

# **Summary of Consultation Responses**

## **Local Plan Review Preferred Options Consultation (June 2017)**

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## 1) Summary of Consultation Responses

### Introduction

This report sets out a summary of the consultation responses received by Wyre Forest District Council for the consultation on the Local Plan Review Preferred Options consultation.

### Background

As part of the Local Plan Review, the Council produced a 'Preferred Options' document for consultation which took into account the Issues and Options consultation carried out in late 2015 along with the body of evidence that the District has now developed. The Preferred Options document identified two potential approaches to how Wyre Forest District might meet its development requirements in the period up to 2034 along with proposed strategic, development management and allocations policies.

### Preferred Options Consultation

The Local Plan Review Preferred Options Consultation took place between Thursday 15<sup>th</sup> June 2017 and Monday 14<sup>th</sup> August 2017. This was the second stage of the Local Plan Review.

During the consultation period the Council sought views on the Preferred Options document. The Preferred Options consultation is the main consultation opportunity for the community and other stakeholders to comment and influence the sites that the Council has identified as being the most suitable to allocate for development purposes. The consultation was in accordance with the Town and Country (Local Planning) (England) Regulations 2012, as set out in the Statement of Community Involvement (adopted February 2013). A total of 5029 responses were received to this consultation.

### Preferred Options Call for Sites

A call for sites exercise was undertaken as part of the Preferred Options consultation. A total of 51 sites were submitted for consideration. A list of these sites with accompanying maps can be found at Appendix 1 of this document.

### Next Steps

The next stage in the plan making process is for the Council to publish the pre-submission version of the plan – this is the version the Council intends to submit to independent examination. The consultation responses to the Preferred Options document will help shape the next version of the plan.

Prior to being submitted for examination the pre-submission plan will be subject to consultation and the representations made will be the focus of the examination. The pre-submission plan will be published in November 2018 for a minimum 6 week public consultation.

## 2) Publicity for the Preferred Options Consultation

### Letter, Emails and Publicity

Over 919 emails / letters were sent out to all stakeholders on the Local Plan Consultation Database, including all those who had made submissions to the 'Call for Sites' exercise. This informed them of the Preferred Options consultation, detailed where to get further information (including dates of consultation drop-in sessions) and explained how to respond.

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A publicity leaflet was delivered to households within the District by Royal Mail. The leaflet notified residents of the Local Plan Review Preferred Options consultation and outlined the dates and times of the consultation drop-in sessions where documents could be viewed and details of the consultation website where documents could be downloaded. It also gave details on how residents could respond to the consultation and the closing date.

People were given the option of responding to the consultation through an online consultation response portal, electronically by email or post.

The Preferred Options document and Sustainability Appraisal were available for public viewing at the Worcestershire Hub, Vicar Street, Kidderminster and local libraries within the District.

The Preferred Options document, Sustainability Appraisal and all the evidence base studies were made available for public viewing on the Council's website and were also made available at all of the consultation drop-in sessions.

Posters were taken for display to a wide range of accessible locations throughout the District, such as local supermarkets. The table below lists the locations:

**Table: Poster Displays**

<b>KIDDERMINSTER</b>
Kidderminster Library
Wyre Forest Hub/Town Hall
Wyre Forest Leisure Centre
Tesco
Sainsbury
Morrisons
Asda
Iceland
Hodge Hill Garden Nurseries
Barnetts Hill Garden Centre
<b>STOURPORT</b>
Stourport Library
Stourport Civic Hall
Tesco
Co-op
Lidl
Cooks Garden Centre
<b>BEWDLEY</b>
Bewdley Library
Bewdley Museum
Bewdley Leisure Centre
Co-op
Tesco
Hopleys Farm Shop
<b>RURAL AREAS</b>
Wyre Forest Discovery Centre
Cookley – Tesco and Post Office
Blakedown Post Office
Chaddesley Corbett Post Office
Wolverley Stores
Fairfield Shop

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Upper Arley Post Office
Rowberry Farm Shop
Far Forest Post Office/stores
Colliers Farm Shop
Clows Top Post Office

All Town and Parish Councils were sent a consultation notice and asked to display it on their notice boards for public viewing.

Summary leaflets were available at all of the consultation drop-in sessions.

### Web-based Communication and Social Media

An interactive version of the Preferred Options Document was made available to enable electronic representations to be made. The response form could also be downloaded and printed or filled in and submitted online. Representations were also accepted by email or post. A copy of the response form can be found at Appendix 4 of this document.

A link to the Local Plan Review Preferred Options consultation was made available on the homepage of the Council's website.

The Local Plan Review Preferred Options document, Sustainability Appraisal and all the evidence base studies were available for viewing on the Council's Planning Policy web pages. The website also included full details of how to respond to the consultation, including the consultation response form and an online consultation response portal.

The Local Plan Review Preferred Options consultation was promoted through the Council's Facebook and Twitter accounts:

Facebook (number of people reached and the number of shares):

- 15 June – updated cover photo with Local Plan Review banner – 187 reached
- 15 June – 2,113 reached
- 7 July – 1,386 reached, 2 shares
- 10 July – 57 reached
- 17 July – 483 reached, 3 shares
- 19 July – 40 reached
- 21 July – 99 reached
- 24 July – 2,199 reached, 1 share
- 26 July – 114 reached
- 27 July – 100 reached
- 28 July – 52 reached
- 29 July – 53 reached
- 31 July – 181 reached
- 1 August – 918 reached
- 4 August – 378 reached
- 11 August – 844 reached
- 13 August – 87 reached
- 14 August – 64 reached

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### Twitter:

- 16 tweets were sent out during the 8 week consultation period reaching a potential audience of many thousands.

### Press Coverage

Press releases were issued by the Council on the following dates:

- 11<sup>th</sup> May 2017
- 15<sup>th</sup> June 2017
- 11<sup>th</sup> July 2017
- 15<sup>th</sup> August 2017

### Statement to Shuttle

- 19<sup>th</sup> July 2017

News articles providing information on the Local Plan Review Preferred Options Consultation and potential site allocations were published in the Kidderminster Shuttle and the Express & Star during the course of the consultation period.

There was also coverage of the Local Plan Review Preferred Options Consultation on local radio stations and BBC Hereford & Worcester.

### Engagement with Residents and Stakeholders

During the eight week public consultation on the Preferred Options document eight drop-in sessions were held. These were staffed at accessible locations in the three main towns of the District; Kidderminster, Stourport-on-Severn and Bewdley and in areas of impact of the proposals. Display boards were erected at the drop-in sessions. The drop-in sessions provided an opportunity for residents and stakeholders to raise questions regarding the proposals set out in the Local Plan Review Preferred Options document, Sustainability Appraisal and all the evidence base studies prior to making a formal response. This included weekday/weekend drop-in sessions at the following venues:

Date	Time	Venue
Monday 10 <sup>th</sup> July 2017	3:45pm – 8pm	Heronswood Primary School, Spennells, Kidderminster
Wednesday 19 <sup>th</sup> July 2017	2:00pm – 7:00pm	The Wyre Room, St George's Hall, Load Street, Bewdley
Friday 21 <sup>st</sup> July 2017	1:00pm – 5:30pm	Rowland Hill Centre, Kidderminster
Saturday 22 <sup>nd</sup> July 2017	10:00am – 4:00pm	Offmore Evangelical Church Hall, Kidderminster
Wednesday 26 <sup>th</sup> July 2017	1:30pm – 6:30pm	Areley Kings Village Hall, Stourport
Friday 28 <sup>th</sup> July 2017	2:00pm – 7:00pm	Cookley Village Hall
Saturday 29 <sup>th</sup> July 2017	10:00am – 4:00pm	Stourport Civic Hall
Friday 4 <sup>th</sup> August 2017	2:00pm – 7:00pm	St Oswalds Church Centre, Broadwaters Drive, Kidderminster

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The drop-in sessions were attended by over 1800 people.

### Duty to Cooperate

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

In order to fulfil the requirements of the Duty to Cooperate, all neighbouring authorities and consultation bodies covered by the Duty to Cooperate received a separate form to complete which allowed any concerns to be raised. Where there were no relevant issues the completed forms provided an audit trail to demonstrate that the Duty has been fully considered and complied with. Where cross-boundary issues were identified, met with each of the neighbouring authorities or organisations concerned to discuss the issues and how the Plan can best address them.

### Processing of Comments Procedures

All responses submitted to the District Council online, by letter and email were acknowledged by the Council. The Planning Policy Team carefully analysed all comments and suggestions to prepare this report which is a summary of the consultation responses received. This report will be presented to and considered by the Local Plans Review Panel, Overview and Scrutiny Committee and Cabinet.

## 3) Respondents and Representations

There have been 1,809 respondents to the consultation. These respondents have raised 5,029 representations in total. Each individual or organisation making responses is known as a respondent. A single respondent can make multiple representations.

In addition the Council received 6 petitions in relation to the plan from the following groups:

- Burlish & Lickhill Friends
- Hodge Hill Farm Residents Association
- Offmore and Comberton Action Group
- S.A.F.E (Spennells Against Further Expansion)
- S.A.L.T (Summerfield Against Land Transformation)
- Save the Green Belt

More information on these petitions can be found at Section 4e of this document.

## 4) Summary of Consultation Responses from Statutory Consultees, Parish and Town Councils and Petitions

This section sets out a summary of the key issues raised by the following:

- 4a) Statutory Consultees
- 4b) Wyre Forest Parish and Town Councils
- 4c) Parish Councils outside of Wyre Forest District
- 4d) Other Non-Resident Representations
- 4e) Petitions

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Section 6 of this document covers the proposed site allocations and identifies the key issues raised by those who responded to us during the consultation period. These key issues can be found at Appendix 3b. Summaries of the responses are at Appendix 3c.

### 4a) Statutory Consultees – Key Issues

The following gives a summary of the key issues raised by the Statutory Consultees. A list of the statutory consultees consulted can be found at Appendix 5 of this document:

**Worcestershire County Council** – a summary of WCC comments are as follows:

Infrastructure – unlikely that development alone will pay for delivery of infrastructure and external funding will be required from different sources. Some of the infrastructure required may be outside WFDC area e.g. wider transport network.

Green Infrastructure – Support neither Option A or B but a hybrid. Sites need to be assessed - ecological assessment or biodiversity impact assessment in relation to green infrastructure (landscape assessment, biodiversity, blue infrastructure, historic environment). Worcestershire Green Infrastructure Partnership willing to work with WFDC to develop a green infrastructure approach to site allocations. Should aim to deliver 40% GI notwithstanding site by site viability.

Education – where there is a need for additional primary school places additional provision will be required to support level of housing in the Plan. Secondary schools may need to expand to accommodate pupil number growth from development (Kidderminster and Stourport).

Transport - No transport modelling has taken place, this will confirm if eastern relief road is needed and information regarding sites. A revised and improved approach to parking in Bewdley and Stourport needed.

Additional gypsy/traveller sites have not been identified. Policy states “further small scale sites to meet the indicative need of 21 pitches to 2034 will be allocated in LP” (Policy 8E).

Mineral resource – Housing and employment needs outweigh the long term economic value of the mineral resource. Opportunities should still be optimised for partial extraction. None of the Minerals Local Plan potential site allocations overlap with potential Wyre Forest Local Plan (WFLP) sites but some are in close proximity.

Existing waste management sites in Wyre Forest District should be safeguarded.

Recommend WFDC produce a health Supplementary Planning Document to support Policy 9 Health and Wellbeing, WCC wish to discuss this with WFDC.

Worcestershire Archive and Archaeology – no specific comments regarding site allocations. Believe none of proposed allocations would directly impact on a designated heritage asset.

**South Worcestershire** - Concerned that unmet housing need in Birmingham is not acknowledged. It is understood that some of this growth may need to be exported to adjacent Housing Market Areas, particularly those with a clear functional relationship with Birmingham and the Black Country, such as Wyre Forest. It is not clear how the additional growth addresses unmet need arising from outside of Wyre Forest District. Wyre Forest District may need to consider higher levels of growth to absorb some of this need.



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Housing and employment sites that border Wychavon and Malvern Hills District administrative boundaries could have cross boundary infrastructure delivery implications which will need to be considered.

Concerns about growth at Areley Kings under option B (approx 550 new dwellings). Adjacent to the MHDC boundary; MHDC has already approved development in this area. Infrastructure implications of any site allocations in this area need to be carefully considered to ensure that sufficient capacity exists. Impact of growth on the river Severn crossing within Stourport should be considered, particularly as there is no longer an intention to deliver the Stourport Relief Road in Local Transport Plan 4.

Wyre Forest District Local Plan should focus on improving the accessibility of and services to/from local stations within Wyre Forest District rather than emphasise park and ride from Worcestershire Parkway which could exacerbate congestion on routes such as the A449.

Clows Top for 30 dwellings - SWDP allocated 17 dwellings in Clows Top, Shropshire could also propose development. Would need to ensure that adequate infrastructure is provided and avoid an over concentration of development within the village.

South Worcestershire Councils welcome the opportunity for further discussions with Wyre Forest District Council as the Local Plan Review progresses in order to comply with on-going requirements associated with the Duty to Cooperate. Consequently the SWCs wish to continue to be consulted on subsequent stages of the Wyre Forest Local Plan review.

**Bromsgrove and Redditch** – Supports the aims and objectives of the plan and think that it has the potential to provide a strong base for planning in Wyre Forest once adopted, although a number of reservations do exist where clarity needs to be provided in order for their concerns to be allayed.

They have said that continued liaison will be important to ensure that if all the needs of the Birmingham Housing Market Area (BHMA) cannot be met within the currently identified geographic area, then it could be that those areas on the periphery may need to assist in meeting those needs if it can be done sustainably. It is suggested that the review of the Wyre Forest Local Plan will need to have sufficient mechanisms in place to be able to respond appropriately to any requests to meet the needs of the wider BHMA should a request be forthcoming.

Concerns:

- Preferred option not specified.
- Location of core sites east/north east Kidderminster.
- Impact of road network in Bromsgrove District

A Duty to Cooperate meeting was held in October 2017 to discuss these issues with Bromsgrove & Redditch Councils.

**Birmingham City Council and Black Country Local Authorities** – Shortfall in housing within Birmingham and the Black Country HMA. WFDC economic led figures will result in-migration particularly of working age from Birmingham. OAHN verifies ageing population and identifies in-migration as principal source of population growth.

Situation in South Worcestershire Authorities mirrors WFD as also seeking economic led growth which requires more people than demographic projections suggest and is reflected in adopted SWDP. Suggestion that WFDC may need to take some additional growth from Birmingham City and Black Country if they are unable to meet the demand in their own Housing Market Area.

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Duty to Cooperate meetings have been held with Birmingham City Council and the Black Country Local Authorities to discuss these issues.

**South Staffordshire**- They refer to the Peter Brett Associates Strategic Housing Needs Study work published in November 2014. This Study confirmed that whilst WFDC is not part of Greater Birmingham and Black Country Housing Market Area, it has close links with it. South Staffs also say that WFDC is best fit with the Worcester HMA along with the three South Worcestershire Authorities (Worcester, Malvern Hills and Wychavon), but as these authorities have an adopted plan, it follows that for the purpose of this round of local plan making, WFDC is a free standing HMA.

Situation in South Worcestershire Authorities mirrors WFDC as also seeking economic led growth which requires more people than demographic projections suggest and is reflected in adopted SWDP. Suggestion that WFDC may need to take some additional growth from Birmingham City and Black Country if they are unable to meet the demand in their own Housing Market Area.

Shortfall in housing within Birmingham and Black Country, WFDC economic led figures will result in migration particularly of working age from Birmingham and Black Country. OAHN verifies ageing population and identifies in-migration as principal source of population growth.

A Duty to Cooperate meeting was requested to discuss these issues in more detail with a view to signing a Duty to Cooperate Statement / Memorandum of Understanding between the relevant local authorities.

Duty to Cooperate meetings have been held with South Staffs, Birmingham City Council and the Black Country Local Authorities to discuss these issues.

**Natural England** – Natural England are concerned about sites which could affect nationally designated sites around the town. These were referred to in their consultation response back in 2016 and remain unaddressed in the Preferred Options document recently consulted on. They requested a meeting with the Council to discuss these concerns and to draw the Council's attention to the fundamental nature of these concerns and the need to ensure as far as possible that the plan can be judged 'sound' at the next stage of local plan making.

Natural England also gave the following advice regarding proposed site allocations:

- **Green Infrastructure** – Proposed allocations should maintain and enhance the green infrastructure resource by connecting with existing GI and providing new GI on site. NPPF para 114 refers.
- **Priority Species and Habitats** – Proposed site allocations should take account of records of these assets. NPPF para 117 refers.
- **Protected Species** – as above. Their standing advice refers.
- **Ecological networks** – Proposed allocations should set out how connectivity of the network will be maintained or enhanced.
- **Rights of Way** – Proposed allocations should protect and enhance public rights of way, incorporating them into new development in sympathy with their character and quality. NPPF paras 74 and 75 refers.

In particular, Natural England has concerns with the following sites:

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- FPH/1, Settling ponds, Wilden Lane – concerns that development in this location could potentially impact on the Wilden Marsh & Meadows SSSI.
- BW/4, Hurcott ADR – this site is adjacent to the SSSI and a residual negative impact on landscape and biodiversity may result unless mitigation is in place. Natural England acknowledge that the local plan policy explains that extensive areas will be left undeveloped to protect the adjacent Hurcott Meadows SSSI.
- WFR/WC/15, Lea Castle – This site includes large tracts of woodland and acid grassland that needs to be protected and that fragmentation of ecological corridor should be avoided.
- BR/RO/7, New Road Far Forest and BR/BE/6, Land off Highclere – priority habitats should be considered within these allocations.
- AS/5, Victoria Carpets, Sports Ground – The potential impact on the Wilden Marsh & Meadows SSSI via the Hoo Brook should be considered.
- OC/13 East of Kidderminster – Natural England support the proposed enhancements to the watercourse and pools for this area but the potential impact on Wilden Marsh & Meadows SSSI should be considered.
- MI/3, Parsons Chain – The potential impact on the Hartlebury Common and Hillditch Coppice SSSI should be considered.
- FPH/10, British Sugar Phase 2 – the potential impact on Wilden Marsh & Meadows does not appear to have been fully considered.
- BW1, Churchfields & BW2 Lime Kiln Bridge – the impact on deciduous woodland, the River Stour and Wilden Marsh Meadows should be considered.

A meeting was held with Natural England in November 2017 to discuss the issues raised in their consultation response.

**Environment Agency** – Environment Agency advise that detailed modelling may be required to inform site specific FRAs for sites in flood zones 2 & 3. Recommend that caveat is included for those sites affected.

Concerns that River Stour/Severn confluence has not had modelling done to assess flood scenario on River Stour. Site specific FRAs should investigate this to ensure safe development.

Site allocations which include areas of Flood Zones 2 and/or 3, recommend there is sufficient land available within Flood Zone 1 to accommodate the proposed development (i.e. number of houses or hectares (ha) of employment land).

Recommend when assessing site allocations previous uses of site are assessed to ensure site is appropriate and viable for remediation. FPH/1 partially located over landfill, LI6/7 partially located upon landfill.

Expect review of groundwater vulnerability and SPZs and information on Water Framework Directive to further inform site consideration.

Water Cycle Study – the EA are satisfied that this evidence base study covers all necessary aspects. Evidence base document robust enough to inform Plan.

EA note that the Plan makes strong recommendations to utilise SuDS for surface water drainage from development, and EA support this approach. EA also support the fact that all aspects of sewerage network constraints, sewage treatment works capacity and related issues such as odour and flood risk from increased waste water discharges have been considered.

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**Historic England** – Generally supportive. Suggestions for amendments to proposed policy wording and to add more relating to historic environment/landscape. Historic England are concerned that the proposed site allocations have not been considered properly against the historic environment implications. Historic England therefore offered to meet with the Council to discuss the proposed site allocations and to assist the Council in developing an assessment process. A meeting with Historic England was held in November 2017 to discuss their concerns in more detail.

**Highways England** – Highways England are responsible for the operation and maintenance of the Strategic Road Network (SRN). The network includes all major motorways and trunk roads.

Highways England has no preference as to which option should be brought forward. However, they note that there may be material implications for the network at M5 junctions 3, 4 and 6 arising from increased levels of traffic associated with development in Wyre Forest. In order to develop a clearer understanding of the implications of the proposed allocation of development for the SRN, Highways England has identified the need for more detailed traffic assessment of M5 Junction 4 as a priority. This junction is already affected by development arising from the plans of Bromsgrove District and Birmingham City Councils. Furthermore, the implications of development traffic at M5 Junction 3 are likely to be affected by traffic growth associated with the plans and strategies of Bromsgrove District Council, the Black Country Authorities and Transport for West Midlands.

Highways England seek to work in partnership with Wyre Forest District Council and Worcestershire County Council as the Local Highway Authority to consider these implications and identify if any mitigation measures are required to support the identified growth in Wyre Forest District.

Highways England therefore seeks to encourage on-going engagement with Wyre Forest District Council and Worcestershire County Council during the plan making process.

**Network Rail** – The Council are advised that there are level crossings at Blakedown Railway Station and Hartlebury Railway Station. The possibility of increased usage levels of pedestrians and vehicle users at the level crossing could increase the risk scores at both level crossings.

Development should include consideration of impact on level crossings and mitigation. Adequate parking is needed at Kidderminster and Blakedown Stations.

**The Coal Authority** – Wyre Forest District has had coal mining which can cause future problems. The Coal Authority High Risk Development Area covers approx 2% of WFD. Preferred option sites are not in these areas.

The Coal Authority welcomes paragraph 16.21 (Legacy of Minerals Extraction) in the emerging Local Plan which states that there is a mining legacy within the District and that where development is proposed in areas with a known legacy of minerals extraction, the developer will be expected to assess the site for ground contamination, ground stability and mining hazards and submit appropriate mitigation reports in support of their planning applications.

### 4b) Wyre Forest Parish and Town Councils – Key Issues

The following gives a summary of the key issues raised by the Parish and Town Councils:

**Bewdley Town Council** – Support for many policies in emerging Local Plan. Object to inclusion of Highclere (BR/BE/6) and proposed travelling showpeople site at land off Habberley Road (WA/BE/6).

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Support the other proposed sites in Bewdley; Stourport Rd Triangle (WA/BE/1), Land south of Habberley Road (WA/BE/5), and Catchems End (WA/BE/3).

**Kidderminster Town Council** – No representation received.

**Stourport Town Council** – Proceed with Option A not B.

Reasons:

- Use sites in town not in Green Belt – the sites LI/5 Burlish Crossing and MI/17 Stourport Manor are currently in the Green Belt. STC considers it unnecessary to extend into the Green Belt when there are a number of Core sites in the town which should be given priority.
- Development sites such as AKR/20 Carpets of Worth and/or AKR/2 Cheapside are not being brought forward for development by allegedly unrealistic assumptions of development value by the landowners. The Council might wish to consider Planning or Regeneration CPO powers to bring such landowners to a realistic expectation of land value.
- Sites AKR/14 Pearl Lane and AKR/15 Rectory Lane – STC considers that development of these sites would encroach into the open countryside and lead to further exacerbate the high level of traffic congestion across the bridge and add to air pollution in the town centre.
- Option B does not provide for any highway or other infrastructure improvements within and around Stourport. Option A proposes a new road which would link the A449 with the A448 which would provide new infrastructure to support the proposed new development around the Spennells Estate.

**Chaddesley Corbett Parish Council** - Generally supportive of the policies set out in the Preferred Options document. The Parish Council supports Option B as it considers this option will require the least amount of Green Belt to be lost. The Parish Council also consider the impact of Option B on the Western settlements could be reduced by using the Option A site close to Lea Castle, which may also assist in enabling infrastructure improvements.

The need for a solution to traffic volumes and congestion is understood by the Parish Council, but the proposals are not attractive in that the plan appears to be for a relief road running through the centre of an extensive residential development. Would this constitute 'a desirable place to live', or assist in improving air quality for residents?

The extensive area to the East, defined as 'core sites' represents a major challenge. The manner and timing for the release of sites, and controls over the character of the development will be critical to ensuring that the end results make a positive contribution to 'quality design and local distinctiveness' – rather than producing a characterless urban sprawl with no sense of place. The more dispersed development set out in Option B offers greater opportunities for delivering quality design and for working with the grain of local distinctiveness.

Both options A and B will have a major impact on traffic and other travel volumes heading East, toward Birmingham, the motorways and inter-city rail links. Wyre Forest must work closely with the County Council to address road locations that are already pinch points, such as Mustow Green and various junctions in Hagley.

Travelling showpeople preferred site – Clows Top as this is a brownfield site.

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**Churchill and Blakedown Parish Council** - Proposed employment site on A456 in conflict with Churchill and Blakedown Neighbourhood Plan.

Very concerned with additional traffic travelling through Blakedown if proposed sites go ahead, eastern relief road would add pressure on A456. Oppose any threat to Hurcott SSSI. Lea Castle in catchment for Blakedown school which is oversubscribed. Parkway Station at Blakedown unwelcome, want to be involved in any discussions for parkway station. Multi storey at Kidderminster Station should be explored.

Overall, the Parish Council are disappointed with the lack of infrastructure proposals to support the plan. The proposal for an eastern relief road seems to have been ill thought through as it would add further pressure on the A456. If the junction of the A448 and the A450 was improved it would divert traffic from the centre of town and relieve pressure on the A456.

**Rock Parish Council** – Support Option A. The Parish Council wish to draw attention to the following points raised by residents of Far Forest:

- Potential loss of wildlife and harm to the landscape;
- Various protected species are located on the proposed development land;
- Harm to the Landscape Protection & Hedgerows;
- The Primary School at Far Forest cannot accommodate additional pupils;
- Concern at the increase of traffic in New Road especially after the last schools review;
- Road safety in and round Cleobury Road & New Road;
- No car park for Far Forest Church causes problems;
- Plough Lane used as Bus Stop for school children in morning;
- Sewage system in Far Forest is still a major ongoing issue as the upgraded system cannot cope with the current dwellings.

The Parish Council also oppose the site at Clows Top for travelling showpeople.

The Parish Council wish to support the idea that the new Local Plan contains a policy to encourage the refurbishment of the Bliss Gate Inn to be converted into units of accommodation together with the use of the rear car park immediately adjoining the former Inn. This site although seen a decade ago as a community asset has now fallen into a poor state of repair and really does great harm to the gateway into the Bliss Gate Village.

**Rushock Parish Council** - do not object to any of the content but concerned about the proposed erosion of the Green Belt, and the effects of the proposed residential developments on already overcrowded roads, medical services, social services and schools in the district.

**Stone Parish Council** - Support Option B. Stone Parish Council wish to make the point that they believe King Charles High School on Chester Road should be closed and the site developed for housing, moving the High School down onto the site adjoining the King Charles Lower School at Borrington Road thus having one large combined Education Establishment serving the needs of Eastern Kidderminster.

**Upper Arley Parish Council** – The Parish Council has made a comment regarding Policy 35 Villages and Rural Areas Site Allocations - Core Sites for Allocation.

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The Parish Council has no issue at all with this proposal for 10 dwellings on allotment site in Upper Areley. However, the Parish would prefer that in the event of any development taking place, ALL the houses (not just some of them) should be affordable houses, of a smaller design, and for the people of the parish only and would request that this is a condition of any planning permission granted. Other than the site referred to the Parish Council does not wish to see any other development in the Parish.

**Wolverley and Cookley Parish Council** – Support development on Lea Castle Core Housing Site (WFR/WC/15) if infrastructure is in place to support this level of development. Totally opposed to development of Option A Lea Castle Hospital extension (South) (WFR/WC/16) as Cookley would be joined to Kidderminster and this would remove important Green Belt land and be contrary to retaining the local identity of Cookley.

The 3 ADRs in the Parish (Land off Hayes Road, Wolverley, Land off Lowe Lane, Wolverley, and Land off Kimberlee Avenue, Cookley) should be retained and safeguarded and not be used for housing development.

### 4c) Parish Councils outside of Wyre Forest District – Key Issues

The following gives a summary of the key issues raised by Parish Councils outside of Wyre Forest District:

**Bayton Parish Council** - Object to site at Clows Top for travelling showpeople, want affordable dwellings in Clows Top. Criticism that residents living on the MHDC side of Clows Top did not receive any information on this matter.

**Hagley Parish Council** – Concerns regarding traffic and any additional traffic on A456, loss of Green Belt, consider OAHN housing number too high, sites contributing to traffic problems. Want mitigation for Hagley.

**Pensax Parish Council** – Object to site at Clows Top for travelling showpeople, want affordable dwellings in Clows Top.

**Shrawley Parish Council** – No comments to Option A. Impact of Option B (Areley Kings) likely to be significant, traffic, no proposal for second bridge at Stourport, with already approved scheme and (possible Gladmans appeal) needs adequate infrastructure. Want WFDC, MHDC and WCC to work together on this.

### 4d) Other Non-Resident Representations – Key Issues

The following gives a summary of the key issues raised by other non-resident representations:

**CPRE** – non Green Belt sites should be considered before taking land out of the Green Belt. Housing need can be met without using Green Belt, housing figure too high.

**RSPB** - Favour Option B. Little to separate Option A or B in terms of impact on wildlife. Option A impact on wildlife likely to be greater. None of areas significant. Only exception corn buntings around Stanklyn Lane area they are of County importance and possibly regional importance (West Midlands). Corn buntings cannot be accommodated in housing area so off site compensation either:

- 1) Large-scale habitat compensation in the form of flower rich/species rich grassland creation for corn buntings (200 hectares), or
- 2) Manage remaining farmland better for corn buntings.

RSPB are happy to advise further when final option decided on.

**Worcestershire Wildlife Trust** – Objective to protect and enhance the District’s biodiversity should be added to the Plan’s Aims and Objectives.

Not able to support Option A or B in their entirety as both options likely to have significant implications for biodiversity; WWT recommend a blend of the two options where site allocation likely to lead to significant adverse impacts on biodiversity are removed. WWT object to the Wilden lane, settling ponds site. They have reservations regarding Kidderminster Urban Extension due to adverse ecological impact in particular on designated sites including Hurcott and Podmore Pools SSSI, Captains and Stanklyn Pools, Spennells Valley and Hoo Brook Local Wildlife Sites (LWS) and species of importance including Corn Bunting, Hornet Robberfly and Tower Mustard. Concern about information used in decision making process. Further work to determine impact of proposed allocations will be required to ensure Local Plan is based on sound advice. Biodiversity constraints have not been considered properly in the evidence base for the Plan on which allocations are based. Need to determine ecological constraints using up to date survey information, constraints other than SSSI and LWS have not been considered in the evidence base. WWT do not accept the findings of the Sustainability Appraisal (SA); this may render Plan unsound. Strongly recommend evidence base for sites is updated and the quantum of development proposed is made acceptable in terms of biodiversity constraints before the Plan is finalised.

Option B appears a less harmful option but currently does not offer a sustainable solution to development at present.

Impact of proposed eastern relief road will be severe unless significant mitigation. A clear understanding of the need for the road and costs for mitigation are important considerations if a meaningful assessment of the two options are to be undertaken. Alternative access arrangements including improvement to existing network may be better.

Recommend sites in well defined geographical clusters be pulled together to form cohesive groups so that major developments are delivered using the Green Infrastructure led approach championed by Worcestershire Green Infrastructure Partnership. Recommend travelling showpeople proposed site at Heath Lane Stone not be taken forward due to nesting corn buntings in hedges on site.

Welcome specific targets for GI but query levels, SWDP sets 40% GI for sites over 1ha, recommend that this figure is re-examined in the emerging Local Plan.

WFDC should work closely with the Worcestershire Green Infrastructure Partnership to deliver an overarching Green Infrastructure Concept Plan to achieve best GI outcomes possible.

#### 4e) Petitions – Key Issues

A total of 6 petitions were submitted to the Council in relation to the plan. The petitions submitted are shown in the table below and includes the site it is in relation to.

Petition Group	Sites		Details
Burlish & Lickhill Friends	LI/2	Wyre Forest Golf Club	They spoke to 197 residents and submitted 64 response forms with this letter - the responses have been added as individual responses.
	LI/5	Burlish Crossing (Option B)	
	LI/6/7	Lickhill Road North	
Hodge Hill Farm	OC/5	Land at Husum Way	12 signatures



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Petition Group	Sites		Details
Residents Association	WFR/CB/7	Land off Birmingham Road	
Offmore and Comberton Action Group	OC/4	Baldwin Road	No signatures. Representing residents in the Offmore and Comberton Ward.
	OC/6	Land behind Offmore and Comberton	
	OC/13 (North)	Stone Hill North	
S.A.F.E. (Spennells Against Further Expansion)	AS/10	Rear of Spennells and Easter Park	Residents Group - no signatures. 692 members on Facebook plus 56 who are members by email.
	WFR/ST/2	Land off Stanklyn Lane	
	OC/13 (South)	Stone Hill South	
SALT (Summerfield Against Land Transformation)	AS/10	Fields between Spennells and Summerfield	No signatures - residents of Summerfield.
	WFR/ST/2 (South)		
Save the Green Belt	Cookley, Hurcott, Stone	North Worcestershire Green Belt	1773 signatures. This is an online petition in relation to the Green Belt around the villages in North Worcestershire. The signatures are a mix of local, national and international.

The following gives a summary of the key issues raised by the Petitions received:

**Burlish & Lickhill Friends:**

The Burlish & Lickhill Friends group are concerned with the following sites:-

- The field at the top of Kingsway, immediately adjacent to the nature reserve (L1/2)
- The field which runs parallel with Burlish Crossing and Bewdley Road North (L1/5)
- The area currently occupied by a garden centre and horse paddocks on Lickhill Road (L1/6/7)

The key concerns for these sites include; traffic congestion at Burlish Crossing, negative impact on wildlife and loss of Green Belt land. The group spoke to 197 people in these areas, the results being:

- 80 (40.5%) were completely unaware of any plans
- 95 (48%) had only recently become aware through social media, friends, neighbours, rumours
- 9 (4.5%) remembered seeing a WFDC leaflet
- 8 (4%) saw something in the Kidderminster Shuttle
- 10 (5%) remember a notification from the local councillor
- 1 (0.5%) saw a notice in the library
- 1 (0.5%) saw one of the fields being surveyed
- 184 (91%) expressed a concern for the plans to build on Greenfield sites
- 8 (4%) said they were not concerned (this figure includes 1 person who responded as “don’t know yet”).

**Hodge Hill Farm Residents Association:**

The residents of Hodge Hill Farm Barns object to the sites east of Kidderminster, which include Preferred Options OC/5 (Husum Way) and WFR/CB/7 (Land off Birmingham Road). Their reasons for objecting include:

- The extent of the proposals include a new Eastern By-pass from the A456 Birmingham Road to the A449 at the south of Kidderminster. This will cause a massive loss of amenity to the residents via noise, visual amenity, pollution and additional vehicle traffic.
- The Local Plan proposals are to build in Green Belt in Hurcott and around Hodge Hill Farm Barns (OC/4, OC/5, OC/6, WFR/CB/7), effectively becoming part of the town of Kidderminster. From the north passing to the east and south will be housing development culminating in a massive loss of Green Belt land.
- The land designated WFR/CB/7, over 7ha of prime agricultural land, sits alongside the Birmingham Road bordered to the east between Hodge Hill Nurseries and Hodge Hill Farm Barns. This is designated for a core employment use, i.e. industrial use.
- They believe the derelict brownfield sites – Sion Hill School, Sladen School, Swan Hotel / Working Men’s Club, Carpets of Worth, derelict factories and timber yard on Park Lane, the old Sarsons vinegar factory, Stourport Marina and plentiful sites on the A451 between Kidderminster and Stourport would be the correct areas to use for core mixed use sites and bring welcome regeneration and potential jobs to the community.
- The group claim that there are currently employment sites within the District that are underused and contain prime areas for re-development. These include the following:
  - Hoo Farm Industrial Estate
  - Hoo Brook Industrial Estate
  - Easter Park
  - Green Hills Industrial Estate
  - Rushock Industrial Estate
  - Lea Castle Hospital site
  - Former Forest Glades site and surrounding medical centre – ideal for mixed use.
- The use of WFR/CB/7 would not enhance the landscape and setting, neither would the use of OC/5 for housing. This would deprive everyone of the pleasant views across this rolling land with the hills beyond. This would constitute a severe loss of amenity.
- Hurcott and Podmore pools and Hurcott Woods is an area of Significant Scientific Interest (SSI). Noise, visual intrusion and pollution of developments in and around Hurcott village would have a negative environmental impact.
- Sufficient investigation of brownfield sites throughout the District has not been considered properly.

**Offmore and Comberton Action Group (OCAG-LP):**

The OCAG-LP represents residents across the Offmore Comberton Ward of Wyre Forest District. The group believe that there should be a presumption that major future development should have the aim of creating sustainable communities of a size capable of supporting, at least, its own Primary School, village centre with shops and community facilities, if possible some live work units and adequate recreational facilities, and not simply be an “add on” to existing communities.

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The group object to the “Core Site” allocation of land to the east of Baldwin Road, the Offmore and Comberton estates and land behind properties on the A448 Comberton Road within the Kidderminster Town boundary.

The group object for the following reasons:-

- The Green Belt to the east of Kidderminster plays a vital part in separating the town from the West Midland Conurbation.
- The land in question includes Grade 2 Agricultural Land. With the uncertainty surrounding food prices post Brexit it is vital that such land is kept available for food production.
- There are endangered bird species: Corn Buntings, Yellow Hammers, Skylarks and Lapwings are present in this land. As well as the birdlife there are foxes, badgers, rabbits, muntjac and roe deer present across the area.
- Development of land behind Baldwin Road would be a serious visual incursion into the Green Belt and would impact on wildlife habitats on the buffer zones for the Hurcott and Podmore SSSIs.
- An Eastern by Pass would have to be built from the Wolverhampton Road to the Worcester Road to be of any use as anything shorter would cause roads around Hurcott Road / Birmingham Road to be used as rat runs.
- A linear development to the east of Kidderminster would not be a sustainable community. It would have no community “heart” and would not accommodate a neighbourhood centre.
- Offmore Primary School is full, is on a restricted site and can’t be extended.
- Land to the rear of Offmore and Baldwin Road is considerably higher than the rest of the area so development would be very visible.
- Drainage of the land to the rear of the existing Offmore estate is extremely poor.
- Hurcott Lane and the narrow extension of Hurcott Road into Hurcott Village are extremely dangerous roads with far too frequent serious road traffic accidents. Any development of land to the rear of Baldwin Road would have to somehow incorporate the existing Hurcott Lane / Birmingham Road junction.
- Industrial development at Hodge Hill would also need a by pass to avoid congestion.

The group have proposed an alternative suggestion at Lea Castle; the creation of a “sustainable village”. They propose extending the area of Lea Castle to include not only Options A and B but also extending the site to use the land up to the Wolverhampton Road and, at the rear of the Lea Castle site, extending the site up to Axborough Lane as well as across to the Stourbridge Road. This would provide an additional 37.73 hectares of land that could be brought into the Lea Castle site in this way.

They also believe that there might be a possibility of some development on the western side of Wolverley Road towards Sion Hill to link with development at the Sion Hill Middle School site.

They consider that the advantages to their proposal are as follows:-

- With the additional land at Lea Castle and including sites in that vicinity already identified by WFDC, including Hurcott ADR, they believe a sustainable community of around 2,000 – 2,500 houses could be created.
- It would be large enough to support a 2 form entry Primary School.
- It would support a village shopping centre and potentially some employment land.

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- It would support a village centre which whilst within Cookley Parish would not produce a burden on that community.
- It would be capable of sustaining a bus service.
- It would potentially be able to provide live-work units.
- It would be within the catchment of Wolverley CE High School and would positively impact on the school's long term viability.

To conclude, the group believe that their alternative suggestion will create viable and sustainable communities, protect valuable, productive farmland, and preserve endangered bird species and other wildlife.

### **S.A.F.E. (Spennells Against Further Expansion):**

Spennells Against Further Expansion (SAFE) is an association of residents and friends of Spennells fields, formed in June 2017. They have 692 members on their Facebook group, plus another 56 who signed up on email only.

SAFE oppose the proposed development of the fields adjacent to the Spennells estate, packaged as Option A in the Draft Local Plan. These Green Belt fields are 'Rear of Spennells & Easter Park (AS/10)', 'Land off Stanklyn Lane (WFR/ST/2)' and 'Stone Hill South (OC/13)'. In addition, the group oppose development upon the area described as 'Captain's and the Lodge (WFR/ST/1)' which has been included in the Draft Plan as a 'Core' area.

The main issues they raise are as follows:-

- The OAHN figure is too high. The need to use any Green Belt land is unnecessary.
- The group are against the proposal for the 'Eastern Relief Road'. Their reasons for not supporting this proposal include the following comments:
  - No definitive route or traffic model has been provided for this proposal, meaning that local residents are not being provided with sufficient details to make an informed judgement.
  - The idea that this would create the means for traffic to by-pass Kidderminster en-route to Birmingham or the M5 is misleading since the A450, less than 2 miles to the east, already provides this facility. Improving the A450 would provide relief to any congestion on the A449, without bringing increased air, light and noise pollution to the already heavily populated Spennells estate.
  - An Eastern Relief Road would not help to regenerate Kidderminster since any regeneration is desperately needed within the run-down town centre, not on the outskirts on Green Belt land.
  - A new road would create a whole series of dangers, hazards and disadvantages to local residents and wildlife. It would cause catastrophic effects by crossing existing wildlife corridors, i.e. Spennells Valley Nature Reserve and its green corridors.
- The Spennells fields are productive agricultural land which also serves as a popular recreational and social facility for walkers, joggers, cyclists, dog walkers, photographers and horse riders. There are a number of well-used Public Rights of Way and bridleways across the fields which allow fast and easy access to the open countryside.
- The area offers a number of different habitats for wildlife, including important nesting sites for corn buntings, larks and linnets (all of which are included on the red list as endangered

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birds), badger setts and bats. The rare Tower Mustard Plant also thrives along the lanes adjoining Stanklyn Lane.

- Negative impact on the visual landscape in this area. The landscape around Spennells is an important part of people's lives, offering a wide variety of benefits in terms of quality of life, well-being and economic opportunity.
- Issues with drainage, flooding and loss of prime grade 2 agricultural land.
- Increased demand on infrastructure including medical facilities and schools.
- Social problems arising from increasing the size of the estate; evidence exists that large housing estates suffer more crime and anti-social behaviour.
- A new large residential development requires proper infrastructure to support its current and future residents. The group find no evidence of future funding to support this. In particular, they are concerned with: hospital services, GP & Dental surgeries, Schools, local shops, pharmacy and post office, local leisure such as a village hall, pub, and fitness centre/gym, traffic congestion on local roads.
- Loss of Green Belt land. Brownfield regeneration must take priority over the development of Green Belt land.
- Kidderminster town centre has at least 40 large shops and office blocks that stand empty, some for well over a decade. The town centre is in urgent need of regeneration; Compulsory Purchase Orders should be made on some of the larger shops that stand no chance of ever being filled due to their size.
- WFDC could request Government action in order to encourage Developers in the local area who have been given planning permission to build houses within a reasonable timeframe, not just to sit upon Land Banks for speculative purposes e.g. Cheapside in Stourport (AKR/2) and Sladen School.

### SAFE group conclusions:

The SAFE group object to Option A. Of the two choices proposed in the draft Local Plan they would choose Option B because:-

- Less Green Belt land would be used.
- Ability to build a greater number of houses in areas where they are needed for local expansion.
- The dispersed nature of the development would result in less pollution and less strain upon Kidderminster's existing infrastructure which is already struggling to cope. This would spread the development more evenly around Wyre Forest, serving the needs of expanding local communities by creating the potential for more housing development, but without concentrating the development to the detriment of the Green Belt cushion between the Wyre Forest and the West Midlands conurbation.

However the SAFE group make the following suggestions for alternative proposals:-

### Suggestion 1:

- Phase 1 (first 5 years): Use existing empty properties in the town centre e.g. Woolworths site for a leisure complex (cinema/bowling alley) and ideally the adjacent ex-Littlewoods building for a multi-storey car park. The remaining Lionfields site could then all be dedicated to housing/residential; plus other brownfield sites such as the Churchfields site. The group

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suggested that if Worcester Street was not returned to through traffic, the Council would immediately save £500,000 of taxpayers' money to purchase the vacant Woolworths building.

