

Open

Overview & Scrutiny Committee

Agenda

6pm
Thursday, 4th July 2019
Council Chamber
Wyre Forest House
Finepoint Way
Kidderminster



Overview & Scrutiny Committee

Members of Committee:

Chairman: Councillor M J Hart
Vice-Chairman: Councillor S J Chambers

Councillor N J Desmond
Councillor S Griffiths
Councillor M Rayner
Councillor D R Sheppard

Councillor C E E Edginton-White
Councillor T L Onslow
Councillor S E N Rook
Councillor A Totty

Would Members please note that, to ensure continuity in scrutiny, substitutes should only be appointed for the Scrutiny Committee in exceptional circumstances.

Information for Members of the Public:

Part I of the Agenda includes items for discussion in public. You have the right to inspect copies of Minutes and reports on this Agenda as well as the background documents used in the preparation of these reports.

Part II of the Agenda (if applicable) deals with items of "Exempt Information" for which it is anticipated that the public may be excluded from the meeting and neither reports nor background papers are open to public inspection.

Declaration of Interests by Members – interests of members in contracts and other matters

Declarations of Interest are a standard item on every Council and Committee agenda and each Member must provide a full record of their interests in the Public Register.

In addition, alongside the Register of Interest, the Members Code of Conduct ("the Code") requires the Declaration of Interests at meetings. Members have to decide first whether or not they have a disclosable interest in the matter under discussion.

Please see the Members' Code of Conduct as set out in Section 14 of the Council's constitution for full details.

Disclosable Pecuniary Interest (DPI) / Other Disclosable Interest (ODI)

DPI's and ODI's are interests defined in the Code of Conduct that has been adopted by the District.

If you have a DPI (as defined in the Code) in a matter being considered at a meeting of the Council (as defined in the Code), the Council's Standing Orders require you to leave the room where the meeting is held, for the duration of any discussion or voting on that matter.

If you have an ODI (as defined in the Code) you will need to consider whether you need to leave the room during the consideration of the matter.

Co-opted Members

Scrutiny Committees may wish to appoint Co-Opted Members to sit on their committee in order to add value to the scrutiny process. To appoint a Co-Opted Member, a Committee must first agree to appoint either a specific person or to approach a relevant organisation to request that they put forward a suitable representative (e.g. the local Police Authority). Co-Optees are non voting by default but Committees can decide to appoint voting rights to a Co-Optee. The Co-Option of the Member will last no longer than the remainder of the municipal year.

Scrutiny Committees can at any meeting agree to terminate the Co-Option of a Co-Opted Member with immediate effect. Where an organisation is appointed to put forward a Co-Opted Member, they are able to send a substitute in exceptional circumstances, provided that they notify Democratic Services in advance. Co-Opted Members must sign up to the Members Code of Conduct before attending their first meeting, failure to sign will mean that they are unable to participate. This also applies to substitute Co-Opted Members, who will need to allow sufficient time before a meeting in order to sign the Code of Conduct.

The following will apply:

- i) The total number of voting co-opted members on any Scrutiny Committee will not exceed 25% at any one time.
- ii) The total number of voting Co-opted Members on any Review Panel will not be limited.
- iii) Those Co-opted Members with voting rights will exercise their rights in accordance with the principles of decision making set out in the constitution.

For Further information:

If you have any queries about this Agenda or require any details of background papers, further documents or information, you should contact Louisa Bright, Principal Committee and Member Services Officer, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF. Telephone: 01562 732763 or email louisa.bright@wyreforestdc.gov.uk

Wyre Forest District Council
Overview & Scrutiny Committee

Thursday, 4th July 2019

Council Chamber, Wyre Forest House, Finepoint Way, Kidderminster

Part 1

Open to the press and public

Agenda item	Subject	Page Number
1.	Apologies for Absence	
2.	Appointment of Substitute Members To receive the name of any Councillor who is to act as a substitute, together with the name of the Councillor for whom he/she is acting.	
3.	Declarations of Interests by Members In accordance with the Code of Conduct, to invite Members to declare the existence and nature of any Disclosable Pecuniary Interests (DPI's) and / or Other Disclosable Interests (ODI's) in the following agenda items and indicate the action that they will be taking when the item is considered. Please see the Members' Code of Conduct as set out in Section 14 of the Council's Constitution for full details.	
4.	Minutes To confirm as a correct record the Minutes of the meeting held on the 13th June 2019.	7
5.	Wyre Forest District Local Plan: Pre-Submission Publication To consider a report from the Spatial Planning Manager which sets out the documentation for re-opening the Local Plan Pre-Submission Publication consultation, referred to as the Regulation 19 consultation. <i>Please be advised that appendices 2 and 4 have been circulated electronically.</i>	10
6.	Treasury Management Review Panel To request nominations for membership of the Treasury Management Review Panel for the current municipal year. Meeting dates: <ul style="list-style-type: none">Monday 2nd September 2019 – 4pm Training for all Members, 6pm meetingMonday 4th November 2019 – 6pm meetingMonday 3rd February 2020 - 4pm Training for all Members, 6pm meeting	

7.	Feedback from Cabinet To note the content of the Cabinet action list, following consideration of the recommendations from its meeting on 19 th June 2019.	88
8.	Work Programme To review the work programme for the current municipal year with regard to the Corporate Plan Priority, Annual Priorities and the Forward Plan.	89
9.	Press Involvement To consider any future items for scrutiny that might require publicity.	
10.	Asset Management Strategy To consider a report from the Corporate Director: Economic Prosperity and Place which sets out a proposal to agree the adoption of an Asset Management Strategy, as part of the Capital Strategy, to guide the Council in the overall management of assets within its developing portfolio of assets acquired through the Capital Portfolio Fund.	90
11.	To consider any other business, details of which have been communicated to the Solicitor of the Council before the commencement of the meeting, which the Chairman by reason of special circumstances considers to be of so urgent a nature that it cannot wait until the next meeting.	
12.	Exclusion of the Press and Public To consider passing the following resolution: “That under Section 100A(4) of the Local Government Act 1972 the press and public be excluded from the meeting during the consideration of the following item of business on the grounds that it involves the likely disclosure of “exempt information” as defined in paragraph 3 of Part 1 of Schedule 12A to the Act”.	

Part 2

Not open to the Press and Public

13.	Agenda Item No. 10 Asset Management Strategy Appendix 2 – Appendices to the Asset Management Strategy.	
14.	Disposal of Land in Stourport To consider a report from the Corporate Director: Economic Prosperity and Place which sets out a proposal for a disposal of Land in Stourport.	

15.	To consider any other business, details of which have been communicated to the Solicitor of the Council before the commencement of the meeting, which the Chairman by reason of special circumstances considers to be of so urgent a nature that it cannot wait until the next meeting.	
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WYRE FOREST DISTRICT COUNCIL

OVERVIEW & SCRUTINY COMMITTEE

COUNCIL CHAMBER, WYRE FOREST HOUSE, FINEPOINT WAY, KIDDERMINSTER

THURSDAY, 13TH JUNE 2019 (6PM)

Present:

Councillors: M J Hart (Chairman), S J Chambers (Vice-Chairman), C J Barnett, N J Desmond, C E E Edginton-White, S Griffiths, T L Onslow, M Rayner, S E N Rook and A Totty.

Observers

Councillors: G W Ballinger, S Miah and J W R Thomas.

OS.01 Apologies for Absence

Apologies for absence were received from Councillor D R Sheppard.

OS.02 Appointment of Substitutes

Councillor C J Barnett was appointed as a substitute for Councillor D R Sheppard.

OS.03 Declarations of Interests by Members

Councillor C Edginton-White declared a Disclosable Pecuniary Interest (DPI) in agenda item no. 6 - Wyre Forest District Local Plan: Revised Local Development Scheme (Project Plan 2019-21), and would leave the meeting whilst the item was discussed.

OS.04 Minutes

Decision: The minutes of the meeting held on 7th March 2019 and the minutes of the Overview and Scrutiny Sub-Committee meeting held on 30th April 2019 be confirmed as a correct record and signed by the Chairman.

Councillor C Barnett entered the meeting at this point, (6.01pm).

OS.05 How Are We Doing? Performance Update

The Committee considered a report from the Business Improvement Officer which updated Members on the performance of the Council for quarter 4 from 1st January to 31st March 2019.

The Business Improvement Officer presented the report and appendices which included an exception report for those actions that were approaching their due date or were overdue, detailed reports on the performance against the Council's purposes of Planning and Housing, and a report on the Capital Projects.

The Committee considered each page of the report and appendices in turn. A Member asked for a further update on WFF 18/19 78 Universal Credit; the Business Improvement Officer advised that she would ask the Revenues, Benefits & Customer Services Manager for an update on the latest position which would be circulated to Members.

Agreed: The progress in performance for quarter 4 be noted.

Councillor C Edginton-White left the meeting at this point, (6.07pm).

OS.06

Wyre Forest District Local Plan: Revised Local Development Scheme (Project Plan 2019-21)

The Committee considered a report from the Spatial Planning Manager which set out a revised Local Development Scheme (Project Plan 2019-2021). The Local Development Scheme (LDS) was last reviewed in June 2018, and since then a number of changes had been made.

The Head of Strategic Growth presented the report. She explained that consultation on the Local Plan Pre-Submission document and supporting evidence base studies had taken place in November / December 2018. Following receipt of the responses to the consultation it had become apparent that further clarification was needed on some of the technical evidence base documents for the emerging Local Plan. She said this meant that the Local Plan Pre-Submission public consultation would need to be re-opened to allow further comments to be made on the updated supporting evidence base documents.

The Head of Strategic Growth drew Members attention to the revised project plan and advised that the public consultation would take place in September / October 2019, with a view to seeking approval from full Council in February 2020 for submission to the Planning Inspectorate for independent examination.

A discussion ensued and in response to a Member question the Spatial Planning Manager confirmed that a full report on the consultation version of the plan would come forward to the Overview and Scrutiny Committee meeting in July 2019.

Members acknowledged the importance of the Council being able to demonstrate a 5 year land supply of housing sites, and having an up to date Local Plan to resist hostile planning applications within the District. There was unanimous support by Committee Members for the recommendation to Cabinet.

Agreed: Recommend to Cabinet that:

The proposed revised Local Development Scheme Project Plan 2019 – 2021 as set out in Appendix 1 of the report is approved.

Councillor C Edginton-White re-entered the meeting at 6.24pm.

OS.07

Tracking Recommendations 2018/2019

Agreed: The content of the Tracking Recommendations from 2018/2019 be

noted.

OS.08 Feedback from Cabinet

Agreed: The content of the Cabinet action list, following consideration of the recommendations from its meeting on 26th March 2019 and the meeting of the Cabinet Sub-Committee held on 1st May 2019, be noted.

OS.09 Work Programme

The Committee reviewed the work programme for the current municipal year. The Chairman reminded Members that it was within their remit to request items to come forward for in-depth scrutiny by the Committee.

Agreed: The work programme be noted.

OS.10 Press Involvement

There were no future items for scrutiny that might require publicity.

There being no further business, the meeting ended at 6.27pm.



Overview & Scrutiny Committee

Briefing Paper

Report of: Helen Smith
Date: 4th July 2019
Open

Wyre Forest District Local Plan: Pre-Submission Publication

1. Summary

- 1.1 The purpose of this report is to:
- 1.2 Set out the documentation for re-opening the Local Plan Pre-Submission Publication consultation, referred to as the Regulation 19 consultation. This is the final stage of consultation before submission of the Local Plan to the Secretary of State. The Regulation 19 Local Plan is brought to the Overview and Scrutiny Committee today for consideration. The Pre-Submission Publication document is shown in Background Paper 16.1, and the proposed changes to the draft Local Plan are shown in Appendix 1 and 2 of this report.
- 1.3 To present to Members the draft Consultation Plan for the re-opened Pre-Submission Publication consultation to be held from 2nd September 2019 until 5pm on 14th October 2019. The draft Consultation Plan is set out in Appendix 3 of this report.
- 1.4 To report the technical evidence base studies undertaken in spring 2019 for the Local Plan Review. The technical evidence base studies are in Appendix 4.

2. Background

- 2.1 The review of the Local Plan began in late 2015 with the Issues and Options consultation. Since the close of that consultation, officers worked with the Local Plans Review Panel (LPRP) to bring forward the next stage of the review which was the Preferred Options consultation (Regulation 18).
- 2.2 The Preferred Options consultation (Reg 18) outlined a combination of Core sites and options A and B which gave two potential options for growth and commenced on 15th June 2017 and ended on 14th August 2017. It was carried out in compliance with the Council's adopted Statement of Community Involvement (2013). The consultation included contacting individuals and organisations on the Local Plan database, public drop-in sessions, and information provided via the Council's website and social media. At the end of the consultation process the Council had received over 5,000 responses from members of the public, developers, organisations and statutory consultees.

- 2.3 A summary of the key issues from the Preferred Options consultation was made available to LPRP at the LPRP meeting on 15th January 2018. Feedback from the consultation on the preferred options sites was also provided to LPRP at the meetings held on 19th February 2018 and 19th March 2018.
- 2.4 Following the Preferred Options consultation, work commenced on the Pre-Submission Publication version of the Local Plan. Further technical evidence base work was undertaken in relation to the proposed site allocations and the findings of this with officer recommendations were presented to LPRP on 24th September 2018 and 15th October 2018. LPRP thus reviewed the proposed site allocations and made their recommendations to officers.
- 2.5 On 15th October 2018 LPRP considered the proposed Local Plan Pre-Submission Publication document (Background Paper 16.1) in its entirety. This enabled the LPRP to consider the draft policies, including the development strategy proposed for the district. This October 2018 version of the Pre-Submission Document and supporting evidence base studies were then approved by Cabinet on 30th October 2018 and consulted on during November/December 2018.
- 2.6 However, following receipt of consultation responses to that consultation, it was agreed with Worcestershire County Council that the transport evidence would benefit from further clarification, and it has been necessary to update some of the technical evidence base documents.
- 2.7 The finalisation of sites to be included in the Pre-Submission document can only be completed when the technical evidence base studies are completed and are consistent with other evidence base documents due to their interdependency. The key studies that have been updated/produced are as follows:-
- Transport Evidence Base Paper (June 2019)
 - A450 Corridor Enhancement Report (June 2019)
 - SLC Rail Technical Note on Blakedown Station Car Park Needs (June 2019)
 - Infrastructure Delivery Plan (June 2019)
 - Viability Assessment Note (June 2019)
 - WFDC Golf Facility Review (June 2019)
 - Burlish Golf Course Vision document (June 2019)
- 2.8 The Council's Five Year Housing Land Supply Report has also been updated to provide the most up-to-date information on the Council's five year housing supply as of 1st April 2019. It also incorporates the Government's introduction of the Housing Delivery Test and how this affects Wyre Forest District.
- 2.9 These updates to the various evidence base studies have led to sections of the Local Plan Pre-Submission Document needing to be updated. As a result, the Local Plan Pre-Submission Document (October 2018) has required updates to the following sections:-

- Foreword
 - Chapter 1 – Introduction and Context
 - Chapter 6 – A Sustainable Future: Development Strategy
 - Policy 8G – Site Provision for Travelling Showpeople
 - Chapter 10 – A Good Place to do Business – amendment to Table 10.0.1
 - Chapter 13 – Transport and Accessibility
 - Part C of Local Plan – Proposed Allocations to include:
 - Site allocation at Blakedown and amendment to the settlement boundary for Blakedown village.
 - Removal of Yew Tree Walk site AKR/18.
 - Site allocation LI/10 – a change to employment use.
 - Site allocation LI/12 – a change to Travelling Showpeople use.
 - Site allocation LI/13 – new employment site.
 - Minster Road Outdoor Sports Area.
 - South Kidderminster Enterprise Park.
 - Local Plan Policies Map updates.
- 2.10 The amendments to the Local Plan and the updated technical evidence base documents were presented to LPRP for their consideration and recommendations on 1st July 2019. The amendments to the Local Plan and the updated technical evidence base documents can be viewed in the Appendix section (15) of this report.

3. Purpose of the Local Plan Pre-Submission Publication Consultation

- 3.1 The Pre-Submission Publication Consultation represents the third stage in the review of the District's Local Plan. The first stage was the Issues and Options Consultation in late 2015. This was followed by the second stage in Summer 2017 for the Preferred Options consultation.
- 3.2 The aim of the Pre-Submission consultation is to seek views on whether the emerging Local Plan is legally compliant and if it is considered to be 'sound'. All responses received by the Council will be submitted to the Government appointed Planning Inspector.
- 3.3 A consultation on the Local Plan Pre-Submission Document was held in November/December 2018. The Council has decided to re-open the pre-submission consultation to allow further representations to be made on the Local Plan following updates to some of the evidence base studies. Consultation responses received for the November/December 2018 pre-submission consultation will still be submitted to the Planning Inspectorate at submission stage (unless withdrawn or superseded by consultees with responses to the consultation that will be held in September/October 2019).

4. Pre-Submission Publication Consultation Document

- 4.1 The Pre-Submission Publication document takes account of:
- The extensive evidence base that has been built up since 2015;

- The Issues and Options consultation reported in November 2015 to Cabinet;
 - The Preferred Options consultation reported to Overview and Scrutiny and Cabinet in October 2018;
 - Duty to Cooperate conversations with neighbouring local authorities, the County Council, relevant Statutory Organisations and key infrastructure providers;
 - Advice received from the Local Plans Review Panel.
- 4.2 Given the changes to the updated technical evidence base documents and the National Planning Policy context, attention is particularly drawn to the following key issues:
- Housing need and land supply
 - Transport Modelling and transport evidence
 - Infrastructure Delivery Plan
 - Viability Assessment update
 - Changes made to the consultation version of the Local Plan
- 4.3 **Housing need and land supply**
- 4.4 The Pre-Submission Publication seeks to allocate a sufficient number of sites to accommodate the housing need identified in the Wyre Forest Housing Need Study (HNS) 2018. The HNS (2018) report considered the future housing need for Wyre Forest District based on the standard methodology developed by the Ministry of Housing, Communities and Local Government (MHCLG). Based on the standard methodology and 2017 affordability ratios, the minimum local housing need for Wyre Forest was calculated as 276 dwellings per year using the 2016-based MHCLG household projections.
- 4.5 During 2018/19 the Government consulted on proposed changes to national planning policy and its associated guidance including the standardised methodology for assessing local housing need. As a result of this consultation, the NPPF and its associated Planning Policy Guidance (PPG) (in relation to Housing and Economic Needs Assessment) were both updated in February 2019. These changes have implications for the district's housing requirement.
- 4.6 When the standard methodology for calculating housing need was first brought in during September 2018, the 2016-based household projections were used in the calculation. Across the country as a whole, this meant that the Government would not achieve its goal of building 300,000 dwellings a year by the mid 2020s with delivery estimates as low as 212,000 dwellings per annum expected using this methodology. In Wyre Forest, the 2016-based household projections gave a housing need figure of 276 dwellings per annum. This is the figure used in the Pre-Submission Local Plan of October 2018.
- 4.7 The updated NPPF and PPG now requires housing needs assessments to use the 2014-based household projections to set the baseline for the standard

method calculation. In most cases this would give rise to a higher requirement figure but this recalculation would give a revised figure for Wyre Forest of 248 dwellings per annum.

- 4.8 Using the 2014-based household projections instead of the 2016 ones would generate a national requirement for around 266,000 dwellings which is still far short of the 300,000 the Government aspire to. It should also be remembered that the standard methodology establishes a **minimum** need and not an **actual** housing need.
- 4.9 The PPG Housing and Economic Needs Assessment as updated in February 2019 is clear that the standard methodology provides a minimum annual local housing need figure and that a Local Plan will be considered sound if it plans to meet housing need according to the standard method. However, any method reliant on the 2016-based household projections will not be considered sound (presumably on the basis that it was assumed that the new calculation would give rise to a higher figure). The Wyre Forest Local Plan is using the 2016-based data, so this departure from using the standardised methodology will need to be fully justified. In WFDC's situation, our housing need is actually higher using the 2016 data than the 2014 data so this helps to meet the Government's aspirations of delivering more housing.
- 4.10 As noted, the revised NPPF sets out that the housing requirement calculated using the standard methodology should be used as the starting point for looking at housing need and is not equal to the actual need. The justification for using the higher housing number in the Local Plan is as follows:
- Evidence from the Housing Needs Study (2018) suggests that there is a significant need for affordable housing within the District with 158 dwellings needed each year of the Plan period. It is however, not realistic to expect this amount of affordable housing to be delivered. Since April 2010, 777 affordable dwellings have been delivered – an average of 86 a year. The majority of these have been provided by Wyre Forest Community Housing on 100% affordable sites. A target of 90 affordable homes per year has been set for the Local Plan. This is seen as realistic. Viability issues have reduced the amount of affordable housing being brought forward on large brownfield sites such as British Sugar (12%) and Georgian Carpets (24%). According to the Housing Needs Study, 22% of households cannot afford even social rent levels and therefore it is paramount that a higher housing figure is used in the plan to encourage social rent housing on private developments via S106 agreements.
 - Another argument for using a higher housing figure is to encourage economic growth in the District. The North Worcestershire Economic Development and Regeneration team have been successful in bringing new firms into the district to replace jobs lost with the decline of the carpet industry. In order to attract high quality well-paid jobs into the District, we not only need to provide land for employment development but a wide range of housing on attractive sites at a range of locations. This will encourage people to relocate to the District, not just to live but also to work.

- The Council is now proposing an allocation of approximately 6,365 dwellings over a 20 year period (2016-36). The clear and firm legal advice is that the Council allocates around 15% more than required, to allow for sites not coming forward. Using the 276 figure, the Local Plan would be over allocating by 15%.
- A final reason for using a higher housing figure is to help with the overall national housing supply situation. An annual delivery of 276 dwellings is considered feasible. Proposals for a number of large brownfield allocations are now well-advanced and these are expected to have developers on site prior to the Local Plan examination where potential Green Belt releases will be debated.

4.11 Transport modelling and transport evidence updates

- 4.12 The Transport Evidence Paper (June 2019) details the transport modelling work undertaken by the County Council and their consultant, Jacobs, to assess the growth and identify the transport interventions necessary to support the Local Plan.
- 4.13 The results of the modelling work at AM and PM peak travel times has identified impacts on the road network around Kidderminster and the Kidderminster ring road is expected to experience worsening congestion. The A449, A450 and Stourport town centre are also expected to experience worsening congestion. The highway network will experience average speeds reduced to 23 to 24kph during peak periods and journey times along the key routes are all expected to worsen as a result of the proposed growth.
- 4.14 The results of the transport modelling work have been used to identify the measures contained within the transport section of the Wyre Forest Infrastructure Delivery Plan (IDP). In order to mitigate the impact a combination of measures across all modes is required. Investment in alternative modes of travel to provide real travel choice will help to reduce congestion and delays across the transport network. The County Council has produced a separate report on the proposed A450 corridor enhancements (see Appendix 4).
- 4.15 SLC Rail report about Blakedown Station Car Park needs**
- 4.16 A separate report on Blakedown Railway Station has been provided by Worcestershire County Council as part of the suite of documents forming the transport evidence for the Local Plan. This separate report sets out the justification as to why an additional car park is required at Blakedown railway station, which would be in addition to the site already allocated within the emerging Local Plan at Station Yard for 80 car parking spaces. The additional car park would be located on the site off Station Road and would provide an additional 170 car parking spaces plus 50 residential units. The justification for this additional car parking site includes the following reasons:

- The current station only offers car parking for 10 spaces. As a result of this, there are many vehicles parked on the local streets next to the railway. The additional car park would help to relieve the pressure for parking on the local roads.
- Worcestershire County Council's Rail Investment Strategy (WRIS-2017) identifies increased railway station car parking capacity as a key facilitator in providing access to transformed, sustainable rail connectivity between the County and other UK economies.
- The WRIS has assumed that the ratio of car parking spaces to passenger numbers should remain, at minimum, 1 to 9 given the rural nature of the county, requiring in turn a minimum growth of more than 1,577 new spaces across Worcestershire.
- The significant growth proposed at Lea Castle and East of Kidderminster within the Wyre Forest Local Plan Review provide further justification for an increased demand and therefore parking capacity at Blakedown railway station.

4.17 It is important to note that this site is a Green Belt site, and would therefore involve the loss of green belt land. The draft policy for Blakedown railway station car park is included in the changes made to the draft Local Plan (see para 4.31 of this report).

4.18 The response the Council received from Worcestershire County Council to the Pre-Submission Local Plan consultation held last year in November/December 2018 stated the following about the site at Blakedown railway station:

“WCC is content with the transport policies in the plan, which prioritise sustainable transport and include some critical schemes for the district. However, the sustainable approach to rail is undermined by failure to allocate land for the further phase 2 expansion of Blakedown station and associated car parking provision. Although this may appear to be a minor matter, the consequence of this is to undermine the sustainable transport strategy WCC have sought to achieve through the Local Transport Plan 4 and the Rail Investment Strategy, and its impact may be wider than WFDC itself.

Rail travel offers an alternative to road-based travel, particularly for local commuting into and out of the West Midlands conurbation, not only for existing and new residents, but more widely, and is an opportunity to deliver modal shift from car to rail transport which is more sustainable and will assist in reducing congestion. Delivering the phase 1 and 2 expansion of Blakedown station is critical, because to secure future funding from Government – directly or indirectly – for road improvement schemes, WCC must be able to demonstrate that all reasonable alternatives have been explored and the opportunities for sustainable travel prioritised and delivered. Failure to allocate land for the phase 2 of Blakedown station totally undermines this case.

A suitable area of land was submitted to the plan through the call for sites, but unfortunately has not been included in the draft plan, despite it being (with regard to transport) a sustainable location. This requirement was outlined in

WCC's adopted Local Transport Plan 4, and has been discussed with Wyre Forest District Council Officers at a number of meetings concerning the Local Plan.

Through the Duty to Co-operate we would like to work together to address this omission, and to develop a solution which enables us to deliver the required expansions and sustainable transport aspirations of the Wyre Forest Local Plan and the Local Transport Plan."

- 4.19 It should be noted that the SLC report was provided only recently and was not available to inform the pre-submission plan that was the subject of consultation in 2018. If the current SLC report had been available before last autumn, the Council would have been able to take account of it in the pre-submission plan in 2018.

