only retained but that additional planting is carried out to enhance developments for the benefit of both residents and wildlife.</p>



## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 35: RURAL WYRE FOREST

Site	Key Issues Raised	WFDC Officer Comments
WA/UA/4 – Allotments, Upper Arley	<p>Support:</p> <ul style="list-style-type: none"> <li>Development of this site would be acceptable if the allotments are genuinely redundant.</li> <li>All the houses (not just some of them) should be affordable houses, of a smaller design, and for the people of the Parish.</li> </ul>	This site will be brought forward in consultation with the Parish Council to ensure that the provision meets local requirements.
BR/RO/1 – Land at Clows Top	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>The housing allocation at Clows Top for 30 dwellings needs to be considered in the context of the SWDP which allocates land adjacent to Highbrae for 17 dwellings and any proposals coming forward from Shropshire Council in order to ensure that adequate infrastructure is provided and to avoid an over concentration of development within the village.</li> <li>Strong objections to use of site for Travelling Showpeople. Would prefer something for the community or low cost housing for locals.</li> <li>No main drainage to site.</li> <li>Dangerous crossroad next to site.</li> <li>Limited visibility on exit of proposed site.</li> <li>A456 is already dangerous due to speeding.</li> <li>Lack of schools, doctors etc.</li> <li>Difficult access to and from the site, turning in and out would be difficult.</li> <li>The land on the site is unstable and is falling away. There is movement around the perimeter of the site, this before any heavy vehicles and trailers are using the area.</li> <li>There is a lack of adequate access to services and utility infrastructure</li> <li>The cumulative impacts of the site would harm the character and appearance of the area.</li> <li>I think it is affordable housing we need at Clows Top.</li> <li>There are four other sites identified in the plan for Travelling Showpeople all of which are more suited to this purpose.</li> <li>Land would be better served to the community as it is i.e. a garage or similar which would offer a service which would benefit residents.</li> <li>Little public transport.</li> </ul>	A decision has been taken to remove this site from the Local Plan as it is not considered viable to bring forward owing to the cost of connecting the site to mains drainage. The site is currently in commercial use.

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 35: RURAL WYRE FOREST

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>No local police or hospital.</li> <li>Should be kept as a core housing site and not used for Travelling Showpeople.</li> <li>Would like to see something for the community.</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>Support residential development on this site because it will help to sustain the village and local community.</li> <li>Support for affordable housing on site to encourage young people to stay in the village and help sustain local businesses and services.</li> <li>Would like to see houses built here for local families.</li> <li>This housing development is indeed supported by the majority of all within the village parish.</li> </ul>	
BR/RO/4/6 – Land adjacent Tolland, Far Forest	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>Local amenities cannot cope with existing housing</li> <li>Plough Lane would need to be widened.</li> <li>Increased traffic congestion</li> <li>Negative impact on countryside.</li> <li>Current sewerage systems would not be able to cope with new development.</li> <li>Site is landlocked with narrow entrance.</li> <li>Development of Orchard House land would have to be accessed off Plough Lane. Road is heavily used by lorries (especially from quarries) and residents of Cleobury Mortimer plus school traffic.</li> <li>Bus service is unreliable and infrequent.</li> <li>Countryside and natural habitats will be lost. Habitat of rare species. Beautiful ancient orchards will be replaced by houses.</li> <li>The damage to wildlife and natural habitats will be incalculable.</li> <li>It would not be inappropriate to also develop land to the east of Plough Lane.</li> <li>Detrimental impact on character and landscape of this area.</li> <li>Egress from Plough Lane onto Cleobury Road (A4117) is dangerous and at a steep incline with limited views in either direction.</li> <li>Risk of flooding to proposed properties and existing properties.</li> <li>Loss of Dark skies. These are very much part of our village, important to its</li> </ul>	<p>The decision has been taken not to allocate these sites through this Local Plan. Further ecological assessment has been undertaken and the final report is awaited. If when the housing needs survey for Rock Parish is updated a requirement is found that cannot be accommodated elsewhere, these sites may need to be reconsidered. Only very limited development would be allowed with the potential to develop the orchard further for the benefit of the wider community.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 35: RURAL WYRE FOREST

Site	Key Issues Raised	WFDC Officer Comments
	<p>character. Dark skies are also of great importance to wildlife.</p> <ul style="list-style-type: none"> <li>• Very little local employment. People to go further afield, again increase of carbon footprint.</li> <li>• Increase in noise, light and air pollution that would have a negative effect on the health of local residents.</li> <li>• Storm water currently a problem and would be heightened due to any development.</li> <li>• Do not need any more houses in Far Forest – there are plenty for sale.</li> <li>• School is full.</li> <li>• Proposed development at Far Forest is approximately six acres which is huge compared with the rest of the village and contrary to Policy 6F.</li> <li>• The village has no public "green space" despite being out in the country.</li> <li>• Building out at Far Forest will create car commuter traffic to Kidderminster and the West Midlands.</li> <li>• The Council should consider redefining the boundary of the village.</li> <li>• The infrastructure at present cannot cope with more residents. GP surgeries, Fire and Ambulance services are all stretched.</li> <li>• Sewerage and water has been a problem in the village for a long time; electricity can also be a problem with innumerable power cuts.</li> <li>• There is no indication of need for this level of housing locally.</li> <li>• Wyre Forest rural development is disproportionately centred on Far Forest with 60 of 105 (57%) of properties proposed here.</li> <li>• A full independent wildlife study and a Habitats Regulations Assessment (HRA) needs to be carried out on these sites. There may be endangered species local to this area.</li> <li>• Negative impact on the character of the village and its ecology:</li> </ul> <p>Support:</p> <ul style="list-style-type: none"> <li>• Land at Tolland Bungalow and Orchard House - Plough Lane is more of a track. Site is appropriate infill site but may need to be limited to about 5 dwellings. Orchard House site - acceptable for infill but not to be accessed off A4117.</li> </ul>	