- Phase 2 (5-10 years): Use Lea Castle hospital site (brownfield site) for 600-700 houses.
- Phase 3 (after reviewing housing need (10-15 years): Lea Castle Hospital and School site – use of Green Belt extension if absolutely necessary. Green Belt at Lea Castle only released at this stage if deemed necessary for increased housing.

### Suggestion 2:

- Development of an entire rural village on Lea Castle Hospital and School site.

### **Summerfield Against Land Transformation (SALT):**

The Summerfield Against Land Transformation (SALT) has been set up by a group of residents from the Summerfield area.

The key issues raised by the SALT group are as follows:-

- The Council should never again conduct such an important consultation exercise over the course of the summer months. This suggests a cynical attempt to compound citizen disadvantage.
- There is clear bias contained within the draft Local Plan, to the extent that Option A is portrayed as the only real choice.
- Given the scale of the proposed development, thought must be given to the key educational and health services to support the residents of the new housing stock. This will require an expansion of existing schools and the creation of a new health centre/GP practice.
- The SALT group reject the hierarchy of settlement argument as unfair and disproportionate; a fairer and more imaginative approach is required.
- The group accept and support the need for infrastructure development to reflect the ambition of the Local Plan. However, they see the draft Local Plan being cynically manipulated – via Option A – to justify the Eastern Relief Road, resolve pre-existing problems and to attract capital funding.
- The group encourage the Council to give a higher priority to stimulating the local economy (push strategy) and a more balanced approach to housing (pull strategy).
- The group believe that the OAHN study to be a deeply flawed piece of work and that the projected level of growth in housing need to be an unsafe basis for the Plan.
- The Option A proposal will damage irrevocably the social amenity of and biodiversity in the fields which separate The Spennells and Summerfield and undermine the integrity and unique identity of the Summerfield community.
- The SALT group accept the need for housing but reject the use of Green Belt land in favour of brownfield sites and in this regard, require the Council to show more ingenuity and resist developer preference for 'easy' sites.

## **5) Responses to Preferred Options Policies**

The following tables and graphs show the level of support, objection or comments that the Council received for each of the policies within the Preferred Options consultation document. Summaries of responses to each section of the document can be found at Appendix 2.

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Summary of Consultation Responses

### Sections 1-4

These sections of the document did not contain any policies. These sections are:

1. Introduction and Context
2. Key Issues and Challenges
3. Vision for the Area in 2034
4. Core Policies Introduction

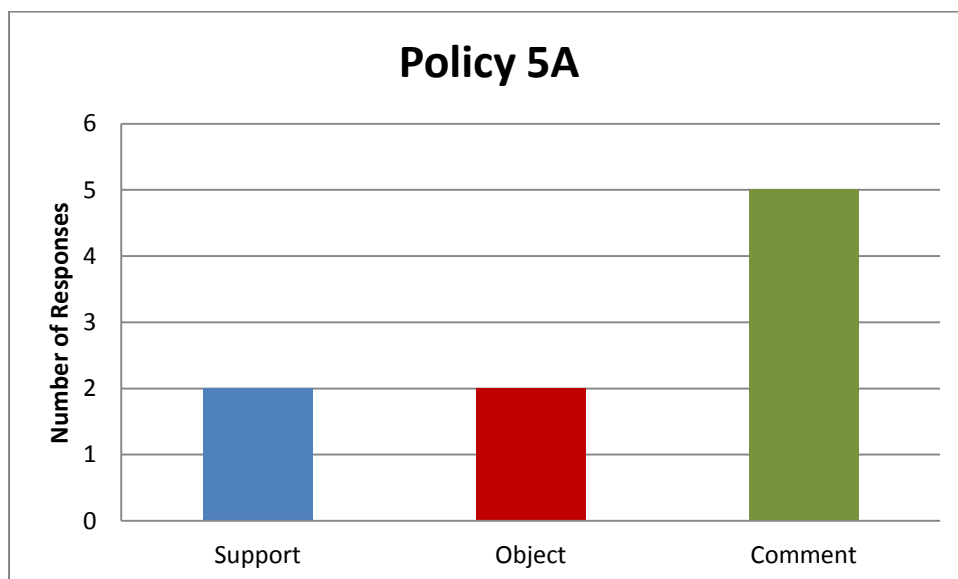
A summary of the responses received and Officer Comments for these sections can be found at Appendix 2 of this document.

### Section 5 - Overarching Sustainable Development Principles

The policies contained within this section are:

- Policy 5A – Sustainable Development

The following graph indicates the level of support, objection or comments received for the policies within Section 5.



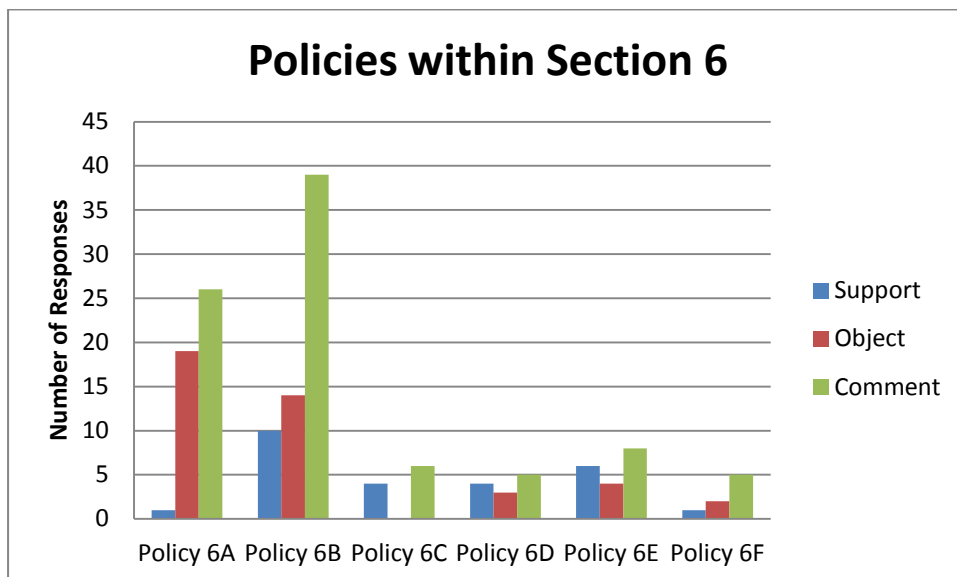
A summary of responses and Officer Comments for Section 5 can be found at Appendix 2 of this document.

### Section 6 - A sustainable Future – Development Strategy

The policies contained within this section are:

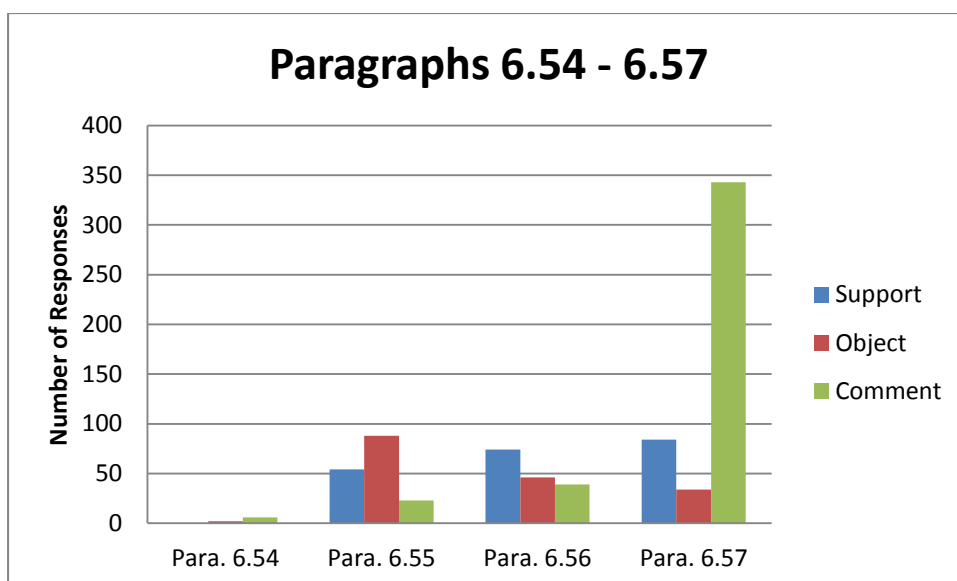
- Policy 6A - Development Needs 2016-2034
- Policy 6B – Locating New Development
- Policy 6C – Kidderminster town as the strategic centre of the District
- Policy 6D – Kidderminster Urban Extensions
- Policy 6E – Role of Stourport-on-Severn and Bewdley as Market Towns
- Policy 6F - Role of the villages and rural areas

The following graph indicates the level of support, objection or comments received for the policies within Section 6.



In addition to the policies above, many responses were received to the consultation questions asked in paragraphs 6.54 – 6.57:

- **6.54** Do you prefer Option A or Option B? On what planning grounds?
- **6.55** Option A has the associated benefits of enabling the delivery of critical infrastructure including the Kidderminster Eastern Relief Road which will also reduce Kidderminster Town Centre traffic congestion and improve traffic volumes in the adjacent estates. It will enable more effective school provision. Do the benefits of this outweigh the disadvantage caused by the large-scale of expansion to the east of Kidderminster that would be necessary?
- **6.56** Whilst Option B removes slightly less land from the Green Belt it disperses development more widely across the District. Consequently it will not support the implementation of a Kidderminster Eastern Relief Road and the provision of sufficient, appropriately located education facilities will be more problematic. The absence of this additional infrastructure to support new development will impact on future traffic congestion, air quality, and educational provision in Wyre Forest. Do you consider the benefits of a more dispersed strategy outweigh these disadvantages?
- **6.57** Are there any other alternative Options you would like to suggest?





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Summaries of these responses and the key issues raised by respondents, together with Officer Comments, for paragraph 6.54 – 6.57 can be found in Appendix 2.

### Paragraph 6.57 Alternative Options

The table below lists the alternative sites suggested:

Additional Sites Suggested	Officer Comments
<b>Kidderminster</b>	
Kidderminster Town Centre	Large numbers of residential flats have been provided on upper floors of town centre buildings in recent years, especially in the Worcester St/Oxford St area. Plans are underway to convert the vacant upper floors of Tower Buildings in Blackwell St into flats.
Crown House	Demolition of this building is expected during late 2018/19. A temporary car park will be provided whilst plans are drawn up for the site. Some residential uses may be possible on upper floors depending on what proposals are put forward.
Job Centre, Mill Street	These modern offices remain vacant following relocation of the job centre to the library building. If marketing fails to find a new office occupier, they could come forward for a residential conversion under Prior Notification rules.
Former Glades Leisure Centre	Plans are well-advanced to bring a leisure use onto this cleared site.
Ceramaspeed Factory	This building is being partially redeveloped to raise the roof height in order to attract a new employment use.
Old Law Courts Worcester Street	This building has recently been listed Grade II. Potential uses being considered include residential conversion.
Rear of Ferndale Estate	This Green Belt site has been promoted for housing development but ruled out as it would intrude into a very open rural landscape where it would be hard to define a robust defensible boundary. This part of town is also further away from key services and transport facilities.
New Road	Several sites along New Road have recently been converted or redeveloped for residential uses.
Woolworth Building	This empty building should be retained for retail uses and ground floor but would be suitable for residential uses at upper floors.
Littlewoods Building	There are plans to relocate Sports Direct and a gym to this site. This will help to regenerate this part of town.
Blackwell Street (empty shops)	Plans are in place to convert Tower Buildings to residential uses on the upper floors. It is anticipated that this will help to kick-start refurbishment in other buildings.
Harriers Ground, Hoo Road	This site would be suitable for residential redevelopment if a suitable and viable scheme was proposed for the stadium and associated facilities to relocate elsewhere within the town.
Industrial Estate at Aggborough	There are a small number of reasonably modern premises at Stadium Close which will be retained in employment use.
Park Lane	A number of sites on Park Lane are being considered for redevelopment to residential uses including the timber yard, the cleared site of The Parkers Arms and some of the land opposite.
Worcester Street – Redevelop	Worcester Street is planned to be reopened to traffic in one direction with additional on-street parking. It is hoped that this will further revive the street. Any proposals to redevelop

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Additional Sites Suggested	Officer Comments
	/convert empty shop units will be assessed on their merits. Much of the eastern end of the street has been converted to residential uses on upper floors / to the rear.
Horsefair – Redevelop	There are approvals in place for more residential units on upper floors. Potential uses for the former Post Office site are also being explored.
Green Street	It is proposed to allocate the empty Boucher Building for residential use. Frank Stone building is better suited to an employment use. Elgar House has been refurbished for offices and the residential approval is no longer being implemented.
Meadow Mill Industrial Estate	This is a thriving industrial estate and will be retained for employment.
King Charles 1 School	Previous proposals to relocate the school to the Borrington Road site would have seen this site come forward for residential use. Building Schools for the Future Funding ceased and this was not taken forward. It is agreed that the Comberton Road site would be suitable for residential use if in the future the school decided to relocate.
Sion Hill School	A planning application has been received for residential redevelopment for housing.
Sladen School	This site is currently allocated for redevelopment with a mix of family dwellings and supported housing the most likely end use.
Churchfields	An application for redevelopment of this site for up to 270 dwellings has been received.
Rear of The Range, Crossley Park	This piece of land is not considered suitable for housing. Access is required through the site by the Environmental Agency for flood bund maintenance.
Former Brinton Golf Driving Range, Stourport Road	This site is part of the Outdoor Sports Allocation and is in the Green Belt. It is adjacent to the Finepoint Business Park and is not considered a suitable location for housing.
Low Habberley	This large expanse of open Green Belt land stretches up towards Trimpley and it would be hard to define a firm defensible new Green Belt boundary at this location. However, the smaller parcel adjacent to High Habberley could be brought forward for limited development and a robust boundary could be created using existing hedgerows.
Former Sealine Worcester Road	This complex of buildings is now reoccupied by employment uses. It is part of the Worcester Road Employment Corridor.
Debenhams, Weavers Wharf	This building is fully occupied by retail at lower floors with a hotel on upper levels.
Kidderminster Golf Club	This land is occupied by the golf club and has not been put forward for redevelopment by the Club.
Lionfields	This site is allocated for a mix of town centre uses including residential uses.
Silverwoods	Further residential uses are proposed on this site on the Stourport Road frontage (extra-care apartments) with more housing towards the rear of the site adjacent to existing dwellings. Other parcels will be retained for employment uses.
Severn Grove	This site is currently allocated for redevelopment. This allocation will be taken forward into the next Local Plan.
Rock Works, Park Lane	This site is proposed as an employment allocation to conversion to workshops. It is not considered suitable for residential use

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Additional Sites Suggested	Officer Comments
	owing to its lack of natural daylight.
Victoria Carpets	The former sports ground has approval for residential development.
Weavers Wharf, canal side.	This location should be retained for commercial uses.
Timber Yard, Park Lane	The former timber yard will be allocated for a residential –led scheme.
Easter Park	This location is not considered suitable for residential development. It is zoned for employment.
Corner of Coventry Street / Blackwell Street	Tower Buildings has approval for residential use on the upper floors
Lad adjacent to Hoo Farm and Industrial Estate and Summerfield	This site is allocated for employment uses and may be released for development beyond the plan period.
Adjacent to Ceramaspeed	This site is proposed as a site for travelling showpeople.
Old Medical Hall, Bull Ring	The building is proposed for residential conversion.
Vicar Street, above shops	Approvals are in place for residential conversion .
The old Riverboat building Blackwell Street	Approvals are in place for flats to be provided in Tower Buildings.
Land South of Bernie Crossland Walk	A ransom strip is likely to prevent this Greenfield site coming forward for development .
Land North of Bernie Crossland Walk	A ransom strip may prevent this Greenfield site coming forward for development
Chester Road Service Station	Approval is in place for residential redevelopment of this site.
Land at 78 Cherry Orchard	Approval is in place for residential redevelopment of this site.
Comberton Place	Residential redevelopment of this site is underway.
Lea Street School	It is proposed to allocate this site for residential development.
Form Polish Club	Approval is in place to convert this site for residential use.
Rear of McDonalds Hoo Brook	This area is not considered suitable for residential use.
Swan Centre	This building should be retained for retail use.
Selba Drive - Objections	This site should be retained as open space.
<b>Stourport-on-Severn</b>	
Parsons Chain	This site is currently allocated for mixed uses. It is proposed to allocate the site for a mix of employment and C2 uses (care home).
Burlish Park Golf Course	This site is currently in the Green Belt. It is proposed to release part of the land to the south of Kingsway for housing and retain the rest for informal recreation.
Land at Astley Cross	Land at Astley Cross is mostly outside of the District boundary. It is not considered suitable due to adverse landscape impact.
Stourport High School surplus land	It is proposed to allocate part of this site for residential redevelopment.
Carpets of Worth	This site is currently being marketed for housing development and is expected to come forward in the next few years.
Bridge Street	A residential proposal is being drawn up for the former Lloyds Garage site.
Queens Road	This site is allocated for redevelopment and a scheme will be brought forward in the next few years.
Yew Tree Walk	This Green Belt site is expected to be brought forward for residential development through the Local Plan.
Former Leisure Centre	Much of this site is within the flood zone and is not considered suitable for residential development.

Appendix 4 - Summary of Consultation Responses to the Local Plan Review  
Preferred Options (Reg 18) Consultation (June 2017)

<b>Additional Sites Suggested</b>	<b>Officer Comments</b>
Land off B4195 Bewdley to Stourport opposite Cooks Nursery	This site has been ruled out for development due to capacity issues with Burlish Crossing junction.
<b>Bewdley</b>	
Grey Green Lane	Part of this Green Belt site could potentially be brought forward in the future if access could be secured via the former school site on Shaw Hedge Road.
South East of Highclere	Site not considered suitable for development due to biodiversity, landscape and hydrological issues.
Workhouse, High Street	This site is expected to come forward for a small residential scheme shortly .
Dog Lane	Any proposals for infill development will be assessed on its merits.
Fire Station, Load Street	This site will be allocated for residential development with no habitable rooms at ground floor level.
Bridge House and Rowing Club	Access to these sites is not ideal. Land also in flood zone.
Ribbesford House	This Grade II* building has recently been sold.
Retail units, Bewdley	Any unused upper floors would be suitable for conversion.
Adjacent All Saints Church, Wribbenhall	This land will be allocated as open space with a pedestrian /cycle link opened up alongside Riddings Brook. Residential development is not suitable – impact on setting of Church, flooding.
Land between New Road and The Heath Hotel	The area known as The Gardens is proposed for allocation for up to 35 dwellings.
Field between Blackstone car park and the Leisure Centre	Green Belt site not considered suitable as partially in flood zone. Development would impact on views into Conservation Area and open landscape.
HSBC Bank, Load Street	Residential conversion of upper floors would be acceptable
Bunkers Hill	This land is part of the Safari Park and has a permission for a water park, hotel and conference centre.
<b>Rural and Villages</b>	
Extended Lea Castle, Cookley	It is intended to develop the wider area around the former hospitable as a sustainable village complete with school, shop, community facilities, employment, sports facilities and up to 1400 dwellings.
Kimberlee Avenue, Cookley	This site will be brought forward via the Neighbourhood Plan.
Wolverley High School	This land should be retained as playing fields for the high school. Development would have adverse impact on Conservation Area. Not considered to be a sustainable location for large scale housing development.
Former Army Hospital, Brown Westhead, Wolverley	Development would have adverse impact on setting of Canal Conservation area and nearby heritage assets.
Quarry opposite Brown Westhead Park, Wolverley	This site is not considered suitable to residential development as landscape is one of scattered wayside dwellings.
Bliss Gate Inn	Proposals have been drawn up for redevelopment of this site.
Blakedown	Station parking is being proposed at Blakedown as part of Network Rail's plans which also include proposals to extend the platform length to cater for longer trains so that more services can call at the station. A site will be allocated through the Local Plan for a station car park. The housing needs survey undertaken as part of the neighbourhood plan also showed a housing need

Appendix 4 - Summary of Consultation Responses to the Local Plan Review  
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Additional Sites Suggested	Officer Comments
	within the parish and it is expected that a suitable housing site will need to be brought forward during the plan period or through the neighbourhood plan process.
Chaddesley Corbett	A small site is proposed for allocation in the village.
Wolverley	Sites are proposed for allocation in Farifield to be brought forward via a neighbourhood plan.
Land at Callow Hill	The settlement boundary will be slightly amended to allow for small infill plots to come forward.
Mustow Green	This area is washed over Green Belt and not considered suitable for further residential development as there are few facilities
All Rural Villages	A number of small allocations to meet local need are proposed. Those in Fairfield and Cookley will be brought forward via a Neighbourhood Plan.
Land between Kidderminster and Wolverley (B4190)	It is important to retain a green gap between the settlements and keep their separate identity.

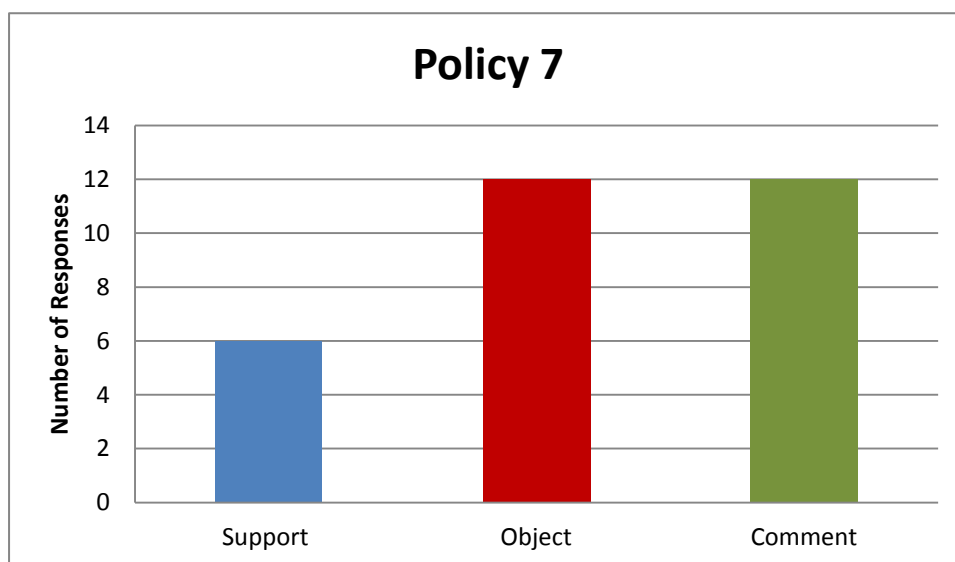
A summary of responses and Officer Comments for Section 6 of the Preferred Options document can be found at Appendix 2.

### Section 7 – A Strategic Green Belt Review

The policies contained within this section are:

- Policy 7 - Strategic Green Belt Review

The following graph indicates the level of support, objection or comments received for the policies within Section 7.



A summary of responses and Officer Comments for Section 7 can be found at Appendix 2 of this document.

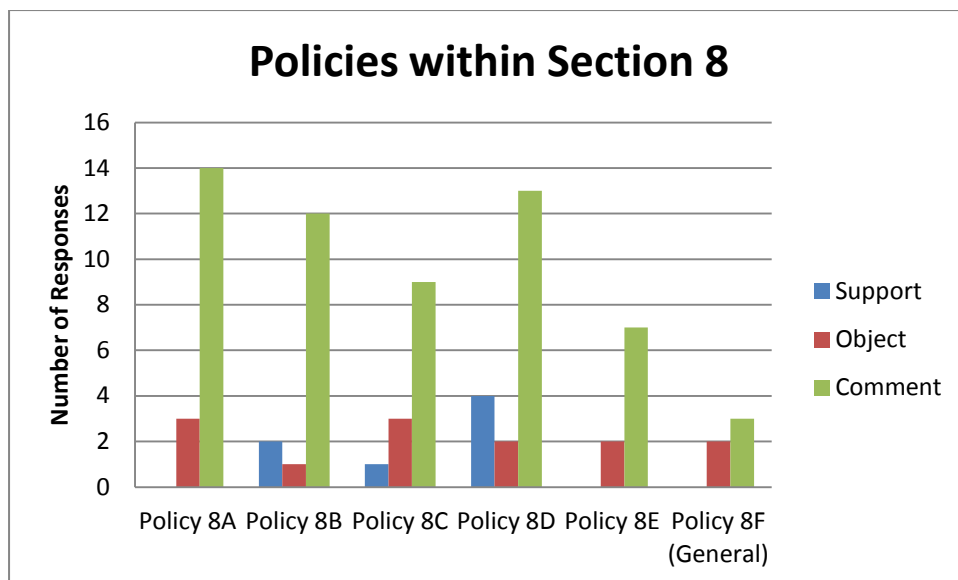
### Section 8 – A Desirable Place to Live

The policies contained within this section are:

## Appendix 4 - Summary of Consultation Responses to the Local Plan Review Preferred Options (Reg 18) Consultation (June 2017)

- Policy 8A - Housing Density & Mix
- Policy 8B - Affordable Housing Provision
- Policy 8C - Addressing Rural Housing Needs
- Policy 8D - Specialist Housing Requirements
- Policy 8E - Gypsy and Traveller Site Provision
- Policy 8F - Site Provision for Travelling Showpeople

The following graph indicates the level of support, objection or comments received for the policies within Section 8.

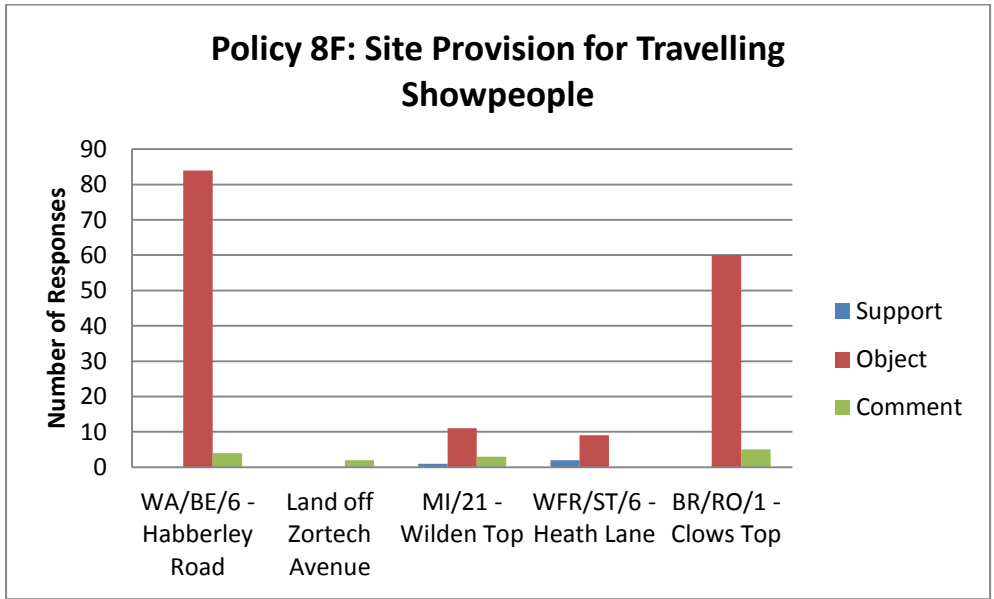


Policy 8F sought provision of a site for Travelling Showpeople. The table below details the number of responses received to the sites suggested:

Site Ref	Site description	Support	Object	Comment
<b>Policy 8F</b>	-	0	2	3
<b>Travelling Showpeople Sites</b>				
WA/BE/6	Land off Habberley Road, Bewdley	0	85	4
	Land accessed from Zortech Avenue, Kidderminster	0	0	2
MI/21	Land within Wilden Top Area of Development Restraint, Wilden	1	11	3
WFR/ST/6	Land at Heath Lane, Stone	2	9	0
BR/RO/1	Land at former Clows Top Garage, Clows Top	0	60	5

Appendix 4 - Summary of Consultation Responses to the Local Plan Review Preferred Options (Reg 18) Consultation (June 2017)

The following graph indicates the level of support, objection or comments received for the proposed Travelling Showpeople site allocations.



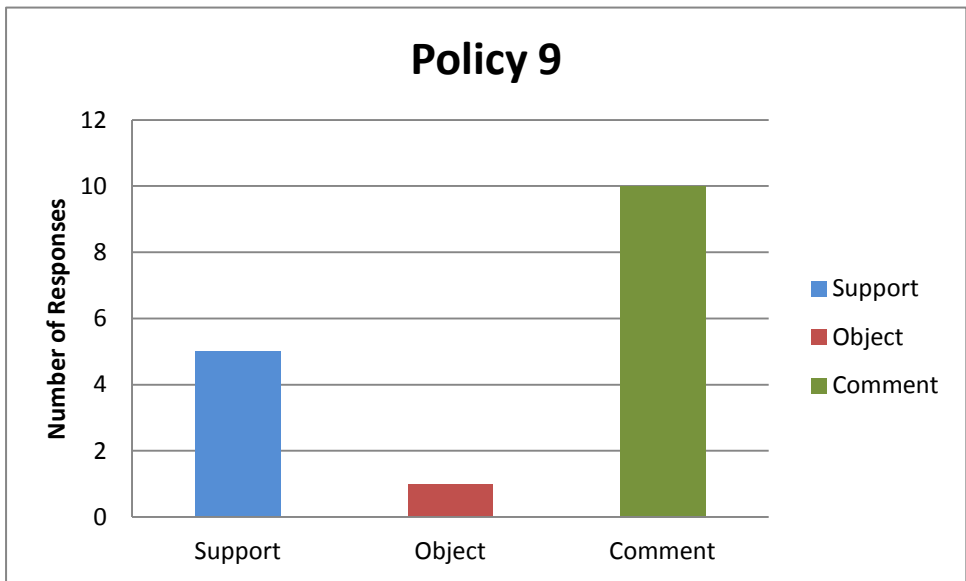
A summary of responses and Officer Comments for Section 8 can be found at Appendix 2 of this document.

**Section 9 Health**

The policies contained within this section are:

- Policy 9 -Health and Well Being

The following graph indicates the level of support, objection or comments received for the policies within Section 9.



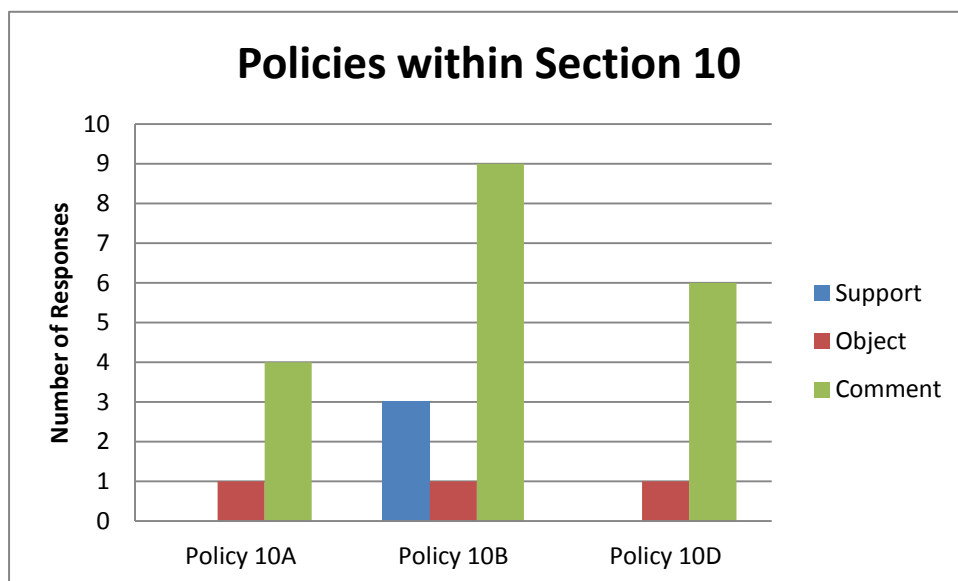
A summary of responses and Officer Comments for Section 9 can be found at Appendix 2 of this document.

### Section 10 – A Good Place to do Business

The following policies are contained within this section:

- Policy 10A - A Diverse Local Economy
- Policy 10B - Town Centre Development
- Policy 10D - Sustainable Tourism

The following graph indicates the level of support, objection or comments received for the policies within Section 10.



A summary of responses and Officer Comments for Section 10 can be found at Appendix 2 of this document.

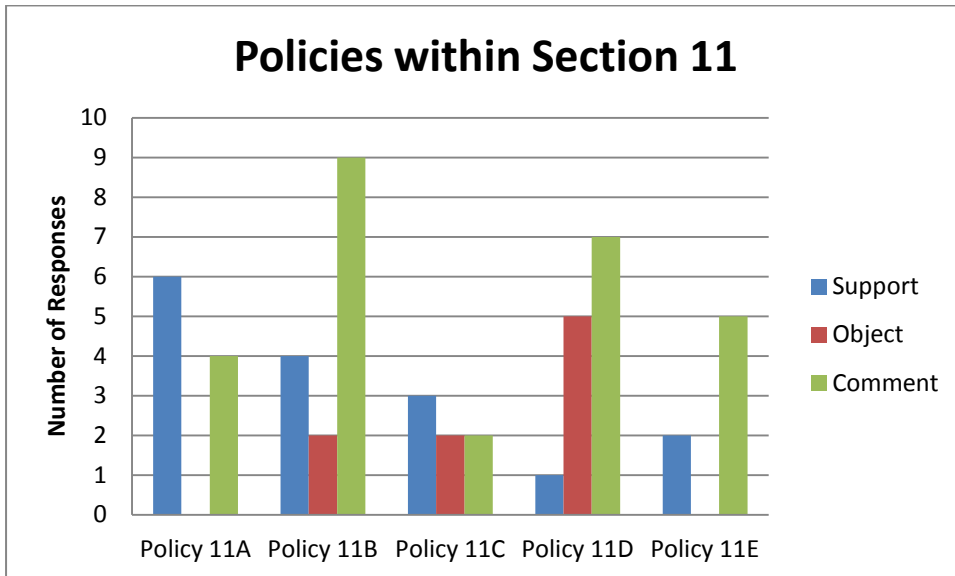
### Section 11 – A Unique Place

The policies contained within this section are:

- Policy 11A - Quality Design and Local Distinctiveness
- Policy 11B - Historic Environment
- Policy 11C - Landscape Character
- Policy 11D -Protecting and Enhancing Biodiversity and Geological Conservation
- Policy 11E - Regenerating the Waterways

The following graph indicates the level of support, objection or comments received for the policies within Section 11.





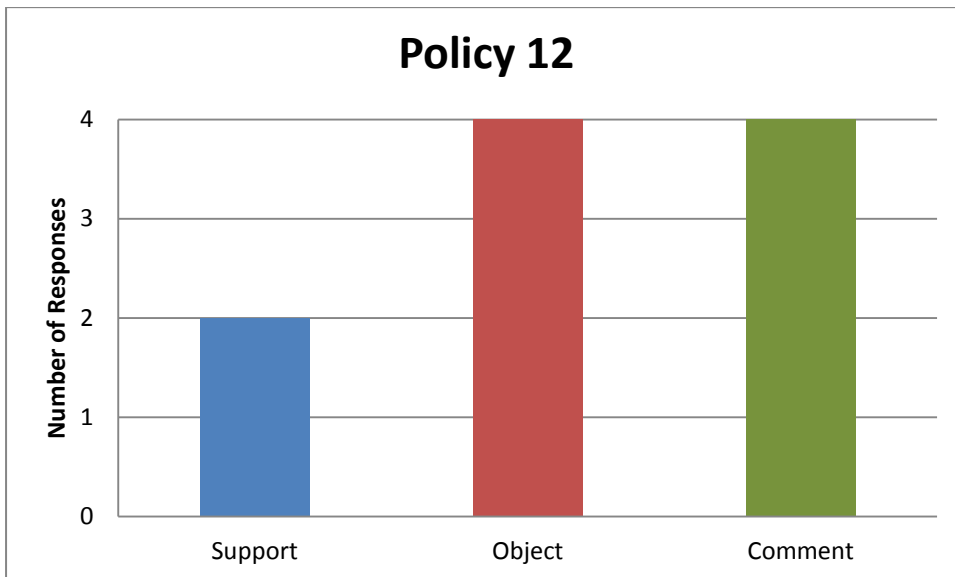
A summary of responses and Officer Comments for Section 11 can be found at Appendix 2 of this document.

### Section 12 – Strategic Infrastructure

The policies contained within this section are:

- Policy 12 - Strategic Infrastructure

The following graph indicates the level of support, objection or comments received for the policies within Section 12.



A summary of responses and Officer Comments for Section 12 can be found at Appendix 2 of this document.

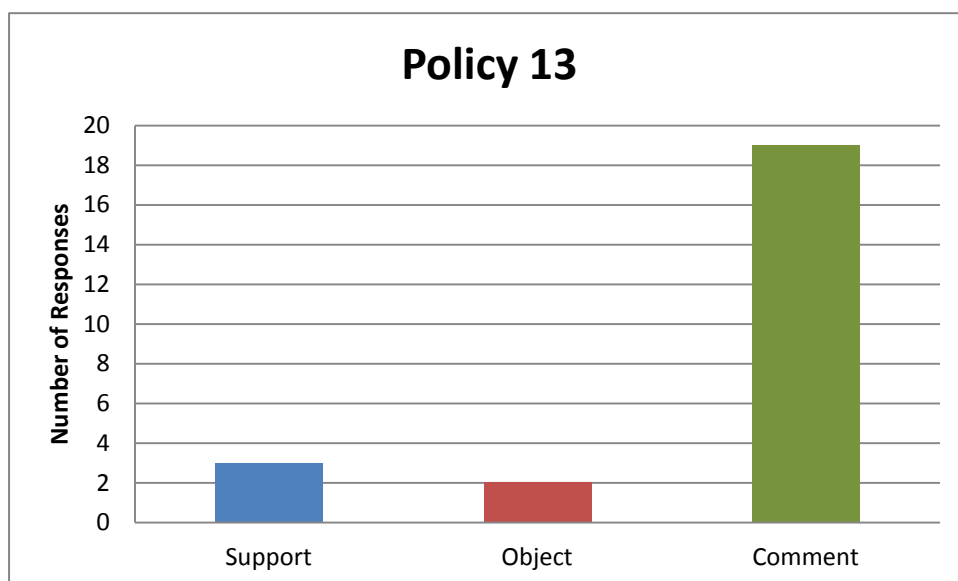
### Section 13 – Transport and Accessibility

The policies contained within this section are:

- Policy 13 - Transport and Accessibility in Wyre Forest

## Appendix 4 - Summary of Consultation Responses to the Local Plan Review Preferred Options (Reg 18) Consultation (June 2017)

The following graph indicates the level of support, objection or comments received for the policies within Section 13.



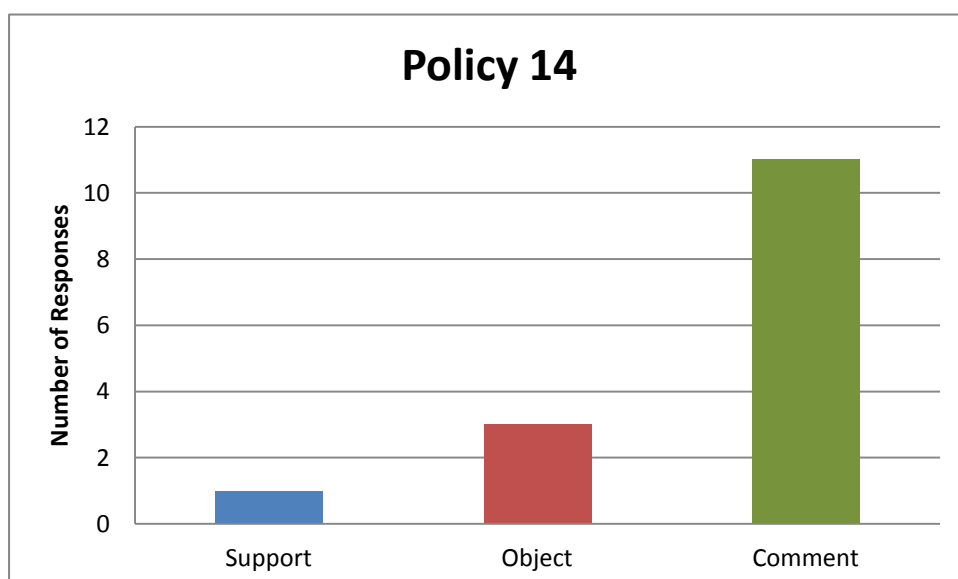
A summary of responses and Officer Comments for Section 13 can be found at Appendix 2 of this document.

### Section 14 – Strategic Green Infrastructure

The policies contained within this section are:

- Policy 14 - Strategic Green Infrastructure

The following graph indicates the level of support, objection or comments received for the policies within Section 14.



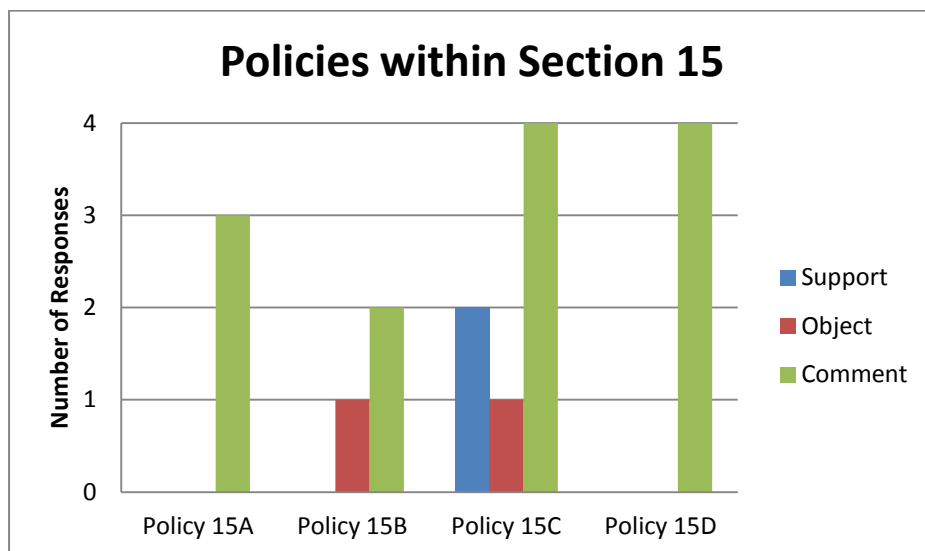
A summary of responses and Officer Comments for Section 14 can be found at Appendix 2 of this document.

### Section 15 – Water Management

The policies contained within this section are:

- Policy 15A - Water Conservation and Efficiency
- Policy 15B - Sewerage Systems and Water Quality
- Policy 15C - Flood Risk Management
- Policy 15D - Sustainable Drainage Systems (SuDS)

The following graph indicates the level of support, objection or comments received for the policies within Section 15.



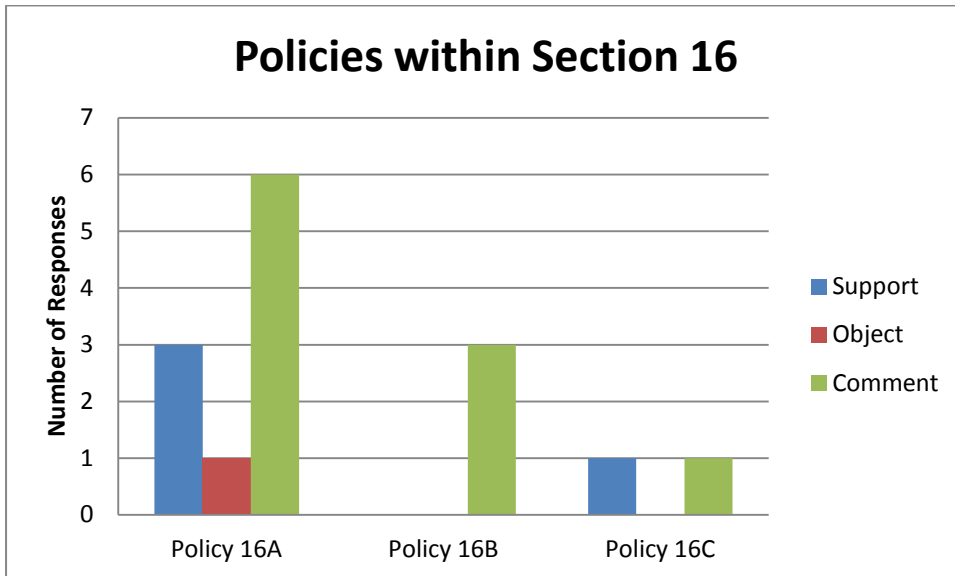
A summary of responses and Officer Comments for Section 15 can be found at Appendix 2 of this document.