4.20 Infrastructure Delivery Plan (IDP)

- 4.21 The purpose of the Wyre Forest Infrastructure Delivery Plan (IDP) is to set out the infrastructure requirements as part of the evidence base to support the proposals contained in the Wyre Forest Local Plan Review, which covers the period 2016 to 2036. The revised IDP will replace the Council's draft IDP published with the Pre-Submission consultation in November 2018.

- 4.22 Infrastructure can be defined in simple terms as the facilities that help local people to live their everyday lives. It includes physical "hard" infrastructure (e.g. roads), physical social infrastructure (e.g. school buildings, new or expanded health centres) and green infrastructure (e.g. woodland).

- 4.23 The IDP carries 'living document' status and is subject to on-going change. It is a technical evidence document designed to inform policy rather than be policy itself. The NPPF requires an IDP to be produced alongside a Local Plan at plan making stage. Key statements in the NPPF are made at paragraphs 16b, 20 and 57.

- 4.24 The total infrastructure cost for the Local Plan has been identified as £124 million. This is made up of the following infrastructure requirements:-

- Transport = £63.8m
- Education = £45.8m (total cost of primary and secondary education infrastructure)
- Sport & Recreation = £5.05m
- GPs = £4.1m
- Acute Health = £4m
- Police = £749k
- Waterway = £430k

- 4.25 The IDP has identified secured funding for £19.1m and a possible £27.6m from S106 contributions. Therefore, the IDP has identified a funding gap of £77.3 million. Note that nearly all infrastructure delivery plans produced will have an infrastructure funding gap and this IDP is no different. The funding

scenario is always in a state of change and any funding gap will be a snapshot in time. Nevertheless, this version of the IDP can provide a sound estimate of the funding gap as it is currently known. It is important to note the funding gap doesn't mean infrastructure projects will not be delivered. This is because the funding gap is expected to reduce over the lifetime of the plan as contributions are collected and appropriate funding bids are successful. The emerging Local Plan, supported by its IDP, will play an important role in supporting a successful bidding process. Future work with developers, infrastructure providers including WCC and LEPs will be vital to ensure deliverability.

4.26 Viability Assessment update

4.27 A Pre-Submission Viability Note has been completed to provide an update of the Wyre Forest District Local Plan viability position prior to submission. This is the third time viability has been reviewed in this plan making process following:

- Local Plan Viability Assessment (May 2017);
- Local Plan Viability Assessment Update (October 2018).

4.28 The headline issues the report has identified include:

- This updated report considers changes in National Planning Policy Framework and Planning Practice Guidance alongside an update to the proposed infrastructure costs on the strategic sites in the plan.
- Since the last assessment infrastructure costs and requests for revenue support for services have increased from an average of £12,994 to £17,494 per dwelling.
- This is due to an increase in transport and education costs with new requests being made by NHS Acute Trust and WFDC Waste Collection.
- Currently only approximately £2,500 per dwelling can be afforded for infrastructure funding.
- The affordable housing percentage was tested at 30% ranging down to 0%.
- With the previous viability position of affordable housing at 25% and full infrastructure costs and revenue costs the viability has worsened.

4.29 It should be noted that despite attempts to obtain evidence to support requests made, there are significant gaps in information to enable the requests to be fully considered in some instances.

4.30 Following consultation on the draft IDP earlier this year, Highways England and the NHS Acute Trust have indicated requirements for additional S106 contributions. In relation to Highways England this was to help fund the improvements at Junction 4 of the M5 motorway. However, as Highways England were not able to provide detailed evidence as to the impact of Wyre Forest traffic on this, the Council requested further information and unfortunately this has not been forthcoming. In relation to the NHS Acute Trust, the request was for revenue funding in relation to a additional demand

generated from the new housing developments in the absence of government funding in year one. Again, further evidence was requested in relation to this request but this has also not been forthcoming. As the IDP is a live document that can still be updated, both these bodies will have an opportunity to respond again in the re-opened consultation; so these potential additional requirements have been removed from the Infrastructure Delivery Plan under consideration at this time.

4.31 Changes made to the consultation version of the Local Plan

4.32 Updates to the Local Plan evidence base work have required some changes being made to the Local Plan. These changes include amendments to the following sections of the Local Plan:

- Foreword
- Chapter 1 – Introduction and Context
- Chapter 6 – A Sustainable Future: Development Strategy
- Policy 8G – Site Provision for Travelling Showpeople
- Chapter 10 – A Good Place to do Business – amendment to Table 10.0.1
- Chapter 13 – Transport and Accessibility
- Part C of Local Plan – Proposed Allocations to include:
 - Site allocation at Blakedown and amendment to the settlement boundary for Blakedown village.
 - Removal of Yew Tree Walk site AKR/18.
 - Site allocation LI/10 – a change to employment use.
 - Site allocation LI/12 – a change to Travelling Showpeople use.
 - Site allocation LI/13 – new employment site.
 - Minster Road Outdoor Sports Area.
 - South Kidderminster Enterprise Park.
- Local Plan Policies Map updates.

4.33 These changes to the Local Plan Pre-Submission document are presented in a separate document shown in Appendix 1 and 2 of this report. These changes will be presented in the clearest possible way for the purposes of the consultation which is due to commence on 2nd September 2019.

4.34 Changes in particular include amendments to Chapter 6 of the Local Plan following updates to the Council's Five Year Housing Land Supply position and the Government's introduction of the Housing Delivery Test and changes to the Standardised Methodology for calculating housing need.

4.35 Amendments to the Local Plan include an additional site allocation at Blakedown for car parking for the railway station and residential use. This has already been discussed in this report at paragraph 4.15 onwards. Additional car parking is needed at Blakedown railway station to meet the demand for car parking spaces for rail users on the commuter line to the Black Country and Birmingham as evidenced in the SLC Rail document. In addition to the car parking, housing development on the site would enable the car parking development and would also help towards meeting the future housing needs in Blakedown.

- 4.36 The site allocation 'Yew Tree Walk, AKR/18' has been removed from the Local Plan as a number of issues came to light since the site was proposed. It has been concluded that the site does not meet the criteria for being on the Brownfield Land Register and should therefore be removed from the Local Plan. This is because there is no evidence that the site was used for the extraction of sand and gravel and there is no evidence to show that it has been previously developed as defined by the NPPF. There is also concern over the stability of the land and the practicality of actually building on the site, which would have implications for the deliverability of this site.
- 4.37 There has been an amendment to the location of the Travelling Showpeople site (now site LI/12) and the addition of a new employment site (LI/13). In the Pre-Submission Local Plan consulted on in November 2018, the site LI/10 was allocated as the site for Travelling Showpeople. Since the consultation, further discussions have been had with the Travelling Showpeople family and they have shown preference for site LI/12 (which currently houses the former Burlish golf club house, shop and storage shed). This site (LI/12) was a proposed allocation in the Local Plan for employment use. These two sites have therefore been switched around to help meet the needs of the Travelling Showpeople family. A new employment site (LI/13) has been added into the Local Plan to help unlock employment use within this area and aid the access route to site allocations LI/10 and LI/12. However, it is important to note that this land is located within the Green Belt and would therefore result in the loss of 1.96ha of green belt land.
- 4.38 The changes to the Local Plan also include an amendment to the allocation for Minster Road Outdoor Sports Area. This is following further evidence base work on the former Burlish Golf Course site (which can be viewed in Appendix 4).

5. Sustainability Appraisal

- 5.1 When producing Local Plans, local authorities are required to consider, at each stage of production, the impacts their proposals are likely to have on sustainable development. The emerging Local Plan is subject to ongoing Sustainability Appraisal incorporating the requirements of Strategic Environmental Assessment (SA/SEA) as required through NPPF. SA/SEA is a means of ensuring that the likely social, economic and environmental effects of the Local Plan are identified, described and appraised to identify how they support the Council's sustainable development objectives.
- 5.2 At the Pre-Submission Publication stage of the Local Plan a SA/SEA has been undertaken. The Sustainability Appraisal (2018 & 2019 update) is a detailed technical document and is an important background paper to the emerging Local Plan. It has been used to inform the Local Plan and will be made available as a part of the Local Plan Pre-Submission Publication (Reg 19) consultation.

6. Consultation Arrangements

- 6.1 Cabinet will meet on 16th July 2019 to formally agree to the Pre-Submission version of the Local Plan for consultation and to the re-opening of the Local Plan Pre-Submission Publication consultation. The consultation will run from Monday 2nd September until 5pm on Monday 14th October 2019.
- 6.2 A draft Consultation Plan is attached at Appendix 3. It includes specific details on the proposed dates, timescale and consultation methods that Officers intend to use. The Pre-Submission Publication Consultation will open formally on 2nd September 2019 for a 6 week period; the reopening of the consultation will allow the public the maximum opportunity to respond to the updated pre-submission version of the local plan and the updated evidence base.
- 6.3 Consultees will be able to respond to the Pre-Submission documentation either online, via email or via post, with encouragement to use digital means for ease of administrative handling. Consultation response forms must be used and no late responses will be accepted.
- 6.4 There will be three drop-in sessions during the consultation period as listed below for the public to address their questions to staff.

Date	Time	Venue
Wednesday 11 th September 2019	3pm to 6pm	Blakedown Parish Rooms 18 Belbroughton Road Blakedown DY10 3JG
Wednesday 18 th September 2019	3pm to 7pm	Corn Exchange Kidderminster Town Hall DY10 1BD
Saturday 28 th September 2019	10am to 1pm	Stourport Civic Hall DY13 8UJ

7. Options

- 7.1 That Overview and Scrutiny Committee note the progress in the preparation of:
- a) The Pre-Submission Publication Consultation (Regulation 19) documentation (as shown in background paper 16.1, and amendments in appendix 1 and 2); and
 - b) The updated technical evidence base papers (as shown in appendix 4).
 - c) The draft Consultation Plan for the Pre-Submission Publication consultation (as shown in appendix 3).

And either

- 7.2 Overview and Scrutiny Committee recommend the Pre-Submission Publication consultation documentation, the updated technical evidence base studies, and the draft Consultation Plan to Cabinet for their approval:

Or

- 7.3 Overview and Scrutiny Committee recommend the Pre-Submission Publication consultation documentation, the updated technical evidence base studies, and the draft Consultation Plan to Cabinet subject to any appropriate recommendations for amendment that Overview and Scrutiny Committee might wish to propose:

Or

- 7.4 To make any other recommendation to Cabinet that the Committee wish to be considered.

8. Consultation

- 8.1 The proposed public consultation would start on Monday 2nd September 2019 and finish at 5pm on Monday 14th October 2019. No late responses will be accepted.

9. Related Decisions

- 9.1 Previous stages of development and consultation on the local plan, as set out in the report above.

10. Relevant Council Policies/Strategies

- 10.1 Wyre Forest District Local Plan Pre-Submission Publication Document (2018).
10.2 Wyre Forest District Local Plan Review Preferred Options Document (2017).
10.3 Wyre Forest District Local Plan Review Issues and Options Document (2015).

11. Implications

11.1 Financial Implications

The cost of preparing the Local Plan Review has been met by the Planning Policy budget. The District Council will be required to meet the costs of the examination of the Local Plan and this will be met from the existing Planning Policy budgets.

11.2 Legal and policy implications

- 11.3 The procedures which the Council is required to follow when producing a Local Plan derive from the Planning and Compulsory Purchase Act 2004 (as

amended) and the Town and Country Planning (Local Development) (England) Regulations 2012.

- 11.4 The legislation states that a local planning authority must only submit a plan for examination which it considers to be sound. This is defined by the National Planning Policy Framework (NPPF, 2019) as being:
- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.
- 11.5 In order for the draft Local Plan to pass the tests of soundness, it is necessary for it to be based on an adequate, up to date and relevant evidence base. The Council also has a legal duty to comply with the Statement of Community Involvement in preparing the Plan and also has a legal ‘Duty to Co-operate’.
- 11.6 Should the Local Plan be successful at examination stage, the District Council will be required to formally adopt the plan and it will become part of the Development Plan for the purposes of determining planning applications.

12. Risk Management

- 12.1 The re-opening of the consultation has allowed the Council to take account of updated evidence base information and responses from statutory consultees to the 2018 consultation, in accordance with the “duty to cooperate”. The changes now proposed reduce the risk of sustainable objections to the plan in front of the inspector.
- 12.2 The main risks in failing to progress a Local Plan for the Wyre Forest District in compliance with laws, regulations and guidance are as follows:
- The plan is found ‘unsound’ at examination leading to ‘withdrawal’ of further work;
 - Direct interventions by Government into the District Council’s Local Plan making;
 - Inability to steer, promote or restrict development across its administrative area;

- Potential damage to the Council's image and reputation if a development plan is not adopted in an appropriate timeframe.

13. Equality Impact Needs Assessment

- 13.1 No negative impacts have been identified. A number of the policies included within the Pre-Submission Plan help to promote equality and eliminate discrimination.

14. Wards affected

- 14.1 All wards within the district are affected.

15. Appendices

- 15.1 Appendix 1 – Amendments to Local Plan Pre-Submission document (July 2019)
- 15.2 Appendix 2 – Local Plan Pre-Submission Publication – Policies Maps (July 2019)
- 15.3 Appendix 3 – Draft Consultation Plan.
- 15.4 Appendix 4 – Updated/additional technical evidence base documents:
- Transport Evidence Paper (June 2019) (*Draft version*)
 - A450 Corridor Enhancement Report (June 2019) (*Draft version*)
 - SLC Rail Technical Note on Blakedown Station Car Park Needs (June 2019) (*Draft version*)
 - WFDC Infrastructure Delivery Plan (IDP) (June 2019) (*Draft version*)
 - Viability Assessment Note (June 2019)
 - WFDC Golf Facility Review (June 2019)
 - Burlish Golf Course Vision document (June 2019)

16. Background Papers

- 16.1 Local Plan Review Pre-Submission Publication document (October 2018):
<https://www.wyreforestdc.gov.uk/media/3993526/Pre-Submission-Publication-October-2018-.pdf>
- 16.2 Local Plan Review Preferred Options document (June 2017):
<http://www.wyreforestdc.gov.uk/media/3024240/Preferred-Options-Document-June-2017.pdf>
- 16.3 Local Plan Review Issues and Options document (September 2015):
<http://www.wyreforestdc.gov.uk/media/1462993/I-O-Consultation-Version-September-2015-WEB.pdf>

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Wyre Forest District Local Plan 2016-2036

Amendments to the Pre-Submission Publication Document

July 2019



Wyre Forest
District Council

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1. Introduction

- 1.1 This document sets out the amendments to the Wyre Forest District Local Plan Pre-Submission Document. These amendments were agreed by Cabinet at a meeting held on 16th July 2019. The Cabinet report can be viewed here: [Link to be inserted when known]
- 1.2 The Wyre Forest District Local Plan Pre-Submission document (October 2018) and supporting evidence base studies were consulted on in November/December 2018. However, following receipt of responses to the consultation it was agreed with Worcestershire County Council that the transport evidence would benefit from further clarification and it has been necessary to update some of the technical evidence base documents for the emerging Local Plan since the public consultation including the transport modelling, a transport evidence base paper, the viability assessment and the Infrastructure Delivery Plan due to their interdependency.
- 1.3 The key studies that have been updated/produced are as follows:-
- Transport Evidence Base Paper (June 2019)
 - A450 Corridor Enhancement Report (June 2019)
 - SLC Rail Technical Note on Blakedown Station Car Park Needs (June 2019)
 - Infrastructure Delivery Plan (June 2019)
 - Viability Assessment Note (June 2019)
 - WFDC Golf Facility Review (June 2019)
 - Burlish Golf Course Vision document (June 2019)
- 1.4 The Council's Five Year Housing Land Supply Report has also been updated to provide the most up-to-date information on the Council's five year housing land supply as of 1st April 2019. It also incorporates the Government's introduction of the Housing Delivery Test and how this affects Wyre Forest District.
- 1.5 These updates to the various evidence base studies have led to sections of the Local Plan Pre-Submission Document needing to be updated. As a result, the Local Plan Pre-Submission Document (October 2018) has required updates to the following sections:-
- Foreword
 - Chapter 1 – Introduction and Context
 - Chapter 6 – A Sustainable Future: Development Strategy
 - Policy 8G – Site Provision for Travelling Showpeople
 - Chapter 10 – A Good Place to do Business – amendment to Table 10.0.1
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 - Part C of Local Plan – Proposed Allocations to include:
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 - Removal of Yew Tree Walk site AKR/18.
 - Site allocation LI/10 – a change to employment use.
 - Site allocation LI/12 – a change to Travelling Showpeople use.
 - Site allocation LI/13 – new employment site.
 - Minster Road Outdoor Sports Area.
 - South Kidderminster Enterprise Park
 - Local Plan Policies Map updates.

1.6 The amendments to the Local Plan and the updated technical evidence base documents were presented to Cabinet during the meeting on 16th July. The technical evidence base documents can be viewed on the Council's website at: www.wyreforestdc.gov.uk/localplanreview

2. Amendments made to the Wyre Forest District Local Plan Pre-Submission Document

- 2.1 Updates to the Local Plan evidence base work have required some changes being made to the Local Plan. These changes include amendments to the following sections of the Local Plan:
- Foreword
 - Chapter 1 – Introduction and Context
 - Chapter 6 – A Sustainable Future: Development Strategy
 - Policy 8G – Site Provision for Travelling Showpeople
 - Chapter 10 – A Good Place to do Business – amendment to Table 10.0.1
 - Chapter 13 – Transport and Accessibility
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 - Removal of Yew Tree Walk site AKR/18.
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 - Site allocation LI/12 – a change to Travelling Showpeople use.
 - Site allocation LI/13 – new employment site.
 - Minster Road Outdoor Sports Area.
 - South Kidderminster Enterprise Park.
 - Local Plan Policies Map updates.
- 2.2 These changes to the Local Plan Pre-Submission document will be consulted on during the re-opening of the Pre-Submission consultation which starts on 2nd September 2019 and closes at 5pm on 14th October 2019.
- 2.3 Changes in particular include amendments to Chapter 6 of the Local Plan following updates to the Council's Five Year Housing Land Supply position and the Government's introduction of the Housing Delivery Test and changes to the Standardised Methodology for calculating housing need.
- 2.4 Amendments to the Local Plan include an additional site allocation at Blakedown railway station for car parking and residential use. Additional car parking is needed at Blakedown railway station to meet the demand for car parking spaces for rail users on the commuter line to the Black Country and Birmingham as evidenced in the SLC Rail document (Local Plan evidence base studies can be viewed on the Council's website here: www.wyreforestdc.gov.uk/localplanreview). In addition to the car parking, housing development on the site would enable the car parking development and would also help towards meeting the future housing needs in Blakedown.
- 2.5 The site allocation 'Yew Tree Walk, AKR/18' has been removed from the Local Plan as a number of issues have come to light since the site was proposed. It has been concluded that

the site does not meet the criteria for being on the Brownfield Land Register and should therefore be removed from the Local Plan. This is because there is no evidence that the site was used for the extraction of sand and gravel and there is no evidence to show that it has been previously developed. There is also concern over the stability of the land and the practicality of actually building on the site, which would have implications for the deliverability of this site. The Council also received a petition signed by 193 people to protect this site during the Pre-Submission consultation held in 2018, as well as an objection from Worcestershire Wildlife Trust against the proposed development at this site.

- 2.6 There has been an amendment to the location of the Travelling Showpeople site (now site LI/12) and the addition of a new employment site (LI/13). In the Pre-Submission Local Plan consulted on in November 2018, the site LI/10 was allocated as the site for Travelling Showpeople. Since the consultation, further discussions have been had with the Travelling Showpeople family and they have shown preference for site LI/12 (which currently houses the former Burlish golf club house, shop and storage shed). This site (LI/12) was a proposed allocation in the Local Plan for employment use. These two sites have therefore been switched around to help meet the needs of the Travelling Showpeople family. A new employment site (LI/13) has been added into the Local Plan to help unlock employment use within this area and aid the access route to site allocations LI/10 and LI/12. However, it is important to note that this land is located within the Green Belt and would therefore result in the loss of 1.96ha of green belt land.
- 2.7 The changes to the Local Plan also include an amendment to the allocation for Minster Road Outdoor Sports Area. This is following further evidence base work on the former Burlish Golf Course site (which can be viewed in the Local Plan evidence base documents on the Council's website here: www.wyreforestdc.gov.uk/localplanreview)
- 2.8 The following sections of this document set out the changes that have been made to the Wyre Forest District Local Plan Pre-Submission Document (October 2018). Comments on these amendments should be submitted to the Council as part of the re-opening of the consultation. Details of how to comment can be found in section 4 of this document on page 12.

3. Amendments to Foreword of Local Plan

Pre-Submission Local Plan – Foreword

Amendments to wording are shown in **bold text and underlined**.

Wyre Forest District Local Plan Pre-Submission Publication – Foreword

Welcome to the Wyre Forest District Council consultation on the Pre-Submission Publication as part of the Review of the Local Plan. The Council is **re-opening the Pre-Submission consultation for further comments to be made on the Pre-Submission Local Plan**, which includes proposals to accommodate its housing and employment needs up to 2036. This Local Plan Pre-Submission Publication Consultation is part of the process the Council has to follow to eventually adopt a new Local Plan to replace the current one which was adopted in 2013. The process of reviewing the Local Plan began in 2015 when the Council consulted on the broad Issues and Options, and was followed by the Preferred Options consultation held in 2017. The Council hopes the process will be complete when the Local Plan is adopted in 2020. The Local Plan that is finally adopted will have to respect the guidance provided to Local Authorities by Government's National Planning Policy Framework which requires Councils to plan positively for a period of at least 15 years for development in its area and particularly to meet the objectively assessed need for market and affordable housing.

Wyre Forest District Council believes that to have an up-to-date adopted Local Plan is essential in order to successfully plan for development to go where we want it and to enable the Council to make good decisions on planning applications.

The Council welcomes responses to this **re-opening of the Pre-Submission** consultation which will run from **2nd September 2019** until 5pm on **14th October 2019**. This **Pre-Submission** consultation is different from **the Issues and Options consultation and the Preferred Options** consultation as all comments submitted to us during this consultation will go to the government appointed planning inspector. **(Note that all the consultation responses previously received by the Council during the Pre-Submission consultation held last year in Autumn/Winter 2018 will also be submitted to the planning inspector)**. The planning inspector will only consider two questions about the plan; whether the plan is within the law, and whether it can be considered 'sound'. Any comments received must address these issues.

We will be undertaking consultation drop-in sessions **within** the district throughout **September** and **will be** inviting people to respond **during the consultation period**. We need to work together to successfully adopt a new Local Plan and we need your help to do that. We therefore encourage you to let us have your views on this Local Plan Pre-Submission Publication.

4. Amendments to Chapter 1 – Introduction

Amendments to wording are shown in bold text and underlined.

Pre-Submission Local Plan – Chapter 1: Introduction

Introduction

1.1 This document is Wyre Forest District Council's Local Plan Pre-Submission Publication. In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 it has been published to allow representations to be made before the document is submitted to the Planning Inspectorate. Consultation on the Local Plan Pre-Submission Publication will run from **2nd September 2019** to **14th October 2019**. All representations received **from this consultation and the previous Pre-Submission consultation that was held in Autumn/Winter 2018** will be submitted with the Local Plan to the Secretary of State for examination in public.

1.2 Wyre Forest District Council (WFDC) is the local planning authority responsible for producing the Local Plan; town and parish councils can produce neighbourhood plans, and Worcestershire County Council is responsible for producing the minerals and waste local plans and also the Local Transport Plan. Together these plans make up the Development Plan, which sets out where development can take place, or where it should be avoided, and what form and type of development should take place.

What is the Local Plan Review?

1.3 This document is the latest stage in the preparation of the Wyre Forest Local Plan Review which sets out the long-term vision and strategic context for managing and accommodating growth within the District until 2036. The aim of the Local Plan is to set out:

- the areas where development will take place;
- the areas that will be protected; and
- policies that will be used to determine planning applications.

1.4 Under the planning system most development needs planning permission. The principal basis for making those decisions is the development plan; this emerging Local Plan once adopted will form the main part of it for Wyre Forest **District**, replacing the currently adopted Local Plan.

How has the Local Plan Review been prepared?

1.5 The key stages for preparing the Local Plan have included gathering evidence, identifying key issues and options and public consultation. The Council has consulted extensively on the development of the Local Plan. Key public consultations are listed below:

- Issues and Options consultation - Autumn 2015
- Preferred Options consultation - Summer 2017
- Pre-Submission Publication consultation - **Autumn/Winter** (2018)

- **Re-opening of Pre-Submission Publication consultation – September/October (2019)**

1.6 The Council received more than 1,600 responses to the Issues and Options public consultation, and over 5,000 responses to the Preferred Options public consultation, many of which were very detailed. Summaries of the consultation responses and key issues raised **for the Issues and Options consultation and the Preferred Options consultation** are available on the Council's website. **(Note: Consultation responses to the Pre-Submission Publication will be made available on the Council's website at Submission stage).** In addition, a number of 'Call for Sites' has been undertaken during which landowners were able to submit their sites for consideration. Various meetings have been held throughout the process including meetings with Worcestershire County Council, meetings with Statutory Consultees such as Historic England and Natural England, ongoing discussions with service and infrastructure providers and other local authorities and key bodies. Wherever possible, responses have been taken into account in the preparation of this Local Plan.

National Planning Policy

1.7 The content of the Wyre Forest Local Plan has to be in conformity to the Government's national planning policy as set out in the National Planning Policy Framework (NPPF), and the guidance contained in the National Planning Practice Guidance, the content of new relevant legislation and Government statements about planning. Whilst preparing this Pre-Submission Publication, the Government published its draft revised NPPF in March 2018 with the final version being published on 24th July 2018. **Further updates to the NPPF have since been published by the Government on 19th February 2019.**

Background and Context

1.8 The current adopted Local Plan has served the District well. It has effectively directed development in a sustainable pattern and has brought forward sufficient land to meet the District's needs whilst at the same time protecting the District from speculative greenfield development. It has supported and encouraged the significant enhancement of the District during its lifetime.

