

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.

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
- 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.

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
 - 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.
- 2.2 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 for car parking for the railway station 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

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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. 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.

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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:

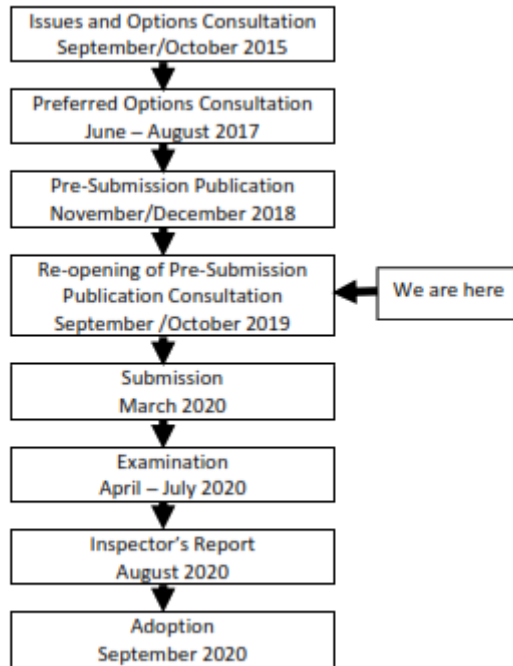
Date	Time	Venue
<u>Wednesday 11th September 2019</u>	<u>3pm to 6pm</u>	<u>Blakedown Parish Rooms</u> <u>18 Belbroughton Road</u> <u>Blakedown</u> <u>DY10 3JG</u>
<u>Wednesday 18th September 2019</u>	<u>3pm to 7pm</u>	<u>Corn Exchange</u> <u>Kidderminster Town Hall</u> <u>DY10 1BD</u>
<u>Thursday 19th September 2019</u>	<u>2pm to 4:30pm</u>	<u>Wribbenhall Parish Rooms</u> <u>Bewdley</u> <u>DY12 1BY</u>
<u>Saturday 28th September 2019</u>	<u>10am to 1pm</u>	<u>Stourport Civic Hall</u> <u>DY13 8UJ</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>1.96</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>35.21</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.

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- 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 balanced out through biodiversity net gain.**

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.

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- 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 and provide biodiversity net gain**
- 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>

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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/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 the site to the north will require buffering with embankment and woodland retained as open space. There is potential for SuDs and the creation of a 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.

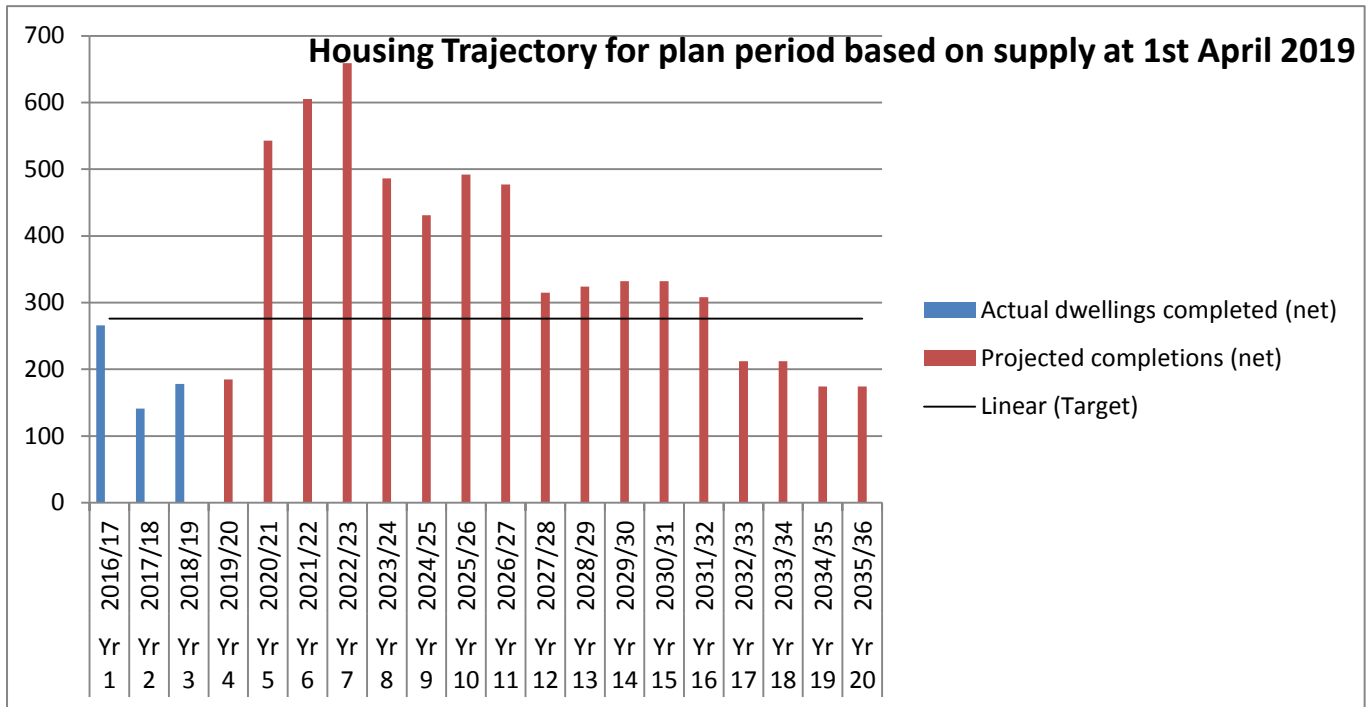
Reasoned Justification

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 1st April 2019.



13. Appendix A – 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.