### Section 16 – Pollution, Minerals and Waste

The policies contained within this section are:

- Policy 16A - Pollution and Land Instability
- Policy 16B - Minerals
- Policy 16C – Waste

The following graph indicates the level of support, objection or comments received for the policies within Section 16.



A summary of responses and Officer Comments for Section 16 can be found at Appendix 2 of this document.

### Section 17 – Development Management Introduction

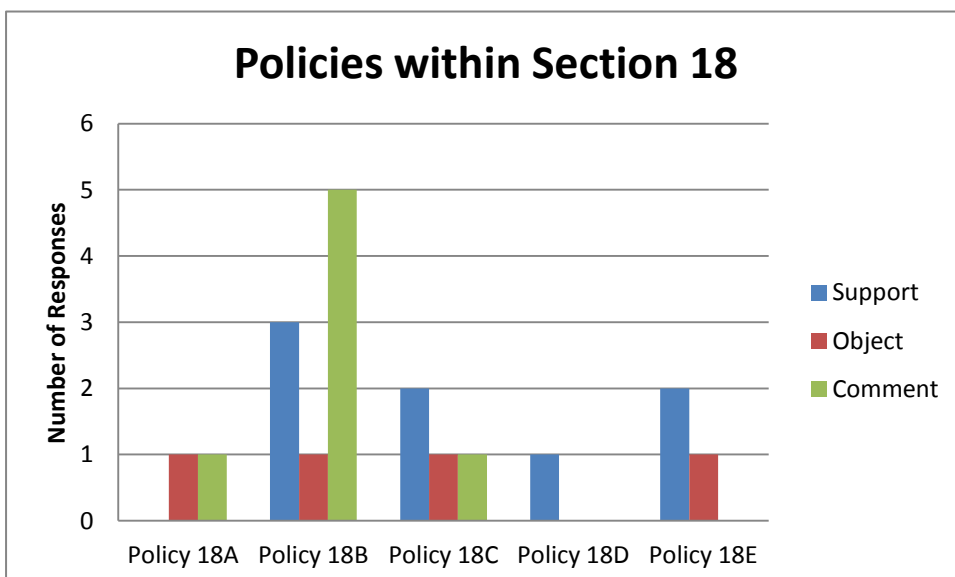
No responses were received to Section 17 of the document.

### Section 18 – A Desirable Place to Live

The policies contained within this section are:

- Policy 18A - Financial Viability
- Policy 18B - Residential Infill Development
- Policy 18C - Space Standards for New Residential Developments
- Policy 18D - Flat Conversions
- Policy 18E - Residential Caravans and Mobile Homes

The following graph indicates the level of support, objection or comments received for the policies within Section 18.



## Appendix 4 - Summary of Consultation Responses to the Local Plan Review Preferred Options (Reg 18) Consultation (June 2017)

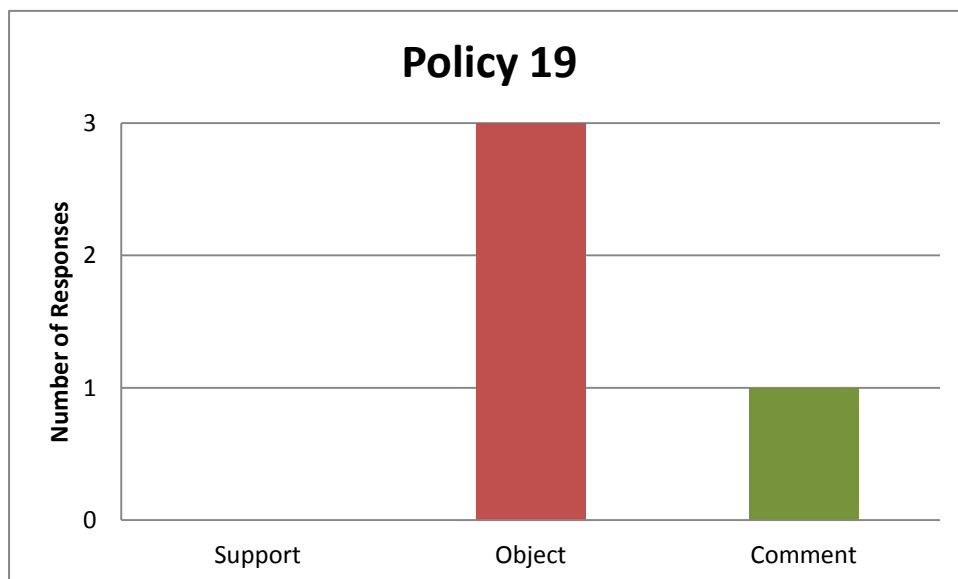
A summary of responses and Officer Comments for Section 18 can be found at Appendix 2 of this document.

### Section 19 – Providing Accommodation for Gypsies, Travellers and Travelling Showpeople

The policies contained within this section are:

- Policy 19 - Site Standards for Gypsies, Travellers and Travelling Showpeople

The following graph indicates the level of support, objection or comments received for the policies within Section 19.



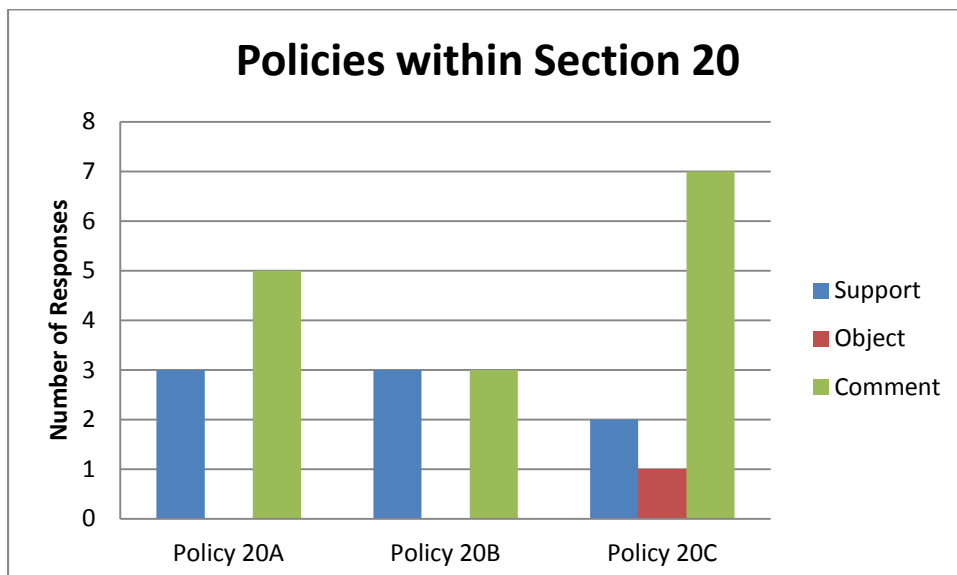
A summary of responses and Officer Comments for Section 19 can be found at Appendix 2 of this document.

### Section 20 – Community Facilities

The policies contained within this section are:

- Policy 20A - Built Communities
- Policy 20B - Green Space
- Policy 20C - Provision for Green Space and Outdoor Community Uses in Development

The following graph indicates the level of support, objection or comments received for the policies within Section 20.



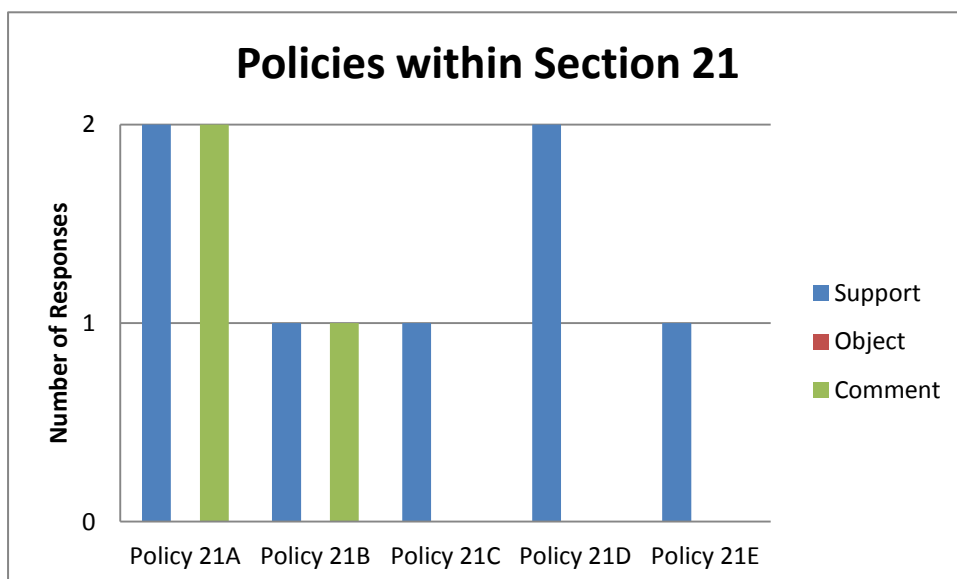
A summary of responses and Officer Comments for Section 20 can be found at Appendix 2 of this document.

### Section 21 – Employment Land

The policies contained within this section are:

- Policy 21A - Urban Employment Land
- Policy 21B - Rural Employment
- Policy 21C - Small Firms/Start-ups
- Policy 21D - Live work units and Homeworking
- Policy 21E - High Quality Offices

The following graph indicates the level of support, objection or comments received for the policies within Section 21.



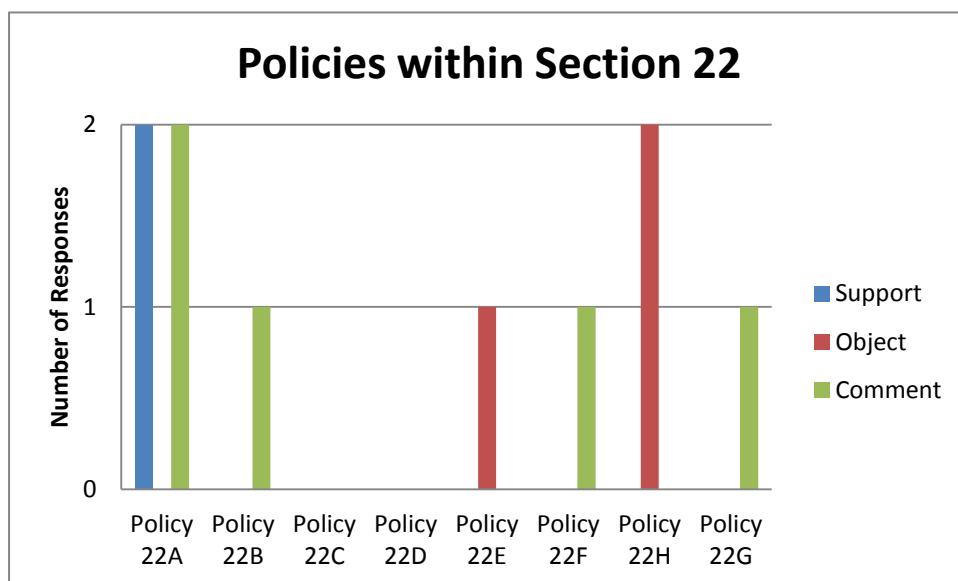
A summary of responses and Officer Comments for Section 21 can be found at Appendix 2 of this document.

## Section 22 - Retail

The policies contained within this section are:

- Policy 22A - Town Centre development
- Policy 22B - Out of Town development
- Policy 22C - Change of use from retail to alternative uses
- Policy 22E - Local Shops
- Policy 22F - Specialist Retailing
- Policy 22G - Food and Drink Retailing
- Policy 22H Hot Food Takeaways

The following graph indicates the level of support, objection or comments received for the policies within Section 22.



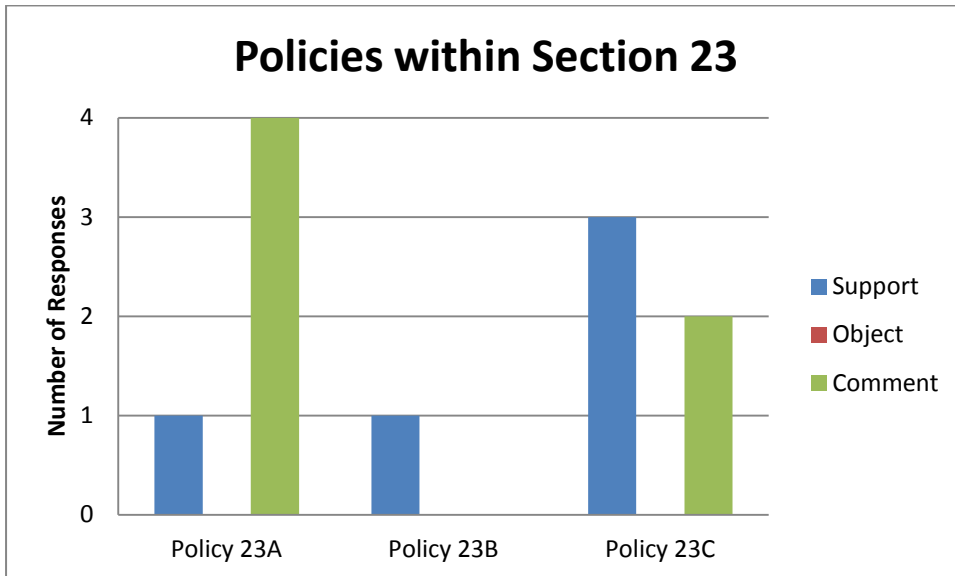
A summary of responses and Officer Comments for Section 22 can be found at Appendix 2 of this document.

## Section 23 – Sustainable Tourism

The policies contained within this section are:

- Policy 23A - Supporting Major Tourist Attractions
- Policy 23B - Supporting Tourist Attractions
- Policy 23C - Tourist Accommodation

The following graph indicates the level of support, objection or comments received for the policies within Section 23.



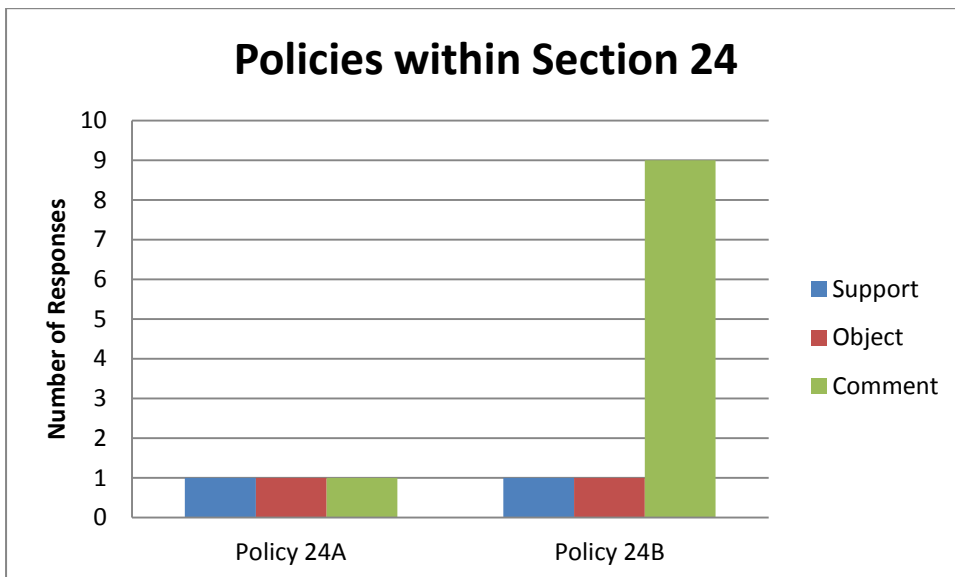
A summary of responses and Officer Comments for Section 23 can be found at Appendix 2 of this document.

### Section 24 – Telecommunications and Renewable Energy

The policies contained within this section are:

- Policy 24A - Telecommunications and Broadband
- Policy 24B - Renewable and Low Carbon Energy

The following graph indicates the level of support, objection or comments received for the policies within Section 24.



A summary of responses and Officer Comments for Section 24 can be found at Appendix 2 of this document.

### Section 25 – Safeguarding the Green Belt

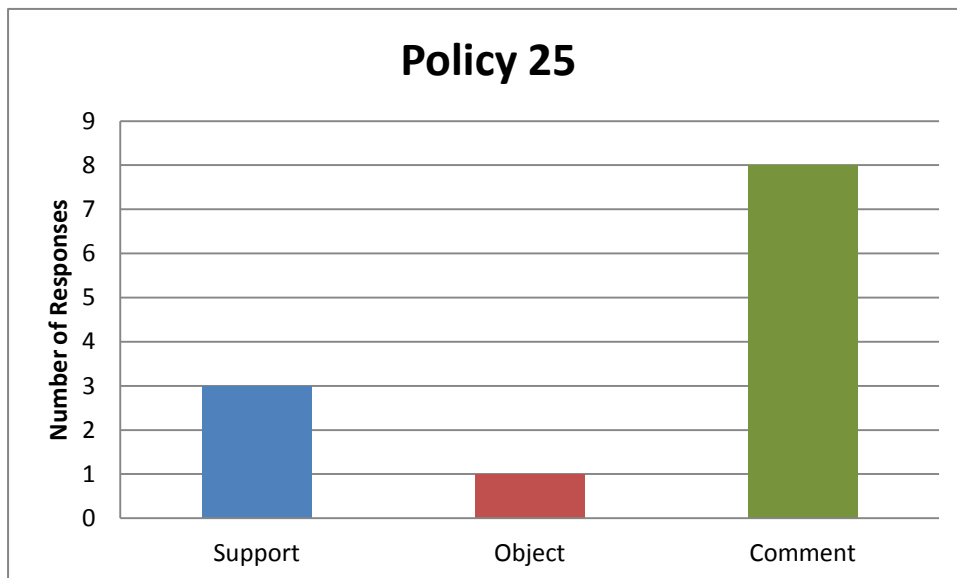
The policies contained within this section are:



## Appendix 4 - Summary of Consultation Responses to the Local Plan Review Preferred Options (Reg 18) Consultation (June 2017)

- Policy 25 - Safeguarding the Green Belt

The following graph indicates the level of support, objection or comments received for the policies within Section 25.



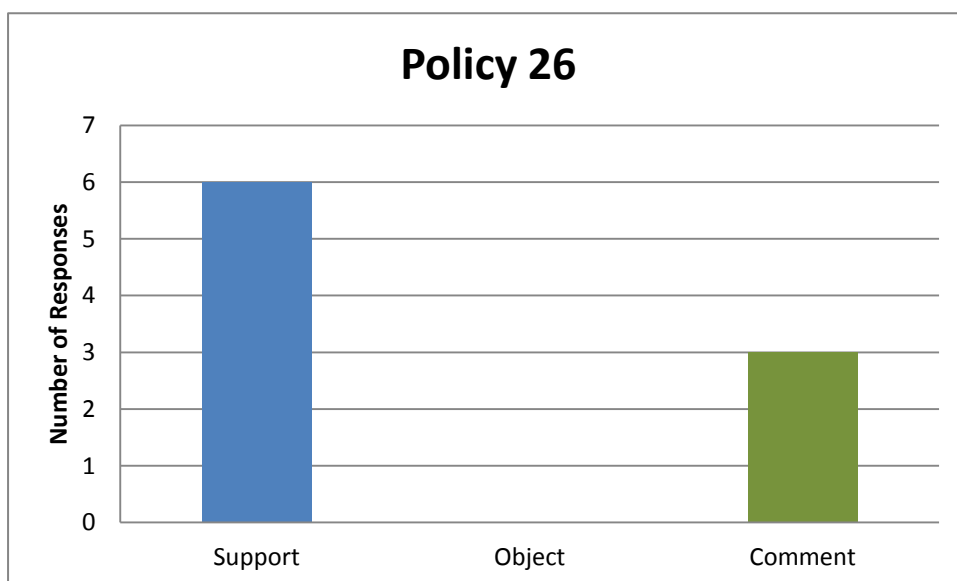
A summary of responses and Officer Comments for Section 25 can be found at Appendix 2 of this document.

### Section 26 – Safeguarding the Historic Environment

The policies contained within this section are:

- Policy 26 - Safeguarding the Historic Environment

The following graph indicates the level of support, objection or comments received for the policies within Section 26.



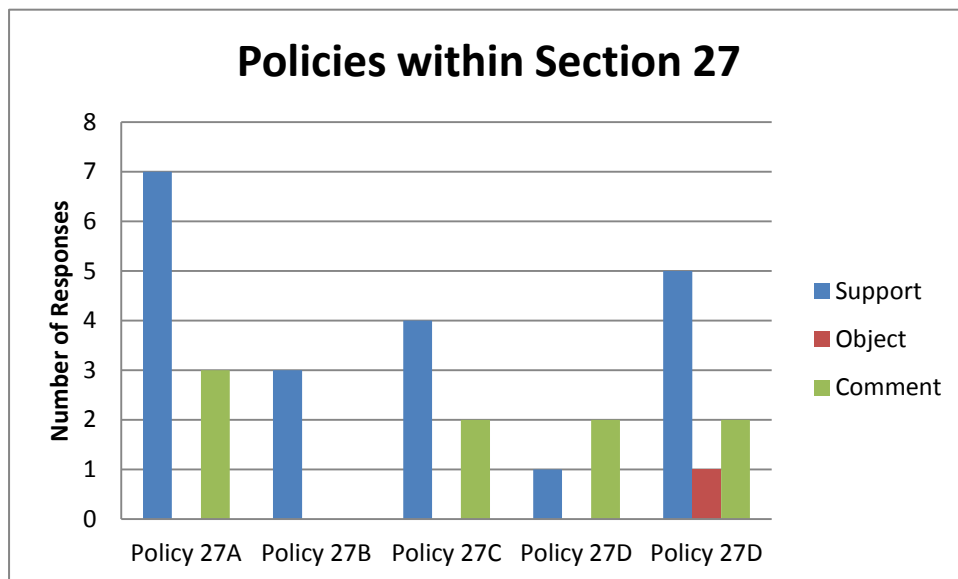
A summary of responses and Officer Comments for Section 26 can be found at Appendix 2 of this document.

## Section 27 – Quality Design and Local Distinctiveness

The policies contained within this section are:

- Policy 27A - Quality Design and Local Distinctiveness
- Policy 27B - Design of Extensions and Alterations
- Policy 27C - Landscaping and Boundary Treatment
- Policy 27D - Advertisements
- Policy 27E - Wyre Forest Waterways

The following graph indicates the level of support, objection or comments received for the policies within Section 27.



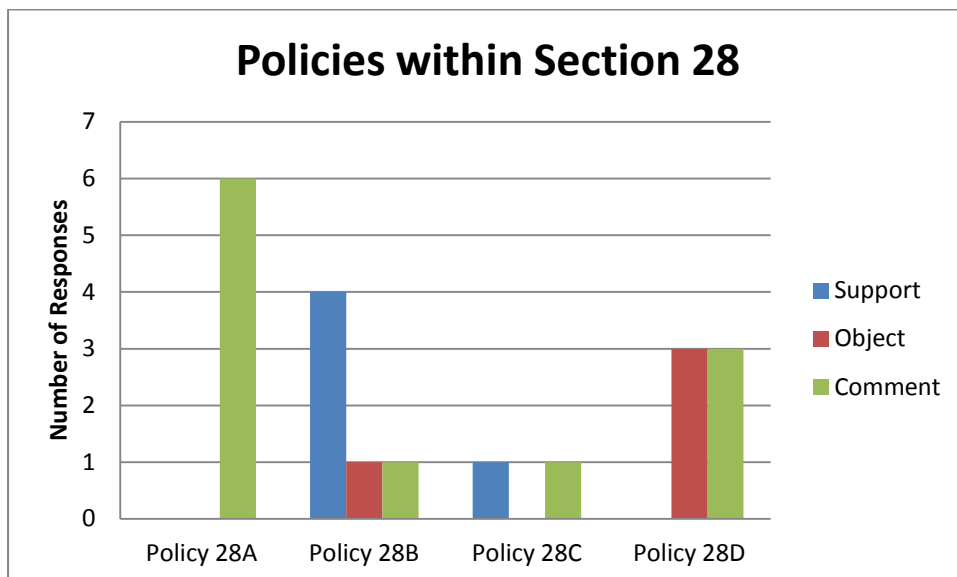
A summary of responses and Officer Comments for Section 27 can be found at Appendix 2 of this document.

## Section 28 – Rural Development

The policies contained within this section are:

- Policy 28A - Re-use and adaptation of rural buildings
- Policy 28B - Chalets, Caravans, Mobile Homes
- Policy 28C - Equestrian Development
- Policy 28D - Agricultural Land Quality

The following graph indicates the level of support, objection or comments received for the policies within Section 28.



A summary of responses and Officer Comments for Section 28 can be found at Appendix 2 of this document.

### Section 29 – Site Allocations Introduction

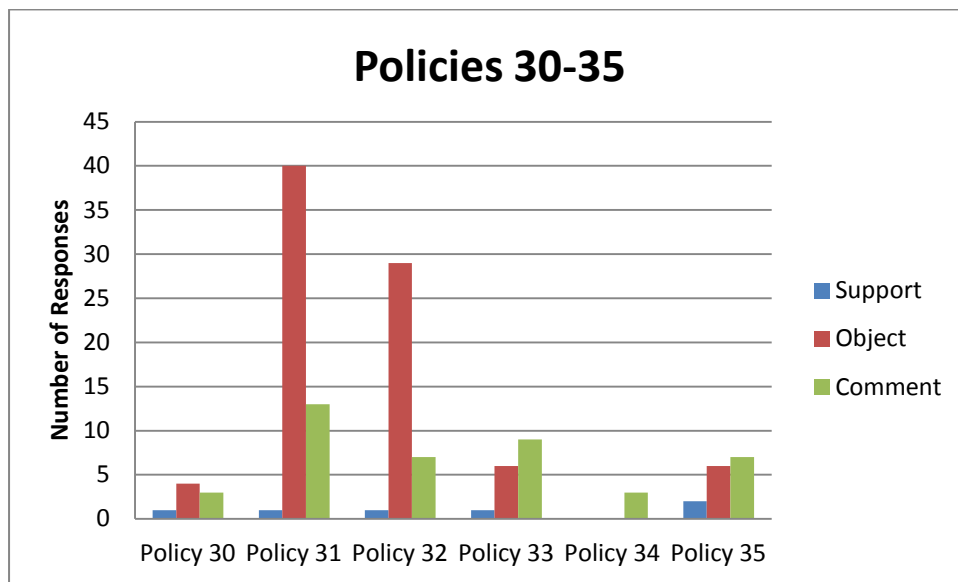
There are no policies within this section. A summary of these responses with Officer Comments can be found in Appendix 3a of this document.

### Sections 30 – 35 – Proposed Allocations

Most of the responses in these sections were made directly against the proposed allocated sites. Analysis of these comments are detailed within Section 6 of this document. The Policies within Sections 30-35 are:

- Policy 30 – Kidderminster Town Allocations
- Policy 31 – Kidderminster Urban Extensions
- Policy 32 – Stourport-on-Severn Site Allocations
- Policy 33 – Bewdley Site Allocations
- Policy 34 – Previously Developed Sites in the Green Belt proposed for allocation
- Policy 35 – Villages and Rural Area Site Allocations

The following graph indicates the level of support, objection or comments received for the policies within Sections 30-35.



Summaries of responses and the key issues arising can be found within Appendix 3 of this document.

### Section 36 – Monitoring and Implementation

There are no policies within this section. A summary of these responses with Officer Comments can be found in Appendix 3a of this document.

## 6) Responses to Preferred Options Document Part C - Proposed Allocated Sites

The following tables and graphs show the level of support, objection or comments that the Council received for each of the proposed allocated sites in the Preferred Options document. The key issues raised by respondents and summaries of the responses can be found within Appendix 3 of this document. The Sections of the document are:-

- Policy 30 – Kidderminster Town
- Policy 31 – Kidderminster Urban Extensions
- Policy 32 – Stourport on Severn
- Policy 33 – Bewdley
- Policy 34 – Previously Developed Sites in the Green Belt
- Policy 35 – Rural Wyre Forest

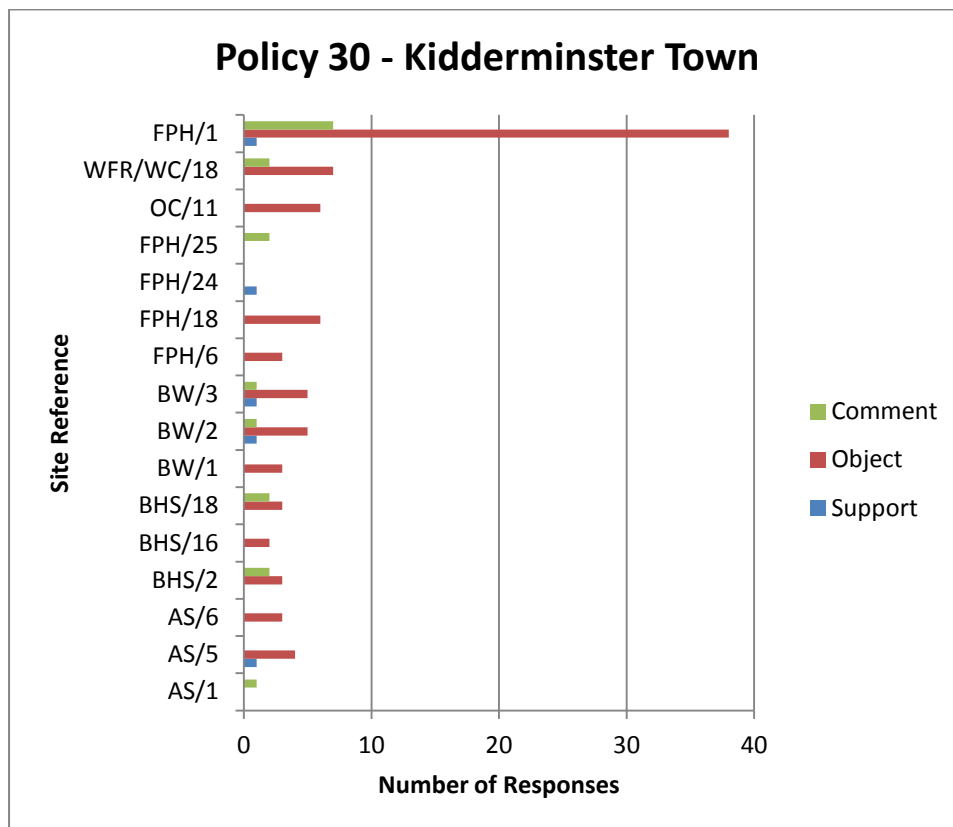
### Policy 30 - Kidderminster Town Allocations

Site Ref	Site description	Support	Object	Comment
<b>Policy 30</b>		<b>2</b>	<b>4</b>	<b>3</b>
<b>Core Sites</b>				
AS/1	Comberton Place	0	0	1
AS/5	Victoria Carpets Sports Ground	1	4	0
AS/6	Lea Street School	0	3	0
BHS/2	Bromsgrove Street	0	3	2

Appendix 4 - Summary of Consultation Responses to the Local Plan Review  
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Site Ref	Site description	Support	Object	Comment
BHS/11	Green Street Depot	0	0	0
BHS/16	Timber Yard, Park Lane	0	2	0
BHS/18	Blakebrook School	0	3	2
BW/1	Churchfields	0	3	0
BW/2	Limekiln Bridge	1	5	1
BW/3	Sladen School	1	5	1
FPH/6	Oasis, Goldthorn Road	0	3	0
FPH/8	SDF and adjacent land	0	0	0
FPH/10	Silverwoods phase 2	0	0	0
FPH/18	Naylor's Field	0	6	0
FPH/23	Silverwoods phase 1	0	0	0
FPH/24	Romwire	1	0	0
FPH/25	Rear of Vale Industrial Estate	0	0	2
FPH/28	Land at Hoobrook	0	0	0
FPH/29	VOSA site	0	0	0
OC/11	Stourminster School site	0	6	0
LI/1	Ceramaspeed	0	0	0
MI/26	Ratio Park, Finepoint	0	0	0
MI/34	Oakleaf, Finepoint	0	0	0
WFR/WC/18	Sion Hill School site	0	7	2
<b>Option A sites</b>				
FPH/1	Settling Ponds	1	38	7
<b>Option B sites</b>				
FPH/1	Settling Ponds	1	38	7

The following graph indicates the level of support, objection or comments received for the sites within Policy 30.



No responses were received for the sites referenced BHS/11, FPH/8, FPH/10, FPH/23, FPH/28, FPH/29, LI/1, MI/26 and MI/34

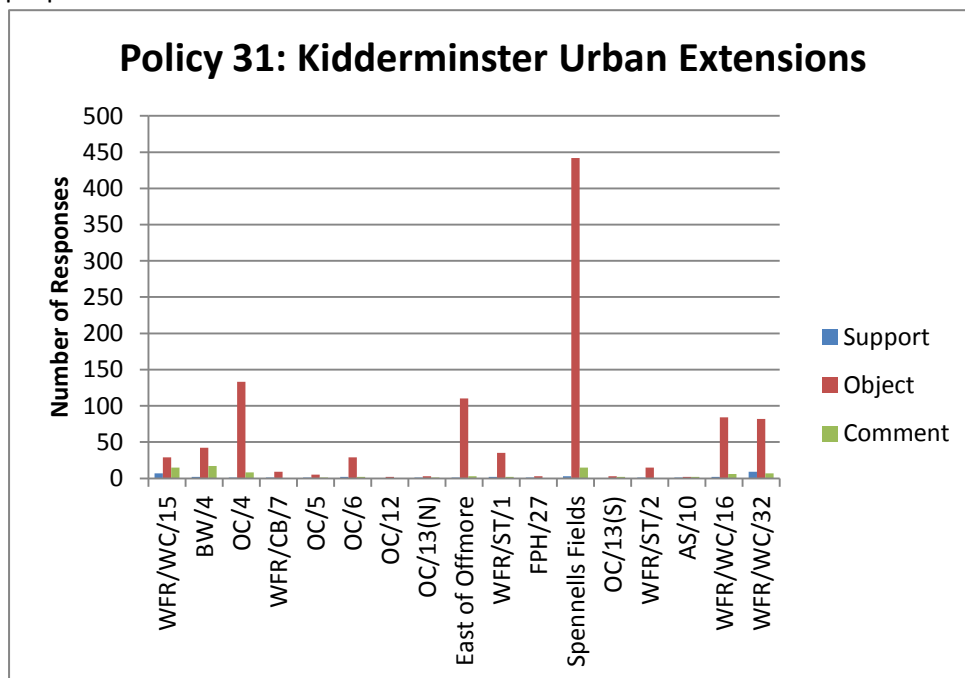
### Policy 31 - Kidderminster Urban Extension Sites

Site Ref	Site description	Support	Object	Comment
<b>Policy 31</b>	-	<b>1</b>	<b>40</b>	<b>13</b>
<b>Core Sites</b>				
WFR/WC/15	Lea Castle Hospital	7	29	15
	Lea Castle general	2	3	2
BW/4	Hurcott ADR	2	42	17
OC/4	Rear of Baldwin Road	1	133	8
WFR/CB/7	Land off Birmingham Road	1	9	0
OC/5	Husum Way	1	5	1
OC/6	East of Offmore Farm	2	29	2
OC/12	Comberton Lodge Nursery	0	2	0
OC/13(N)	Stone Hill North	1	3	1
WFR/CB/7, OC/5/6/12/13N	East of Offmore	1	110	3
WFR/ST/1	Captains & the Lodge	2	35	2
FPH/27	Adjacent Easter Park (Employment)	1	3	0

Appendix 4 - Summary of Consultation Responses to the Local Plan Review Preferred Options (Reg 18) Consultation (June 2017)

Site Ref	Site description	Support	Object	Comment
<b>Option A Sites</b>				
OC/13(S), WFR/ST/2, AS/10	Spennells fields	3	442	15
OC/13(S)	Stone Hill South	0	3	2
WFR/ST/2	Land off Stanklyn Lane	1	15	0
AS/10	Rear of Spennells & Easter Park	1	2	2
WFR/WC/16	Lea Castle Hospital extension (S)	2	84	6
<b>Option B Sites</b>				
WFR/WC/32	Lea Castle Hospital extension (E)	9	82	7

The following graphs indicate the level of support, objection or comments received for each of the proposed Kidderminster Urban Extension site allocations.



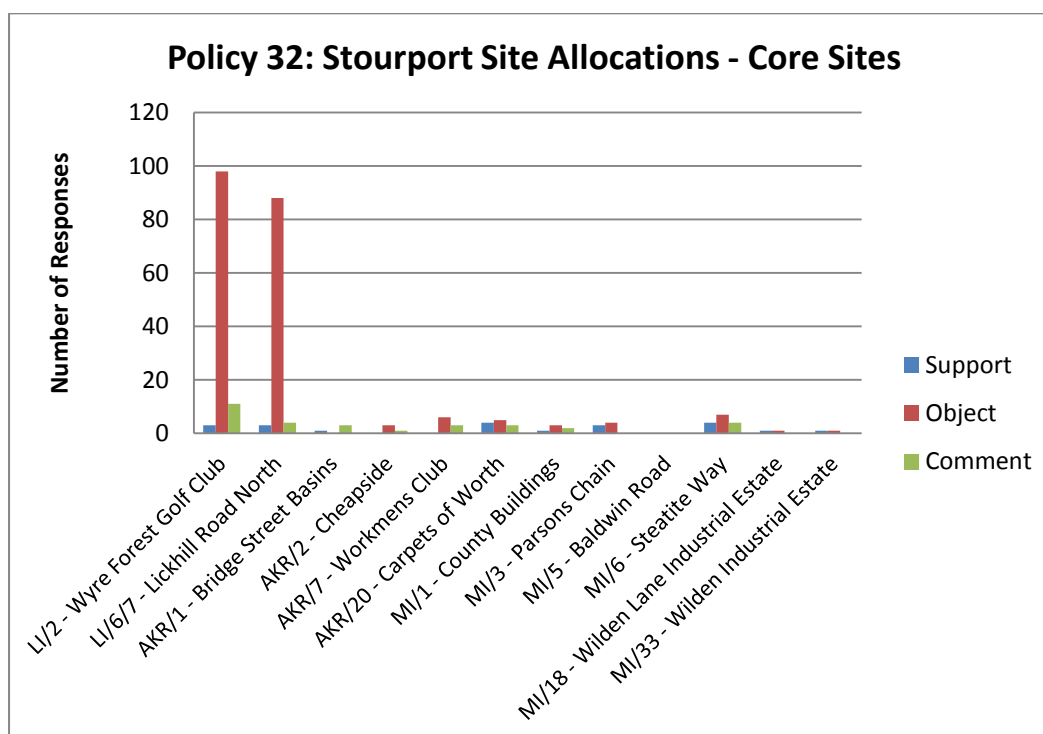
**Policy 32 - Stourport-on-Severn Site Allocations**

Site Ref	Site description	Support	Object	Comment
<b>Policy 32</b>	-	1	2930	7
<b>Core Sites</b>				
LI/2	Wyre Forest Golf Club, corner of Kingsway	3	98	11
LI/6/7	Lickhill Road North	3	88	4
AKR/1	Bridge Street Basins	1	0	3
AKR/2	Cheapside	0	3	1
AKR/7	Swan Hotel /	0	6	3

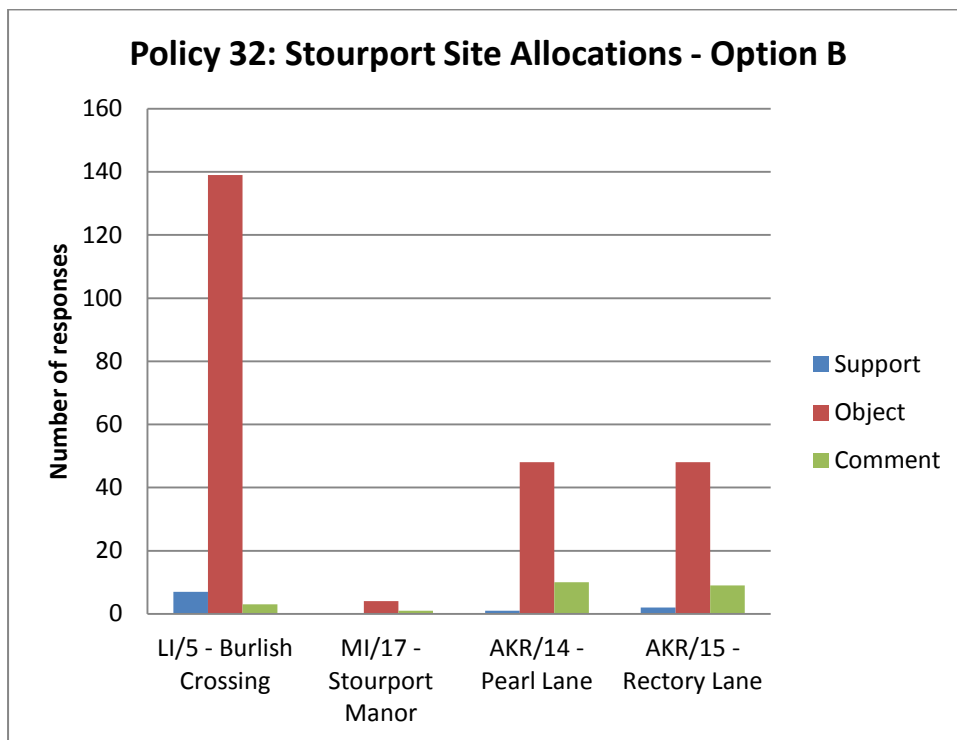
Appendix 4 - Summary of Consultation Responses to the Local Plan Review  
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Site Ref	Site description	Support	Object	Comment
	Working Men's Club			
AKR/20	Carpets of Worth	4	5	3
MI/1	County Buildings	1	3	2
MI/3	Parsons Chain	3	4	0
MI/5	Baldwin Road	0	0	0
MI/6	Steatite Way	4	7	4
MI/18	North of Wilden Lane Industrial Estate	1	1	0
MI/33	Wilden Industrial Estate	1	1	0
<b>Option B Sites</b>				
Option B sites	-	0	2	2
LI/5	Burlish Crossing	6	140	3
MI/17	Stourport Manor	0	4	1
AKR/14	Pearl Lane	1	48	10
AKR/15	Rectory Lane	2	48	9

The following graphs indicate the level of support, objection or comments received for each of the proposed Stourport-on-Severn site allocations.



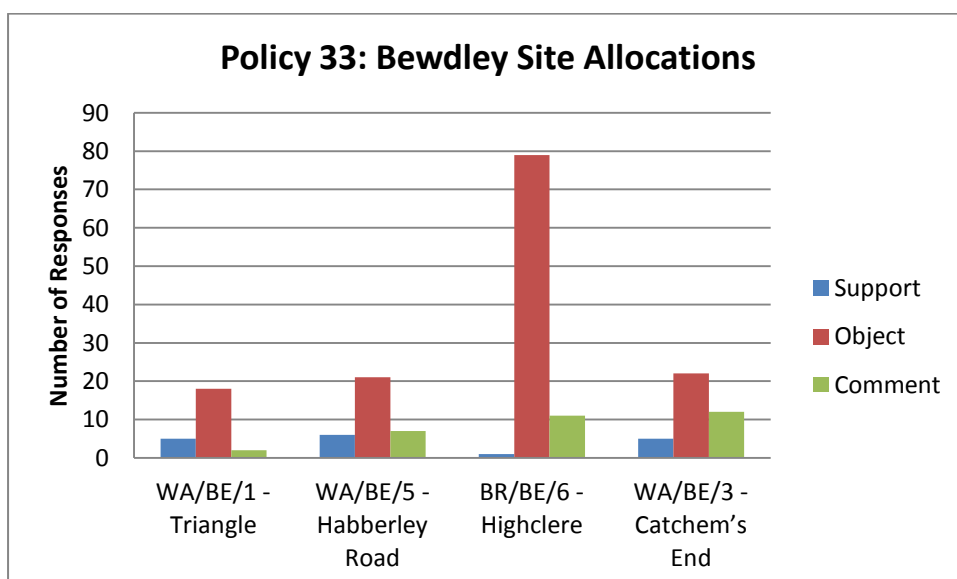




### Policy 33 - Bewdley Site Allocations

Site Ref	Site description	Support	Object	Comment
<b>Policy 33</b>	-	1	6	9
<b>Core Sites</b>				
WA/BE/1	Stourport Road Triangle	5	18	2
WA/BE/5	Land south of Habberley Road	6	21	7
BR/BE/6	Land off Highclere	1	78	11
<b>Option B Sites</b>				
WA/BE/3	Catchem's End	5	22	12

The following graph indicates the level of support, objection or comments received for each of the proposed Bewdley site allocations.