1.9 It has however been necessary to undertake a review of the Local Plan, as the Council has a legal obligation to have an up-to-date Local Plan. This process commenced in September 2015 with the "Issues and Options" consultation which explained that it is necessary to review the current plan for a number of key reasons:

- To consider the amount of development that will be required in response to the most recent official data (including population trends, demand for housing, economic trends) and locally generated evidence.
- To respond to recent changes in legislation (including the Housing and Planning Act 2016) and national planning policy as reflected in the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).
- To respond to the Government's demand that Local Planning Authorities should have a Local Plan that is regularly reviewed and evidence-based to enable them to respond strategically to changing development needs over at least a 15 year period.

1.10 It is important to note that the proposed Local Plan as set out by this Pre-Submission Publication document is a complete Plan and would be intended to replace all of the currently adopted Core

Strategy (2010), Site Allocations and Policies Local Plan (2013), and the Kidderminster Central Area Action Plan (2013). As such the coverage of the new Local Plan will be:

- The **strategic element and policies** (Part A) as generally currently set out in the adopted Core Strategy;
- The **development management policies** (Part B) as generally currently set out by the adopted Site Allocations and Policies DPD;
- The **allocations policies** (Part C) as generally currently set out in the adopted "Site Allocations and Policies" and "Kidderminster Central Area Action Plan" DPDs;
- The proposed approach to **monitoring and implementation** (Part D).

1.11 This will assist the reader by placing all aspects of the Local Plan into a single document and will remove the repetition which is unavoidable in the current documentation.

Influences on the development of the Local Plan

1.12 National planning policy includes the National Planning Policy Framework (NPPF). The NPPF sets out a number of fundamental issues that need to be taken into account during the preparation of local plans, which include the following requirements:

- a. To set out a clear economic vision and strategy for the area which positively and proactively encourages sustainable economic growth.
- b. To use a robust and up-to-date evidence base to ensure that the local plan meets the objectively assessed needs for the market and affordable housing in the housing market area, as far as is consistent with the policies set out in the NPPF, including identifying key sites that are critical to the delivery of the housing strategy over the plan period.
- c. To set criteria, or identify strategic sites, that will help to encourage local and inward investment to match the strategy and meet anticipated needs over the plan period.
- d. To maintain a five-year supply of deliverable housing sites with an appropriate buffer.
- e. To recognise a duty to co-operate between public bodies and to implement a new soundness test, to ensure that plans are "positively prepared."

1.13 Wyre Forest District is unusual in that it currently constitutes a self contained Housing Market Area whilst at the same time it is a member of two Local Enterprise Partnerships (LEPs) - namely Greater Birmingham and Solihull LEP and Worcestershire LEP. This provides Wyre Forest with a range of opportunities to further enhance its economic position, access funding streams and ensure that the area is able to continue to look both towards the rest of Worcestershire and the conurbation in the same way that it has done for many years. It also brings a range of challenges in terms of ensuring that development is balanced, is proportionate to the capacity of the District and does not undermine the unique character of the area.

1.14 In 2013 leaders from Worcestershire's business, voluntary, community and public sector organisations pledged to work together to create a better future for Worcestershire. Expressed via "Worcestershire Next Generation" <http://www.wearethenextgeneration.co.uk> this provides an update to the Sustainable Community Strategy.

The Duty to Co-operate

1.15 The Duty to Co-operate was introduced through the Localism Act 2011 and places a requirement on Local Planning Authorities (as well as a number of other public bodies) to work

together on cross-boundary strategic issues. Local Planning Authorities and other public bodies are required to engage constructively, actively and on an on-going basis to develop strategic policies. This requirement is also **established** in national planning policy (NPPF, paragraphs 24 to 27).

1.16 The NPPF introduces a new 'soundness' requirement to be met through the compliance with the Duty to Co-operate. Plans are to be positively prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. Joint working should be diligently undertaken for the mutual benefit of neighbouring authorities and enable Local Planning Authorities to work together to meet development requirements which cannot wholly be met within their own areas. Local Planning Authorities will be expected to demonstrate evidence of having effectively co-operated to plan for issues with cross boundary impacts when their Local Plans are submitted for examination. Co-operation should be a continuous process of engagement.

1.17 As part of its plan making process, Wyre Forest District Council has consulted and engaged with relevant Local Planning Authorities and other public bodies on emerging policies at key stages. The Duty to Co-operate formalises this process and places an emphasis on continuity.

1.18 Wyre Forest District Council is fully committed to continuing to work positively and proactively with other local authorities and public bodies to address strategic issues in the longer term, particularly with regards to addressing opportunities to meet unmet housing needs. Where necessary, Statements of Common Ground will be prepared for the purposes of the examination stage (in accordance with NPPF).

Evidence

1.19 In order to ensure that the Local Plan's policies are robust and supported by evidence, the Council has carried out and commissioned a wide range of studies. Work undertaken includes the following and can be viewed on the Council's Planning Policy webpages:

- Objectively Assessed Housing Needs (now the Housing Needs Study)
- **Housing and Economic Land Availability Assessment**
- **Site Selection Paper**
- Employment Land Review
- Green Belt Study
- Strategic Flood Risk Assessment
- Water Cycle Study
- Heritage Impact Assessment
- Ecological Appraisals
- Open Space, Built Facilities and Playing Pitch Strategies
- A revised settlement hierarchy
- Retail and Commercial Leisure Needs Survey
- Traffic Modelling **and Transport Evidence Paper**
- Infrastructure Delivery Plan
- Viability Assessment

1.20 A Sustainability Appraisal report is also required under European and government legislation, which has to assess the sustainability implications of the proposals and policies in the Local Plan. A Sustainability Appraisal report has therefore been prepared to accompany the Local Plan.

Using this Local Plan Pre-Submission Publication Document

1.21 This Local Plan Pre-Submission Publication has been written with the intention that it should be read as a whole. Taken together, the policies and proposals within the Local Plan Pre-Submission Publication will form a coherent strategy for development in the Wyre Forest Plan area up to 2036 (Local Plan period is 2016 to 2036). It is therefore important that individual policies are not considered in isolation. (Note that the plan period has been extended by 2 years to that which was consulted on at Preferred Options stage. This is so the Local Plan will be in conformity with the NPPF, with a 15 year time period post adoption which is **anticipated** to be in 2020).

1.22 The policies in the Local Plan will only apply where planning permission is required and not where permitted development rights exist as set out in the Town and Country Planning (General Permitted Development) (England) Order 2015.

1.23 This document is accompanied by a Policies Map which shows the area specific policies and proposals on an Ordnance Survey base map. The Policies Map identifies areas to be allocated for development and designations which need to be taken into account in applying policies. The Local Plan Policies Map does not replicate proposals and designations from the 'made' neighbourhood plans and their maps will need to be consulted separately.

How to Comment on the Local Plan Pre-Submission Publication document

1.24 The **six** week consultation on the Local Plan Pre-Submission Publication will start on **Monday 2nd September 2019** and will close promptly at 5:00pm Monday **14th October 2019**. **No late responses will be accepted.**

1.25 The consultation response form follows the same structure as the standard response form issued by the Planning Inspectorate. This is so that consultation responses are set out in the way the Planning Inspector will consider comments at the public examination. The consultation response form **will be made** available to complete on the Council's website:

www.wyreforestdc.gov.uk/localplanreview **We will only accept responses submitted using the consultation response form.**

1.26 The Council strongly encourages responses to be submitted using the on-line response form via the District Council's interactive consultation system. Consultation responses will only be accepted if submitted in one of the following ways:

- Via the On-line portal
- by downloading the form from our website: www.wyreforestdc.gov.uk/localplanreview
- collecting a hard copy from main reception at Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF, or from the Customer Service Centre, Town Hall, Vicar Street, Kidderminster, DY10 1DB.
- forms should be emailed to: LPR@wyreforestdc.gov.uk or posted back to Planning Policy Team, Wyre Forest DC, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF.

1.27 Please note that representations made at this stage in the process cannot remain anonymous, but details will only be used in relation to the Wyre Forest District Local Plan Review. Your response will be made available to view as part of the Examination process.

1.28 The Planning Policy Team will host a number of drop-in sessions during the consultation period where you can come along and speak to us about the Local Plan Pre-Submission Publication and how it might affect you. These sessions will be as follows:

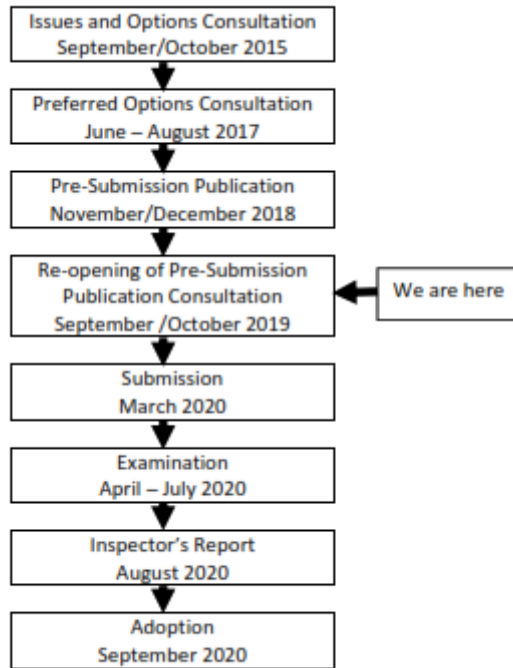
Date	Time	Venue
<u>Date to be confirmed – September 2019</u>	<u>Time to be confirmed</u>	<u>Kidderminster Town (venue to be confirmed).</u>
<u>Date to be confirmed – September 2019</u>	<u>Time to be confirmed</u>	<u>Stourport-on-Severn (venue to be confirmed).</u>
<u>Date to be confirmed – September 2019</u>	<u>Time to be confirmed</u>	<u>Blakedown (venue to be confirmed).</u>

The Next Stages

1.29 After the Local Plan Pre-Submission Publication consultation period ends, we will consider all of the consultation responses received during the **two** consultation periods and may, as a result, update the Submission version of the Local Plan. The Submission version will be approved by a meeting of the full Council which is expected to happen in **February 2020**. We will then submit the Submission version of the Local Plan for examination by an independent Government appointed Planning Inspector. **All** consultation responses received for this Local Plan Pre-Submission Publication document and the updated evidence base studies will be passed to the Planning Inspector. **(Note: This will also include the consultation responses received by the Council during the Pre-Submission consultation held in Autumn/Winter 2018).**

1.30 The Council anticipates that an examination in public will be held on the plan in **Spring 2020** with adoption of the Local Plan taking place in **late** 2020. **However, the timetable after submission is beyond the Council's control and will be in the hands of the Government appointed Planning Inspector.**

Key stages of the Wyre Forest District Local Plan Review



Note: Diagram above has been updated.

5. Amendments to Chapter 6 – A Sustainable Future: Development Strategy

Amendments to wording are shown in **bold text and underlined**.

Chapter 6 - A Sustainable Future - Development Strategy

Introduction

6.1 The Development Strategy sets out the broad framework for future development within the District for the 2016-2036 time period. It takes forward the vision and development objectives into a strategy to address the issues and challenges facing the District and to guide development into the future. Importantly it also establishes a clear role for the District's settlements in accommodating future development.

Summary of Preferred Options Responses

Some of the key issues raised during the Preferred Option consultation included the following:

- A number of respondents disagreed with the OAHN requirement of 300 dwellings per annum and thought the figure should be lower.
- Concerns over Green Belt release for future development. Loss of agricultural land and wildlife.
- The proposed Eastern Relief Road proved to be unpopular with criticism that this relief road would not be sufficient to alleviate the traffic problems in Kidderminster.
- Brownfield land should be built out first before releasing any Green Belt land.
- The Plan period should be extended beyond 2034 to be NPPF compliant, i.e. Local Plans should have a 15 year time horizon from adoption.
- Concerns that infrastructure will be **insufficient** to support new development, i.e. not enough school places, GP surgeries already fully stretched, and congestion on road network.
- Concern that there are insufficient jobs to sustain the number of extra people.
- In terms of the proposed options A and B, there was criticism of both options and a number of respondents considered a combination of the two options would provide both deliverable and sustainable growth for the district.

Summary of Issues and Options Responses

The Issues and Options consultation was broadly supportive of the matters identified. Consultees' particular concerns related to:

- Very poor public transport and high levels of traffic congestion with poor strategic transport infrastructure. It was considered that these issues need to be addressed to encourage further investment in the District.
- The need to meet the District's housing and other requirements and that a pro-growth agenda should be pursued. This needs to look beyond just brownfield redevelopment and should address the relationship between the Green Belt, brownfield land availability, the deliverability of current Plan allocations, housing completions and employment opportunities.

- Other issues included the need to look at Green Infrastructure strategically, the potential to focus new development around strategic transport infrastructure and the progression of a strategic Green Belt Boundary Review.
- General support for the re-utilisation of brownfield land (Option 1) continues though there are concerns about the viability of some of these sites. Similarly support continues for the emphasis of concentrating development in and around the main settlements.
- Support for a sustainable urban extension to the north of Kidderminster based on the Lea Castle Hospital site (Option 2) and the Hurcott Lane ADR: although in respect of the latter concern was expressed in respect of traffic and impact on the SSSI.
- Local opposition from local residents (particularly the Spennells Housing Estate) in respect of an Eastern Kidderminster extension (Option 3) although some support for this approach was expressed from other quarters.
- Continuing widespread support for the brownfield regeneration of Stourport (Option 4) with some querying whether further greenfield development there is necessary.
- Concerns over the recent lack of development in Bewdley were expressed with the acknowledged need for some development to meet local requirements (Option 5). This may need a redrawing of the settlement boundary if the Air Quality Management Area problems are not worsened.
- Little enthusiasm was expressed for allocating development to the Rural East villages (Option 6). Where development takes place this should be proportionate.
- Due to its isolation and poor sustainability little enthusiasm was expressed for directing development to the Rural West (Option 7) though the requirement to meet local need is acknowledged.

6.2 The Development Strategy is made up of six policies which consider:

- the Development Needs – or amount of development - to be delivered within the Plan period (Policy 6A);
- the general location strategy for new development and Settlement Hierarchy (Policy 6B);
- the role of Kidderminster as the strategic centre (Policy 6C);
- the role of the Strategic Allocation Sites (Policy 6D);
- the role of Stourport-on-Severn and Bewdley as market towns (Policy 6E); and
- the role of the villages and other rural settlements (Policy 6F).

6.3 The 'Key Diagram' supports the Development Strategy by showing the opportunities and constraints to guide new development and significant future infrastructure. The Key Diagram is the principal illustration of the spatial strategy. The diagram identifies broad locations for development, key areas of constraint, the main patterns of movement and also outlines the classification of settlements, reflecting the settlement hierarchy included within the Spatial Development Strategy. The Key Diagram can be viewed at end of Part A.

Policy 6A - Development Needs 2016 - 2036

- A. During the Plan Period (2016-2036) Wyre Forest District Council will make provision for, monitor and manage the delivery of housing, employment land, retail and offices at the levels of development contained in Table 6.0.1. This delivery will be in accordance with the site allocations set out in Part C of this document.
- B. As required by the Duty to Co-operate [Footnote: Section 110, Localism Act (2011) relating to unmet need], due consideration will be given, through a future **early** review of the WFDC Local Plan where appropriate **necessary and in accordance with the NPPF**, to the housing needs

of neighbouring local authorities [**Footnote: This includes the Black Country Local Authorities who are currently preparing a joint Local Plan Review**] in circumstances when it has been clearly established through the local plan process that these needs must be met through provision in the Wyre Forest District area. **The review will consider the need for additional growth and plan appropriately for this if the need has been clearly evidenced and justified.**

Wyre Forest Development Needs 2016-2036

Type of Development	Amount of Development Required	Annual requirement
Dwellings (net additional)	5,520	276 (minimum)
C2 use (Institutional / Care home bed spaces)	487 bed spaces	Not applicable
Employment Land	29 hectares	Not applicable
Comparison Retailing	Zero	Not applicable

Reasoned Justification

6.4 Housing provision will be made for 5,520 dwellings (net) which includes market housing and affordable housing provision. A separate provision for 487 C2 (e.g. care homes / nursing homes bed spaces) will also be made. This level of housing is considered appropriate by Wyre Forest District Council in order to meet the challenges posed by the need for economic regeneration of the District and the provision of an improved level of affordable housing without undermining the local housing market. Key objectives of the Development Strategy include making provision for:

- The right amount of land and type of employment uses at readily accessible locations in which business will thrive and be resilient to current and future challenges;
- Sufficient housing provision that enables the labour force to live locally and contributes to achieving the right mix of housing types so that the wide range of housing needs can be met;
- Whilst the current quantum of available retail provision is considered to be broadly correct it will be necessary to ensure that the retail offer is appropriate to the future requirements of the District. Therefore, whilst it is not anticipated that there will be a need for any additional large scale provision, it may be appropriate for the offer to evolve in order to meet future requirements. Where additional requirements are anticipated to be required to support housing allocations these will be detailed by the specific site allocation policies in Part C of this document.
- Infrastructure that supports communities which are housing the labour force and facilitates the movement of people to their employment, education and other services through the alignment of the phasing of development and supporting infrastructure, including green infrastructure.

6.5 The National Planning Policy Framework (2018) requires that Local Planning Authorities, as a minimum, meet their objectively assessed needs (OAN) for both market and affordable housing (as far as is consistent with other policies in the Framework). The most up-to-date work on OAN, and that which is used in this Local Plan is the Housing Needs Study 2018 (HNS, 2018). This 2018 study uses an updated set of demographic projections, taking account of information including 2016 based Sub-National **Population** Projections from ONS and the **most up-to-date** 2016 based Household Projections. It also takes account of the Government's new standardised methodology for calculating housing need. This HNS (2018) study supercedes all previous Objectively Assessed Needs Reports

published by the Council. **It is important to note that the Council has not used the 2014 based Household Projections as this would have given a lower housing figure of 248 dwellings per annum. This is because the Council wishes to be ambitious with its housing requirement figure in order to support economic growth and affordable housing delivery. This approach is supported by the PPG, which states: “The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.” (PPG, Paragraph: 010 Reference ID: 2a-010-20190220).**

6.6 As such the figure of 5,520 (from the HNS study, 2018) reflects the necessary housing requirement to satisfy housing need plus additional need arising from the necessity to provide additional affordable housing and opportunities for economic growth. The same report separately identifies an additional requirement of 487 C2 (e.g. care homes / nursing homes bed spaces).

6.7 The Employment Land Review (ELR) (2018) report appraised a range of employment land projections for Wyre Forest District using a variety of methodologies in accordance with the former Planning Practice guidance (as this being the most up-to-date PPG at the time). A range of factors were considered within the report to help inform the judgement on the appropriate level of employment need for the district. The ELR report concludes that the employment land requirement for Wyre Forest District should be 29ha of land between 2016 and 2036. The Local Plan seeks to allocate sufficient employment land to accommodate this employment need of 29ha.

Annual requirements

6.8 Table 6.0.1 also sets out the annual **minimum** housing requirement for the Wyre Forest District. This is derived by a simple division of the housing requirement (5,520) by the number of years that the Plan will apply (20 years). This equates to an annual **minimum** housing requirement of 276 dwellings. As discussed in Policy 8B (Affordable Housing) there will be a number of elements that make up the affordable housing component.

6.9 Sites considered unsuitable (e.g. because of flood risk), not viable or not deliverable have been excluded. As in all plan-making it is also necessary to adopt a precautionary approach to allow for sites that may not be delivered - this is particularly the case for sites with a poor viability (such as brownfield sites). It is therefore necessary to identify some additional sites so that in the event of a site not coming forward, or sites being excluded from the final Plan (consequent to further evidence including consultation outputs), the District is able to demonstrate that the housing and employment requirements can still be met and flexibility is demonstrated.

6.10 In order to achieve the required flexibility it is necessary to propose allocations in excess of the housing requirement of 5,520. The Plan therefore includes an over allocation of 15%, to allow for sites not coming forward and to be able to maintain a five year housing land supply. At the time of preparation of this consultation document the Council's understanding of how this might be informed was guided by the following available data.

Source of Supply	No. of <u>Net Dwellings</u> (approx)
Completions (1st April 2016 to 31st March 2019)	585
Under Construction at 1st April 2019	142
Commitments not yet started at 1st April 2019 * The Commitments shown in the table do not include lapse rates. At 1st April 2019 , the lapse rate was 4% . Applying 4% to the commitments not yet started = 484 x 96% = 465 . For further information on completions and commitments please refer to the Council's 5 Year Housing Land Supply Report, which will be updated annually throughout the Plan Period).	484
Strategic Allocation Site - Lea Castle Village	1,400
Strategic Allocation Site - Kidderminster Eastern Urban Extension	1,440
Remaining Development Sites:	
Kidderminster Town	990
Stourport-on-Severn	984
Bewdley	225
Rural Settlements	115
Total:	6,365

Duty to Co-operate

6.11 It is clearly demonstrated by the HNS (2018) that, unusually in the West Midlands, the Wyre Forest District Council area is co-terminus with the Wyre Forest Housing Market Area. As such the housing requirement reflected by this Plan is based solely on that required for the needs of Wyre Forest District. However, this does not negate the need for the Plan to be prepared in consultation with neighbouring and near-by authorities (e.g. other Worcestershire districts, Birmingham and the Black Country, South Staffordshire, Shropshire); accordingly Wyre Forest District has co-operated with authorities that are both adjoining and beyond in order to consider strategic priorities for the delivery of homes, including cross-boundary requirements. **Statements of Common Ground will be prepared where necessary for the purposes of the examination of the Local Plan and will** The evidence base documents the joint working and other activities demonstrating effective co-operation consistent with the Duty to Cooperate legal requirement and the NPPF.

Management of land supply

6.12 The Council's monitoring of the provision of dwellings demonstrates that, whilst under normal economic circumstances, a fairly consistent supply can be achieved. Under unusually buoyant or depressed economic circumstances extremes (both high and low) of delivery can be evidenced. It is therefore prudent to ensure that the authority is in a position to respond quickly to changing circumstances. Positive planning measures may be required to help bring forward sites for development earlier in the plan period to ensure a five-year supply of sites is able to be sustained. Whilst not exhaustive such initiatives might include:

- Working with house builders / landowners / Housing Association Registered Providers, to monitor and progress the housing supply and to identify any causes of supply problems and where appropriate to act on feedback received.
- Production of detailed Planning Briefs and / or area-based Supplementary Planning Documents, to increase certainty for developers on the progression of sites through the planning process.

- c. Regular meetings with stakeholders about the major urban extensions.
- d. As part of the preparation of Planning Briefs, indicate different development permutations to accommodate different viability scenarios.
- e. Pre-application discussions with developers, landowners and their agents to increase certainty in the development management process.
- f. Sensitive application of policy where issues around scheme viability have been clearly demonstrated.
- g. Prioritise public sector land.
- h. Potential funding streams, such as Homes England and other public funding sources.
- i. Testing of viability through an independent study and liaison with developers about viability issues.
- j. Annual update of the Council's Brownfield Land Register.
- k. Bringing forward Reserved Housing Sites, subject to Policy 7B.

Policy 6B - Locating New Development

A The Development Strategy and the site allocations in this Plan (as described by Policies 6C – 6F) are based upon the following principles:

- i. Provide accessible, attractive employment sites and positive policies to deliver job creation opportunities.
- ii. Provide for and facilitate the delivery of sufficient accessible housing to meet **as a minimum, the** objectively assessed needs to 2036.
- iii. Encourage the effective use and re-use of accessible, available and environmentally acceptable brownfield land.
- iv. Safeguard and (wherever possible) enhance the open countryside.
- v. Maintain the openness of the Green Belt (as identified on the Policies Map).
- vi. Focus most development in and adjacent to the urban areas, where both housing needs and accessibility to more effective public service provision are greatest.

B Windfall development proposals will be assessed in accordance with the settlement hierarchy described below:

Wyre Forest Settlement Hierarchy

Category	Settlements Included	Role	Suitable Development
Main Town	Kidderminster	<ul style="list-style-type: none"> Administrative centre of the District Focus of public services Focus of employment 	<ul style="list-style-type: none"> Focus of large scale housing provision including Kidderminster Eastern Extension Utilisation of appropriate brownfield and greenfield sites, subject to the more detailed Plan policies Comparison and convenience A1 retail (to meet District requirements and

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			<ul style="list-style-type: none"> needs) Commercial leisure Large and small scale offices Residential Employment Hotels, tourism and leisure Sports and education facilities Major services
Large Market Town	Stourport-on-Severn	<ul style="list-style-type: none"> Comprehensive range of local services Employment for residents and those in nearby rural areas River/Canal based Tourism and leisure 	<ul style="list-style-type: none"> Support role in the provision of larger scale housing Utilisation of appropriate brownfield and greenfield sites, subject to the more detailed Plan policies Convenience A1 retail (to meet the needs of Stourport-on-Severn) Local services Employment, offices and commerce <u>Sport and recreation uses</u>
Market Town	Bewdley	<ul style="list-style-type: none"> <u>A range of local services</u> Employment opportunities especially for rural area west of the River Severn Tourism and leisure 	<ul style="list-style-type: none"> Convenience A1 retail to meet local needs. Employment, offices and commerce Housing to meet local needs <u>and to ensure long-term vitality and viability</u> Leisure and business tourism Local services
Villages covered (washed over) by Green Belt	Chaddesley Corbett Wolverley Upper Arley	<ul style="list-style-type: none"> Varying ranges of local services and facilities 	<ul style="list-style-type: none"> Housing to meet local needs via allocated sites and rural exceptions sites in appropriate circumstances. Local services. Small scale rural employment including

			offices
Other villages and rural settlements	<p>Inset Green Belt:</p> <ul style="list-style-type: none"> Fairfield Cookley Blakedown Wilden Lea Castle <p>Non Green Belt:</p> <ul style="list-style-type: none"> Clows Top Rock Bliss Gate Far Forest Callow Hill 	<ul style="list-style-type: none"> Varying ranges of local services and facilities Settlements to west of River Severn tend to have a widely dispersed catchment for employment, services etc 	<ul style="list-style-type: none"> Housing to meet local needs via allocated sites and rural exceptions sites in appropriate circumstances. Infill development within settlement boundary Local services Small scale rural employment including offices
New Village	<p>Inset Green Belt:</p> <ul style="list-style-type: none"> Lea Castle Village 	<ul style="list-style-type: none"> New sustainable village with enough housing to generate a new village centre with local facilities and primary school. To also include employment use. 	<ul style="list-style-type: none"> Residential Employment Sports and education facilities Local services

C Where a community decides to develop a Neighbourhood Plan the District Council will cooperate with and support the community in this activity so that greater local control over the location of development can be exerted whilst supporting the delivery of the Local Plan. Neighbourhood Plans will need to be consistent with the **strategic** policies of the Local Plan as a whole and will be expected to support the District in meeting its development needs.