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 35: RURAL WYRE FOREST

Site	Key Issues Raised	WFDC Officer Comments
BR/RO/7 – New Road, Far Forest (S) (N)	<p>Objections/Comments:</p> <ul style="list-style-type: none"> <li>• Traffic is already horrendous and will be made worse with more dwellings.</li> <li>• Dangerous junction on to main road.</li> <li>• Congestion along New Road at school times and too many parked cars.</li> <li>• Children at risk due to traffic increase.</li> <li>• Lack of services locally (doctors etc.) - leading to pollution as people would have to travel to appointments by car.</li> <li>• Bus service is unreliable and route is awful; takes over an hour to get to Kidderminster.</li> <li>• No jobs locally - again causing more pollution as they will have to travel.</li> <li>• Countryside and natural habitats will be lost.</li> <li>• Village too small - not enough facilities.</li> <li>• Views will be spoilt.</li> <li>• Brownfield sites in Kidderminster could be used.</li> <li>• Sewage system is inadequate at the moment and would not be able to cope with the additional dwellings.</li> <li>• Loss of agricultural land and wildlife.</li> <li>• Facilities in Far Forest are not suitable for an increase in population as it will cause more traffic and pollution.</li> <li>• Stress on utilities, localised flooding and poor sewerage system, no mains gas currently in village.</li> <li>• Low water pressure.</li> <li>• Insufficient broadband.</li> <li>• Doctors already over subscribed.</li> <li>• Negative impact on the village, currently a small rural village, will become a housing estate.</li> <li>• Village has no public green space.</li> <li>• Negative impact on tourism.</li> <li>• Housing not needed in Far Forest.</li> <li>• People enjoy the current countryside - local people would not have any benefit from the proposals.</li> </ul>	<p>This site has been ruled out for future development on highways and biodiversity grounds.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 35: RURAL WYRE FOREST

Site	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• 50 additional houses would simply overwhelm the village and the character of the village would be lost to the detriment of the current residents.</li> <li>• Loss of Dark skies and detrimental impact on flora and fauna.</li> <li>• School is full.</li> <li>• Bungalows rather than houses could be built elsewhere in the village.</li> <li>• Far Forest is an open and widespread rural settlement. The proposed developments would urbanize the village.</li> <li>• No local Police, Fire or Ambulance service.</li> </ul>	
General Comments	<ul style="list-style-type: none"> <li>• The majority of sites proposed under this policy have likely biodiversity implications and so we reiterate the need to determine any ecological constraints that may exist on any of the sites listed under this policy using up to date survey information.</li> <li>• The plan does not provide sufficiently for windfall housing sites in areas in the west of Kidderminster, beyond Bewdley.</li> <li>• The plan should review all the local settlement boundaries to establish the extent to which small additional sites might contribute to the significant housing problem.</li> <li>• PDL within the Green Belt at Cursley Distribution Park could be made available through site rationalisation. This would require the land to be released from the Green Belt and allocated under Policy 35.</li> <li>• Potential loss of wildlife and harm to the landscape.</li> <li>• Various protected species are located on the proposed development land.</li> <li>• Harm to the Landscape Protection &amp; Hedgerows.</li> <li>• Concern at the increase of traffic.</li> <li>• Sewerage System in Far Forest is still a major ongoing issue.</li> <li>• All sustainable settlements should be allowed to play their part in meeting their own housing and employment needs.</li> <li>• support the redevelopment of Alton Nurseries.</li> <li>• New estates are not needed.</li> <li>• Local employment ideas are to be commended. However, WFDC must be careful not to negate agricultural/rural opportunities by removing arable/other</li> </ul>	<p>The decision has been taken to amend settlement boundaries in the west of the district (outside of the Green Belt) to allow for limited infill development of up to 6 dwellings.</p> <p>Cursley Distribution Park is to be allocated as a Previously Developed Site in the Green Belt for employment.</p> <p>Alton Nurseries will be redeveloped with 4 dwellings along the front of the site with the remainder of the site allocated for employment uses as an extension to Bewdley Business Park.</p>

## LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO SECTION 35: RURAL WYRE FOREST

Site	Key Issues Raised	WFDC Officer Comments
	agricultural land.	