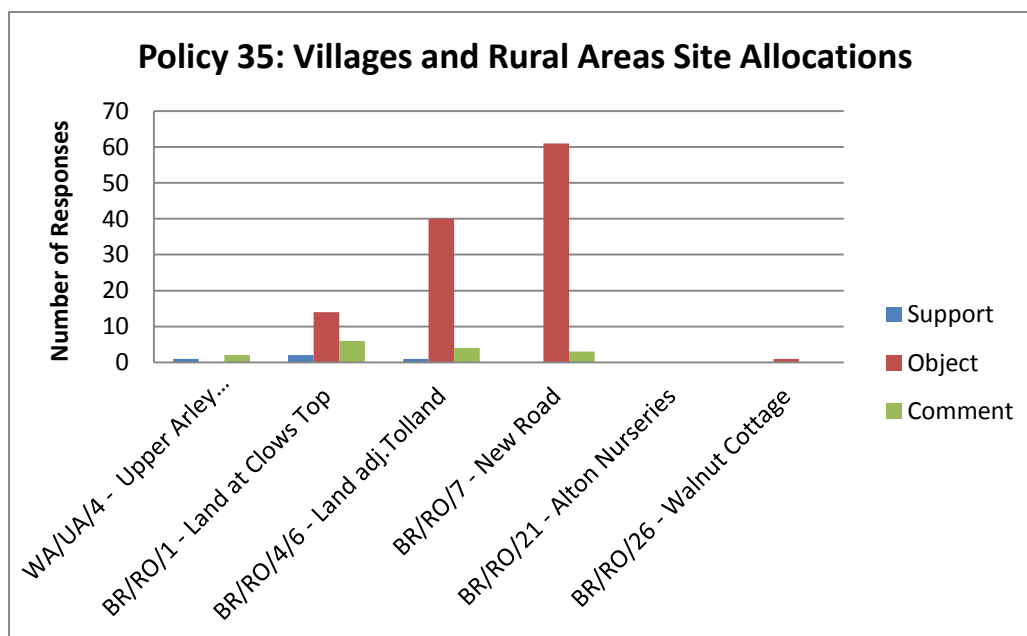
### Policy 34 – Previously Developed Sites in the Green Belt

A total of four comments were received to this section. A summary of responses and Officer Comments for Section 34 can be found at Appendix 3a of this document.

### Policy 35 – Villages and Rural Areas Site Allocations

Site Ref	Site description	Support	Object	Comment
<b>Policy 35</b>	-	2	6	7
<b>Core Sites</b>				
WA/UA/4	Allotments, Upper Arley	1	0	2
BR/RO/1	Land at Clows Top	2	14	6
BR/RO/4/6	Land adjacent Tolland, Far Forest	1	40	4
BR/RO/7	New Road, Far Forest (S)	0	61	3
BR/RO/21	Alton Nurseries, Long Bank	0	0	0
BR/RO/26	Walnut Cottage, Bliss Gate	0	1	0
<b>Option B Sites</b>				
BR/RO/7	New Road, Far Forest (N)	0	61	3

The following graph indicates the level of support, objection or comments received for the proposed Villages and Rural Areas site allocations.



**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION - CALL FOR SITES**

There were 51 sites formally submitted during the Preferred Options consultation.

Location	Current Land Designation	HELAA Ref.	Officer Comments
<b>KIDDERMINSTER</b>			
East Field, Bewdley Hill	Green Belt	Part BHS/21	Any development would encroach into strategic Green Belt gap between towns. Access possible from The Lea but would severely limit numbers. Lies on potential wildlife corridor linking areas of acidic grassland. Mitigation difficult.
Railway Corner, Stanklyn Lane	Green Belt	AS/9	Surface water flooding against embankment after heavy rain. Potential to bring forward if adjacent site (AS/10) is allocated.
Land off Ferndale Crescent	Green Belt	WA/KF/2	Would have unacceptable impact on open landscape and Green Belt and would not give easily defensible boundary to Green Belt.
164 & 165 Sutton Park Road	Greenfield	FPH/19	Could potentially bring forward very limited development if highways objections on visibility grounds can be overcome.
Football Ground and Stadium Close car park	Brownfield	AS/2 & AS/22	This is a sustainable and suitable location for residential development but is reliant on an alternative location being agreed for the Harriers with a viable business.
Harriers Training Ground	Green Belt	MI/37	If the built development is located immediately to the rear of Finepoint on the former golf driving range and Gilt Edge Social Club site and a viable business case is put forward and justification made for releasing relocation site from Green Belt, then these proposals could be supported.
Land at Low Habberley (Phase 1)	Green Belt	WA/KF/3	If a strong defensible boundary can be made, then this site could potentially be released from the Green Belt.
Land at Low Habberley (Phase 2)	Green Belt	WA/KF/3	Detrimental impact on openness of Green Belt. Would extend built development north of Habberley Road into open countryside. No strong defensible boundary at this location.
Land at Habberley Road, Kidderminster	Green Belt	WA/BE/13	Would extend built development into gap between Kidderminster and Bewdley; access near entrance to Habberley Valley. Detrimental visual impact and highways difficulties. Site lies between 2 known areas of acidic grassland. Site likely to function as wildlife corridor.
Severn Grove Shops, Rifle Range, Kidderminster	Brownfield	FPH/15	Currently allocated for redevelopment. If a viable scheme can be found, this site could still come forward.
Land off Selba Drive, Kidderminster	Greenfield	BHS/22	Sensitive site setting with rural views from existing Selba Drive properties and mature trees contained within a remnant historic field

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION - CALL FOR SITES**

Location	Current Land Designation	HELAA Ref.	Officer Comments
			boundary. Well-used open space. Should not be developed.
Wolverley Camp, Brown Westhead Park	Green Belt	WFR/WC/20	Highly sensitive site – development would have detrimental impact on mature woodland and be contrary to dispersed settlement patterns seen to north of Wolverley Road.
North of Marlpool Estate, Wolverley Road	Green Belt	FHN/7	Borders a sensitive rural landscape and greenbelt corridor between Kidderminster and Fairfield. The northern woodland should be retained and enhanced as screening and the B4190 buffered. Allocate as Reserved Housing Site to be brought forward in a future Local Plan if required.
Land off Mill Lane (Fairfield)	Green Belt	WFR/WC/21	Any development would be limited by access from Mill Lane (private road). Could allocate for around 6 dwellings on eastern paddock as a Reserved Housing Site.
Lea Castle (Strong Farms)	Green Belt	WFR/WC/39	Site would be highly sensitive to development due to its intact rural character, topography, impact on the setting of mature woodland character. Built development will impose substantial harm to landscape character.
Stour Corridor (Strong Farms)	Green Belt	WFR/WC/40	Very sensitive landscape with setting of canal and local wildlife sites. Potential for ecological harm from large-scale dredging.
Hayes Road, Wolverley ADR	Greenfield	WFR/WC/23	Existing Area of Development Restraint owned by Wyre Forest Community Housing. Potential to bring forward for housing in 2 distinct blocks working with gradient.
Land off Lowe Lane, Fairfield ADR	Greenfield	WFR/WC/22	Potential to bring forward part of this existing Area of Development Restraint for housing – treat as extension to affordable housing development at Attwood Close.
Land south of Fairfield Lane (off Franche Rd)	Green Belt	WFR/WC/38	This site will encroach into a sensitive landscape within the Honey Brook corridor. The scale of the proposed development would harm landscape and also reduce strategic gap between Kidderminster and Fairfield. Development would be very prominent.
Land south of Cookley	Green Belt	WFR/WC/13	Very sensitive to development due to open views to the south, impact on the setting of mature woodland character and high risk of coalescence between Kidderminster and Cookley.
Land adjacent to Hurcott Kennels, Kidderminster	Green Belt	WFR/WC/35	A sensitive site that will impact on the setting of Wood House and Woodhouse Farm. Land to the south of A451 should be kept open to protect setting of Hurcott village, wood and pools.

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION - CALL FOR SITES**

<b>Location</b>	<b>Current Land Designation</b>	<b>HELAA Ref.</b>	<b>Officer Comments</b>
Rock Tavern Car Park, Caunsall	Green Belt / Brownfield	WFR/WC/36	Potential for small infill development at this junction. Surface water flooding issues will need to be addressed.
Land at Gaymore Farm, Cookley	Green Belt	WFR/WC/5	Significant impact to the setting of Gaymore Farm and the historic character of dispersed settlement.
Land at Caunsall Road	Green Belt	WFR/WC/37	Wayside frontage development would be possible at this location to fit in with settlement pattern.
Land at Wolverhampton Road (2 parcels)	Green Belt	WFR/WC/16	This is a very open, rural landscape currently distinct from the northern suburban fringe of Kidderminster. Development of any part of this site will result in a substantial impact to the landscape character.
Land north of Stone Hill	Green Belt	WFR/ST/3 (majority)	Highly sensitive rural landscape that should not be developed in order to protect and to maintain the visual rural character of the western approach towards Kidderminster and the setting of Glebe House / Farm and the western edge of Stone, which is a very low density dispersed settlement character.
Land west of Stanklyn Lane	Green Belt	WFR/ST/4	The woodland corridor and setting of Stanklyn Lane are vulnerable to the impact of development here.
Land north of Birmingham Road	Green Belt	WFR/CB/6	Development will affect the character and setting of Hurcott Lane and Hurcott Hall Farm. The character of the western approach to Kidderminster will be affected.
Extension to land at Stone Hill North	Green Belt	WFR/ST/10	Development of this site would represent major encroachment into open rural landscape.
<b>STOURPORT-ON-SEVERN</b>			
Yew Tree Walk, Stourport	Green Belt / Brownfield	AKR/18	Any development should be kept to the plateau of made land only with woodland retained to help screen development from across River Severn. Additional landscaping will be required.
Queens Road shops, Stourport	Brownfield	AKR/10	This is an existing allocation and should be retained. Unused land will be brought back into beneficial use.
School site Coniston Crescent	Green Belt / Brownfield	MI/38	Opportunities to buffer and enhance the boundaries to provide screening of the development. Existing trees should be enhanced to develop a buffer between the development and Coniston Crescent that will also enhance urban GI.
Firs Yard Wilden Lane	Green Belt	MI/36	Much of site is affected by flooding so all pitches will need to be positioned adjacent Wilden Lane entrance.

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION - CALL FOR SITES**

Location	Current Land Designation	HELAA Ref.	Officer Comments
Land at Wilden Top	Green Belt	MI/20	Not considered suitable for development as would have detrimental effect on open rural landscape and setting of 19 <sup>th</sup> century houses along historic former roadway. Not a sustainable location.
Land at Areley Common, Stourport (mostly in Malvern Hills DC)	Greenfield	AKR/13	Application refused. Main reasons – unallocated site in open countryside; adverse impact on landscape. Surface water discharge problem. Majority of site falls within Malvern Hills DC. Transport issues also likely this side of River Severn.
<b>BEWDLEY</b>			
Land off Snuff Mill Walk, Bewdley	Greenfield	BR/BE/15	Site drains into Snuff Mill Brook system which is at capacity. Complex topography, hydrology and biodiversity issues. Listed Building adjacent site. Steeply sloping site. Not suitable
Crundalls/Hoarstone Lane	Green Belt	WA/BE/14	Landscape impact; potential biodiversity issues. Impact on setting of nearby heritage assets. Impact on openness of Green Belt as no housing development on this side of lane. Site at higher level than housing opposite.
Grey Green Lane, Bewdley	Green Belt	WA/KF/1	Flood storage area on northern section of site. Potential to develop small part of site to rear of former school site with access from Arlington Court. Propose as Reserved Housing Site for future development beyond plan period.
The Lakes, Dry Mill Lane	Greenfield	Part of BR/BE/10	Development of this site will impose substantial harm to the historic setting of Bewdley and Wyre Forest. Appeal dismissed.
Northwood Lane, Bewdley	Greenfield	WA/BE/4	Poor access, amenity issues for future residents as immediately below SVR and possible overlooking issues for existing bungalows opposite.
<b>VILLAGES AND RURAL</b>			
Oxleys, Clows Top	Greenfield	BR/RO/27	Open pasture land – outside of village. Drainage issues- would require connection to Rock pumping station. Poor access and not considered a sustainable location.
Land at Pound Bank	Greenfield	BR/RO/14	Remote from settlement. Other more sustainable sites available in Parish.
Adjacent Wain House, Lye Head	Greenfield	BR/RO/29	Too small and remote. Adjacent Gladderbrook. Not sustainable location.
Fingerpost Cottage, Callow Hill	Greenfield	BR/RO/30	Adjacent to SSSI and poor access. Highways safety issues near junction. Severe biodiversity constraints.
Rectory Lane, Rock	Greenfield	BR/RO/22	Potential issues with surface water discharge need to be overcome. Look to amend settlement boundary to allow for limited

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION - CALL FOR SITES**

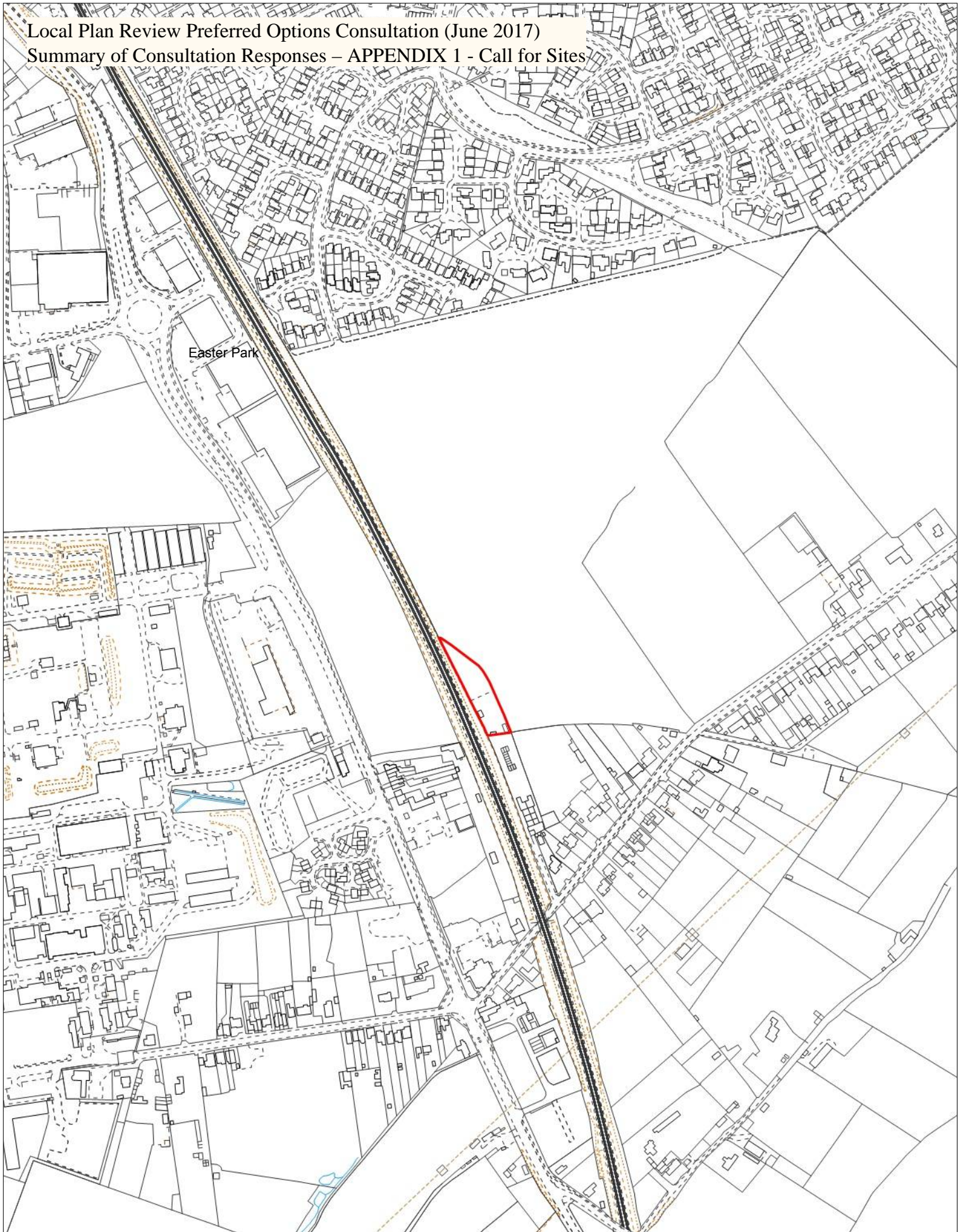
Location	Current Land Designation	HELAA Ref.	Officer Comments
			development at this site.
Hill House Farm, Arley Lane, Shatterford	Green Belt	WA/UA/5	Site slopes down towards stream running along boundary. Not considered to be sustainable location. Open landscape. Site at much lower level than ex-council houses opposite. Adverse impact on openness of Green Belt as limited development on this side of lane.
Station Yard, Blakedown	Brownfield	WFR/CB/2	Not considered suitable for housing on amenity grounds. Potential site for station parking.
Cursley Distribution Park	Green Belt / Brownfield	WFR/ST/9	Not considered a sustainable location for residential development. Allocate as a Previously Developed Site in the Green Belt for employment.
Adj. Bentley Grove Mustow Green	Green Belt	WFR/CC/11	Would extend development away from Mustow Green into open countryside characterised by scattered farmsteads and large dwellings. Adverse impact on openness of Green Belt and setting of adjacent Listed Building.
Adj. Chaddesley Corbett School	Green Belt	WFR/CC/10	Substantial surface water flow through site after heavy rains. Remote from other residential development and would not be in keeping with settlement pattern.
Adj. Red Lion Court, Bridgnorth Road, Arley	Green Belt / Brownfield	WA/UA/6	Small former car park to pub which has been redeveloped for housing (in Shropshire). Allocate for 2 dwellings.
Land at Fold Farm, Chaddesley	Green Belt	WFR/CC/8	Small paddock on edge of Conservation Area. Potential to release for small elderly person bungalow scheme.

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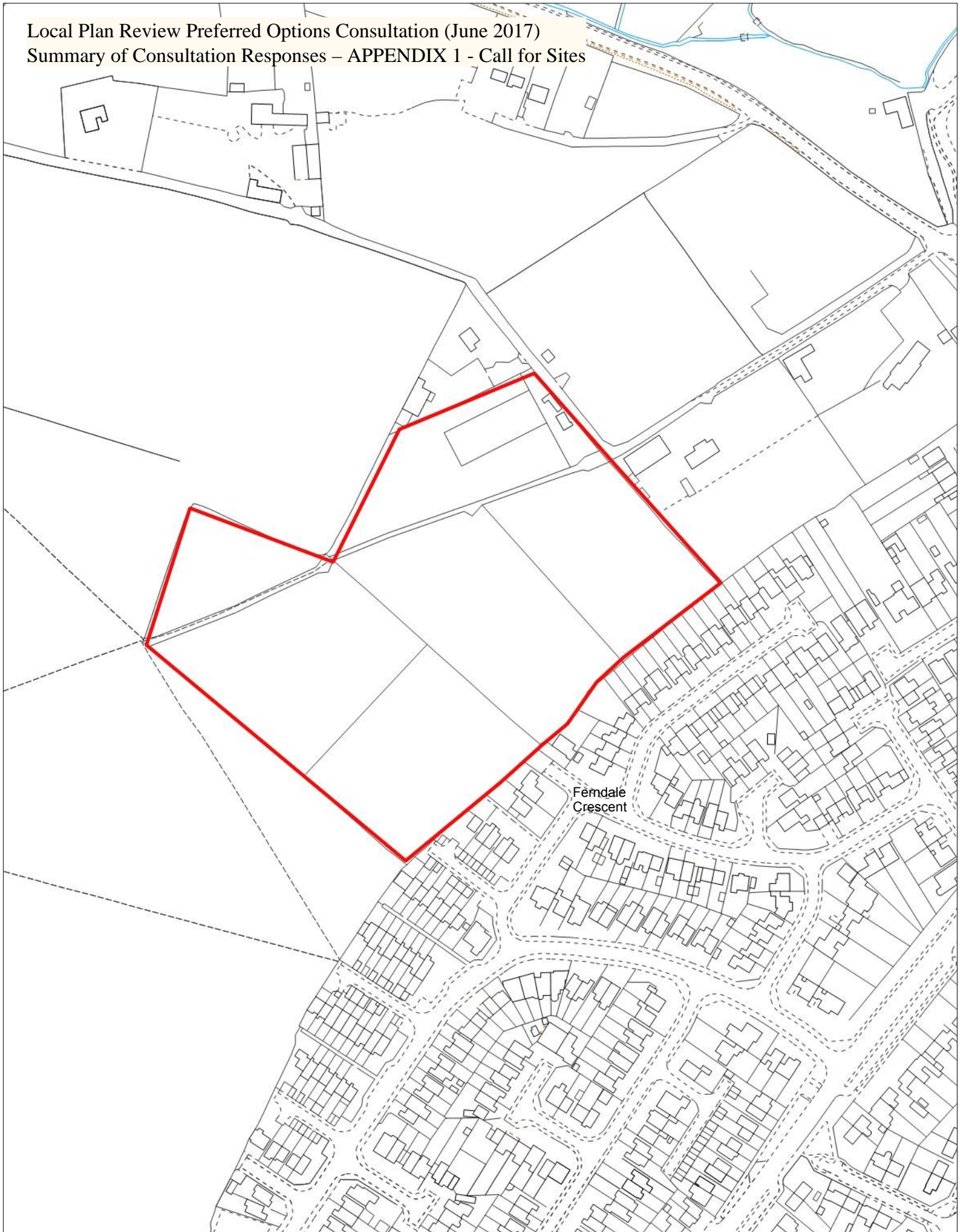




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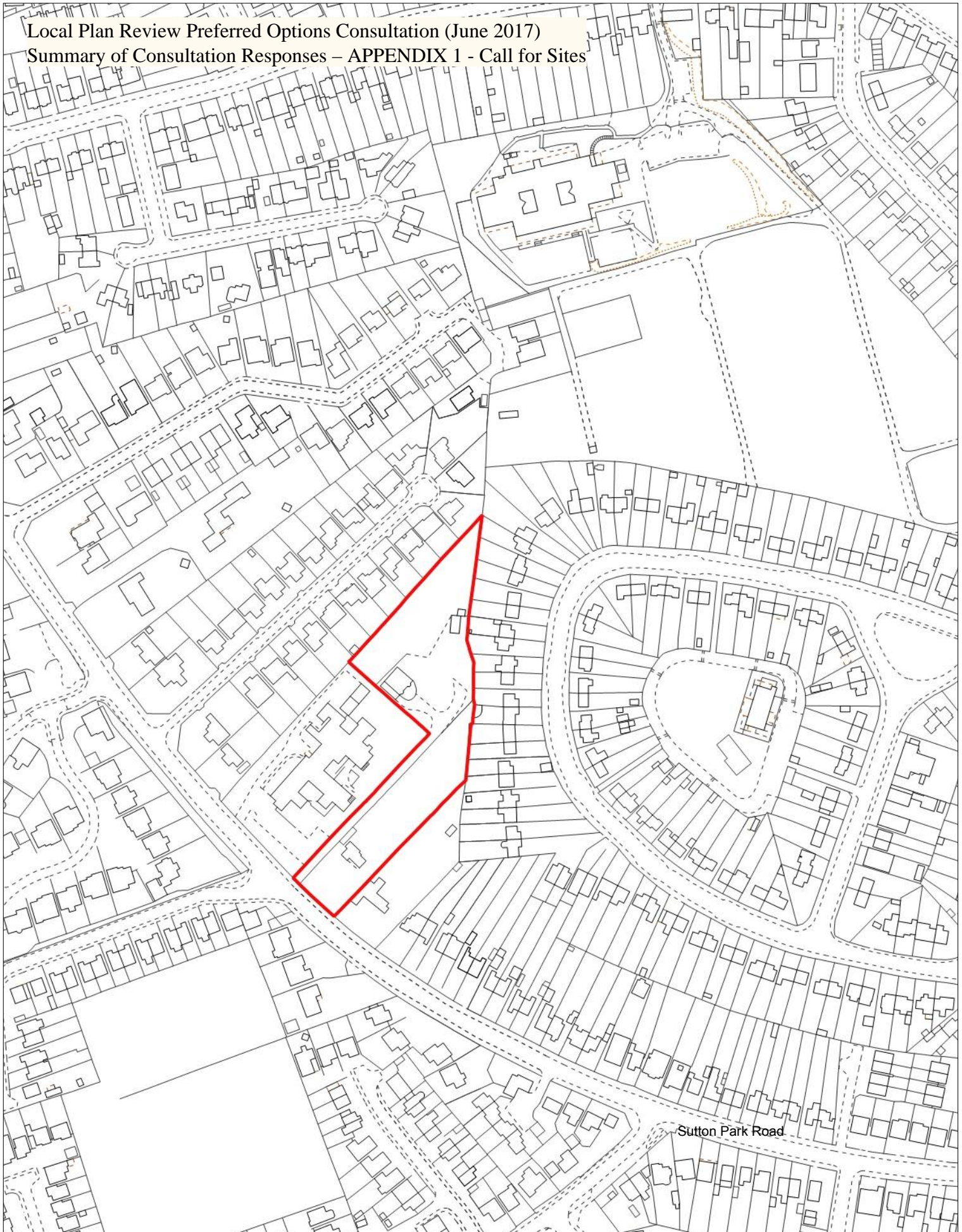
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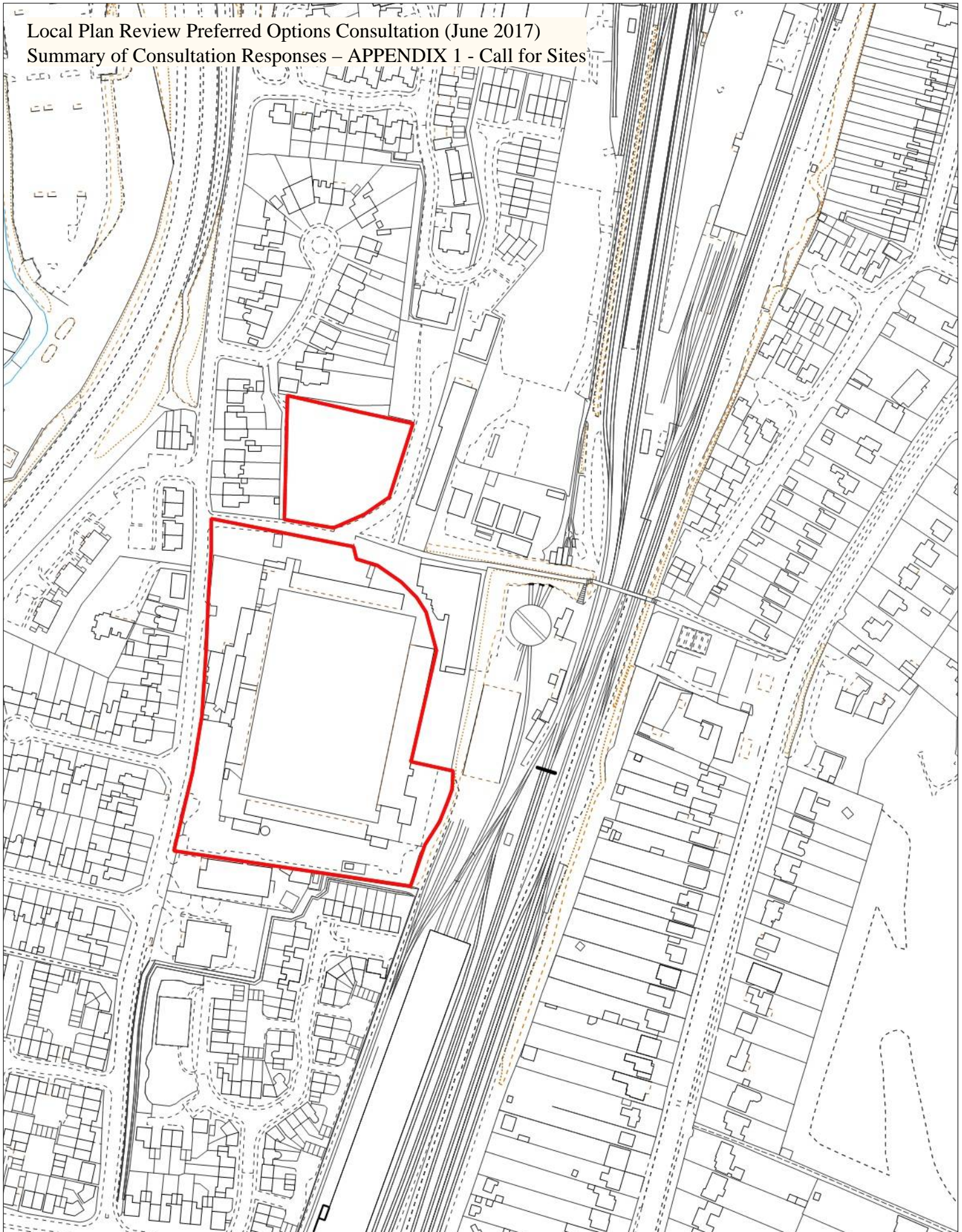
Ferndale Crescent