D The open countryside is defined as land beyond any development boundary. In the open countryside development will be strictly controlled and will be limited to dwellings for rural workers, replacement dwellings and rural exception sites (Policy 8C); employment development in rural areas and buildings for agriculture and forestry (Policy 21B) and renewable energy projects (Policy 24B) and development specifically permitted by other Wyre Forest Local Plan policies.

E The Green Belt (as identified on the Policies Map) will be maintained and development proposed within the Green Belt will be considered in accordance with national policy as set out in the NPPF, and with the policies set out in this Local Plan. In particular, Local Plan Policies 7A, 7B, 18B, 25A and 35.

Reasoned Justification

6.13 The development strategy is driven by the Wyre Forest vision and its associated objectives. It brings together land use, development and infrastructure considerations that flow from the economic,

environmental and social characteristics of the area. The Sustainability Appraisal (SA) demonstrates that the proposed development strategy will help deliver the SA objectives.

6.14 The new development strategy builds upon the previous Wyre Forest Core Strategy which concentrated development on the large amount of brownfield land in the urban core of the District. Whilst the new strategy continues to maximise the benefit of this resource it will no longer be possible to be entirely reliant on brownfield land meaning that some greenfield land take will be required. This is due to two key factors:

- a. much of the readily available deliverable brownfield land has now been developed;
- b. the housing requirement of Wyre Forest District is significantly greater than the availability of brownfield land.

6.15 The purpose of the settlement hierarchy is to provide a clear steer on the future role of the District's settlements and to focus new development in locations which will promote sustainable communities. The settlement hierarchy is based on an assessment of the services and facilities that are available in each settlement and further information on this can be found in the evidence base documents Wyre Forest District Settlement Hierarchy Topic Paper (2018).

6.16 The urban areas of the District have the greatest housing needs and are locations where the cost of public service delivery is relatively low. Accordingly the bulk of development needs that cannot be met via brownfield land (including brownfield land in the Green Belt) will be via greenfield land release adjacent to the main towns, especially Kidderminster. In the other settlements, the allocated growth and future development sites are primarily to meet local needs whilst at the same time ensuring the future sustainability of the settlement.

6.17 The villages and hamlets in Wyre Forest, particularly to the west of the River Severn, are characterised by close-knit communities that in many places retain links with the traditional rural economy as well as providing some limited services. Sites beyond development boundaries generally are less sustainable as access to local services and employment opportunities tends to be poorer and therefore it is appropriate that development in the open countryside is restricted to proposals which are supportive of more specific Local Plan policies, e.g. Policy 21B – Rural Employment.

6.18 Maintaining the identity and integrity of individual settlements is an important issue for local communities. To the east of the River Severn this is achieved by the West Midlands Green Belt designation. Green Belts serve five purposes (set out in the National Planning Policy Framework), which are:

- to check the unrestricted sprawl of large built up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.19 Locally, the Green Belt continues to serve all the purposes of national policy and the boundaries are considered to be strong and enduring. However, due to the exceptional circumstances of an increased housing demand coupled with a reduced amount of brownfield land and a very tightly constrained Green Belt boundary restricting the ability to develop sustainable locations the District Council considered it necessary to undertake a Green Belt Review through this Local Plan Review (NPPF para 136). Where the Green Belt is fundamental in preventing the neighbouring towns from merging (e.g. between Bewdley and Kidderminster along the A456 corridor and Kidderminster and

Stourport-on-Severn along the A451 corridor), it will be particularly important to ensure that the land remains open.

6.20 The nearest sub-regional centre to Wyre Forest District is Worcester which has a sub-regional function. Additionally, particularly in respect of commuting, there are links with the southern Black Country and Birmingham. Within the District the largest and most important retail and commercial centre is its administrative centre, Kidderminster, which also provides a focus for public services, comparison shopping, etc. This strategy will continue to support the role of Kidderminster and will seek to facilitate its further regeneration through the redevelopment of such key zones as Lion Fields (the Eastern Gateway) and Churchfields.

6.21 The other Main Town centres at Stourport-on-Severn and Bewdley are smaller and provide a smaller scale and range of retail and other services typically serving their own settlement and their hinterland of smaller settlements and villages. Centres in the villages and rural settlements are again smaller and will typically provide only a limited range of day-to-day retail and other services.

Policy 6C - Kidderminster town as the strategic centre of the District

Kidderminster will continue to be the strategic centre for the District and its role in providing a focus for new housing, commercial, employment, retail, office and leisure development is to be enhanced. New development will focus on the regeneration opportunities on the identified sites within and adjacent to the town. Two sustainable strategic allocation sites are proposed (see Policy 6D).

The future development needs of Kidderminster will be allocated and implemented through Policy 30 (Kidderminster Site Allocations) as well as the “ReWyre Renewed” Strategy.

Development proposals which help to promote Kidderminster as the tourism 'hub' of the District will be encouraged during the plan period. This includes the provision of supporting facilities such as sports facilities, hotels, conferencing facilities and developments that improve the evening / night time economy and cultural offer of the town. **Where the residual cumulative impacts of development on the road network are severe,** sustainable transport links and infrastructure to promote ease of access to the Wyre Forest, Stourport-on-Severn, Bewdley, West Midland Safari Park and Kidderminster Railway Station will be sought, where practical and viable.

Reasoned Justification

6.22 Kidderminster is a former carpet manufacturing town which has been, and is still experiencing economic restructuring as a result of the decline in activity of this industry. Consequently Kidderminster faces a number of economic challenges and contains areas which experience acute deprivation. The challenges include lower than average household incomes, low skill levels and poor educational attainment.

6.23 There is great potential for regeneration in Kidderminster. The Staffordshire & Worcestershire Canal and River Stour both run through the town centre, providing a significant opportunity to create new waterside destinations. Whilst much of the deliverable brownfield land in the town has now been redeveloped, Kidderminster still benefits from significant areas of brownfield land suitable for redevelopment most notably Lionfields (the Eastern Gateway) and Churchfields.

6.24 As the District's strategic centre Kidderminster has a unique role within the District. There are key opportunities to improve the town's tourism and employment roles, boosted by the Severn Valley

Railway, the West Midland Safari Park, and the economic success of the South Kidderminster Enterprise Park. Overall, opportunities to create additional employment and learning opportunities, improve the natural and built environment, increase tourism and provide new housing, through regeneration are all present in Kidderminster.

6.25 All new development should make a positive contribution to the vitality and viability of the town and support the creation of a safe, attractive and accessible urban environment and improve both the overall mix of land uses in the town and its connectivity to adjoining areas.

6.26 The development of a diverse evening/night time economy centred on Kidderminster is seen as an important element in driving the improvement of this strategic centre and the wider District. Careful consideration will be required to determine the number, type and scale of activities and uses to ensure that a rich, inclusive and safe environment is created.

6.27 There should be sufficient protection/provision of outdoor sports facilities as identified in the Playing Pitch Strategy.

Policy 6D - Strategic Allocation Sites

The strategic allocation sites are defined on the Policies Map and will come forward in line with the detailed requirements expressed by Policy 31 and Policy 32.

The proposed strategic allocation sites are:

- i. Lea Castle Village (the ex-hospital site at Lea Castle and wider site area) - Policy 31;
- ii. Kidderminster Eastern Extension - Policy 32.

Reasoned Justification

6.28 In recognition of the insufficient amount of sustainably located readily available land to accommodate the necessary housing and employment requirement two well-designed sustainable strategic allocation sites are proposed.

6.29 In line with the NPPF (Para 136) Wyre Forest District Council has determined the need for a review of the Green Belt within the District under the exceptional circumstances provision. This is to specifically accommodate larger scale development such as new settlements or major urban extensions and is necessary due to the scale of development needs identified for the District up until 2036.

6.30 The proposed housing requirement is 5,520 dwellings for the plan period plus an additional 487 C2 Institutional (e.g. care homes / nursing homes bed spaces). The Plan also allocates in excess of the housing requirement by 15% to allow for sites that may not come forward.

6.31 The Plan allocates an additional 2,097 dwellings on brownfield sites. Together with existing completions and commitments, this means that 49% of all housing developed in this Plan period will be on brownfield sites. These figures include 600 dwellings at Lea Castle ex-hospital site (this takes into account viability and flood risk issues). There is limited greenfield capacity on suitable and sustainable sites to the west of the River Severn.

6.32 Therefore to meet the needs of the growing population and ensure that sufficient high quality accessible land is available for residential and economic development the District has proposed two strategic allocation sites which will require the removal of land from the Green Belt. This will enable the delivery of planned sustainable urban development with accompanying primary school, local services and infrastructure. The proposed Lea Castle Village will also include some employment use. *(Note that the total Green Belt land take for the Plan equates to 2.1% for all of the Green Belt site allocations in the Plan).*

6.33 The District Council will continue to work proactively in these locations with existing landowners, stakeholders and other agencies to bring forward these strategic developments during the plan period.

Policy 6E - Role of Stourport-on-Severn and Bewdley as Market Towns

Within the District's market towns of Stourport-on-Severn and Bewdley, both of which have Conservation Areas as their town centres, the following development proposals will be sought:

- Employment, start-up business units and commerce, to provide local employment opportunities and enhance economic viability.
- Current A1 retail provision will be safeguarded where possible; however, diversification proposals will be assessed against their overall positive contribution to the town centre.
- New retail development proposals should be appropriate to the town's position in the District's settlement hierarchy.
- Developments which provide additional community and health facilities for the local area.
- Sustainable transport infrastructure should be enhanced to ensure ease of access to the town's services and facilities, particularly from the surrounding rural areas. Access from the market towns to the higher order services available in Kidderminster will also be improved where practical and viable.
- There will be some Green Belt release to enable the market towns to contribute to the housing requirement whilst addressing the need for sustainability and cost effective infrastructure provision (see Policy 33 and 34).
- Sufficient protection/provision of outdoor sports facilities.
- **Development within the towns' Conservation Areas must preserve or enhance those areas, the heritage assets contained therein and their settings.**

Stourport-on-Severn:

- Due to its role in the settlement hierarchy and mix of employment and service opportunities, Stourport-on-Severn is expected to make an important contribution to meeting the District's requirements for new homes. The focus will be on existing brownfield sites within the town ~~supplemented by some Greenfield release.~~ **urban area and sustainable, suitable greenfield sites such as the site at Pearl Lane (AKR/14).**
- Developments which will increase the variety and mix of the tourism offer in the town will be encouraged and facilities which focus on heritage tourism, particularly capitalising on the historic canal basins, will be especially promoted.
- Development within the three Conservation Areas should preserve or enhance those areas.
- The proposed allocations for Stourport-on-Severn are detailed at Policy 33.

Bewdley:

- Bewdley's contribution towards the District's housing need will be limited to ~~meet local needs on allocated sites.~~ **the site allocations for Bewdley in this local plan.** This reflects the town's conservation context and the more limited availability of jobs and services within the town. Some limited greenfield development will be permitted to enable this.
- The role of Bewdley as a sustainable tourist destination is to be enhanced, with sustainable transport links to the Wyre Forest, Severn Valley Railway, West Midland Safari and Leisure Park and Kidderminster Rail station being a particular focus, where practical and viable.
- Development within the Bewdley and Wribbenhall Conservation Areas should preserve or enhance those areas.
- The proposed allocations for Bewdley are detailed at Policy 34.

Reasoned Justification

6.34 Within market towns, local people and those in the surrounding rural hinterland, should be able to buy most things they need and have sufficient access to housing, jobs, education and entertainment.

6.35 The geography of the District means that Kidderminster is just 3 miles from each of the market towns with the potential for good public transport links between them. Therefore, the need for Bewdley and Stourport-on-Severn to provide facilities and services should be balanced with their proximity to Kidderminster and the services it provides in its function as the strategic centre of the District.

6.36 There should be sufficient protection/provision of outdoor sports facilities as identified in the Playing Pitch Strategy.

Stourport-on-Severn

6.37 With a population of 20,000 Stourport-on-Severn is a large market town that is well served by local amenities such as shops and community facilities. It is relatively well served by public transport, although some outlying housing estates have poor access to bus services. The town provides a good level of existing employment opportunities.

6.38 The town has the potential to accommodate a significant amount of new development on brownfield sites within or adjacent to the town centre. However, regeneration will need to be carefully considered in the context of the town's historic character and heritage in addition to the settlement hierarchy.

6.39 In Stourport-on-Severn town centre congestion is an issue because the current road layout, pedestrian arrangements and lack of alternative routes (including bridge access and capacity). In respect of future development in and around the town the strategic transport infrastructure in the town is therefore a key consideration. Accessibility to the town centre by alternative modes for residents and visitors alike is extremely important to the town's future functionality and viability.

6.40 Stourport-on-Severn has unique origins as a canal town and has five historic basins which have recently undergone a major restoration programme. The town is also located on the banks of the River Severn which has helped it become a popular visitor destination. The town is a particular

attraction for day trippers, especially for people from the Birmingham and Black Country areas. The tourism offer of the town has a great potential for generating economic activity, but this has not been fully utilised in the past. A key opportunity is available to promote Stourport-on-Severn's history as a canal town with its historic basins and take advantage of its heritage assets. This would help to enable the town to tap into new tourism markets and potentially attract a higher-spending, longer-stay visitor.

Bewdley

6.41 Bewdley has a smaller population at around 9,000 but has a greater interdependent relationship with the surrounding rural parishes.

6.42 There is a reasonable level of service provision in the town with shopping and community facilities to serve the local population. However, higher order services and goods are on offer in Kidderminster and therefore are available within a short distance from Bewdley.

6.43 Employment opportunities are very limited within the town with the majority of workers having to commute out to the surrounding areas.

6.44 Like Stourport-on-Severn, Bewdley is also a popular tourist destination. This is largely due to its attractive and historic Georgian architecture, its setting on the River Severn, the West Midland Safari Park and the Severn Valley Railway station close to the centre. The town's setting within the countryside is also an important factor and the Wyre Forest is located just on the town's outskirts. Therefore, Bewdley is well located within a tourist setting and provides opportunities for developing sustainable tourism.

6.45 The ability to accommodate new development on brownfield sites within or adjacent to the town centre is limited due to the heritage setting of the town as well as its topography and the Welch Gate Air Quality Management Area. Development within the town's Conservation Area itself, which covers most of the town centre, is especially sensitive and will need to preserve or enhance the special character and appearance of the area. There are few development opportunities within the built environment and conservation is a priority.

Policy 6F - Role of the existing villages and rural areas

Sustaining Community Facilities and Services

- Developments that provide the rural community with essential facilities and services will be supported in principle.
- The network of local groups of shops and public houses will be safeguarded in order to support nearby settlements and reduce the need to travel.
- Kidderminster, Stourport-on-Severn and Bewdley will remain the most sustainable places to provide higher order services and facilities to the rural areas, but access to them by public transport should be improved.
- **Where there is a need for new housing in existing villages, priority should be given to locations which are well connected to higher order settlements and which already have key services and facilities.**

Providing Housing for Local Need

- New residential development in the District's **existing** villages, rural settlements and other rural hamlets will be to meet local housing needs, as established through the Housing Needs Study and parish surveys (Policy 8C - Rural Exception Sites, and Policy 18B - Residential Infill Development).

The Rural Economy

- The rural economy will be supported by promoting development which contributes to rural employment sectors as well as encouraging appropriate farm diversification schemes.
- Development proposals will not be permitted where they would be likely to have direct and significant impact on the District's best and most versatile agricultural land.
- Historic farmsteads will be protected from inappropriate development (for details refer to Policy 26 and Policy 28A).
- The provision of rural based workspace and live/work units will be permitted providing:
 - i. the proposals are small scale (i.e. not major development);
 - ii. that they are appropriate to the character of the area;
 - iii. that they do not have an adverse impact on the Green Belt.

Priority will be placed on the re-use or replacement of existing rural buildings.

The proposed allocations for the **existing** villages and rural areas of Wyre Forest are detailed at Policy 36.

Policy 35 identifies proposed allocations for previously developed sites in the Green Belt.

Reasoned Justification

6.46 Agriculture is the predominant land use within the District's rural areas. The quality of agricultural land is generally very high in the area running from east and south east of Kidderminster to the District boundary. There are also significant blocks of high quality land to the north of Kidderminster and around Rock.

6.47 Economic and employment opportunities in rural areas go beyond the traditional land based and agricultural sectors. There are great opportunities for sustainable farm diversification, particularly with regard to the tourism and leisure sectors. New employment opportunity sectors such as creative industries and environmental technologies may also be available in rural areas. The provision of superfast and ultrafast broadband in addition to the availability of mobile infrastructure able to provide 2G, 3G, 4G and increasingly 5G coverage will be essential in developing the economic base of the rural areas.

6.48 Equestrian activities are also prominent uses in rural areas. Commercial equestrian development in particular, can contribute significantly to the rural economy and provide employment for local people. However, equine related development will need to be balanced with the potential impact on the landscape and character of the rural environment and the continued need to preserve the best and most versatile agricultural land to enable localised food production in the future.

6.49 However, the economic development of the District's rural areas does not need to be at the expense of environmental protection and enhancement and must be balanced by the pressure to regenerate the adjacent towns.

6.50 Sustainable living is as important in rural areas as it is in urban areas. Measures that encourage working practices that cut down on commuting and improve the work/life balance should be encouraged. It is also important to help establish lifestyle changes that support the local economy and the sustainability of the rural community. However, much of the rural area is close to the combined urban area of Kidderminster, Stourport-on-Severn and Bewdley and to the employment opportunities and services they provide. Therefore, significant numbers of the rural population will rely on these centres regularly to access these facilities. Transport links between the urban and rural areas should be improved to increase the sustainability of the relationship between the two areas.

6.51 The proposed Lea Castle Village (Policy 31) is not applicable to Policy 6F.

Policies Map

6.52 Throughout the Local Plan, reference is made to the Policies Map. This includes statutory designations for areas such as Green Belt, Sites of Special Scientific Interest (SSSI) and Nature Reserves. It also includes site specific allocations for residential, employment, retail and community uses. The map makes it easier to identify the major areas for change as well as those for protection.

6.53 The Policies Map and the maps throughout the Local Plan use Ordnance Survey base maps which are Crown Copy right protected (Ordnance Survey 100018317 (**2019**)).

6. Amendments to Policy 8G – Site Provision for Travelling Showpeople

Amendments to wording are shown in **bold text and underlined**.

Local Plan Pre-Submission – Policy 8G

Policy 8G - Site Provision for Travelling Showpeople

The **former Burlish Golf Course Clubhouse site** ~~land to rear of Zortech Avenue (as shown on Policies Map~~ **as site LI/12**), is allocated to meet the immediate needs of the existing Travelling Showpeople family currently living within the District. Any proposals brought forward should submit suitable arrangements for sewerage treatment in addition to satisfactory drainage measures. The scale of the site should be to meet the specific housing needs of the existing family.

Reasoned Justification

8.39 Whilst the GTAA did not identify a requirement for additional plots for Travelling Showpeople within the District, there is an existing established site through lawful use at Long Bank, Bewdley. Due to the impending displacement of the current occupiers from this site there is now a requirement to formally allocate a site to meet these needs. Therefore there is a specific current need for one family site to be allocated within the District through the Local Plan Review process.

8.40 Previous site assessments and consultation undertaken to inform the Site Allocations and Policies Local Plan were unsuccessful in securing the allocation of a site for travelling showpeople. Whilst there is evidence to suggest a track record of delivery through the development control process to meet identified Gypsy and Traveller pitch needs, it has proved more difficult to meet the identified need in association with Travelling Showpeople.

8.41 Further to the provisions as set out in the PPTS, the possibility of making an exceptional limited alteration to the Green Belt Boundary to allocate a site to meet this specific identified need will now be considered through the Local Plan Review. The District Council has consulted on options and has now allocated a site on **the former Burlish Golf Course Clubhouse site** ~~land to rear of Zortech Avenue (as shown on the Policies Map~~ **as site LI/12**).

8.42 Whilst Gypsy and Traveller sites are essentially a residential use, sites for Travelling Showpeople differ in that they need to provide a secure, permanent base which is suitable for storage and maintenance of equipment when it is not in use. Most showpeople need to live alongside their equipment and as such sites need to be suitable for both residential and business use. Sites need to be designed in an appropriate manner which minimises any impacts on neighbouring uses and occupiers. Applicants will be required to demonstrate adequate access for their use and that they have sought a connection to the mains foul sewer in the first instance. Proposals should not have a detrimental impact on nature conservation.

7. Amendments to Chapter 10 – A Good Place to do Business

Amendments to wording are shown in **bold text and underlined**.

Page.78 Table 10.0.1

10.7 Table 10.0.1 Employment Allocation Sites

Site reference number	Site	Size in hectares
BHS/10	Frank Stone Building	0.32
BHS/11	Green Street depot	0.2
BHS/17	Rock Works	0.36
FPH/8	SDF	4.3
FPH/10	British Sugar Phase 2	2.96
FPH/23	British Sugar Plot D	1.84
FPH/24	Romwire	5
FPH/27	Adj Easter Park	2.53
FPH/28	Hoobrook Site	0.25
FPH/29	VOSA Worcester Road	1.72
<u>LI/10</u>	<u>Land r/o Zortech Avenue</u>	<u>1.48</u>
<u>LI/13</u>	<u>Land off Zortech Avenue</u>	<u>1.94</u>
MI/3	Parsons Chain	1
MI/18	North of Wilden Industrial Estate	0.22
MI/26	Ratio Park	0.69
MI/33	Wilden Industrial Estate	0.34
MI/34	Oakleaf Finepoint	1
<u>WFR/WC/15</u>	<u>Land off Park Gate Road, Lea Castle</u>	<u>0.34</u>
<u>WFR/WC/32</u>	<u>Stourbridge Road, Lea Castle</u>	<u>7</u>
BR/RO/21	Alton Nurseries	1
WFR/ST/9	Cursley DP	0.7
TOTAL SITES		<u>35.19</u>

8. Amendments to Chapter 13 – Transport and Accessibility

Amendments to wording are shown in **bold text and underlined**.

13 Transport and Accessibility

Policy 13 - Transport and Accessibility in Wyre Forest

Managing Travel Demand

- A. Proposals must demonstrate that:
 - i. the location and layout of development will minimise the demand for travel;
 - ii. they offer viable sustainable transport choices, with a particular focus on active travel modes (walking and cycling);
 - iii. they address road safety issues; and in particular,
 - iv. they are consistent with the delivery of the Worcestershire Local Transport Plan objectives.
- B. Travel Plans will be required for all major developments. These must set out measures to reduce demand to travel by private cars and must seek to promote and support increased walking, cycling and public transport use for a range of trip purposes through agreed targets and monitoring arrangements. The Travel Plan must follow the guidance set out in the National Planning Policy Framework.
- C. New development should have regard to the principles and design criteria set out in Manual for Streets 1 and 2, the Worcestershire Local Transport Plan compendium and the Worcestershire Streetscape Design Guide.

Providing Alternative Modes of Travel

- D. Priority will be given to improving infrastructure, technology and services to support active travel (walking and cycling) and passenger transport (bus, rail and community transport) during the plan period. In accordance with Policy 12 on Strategic Infrastructure, development will be expected to contribute to the provision of sustainable transport infrastructure, technology and services necessary to support that development, either through direct investment or by financial contributions.
- E. In order to promote greater transport choice in rural areas, community transport and innovative transport projects, including those that promote the use of new vehicle technology, will be encouraged in conjunction with new development proposals.

Delivering Transport Infrastructure to Support Economic Prosperity

- F. The following transport schemes, as identified within the Worcestershire Local Transport Plan, are the most significant for the successful implementation of the WFLPR:
 - WFST 1: Kidderminster Transport Strategy Major Scheme.
 - WFST 2; Transport Telematics Investment Package (all towns).
 - WFST 3: Active Travel Corridor: Bewdley to Wyre Forest (Dowles Link).
 - WFST 4: Mustow Green Junction Enhancement Scheme.
 - WFST 5: Blakedown Rail Station Enhancement Scheme.

- The schemes listed in the Kidderminster, Stourport -on-Severn and Bewdley Packages.
- SWAT 10: Stourport to Hartlebury Station (Leapgate Line) Active Transport Corridor.
- In addition schemes will require implementation to support the level of development proposed in the Local Plan Review.

- G. Development proposals will not be permitted if they are likely to prejudice the implementation of the transport schemes set out in clauses F, the implementation of identified highway improvements or traffic management schemes, or the operation of existing or proposed public transport facilities.
- H. The following sites and corridors will be safeguarded from development that would prejudice future enhancement of the rail network and strategic access to it:
- Worcester-Kidderminster- Stourbridge junction – Birmingham Snow Hill line.
 - Severn Valley Rail Line.
 - Leapgate Lane former rail alignment (Stourport to Hartlebury).

Transport Assessment Strategy

- I. Transport assessments are required for all major developments and must be carried out in compliance with relevant national and local policies and guidance, including the Worcestershire Local Transport Plan compendium.

Freight Proposals

- J. Any industrial or commercial development that is likely to generate freight movements of more than 10 vehicular trips per day will be required to carry out an assessment of its impact on the local road network and environment and the suitability to accommodate the increased traffic. Wherever possible, such development should be located on or near the principal road network.

Implementation

- K. Financial contributions from development towards transport infrastructure will be secured through developer contributions and, if appropriate, the Community Infrastructure Levy Charging Schedule.

Reasoned Justification

13.1 The Wyre Forest Local Plan Review recognises that the quality of transport provision and the accessibility of the District greatly affect regeneration, economic diversification and growth, and the quality of life of its residents and visitors. Traffic congestion, in particular, is a major cost to the local economy, has the potential to constrain future growth, and is a major cause of environmental pollution, including deteriorated air quality and ambient noise, especially within the urban areas.

13.2 There are two Air Quality Management Areas in the Wyre Forest District: one at Welchgate in Bewdley Town Centre and one at Horsefair/Coventry Street and the adjacent section of the Kidderminster Ring Road. Both locations are particularly challenging to mitigate; the former because of historic, dense street patterns and the latter because of traffic volumes. **The introduction of the Churchfields Master Plan scheme will significantly improve Air Quality in the Horsefair area of the Kidderminster Ring Road.** In residents' surveys, concerns regarding traffic congestion as well as the quality of roads and pavements, sit second only to crime concerns in relation to satisfaction with living in the District.

13.3 Sites on the highway network such as the A449 Worcester Road, the A451 Kidderminster Ring Road and its approaches, and the A448 between Kidderminster and Bromsgrove suffer from significant congestion during peak times; the A456 near the West Midlands Safari Park suffers from high levels of traffic in the summer months, when visitor numbers are highest. Furthermore, the Kidderminster Ring Road creates a barrier and 'collar' effect which deters pedestrian and cycle journeys to and from the town centre, including links to Kidderminster Railway Station/SVR on Comberton Hill.

13.4 Constrained by its single river crossing, highway network and the location of the main car parks to the west of the town centre, high levels of traffic are channelled through the historic centre of Stourport-on-Severn. These high traffic levels have resulted in borderline Air Quality Management Areas and have a detrimental impact on regeneration proposals. Bewdley town centre is also constrained by its single river crossing and narrow historic street pattern, which results in localised congestion and reduced dispersal of vehicular emissions. This has resulted in deterioration in ambient air quality in Bewdley Town Centre and the designation of the Air Quality Management Area in Welchgate.

13.5 If traffic growth trends continue with a reliance on the private car, many more of the District's main urban and interurban arterial routes will become increasingly impassable due to congestion beyond traditional peak times. Further growth in the District, especially as part of the regeneration of key employment and town centre sites such as the Churchfields development (Kidderminster), has the potential to exacerbate traffic congestion unless delivered in conjunction with investment in transport infrastructure, technology and services. In addition to private cars, the poor performance of the highway network in the form of congestion has significant impacts on the passenger transport network (including bus/rail integration), freight and small delivery movements, taxis/private hire journeys and trips taken by pedestrians and cyclists.

13.6 To tackle traffic congestion, significant changes in travel patterns and travel behaviour is necessary on a local neighbourhood and District wide level. This will require investment in transport infrastructure and services, and the adoption of policies that ensure the closer integration of land use and transportation planning, to help manage demand on the local transport network. Specifically, a strong focus is required on reducing the need to travel and encouraging use of other modes of transport (travel choices), especially for shorter trips, to improve accessibility and tackle traffic congestion. Nationally and at the local level, evidence and experience consistently proves that even small shifts away from single-occupancy car use to walking, cycling and passenger transport can deliver significant improvements to access to key services and facilities.

13.7 The recent completion of the Hoobrook Link Road (opened Sept 2016) will help ease delays along the A451 Stourport Road corridor and bring significant economic benefits to the area; however, traffic congestion cannot just be tackled by building new roads, as this approach is unaffordable and so unrealistic. Investment in transport infrastructure, technology and services across all modes of transport will be required to accommodate the growth in travel demand without increasing travel times, congestion and the associated costs that can undermine economic performance.

13.8 Traffic congestion is a significant challenge for freight movements and networks, and businesses rely on this network for access to raw materials and delivery of finished products. Reducing delays on the highway network to promote consistently reliable journey times is especially important for road freight operations and to promote economic growth. Tackling 'pinch points' in the network is very important to the freight sector, as is investment in Intelligent Transport Systems (ITS). At the hub of ITS is Urban Traffic Management Control (UTMC), which provides the facility to integrate a wide variety of information on highway network conditions from numerous sources/systems to support

network management and provide comprehensive travel information across a wide range of communication channels.

13.9 In addition to road based freight, future proposals for employment development, particularly along the Stourport Road Employment Corridor, should have regard to the possibility of utilising the existing rail infrastructure for the sustainable movement of freight.

13.10 To promote further development, economic growth and tackle traffic congestion, the Wyre Forest District will need to have:

- High-quality active travel routes and corridors (walking and cycling) to provide an attractive, direct travel choice for shorter distance journeys, particularly in urban areas.
- Excellent access to rail stations and improved rail services;
- A convenient and efficient urban passenger transport network;
- An efficient highway network with good links to the strategic highway network, to enable the efficient movement of goods and services essential to support economic activity and growth.

Highway Network

13.11 The District does not benefit from local access to the motorway network (M5); however, it has good connections to the Black Country and wider West Midlands Conurbation to the north/west, Bromsgrove and Redditch to the east, and Worcester to the south, provided by the local principal road network.

13.12 The main highway corridors are:

- A442 - runs north/south through the District and Kidderminster town centre linking Droitwich and Bridgnorth;
- A448 - runs Kidderminster- Bromsgrove-Redditch;
- A449 - runs north/south through the District and the eastern side of Kidderminster town centre, linking Worcester and Wolverhampton;
- A450 – runs in the south of the District linking Stourbridge and Hagley to Torton, near Hartlebury;
- A451 - runs north/south through the District and Kidderminster town centre (incorporating the Kidderminster Ring Road) linking Stourport-on-Severn and Stourbridge;
- A456 - runs east/west through the District providing the main route from the West Midlands conurbation to Kidderminster, Bewdley and on to the Marches.

13.13 There are significant challenges with traffic congestion in Kidderminster and Stourport town centres in particular and intervention is needed to support regeneration, economic diversification and growth. This will require new active travel links and potentially the construction of some new sections of highway and alterations and improvements to existing roads and junctions, if these can be justified. In particular, focus is needed to enhance the performance of 'pinch-points' on the existing transport network where journey times and costs are increasing. It is hoped that the recent opening of the Hoobrook Link Road will release capacity on the A451 Stourport Road corridor which may offer opportunities for infrastructure enhancements to benefit buses, pedestrians and cyclists.

13.14 There are a number of 'pinch points' on the inter-urban highway network such as the junction of the A448 and A450 at Mustow Green, where significant investment is required to improve the efficiency of the junction to cater for existing, and the forecast increase, in traffic demand. Development in intelligent transport systems (telematics), such as Variable Message Signs and Real

Time Information Systems, will increasingly have a role in managing demand on the highway network and investment will be required to develop and maintain these systems so that the network functions more efficiently.

Rail Network

13.15 There are two rail stations within the District, Kidderminster and Blakedown, both providing important links with the West Midlands conurbation and Worcester; there are also direct trains from Kidderminster to London (Marylebone) via Birmingham Snow Hill. Whilst having a good service to Birmingham and Worcester, Kidderminster's connectivity southwards from Worcester depends upon the 2-hourly frequency Great Malvern-Bristol service and connectivity at Cheltenham Spa, with the result that it is often quicker and faster to travel to destinations south of Worcester via Birmingham City Centre. Northbound journeys from Kidderminster require a change either between Birmingham Snow Hill/Moor Street and Birmingham New Street or at Smethwick Galton Bridge.

13.16 Kidderminster Rail Station is the second busiest in Worcestershire, representing nearly 20% of all rail travel in the County, dominated by commuter flows into Birmingham. The service provides valuable links for employment, retail, leisure and education, and is well used in both directions, with the highest demand during weekday peak periods. It is recognised however, that the facilities at Kidderminster Rail Station need to be improved and investment is necessary for enhancements to cater for the expected doubling of passenger numbers by 2043.

13.17 The Worcestershire Local Enterprise Partnership (WLEP) Strategic Economic Plan (SEP) highlights a number of challenges facing the County and notes that "there is considerable scope to enhance Worcestershire's rail infrastructure and services". In the SEP there is clear commitment to support the Kidderminster Rail Station Enhancement scheme as a short-term 'Local Growth Fund' initiative, to actively improve accessibility to and from the County by rail, and reduce reliance on private car travel.

13.18 The proposed enhancements include a new station building and improved access for all modes that provides a high quality transport gateway to Kidderminster and the Wyre Forest that is better integrated with the Severn Valley Railway (SVR) and other key business and tourist destinations. To maximise the benefits of the Rail Station enhancements, it is vital that investment go toward measures to enhance bus/rail integration and active mode improvements; in particular, toward improved walking and cycling links into and through Kidderminster town centre and surrounding residential areas. This recognises that increased demand to travel cannot be met by the car alone; travel choice is essential to support sustainable growth of rail patronage in the longer term.

13.19 To complement the planned enhancements to Kidderminster Rail Station and rail connectivity for the District, the emerging Worcestershire County Council Rail Investment Strategy includes evidenced aspirations for the following rail access improvements:

- Extending London Paddington-Worcester services to Droitwich Spa and Kidderminster;
- Provision of a new direct train service between Kidderminster, Worcester, Cheltenham Spa, Gloucester, Bristol Parkway and Bristol Temple Meads.

13.20 The emerging Rail Investment Strategy also highlights the need to address poor journey times between Kidderminster and Birmingham, where the average travelling speed is just 33mph.

13.21 Although patronage is relatively low at Blakedown Station, it is recognised that investment is required to cater for the significant forecast growth in rail travel with enhancements required to include:

- Improvements to passenger information and station facilities for passengers;
- Improvements to walking /cycling routes to the station;
- Improvements to access arrangements for cyclists and provide additional new cycle storage facilities;
- Set-down and pick-up facilities for taxi users and operators;
- Improve facilities for passengers with disabilities;
- Provision of a suitably sized station car park.

13.22 The opportunities to increase car parking provision at Kidderminster Rail Station are limited and so improving parking provision at the alternative stations (Blakedown and Hartlebury) will be essential to support anticipated rail growth in the Wyre Forest.

13.23 The South Worcestershire Transport Strategy (covering the City of Worcester, Wychavon and Malvern Hills Districts) includes aspirations to enhance facilities and services at Hartlebury Station which will offer increased travel and economic growth opportunities for Wyre Forest District, particularly for residents and businesses in Hartlebury and Stourport-on-Severn. The proposals, similar in scope to those for Blakedown Station, suggest enhancements to facilities to cater for the forecast growth in rail travel. The Worcestershire County Council LTP4 includes proposals for the promotion of 'Active Travel Corridors' and a strategic corridor identified is the Stourport to Hartlebury Station (Leapgate Line) Active Travel Corridor. This Active Travel Corridor aims to focus investment in walking and cycling links along the corridor to create a comprehensive, integrated off-road network linking residential areas with key trip attractors, including rail stations.

13.24 The Severn Valley Railway (SVR) is one of the leading heritage railways in the UK, operating over a 16 mile route between Kidderminster and Bewdley to Bridgnorth in Shropshire. The railway is one of the major tourist attractions in Worcestershire with over 200,000 visitors annually. There is potential for connections to the National Rail network at Kidderminster Rail Station to enhance services to/from Bewdley. This would, however, require significant investment and support from the Department of Transport (DfT) before this could be realised.

13.25 As part of the 70 acre 'Silverwoods' development on the former British Sugar site (A451 Stourport Road), now accessed via the new Hoobrook Link Road, works are on-going for a mixed used development including 250 homes. The outline planning consent for 'Silverwoods' includes provision for a new rail halt on the nearby SVR line to connect to the SVR and National Rail services. The viability of such a scheme will require further investigation before it is considered feasible.

13.26 The West Midlands Safari Park, located near the SVR line has ambitious plans for ~~an indoor water park, 1,000 delegate conference and exhibition centre and 250 bedroom hotel; also included are aspirations for a railway station on the SVR with connections on to the National Rail network at Kidderminster~~ **growth**. The Park is keen that the arrival of HS2 in Birmingham in 2026 may support further visitor volume growth.

13.27 Located near Norton in Wychavon District, the Worcestershire Parkway Major Scheme involves the development of a new parkway station at the intersection of the Bristol to Birmingham and the Hereford –Worcester- London main line railways; the station is due for completion during 2019. The poor quality rail service between Kidderminster and locations served by the Birmingham - Cheltenham - Gloucester - Bristol and Cardiff main lines is exacerbated by the lack of direct access to

cross-country services. Worcestershire Parkway aims to address this issue and improve access to national rail services. Parkway's location close to Junction 7 of the M5 will make it a strategic access point for the rail network for much of the County. It will have 500 car parking spaces and services to Parkway will initially include:

- Hourly GWR Worcester – London Paddington services;
- Hourly Cross Country Cardiff – Nottingham services.

13.28 The Worcestershire Parkway Station is likely to offer increased opportunities for Kidderminster, Blakedown and Hartlebury Stations in the future, including enhanced links to regional and national economic hubs in London and the South East, the South West and South Wales.

Road-Based Passenger Transport Networks (Bus, Taxi and Community Transport)

13.29 The provision of a high quality road-based passenger transport network is critically important for the social and economic wellbeing of ~~of~~ the District, providing essential access to a range of health, employment, leisure, education and retail opportunities and services, as well as rail hubs which provide access to a far greater range of destinations. Road-based passenger transport plays a significant role in tackling social inequality and, where subject to investment, can significantly reduce congestion and promote healthier lifestyles. The bus network in the Wyre Forest District is predominantly provided by a single operator, and has been subject to consistent underfunding for a number of years. The network suffers from poor service reliability and punctuality due to traffic congestion and a deteriorated bus fleet, lack of bus priority measures and poor interchange facilities at the district's rail stations. In the Wyre Forest, car ownership is lower than in other areas of Worcestershire, and particularly so in some of the more deprived neighbourhoods. In particular, certain protected groups (the young, the elderly and the disabled, for example) are particularly dependent on the bus network to access essential services and facilities needed to enjoy an acceptable quality of life. Furthermore, poor bus service provision in the evenings undermines the viability of the evening economy.

13.30 Kidderminster bus station, located adjacent to Weavers Wharf and delivered as a purpose-built facility as part of that development, has proved unpopular with local operators and so has been largely snubbed in favour of on-street bus stop facilities. It is necessary to develop a road based passenger transport (bus, taxi and community transport access strategy for Kidderminster Town Centre, to consolidate and improve the quality of facilities, as well as improving ease of interchange for this mode of transport. The provision of better road based passenger transport services and infrastructure, including bus priority measures, is a critically important element for better accessibility and economic growth in the District. Investment is also required to enhance transport technology such as Real Time Information systems and more comprehensive integrated ticketing arrangements.

13.31 Whilst most of the population of the District reside in the three main towns, there are rural hinterlands and villages whose residents are more reliant on the private car than those in the urban areas. In particular, the transport needs of the ageing population in rural areas will be increasingly difficult to meet, as the numbers of residents without access to a car rises. More demand-responsive forms of public and community-based transport, such as community buses, dial-a-ride cars and taxis, will be required if the needs of these residents are to be met. Developments in new technology are likely to enhance the ability of community transport providers to offer flexible, accessible and responsive solutions to unmet local transport needs. These improvements should not only benefit rural users but residents in those urban neighbourhoods where conventional passenger transport provision is poor.

Active Travel Modes (Walking and Cycling)

13.32 Walking and cycling should be a normal part of everyday life, and the natural choice for shorter journeys such as going to school, college or work, travelling to the station, and for simple enjoyment. Having access to safe and attractive routes for cycling and walking is essential to tackle rising obesity and deteriorated public health, reduce congestion, improve environmental quality and increase civic pride and wellbeing.

13.33 Rising obesity in the District is partly caused by sedentary lifestyles, so investing in high quality, continuous corridors for active travel modes (walking and cycling) will help to tackle this issue, by providing attractive environments and realistic alternative travel choices for shorter trips.

13.34 The District is suffering the legacy of a period where land use planning tended to favour the needs of the motorist, particularly apparent at the Kidderminster ring road where the pedestrian and cycling infrastructure is of a poor quality. Although the majority of roads within the District are available to cyclists, the speed and volume of traffic on some roads makes them undesirable, particularly for new or less physically able users. There have been improvements in walking and cycling infrastructure in recent years, however, continued investment in active travel modes, as well as improvements to the public realm in our urban areas, will help to encourage more uptake of sustainable modes and reduce dependency on the private car.

Worcestershire County Council Local Transport Plan 4: 2017-2030 (LTP4)

13.35 The Local Plan Review provides the main opportunity for the partners to contribute to the implementation of the District's transport network; the LTP4 and associated policies and overarching strategies, provide the basis on which to develop and deliver this network. It provides the policy and strategy context for major transport projects to enable Worcestershire County Council to bid for additional Government funding. It also provides a context within which developer contributions can be guided. The LTP4 document states that the challenges for the District are:

- To relieve congestion;
- To improve journey time reliability;
- To deliver transport schemes to mitigate the effect of the local plan to accommodate development growth.

13.36 The LTP4 aims to target investment in three broad areas:

- Transport Technology - technology is offering increasingly attractive opportunities to help manage demand on our networks, to tackle congestion and support growth. Modern traffic signals, for example, can intelligently manage traffic flows to respond to variable demand. Improved access to dynamic travel information through a variety of media will enable users of our transport networks to make more informed travel choices;
- Travel Choice - increasing realistic travel choice is critical to enable our economy to diversify and grow. In addition to enhancing access to travel information, we recognise that we need to prioritise investment in alternative modes of travel. In particular, our rail network has significant potential to accommodate and support economic diversification and planned growth. Significant investment will be required in our stations, rail infrastructure and rolling stock to provide the quality of services and facilities that the 21st century passenger expects. Rising obesity in the county is partly caused by sedentary lifestyles, so investing in high quality, continuous corridors for active travel modes (walking and cycling) as well as improvements to

the public realm in our urban areas will help to tackle this issue, by providing attractive environments and realistic alternative travel choices for shorter trips;

- Capacity Enhancement - the most expensive of the three areas, where suitable business cases can be identified to support investment, we will aim to fund and deliver capacity enhancements at key 'pinch points' to support development growth, address poor air quality issues and tackle congestion.

13.37 Detailed plans for the implementation of transport infrastructure will come forward during the lifetime of the LTP4 and their implementation will be essential to allow for the further investment in transport infrastructure and services needed to accommodate the increased travel demand associated with future development proposals. The funding to deliver this transport infrastructure is likely to come from a variety of sources and potential funding sources include:

- Section 106 Planning Obligations
- Other developer contributions;
- Community Infrastructure Levy;
- Integrated Transport Block
- Local Growth Deal

13.38 Developers will be required to demonstrate that they have given appropriate consideration to the potential impacts of development on the wider and strategic transport network, including that managed by Worcestershire County Council, Highways England and Network Rail.

Amendments to PART C of Local Plan – Proposed Allocations

9. Amendments to Chapter 30 – Kidderminster Town

Amendments to wording are shown in bold text and underlined.

Page 207 Policy 30 Kidderminster Town

The following lines in Table 30.0.1 have been amended:

Site Ref	Site description	Proposed Use	Indicative no. of dwellings	Gross site area (ha)	Removed from Green Belt?
BHS/18	Blakebrook School	M	<u>40</u>	1.38	N
FPH/23	Silverwoods extra care phase 1	H	<u>65</u>	0.45	N
<u>LI/10</u>	<u>Land r/o Zortech Avenue</u>	<u>E</u>		<u>1.48</u>	<u>Y</u>
LI/12	Former Burlish Golf Course clubhouse	<u>TS</u>		<u>1.35</u>	Y
<u>LI/13</u>	<u>Land off Zortech Avenue</u>	<u>E</u>		<u>1.96</u>	<u>Y</u>

Page 224 Revised Reasoned Justification for WA/KF/3 Land at Low Habberley

30.51 ~~The site is well contained by solid boundaries on three sides.~~ **The site is located on the NW edge of Kidderminster's urban area, approximately 1.5km from the town centre. The retention and enhancement of the western hedgerow boundary will allow for an improved residential edge to Habberley when seen from the north and provide a strong defensible Green Belt boundary. The site has good access to local shops and schools. The impact of any development on the nearby Habberley Valley Nature Reserve and Local Wildlife Site should be taken into account.**

Revised Policy 30.22 land rear of Zortech Avenue LI/10 (1.48Ha)

This land is proposed for removal from the Green Belt and allocation as ~~a site for travelling showpeople~~ **an employment** site.

- 1 Appropriate buffering will be required from the adjacent Burlish Top nature reserve and to screen the development from the adjacent dwellings on Birchen Coppice Estate
- 2 Vehicular access to be taken from Zortech Avenue

Reasoned Justification

~~The district council have been working to find a new site for a locally-based family of travelling showpeople for several years. They need to vacate their current winter home. The above site is now in the control of the District Council following the closure of the Golf Club. It is considered to be ideal for the proposed use as it is adjacent to industrial units but also on the edge of a residential area with easy access to education and other facilities required by the families. The site will be used mainly in the winter months for maintenance and storage of fairground equipment. The families will also live on the site when they are not travelling around the country. There is good road access for their long vehicles.~~ **This site is adjacent to the proposed site for the travelling showpeople and the former Ceramaspeed factory. It shares an access drive from Zortech Avenue with the neighbouring allocation.**

Page 228 Revised policy Former Burlish Golf Course Clubhouse LI/12

30.69 This site contains the former club house and associated buildings. They have been subject to arson attacks and **may** require demolition. It is proposed to allocate the land for employment uses **a travelling showpeople site.**

Policy 30.29 Former Burlish Golf Course Clubhouse LI/12

This land is removed from the Green Belt and allocated as a site for travelling showpeople.

1. Access should be taken from Zortech Avenue
2. The site should be landscaped with native plants to provide screening from neighbouring sites

Reasoned Justification

~~30.70 This site is adjacent to the proposed site for the travelling showpeople and the former Ceramaspeed factory. It shares an access drive from Zortech Avenue with the neighbouring allocation.~~ **The district council have been working to find a new site for a locally-based family of travelling showpeople for several years. They need to vacate their current winter home. The above site is now in the control of the District Council following the closure of the Golf Club. It is considered to be ideal for the proposed use as it is adjacent to industrial units but also on the edge of a residential area with easy access to education and other facilities required by the families. The site will be used mainly in the winter months for maintenance and storage of fairground equipment. The families will also live on the site when they are not travelling around the country. There is good road access for their long vehicles.**

Additional policy for new allocation:

Land off Zortech Avenue LI/13 (1.96 Ha)

This land lies adjacent to the access drive to the former Burlish Golf Course Club House and car park. It is proposed to allocate it for further employment development as it lies adjacent to the edge of the South Kidderminster Enterprise Park.

Policy 30.30 Land off Zortech Avenue LI/13

This site is removed from the Green Belt and allocated for employment development

- 1. Development should be designed to minimise impact on the neighbouring nature reserve.**
- 2. Building heights should be a maximum of 2 storeys and incorporate green roofs where practicable**
- 3. Landscaping of boundaries with native planting will be required to minimise impact on adjacent nature reserve and improve connectivity with surrounding wildlife corridors**
- 4. The developer should undertake a minerals resource assessment to inform design and to optimise opportunities for the partial extraction or incidental recovery of the underlying mineral resource either in advance of development taking place or in phases alongside it**

Reasoned Justification

The site is part of the former Burlish Golf Course which returned to local authority ownership in 2018 following the closure of the Golf Club. Land immediately to the south has been transferred to management by the Ranger Service and will form part of a 250 hectare country park which will act as a green buffer between Kidderminster and Stourport-on-Severn. The allocation offers the opportunity for a well-designed scheme for B1/2 uses in an edge of town location with direct access to the adjoining nature reserve.

Additional policy brought forward from Site Allocations and Policies Local Plan

South Kidderminster Enterprise Park

The area to the south of Kidderminster Town Centre provides many development opportunities. It is a thriving mix of businesses and residential uses combined with some of the most important natural habitat in Worcestershire. In recent years, large-scale redevelopment has begun at the former British Sugar site and the former Romwire site. The completion of the Hoo Brook Link Road has connected the Stourport Road Employment Corridor with the Worcester Road Employment Corridor and provided further development opportunities.

Development proposals within the SKEP area as shown on the policies map should:

- 1. Positively contribute to the economic well-being of the District**

2. Ensure that they are compatible with neighbouring areas and should not prejudice the operation and amenity of existing employment in the area
3. Enhance the relationship between sites and the Staffordshire and Worcestershire Canal and the River Stour corridor where appropriate
4. Positively enhance the Wilden Marsh and Meadows SSSI where appropriate
5. Ensure they incorporate appropriate remediation, building and drainage design in order to deal with any land contamination
6. Strengthen the visual harmony of the Stourport Road with its strong tradition of tree-lining and service roads and prominent set-back of the building line
7. Safeguard and promote the development of new enterprise units for start-up businesses
8. Take account of any flood risk

Reasoned Justification

Although the area of the SKEP covers some natural features and Green Belt land, development will only be permitted on previously developed sites. The site designation includes Wilden Meadows and Marshes SSSI in order to ensure that any impact on it is considered as part of any application for development and that any benefits from development can go towards enhancing this area.

10. Amendments to Chapter 33 – Stourport-on-Severn

Amendments to wording are shown in bold text and underlined.

Page 239 Policy 33 – Table 33.0.1 – remove AKR/18 Yew Tree Walk 85 dwellings

Policy 33 Stourport-on-Severn Site Allocations

Within and around Stourport-on-Severn, the following sites, as shown on the Policies Map are allocated. They should be developed in accordance with the criteria identified in respect of each site and all general policy requirements, including any necessary developer contributions.