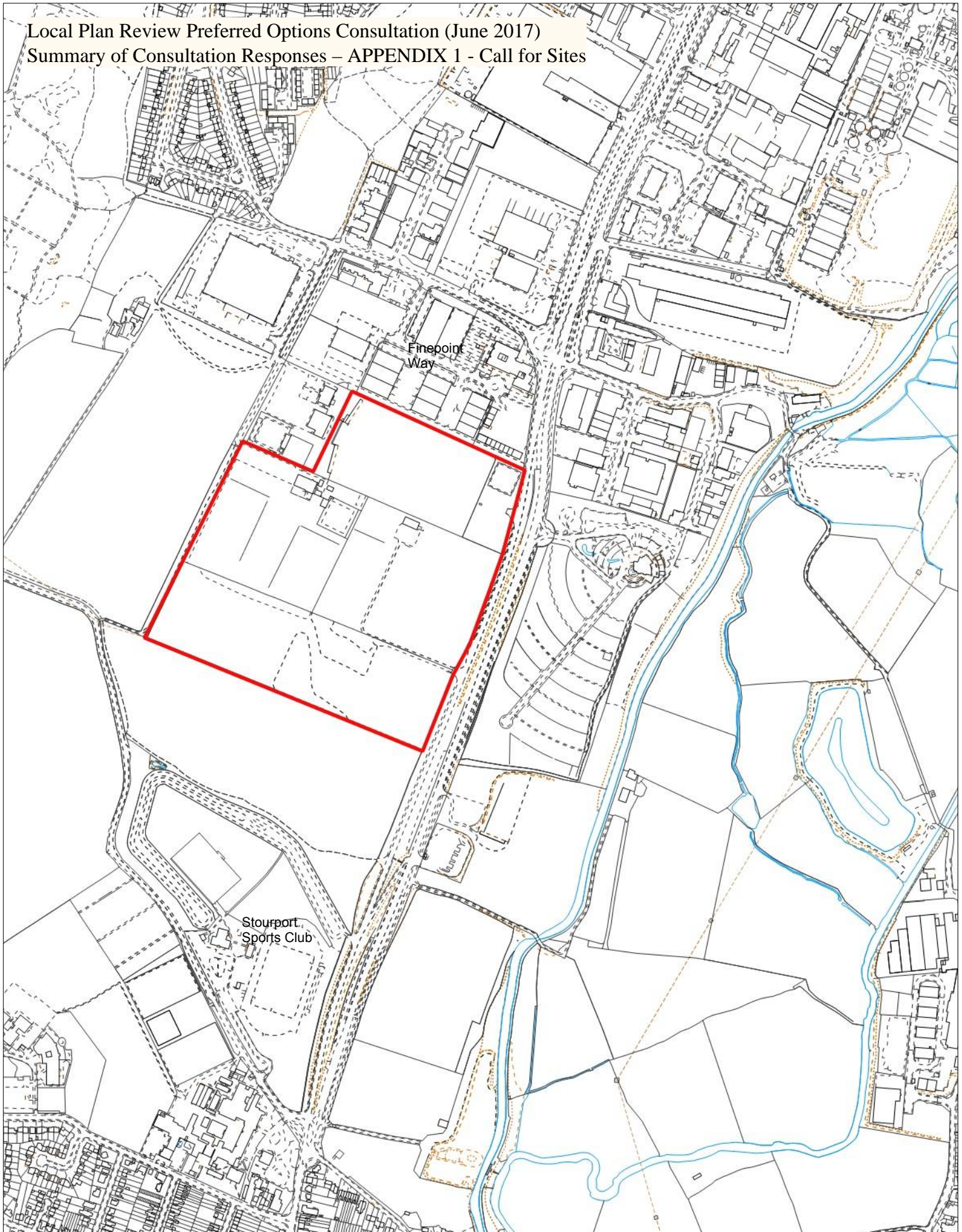
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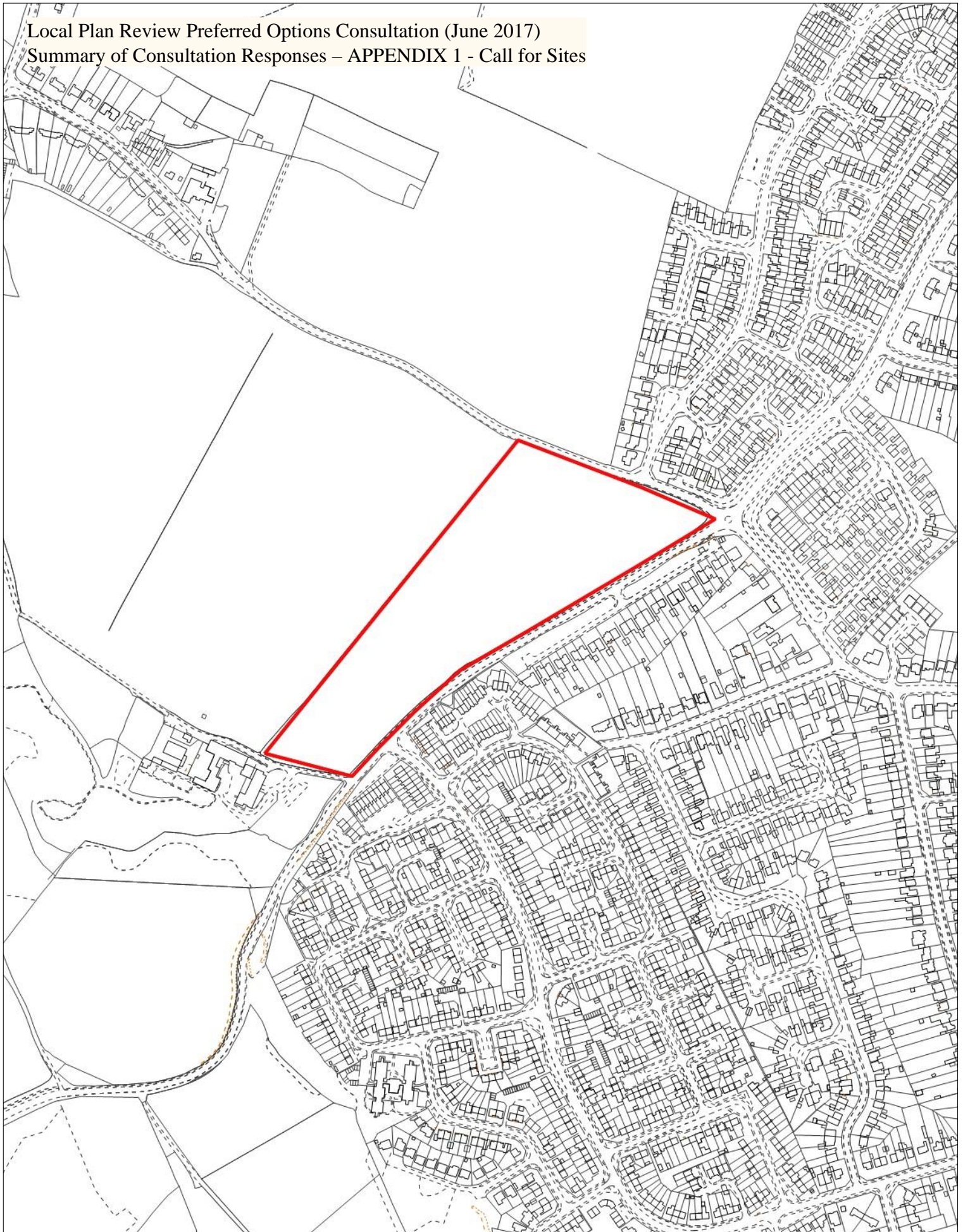
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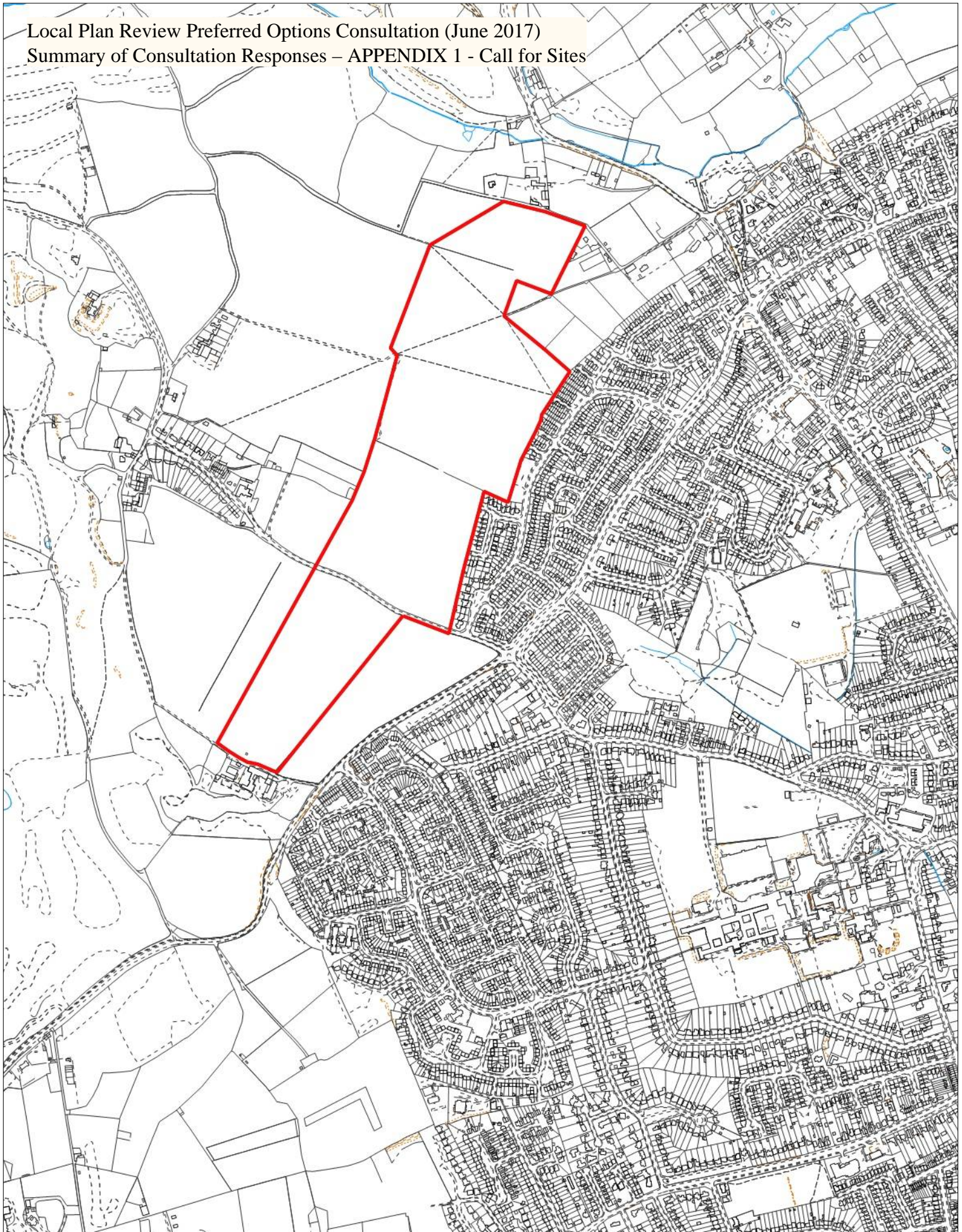
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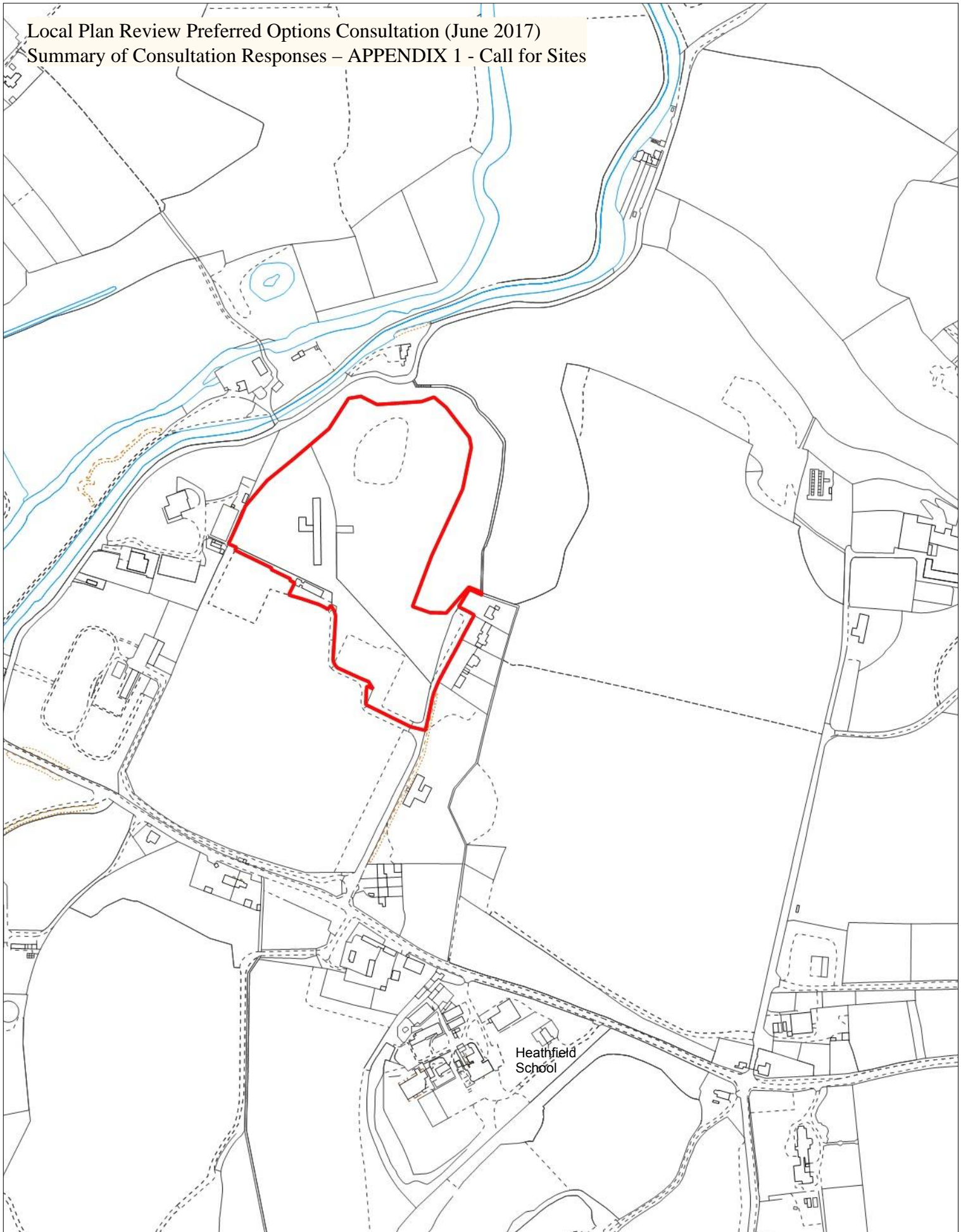
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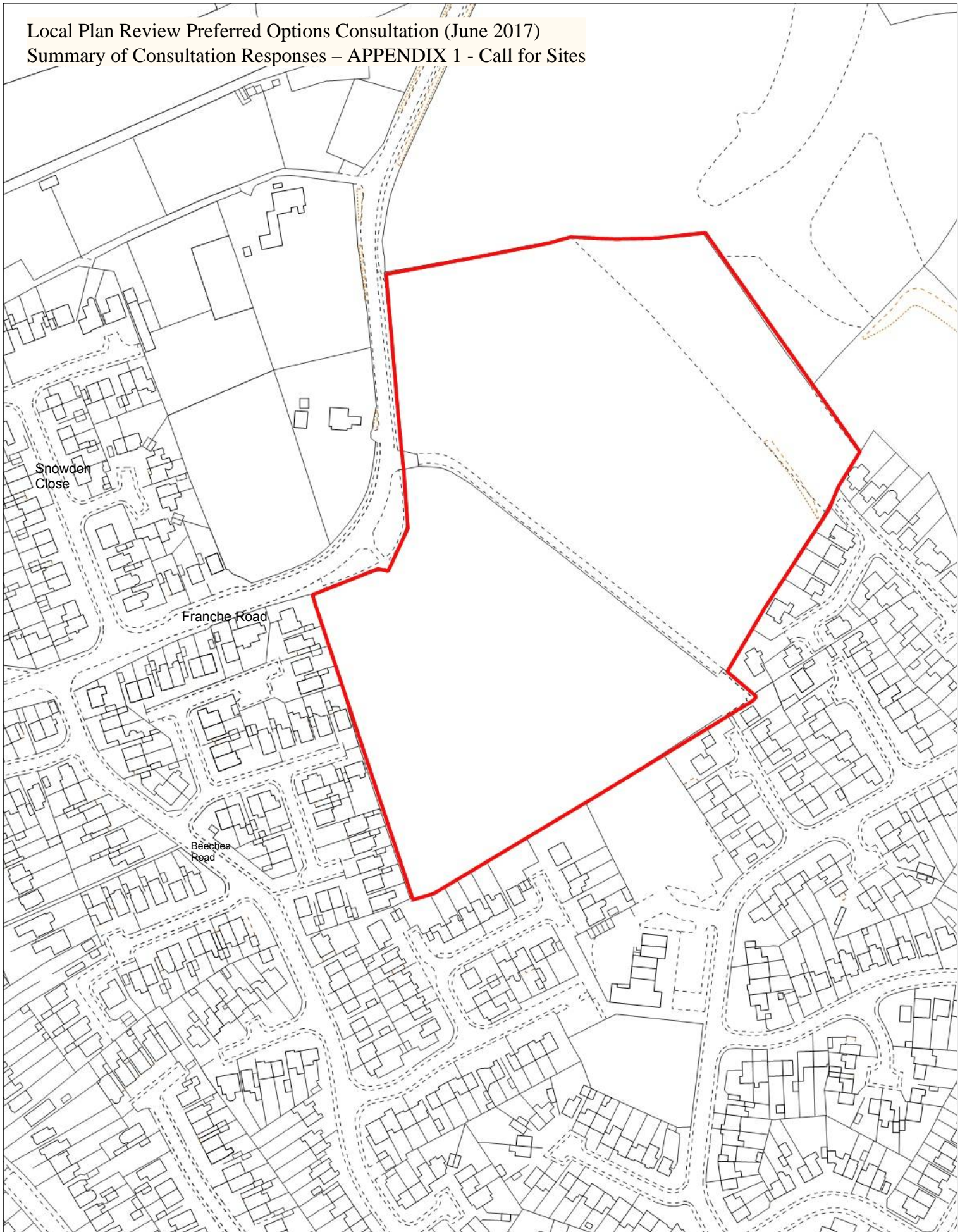
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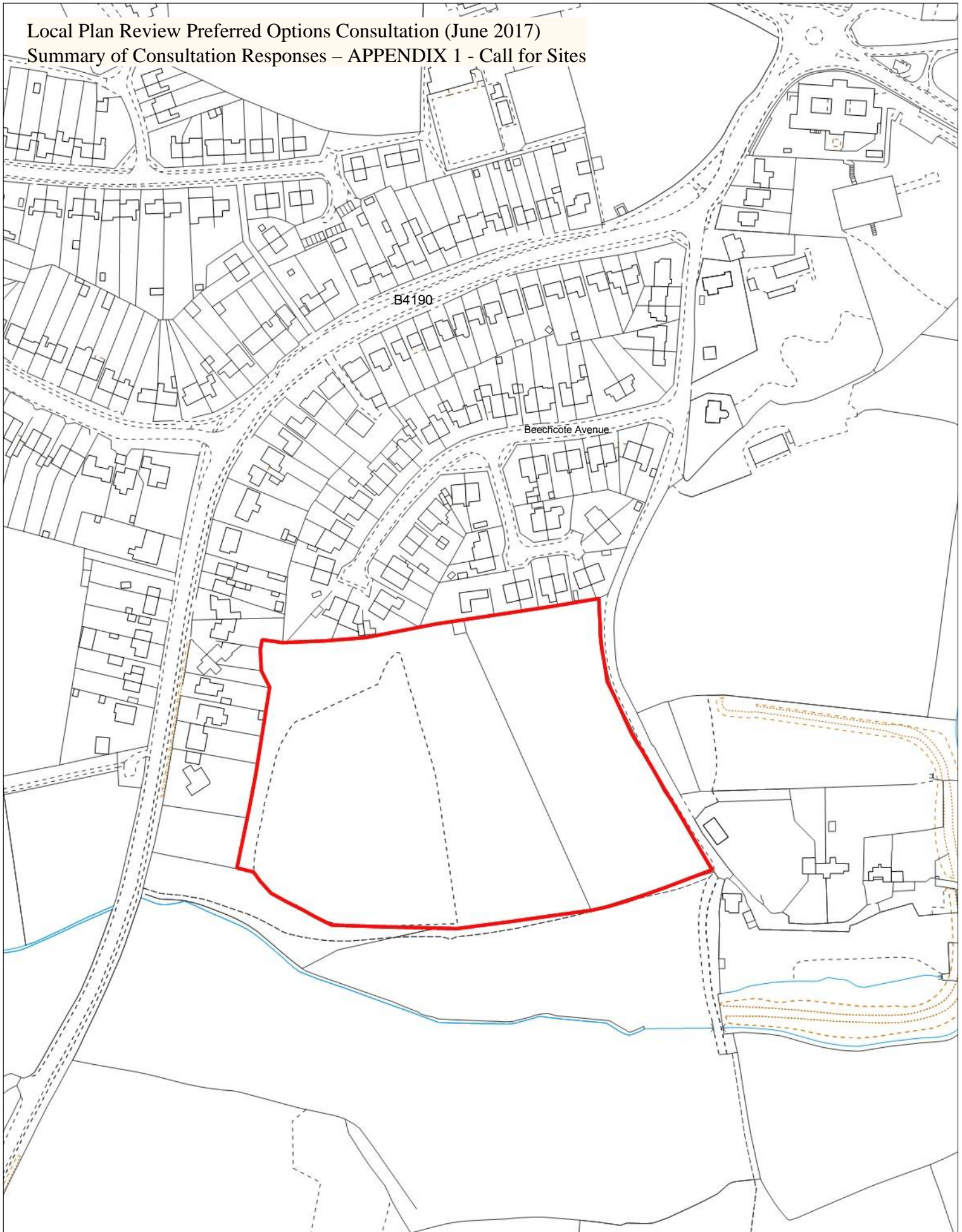
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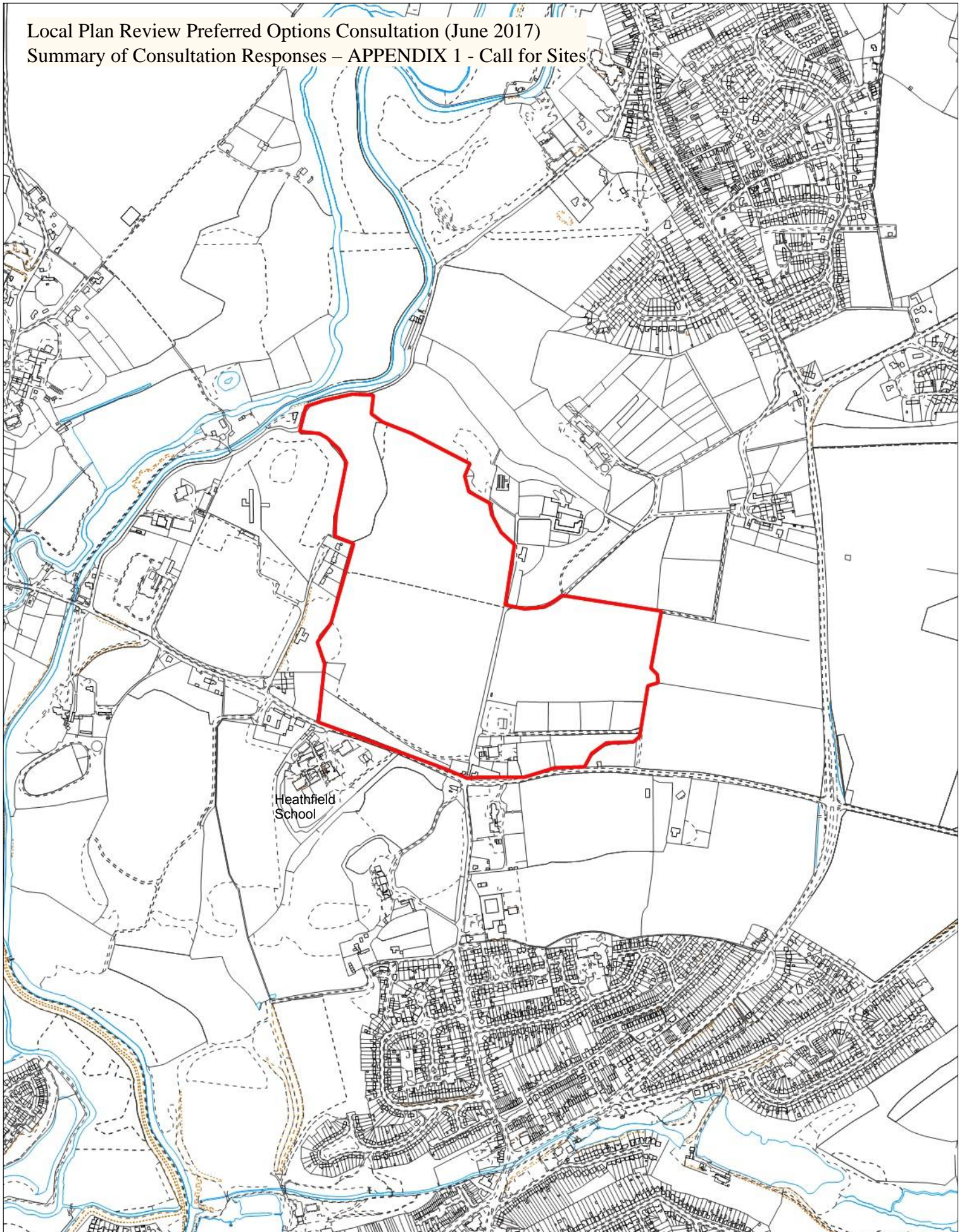
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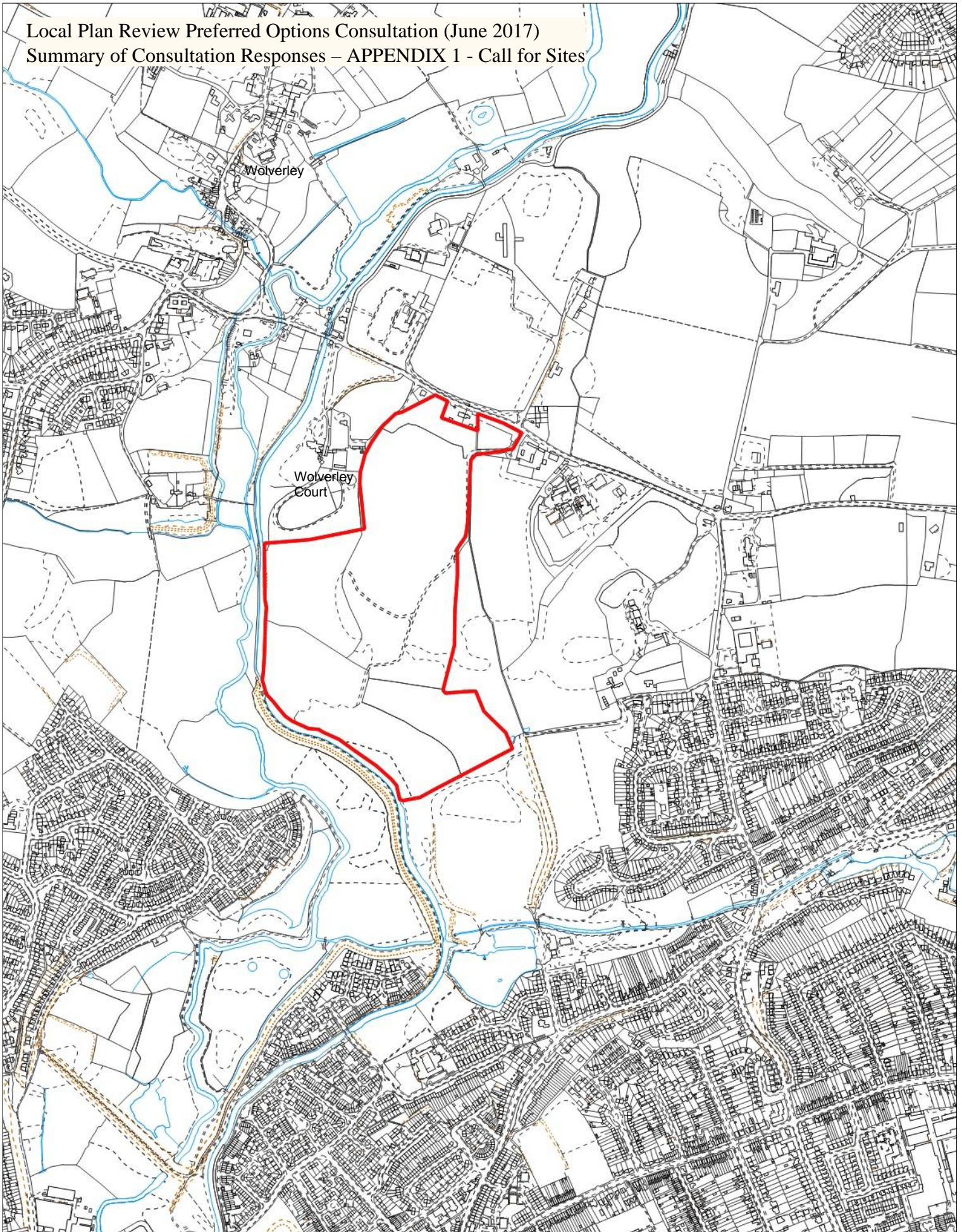
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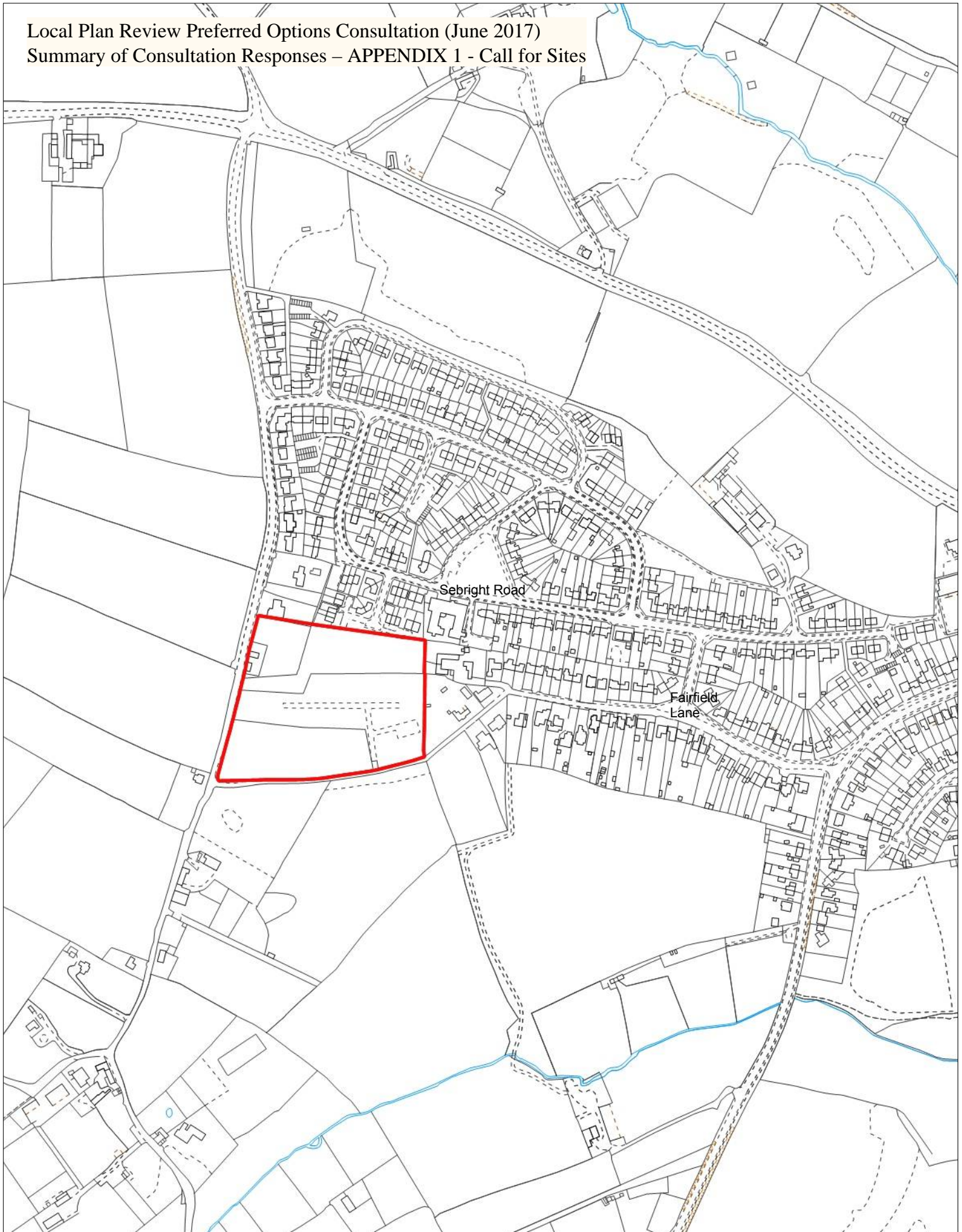


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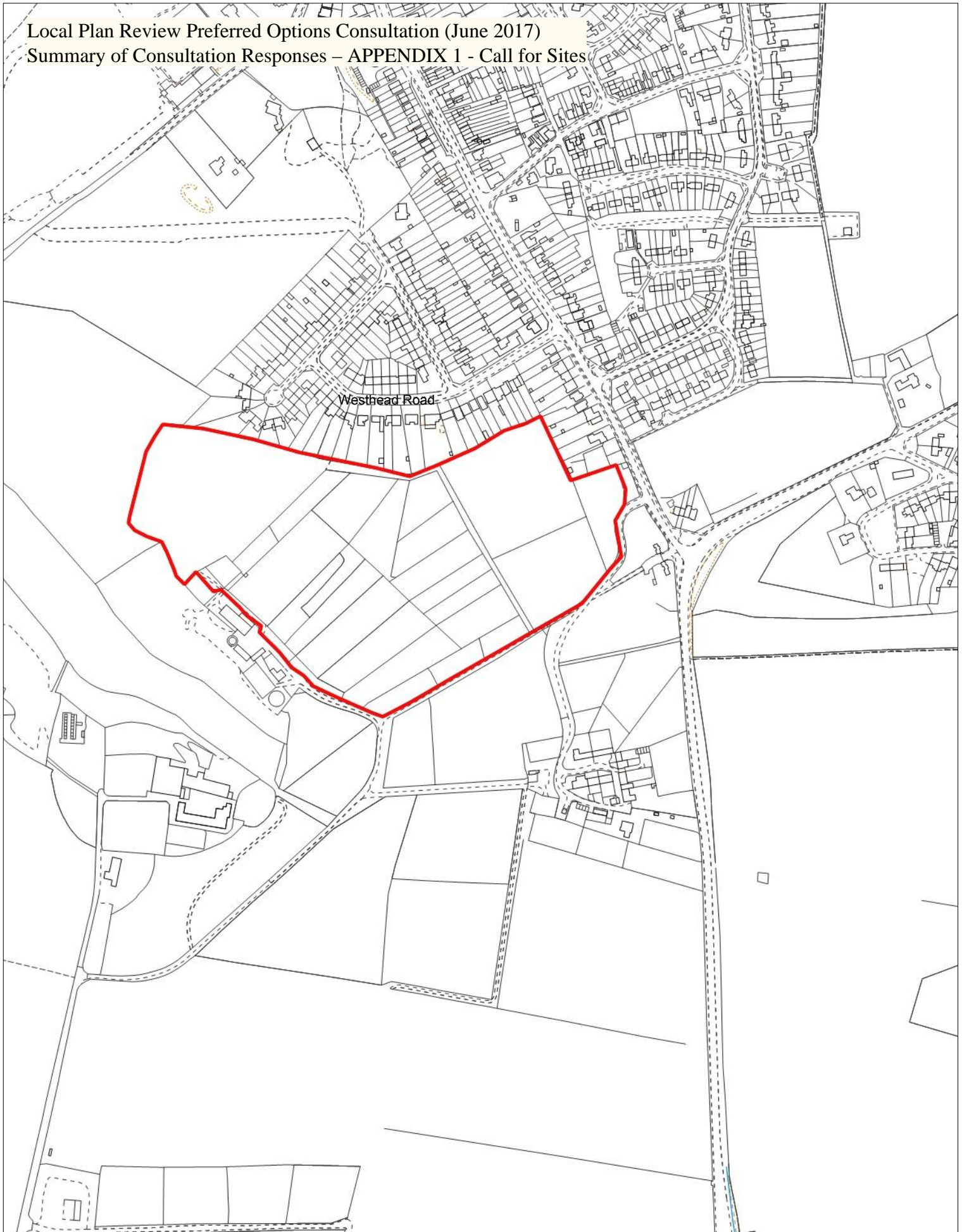
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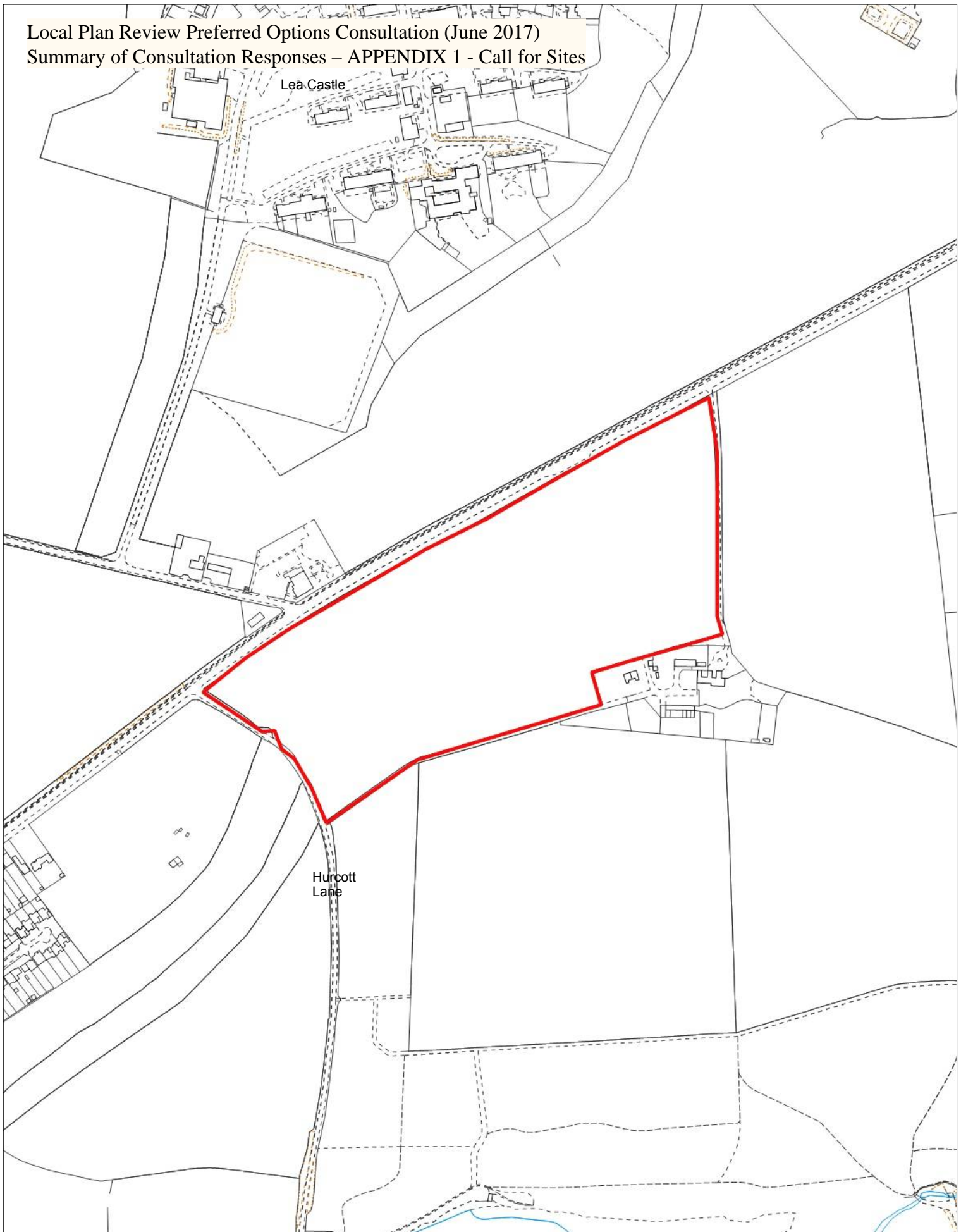
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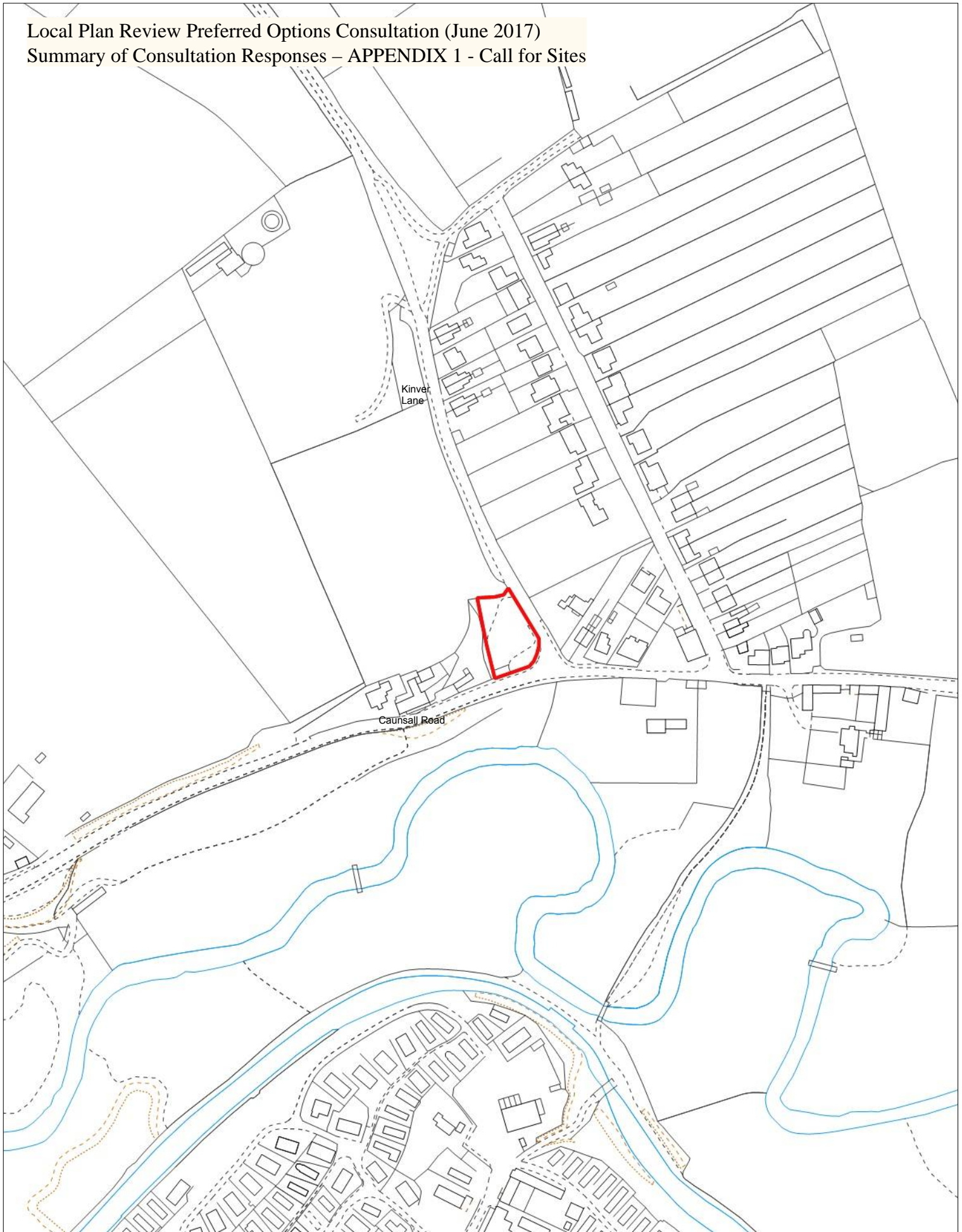
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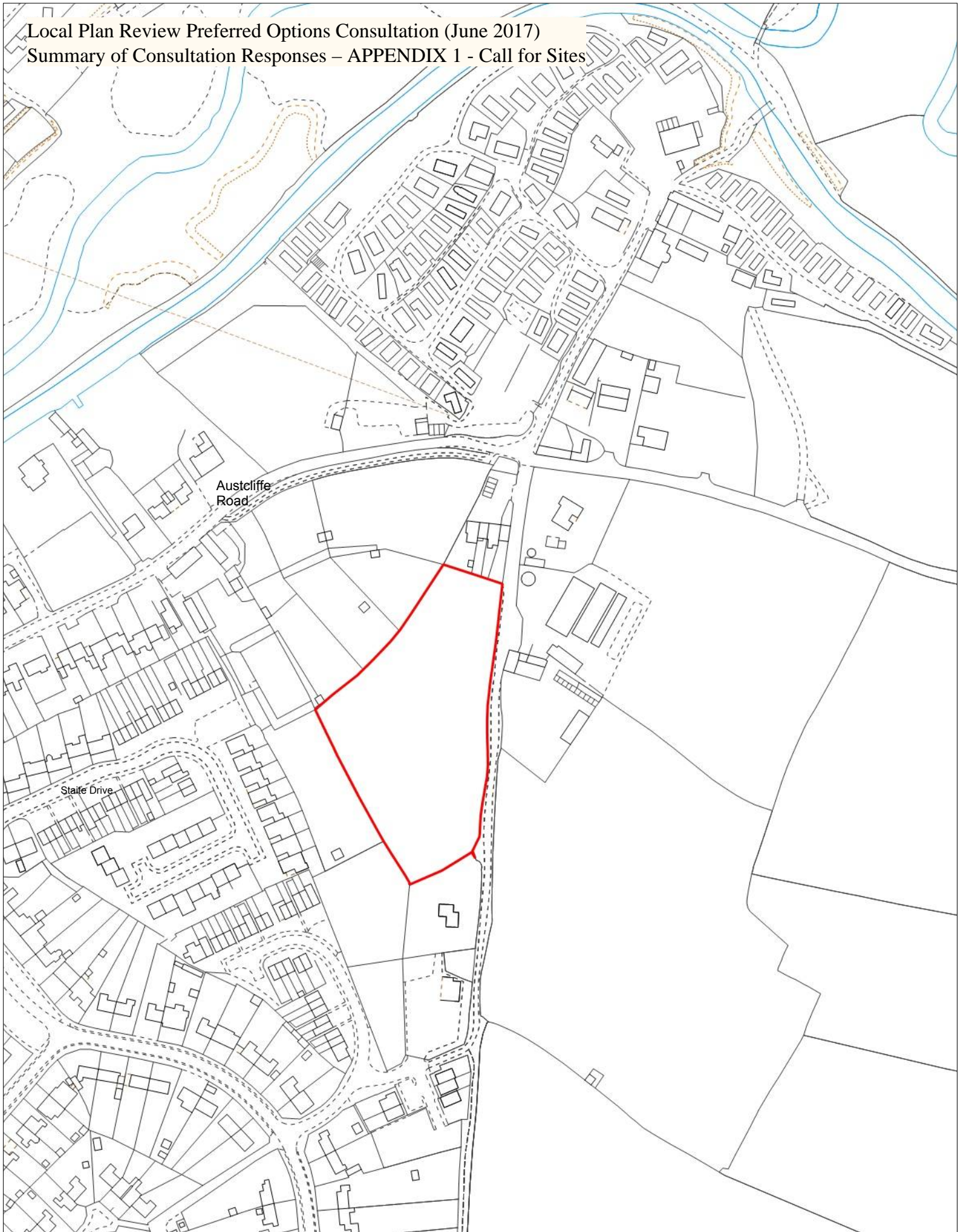
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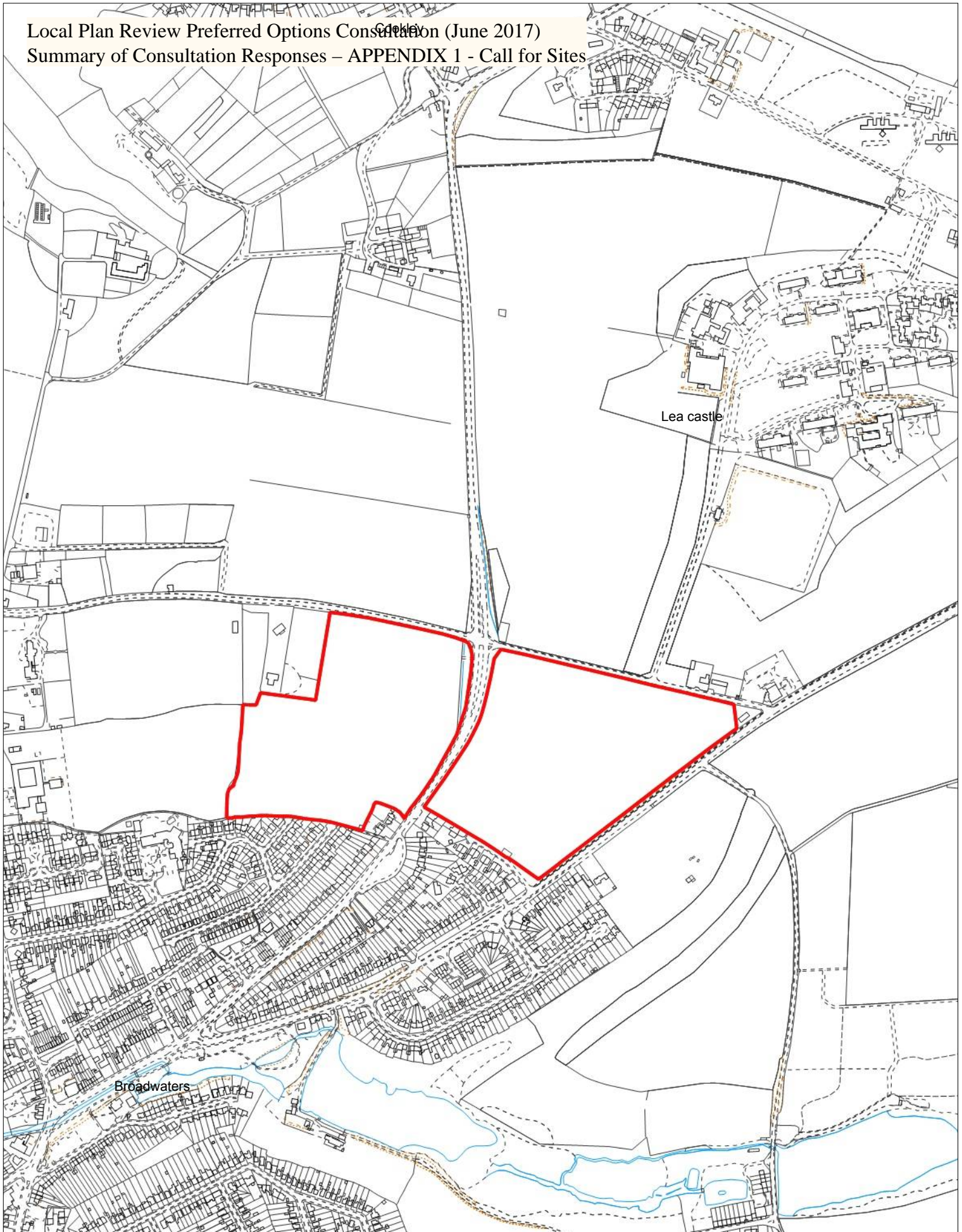
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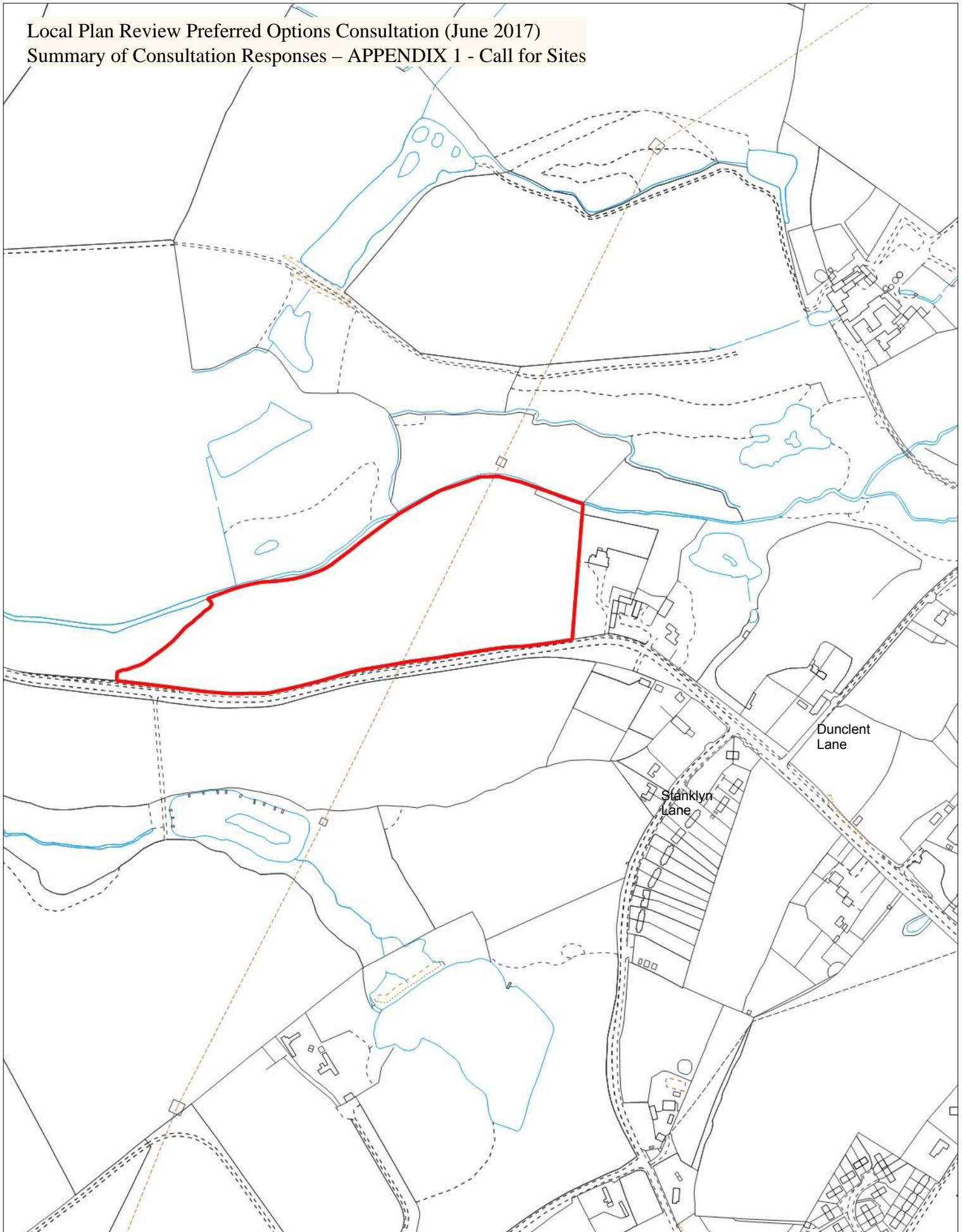


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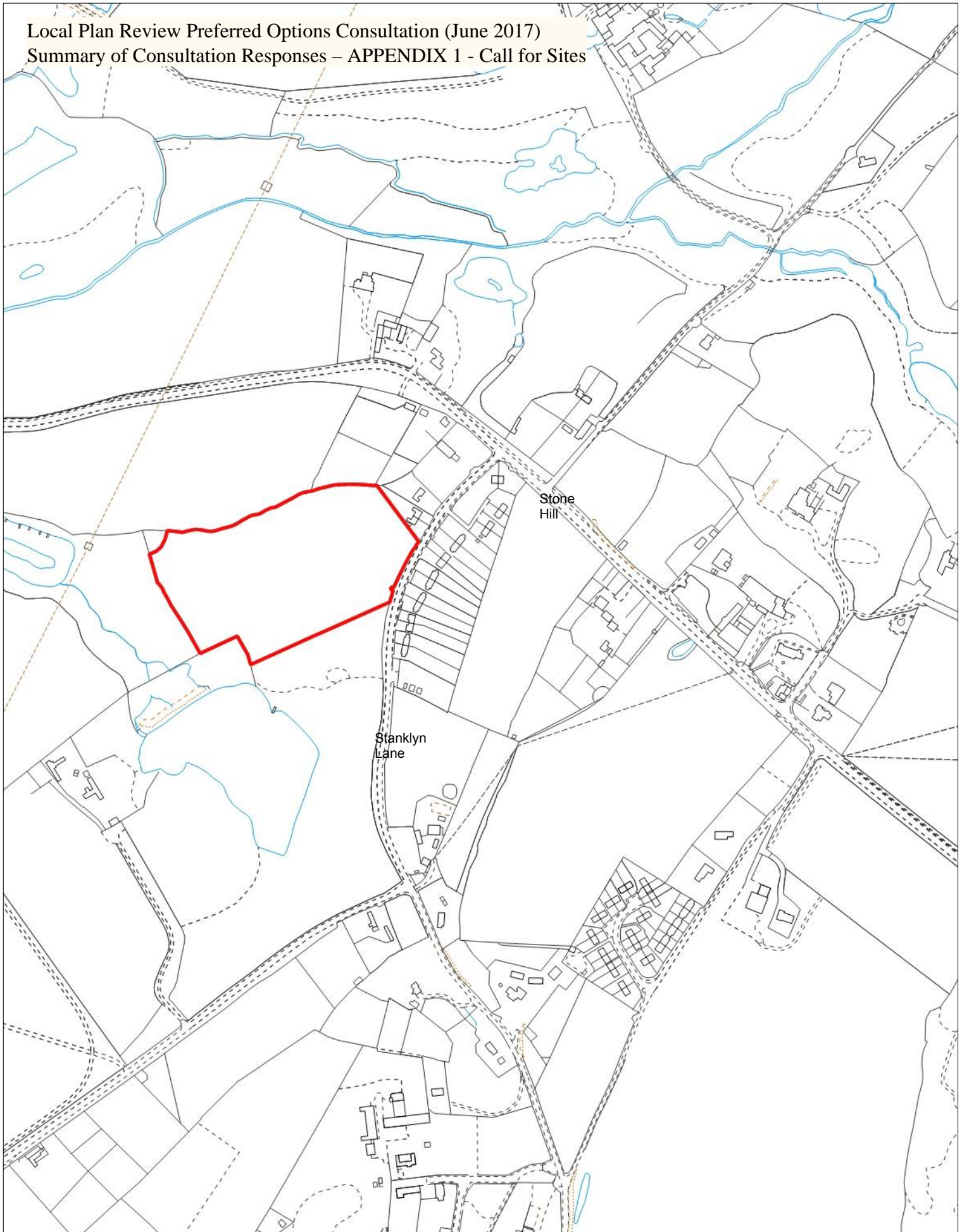




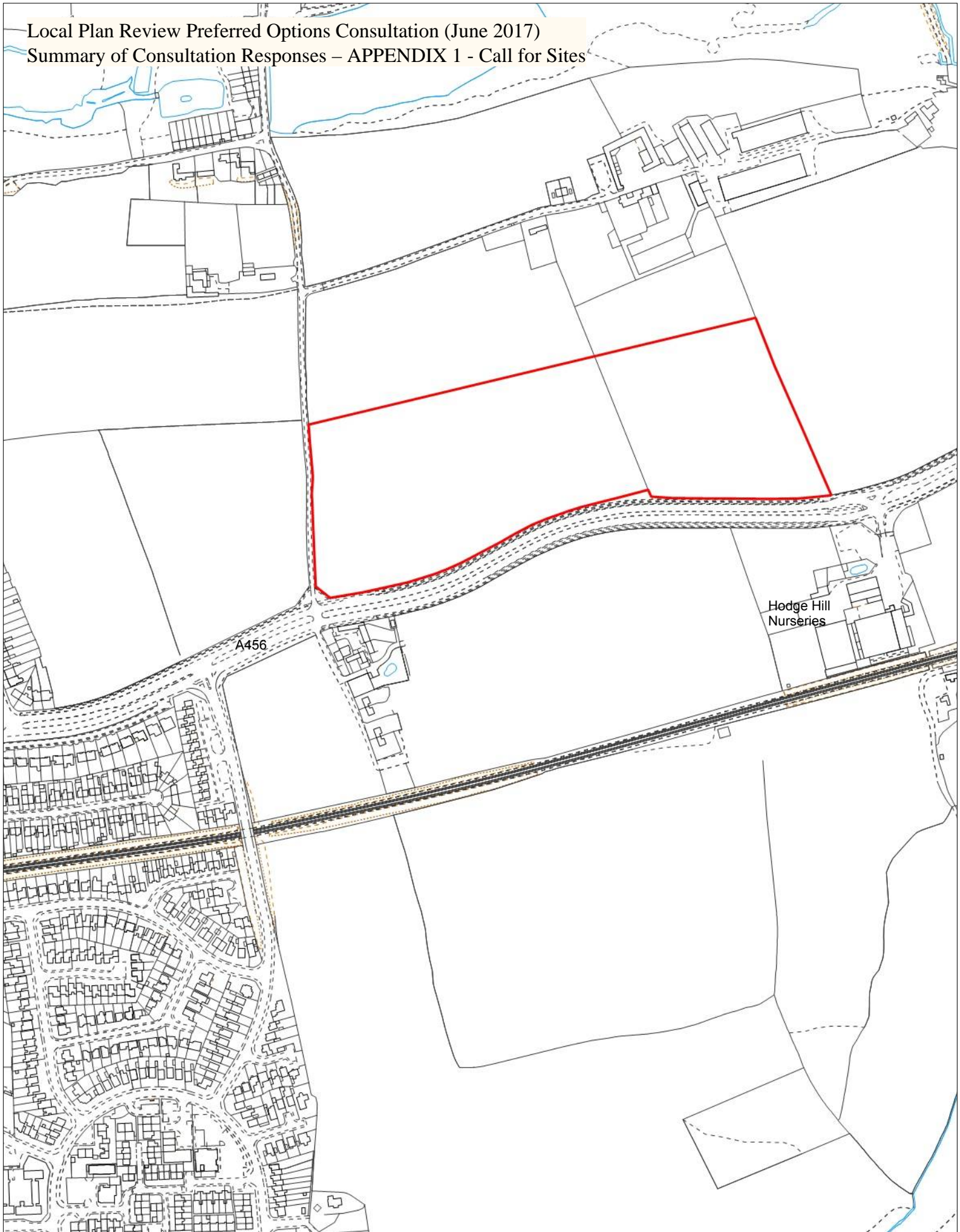
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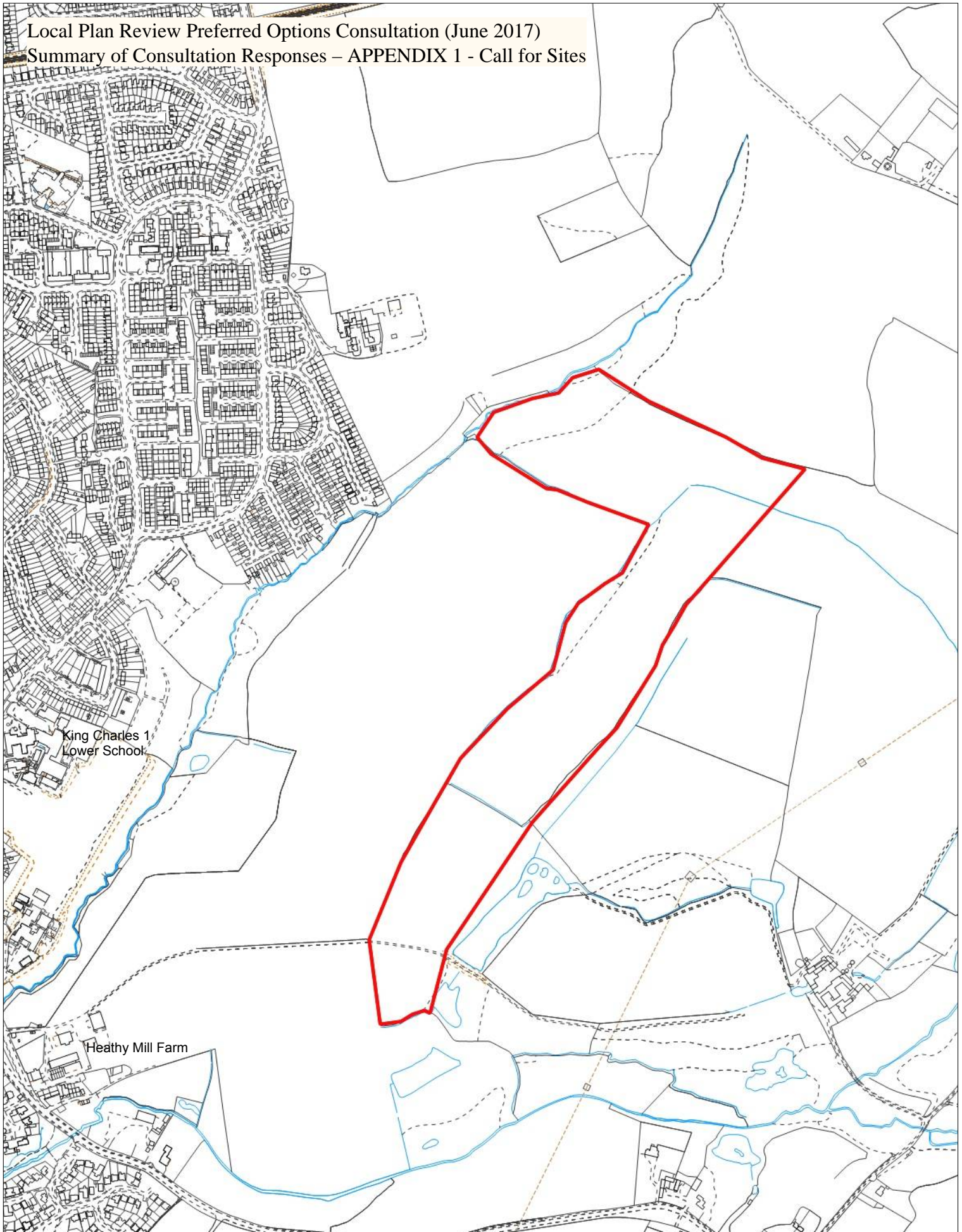
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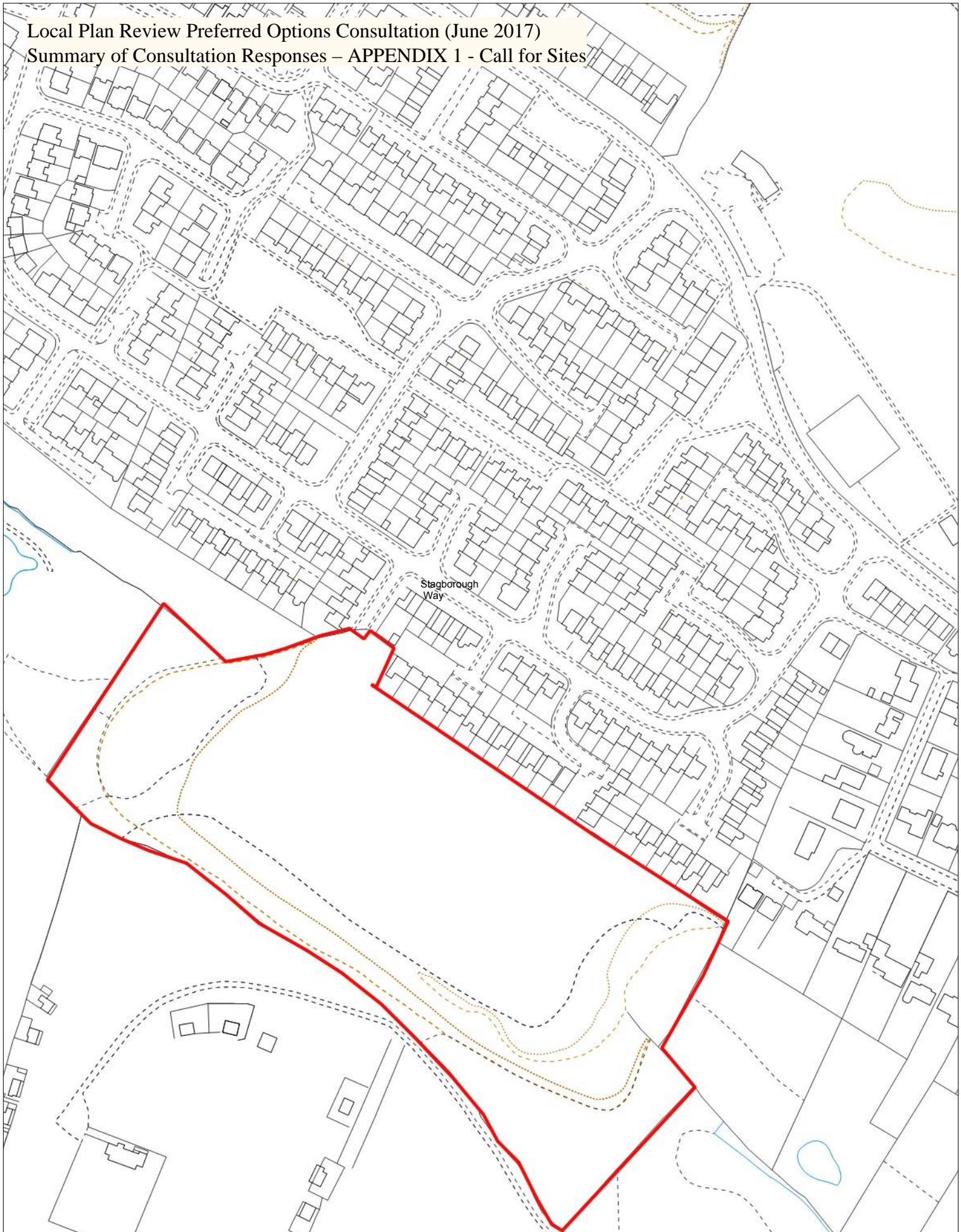
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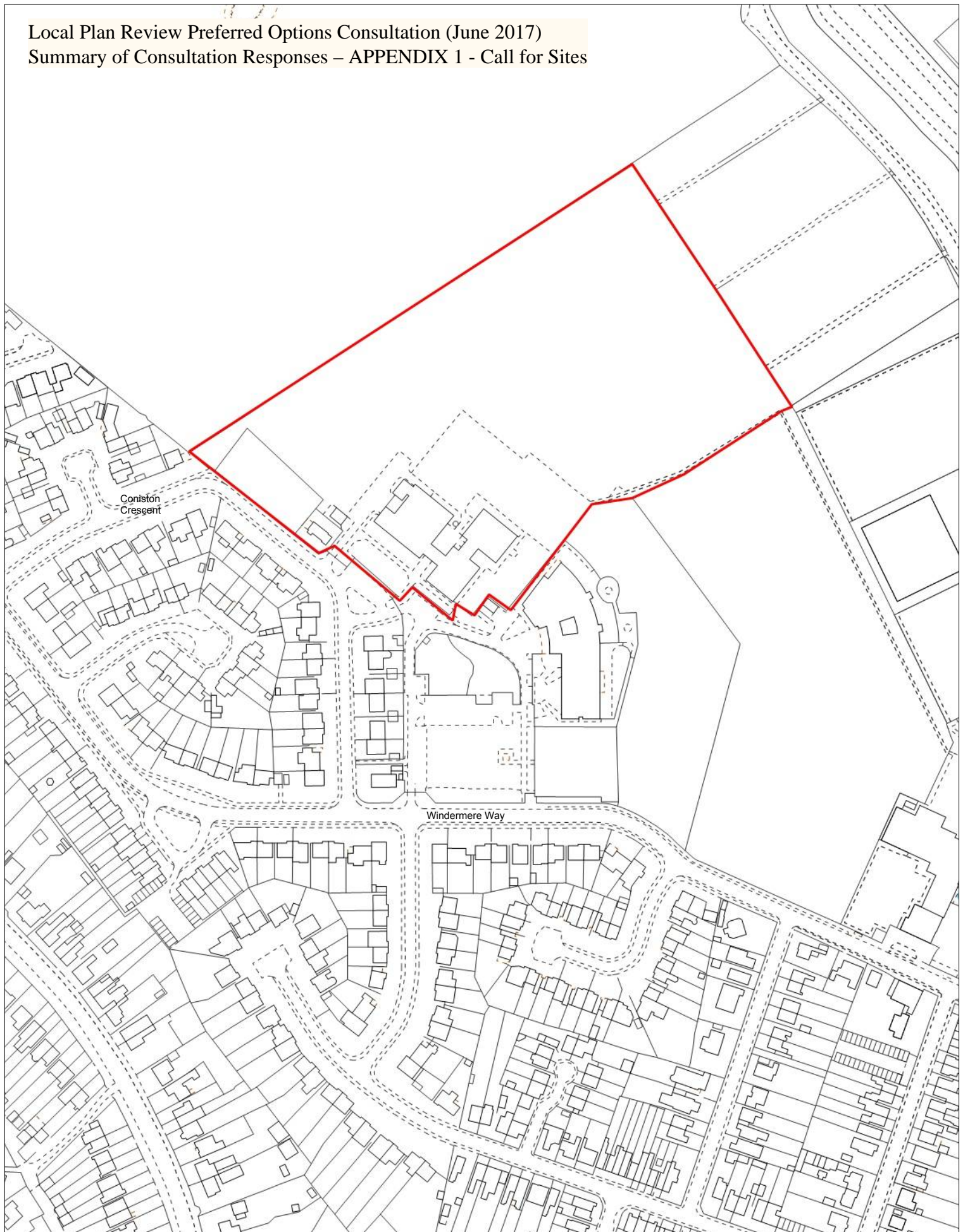
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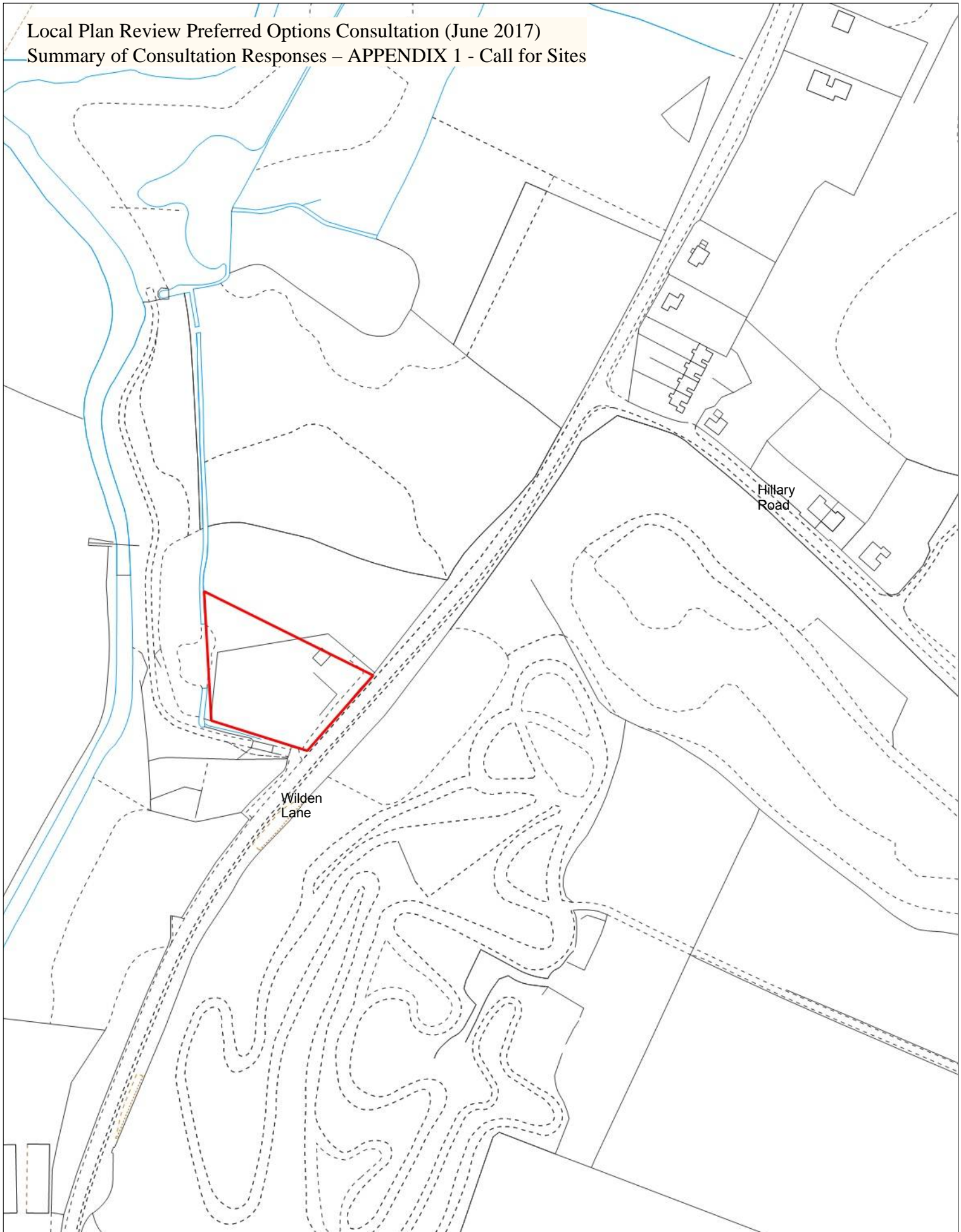
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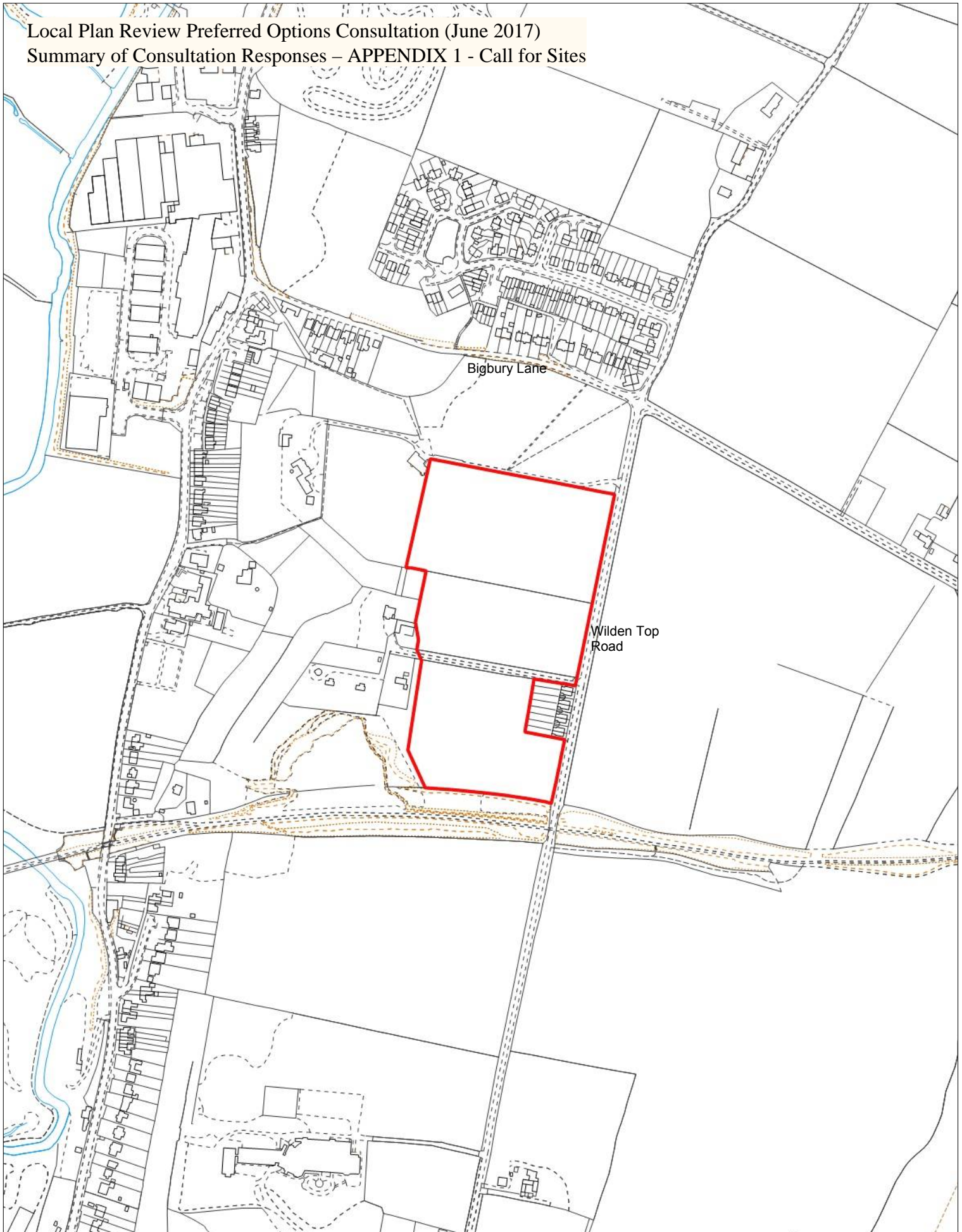


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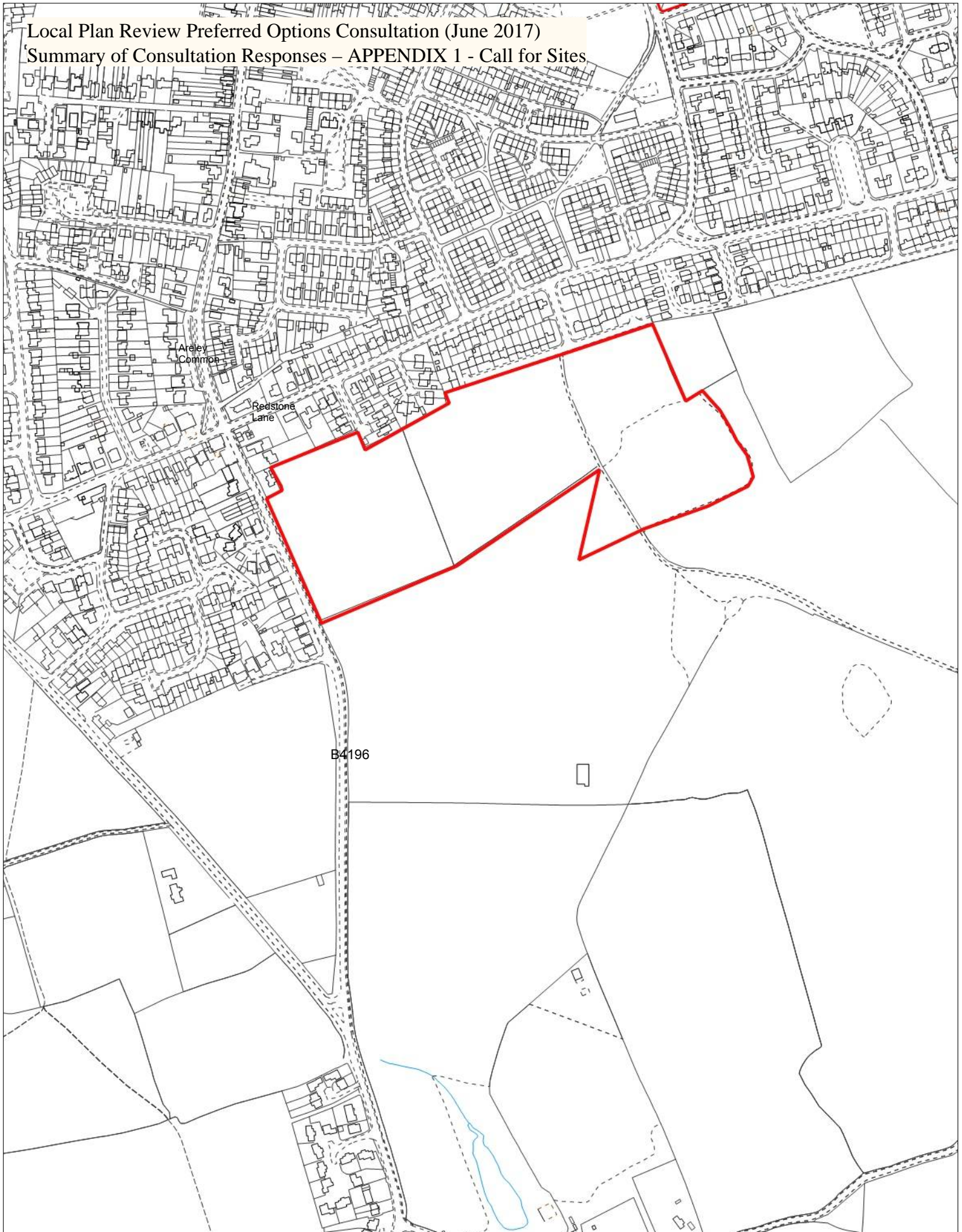




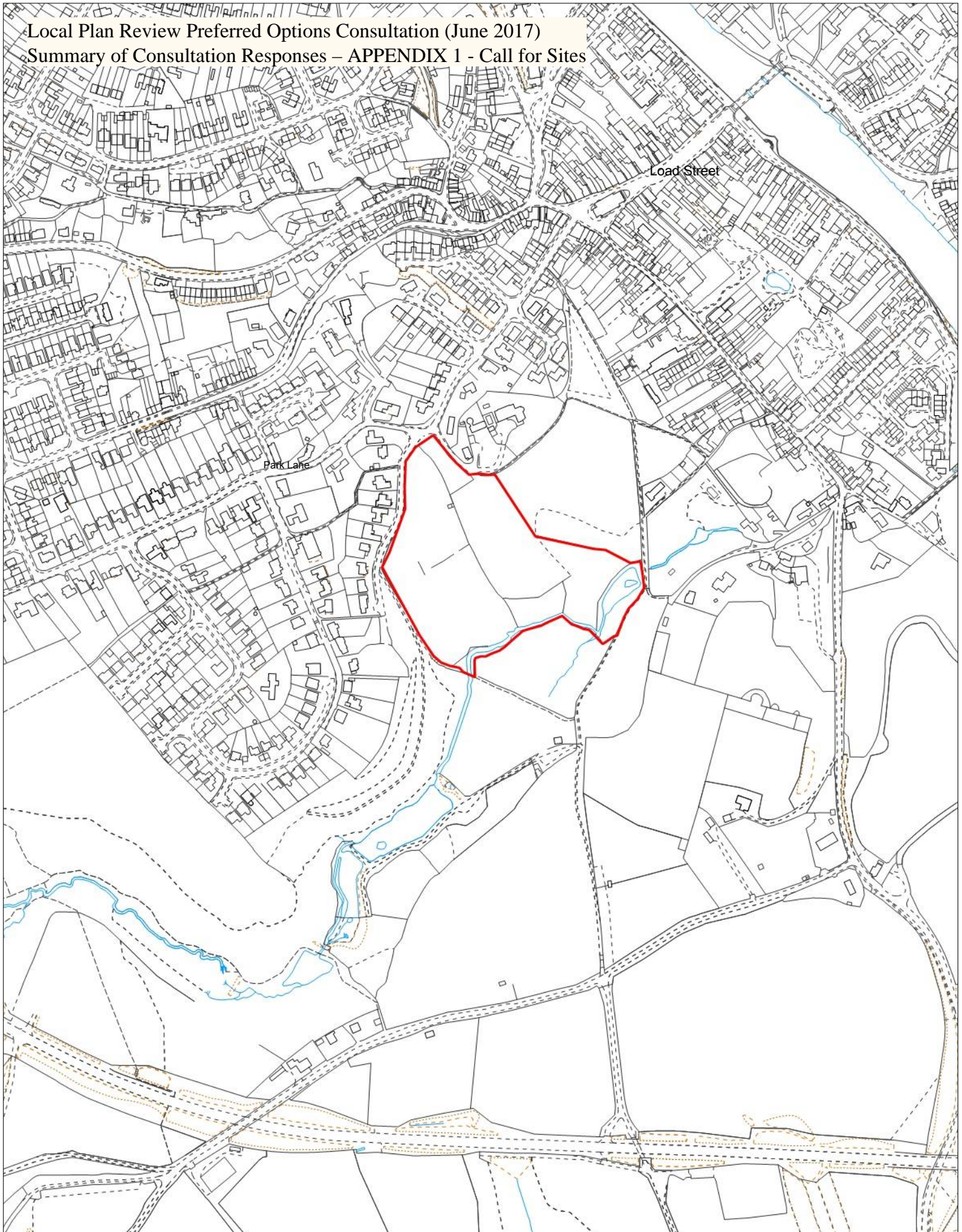
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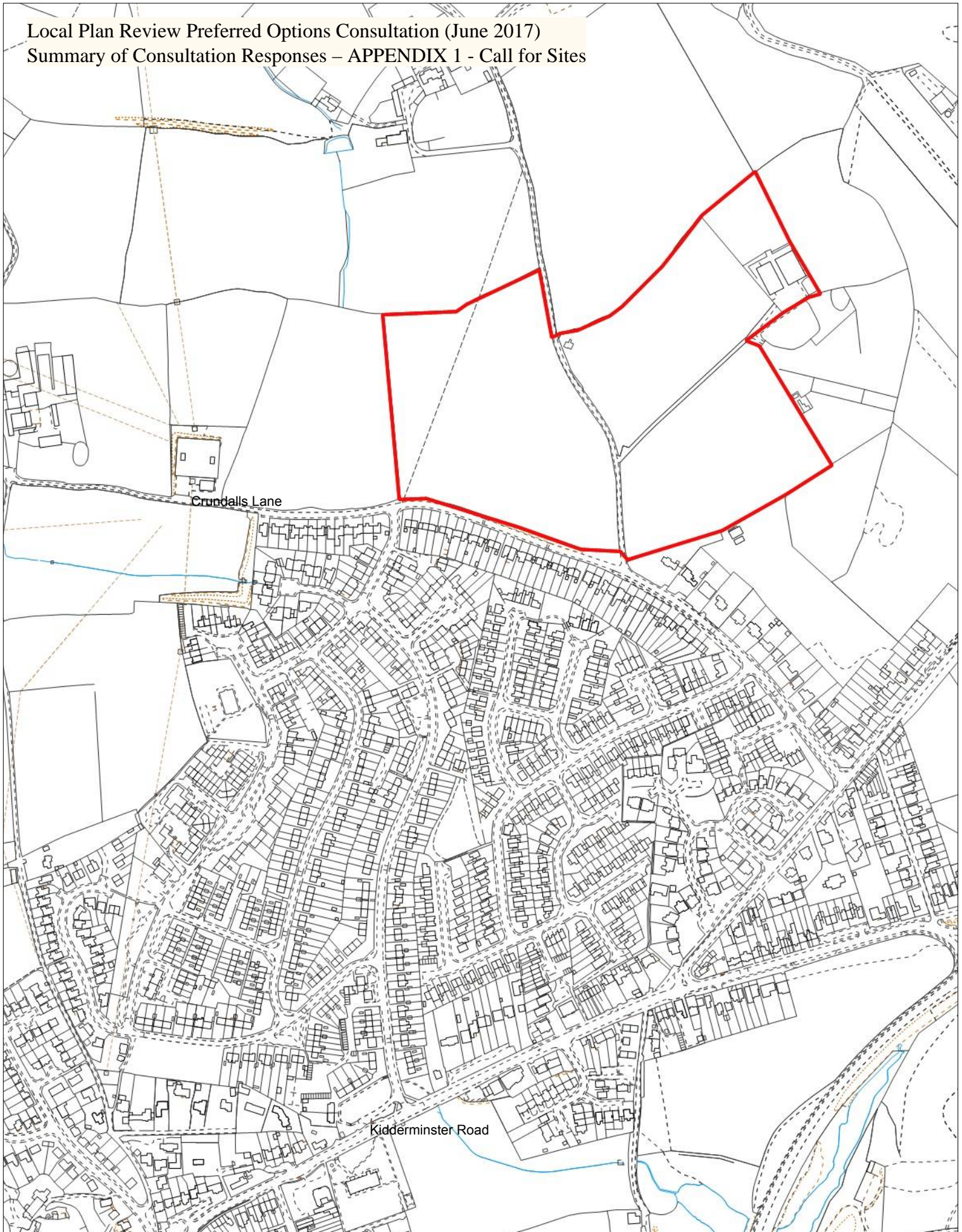
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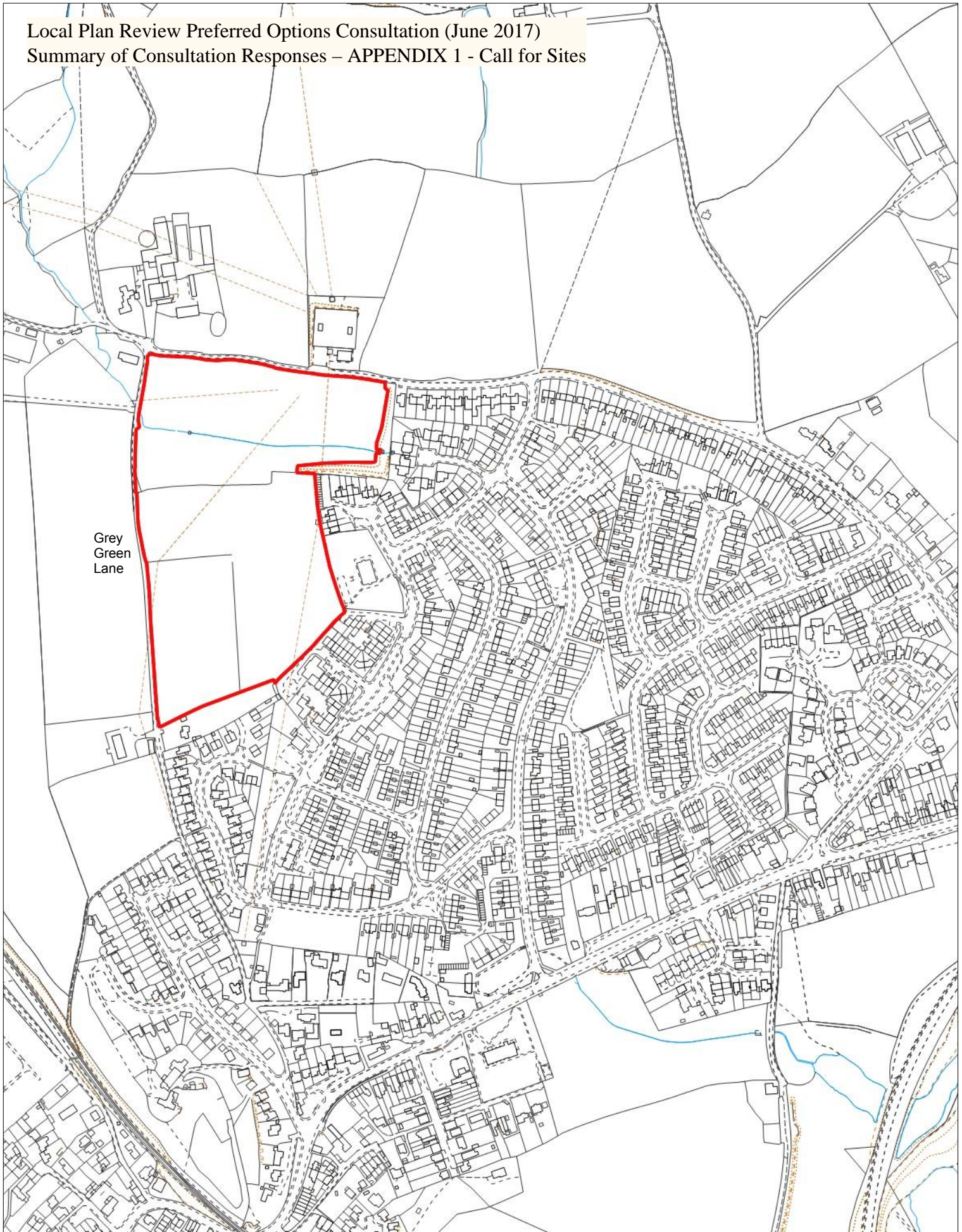
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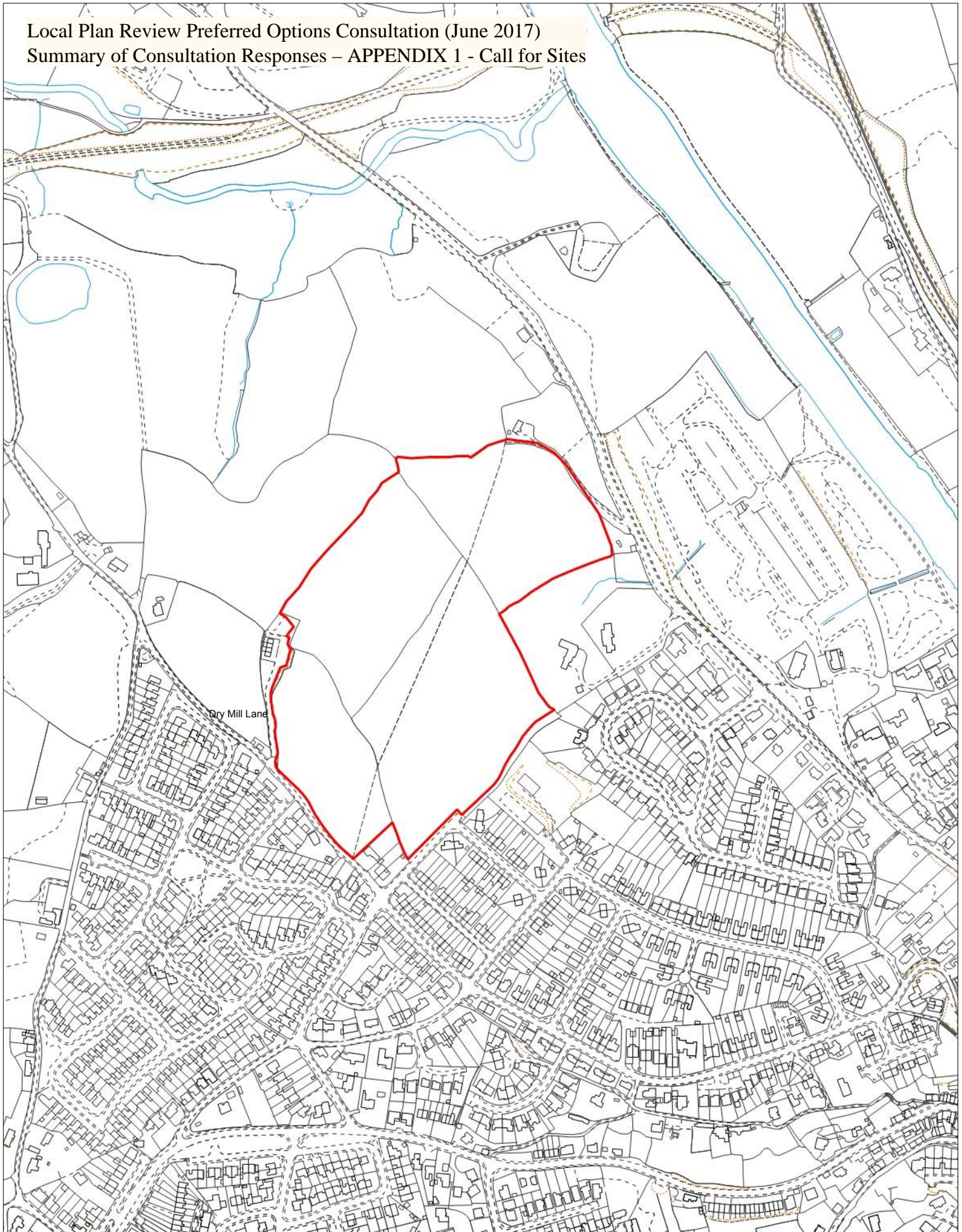
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Grey Green Lane