Table 33.0.1 Allocated Sites in Stourport-on-Severn

Site Ref	Site description	Use	Indicative no. dwellings / employment land	Gross Site Area (Ha)	Remove d from Green Belt?
AKR/2	Cheapside	M	72	2.2	N
AKR/7	Swan Hotel / Working Men's Club	M	20	1.52	N
AKR/10	Queens Road Shops, Areley Kings	M	22	0.37	N
AKR/1	Pearl Lane, Areley Kings	H	250	15.09	N
AKR/4	Yew Tree Walk	H	85	3.73	Y
AKR/20	Carpets of Worth	M	110	3.3	N
LI/11	Land west of former school site	H	200	9.52	Y

Page 243-4 remove policy 33.6 Yew Tree Walk and associated reasoned justification (see separate report for justification for site removal)

Land at Yew Tree Walk AKR/18 (3.73Ha)

~~**33.10** This area of land to the rear of the Stagborough Way estate was used to tip waste from the former power station. It is on a raised plateau with steeply wooded slopes to the River Severn floodplain below. The Moorhall Nature Reserve is located immediately to the south east. It is currently in the Green Belt.~~

Policy 33.6 Yew Tree Walk AKR/18

~~This site is to be removed from the Green Belt and allocated for residential development.~~

- ~~1. Access to be taken from Yew Tree Walk~~
- ~~2. Landfill site will require capping and dwellings will need to be piled~~
- ~~3. Site run-off cannot be via infiltration due to previous land use. A wetland feature could be created on land to the south adjacent to existing woodland. This habitat creation could help to compensate for losses due to development~~
- ~~4. A full bat assessment and reptile survey will be required to inform the developable area and site layout~~
- ~~5. Wide buffers to the woodland edges will be required to discourage public access and to maintain dark, undisturbed corridors for wildlife~~
- ~~6. A substantial buffer is required along the southern edge of the development to protect flora and fauna from light spillage. Area furthest from woodland edge would be suitable for public open space~~
- ~~7. Areas of hussocky grassland should be retained on the site to support species such as badgers, hedgehogs, bats and reptiles as this is their natural hunting ground~~
- ~~8. Rear gardens should be made permeable to wildlife, especially hedgehogs, to maintain the site's function as a green corridor~~
- ~~9. A funded woodland management plan should be approved as part of any application~~
- ~~10. Proposals should take into consideration the Kidderminster and Stourport Urban and Waterfront Strategic Development Corridor Green Infrastructure Concept Statement~~
- ~~11. A network of pedestrian routes should be integrated throughout the development to encourage active travel~~

Reasoned Justification

33.11 ~~This site was previously subject to sand and gravel extraction in the 1950s before it was infilled with ash waste material from the power station. Although currently in the Green Belt, the site plays a limited role in fulfilling the Green Belt purposes. The site must be designed to integrate well with the neighbouring development and take care with massing and building heights so as not to dominate views across the valley~~

Page 254 – additional text

Minster Road Outdoor Sports Area

33.39 The Council will continue to safeguard an area shown on the Policies Map north-west of Minster Road, Stourport-on-Severn for outdoor sports use. **This area is washed over Green Belt and has an important function in terms of sports facilities as well as preventing Kidderminster and Stouport-on-Severn from merging together.**

Policy **33.21** Minster Road Outdoor Sports Area

1 Proposals for the development of outdoor sports facilities will be encouraged within this area subject to compatibility with Green Belt and landscape policies.

2 **Proposals will be delivered via developer contributions and other funding sources in accordance with the Playing Pitch Strategy and Built Sports Facilities Strategy.**

Reasoned Justification

Approximately 75 hectares of Green Belt land between Kidderminster and Stourport-on-Severn will be safeguarded for outdoor sports and recreation. Until 2016, much of the site was in use as a golf course. The site returned to local authority ownership in June 2018. The Wyre Forest Golf Facility Review (2019) sets out why this course is considered to be surplus to requirements. Parts of the site have now been brought under management by the Council's ranger service to be managed as a nature reserve as part of a long term vision to create a Country Park. This part of the site will be managed as an extension to the adjacent Burlish Top Nature Reserve. The land has been made available for public access with footpaths, signage, gates and fencing. Cattle have also been brought to graze the wildflower meadow. A proposal to develop a 3.24km cycling route on land to the south of Kingsway is also being discussed with British Cycling. Any funding secured would be match funded from S106 contributions. There are also plans to create a new area of woodland on 10 ha in conjunction with the Woodland Trust. A visitor car park will be provided adjacent to the Kingsway. Existing sports facilities include a number of football pitches adjacent to Minster Road and the extensive facilities at Stourport Sports Club including netball courts (some under cover) hockey pitches, cycling track and athletics tracks.

11. Amendments to Chapter 36 – Rural Wyre Forest

Amendments to wording are shown in **bold text and underlined**.

Policy 36 Villages and Rural Areas Site Allocations table amended to add in new site

Site Ref	Site description	Proposed Use	Indicative no. dwellings / employment land (Ha)	Gross Site Area (Ha)	Removed from Green Belt ?
<u>WFR/CB/3</u>	<u>Land off Station Drive, Blakedown</u>	<u>CP/H</u>	<u>50</u>	<u>2.74</u>	<u>Y</u>

Page 268

Reasoned Justification to Policy 36.6 Station Yard Blakedown WFR/CB/2 – additional wording

36.10 This small site is unsuitable for residential use. Its location adjacent to Blakedown Station makes it an ideal site for station car parking. **The Worcestershire Rail Investment Strategy (2017) identifies Blakedown as one of 5 locations under consideration for additional car parking to address the current shortfall and provide capacity for passenger growth. Further details are included in the Transport Evidence paper and the Infrastructure Delivery Plan.**

Additional site policy

Land off Station Drive, Blakedown WFR/WC/CB/3 (2.74 Ha)

36.11 This land on the northern edge of Blakedown lies between the A456 and the railway line and is adjacent to Blakedown station. The site is proposed for a mix of station car parking and housing with direct pedestrian access to both the station platform and the adjacent bus stop.

Policy 36.6A Land off Station Drive, Blakedown WFR/CB/3

The parcel of land is removed from the Green Belt and allocated for a mix of station car parking and residential development.

1. Vehicular access to be taken from Station Drive

2. The plantation woodland alongside the railway line will be retained and enhanced with additional planting where required
3. Existing hedgerow along boundary with A456 to be retained and enhanced where required
4. Pedestrian access onto station platform and A456 adjacent to bus shelter to be incorporated into scheme design
5. Churchill and Blakedown Valleys Local Wildlife Site adjoining site to north will require buffering with embankment and woodland retained as open space. With potential for SuDs and creation of mosaic of semi-natural marshland and wet woodland.
6. Large oak tree adjacent to entrance on Station Drive must be protected with its canopy kept free of lighting
7. Station parking to be provided mainly in the form of a half basement podium deck located along western boundary of site
8. Potential adverse impacts on views from/of Harbrough Hall to be mitigated for by additional planting along eastern boundary where required
9. Housing to be provided in accordance with policies elsewhere in Local Plan and also to meet any local housing need shown in a Parish Housing Needs Survey.

Reasoned Justification

Development of this site would constitute a rounding off of the settlement of Blakedown and provide a strong and defensible Green Belt boundary using the stream, pools and woodland to the north and the A456 to the east. Blakedown is a well-served village and the site is in a highly sustainable location with easy access to local shops, primary school, sports facilities and regular train services into Hagley and Kidderminster for other services. This allocation will require an amendment to the settlement boundary with the land being removed from the Green Belt.

Additional car parking is needed at Blakedown railway station to meet the demand for car parking spaces for rail users on the commuter line to the Black Country and Birmingham as evidenced in the SLC Rail document. Housing development on the site would help to cover the costs of the car parking and would also help towards meeting the future housing needs in Blakedown village.

12. Amendments to Chapter 37 – Monitoring and Implementation Framework

Page 271 updated trajectory to reflect position at April 2019 **to be presented to LPRP members at 1st July 2019 meeting.**

13. Appendix – Policies Maps

12.1 The Policies Maps have been updated to reflect the changes made. The updated Policies Maps can be viewed in the attached appendices.

Wyre Forest District Local Plan Pre-Submission Publication

Consultation Plan – September 2019

1.0 Background

- 1.1 It is a cornerstone of the planning system that communities and stakeholders should be able to influence the matters addressed in planning policy. The National Planning Policy Framework (NPPF) published in July 2018 reinforces the importance of community involvement in paragraph 15: *“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”* In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Wyre Forest District Local Plan Pre-Submission Publication document has been published to allow representations to be made before it is submitted to the Secretary of State. The consultation on the Local Plan Pre-Submission Publication document (known as the Publication document) is being re-opened for further representations to be made and will run from 2nd September to 14th October 2019. All representations received will be submitted with the draft Local Plan to the Secretary of State for examination in public. (Note that all the consultation responses previously received by the Council during the Pre-Submission consultation held last year in Autumn/Winter 2018 will also be submitted to the Planning Inspector).
- 1.2 At this publication stage, the full Sustainability Appraisal report is also available for consultation. This report includes a non-technical summary setting out the key stages in the Sustainability Appraisal process and the main findings.

2.0 What is the Local Plan Review?

- 2.1 The Pre-Submission Publication document is the latest stage in the preparation of the Wyre Forest Local Plan Review which sets out the long-term vision and strategic context for managing and accommodating growth within the district until 2036. The aim of the Local Plan is to set out:
- The areas where development will take place;
 - The areas that will be protected; and
 - Policies that will be used to determine planning applications.
- 2.2 Under the planning system most development needs planning permission. The principal basis for making those decisions is the development plan; the Local Plan once adopted will form the main part of it for Wyre Forest District, replacing the currently adopted Local Plan.

3.0 Adopted Statement of Community Involvement Requirements

- 3.1 The District Council first adopted its Statement of Community Involvement (SCI) in 2006. Following changes in legislation the SCI was updated, revised and adopted in February 2013. The SCI sets out the Council’s policy for involving the community in the planning process. It also details how the Council intends to involve all sections of the community and provides guidelines and minimum

standards to involve the community, interest groups and stakeholders in the production of Local Development Documents. The statement provides guidance on:

- How people will have the chance to make representations on the draft Local Plan, and the process for considering and responding to their views.
- The Examination in Public.
- How the District Council will keep the community informed on progress and outcomes.

3.2 The Statement of Community Involvement (2013) can be viewed on the Council's website here:

<http://www.wyreforestdc.gov.uk/planning-and-buildings/planning-policy/statement-of-community-involvement.aspx>

4.0 The Duty to Cooperate

4.1 The duty to cooperate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils in England and public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters.

4.2 In order to fulfil the requirements of the Duty to Cooperate, all neighbouring authorities and consultation bodies covered by the Duty to Cooperate will receive a consultation form to complete which will allow any concerns to be raised. This will provide an audit trail to demonstrate that the Duty has been fully considered and complied with. Where cross-boundary issues are identified, officers will offer to meet with each of the neighbouring authorities or organisations concerned to discuss the issues and how the Plan can best address them. In line with NPPF requirements, Statements of Common Ground will be prepared where necessary.

5.0 Targeting Consultation and Methods

5.1 The District Council will actively seek to engage all community groups within the Wyre Forest District. Local planning authorities are required to consult specific bodies which they consider may have an interest in the proposed Local Plan document and other consultation bodies which it considers are appropriate. A list of the specific consultees for Wyre Forest District is set out in Appendix A to this document.

5.2 It is proposed to consult in a variety of ways. Examples include drop-in sessions in Kidderminster, Stourport-on-Severn, and Blakedown, mini poster displays in a wide range of accessible locations throughout Wyre Forest District, a press release to be circulated to the local newspapers and radio

stations as well as a leaflet distribution to householders within the District. All Town and Parish Councils will be sent a consultation notice and be asked to display it on their notice boards.

6.0 Involving Harder-to-reach Groups

6.1 Within the District there are groups which are hard to reach through consultations. The District Council recognises that these groups in particular may have different levels of access to information and therefore may find it harder to get involved in the decision making process. In particular, the District Council will employ the following methods for engaging hard to reach groups: leaflet distribution to households within Wyre Forest District, drop-in sessions at public locations (detailed at 7.2).

7.0 Drop-in Sessions

7.1 During the six week public consultation on the Local Plan Pre-Submission Publication a number of drop-in sessions will be held. These will be staffed at highly accessible public locations in the main towns of Kidderminster and Stourport-on-Severn. There will also be a drop-in session held in Blakedown. Display boards will be erected at the drop-in sessions and copies of the Pre-Submission Publication document will be made available for public viewing along with other materials, such as evidence base documents. Staff will also be on hand to answer any queries raised by the public.

7.2 Location of Drop-in Sessions

Date	Time	Venue
Wednesday 11 th September 2019	3pm to 6pm	Blakedown Parish Rooms 18 Belbroughton Road Blakedown DY10 3JG
Wednesday 18 th September 2019	3pm to 7pm	Corn Exchange Kidderminster Town Hall DY10 1BD
Saturday 28 th September 2019	10am to 1pm	Stourport Civic Hall DY13 8UJ

7.3 Poster Displays

Posters will be displayed at the following locations throughout the duration of the Local Plan Pre-Submission Publication consultation:

- Kidderminster Library
- Stourport Library

- Bewdley Library

KIDDERMINSTER

- Wyre Forest Town Hall
- Wyre Forest Leisure Centre
- Tesco Superstores
- Sainsburys
- Morrisons
- Asda
- Iceland
- Hodge Hill Garden Nurseries
- Barnetts Hill Garden Centre

STOURPORT

- Stourport Civic Hall
- Tesco
- Co-op
- Lidl
- Cooks Garden Centre

BEWDLEY

- Bewdley Museum
- Bewdley Leisure Centre
- Co-op
- Tesco

RURAL AREAS

- Wyre Forest Discovery Centre
- Cookley – Tesco and/or Post Office
- Blakedown Post Office
- Chaddesley Corbett Post Office
- Wolverley Stores

- Fairfield Shop
- Upper Arley Post Office
- Rowberry Farm Shop
- Far Forest Post Office/stores
- Colliers Farm Shop and/or Clows Top Post Office

8.0 Awareness raising – Media

- 8.1 To coincide with the launch of the consultation on the Local Plan Pre-Submission Publication press releases will be organised for the local newspapers, such as the Kidderminster Shuttle. A publicity leaflet will be delivered to households throughout the district. The leaflet will detail the dates and times of the drop-in sessions and details of places where the Pre-Submission Local Plan Publication document can be viewed/downloaded.

9.0 Publishing on the Web

- 9.1 An interactive version of the Pre-Submission Publication document will be made available to enable electronic representations to be made. The interactive consultation response form can be filled in via the On-line portal or downloaded and emailed to LPR@wyreforestdc.gov.uk. The Council strongly encourages responses to be submitted using the on-line response form via the Council's interactive consultation system. (See section 10 below for full details on how to comment).
- 9.2 The evidence base documents will also be made available on the Council's website and copies will also be made available at the consultation drop-in sessions (see 7.2 for venues).
- 9.3 The District Council will also use social media (Twitter and Facebook) to promote the consultation period and the drop-in sessions.

10.0 How to Comment on the Local Plan Pre-Submission Publication document

- 10.1 The six week consultation of the Pre-Submission Publication will start on Monday 2nd September 2019 and will close promptly at 5pm Monday 14th October 2019. **No late responses will be accepted.**
- 10.2 The consultation response form follows a similar structure to the standard response form issued by the Planning Inspectorate. This is so consultation responses are set out in the way the Planning Inspector will consider comments at the public examination. The consultation response form will be

made available on the Council's website: www.wyreforestdc.gov.uk/localplanreview. **We will only accept responses submitted using the consultation response form.**

10.3 The Council strongly encourages responses to be submitted using the on-line response form via the District Council's interactive consultation system. Consultation responses will only be accepted if submitted in one of the following ways:

- Via the On-line portal
www.wyreforestdc.gov.uk/localplanreview
- By downloading the form from our website: www.wyreforestdc.gov.uk/localplanreview
- By collecting a hard copy from main reception at Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF or from the Customer Service Centre, Town Hall, Vicar Street, Kidderminster, DY10 1DB.
- Forms should be emailed to: LPR@wyreforestdc.gov.uk or posted back to Planning Policy Team, Wyre Forest DC, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF.

Please note that representations made at this stage in the process cannot remain anonymous, but details will only be used in relation to the Wyre Forest District Local Plan Review. Your response will be made available to view as part of the Examination process.

10.4 The purpose of the consultation is to allow interested parties to make representation on the soundness and legal compliance of the plan. The District Council's statement of representation procedure sets out the procedure for making representations to the plan.

10.5 The National Planning Policy Framework (NPPF) (para 35) states that to be sound a local plan must be:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

11.0 Formally Processing Comments – Procedures

- 11.1 All consultation response forms submitted to the District Council online, by email or post will be acknowledged within five working days of their receipt. After the Pre-Submission Publication consultation period ends, the Planning Policy Team will consider all of the consultation response forms received during the consultation period and may, as a result, update the Submission version of the Local Plan. A consultation summary report will also be produced detailing the key issues raised from the consultation response forms received. This will be presented to and considered by the Overview and Scrutiny Committee and Cabinet. The consultation summary report will be made available for public viewing on the Council's website at submission stage of the Local Plan.
- 11.2 The Council will then submit the Submission version of the Local Plan for examination by an independent Government appointed Planning Inspector. The Submission version will be approved by a meeting of the full Council which is expected to happen in February 2020. Consultation response forms received for this Local Plan Pre-Submission Publication document and the updated evidence base studies will be passed to the Planning Inspector. It should be noted that only those who make a representation seeking a change to the plan within the advertised publication consultation period will have the right to appear at the Examination.
- 11.3 The Council anticipates that an examination in public will be held on the Local Plan in Spring 2020 with adoption of the Local Plan taking place in late 2020. However, the timetable after submission is beyond the Council's control and will be in the hands of the Government appointed Planning Inspector.

Appendix A – List of Consultees

Specific Consultees

Wyre Forest District Parish/Town Councils

Bewdley Town Council
Broome Parish Council
Chaddesley Corbett Parish Council
Churchill and Blakedown Parish Council
Kidderminster Foreign Parish Council
Kidderminster Town Council
Rock Parish Council
Rushock Parish Council
Stone Parish Council
Stourport on Severn Town Council
Upper Arley Parish Council
Wolverley & Cookley Parish Council

Adjacent Parish Councils

Abberley Parish Council
Alveley and Romsley Parish Council
Astley & Dunley Parish Council
Bayton Parish Council
Belbroughton and Fairfield Parish Council
Clent Parish Council
Cleobury Mortimer Parish Council
Dodford with Grafton Parish Council
Elmbridge Parish Council
Elmley Lovett Parish Council
Hagley Parish Council
Hartlebury Parish Council
Highley Parish Council
Kinlet Parish Council
Kinver Parish Council
Lindridge Parish Council
Mamble Parish Council
Pensax Parish Council
Shrawley Parish Council
Upton Warren Parish Council

Other Specific Consultees

British Telecom
Birmingham City Council
Bromsgrove District Council
Dudley Metropolitan Borough Council
EE
Environment Agency
Greater Birmingham and Solihull Local Enterprise Partnership
Hereford & Worcester Ambulance Service
Hereford & Worcester Fire & Rescue Service

Appendix A – List of Consultees

Highways England
Historic England
Homes England
Malvern Hills District Council
National Grid
Natural England
Network Rail
NHS England
Office of Rail Regulation
Redditch Borough Council
Sandwell Council
Severn Trent Water
Shropshire Council
Solihull Council
South Staffordshire District Council
South Staffordshire Water Plc
Staffordshire County Council
Staffordshire Police Authority
The Coal Authority
Three
Vodafone and O2
Walsall Council
West Mercia Police
West Midlands Ambulance Service
Western Power Distribution
Wolverhampton City Council
Worcester City Council
Worcestershire County Council
Worcestershire Local Enterprise Partnership
Worcestershire Clinical Commissioning Groups
Worcestershire Regulatory Services
Wychavon District Council

General Consultees

Organisations and individuals registered in the Planning Policy database including:

Agents
Business and Commerce Groups
Conservation Interest Groups
Developers
Housing Interest Groups
Individuals
Interest / Pressure Groups
Land Owners
Local Interest Groups
Registered Providers

Appendix A – List of Consultees

Service Providers

Hard to Reach Groups

Age UK Wyre Forest

Derbyshire Gypsy Liaison Group

Friends Families and Travellers

National Federation of Gypsy Liaison Groups

Offmore Comberton Action Group

The Showman's Guild of Great Britain Midland Section

WYRE FOREST DISTRICT COUNCIL
FEEDBACK FROM CABINET MEETING HELD ON
WEDNESDAY 19TH JUNE 2019

**Agenda
Item No.**

Decision

7.1

**Wyre Forest District Local Plan Review: Revised Local
Development Scheme (Project Plan 2019 – 21)**

Decision:

**In line with the recommendations from the Overview and
Scrutiny Committee from its meeting on 13th June 2019:**

**The proposed revised Local Development Scheme Project Plan
2019 – 2021 as set out in Appendix 1 of the report, be adopted.**

Overview & Scrutiny Committee Work Programme 2019-2020

June 2019

“How are we doing?” Q4 update

Wyre Forest District Local Plan: Revised Local Development Scheme (Project Plan 2019-21)

Tracking Recommendations 2018-2019

July 2019

Treasury Management Review Panel – request for nominations

Wyre Forest District Local Plan: Pre-Submission Publication

Asset Management Strategy

EXEMPT Disposal of Land in Stourport

September 2019

“How are we doing?” Q1 update (Enabling)

Treasury Management Strategy Statement and Annual Investment Strategy

Backward Look 2018/19

A North Worcestershire Economic Strategy

Homelessness Strategy

November 2019

“How are we doing?” Q2 update (Business and People)

Treasury Management Strategy Statement and Annual Investment Strategy Mid Year Report 2019/20

Effectiveness of PACT Action Plan

February 2020

“How are we doing?” Q3 update (Place)

Treasury Management Strategy Statement and Annual Investment Strategy 2020-21

Annual review of the North Worcestershire Community Safety Partnership 2019/20

2020-2021 Municipal Year

June 2020

“How are we doing?” Q4 update (Housing and Planning)



Overview & Scrutiny Committee

Briefing Paper with some exempt appendices

Report of: Mike Parker

Date: Thursday 4th July 2019

Asset Management Strategy

1. Summary

- 1.1 The purpose of this report is to set out a proposal to agree the adoption of an Asset Management Strategy, as part of the Capital Strategy, to guide the Council in the overall management of assets within its developing portfolio of assets acquired through the Capital Portfolio Fund.

2. Background

- 2.1 As part of its medium term financial strategy, the Council has agreed a proposal to use its prudential borrowing capability to create a new Capital Portfolio Fund of up to a maximum of £25m. The Council adopted a strategy to support the expenditure from the fund at its Cabinet meeting in June 2017 and in March 2018 refreshed its Capital Portfolio Fund Strategy as part of its Capital Strategy 2018-21. The latest Capital Strategy for 2019-22 was agreed at February 2019 Council.
- 2.2 To date the Council has completed six acquisitions through the Capital Portfolio Fund. The total spend and commitments from the £25m Capital Portfolio Fund approval is currently c£17.6m.
- 2.3 The Council recognises that it has a responsibility to ensure that the newly acquired assets are properly managed on a day to day basis, but also that the Council has an agreed strategy for the overall maintenance of the portfolio of assets to ensure that their capital and revenue values are maximized to ensure the full benefit of owning them is realised by the Council.
- 2.4 In order to assist the Council and to build capacity and experience consultants have been appointed to manage both the properties and the portfolio. The Council is in the process of appointing BNP Paribas to manage the properties on a day to day basis, having successfully undertaken an open tender process and similarly the Council has appointed Jones Valerio to support the overall management of the portfolio of assets and it is this latter function that this paper and the Asset Management Strategy refers to.
- 2.5 Both sets of consultants will work alongside each other as there is a crossover between their roles; Jones Valerio will need to ensure that BNP Paribas are maintaining the assets and supporting the needs of tenants to ensure that each asset is well maintained and maximising its capital and revenue potential.

- 2.6 The draft of the strategy will be presented to the meeting of Overview and Scrutiny Committee on 4th July and their recommendation reported to this meeting.

3. Key Issues

- 3.1 The Council's Capital Portfolio Fund Strategy sets out the guidelines it uses when considering making a new acquisition; the proposed Asset Management Strategy (Appendix 1) sits alongside that Strategy as part of the Council Capital Strategy to determine how the Council will manage the assets once acquired to ensure that their revenue and capital values are maintained and grown, the overall aim being to grow the value of the initial £25m investment. It should be noted that some of the appendices to the Strategy are exempt documents as they contain bespoke commercially sensitive documents that are the intellectual property of Jones Valerio.
- 3.2 The Capital Portfolio Strategy makes clear the Council's purposes behind using these funds to support the economic growth of the district and it is important that the Asset Management Strategy is also clear about the Council's aims; Part 1 of the Strategy sets out the Council's economic aims of the portfolio and recognizes the government guidance within which the Council operates.
- 3.3 The Ministry for Housing, Communities and Local Government (MHCLG) issued new statutory Guidance on Local Government Investments in early February 2018. The Asset Management Strategy has been developed to accord with the Government's advice.
- 3.4 The Asset Management Strategy is structured around each of the acquired assets having an individual Strategic Asset Level Business Plan (SALBP). This will enable the Council to oversee the individual assets and at a glance determine their 'live' status in terms of planned activity and performance. All decisions made by the Council on each asset are transparently made using the Procedure Guidance and Client Approval process which gives a clear audit of decisions made regarding each asset. In turn the collective SALBPs then forms the overall Asset Management Strategy where the Council will be able to monitor performance against the strategic objectives of growing capital and revenue value as well as taking holistic decisions about the overall balance of the portfolio in terms of asset sector, location, lot size etc and to form a view about relative performance against agreed KPIs and local and regional market benchmarks.
- 3.5 Performance reporting is a key tenet of the Strategy and Part 9 sets out the manner in which regular reporting will take place to ensure the Council is always up to date with the performance of individual assets as well as the overall performance of the portfolio.
- 3.6 Part 10 of the Strategy sets out the Key Performance Indicators (KPI) against which the performance of the portfolio will be judged.

4. Financial Implications

- 4.1. As part of its medium term financial strategy, the Council has agreed a proposal to use its prudential borrowing capability to create a new Capital Portfolio Fund of up to a maximum of £25m. The Council adopted a strategy to support the

expenditure from the fund at its Cabinet meeting in June 2017 and in March 2018 refreshed its Capital Portfolio Fund Strategy as part of its Capital Strategy 2018-21. The latest Capital Strategy for 2019-22 was agreed at February 2019 Council.

- 4.2. The adoption of this Asset Management Strategy will ensure the Council monitors the performance of the individual assets acquired as well as the overall portfolio of assets to maximise the capital values and revenue returns of the acquisitions and in so doing it will enable the Council to make key decisions regarding the assets such as whether to retain or dispose of them.
- 4.3. The costs associated with appointing consultants to advise on the day to day management of the assets are met primarily through the service charge paid by tenants and otherwise from the revenue returns from the assets. The fees for the appointment of Jones Valerio is determined as a percentage of the overall value of the portfolio.

5. Legal and Policy Implications

- 5.1 The Capital Strategy was agreed by Cabinet in March 2018 to ensure the Council has due regard to the MHCLG Guidance and this includes an updated Capital Portfolio Fund Strategy; this was agreed by Council at the May 2018 meeting. The strategy is revised annually together with the Capital programme and presented alongside the MTFS for member consideration. The revised 2019-22 Capital Strategy was agreed by Cabinet on 18th December 2018 and Council on 27th February 2019.
is made.

6. Quality Impact Needs Assessment

- 6.1 An Equalities Impact Assessment is not required.