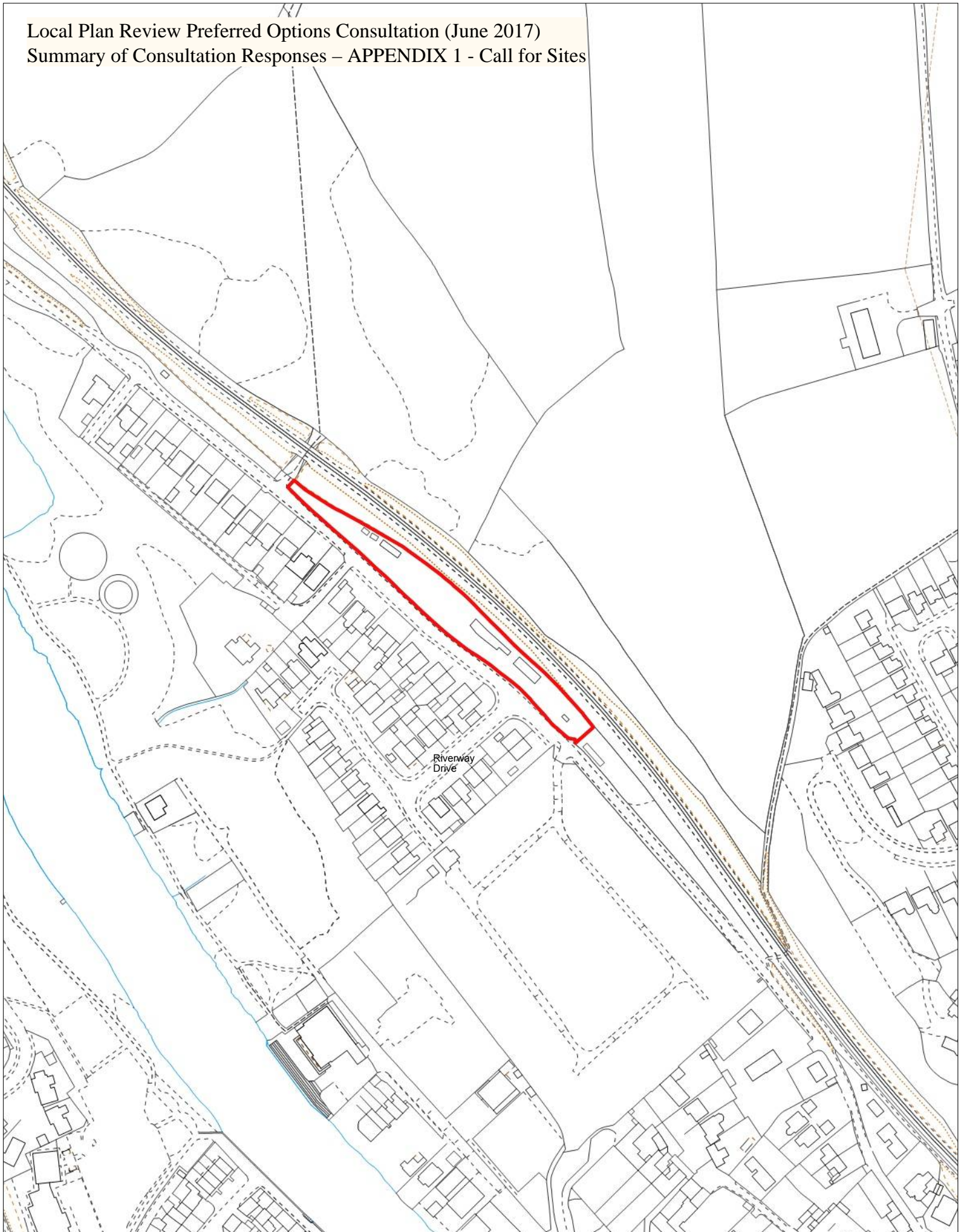
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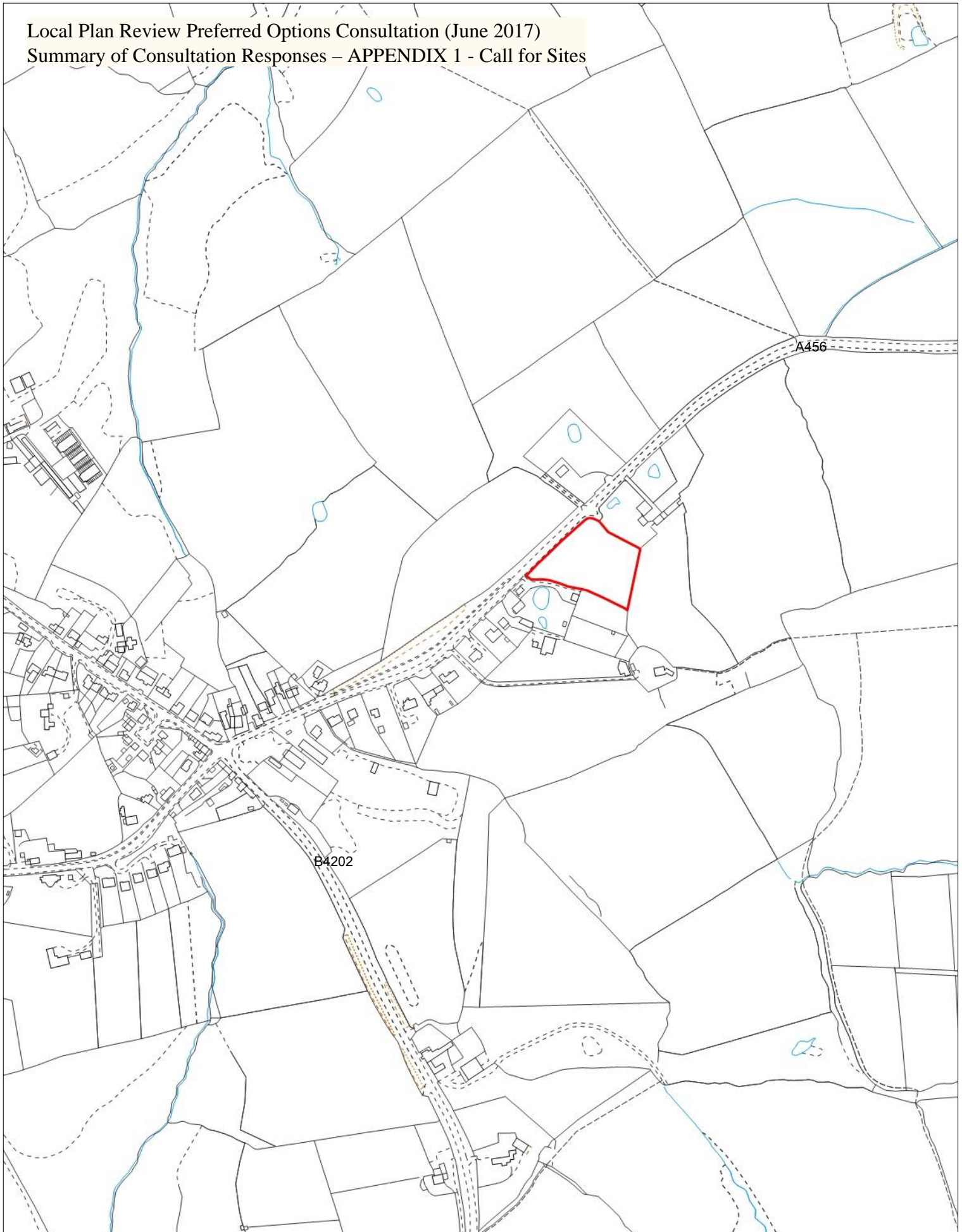
Dry Mill Lane



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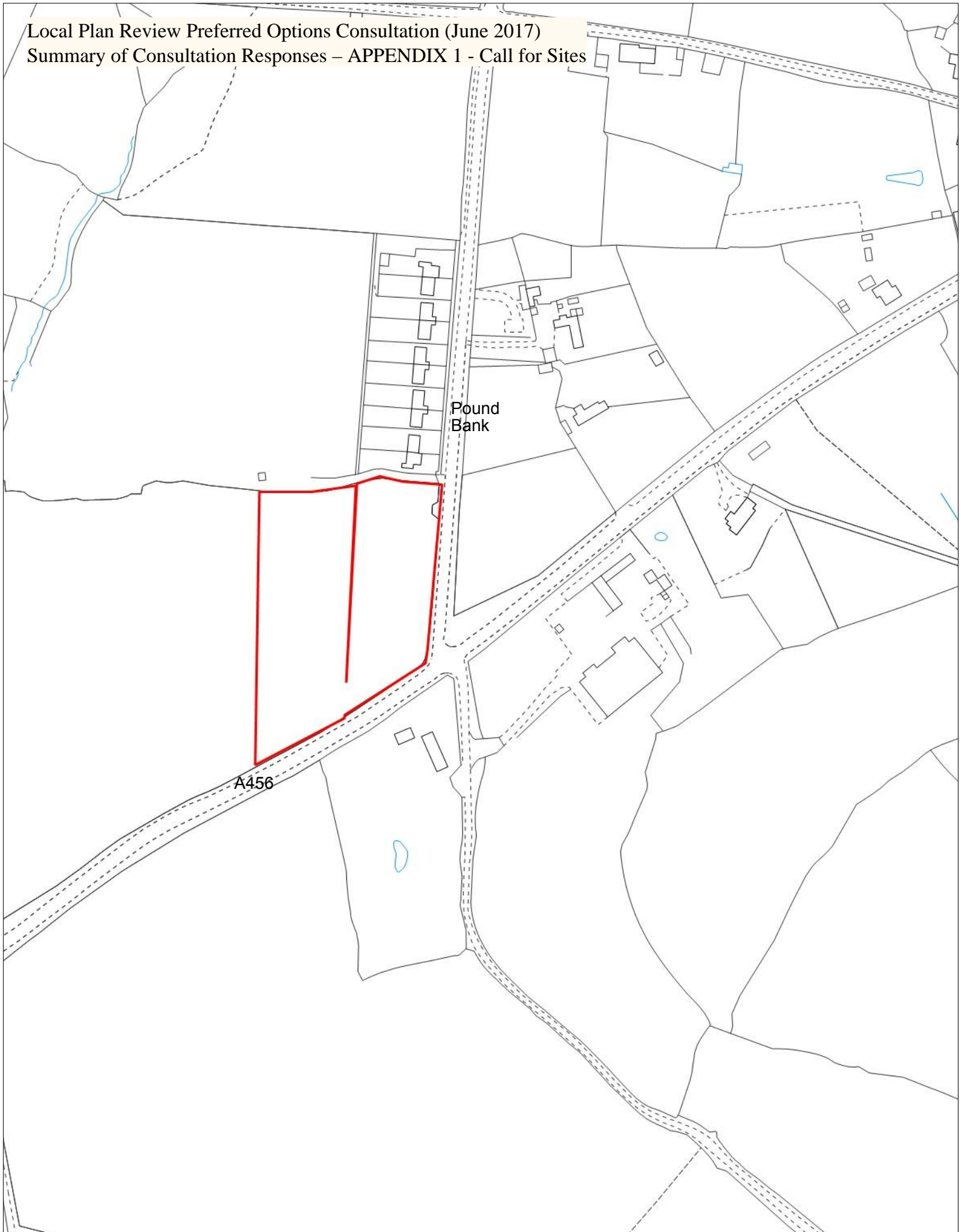


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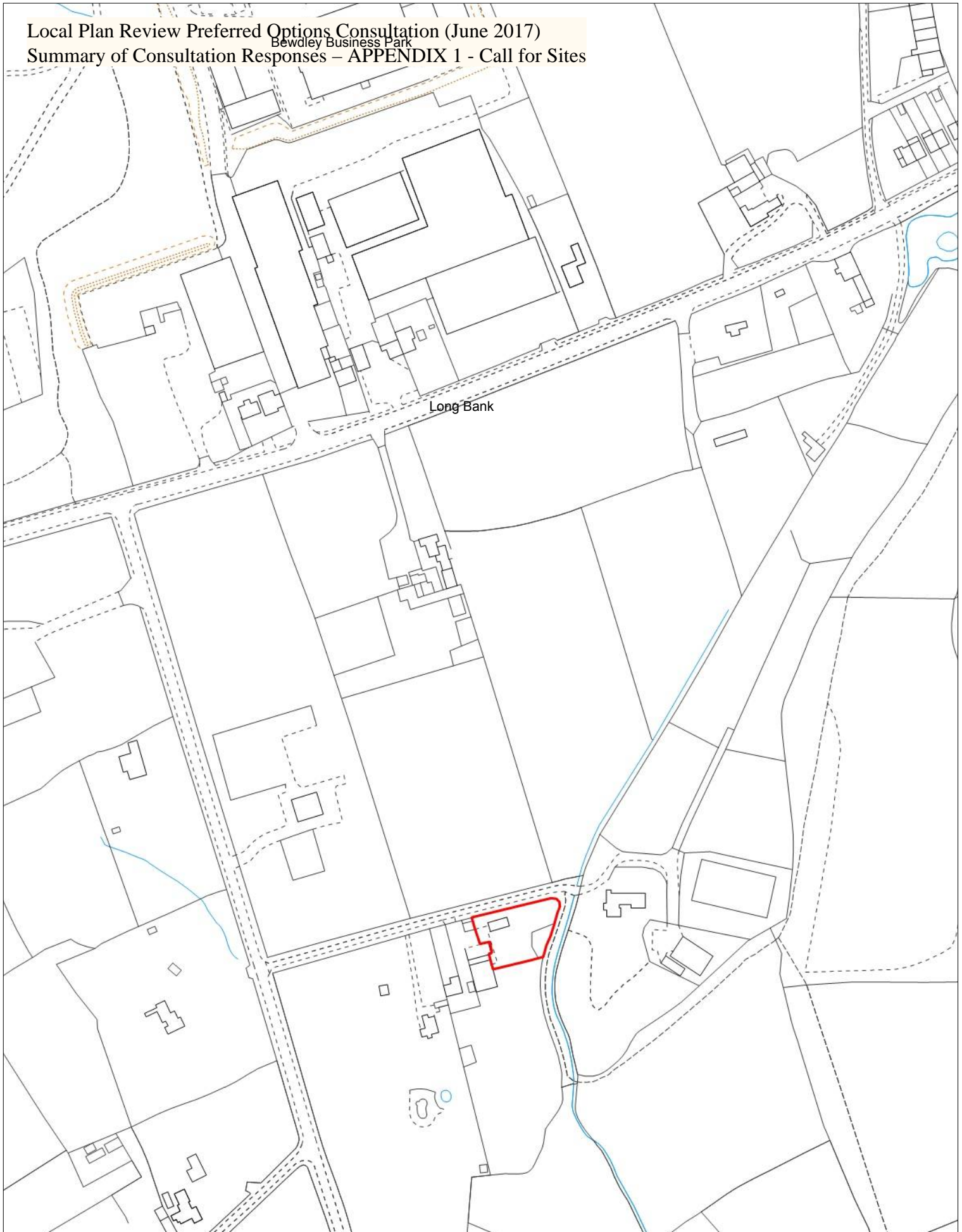




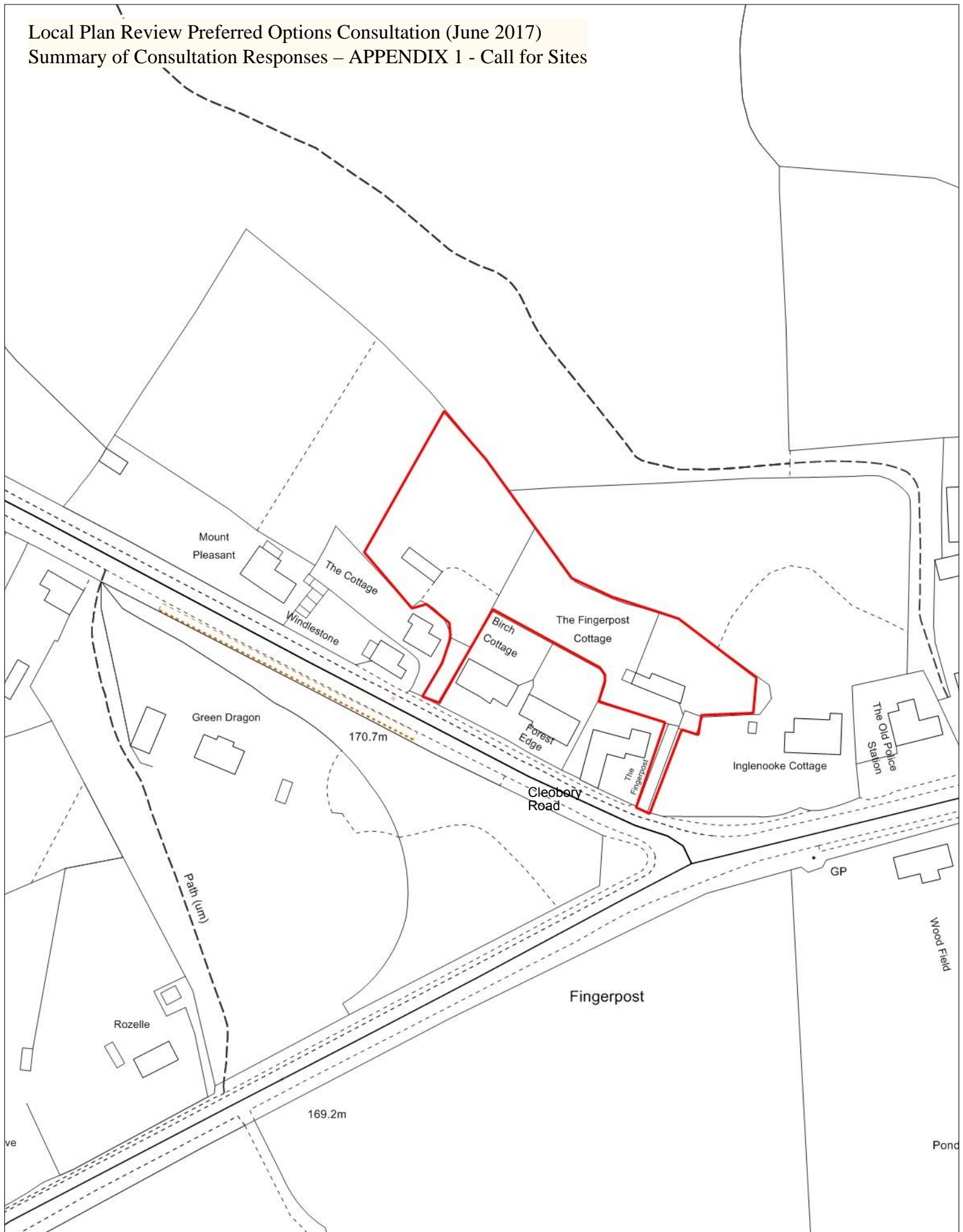
Local Plan Review Preferred Options Consultation (June 2017)  
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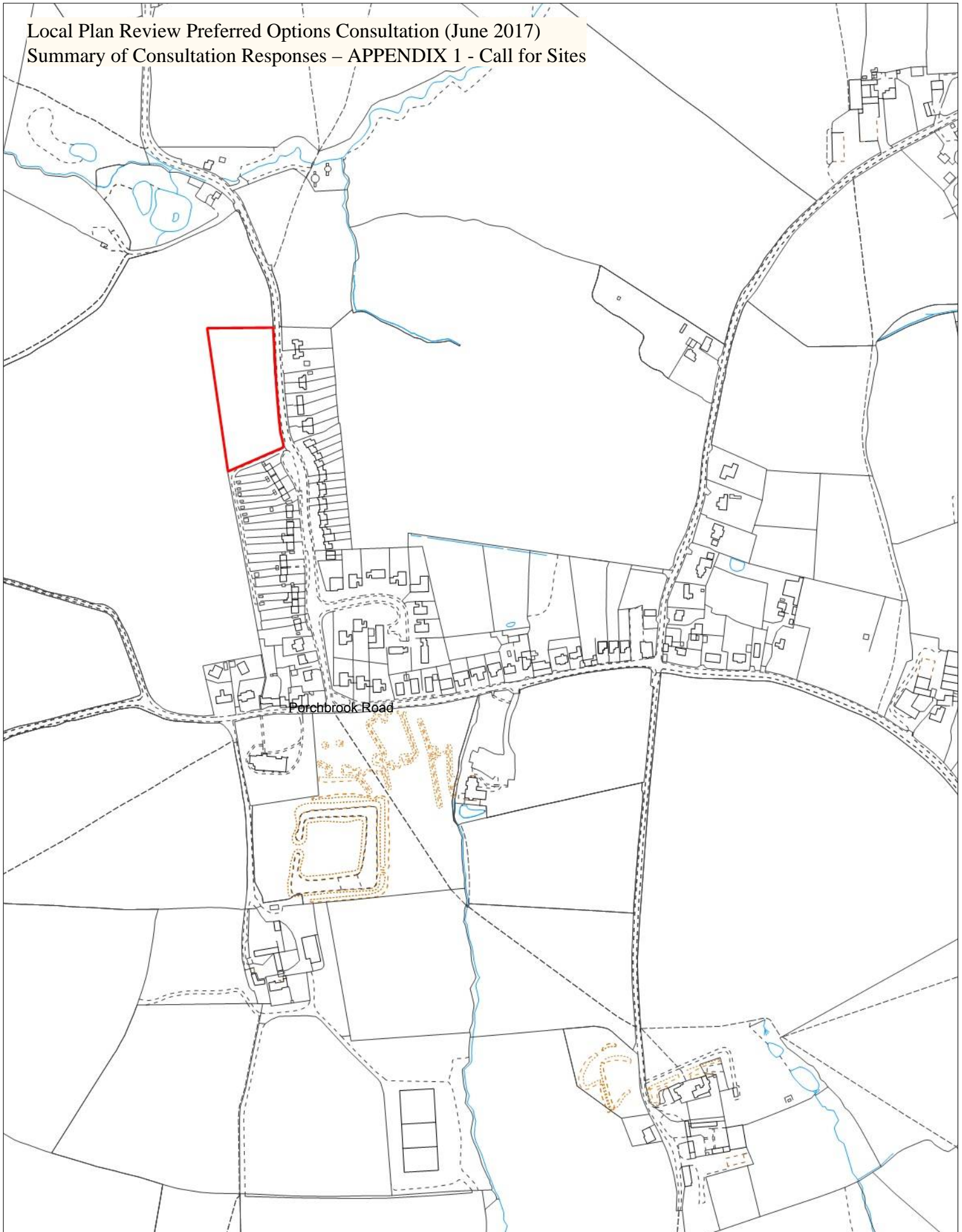
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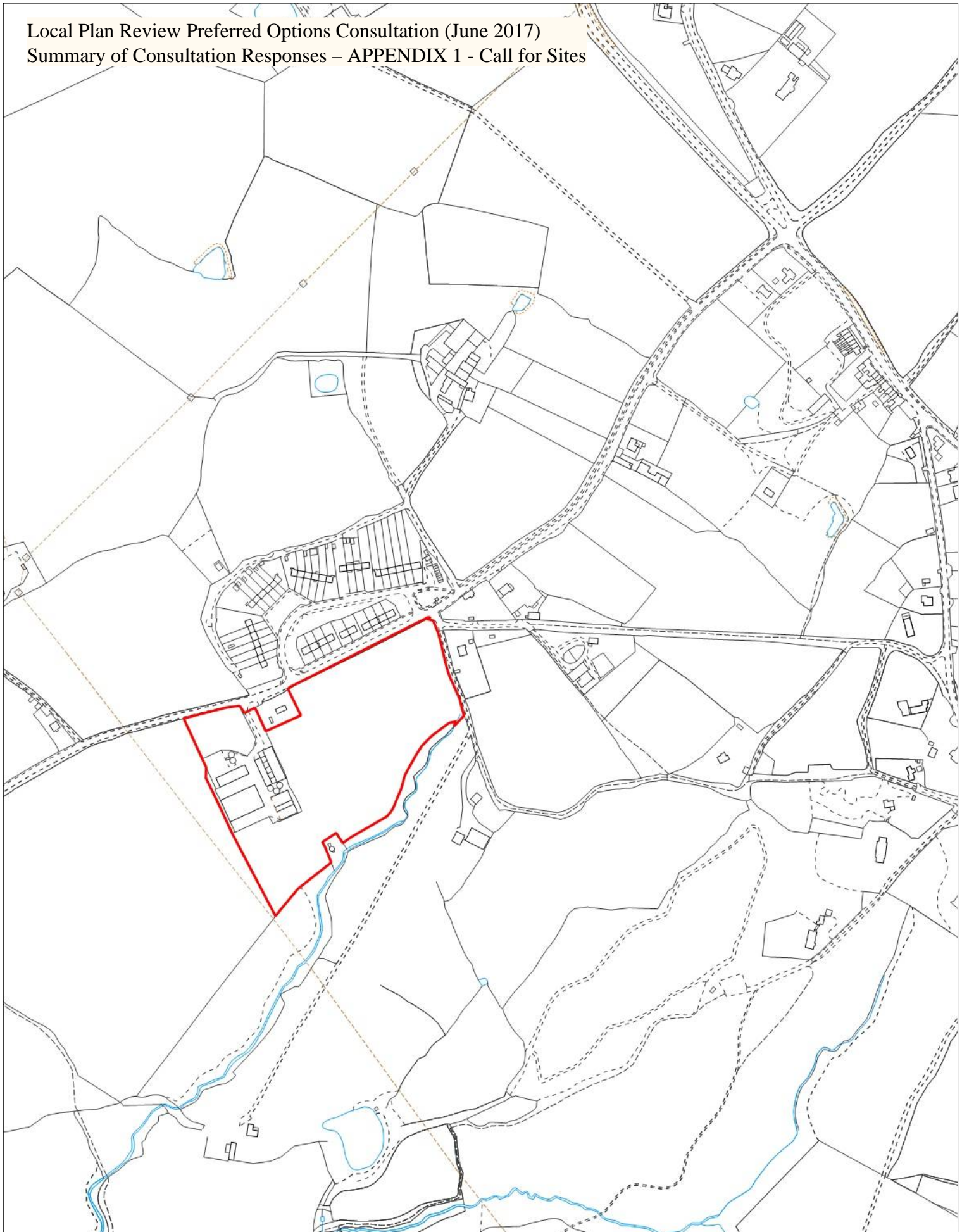
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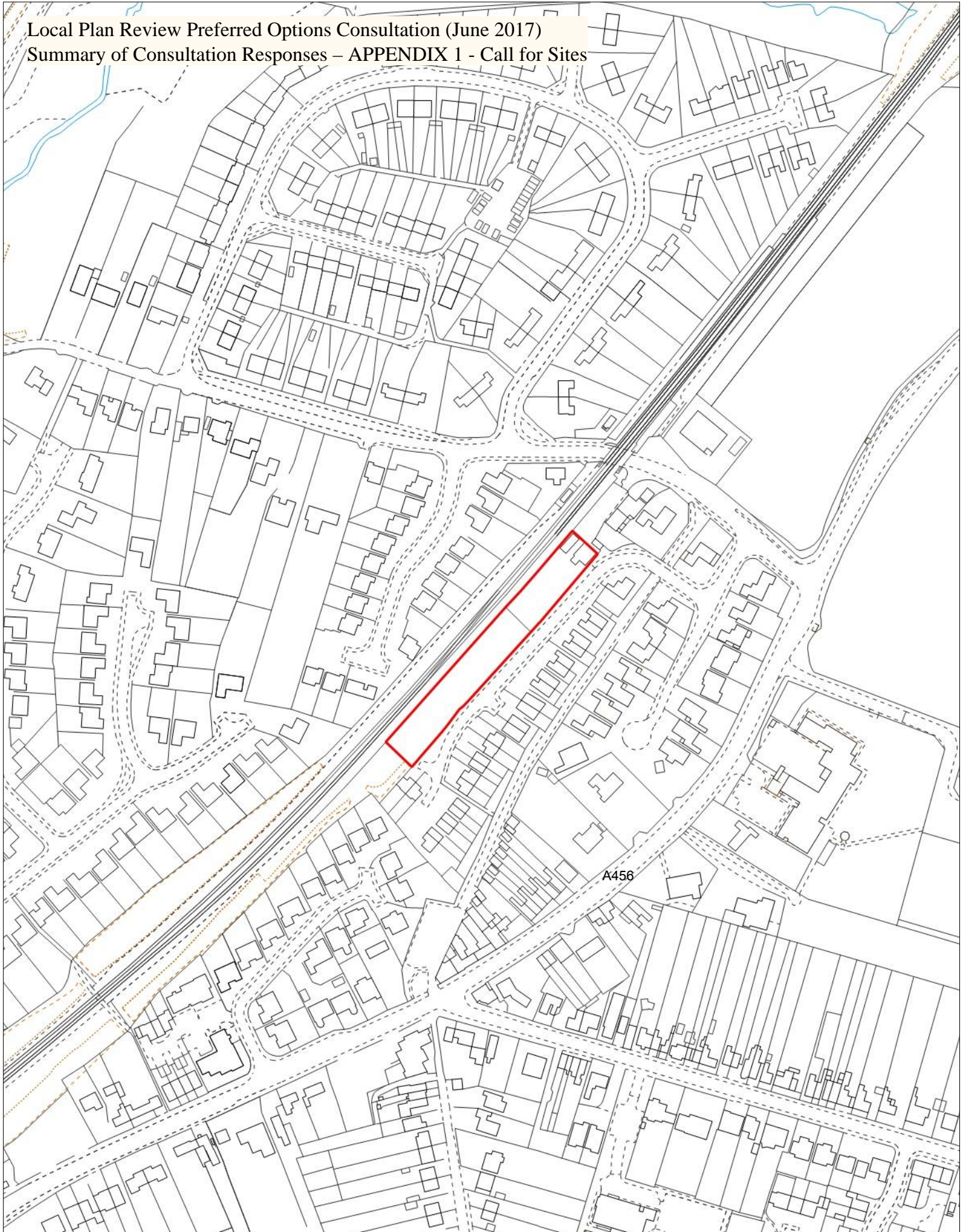
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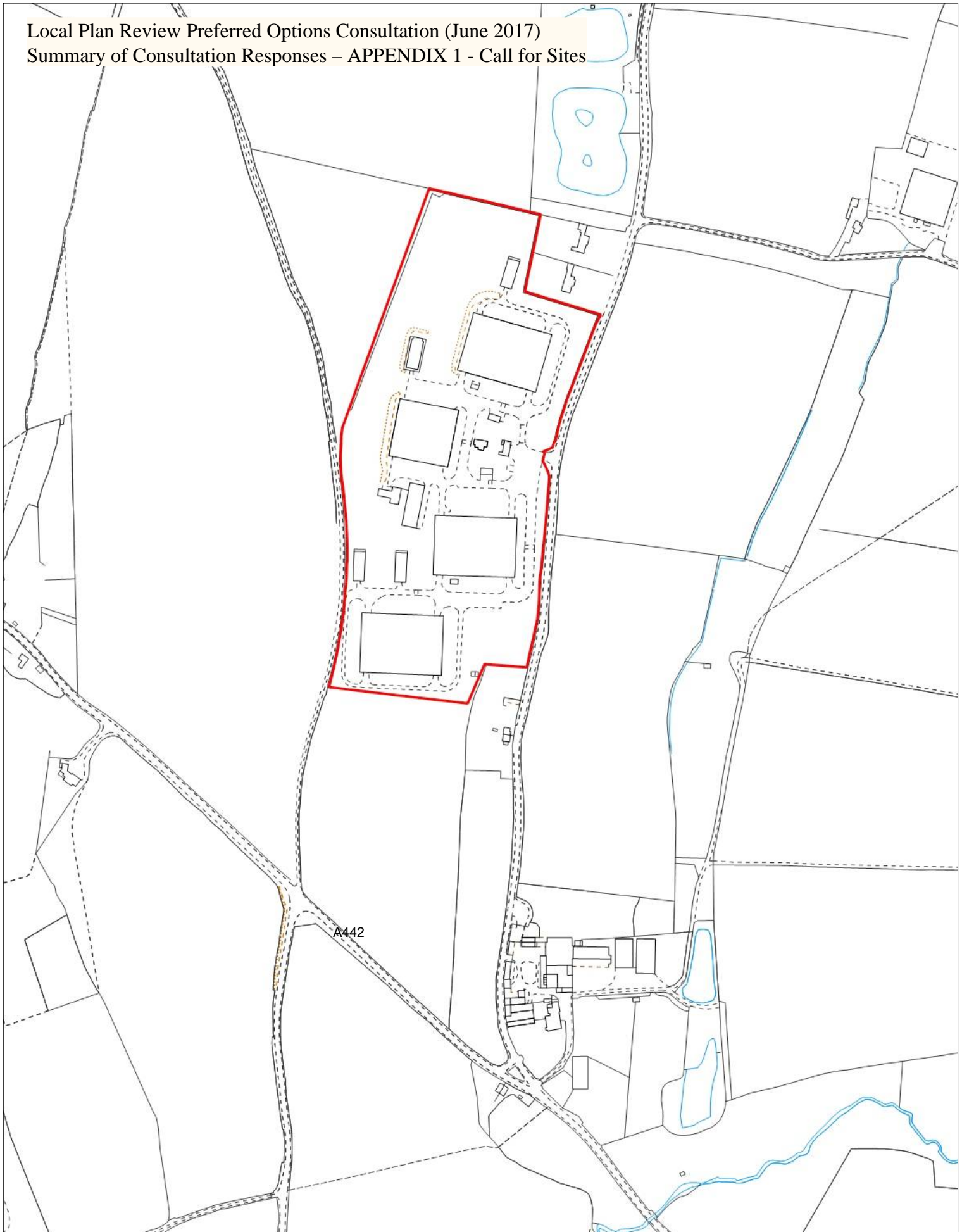
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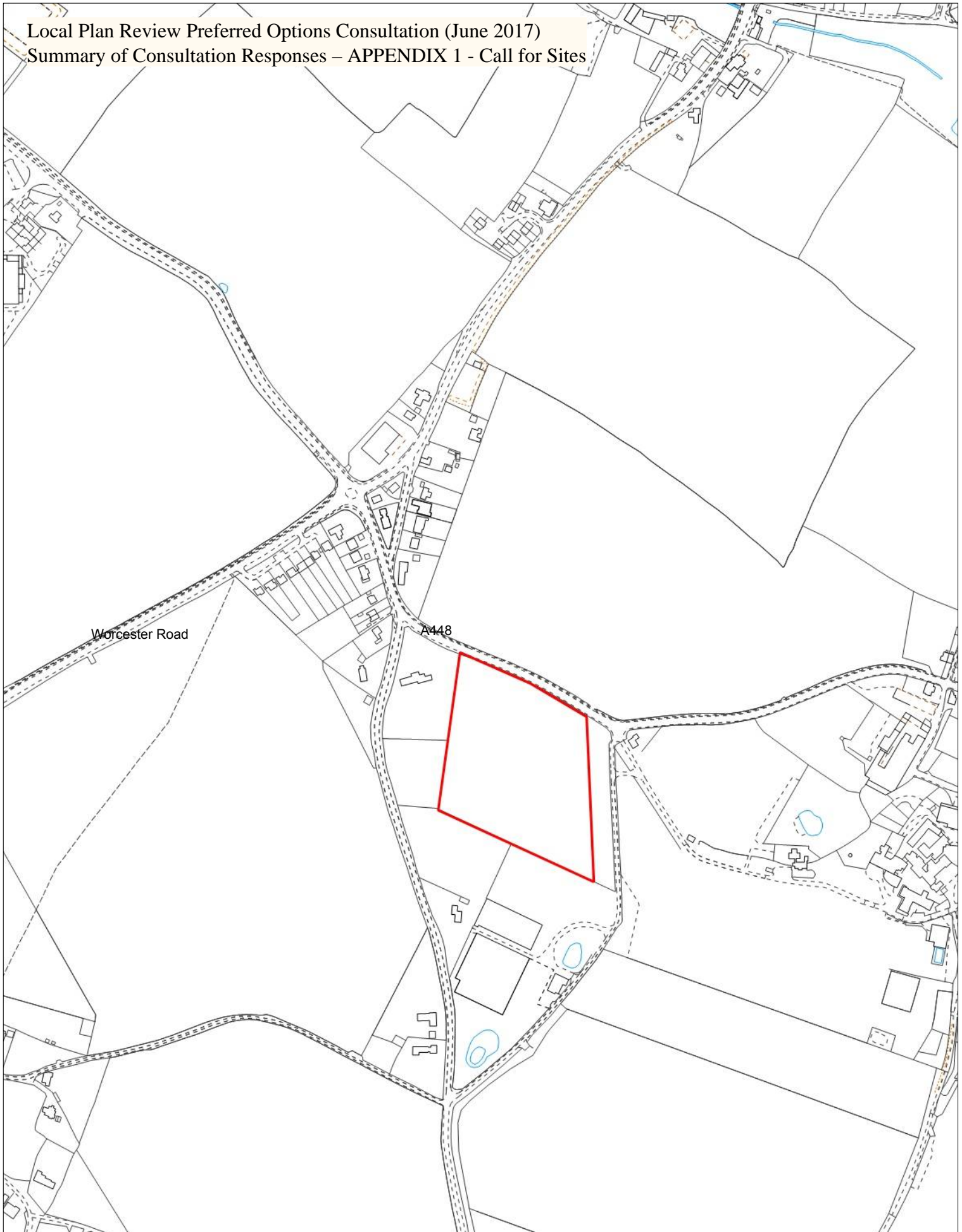
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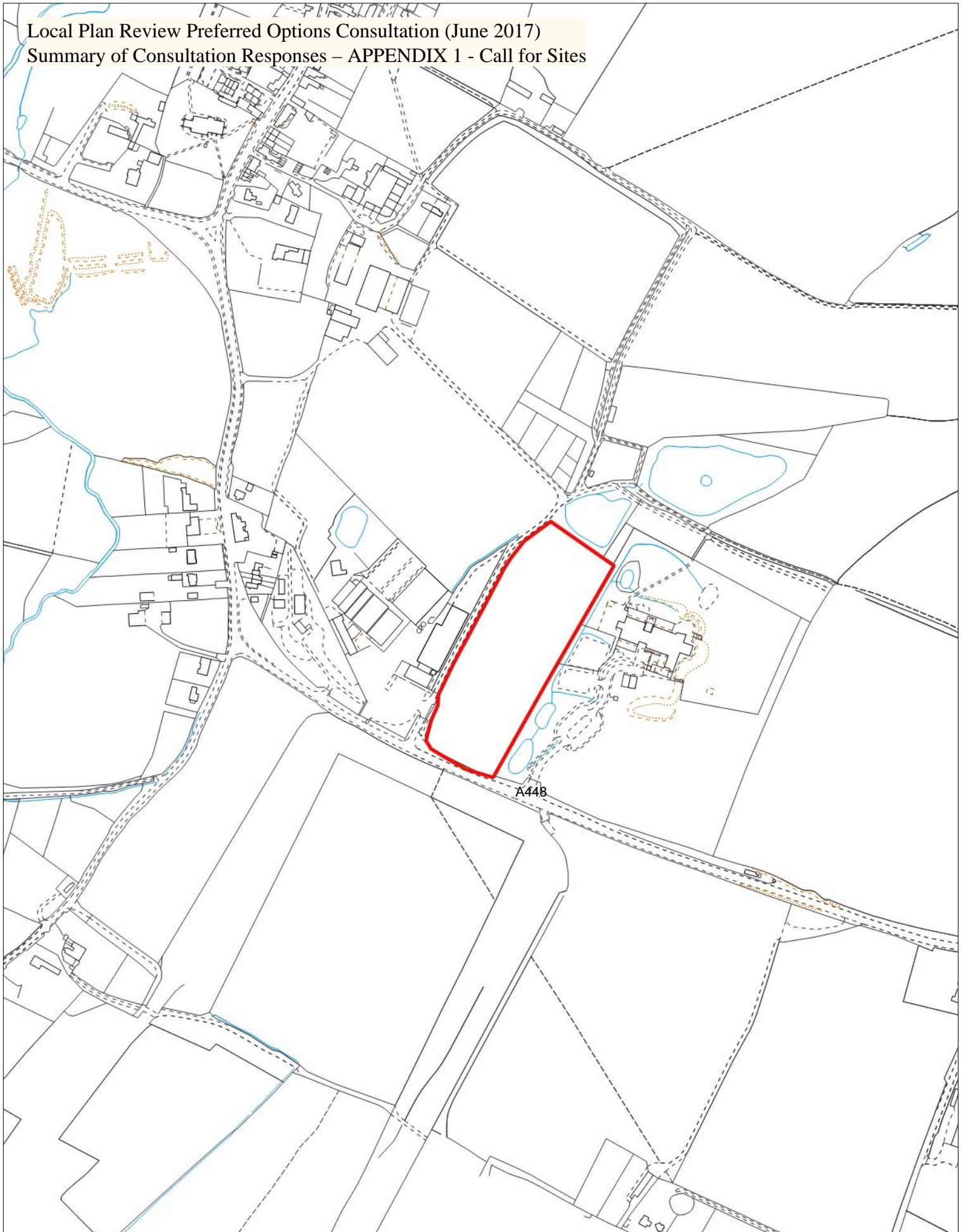


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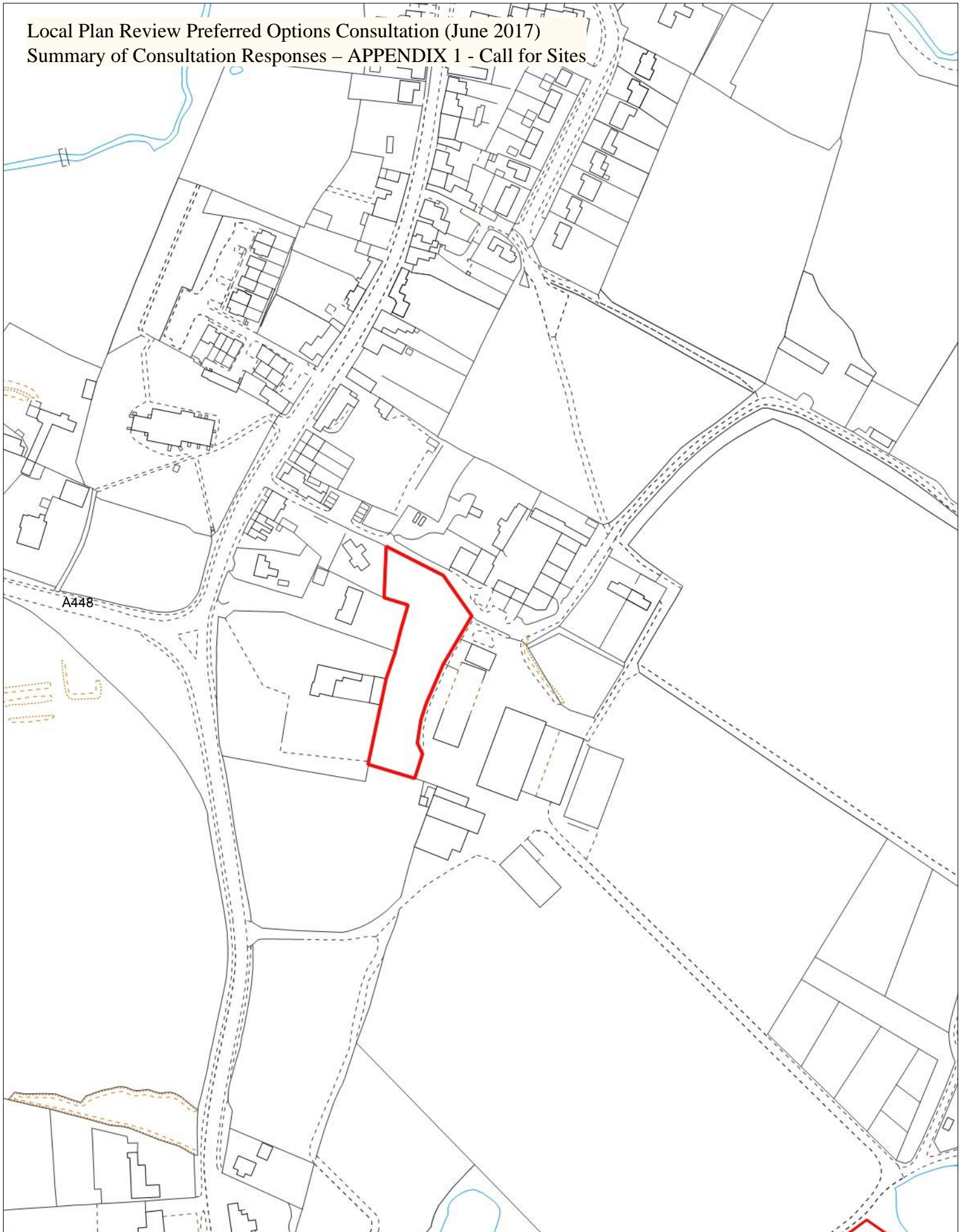
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Appendix 4 - Summary of Consultation Responses to the Local Plan Review  
Preferred Options (Reg 18) Consultation (June 2017)

APPENDIX 2 - RESPONSES AND OFFICER COMMENTS TO SECTIONS 1-28 OF THE PREFERRED OPTIONS DOCUMENT  
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Company / Organisation	ID	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
CORE11	<a href="#">LPPO136</a>	1.1	Support	Support for paragraph 1.1.	Support is noted.
CORE11	<a href="#">LPPO137</a>	1-2	Support	Support for paragraph 1.2.	Support is noted.
	<a href="#">LPPO4362</a>	1.3	Comment	Wyre Forest has no option but to find a new building plan to comply with the basically enforced Government legislation, however let us make the right decisions and plans now to resolve the run down areas of the town which can be addressed along with the new building schemes.	Comments noted.
Taylor Wimpey West Midlands	<a href="#">LPPO1548</a>	1.3	Comment	A plan period to at least 2034 is supported. This satisfies national guidance in the NPPF. A plan period of at least 15 years gives certainty to developers and provides clarity to local residents and employers.	Support is noted.
Persimmon Homes Limited	<a href="#">LPPO1420</a>	1.3	Object	<p>NPPF paragraph 157 states Local Plans should have a 15 year time period.</p> <p>The emerging Plan is for a period up to 2034. The plan will not be adopted until February 2019. There is, no leeway should the Plan be delayed at any stage.</p> <p>Factors which could affect the plan making process in Wyre Forest. At the present time the Council has suggested that Wyre Forest has a peripheral relationship to Birmingham City Council and therefore there is no current overriding requirement for the District to make provisions for the growth of the City. Birmingham has unmet housing need and the Black Country Authorities have a shortfall, number yet to be confirmed but likely in</p>	<p>These comments are noted. NPPF para 157 states that Local Plans should “<i>be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.</i>” The word used here is “preferably”. However, we will consider the possible benefits of increasing the Plan period as we continue our work with the Pre-Submission Plan.</p> <p>We are aware of the housing shortfall in the Black Country and Birmingham HMA areas. Duty to Cooperate meetings have</p>

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 1: INTRODUCTION AND CONTEXT**

Company / Organisation	ID	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>excess of 22,000 dwellings.</p> <p>This will fundamentally change the way in which the Birmingham figures need to be distributed. It will put pressure on the Local Authorities adjoining the Black Country area to accommodate additional growth. This could in turn result in Wyre Forest being required to accommodate housing to help meet the growth requirements of the conurbation generally. If this is the case, and further work needs to be undertaken to inform the emerging plan, the combination of these factors could result in a delay in the plan making process with the consequence that the timetable for the preparation of the emerging Wyre Forest’s Local Plan will slip. Even a relatively modest delay could result in the plan not having a 15 year time horizon from the date of adoption and, therefore, failing the requirements of the Framework.</p> <p>The plan period should be extended by 2 years. If the preparation of the plan progresses as hoped, extending the plan period will have no adverse impacts on the progression of the document. If, however, there are any delays this approach will ensure that the plan is Framework compliant.</p>	<p>and continue to be held with the Black Country and Birmingham Local Authorities.</p>
	<a href="#">LPPO3667</a>	1.3	Object	<p>1.3. states “<i>To consider the amount of development that will be required in response to the most recent official data (including population trends, demand for housing,</i></p>	<p>Objections noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The</p>