7. Risk Management

- 7.1 Without the Asset Management Strategy to complement the Capital Portfolio Fund Strategy the Council would not be able to meet the MHCLG statutory guidelines, nor maintain proper governance over the development of its assets or the overall performance of the portfolio.

8. Conclusion

- 8.1 The Council is successfully developing a portfolio of assets acquired using its Capital Portfolio Fund to support its continued delivery of a growing local economy; adopting the proposed Asset Management Strategy ensures that the Council will be able to monitor the performance of the individual assets and collectively the whole portfolio to ensure that it delivers capital and revenue growth.

9. Options

9.1 The Overview and Scrutiny Committee is invited to consider this report and:

1. Recommend to Cabinet that the proposed strategy should be adopted; or
2. Make any other recommendation to Cabinet which the Committee agrees.

10. Open and Exempt Appendices

Appendix 1 – Asset Management Strategy

Appendix 2 – Appendices to the Asset Management Strategy (Exempt)

11. Background Papers

Capital Strategy 2019-22

Capital Portfolio Fund Strategy

Officer Contact Details:

Name: Mike Parker

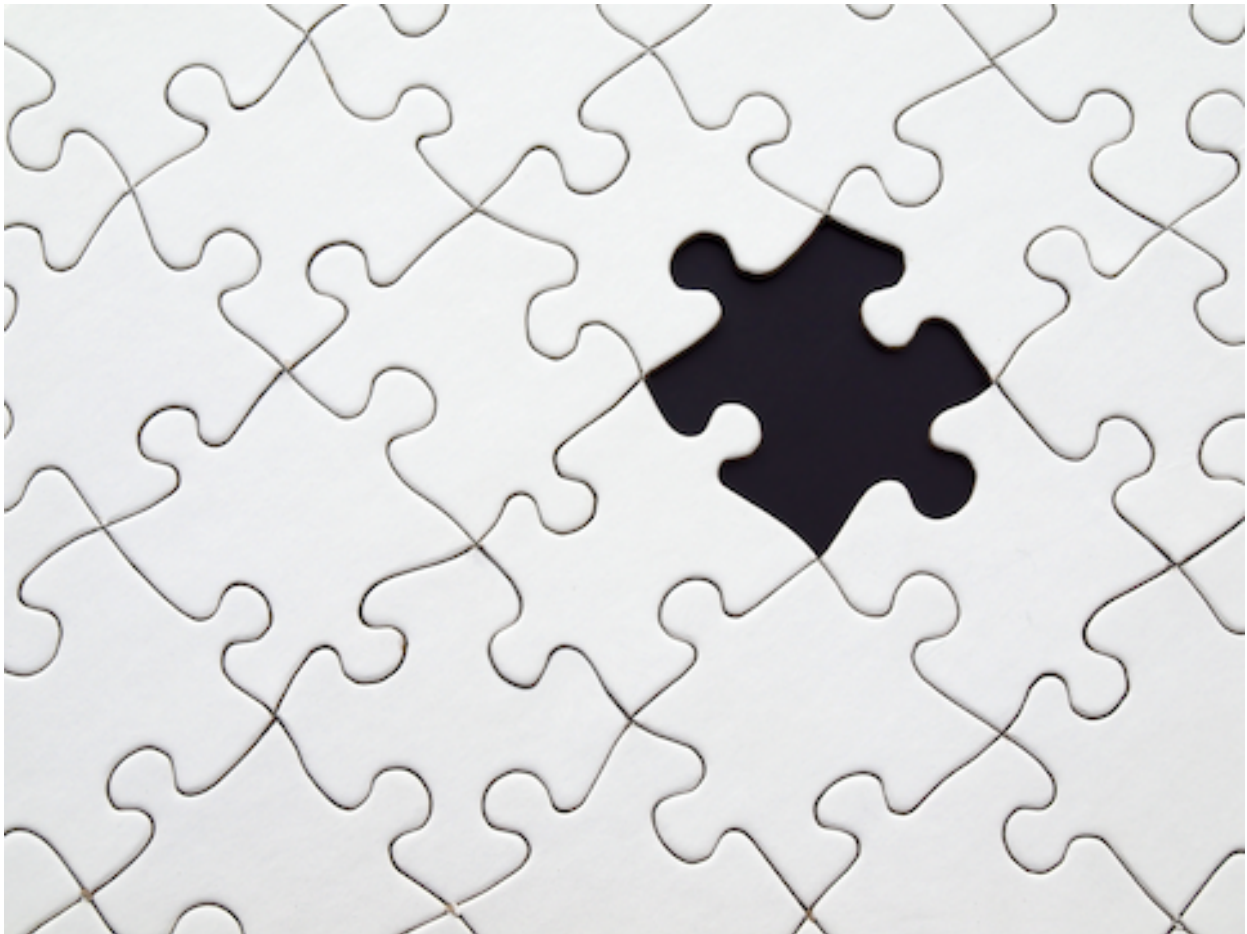
Title: Corporate Director: Economic Prosperity & Place

Contact Number: 01562 732500



Wyre Forest District Council

Capital Portfolio Fund



Asset Management Strategy

JONES VALERIO

INVESTMENT MANAGEMENT

26th June 2019

Executive Summary

The Council's Capital Strategy is in line with Government Guidance on Local Government Investments (3rd Edition) issued under section 15(1)(a) of the Local Government Act 2003 and is effective for financial years commencing on or after 1st April 2018.

The Asset Management Strategy (AMS) is to be adopted by the Council to meet its key goals of creating a balanced property portfolio to derive long term economic and regeneration benefits for the district whilst simultaneously providing sustainable net revenue income streams.

This AMS is necessary for the Council to articulate both the decisions made about the goals of the Capital Portfolio Fund (the Portfolio) and the ways in which the Council and the Asset Manager (AM) will achieve those goals.

It is intended to guide the Council in their decision-making moving forward and has been prepared by Jones Valerio Ltd (the AM) who were appointed on the 24th April 2019 to act for Wyre Forest District Council (the Council) and its Members.

The document sets out the strategy for property acquisitions and the ongoing ownership, asset management and decision making processes of those assets acquired within the Portfolio.

The AMS will be reviewed and commented upon each quarter by the AM as part of the Quarterly Fund Reporting (QFR) and in addition will be reviewed and updated annually as part of the contract.

For the purposes of this report, whilst the two do not work in isolation, the AMS is explained as an Acquisition Strategy and an Asset Management Strategy separately to aid understanding and linkage.

For acquisitions made prior to the appointment of the AM, each property asset will be fully appraised via the Asset Management Strategy, including Strategic Asset Level Business Plans (SALBP) and included in the QFR and KPI's.

Where relevant the Acquisition Strategy in the QFR will highlight property assets as suitable for potential disposal for the benefit of the overall Portfolio performance, with funds from asset sales to be recycled into new property purchases.

Team and Resources

Asset Management

To achieve the key AMS goals the Council has appointed an external asset management advisor, Jones Valerio Ltd (the AM).

The AM is appointed to provide Asset Purchase and Sale Advice, and an Asset Portfolio Management Service. The AM will recommend further professional advisor engagement based upon the Portfolio activity requirement.

The AM is responsible for developing, reviewing and renewing the AMS, advising on acquisitions and disposals to build a balanced portfolio, implementing the SALBPs and reporting to the Council via a QFR to responsible Council Officers with bi-annual reports to the Overview and Scrutiny Committee and Cabinet.

Property Management

The Council has also appointed BNP Paribas (the Property Manager) to undertake the day-to-day activities of each asset, to include for example those matters relating to property operations such as collection of rent or service charge administration.

The AM will interact with the Property Manager primarily in relation to property management activity, who as AMs are responsible for strategic advice relating to the Council's Portfolio, including the individual tenant agreements and vacant property.

Monitoring Performance

Identification and familiarity with the various roles, responsibilities and resources is a key aspect of enabling the advisors to the Portfolio to work well together.

The AM will monitor and report on the performance of advisors to the Portfolio, including the Property Manager, to ensure that all actions and activities undertaken are conducted effectively.

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Economic Agenda

- 1.1 As part of the Council's Medium Term Financial Strategy 2017-2020 the Council has established a Capital Portfolio Fund (the Portfolio), initially of £25m sourced through borrowing from Public Works Loan Board (PWLb), to acquire assets that support its priority for regeneration and economic growth whilst also providing additional net income streams.
- 1.2 In 2016 the Council adopted a new Strategic Asset Management Plan (SAMP); of the stated objectives of the SAMP for the next 5 years, one is "to support business growth and economic development," which it is envisaged would include housing developments and another is to "maximise revenue potential from non-operational assets". The Portfolio is a key vehicle to deliver these objectives.
- 1.3 As part of the North Worcestershire group of authorities the Council is also a member of two Local Enterprise Partnerships (Worcestershire and Greater Birmingham & Solihull).
- 1.4 The Council is an active LEP member and has successfully attracted funding from both, through the Local Growth Fund for key regeneration projects; as such the Council has a vested interest in the successful growth of the LEP areas where it has a functional economic geography and supports the delivery of their respective Strategic Economic Plans (SEP) as this will benefit the district as a whole.
- 1.5 The Council has therefore decided that it will consider the acquisitions of its Portfolio across this combined LEP geography.

Government Guidance

- 1.6 Statutory guidance issued by the Secretary of State under section 15 (1)(a) of the Local Government Act 2003, requires that local authorities are required to *“have regard”* to *“such guidance as the Secretary of State may issue”*.
- 1.7 The Council will continue to ensure the prudent management of its acquisitions and to ensure they meet its strategic economic ambitions and having regard to security and liquidity of capital in accordance with the Government guidance.
- 1.8 The Council will ensure procedures are in place for monitoring, assessing and mitigating the risk of loss of invested sums.
- 1.9 Effective management and control of risk are prime objectives of the policies and procedures.
- 1.10 It should be noted that further power is conferred upon an authority by the Localism Act 2011 (the 2011 Act). Section 1 of the 2011 Act introduced a new General Power of Competence. Under the provision, a local authority has the power to do anything that individuals generally of full legal capacity may do. The Act is widely drawn and includes references to commercial activities and does not have to be of benefit to the local authority's area.
- 1.11 The Localism Act requires that any Council's actions being done for a *“commercial purpose”* must be done *“through a company”*, principally being a company within the meaning of s.1 (1) Companies Act 2006.
- 1.12 Reporting against the prudential indicators included within the Capital Strategy will be included in the monitoring reports to Overview and Scrutiny and Cabinet in accordance with Code Guidance.

Purpose

- 2.1 Setting and achieving goals is the hallmark of a successful strategy and the overarching strategy for any traditional real estate investor is to reduce security and liquidity risk, and to increase capital value and revenue streams.
- 2.2 For the Council, there is a specific fundamental element incorporated into the strategy which is to achieve operational economic benefits whilst also providing a net revenue income stream.

The Strategic Goals

- 2.3 The key strategic goals (or objectives) identified are as follows:

- * Prioritise property acquisitions which support business growth and the delivery of various economic development objectives.

- * To acquire properties that provide a contribution to the ongoing financial sustainability of the Council by generating net income streams in accordance with the Council's corporate and financial objectives.

- * Prioritise property acquisitions that yield optimal rental growth and stable income within an acceptable risk range and meeting all due diligence requirements.

- * Maximise return whilst minimising risk through effective asset management initiatives as outlined in this strategy.

- * Protect capital invested in acquired properties.

- * Build a balanced property portfolio that is proportionate to the overall financial position of the Council and balances the risk of the Portfolio across sector, geography and asset value.

- * Identify potential disposals that will help deliver economic benefit with proceeds from sale to be recycled into further property acquisitions subject to appropriate Capital Programme approvals.

Purpose

- 3.1 The purpose of The Strategic Model as displayed in Appendix 11.1 and shown on the following page as a flowchart, ensures that the Analysis, Strategy, Planning, Delivery and Reporting Phases are all considered in the AMS and also acts as a guide through the various parts of this document.

Client Consultation and Property Market Analysis

- 3.2 Within the Analysis Phase it is necessary to carry out initial and regular Client Consultation to establish where any changes to strategy may be required in addition to property market information and analysis as further explained in Part 4.

Asset Management Strategy

- 3.3 The Strategy Phase is covered by the AMS and is further explained in Part 5 and Part 6 respectively along with the various portfolio activities identified in The Strategic Model.

Strategic Asset Level Business Plans

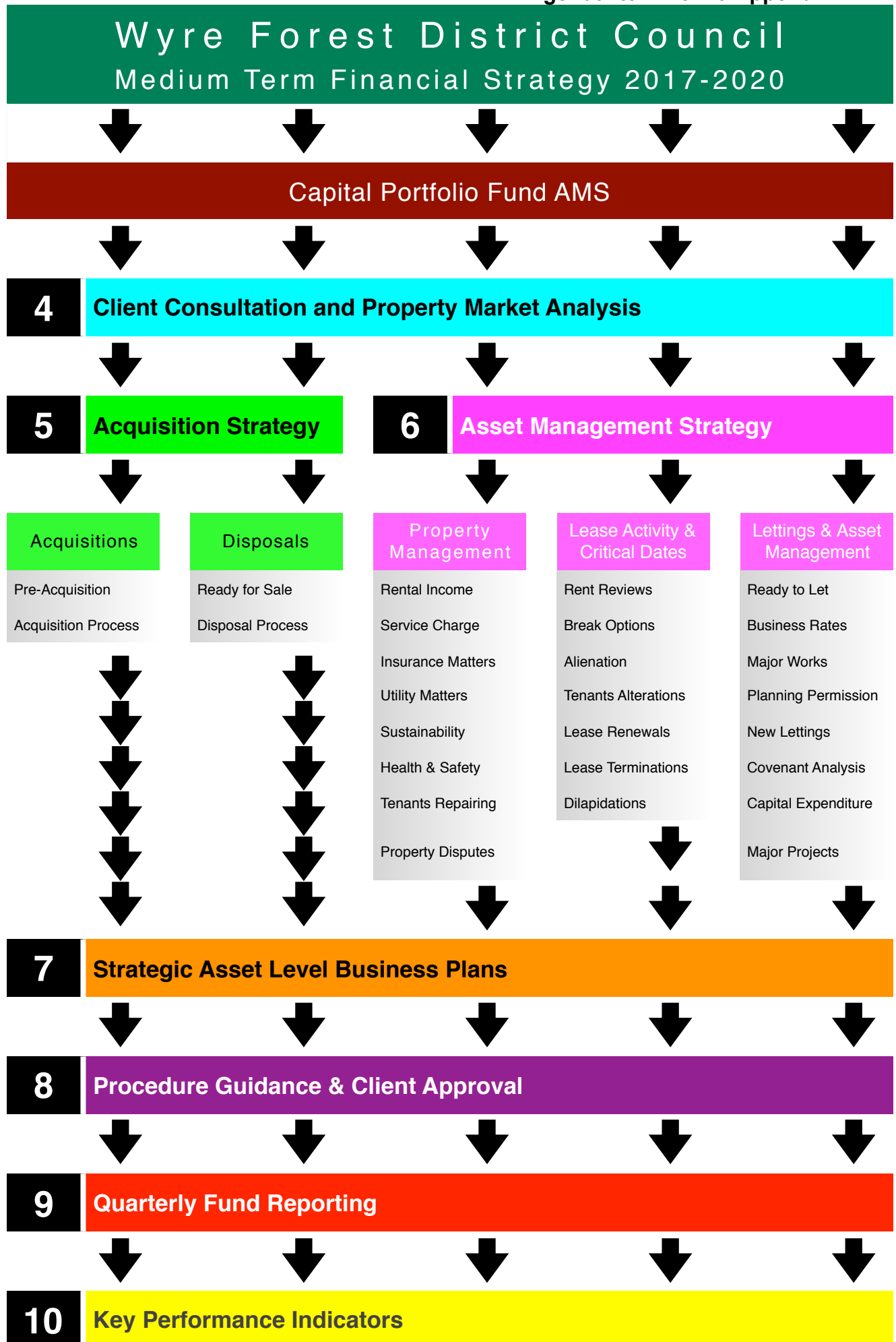
- 3.4 The Planning Phase of The Strategic Model focuses on the production of working asset level plans to deliver the portfolio goals and drive performance. SALBPs are produced for individual assets as further explained in Part 7.

Procedure Guidance & Client Approval

- 3.5 Delivery Phase of The Strategic Model is essential for the goals to be successfully achieved. The chosen method for this within the strategy is a Procedure Guidance document which is further explained in Part 8.

Quarterly Fund Reporting & Key Performance Indicators

- 3.6 The Reporting Phase of The Strategic Model and the inclusion of KPI's is explained in Parts 9 and 10 respectively.



Client Consultation

- 4.1 The Strategic Model requires a full understanding of the Council's needs to ensure that the AMS is fit for purpose and aligned to achieve the Council's goals.
- 4.2 To ensure the adopted AMS remains fit for purpose it must be regularly reviewed which is achieved by regular Client consultation to identify any risks and opportunities that may impact on the performance of the Portfolio so that action and changes to strategy, can be implemented.
- 4.3 This is achieved by regular dialogue and communication with the Council and is also commented on and reported at Portfolio level in the QFR.
- 4.4 At least once per year, the AM will arrange a full review of all aspects of the AMS and the Council's Capital Portfolio Strategy, with the respective SALBPs which sit beneath it, being reviewed and updated quarterly.

Property Market

- 4.5 Investment and occupational market research is a very important factor as it influences the decision making processes and is therefore reported in the Quarterly Fund Report.
- 4.6 The AM will resource property market research from a variety of different and reliable sources so a balanced view can be arrived at.
- 4.7 Most of the larger nationally represented commercial property agents produce regular market updates, insights and commentary, produced by their own in-house research teams. Their reports provide a rich and relevant commentary which the AM will analyse, interpret and report in the QFR.
- 4.8 The AM will also hold regular meetings with agents to identify and understand market developments and industry changes. The agents will be operating and/or specialising in the sectors and geographical areas of interest to the Council's portfolio.

Benchmarking and Outlook

- 4.9** The QFR includes an initial strategic section on the investment and occupational market characteristics and projections.
- 4.10** The AM will rely on monthly property performance indices which track capital value and rental growth statistics for retail, office and industrial sectors to benchmark the performance of the Portfolio. This information will come from monthly index data reported by the larger nationally represented commercial property agencies shortly after the end of each month.
- 4.11** Property sector performance data, in combination with other market research and economic forecasts and data, is utilised to make alignments to the Portfolio to achieve a balanced portfolio and also to measure and benchmark performance.
- 4.12** Benchmarking and outlook will influence the treatment of assets within the Portfolio, and in conjunction with the SALBPs will help determine which assets should be considered for disposal, and which asset types should be identified as suitable replacements into the Portfolio to achieve the goals.

Introduction

- 5.1 The Asset Management Strategy (AMS) comprises two parts, which are explained as an Acquisition Strategy and Asset Management Strategy separately to aid understanding and linkage. This section 5 covers the Acquisition Strategy. The Asset Management Strategy is covered in section 6.
- 5.2 The Strategic Model requires a full understanding of the Council's acquisition needs to ensure that the AMS is fit for purpose and aligned to achieve the Council's goals and to do this the AM will ensure there is alignment between the Capital Portfolio Fund Strategy, which sets out the parameters for acquisitions to be made, and the AMS.
- 5.3 The Acquisition Strategy does not work in isolation from the Asset Management Strategy. For example each potential acquisition and disposal will need to be appraised via the Asset Management Strategy as to its potential impact on the overall performance of the Portfolio.

Portfolio Valuers

- 5.4 An independent valuer (the Portfolio Valuer) will be appointed to value the assets within the Portfolio on an annual basis.
- 5.5 The AM will provide the Portfolio Valuer with all the necessary data for the valuations to be undertaken, and will update the Portfolio Valuer when changes occur so that these can be reflected in the valuation data quarterly for the QFR.
- 5.6 Portfolio valuation is necessary to identify the overall performance of the Portfolio and individual assets, so that shifts in value (either upwards or downwards) can be identified on a quarterly basis via the QFR.
- 5.7 The Portfolio Valuers may also be required to assist the AM to model certain scenarios to understand the impact of the individual assets in the Portfolio to assist with acquisition and disposal justification and decision making.

- 5.8** The Portfolio Valuers will also be responsible for providing the AM with certain KPIs as set out in Part 10. These KPIs along with all other KPIs (including prudential indicators) will be reported by the AM within the QFRs.
- 5.9** The KPIs will enable the AM to benchmark the performance of the Portfolio, and to make recommendations accordingly.

The Outline Strategy

- 5.10** The Acquisition Strategy is a key component of the overall AMS.
- 5.11** The Acquisition Strategy is primarily focused on the Portfolio's purchases and disposals, employing a diligent acquisition and separate disposal process to ensure that new purchases and chosen disposals will support the strategic economic goals.
- 5.12** The AMS includes the AM establishing an outline SALBP prior to purchase, which enables portfolio impact to be assessed working in conjunction with the Asset Management Strategy.

Balanced Portfolio

- 5.13** An essential part of any strategic risk conscious property owner is to understand and incorporate diversification theory into their acquisition and asset management strategy. This includes balancing the Portfolio in terms of risk by considering sector balance, geographic balance and asset value variation.
- 5.14** To mitigate risks, it is imperative that the Portfolio's exposures are tracked and benchmarked against current and future market forecasts and economic changes.
- 5.15** In terms of potential acquisitions and disposals into and out of the Portfolio, the impact on the balance will be a constant factor. For example, market intelligence may be a leading indicator to dispose of assets from a particular sector to mitigate future risk. Both the tracking and advise on risk mitigation is included in the acquisition considerations and the QFR accordingly.

Sourcing Acquisitions

- 5.16** As part of the Asset Purchase and Asset Disposal Advice, and an Asset Management Service, the AM is responsible for sourcing all new acquisitions into the Portfolio.
- 5.17** Acquisition opportunities will be principally sourced from national and local investment advisors. The AM will approach investment agents directly, informing them of the live requirements on behalf of the Council's Portfolio.
- 5.18** The AM is required to maintain and provide an updated Acquisition Opportunities Schedule to the Council on a weekly basis to ensure market opportunities are identified to the Council.

Pre-Acquisitions

- 5.19** Alongside ensuring a strategic fit, the key considerations for acquiring asset includes the following items listed and explained further below;
- * Geography
 - * Location
 - * Property Sectors
 - * Security of Income
 - * Financial Covenant Strength
 - * Liquidity of Capital
 - * Financial Returns
 - * Impact on Portfolio
 - * Lease Length
 - * Property Fundamentals
 - * Macro and Micro Location

- * Rental Value and Reversionary Scope
- * Tenant Suitability
- * Ethical Considerations
- * Sustainability
- * Legal and Material Liabilities
- * Asset Management Initiatives
- * Management of the Property

Geography

- 5.20** The Council will prioritise acquisition opportunities within the district but will also retain the discretion to make acquisitions outside the district within the geography of the LEP areas where it is a member.
- 5.21** Whilst it will always be the Council's preference to acquire assets within the district area to support regeneration and local economic development, the Council recognises that it has an interest in the success of the LEPs of which the district council is a member and that acquiring assets across this wider geography can have direct and indirect economic benefits for the district and its residents.
- 5.22** The Council has an interest in supporting the growth of the wider functional economic geography of the LEP areas on the basis that it will benefit locally from the wider City-Region success.
- 5.23** To that end therefore the Council may consider acquisitions that support this wider economic benefit covering Worcestershire, Birmingham, Solihull, Cannock, Lichfield, Tamworth and East Staffordshire areas as these are included within the 2 LEPs' geography.

Location

- 5.24** All locations within the Geography will be considered, which will fall under different categories identified as major prime, micro prime, major secondary, micro secondary and tertiary.

- 5.25** Different locations are an important facet of a balanced portfolio to diversify locational risks and to assist with improving returns. These categories are explained further under Macro and Micro Location.

Property Sectors

- 5.26** Acquisitions will not be limited to any particular sector, as flexibility to react to market change is key to being able to deliver the envisaged returns and a balanced portfolio.

- 5.27** The current Capital Portfolio Fund Strategy is to shape the Portfolio towards the following sectors :

- * Office (in town centre and out of town business park locations)
- * Industrial/Warehouse (on or within close proximity to major road/motorway infrastructure, or on established and/or modern industrial estates)
- * Leisure/Food & Beverage (town centre/local centre locations; out of town retail parks, or locations with main road prominence)
- * Mixed Use (town centre/local centre locations; or locations with main road prominence)
- * Residential

Security of Income

- 5.28** Security of income is an important factor in proportionality. For example, a small office suite, within a multi-let office building (representing a small percentage of the overall aggregate income of the property and let on a short lease) will present less risk to the Portfolio than that of a single let asset.
- 5.29** Tenants which are deemed to display strong financial strength will be favoured but consideration will be given to all financial covenant strengths in context with other fundamentals of the other acquisition criteria.
- 5.30** Guidelines on acceptable financial covenant of a tenant/s are described below.

Financial Covenant Strength

- 5.31** Predominantly those tenants demonstrating 3 years of pre-tax profit equal to or exceeding 3 times the annual rent or a net worth of 5 times annual rent, or 50% of income from tenants meeting this criteria in the case of multi let properties, will be favoured.
- 5.32** There may be instances where the property fundamentals and pricing are attractive enough to accept tenant covenants that do not meet this criteria.

Liquidity of Capital

- 5.33** The scope for realising capital, from the disposal of an asset, in the shortest time possible is of significant importance.
- 5.34** For example a property in poor condition, in a weak location, let to a strong covenant on a long lease places a disproportionate reliance on the financial covenant of the tenant and if it were to become vacant could prove difficult to re-let and sell.
- 5.35** To determine a property's capital liquidity the following features of the property should exist:
1. properties that are considered capable of being re-let in a short period of time if they were to become vacant;
 2. demonstrate strong prospects for renewal upon lease expiry/expiries;
 3. considered to be sensibly priced and not over-rented and therefore offer reversionary potential on renewal of lease/leases or upon new lettings;
 4. Significantly underpinned by its vacant possession value.

5.36 Financial Returns

Suitable property acquisition opportunities will be screened using the Council's adopted KPMG Financial Appraisal model. It calculates both a Net Present Value (NPV) and Internal Rate of Return (IRR) helping to identify acquisitions that produce a positive NPV and an IRR in excess of the cost of capital.

- 5.37** In addition to the KPMG Financial Appraisal model, other property appraisal methods may be necessary, to assess the underlying property's site value and vacant possession value (often referred to as 'residual value').
- 5.38** Based upon the Council's adopted financial modelling, it is envisaged that potential acquisitions that demonstrate a Net Initial Yield (NIY) below 6% may not meet the required returns, however some properties demonstrating a higher reversionary profile may still be viable if acquired off a lower initial yield (the 6% NIY should generally result in a minimum of a 1% Net Yield that is generally used as a threshold by the Council currently).
- 5.39** The Internal Rate of Return (IRR) and net impact on the Councils MTFS is also an important consideration.

Impact on Portfolio

- 5.40** All potential acquisitions will need to be assessed on their potential impact on the Portfolio.
- 5.41** For example a property may meet most of the required acquisition criteria but may expose the Portfolio to being overweight in a sector that is weakening, or may expose the Portfolio to high income void risks if lease expiries occur at the same time as a lease expiry on another asset within the Portfolio.

Lease Length

- 5.42** The Average Weighted Unexpired Lease Term (AWULT) is an important indicator of the projected future income of the portfolio. Traditionally longer leases are favoured by property investors ahead of shorter term leases.
- 5.43** For those acquisitions that demonstrate shorter AWULT, the properties must be considered capable of being re-let in a short period of time if they were to become vacant, and they should also demonstrate strong prospects for renewal upon lease expiry/expiries;
- 5.44** The impact of any potential acquisition on the overall Portfolio AWULT will also be considered as part of the Asset Management Strategy as it is reported as part of the QFR.

Property Fundamentals

- 5.45 Emphasis must be placed on properties which display the right property fundamentals.
- 5.46 Generally these will be properties that are modern and non-bespoke in nature with good accessibility. Older buildings with higher obsolescence factors may score poorly unless there is an underlying story, for example a potential for uplift in value achievable through redevelopment or refurbishment should the property become vacant.

Macro and Micro location

- 5.47 Generally, the relative importance of the macro location compared to the micro location increases as does the project and property size.
- 5.48 Secondary and tertiary locations describe properties that are generally in a less advantageous area to the macro and micro locations.
- 5.49 Consideration needs to be given to a property's location within the macro, micro, secondary and tertiary contexts.

Rental Value and Reversionary scope

- 5.50 The rental value of the property will need to be assessed to gauge the overall impact on the Portfolio. Generally properties which are over-rented should be avoided unless the purchase price reflects a suitable discount.
- 5.51 Properties which display reversionary potential. For example, properties which are considered to offer scope for the rent to be increased upon rent review, lease renewal or on a new lease following expiry will be favourable.

Tenant Suitability

- 5.52 The Council must take into account the type, nature and activity of tenant/s when considering an acquisition.
- 5.53 The Council has a responsibility to acquire prudently and conscientiously and must avoid acquisitions of properties where tenants may be deemed unfavourable for a variety of reasons.

Ethical Considerations

5.54

Business case proposals to acquire property will include the consideration of ethical issues and will exclude acquisitions in the following types of activity, as set out in the Capital Strategy: Violence, The Sex Industry, Gambling or betting, Material that may be regarded as offensive or discriminatory, Political Parties.

Legal and Material Liabilities

5.55

Thorough pre-acquisition and acquisition due diligence is necessary to determine legal and material risks that may affect the performance of a property and the performance of the Portfolio, so that these can be avoided or mitigated.

5.56

To identify and reduce legal and material risks the AM will follow certain procedures and checklists as set out in the Procedures Guidance (see Acquisitions section below).

Asset Management Initiatives

5.57

Asset management initiatives are primarily those initiatives that are identified by the AM that are designed to maintain or improve the value of an asset although there are a range of activities included in the SALBPs that identify opportunities to reduce risk that do not necessarily carry quantified impact.

5.58

In the pre-acquisition stage the AM will provide an outline SALBP which may highlight potential initiatives if not already identified by the vendor in their market approach and brochure.

Management of the Property

5.59

Properties will differ in the amount of management time and resources required to maintain and/or add value, and reduce exposure to risk.

5.60

For example, modern single let assets may have fewer lease events and activities, requiring less time and resource to manage compared to older multi-let assets with numerous lease events, common areas, and service charge activities.

- 5.61** Consideration will need to be given to the ease of management of certain assets in context to implementing effective asset management and time resources to other assets within the Portfolio.

The Evaluation Matrix

- 5.62** As an additional measure to the above Pre-Acquisition Criteria the AM and the Council will consider whether acquisition opportunities meet the AMS by applying a simple Evaluation Matrix as identified below.
- 5.63** This is a preliminary tool used to help initial assessment of acquisition suitability and should not be relied upon as a detailed appraisal of opportunities.
- 5.64** All opportunities will require the robust pre-acquisition procedures to be followed, meeting the Portfolio's Capital Portfolio Fund Strategy Criteria, Government Guidance and AMS, in addition to the KPMG Financial Viability Model.
- 5.65** The AM will score each acquisition proposal using the matrix; any opportunity will need to score a minimum of 250 to be considered acceptable as a potential acquisition.
- 5.66** Those opportunities scoring 250 and above will then be subject to further appraisal and due diligence, set out in the Pre-Acquisition and Acquisition stages.

		Excellent / Very Good	Good	Acceptable	Marginal	Poor
Weight						
Criteria		5	4	3	2	1
Location	20	Major Prime	Micro Prime	Major Secondary	Micro Secondary	Tertiary
Tenant Covenant	20	Single tenant with strong financial covenant	Single tenant with good financial covenant	Multiple tenants with strong financial covenants	Multiple tenants with good financial covenants	Tenants with poor financial covenant strength
Tenure	10	Freehold	Leasehold with 125 years plus	Leasehold with between 75-125 years	Leasehold with between 10-75 years	Leasehold with less than 10 years
Lease Length	20	Greater than 15 years	Between 10-14 years	Between 6-9 years	Between 3-5 years	Less than 2 years or vacant
Repairing Terms	10	Full Repairing and Insuring	Internal Repairing (100% recoverable)	Internal Repairing (partially recoverable)	Internal Repairing (non recoverable)	Landlord repairing
Building Quality/ Obsolescence	15	Newly built	Recently refurbished	Average condition and likely to continue to be fit for current use for 25+ years	Aged property with redevelopment potential	Nearing end of useful life/ use unlikely to continue when lease expires
Lot Size	5	Up to £4m	Between £4m-£6m	Between £7m-£10m	Between £10m-£15m	Less than £250k or more than £25m

Acquisitions

5.67 The Pre-Acquisition process described above is to ascertain the initial suitability of an acquisition into the Portfolio. It forms stage one of the acquisition process.

5.68 When an asset has been identified as a suitable acquisition to be pursued, the acquisition process will begin.

5.69 The acquisition process is described in the AM's Procedures Guidance document. This sets out the following stages of the acquisition process, which the AM will facilitate, coordinate and report on as follows;

- * Completion of the KPMG Financial Viability Model and stage 1 Checklist, including initial scoring Risk Matrix.

- * Client approval to be obtained by appropriate Member approval to proceed to acquisition due diligence (note reporting will be in "Part 11.Exempt" as this will contain commercially sensitive information).

- * AM undertakes acquisition due diligence, which will include an inspection of the property, review of leases/title/legal documents and investigation into covenants and other relevant information available at the time.

- * Submission of formal client approved conditional offer letter.

- * Agree Heads of Terms.

- * Appointment of Client's solicitor.

- * Appointment of valuation and building survey.

- * Production of an Acquisition Report (AR). The purpose of the AR is to summarise all relevant information in respect of the proposed acquisition including commentary on the forecast financial return and the overall outline business plan for the property. The AR will also provide commentary on any third party reports, highlighting where necessary, any further information/comfort required before completing the acquisition.

- * Report on Title. The AM will seek from the Client's Solicitor, a Report on Title to be appended and read in conjunction with the IM.
- * The AM will procure, prior to exchange of contracts, a Purchase Report from the introducing agent where retained.
- * The AM will be responsible for notifying all relevant professionals on timings of exchange and completion, and will notify Portfolio Valuers once completion has occurred so that the Portfolio valuation can be updated.

Disposals

- 5.70 During the lifecycle of the Portfolio it may be necessary and or opportunistic to seek to dispose of an asset/s, as highlighted previously, to balance the portfolio. This will primarily be driven by market forecasts and economic factors.
- 5.71 In addition, the success of the Asset Management Strategy (Part 6 below), which will be reflected in the asset and portfolio valuations, can also be a driver for disposal.

Ready for Sale

- 5.72 As part of the AMS, it is essential that properties to be disposed of are provided with the best opportunity to achieve best value in the shortest time possible as timing is key.
- 5.73 The approach adopted seeks to ensure that any information, measures and actions that require attention/completion prior to sale are known, to enable the risk or opportunity to be reduced or realised.
- 5.74 The Ready for Sale process is set out in the AM's Procedures Guidance Document.

Asset Disposal Process

- 5.75 The Asset Disposal Process is a specific part of the AM's Procedures Guidance Document.

- 5.76** For disposal the procedure covers timing of disposal, valuation approval, selection of selling agent, sales advice, managing the sales process and off-market procedure.
- 5.77** The Asset Disposal Process is set out in the Procedures Guidance document.

The Strategic Model

- 6.1** As per the Strategic Model, the Asset Management Strategy does not work in isolation from the Acquisition Strategy. For example each potential acquisition and disposal will need to be appraised via the Asset Management Strategy as to its potential impact on the overall performance of the Portfolio.

The Outline Strategy

- 6.2** The Asset Management Strategy adopts a risk and opportunities focused approach utilising a calculation of Performance Components to create SALBPs as identified in Part 7 of this report.
- 6.3** The Asset Management Strategy relies upon the SALBPs to drive quarterly activity, which is controlled and arranged by the Procedures Guidance as explained in Part 8 of this report.
- 6.4** The Asset Management Strategy also utilises the various performance measures adopted as part of the QFR explained in Part 9 of this report.
- 6.5** The performance measures adopted are Key Performance Measures explained in Part 10 of this report.
- 6.6** The Asset Management Strategy is inherently focused on ensuring delivery of three categorised areas of activity as identified in The Strategic Model;
- * Property Management
 - * Lease Activity and Critical Dates
 - * New Lettings and Asset Management Activity
- 6.7** The Asset Management Strategy to risk and opportunities is explained in the summary activities below, each of which is controlled by procedures as further explained in Part 8 of this report.

Property Management

Rent Demands

- 6.8** Rent demands should go out to occupiers at least six weeks before the lease due date with digital transmissions preferable. Pre-chasing of persistent late paying occupiers is to be provided if possible. Any requested or proposed changes to the collection regime as determined by the lease or licence obligations are to be justified and approved by the AM.

Security of Tenure

- 6.9** Security of tenure is a phrase used to describe the statutory right granted to tenants under the 1954 Landlord and Tenant Act to remain in occupation of its premises after its lease term expires. It means that the tenancy is protected by the 1954 Act and will continue to run until it is brought to an end in a prescribed way under the 1954 Act, regardless of the term set out in the lease.
- 6.10** Our approach to security of tenure is not to demand post expiry for non-protected tenancies without the prior approval from the AM to avoid potential unwanted security of tenure issues. Tenants requirements under protected tenancies must be utilised to best advantage by the landlord especially as a negotiating tool during lease renewals and where development opportunities are to be realised.

Credit Control

- 6.11** Regularity of contact with tenants as part of a consistent long-term approach to delivering rent collection out-performance. Take fair and appropriate actions early during the quarter period to avoid often more complex and drawn out historic arrear issues, with those that do become historic, to be dealt with pragmatically and quickly.

Rent Collection

- 6.12** Strong results are a market indicator of the performance of both the credit control function and the overall strength of the tenant covenants, which in turn can impact on the value of the held assets.

Historic Arrears Reporting

- 6.13** Can impact negatively on the overall performance of the portfolio both financially and from a time perspective for professionals involved All historic arrears require clear instructions agreed as to what actions can be taken; either action or write off.

Write Off Procedure

- 6.14** Where the arrears are agreed or proposed to be Written Off this should be approved by the AM with associated justification.

Service Charge Matters

- 6.15** The performance of the landlord's ability to deliver reliable, accurate, fair and appropriate budgets and reconciliations, in a timely fashion and with appropriate backup information, greatly reduces financial risks from loss or dispute, helps retain tenants and where required re-let vacant premises.

Insurance Matters

- 6.16** Dealing with all insurance matters knowledgeably, swiftly and in a controlled manner can greatly affect the occupiers outlook in terms of the landlords performance in this area and is therefore an important area of portfolio management and will require liaison with the Property Manager.

Gas, Water and Electricity

- 6.17** Our approach to utilities as a potential landlord cost is that services should be aligned for economies of scale and quality of service to positively impact.

Sustainability Matters

- 6.18** Whilst energy performance is primarily focused on energy consumption, it is important for the Portfolio to also ensure that all aspects, including building works and general maintenance are also reviewed against the environmental impact.
- 6.19** Sustainability Targets should be identified by the AM and agreed with the Client once the complete portfolio EPC data has been obtained.

Health & Safety Matters

- 6.20** Non-compliant or disorderly health and safety management can have a negative impact on tenant retention, lettings and sales plus creates a potential reputational risk for the Portfolio if badly managed.
- 6.21** High Level Risks should be notified by the Property Manager to the AM as soon as practicable with proposed actions and requirements to be discussed and agreed.

Tenants Repairing Obligations

- 6.22** Our approach to ensuring tenants compliance with their maintenance and repairing obligations is that failure to do so will ultimately result in higher costs of repair and replacement and therefore compliance should be managed.
- 6.23** We are focused on the risk of tenants not complying with their repairing covenants during their lease and an over reliance on dilapidation liabilities at the end of the lease resulting in landlord shortfalls and liabilities.

Property Disputes

- 6.24** Disputes can have a negative impact on tenant retention, lettings and sales and in addition can become an expense of the landlord in many scenarios.
- 6.25** It is also important to understand why the dispute has arisen with a view to improving the processes to avoid if possible going forward.

Lease Activity & Critical Dates

Rent Reviews

- 6.26** Generally all reviews should be sequenced and seek to obtain open market value or above, whilst having regard to duration of the activity and the respective cost involved.

Break Options

- 6.27** The default position is for the Council not to take any action and the option may or may not be activated. Alternatively the Council may wish to take strategic action to seek to remove a tenant option or activate a landlord's option.

Sub-Letting and Assignment

- 6.28** The approach to both sub-letting and assignment applications is not only to maintain covenant performance but where possible actively improve covenant performance.

Tenants Alterations

- 6.29** The accurate approval of tenants alterations applications in accordance with the lease requirements is an essential part of maintaining the Portfolio performance.
- 6.30** In addition, the strategy seeks to identify opportunities to improve the Portfolio performance where possible, for example by funding tenants works in return for additional rent or receiving a premium for non permitted works.

Tenant Other Applications

- 6.31** The strategy adopted requires the AM to have the opportunity to consider the application early in the process and where possible identify any risk in maintaining and or where possible improving performance.

Lease Renewals / Lease Terminations

- 6.32** Generally all lease renewals should be sequenced and seek to obtain open market value or above whilst having regard to duration of the activity and the respective cost involved. Generally all lease terminations should be supported by financial analysis and justification for the termination.

Dilapidations Liability and Claims

- 6.33** The strategy differentiates between Liability relating to during lease obligations where the tenant retains an ability to carry out works, and Claims where the tenant does not retain an ability to carry out works and the landlord is seeking a financial settlement.
- 6.34** The approach is to identify early in the process which option is preferred having particular regard to the relevant factors. Timing is a key factor in obtaining a strong settlement as traditionally in the market, the longer the settlement negotiations go on for the smaller the percentage of settlement agreed is.

Lettings and Asset Management

Vacant Premises and Ready To Let

- 6.35** The strategy for vacant premises is to ensure that all necessary information is readily available to the incoming tenant in order that timescales for completing legal documentation is as short as possible.

Business Rates Liability

- 6.36** The strategy is to seek to ensure that liability is kept to the minimum by checking liability, and where possible, identifying opportunity to reduce liability. The need to identify the accurate liability is not just of benefit to the Council but the incoming tenant who may well wish to obtain clarification that the liability is accurate and has been considered.

Major Works & Refurbishment

- 6.37** The strategy for Major Works is to ensure they are fully considered and where required, carried out in a safe, efficient and cost effective manner.

Planning Permission

- 6.38** The strategy is to seek to make changes for the benefit of the portfolio either to increase use or to make physical changes to assets.

New Lettings

- 6.39** Letting activity generally requires immersive involvement from the AM, Property Manager and New Letting Advisor to ensure best results in good time.

Capital Expenditure

- 6.40** The strategy ensures that costs are both justified and approved with a schedule of costs maintained as part of the quarterly reporting.

Major Projects and Initiatives

- 6.41** A projects approach is used where relevant to ensure best in class professionals are engaged avoiding a piecemeal approach.

7

Strategic Asset Level Business Plans

Structure

- 7.1 The SALBPs are live documents used by the AM as the working document for the respective asset management activity what will be actively updated as risks and opportunities are progressed.
- 7.2 The data from the SALBPs is linked to the QFR which displays a summary of the Performance Components at a Portfolio level along with a summary of the primary asset impacting activities.

Asset Analysis

- 7.3 The Acquisition Strategy interacts with the SALBPs in three key areas of overall portfolio activity, as below (which is reported to Members):
 - * Pre-acquisition considerations where proposed new acquisitions are modelled into the portfolio to identify changes and assess impact;
 - * During operational activity on held assets to assist with justification of proposed activity to either add value or reduce risk;
 - * Pre-Disposal, to potentially highlight assets that should be sold to improve Portfolio performance or to achieve an opportunistic or special sale value.

Business Planning

- 7.4 This first part of the process requires the Critical Dates (rent reviews, break options, lease expiries, etc) to be identified and incorporated into the plan although reporting, advising and tracking of these activities is held in the QFR .
- 7.5 The AM then carries out a range of research including physical inspections, documentation and engagement with a variety of other professionals and tenants as required.
- 7.6 This section of the business plan also maintains records of any professional advisors engaged in the business plan, plus records of their respective fees.

Performance Components

7.7 The multifarious method the AM uses to produce business plans for individual assets focuses on five definitive areas or Performance Components, identified in outline below:

- * Legal & Financial Performance (title, income, leases, covenants, rents, service charge, business rates and insurance);
- * Physical Performance (surrounding area, aesthetic impression, signage and branding, health and safety, building surveys, business activities, landlord areas, tenant areas, vacant property, sustainability and accessible information);
- * Maintaining Performance (tenant consultation, rent reviews, break options, lease renewals, assignment and subletting, tenant default, lease surrender, tenant alterations and dilapidations);
- * Active Performance (tenant consultation, assignment and sub-letting, break options, re-gears, vehicle parking and storage areas);
- * Pro-Active Performance (partial sale, change of use, advertising income, development opportunity, relocations, asset positioning, investment/asset opinion, sustainability, competition analysis, refurbishments and right sizing).
- * Economic Performance (How the asset continues to deliver economic benefits to the district.

7.8 Each element of the Performance Components are apportioned a respective percentage into current good performance activity, to improve current performance or a residual factor where a risk or opportunity cannot currently be actioned such as a neighbouring site use.

Delivery Plan

7.9 The final and active part of the SALBPs is inclusive of an Investment Analysis, an Activity Register and a Programme Calendar.

7.10 This is used as both a tracking document for the AM and a communication tool with the relevant professionals involved.

8

Procedure Guidance & Client Approval

Purpose

- 8.1** The purpose of the guidance document is primarily to set out the procedure for the various acquisition and asset management activities across the portfolio.
- 8.2** As a working document, it will be controlled and updated by the AM, who remains ultimately responsible for communicating procedure to the relevant professionals engaged in professional activity.

Client Approval Forms

- 8.3** The Client Approval Forms are a digital procedural document that provides transparency to the approval process, from appointment through to completion of the respective activity.
- 8.4** The Client Approval Form process is designed around the requirements of the Council and should be considered and understood from the outset of the instruction by all professionals involved.

Activity Procedures

- 8.5** As highlighted in The Strategic Model and explained in the AMS, there are numerous specific areas of activity where a defined procedure is required and has been devised.

Purpose

- 9.1 The QFR is an essential part of both reporting the past activity, and to an extent and as far as reasonably possible, projecting future activity and required actions and decisions that need to be made ahead.
- 9.2 It provides an opportunity for the Council to both assess, and change direction if required and covers three primary elements to the AMS as identified in the report contents page included in Appendix 11.4 of this document and further explained in outline below.

Strategic Report

- 9.3 This section of the report primarily reports on the strategic aspects of the overall AMS covering the following areas;
 - * AMS Commentary
 - * Market Commentary
 - * Standing Portfolio
 - * Portfolio Diversification
 - * Portfolio Sector Balance
 - * Acquisitions and Disposals

Measurement

- 9.4 The Measurement section of the QFR reports the KPI's selected to be relevant to the Portfolio as explained further in Part 10 of this report.
- 9.5 The measures are aligned with traditional commercial property investment portfolio management criteria for assessing the overall performance of investment portfolios.

Asset Management

9.6 This final section of the Quarterly Fund Report is primarily the Asset Management elements covering the following areas;

- * Asset Management Commentary
- * Income Projections and Risk
- * Portfolio Performance Components
- * 18 Month Rent Reviews, Break Options, Lease Expiries
- * Dilapidations Liability and Claims
- * Vacant Property
- * New Lettings
- * Capital Expenditure
- * Major Projects and Initiatives

Appendices

9.7 In addition to the three sections of the report identified above, the report also provides a variety of additional schedules and information including;

- * System Tenancy Schedules
- * Arrears Reports
- * Planned Preventative Maintenance
- * Forward Funding Register
- * Portfolio EPC Register
- * Sustainability Improvement Plans
- * Health and Safety Report

- * Tenant Maintained Parts Register
- * Sub-Letting Applications
- * Tenants Alterations Schedule

Purpose

- 10.1 The AMS relies heavily upon obtaining and understanding the selected KPIs. By tracking the KPIs, portfolio performance can be measured, compared to the market or Client target and greatly aid the decision making process to make change.
- 10.2 Each of the KPI are reported in both data and graphical form to aid understanding and are accompanied with an explanation of the purpose of the KPI and a quarterly explanation from the AM included.

The Key Performance Indicators

Total Property Return

- 10.3 Aims to compare performance of the asset portfolio against actual market performance from the property market index data.

Rental Value Growth

- 10.4 Aims to compare performance of the asset portfolio against actual market performance from the property market index data.

Reversionary Profile

- 10.5 Based upon the valuation Estimated Rental Value (ERV) across the asset portfolio, this KPI aims to project the reversionary income over what we recommend is a five-year period. The reversion is expressed in both cash flow terms and as a percentage of ERV.

Rent Collection

- 10.6 To maximise cash flow and minimise any potential bad debts. This is also an indicator of the quality of the tenants and the credit control effectiveness. We would propose that percentage of rent collection invoiced within 14 days of the due date target is used for KPI reporting, which in the market is traditionally 95%+ on a quarterly basis.

Service Charge Performance

- 10.7** The data simply tracks delivery of both budgets and reconciliations required to be completed during the reported quarter. The data can become particularly important where proposed disposals are considered as this information is of great importance to a purchaser.

Tenant Retention Rates

- 10.8** To identify tenant retention performance where tenant breaks and lease expiries exist, expressed as a percentage ERV split between retained and not retained as a percentage of ERV at risk during the quarter. This helps to demonstrate the overall strength of tenant relationships and the appeal and competitiveness of the market product.

Tenant Covenant Strength Record

- 10.9** To identify the average covenant strength across the portfolio as a financial ranking traditionally on an annual basis but quarterly for this portfolio.
- 10.10** Establishes a point in time of portfolio covenant strength, bolstering confidence of tenant receipts, and highlights changes within the asset portfolio enabling associated asset management actions to be considered potentially increasing value and reducing risk.

Average Weighted Unexpired Lease Term

- 10.11** To identify both average lease term remaining to first break, or expiry, across the portfolio weighted by contracted rental income. This can help demonstrate the effect of new leases or new voids as a single KPI expressed in terms of years.

Void Management Rate

- 10.12** To benchmark the asset portfolio void rate against the European Public Real Estate Association vacancy rate or the clients chosen target rate once income profiles have been established.

Energy Performance

- 10.13** To identify how energy efficient the assessed buildings or entire portfolio are. This KPI can be used to demonstrate changes to the ratings, following for example a landlord refurbishment to a relevant building, but also demonstrate asset portfolio overall performance.

Tenants Repairing Obligations

- 10.14** Repairing obligations not undertaken by tenants create risk within the portfolio and are tracked to identify and control during the year. The data reflects the total number of leases checked for internal and external repairing obligations and a single figure provided.

Property Disputes

- 10.15** Property disputes are defined as those requiring legal advice or action to be taken and in general will exclude traditional tenant rent specific collection issues but includes disputes involving service charge or insurance matters.

The Principle Risks

Inconsistent Strategy

- 10.16** Certain internal or external factors could impact on the strategy such as changing economic conditions requiring strategic change. Changes in the economy can impact adversely on property sector performance resulting in capital depreciation or income not covering the costs of borrowing resulting in a net cost of to the Council of holding the asset. The controls are to review and report this principle risk on a quarterly basis in addition to the annual review by the AM primarily led by local, regional and national research.

Acquisition and Asset Management Activity

- 10.17** Process and performance of a range of professional advisors can play an important part in delivery of the strategies to include: acquisition and disposal advisory and third parties, appointed lease event advisers, letting / sale agents, valuers, external property managers, internal estates team, legal advisors, asset management reporting.

Non-compliance with Health and Safety

- 10.16** Primarily an external property management function but does impact in other areas. Controls are for the external property manager to report on risks via a suitable system quarterly with performance related targets in place.

Terrorism and Other Interruption

- 10.17** Potential for actions to render property incapable of receiving income and potential reputational damage. Controls are to ensure that buildings have an incident management procedure, fire protection and security measures in place, fire and general risk assessments carried out annually, plus insurance cover to provide for loss of rent and terrorism.

11 Report Appendices

- 11.1** The Strategic Model
- 11.2** Strategic Asset Level Business Plan - Illustrative Example
- 11.3** Procedures Guidance Cover Page and Contents Pages
- 11.4** Quarterly Fund Report Contents Page