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 1: INTRODUCTION AND CONTEXT**

Company / Organisation	ID	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p><i>economic trends) and locally generated evidence”;</i></p> <ul style="list-style-type: none"> <li>• <u>Demand for housing</u>: where is this demand from? You have not shown sufficient evidence for this demand. There is a national demand for property in large cities but not in Wyre Forest due to lack of employment in the area, lack of quality schooling and infrastructure.</li> <li>• The requirement for 5,400 is shoehorned in to Kidderminster to create an artificial demand. It does not correlate with current demands, trends or growth prospects for the region.</li> <li>• The housing need outlined is incorrect                         <ul style="list-style-type: none"> <li>○ Wyre Forest growth in population has not grown as advised.</li> <li>○ The office of national statistics sub national population projections 2014 provides a projection for 2016 to 2034 of 4.65% 4629.</li> <li>○ The growth to 2015 has been 2.7%</li> <li>○ Therefore your growth projections are unsound.</li> <li>○ The required number of houses are not required</li> <li>○ A requirement of 200 per annum is more realistic 200 x 17 years. c 3000 houses</li> <li>○ The report assumes a vacant dwelling rate of 4.5%. As at 2015 it was 2.6% therefore the report is over estimating</li> </ul> </li> </ul>	<p>Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District.</p> <p>Since the Preferred Options consultation in 2017, the Government have released their new Standardised Methodology for calculating housing need in Local Authority areas. Therefore, a revised OAHN study has been commissioned and this will use the new standardised methodology to calculate the housing need for Wyre Forest District. In addition to this, an update to the Employment Land Review has also been requested. Both of these two evidence base studies will be used to inform the future growth options in terms of the site allocations for the emerging Local Plan.</p>



**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 1: INTRODUCTION AND CONTEXT**

Company / Organisation	ID	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>by c900</p> <ul style="list-style-type: none"> <li>The Growth for jobs forecast appears to be very optimistic and not based on current trends or evidence.</li> </ul>	
Gemini Properties	<a href="#">LPPO1189</a>	1.3	Object	<p>NPPF para.157 advises local plans should be drawn up over appropriate timescale - preferably 15 years to take into account long term development requirements. The emerging Plan goes up to 2034 with adoption currently timetabled for February 2019. This gives no leeway for delays. The Housing Distribution report for Birmingham's unmet housing need will not be available until later this year. The Black Country Authorities also are unable to meet their own need. This could potentially result in Wye Forest being required to accommodate housing need from the conurbation. This could well lead to further delays in the Plan which would mean it would not have a 15 year horizon after adoption. Suggest plan period is extended.</p>	<p>These comments are noted. NPPF para 157 states that Local Plans should “<i>be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.</i>” The word used here is “preferably”. However, we will consider the possible benefits of increasing the Plan period as we continue our work with the Pre-Submission Plan.</p> <p>We are aware of the housing shortfall in the Black Country and Birmingham HMA areas. Duty to Cooperate meetings have and continue to be held with the Black Country and Birmingham Local Authorities.</p>
Stourport High School	<a href="#">LPPO1200</a>	1.3	Object	<p>Timetable suggests that Plan will have a 15 year time horizon from date of adoption - minimum expected by NPPF. Timetable is very ambitious and does not allow for further slippage if growth requirements of conurbation have to be included. Timeframe should be extended by 2 years and thus also the housing requirement on a pro</p>	<p>These comments are noted. NPPF para 157 states that Local Plans should “<i>be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.</i>” The word used</p>

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Company / Organisation	ID	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>rata basis.</p> <p>Wyre Forest has a peripheral relationship to Birmingham City Council. Birmingham unmet housing need figures will not be made available until later this year. In addition, the Black Country Authorities shortfall is understood to be in excess of 22,000 dwellings.</p> <p>This could in turn result in Wyre Forest being required to accommodate housing to help meet the growth requirements of the conurbation generally. If this is the case, and further work needs to be undertaken to inform the emerging plan and the consideration of these factors results in any delay in the plan making process, the timetable for the preparation of the emerging Wyre Forest’s Local Plan will slip. Even a relatively modest delay could result in the plan not having a 15 year time horizon from the date of adoption and therefore, failing the requirements of the Framework.</p>	<p>here is “preferably”. However, we will consider the possible benefits of increasing the Plan period as we continue our work with the Pre-Submission Plan.</p> <p>We are aware of the housing shortfall in the Black Country and Birmingham HMA areas. Duty to Cooperate meetings have and continue to be held with the Black Country and Birmingham Local Authorities.</p>
Barratt Homes West Midlands	<a href="#">LPPO765</a>	1.3	Object	<p>Timetable suggests that Plan will have a 15 year time horizon from date of adoption - minimum expected by NPPF. Timetable is very ambitious and does not allow for further slippage if growth requirements of conurbation have to be included. Timeframe should be extended by 2 years and thus also the housing requirement on a pro rata basis.</p>	<p>These comments are noted. NPPF para 157 states that Local Plans should “<i>be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.</i>” The word used here is “preferably”. However, we will consider the possible benefits of increasing the Plan period as we continue our work with the Pre-</p>

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 1: INTRODUCTION AND CONTEXT**

Company / Organisation	ID	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
					Submission Plan.  We are aware of the housing shortfall in the Black Country and Birmingham HMA areas. Duty to Cooperate meetings have and continue to be held with the Black Country and Birmingham Local Authorities.
Barratt Homes West Midlands	<a href="#">LPPO812</a>	1.3	Object	NPPF para.157 advises local plans should be drawn up over appropriate timescale - preferably 15 years to take into account long term development requirements. The emerging Plan goes up to 2034 with adoption currently timetabled for February 2019. This gives no leeway for delays. The Housing Distribution report for Birmingham's unmet housing need will not be available until later this year. The Black Country Authorities also are unable to meet their own need. This could potentially result in Wye Forest being required to accommodate housing need from the conurbation. This could well lead to further delays in the Plan which would mean it would not have a 15 year horizon after adoption. Suggest plan period is extended.	These comments are noted. NPPF para 157 states that Local Plans should “ <i>be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date.</i> ” The word used here is “preferably”. However, we will consider the possible benefits of increasing the Plan period as we continue our work with the Pre-Submission Plan.  We are aware of the housing shortfall in the Black Country and Birmingham HMA areas. Duty to Cooperate meetings have and continue to be held with the Black Country and Birmingham Local Authorities.
CORE11	<a href="#">LPPO138</a>	1-3	Support	Support for paragraph 1.3.	Support is noted.
CORE11	<a href="#">LPPO139</a>	1-4	Comment	The strategic element and policies noted at 1-4 should	Comment is noted. The NPPF is the

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 1: INTRODUCTION AND CONTEXT**

Company / Organisation	ID	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				be read in conjunction with 1-12. & 1-14. This would clarify the legal requirements from the inspectorate. As the NPPF is not a statutory instrument. However the CORE STRATEGY is.	national planning policy, and therefore the emerging Local Plan must be in conformity with it.  Note that planning applications are assessed against the NPPF as well as the Development Plan for the area.  The Local Plan Review will be replacing the currently adopted Core Strategy. At Examination, the emerging Local Plan Review will be tested against the soundness test as set out in the NPPF para 182.
CORE11	<a href="#">LPPO140</a>	1-5	Support	Support for paragraph 1.5.	Support is noted.
CORE11	<a href="#">LPPO141</a>	1-6	Comment	After (e.g. roads, schools, utilities) Add, Open Spaces	Comment is noted.
CORE11	<a href="#">LPPO142</a>	1-7	Support	Support for paragraph 1.7.	Support is noted.
Wyre Forest Green Party	<a href="#">LPPO1495</a>	1.8	Comment	Planning must have strong community involvement. Unfortunately, this Local Plan Review has been conducted during summer holidays and many residents have claimed that they do not have adequate time to understand the documents and discuss it with their communities. As mentioned elsewhere The Draft Local Plan offers up a simplistic “Option A” and “B” to residents where many areas are in both (so-called “Core”).	The minimum requirement for a Local Plan consultation event is 6 weeks; the Preferred Options consultation ran for 8 weeks. This gave members of the public an extra 2 weeks than normal to respond. We will however take your comments on board and will consider these issues next time we undertake a consultation event.
	<a href="#">LPPO1570</a>	1.8	Comment	We are a small group who have come together with a	It is disappointing to read that you are

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Company / Organisation	ID	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>common goal, which is to raise awareness within Burlish and Lickhill Estates, about the proposals Wyre Forest District Council (WFDC) have recently released to build a significant number of houses on greenfield sites in the immediate area, these being:</p> <ul style="list-style-type: none"> <li>• The field at the top of immediately adjacent to the nature reserve (LI /2)</li> <li>• The field which runs parallel with <u>Burlish Crossing and Bewdley Road North (LI/5)</u></li> </ul> <p>The area currently occupied by a garden centre and horse paddocks on <u>Lickhill Road LI/6/7)</u></p> <p>We canvassed a number of our immediate neighbours to determine if they were aware of these proposals and it was clear they were not. Our primary aim was to gauge the extent of knowledge residents had about the plans and whether they were concerned sufficiently to wish to raise an objection or to comment formally to WFDC. We spoke to 197 people in these areas. Many residents were unaware of the consultation and nearly all canvassed expressed concern for the plans to build on Greenfield sites.</p> <p>It is clear the method of communicating the impact of the Local Review Plan falls far short of those expected by a local authority. The consultation period also took place during school holidays and factory shutdown, when many people would have been away from home and therefore not in a position to either see any information</p>	<p>not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14<sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. In particular, the two drop-in sessions held within Stourport were very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council’s website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>We therefore do not agree that the consultation period should have been extended as this consultation had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider</p>

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 1: INTRODUCTION AND CONTEXT**

Company / Organisation	ID	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				regarding the plans or comment upon them. We therefore formally request an extension of the consultation period to 30 September 2017, to allow wider communication and communication to local residents, to include communication with schools, GP surgeries, dentists. We would also urge the Council to further communicate with residents within the Wyre Forest district, perhaps by individual letters to homes including the plans with proposed housing numbers, and/or use of local newspapers such as the Kidderminster Shuttle and Express and Star. We look forward to receiving a positive response to our request.	these issues next time we undertake a consultation event.
	<a href="#">LPPO1583</a>	1.8	Comment	We were only notified of the proposed changes to the Local Plan when invited to attend a public meeting in June 2017, despite there being a published SA scoping report of May 2015 and the revised scoping report of September 2015. The failure to notify the residents of the proposed alterations to both Green Belt and loss of amenity of a proposed new northeast to south road does not show the Council in a good light. There is very little time for residents to prepare a response in the full detailed way we would have liked.	It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14 <sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. The drop-in sessions were all very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 1: INTRODUCTION AND CONTEXT**

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					<p>Council’s website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event was approved by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
	<a href="#">LPPO3955</a>	1.8	Comment	<p>We have never received any leaflets from either WFDC or the developers Barberry proposing to build on the Baldwin Road site. We were informed by residents in Greenhill. Other residents received the leaflet from Barberry developers and attended the Rose theatre meeting but were not aware about the Local Plan Review. This may account for the poor attendance. Commenting on the WFDC local plan is more important but I fear many people will not be aware of this because they did not receive the WFDC leaflet. Why is this?</p>	<p>The leaflet produced by Barberry developers was nothing to do with the Council.</p> <p>In terms of the Council’s Preferred Options consultation, leaflets were sent out to households within the District and advertising and press releases were issued throughout the consultation. There were also eight drop-in sessions.</p>
	<a href="#">LPPO3762</a>	1.8	Comment	<p>Having had an opportunity to view the Plan A and B options at the Stourport Civic Centre I would like to put forward the following comments.</p> <p>Firstly, I very much appreciate the authorities setting up an opportunity for local people to view and comment on</p>	<p>Thank you for your positive comments. We will also take on board the issues you have raised to help us improve our next consultation event.</p>

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 1: INTRODUCTION AND CONTEXT**

Company / Organisation	ID	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>the proposals. It was extremely useful to be able to view the diagrams of all the proposed sites – some of which I was previously aware of, and some I was not aware of.</p> <p>It is excellent that the local authority is looking to plan for the future rather than just react to the NOW situation. This would appear a very sensible way to prevent issues and prepare for coming generations.</p> <p>Overall the proposals do seem to be addressing key elements laid out in the full Preferred Options document.</p> <p>However, there are situations where remote people involved in putting together the reasoning for the plan will not be aware of all the specifics of individual locations.</p>	
	<a href="#">LPPO3390</a>	1.8	Comment	<p>I was concerned that at the consultation I attended the emphasis seemed very much biased towards Option A, with little said about Option B, or other alternatives. This cannot be right, particularly when coupled with the knowledge that, without the intervention of our excellent local independent councillor, the planners had no intention of holding a consultation on Spennells.</p>	<p>8 drop-in sessions were held throughout the District during the consultation event and all were very well attended. The drop-in sessions were also held at different times of the day including evenings and weekends to give people the opportunity to attend.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your</p>



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					<p>comments on board and will consider these issues next time we undertake a consultation event.</p>
	<p><a href="#">LPPO2816</a></p>	<p>1.8</p>	<p>Comment</p>	<p>The map within the consultation document is incorrect and misleading, it shows land that we know is being looked at for affordable housing.</p> <p>Some residents living on the MHDC side of Clows Top did not receive any information on this matter from WFDC. We and another resident of Clows Top did our own flyers to alert residents to the full details of the consultation for Clows Top. We feel Rock PC should have been looking to inform the village of this issue, it was not sufficient to put it on their PC agenda on the notice board.</p>	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14<sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council’s website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and</p>

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 1: INTRODUCTION AND CONTEXT**

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					<p>Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p> <p>We will ensure that the base maps used in the emerging Local Plan are the most up-to-date versions available to us.</p>
Summerfield Against Land Transformation	<a href="#">LPPO1610</a>	1.8	Comment	<p>We are concerned about:</p> <ul style="list-style-type: none"> <li>• the timing and limitations of the consultation</li> <li>• the influence of developers, land owners and their agents upon the plan.</li> </ul> <p>The overall length of the planning <u>process</u> is problematic. Many members of the public lose track of, or fail to appreciate the significance of, key stages of the process. There is an overreliance on the ‘evidence’ to emerge from earlier consultation, much of which came from landowners and developers. Much more should have been done to consult earlier on key elements such as the Green Belt Review. The Council needs to do much more to inform, engage with and stimulate an <i>active</i> discussion — <u>at each stage</u> - of such far reaching proposals. Consultations should not be undertaken during the peak holiday period as this disadvantages the public.</p>	<p>The minimum requirement for a Local Plan consultation event is 6 weeks; however, the Preferred Options consultation ran for 8 weeks to take account of the school holidays. This gave members of the public an extra 2 weeks than normal to respond. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p> <p>The Green Belt study was undertaken by consultants who have extensive</p>

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					<p>experience of producing these types of studies. Using consultants also meant that it was an ‘independent study’ and less open to criticism than if the Council had undertaken the study themselves.</p> <p>Pre-application discussions are confidential discussion that a developer or landowner can request from the Development Management Planning team. It is up to the developer if they want to request pre-application advice before submitting a planning application to the Local Authority.</p>
	<a href="#">LPPO4878</a>	1.8	Comment	<p>At the consultation event I attended there was nothing in detail, it was a struggle to actually get to the tables, and I felt, maybe erroneously, that there was an element of hoodwinking going on. Is there a road to build, if so where and why? Is one example of questions asked and not coherently answered. The timing of this consultation is inappropriate. Schools are now closed, the holiday season is upon us, and there is very limited time for residents to properly digest the full implications of this plan and respond thoughtfully. I feel distressed, rushed, and that matters which affect the town are being pushed through. I sincerely hope that our elected members listen to what is being said, that the plans and future consultations are open, honest, and based on fact.</p>	Comments noted.

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	<a href="#">LPPO5064</a>	1.8	Comment	<p>Having attended the local 'drop in session' at Heronswood School I was appalled by the lack of information on the effect your plans would have on the infrastructure of the area; mainly on the new road proposals which would have a dramatic effect on the environment, with increased traffic, traffic noise and higher emissions of exhaust fumes with resulting increased risk to health.</p> <p>Your officers were unable or did not wish to explain in any detail what your plans were to cope with the effect of building new homes and where the resulting traffic would enter and exit the planned development.</p> <p>As a local resident how do you expect me to make a constructive judgement on your proposed plans if I am denied vital information at the public consultation?</p> <p>I believe you have failed to meet the guidelines detailed in the YOU GOV. framework of consultation procedures and also the Rural and Planning Institute recommendations; and believe you should suspend this consultation until such time that you are prepared to be transparent with your information.</p> <p>Failure to supply adequate information would leave you open to investigation by the Local Government Ombudsman.</p>	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14<sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a</p>

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					consultation event.  We will ensure that the base maps used in the emerging Local Plan are the most up-to-date versions available to us.
	<a href="#">LPPO5069</a>	1.8	Comment	I attended the drop-in centre at Stourport Civic a couple of weekends ago and found it a complete waste of time - any questions that I asked while I was there were answered by flicking through the Plan document itself which, to be honest, I could have just done myself and this gave me no more information than what I had read prior to coming to the drop-in.	Comments noted.
	<a href="#">LPPO5070</a>	1.8	Comment	My original objection, sent to LPR by e-mail on 13 <sup>th</sup> July, "Local Plan Review, Option B", was initially based on the following early information through my front door. (In no order of delivery significance to me.) <ul style="list-style-type: none"> <li>• <b><u>Aggborough &amp; Spennells Independence Team</u></b> (4no. A4 papers)</li> <li>• <b><u>Spennells Conservative Party</u></b> (1no. A4 paper.)</li> <li>• <b><u>WFDC – Local Plan Review</u></b> (1no. B5 paper.) Directing to libraries, hub – presumably for hard-copy of plans and proposal's, (that should have been mail-shot, at least to the Spennells populace.) Then all other information to a digital source for the same drawings and other written word. (Again another presumption that there is access for the</li> </ul>	Comments noted.

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				<p>majority to the digital source.)</p> <ul style="list-style-type: none"> <li>• <b><u>Spennells Pensioner</u></b> – “Spennells Green Belt is at Risk.”</li> <li>• <b><u>Spennells Pensioner</u></b> – “Spennells Against Further Expansion.”</li> </ul> <p>All of these five sources of perceived relative information seem to trip over each other in one aspect or another depending on which side of the argument one is tending to favour.</p> <p>Since my objection was submitted, other lengthy papers have been introduced – again with contradictions by way of interpretation. Plus an awful lot of apparent supposition, if developers have been named – Cox and Persimmon, then one can guess that a lot more developers have shown an interest, and deals have been ‘Done – subject to approval’.</p> <p>I think it should be reiterated that from the very beginning of this Planning Review, that the time scale is based on proposals and public consultation for a couple of years and then a projected time lapse of fifteen years to execute the plans. Then remember that Wyre Forest is not the biggest conurbation in the country and that its aspirations should reflect that of a relatively small rural district of three quite independent towns.</p>	
	<a href="#">LPPO4793</a>	1.8	Comment	Comments on the consultation process.	Comments noted.

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				<ol style="list-style-type: none"> <li>1. The AS flyer distributed by post was delivered with junk mail</li> <li>2. Document is difficult to navigate</li> <li>3. One paper copy in each library is not inadequate</li> <li>4. The drop-in session in Bewdley was very crowded, more and longer sessions would have helped.</li> </ol>	
	<a href="#">LPPO276</a>	1.8	Comment	<ul style="list-style-type: none"> <li>• Preferred Options should be left till after October 30th 2017.</li> <li>• The reason being Gladman developments appeal will be decided by then.</li> <li>• If they win there appeal for nearly 200 houses there will be no need to take land from the Green Belt.</li> <li>• With there success rate at these appeals we should wait till after the appeal decision.</li> </ul>	<p>The Gladman Appeal Public Inquiry was held during October 2017; however the Planning Inspector who conducted the Inquiry did not publish his decision until March 2018. The appeal was dismissed.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan in place. Therefore, we have to progress with our emerging Local Plan, but in this case the outcome of the Public Inquiry has been considered.</p>
	<a href="#">LPPO2106</a>	1.8	Comment	<p>I am sceptical about the process as I only found out about plans to build on the Green Belt via a sign by Persimmon’s telling me not to enter the fields because it was now private property owned by them. Only after questioning social media did I find out about the consultation (to be held in the Summer holidays!). It made me feel like this was being kept quiet! Why didn’t I know about it and how many others haven’t known about it until quite late on in the process?</p>	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14<sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to</p>

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					<p>come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
	<a href="#">LPPO3004</a>	1.8	Comment	In my opinion, WFDC did not provide residents with enough information. Many residents will either not have seen, or realised the importance of the small, 'flyer' style leaflet. Many residents are still not aware of the 'Local Plan' and how it might affect them. More detailed information, along with a comments form, ought to have	It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14 <sup>th</sup> August at 5pm.



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				<p>been sent to residents. This would have given everyone a fair chance to comment, including those unable to attend meetings, and those without internet access etc.</p>	<p>During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
	<a href="#">LPPO5077</a>	1.8	Comment	<p>Having attended the <i>planning review</i> debacle at Heronswood School yesterday afternoon, I would like to give my conclusion regarding this presentation.</p> <p>On entering the room there was an emphasis as to</p>	Comments noted.

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				<p>demonstrate the positives of living in Wyre Forest, especially Kidderminster.</p> <p>I've only lived in Kidderminster a short period of time, and it doesn't take a great deal of imagination to realise Kidderminster is a deprived, run down under invested town, with basically nothing going for it other than beautiful local country side, which you now intend to decimate and to encourage more people to come and live here.</p> <p>Your colleagues from the Planning Office were asked numerous question regarding the proposed plans and the options being put forward, the general consensus was "they were unable to answer many of the question asked, people found this very frustrating and annoying as <b>YOU</b> the council will be making decisions which will have an enormous impact on all of us living within this proposed development area.</p>	
	<a href="#">LPPO273</a>	Local plan review housing development options	Object	<p>I would like to comment / object regarding P194 the proposed development of Lea Castle.</p> <p>I object to Options A &amp; B on the grounds that there is a lack of local infrastructure to support this. In terms of schools, doctors' surgery, shops and transport Cookley is already at capacity. The access and highways infrastructure would also not cope with the additional traffic and some additional visibility splays and traffic</p>	Objection and comments noted.

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				<p>lights will not do anything to help this.</p> <p>600+ houses in the Lea Castle area would need an additional School and Dr's surgery. Cookley Sebright is full and has no room for expansion. It has no usable playing field, to expect it to take more children is ludicrous. Additionally the Dr's surgery is so busy it is hard to get appointments. The nearest High School is the smallest in the district - how will these schools cope with the proposed additional demand these options suggest??</p> <p>I would like to object to Option A in that it would effectively link Cookley to Kidderminster making it an extension of Kidderminster. In the local plan Cookley is referred to as an extension of Kidderminster, it is not, it is a village. As a separate village it should be allowed to expand in line with its own needs. In being asked to accommodate 600+ houses it is expanding to Kidderminster's needs and being expected to carry this burden on its already stretched infrastructure.</p> <p>While I agree that a development of the Lea Castle site is needed this needs to be done more sensitively with a view to supporting local infrastructure and need. The current plans do not do this.</p> <p>Local action groups are recommending development of Lea Castle but Cookley is a village. It is not an extension of Kidderminster and it should not be sacrificed to</p>	

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				<p>support Kidderminster's needs.</p> <p>As per the NPPF as outlined in the proposal, Green Belts serve various purposes such as checking the unrestricted sprawl of large built up areas, preventing the neighbouring towns merging into one another, assisting in safeguarding the countryside from encroachment and preserving the setting and special character of historic towns. I cannot see how either Option A or B will do anything other than go against these purposes listed.</p>	
	<a href="#">LPPO128</a>	1.8	Object	<p>Maps were either distributed previously at the consultation, or not supplied.</p> <p>The plastic display boards were badly designed as the maps were all below waist height so had to squat down to see them, I am an OAP and the development officer asked me to stand as he was struggling – poorly thought out.</p>	<p>We will take these comments about the conduct of the consultation on board and will consider these issues next time we undertake a consultation event.</p> <p>Note that chairs were available at nearly all of the drop-in sessions we held (except for 1 drop-in session).</p>
	<a href="#">LPPO611</a>	1.8	Object	<p>Your consultation website does not support https protocol</p> <p>For a local government website to not protect users data by encrypting traffic in 2017 is woefully inadequate</p>	<p>The online consultation website was an externally hosted site. We have informed them of this issue and future consultations will use the https (secure protocol).</p> <p>In terms of the Councils website, the Council is looking into the use of https for its main website.</p>
	<a href="#">LPPO3936</a>	1.8	Object	The plan and accompanying documentation does not	It is disappointing to read that you are

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				<p>provide residents with a balanced view. This is supported by the fact that initially no 'drop in' session was planned for the Spennells area, an area which would feel the greatest impact if Option A were secured.</p> <p>With regard to the process of the WFDC consultation, I feel that it has been:</p> <ul style="list-style-type: none"> <li>• <u>Untimely</u> (School holidays would possibly mitigate against full participation. A September start date would have been preferable.)</li> <li>• <u>Limited</u> ('Drop ins' where planners clearly favouring one option, therefore a distinct lack of impartiality. Literature which provided a broad brushstroke of the Local Plan, again emphasising the value of the infrastructure package, despite no detail regarding the proposed Eastern Relief road)</li> <li>• <u>Filtered</u> (It would appear that accessibility to information to guide residents' thinking was comparable to a post code lottery. Many communities around the district, even now, pleading for more time to consider the issues, as feeling not fully informed)</li> <li>• <u>Unequal</u> (Areas of Wyre Forest excluded from the Draft Local Plan, e.g. Blakedown, Churchill, Wolverley. Individual District Councillors, have, as a result of their particular roles and responsibilities, attended Parish Council Meetings. I assume there is agreed Council protocol/code of practice, regarding how Parish Councils are updated on District Council matters, in order to ensure equality of access to information)</li> <li>• <u>Discriminatory</u> (The Wyre Forest Draft Local Plan and</li> </ul>	<p>not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14<sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet.</p> <p>We will however take your comments on</p>

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				<p>Objective Assessment of Housing Need Report has been available online. Hard copies of these documents have been available in the library. No consideration has been given to maybe elderly residents who are either not conversant or familiar with accessing information online, and may face difficulties in visiting the library. The entire Draft Local Plan is 206 pages and OAHN is 176 pages. Could not summaries been made available? The Council also seem to have overlooked residents with disabilities, in particular those residents with a visual impairment. There is a charity, Wyre Forest Talking Newspaper, which could possibly have helped.)</p> <p>Wyre Forest District Council, as a body, have not offered a presentation of the Draft Local Plan, hosted possibly at Kidderminster Town Hall, or to secure further improved engagement, in local High Schools, across the District, namely Stourport, Bewdley, Wolverley. This would have provided for' face to face' questions to be raised by the electorate.</p> <p>To summarise, I believe the consultation process has been inadequate.</p>	<p>board and will consider these issues next time we undertake a consultation event.</p>
	<p><a href="#">LPPO3385</a></p>	<p>Option A</p>	<p>Object</p>	<ul style="list-style-type: none"> <li>• The draft plan consultation period began at peak holiday time and coincided with the approval of the Blakedown Neighbourhood Plan.</li> <li>• Blakedown and Wolverley should be included in developments.</li> </ul>	<p>The minimum requirement for a Local Plan consultation event is 6 weeks; the Preferred Options consultation ran for 8 weeks. This gave members of the public an extra 2 weeks than normal to respond. We will however take your</p>

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					<p>comments on board and will consider these issues next time we undertake a consultation event.</p> <p>Comments on Blakedown and Wolverley are noted.</p>
	<a href="#">LPPO2748</a>	1.8	Object	<p>Consultation evening held at Heronswood Primary School on Monday July 10th. Different answers to the same questions were given depending on who one spoke to, whether a local councillor or someone from the planning office. I was told “It is not 1700 houses <u>only</u> 900”, as if 900 houses is a small number.</p> <p>At the beginning of the local plan it states: “Virtually static population growth”.</p> <p>So why does the Wyre Forest need these houses?</p> <p>The timing of this consultation could not be worse. School holidays are personal holidays taking place. One might think that this was deliberate on the part of Wyre Forest District Council in order that residents would not have the time to take notice of the proposed plans and or to object and protest against the plan.</p>	<p>The minimum requirement for a Local Plan consultation event is 6 weeks; however, the Preferred Options consultation ran for 8 weeks to take account of the school holidays. This gave members of the public an extra 2 weeks than normal to respond. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p> <p>The local authority has a statutory duty to produce a Local Plan. The Local Plan looks at the future growth over the next 20 years. The population continues to expand due to births, migration, and an aging population that continue to stay in their own home. This all puts pressure on the housing need for the area. The Local Plan has to cater for this housing need and plan for the future growth. There are a number of evidence base studies that have and continue to inform</p>

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					the emerging Local Plan, including the Objectively Assessed Housing Needs (OAHN) study.
	<a href="#">LPPO2972</a>	1.8	Object	The consultation process is flawed. The people are not being asked what they want, they are being given two options only, neither of which are acceptable. I have not heard of any surveys being done to find out what people want. People had to demand more drop-in sessions. There is no real plan. A new eastern bypass <u>may</u> be built by the County Council? There <u>may</u> be a new school if one of the developers builds more than 1,000 homes in one place? Health provision is overlooked? Planning officials at the drop-in session seem not to know the local area.	Objection and comments noted.
	<a href="#">LPPO2240</a>	1.8	Object	Objects to the process and the unfairness of expecting the general public to arrive at a conclusion and wants WFDC to <ul style="list-style-type: none"> <li>• Suspend “Drop in Sessions”</li> <li>• Revisit the LPDR</li> <li>• Provide more comprehensive mapping</li> </ul>	Objection and comments noted.
	<a href="#">LPPO4473</a>	1.8	Object	Lack of information. We only found out about it when a neighbour told us on Sunday 7th August and the consultation was held when people were away on holiday. The entire process should be restarted in the autumn with better communication from the council.	It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14 <sup>th</sup> August at 5pm.



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					<p>During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council’s website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
	<a href="#">LPPO4475</a>	1.8	Object	I was shocked that the Council provided no official notification to our home about the proposed large scale development in Stourport. I only found out about the	It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options

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				<p>matter when a kindly neighbour places a note through our door in the last few days.</p>	<p>consultation was conducted. There was a full 8 week public consultation which closed on Monday 14<sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council’s website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>

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	<a href="#">LPPO4489</a>	1.8	Object	<ul style="list-style-type: none"> <li>• Spennells drop-in session was disorganised and chaotic and we were ill-informed about</li> <li>• Neighbourhood plans with councillors have a lot of involvement with are crucial to deliver the local plan - councillors main aim is to ring-fence their areas from the plan - 'Nimbyism' or what?</li> <li>• Some parishes have been working on their neighbourhood plan for years having many chances to re-submit it and having it adopted by WFDC before the consultation period had ended - down to inside information and not good fortune.</li> <li>• Kidderminster has no neighbourhood plan - counsellors should have made Kidderminster Town Council pursue this.</li> <li>• Little information on the eastern link road at the drop-in sessions despite being integral in plans.</li> <li>• Hard to discover support/advice to different areas in Wyre Forest - fears that areas are treated differently due to councillors input from their many different roles.</li> </ul>	<p>The Spennells drop-in session was the first drop-in session the Council held during the consultation event and there was a very good turnout of people. We learnt from this first drop-in session and improved the other sessions by providing more Officers, improving the displays and providing sign-posting to direct people into the event.</p> <p>Neighbourhood Plans are not prepared by the Council but we do have a duty to cooperate with any Parish or town Council that wishes to prepare a Neighbourhood Plan. The decision on whether to prepare a Neighbourhood Plan is up to the Parish or Town Council.</p>
	<a href="#">LPPO4592</a>	1.8	Object	It is not in accordance with the guidelines for Public Consultation and falls short of both YouGov and Rural and Town Planning Institute best practice and needs to be revisited.	Disagree. The consultation ran for 8 weeks, which is two weeks extra than the minimum requirement. The documents were made publically available throughout the whole of the consultation period, both online and in hard copy form at public venues. There

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					were 8 drop-in sessions with Officers attending to answer questions and display information.
	<a href="#">LPPO4630</a>	1.8	Object	Timing of the local drop-in sessions during the beginning of the school holidays and "factory fortnight", which is perhaps the busiest time of year, when many people are away on holiday, is frankly disgusting! I appreciate that details could be found on your own website but without a reason to go there, without that initial knowledge, why would anyone look?	It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14 <sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on the TV news.
	<a href="#">LPPO4633</a>	1.8	Object	I must raise my concern about the lack of publicity regarding the plan. Until Thursday evening I was	It is disappointing to read that you are not entirely satisfied with how the Local

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				<p>blissfully unaware of the revised plan and impending planning meeting.</p> <p>I am currently on holiday and trying to read a 200 documentary page document on a mobile phone is not ideal.</p>	<p>Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14<sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p>
	<a href="#">LPPO4689</a>	1.8	Object	<p>The consultation process was terrible, Spennells School was filled with residents with only two planning people to speak with. Most of us didn't get a chance to ask any questions to clarify plans or put our views across. The area to be developed was tiny to view on the maps. No plans were given as to where roads would be created. The deadline for views to be given in is over the school</p>	<p>Disagree that there were only two planning officers present at the Spennells event – there were in fact several officers from the planning team present at this event to answer questions but the number of residents attending was greater than what we had</p>

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				holidays and in August when most people are away on holiday. It all gives the impression that planning options have already been decided and the public's views and residents of Spennells views are unimportant to the process.	anticipated. However, as it was our first drop-in session we did learn from this experience and provided more officers at the next drop-in sessions which ran a lot smoother.
	<a href="#">LPPO4748</a>	1.8	Object	I do not feel the consultation process to be fair, inclusive or within the spirit of the NPPF. I have had to actively seek access to all documents that have helped shape my opinion – even requesting that documents were correctly, chronologically ordered on WFDC portal. The language and terminology used can be at best described as ambiguous. This would have negated many residents being able to fully comprehend the magnitude of the proposed options.	The Preferred Option Plan and the supporting evidence base documents were made available on the Council's website for public viewing throughout the whole of the consultation period, and remain on there now. The documents were also available at the eight drop-in sessions held throughout the District during the consultation event. Hard copies of the Preferred Options Plan were also available at the Council Hub and local libraries in the District.
	<a href="#">LPPO4772</a>	1.8	Object	This consultation has not been forthcoming with any detailed information. No clear information, detailed road plans and answers to questions raised by the local population have been forthcoming.  With ref to the roadshow at Heronswood School no representative was available from the Highways to discuss the proposed road, the layout and effect on the local population. The local planning officers did not know or was unwilling to pass on any information, the only reply was "it's only a draft plan at the present time"	As the Preferred Options was only the second stage of plan-making, not all the information was available as further evidence base studies needed to be undertaken, such as the Transport Modelling. The next stage of plan-making which is known as the Pre-Submission stage will provide further detail. The Transport Modelling work will also be available at this next stage.

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				well we need to know.	
	<a href="#">LPPO2693</a>	1.8	Object	<p>Flawed Nature of the Consultation</p> <p>a. When the Consultation commenced, there was no intention to hold a drop-in session for Spennells. Even though potentially most affected group. This omission cannot be accidental.</p> <p>b. Consultation deliberately timed to include the end of July and half of August. Can only be assumed to be timed to reduce the opportunity for those who will be affected to scrutinise the plans.</p> <p>c. The Draft Local Plan and the OAHN are extremely complicated and not designed to allow ordinary people to understand them and have a fair opportunity to agree or disagree. The figures in them are mixed and different figures for the same item appear in different places. The figures that I have chosen to use seem fair but I could have chosen others from within the documents.</p> <p>d. The Consultation is very much aimed at getting a response from the question – ‘Do you want plan A or plan B?’. This is a totally flawed approach attempting to bludgeon people to accept what they consider to be the least worst option. The third option of rejecting the entire plan should have been made crystal clear.</p> <p>e. At drop-in session, officials were loath to discuss the relief road. They insisted that a plan does not exist. The Chair of Planning then added that we had no right to see the road plan as it wasn’t part of this Consultation. This is an utterly incorrect approach. It is impossible for citizens to give their backing to the destruction of the</p>	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14<sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. In particular, the drop-in session held at Spennells was very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council’s website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your</p>

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				Green Belt without full understanding of the consequences. To defer this discussion until after the land has been taken out of the Green Belt is totally wrong. Overall this has been a totally biased and unfair consultation. The current Draft Local Plan should be rejected in its entirety.	comments on board and will consider these issues next time we undertake a consultation event.
	<a href="#">LPPO2887</a>	1.8	Object	<p>There has not been sufficient consultation for such a far reaching plan. Timescales insufficient to enable residents to consider the implications, or comment.</p> <p>Consultation portal difficult. Paper consultation form off-putting especially identifying paragraph. Timing of the consultation period being in peak holiday period with meetings being held in 'office hours' when people are at work. Process should be high profile, easily accessible for all residents and totally transparent. This process has failed and the consultation process should be extended. Loss of our Green Belt is a major issue for all residents of Wyre Forest and as a result should be treated as a special case with an extended consultation period.</p>	It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14 <sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended and were held at different times of the day, including evenings and weekends. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express & Star, and it was also on local radio stations and on



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					<p>the TV news.</p> <p>In terms of responding to the consultation, there were several methods of submitting responses to us, but the online digital approach is always encouraged as it saves officer time in dealing with the consultation responses and is also more environmentally friendly as it saves paper.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
	<a href="#">LPPO5004</a>	1.8	Object	<p>We only found out about the proposals on 23<sup>rd</sup> July 2017. This was from a note drop by Councillor David Little encouraging us to attend a drop in consultation on 29<sup>th</sup> July. If it wasn't for him, we would have no idea about the plans.</p> <p>We notified residents the field side of Burlish Crossing, all residents on Bewdley side of the lights and all the houses that back onto the fields. We informed them of the proposals and encouraged them to go to the consultations and gave them the dates. Everyone we</p>	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14<sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well</p>

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				<p>spoke to said that they had not received any notification about the proposals, although some had received the note drop from Councillor David Little. I'm very disappointed about the lack of consultation time given and that all dates in the consultation period fell into the first 2 weeks of the summer holidays, when many residents are away and half of the dates had already passed by the time residents were informed, preventing them from engaging in the process.</p>	<p>attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
	<a href="#">LPPO5079</a>	1.8	Object	<p>I feel that the whole process of this 'consultation' has been designed to confuse the local population. I have 2 adult daughters living in Kidderminster, neither of whom had the original green leaflet delivered to their homes. They would not have known about any of this had I not told them. The consultation period has been planned for a time when many people are on holiday. The meetings have been arranged for times not suitable for all to attend, and at small sites. The meeting I attended was packed meaning I could not see the information clearly</p>	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14<sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the</p>

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				<p>or speak to staff. The staff I heard speaking to others seemed to know very little and were unable to answer questions posed. The process has been designed to pit residents against each other by choosing Option A or B. There was no mention in the wording of objecting to both options. Why were residents not consulted about the so called Core areas which appear on both plan options?</p>	<p>drop-in sessions were very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council’s website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p> <p>With regards to the ‘Core Sites’ they were consulted on during the Preferred Options. The ‘Core Sites’ were common to both Option A and Option B – however comments could still be made on the ‘Core Sites’.</p>
	<a href="#">LPPO4333</a>	1.8	Object	<p>You have made it very difficult to comment. The web pages are not user friendly, neither is this form. The idea</p>	<p>There were several ways in which people could comment on the Plan. The number</p>

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				that my comments should relate to a particular page number of a 195 page document beggars belief; I have however been to a consultation meeting, talked with officers and perused the documentation.	of responses we have received proves that this has been successful.
	<a href="#">LPPO4745</a>	1.8	Object	Having spoken at the drop in session with planning officers I felt that they preferred Option A as it is the cheapest and I felt that we were not getting a fair and open choice. They were unable to answer specific questions, felt the road would not be used by trucks or as a cut through, both of which are a given, in order to avoid the Black Bridge and most staggeringly nobody from the Highways was available to discuss these issues. It was also sounding as if the Council had decided but were following protocol in order to say they had listened to the residents and concerned parties, although it had been noted that until the Local Councillor spoke up Spennells were not deemed important enough to even be given a drop in session to see the proposals. This again looks as if a deal has been struck and we have no say. I may like to point out that the Council are elected by the people and can easily be unelected, especially after hearing some of the County Councillors remarks. I also feel that we have not been given all the relevant facts and details which points to a flawed consultation.	The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.
	<a href="#">LPPO4873</a>	1.8	Object	I think I speak for many when I say that these proposals have come as quite a shock to the local residents, there has been talk of the Council informing us with a leaflet or a mention in the local paper. This appears to have gone unnoticed by the majority of locals, and it seems	It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which

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				<p>we now have an unreasonable consultation period in which to voice our concerns and consider in a balanced measure “the people's “objections. It is unfair to pursue a campaign in which we lose our beautiful countryside through ignorance, whilst others stand and keep their ground having been better informed. It appears we now have an inordinately small and derisory period of time to rally and consider our rights as landowners and citizens of this district to express our thought and beliefs on this matter.</p> <p>Hence I would like to add my strong objections to the deadline you imposed on us for this building project which appears to be a most ill conceived set of plans.</p>	<p>closed on Monday 14<sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. All of the drop-in sessions were very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council’s website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event had been agreed by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>
CORE11	<a href="#">LPPO144</a>	1-8	Support	Support for paragraph 1.8.	Support is noted.
	<a href="#">LPPO5005</a>	1.8	Support	Firstly, thank you for taking the time and trouble to put	Support and comments noted.

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				the presentation together on 26th July at Areley Kings Village Hall. It was very informative and a great way to get lots of detailed information to the public.	
	<a href="#">LPPO3715</a>	1.11	Object	The level of development is entirely dependent upon the OAHN which uses subjective assumptions to derive the recommendations. The document has no clear line of sight from its source data to its final conclusions bringing in figures at table G1 without justification.	Since the Preferred Options consultation, the Government has introduced a Standardised Methodology. The OAHN study is therefore being revised to use this new standardised methodology.
Education & Skills Funding Agency	<a href="#">LPPO1050</a>	1.12	Comment	ESFA encourages close working with LPAs during all stages of planning policy development.	Comments are noted.
	<a href="#">LPPO3716</a>	1.12	Object	There is no methodology to demonstrate the process by which the Council will actively consider the comments from the Consultation at all. There is lack of democracy and the process is flawed.	The Statement of Community Involvement (SCI) sets out how the Council intends to engage with local residents during consultations on Development Plan documents. The SCI is available on the Council's website for public viewing.
CORE11	<a href="#">LPPO145</a>	1-13	Comment	The legally compliant and soundly based should refer to the statutory CORE STRATEGY as the NPPF is not a statutory instrument.	Disagree. The Local Plan Review will be replacing the currently adopted Core Strategy. At Examination, the emerging Local Plan Review will be tested against the soundness test as set out in the NPPF para 182.
Land Research & Planning	<a href="#">LPPO538</a>	1.14	Comment	Land should be designated for housing development adjacent to or on the outskirts of smaller	As part of the Local Plan Review process we are considering affordable housing

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Associates Ltd				<p>settlements should the landowner offer at least 50% affordable homes and/or starter homes.</p> <p>WFDC is no different to the majority of other Local Planning Authorities in that the provision of affordable homes is falling further and further behind when Government is encouraging and supporting them</p>	and there will be policies in the Local Plan which stipulate the affordable housing requirement expected from sites. This will be based on evidence, which includes the revised OAHN study and the Viability Assessment.
	<a href="#">LPPO305</a>	1.14	Comment	<p>I am fully supportive of this consultation document.</p> <p>I must stress that as well as larger housing and infrastructure requirements, it is vital that smaller locality based needs are addressed. I live in a small hamlet just outside Blakedown/Belbroughton/Hagley. The majority of the houses in this area are large family homes, or small cottages. There are many elderly residents that wish to downsize to suitable accommodation to suit their retirement needs and varying degrees of disability. They wish to stay in the area they have lived in for many years.</p> <p>It is vital that smaller individual sites are looked at to see if those needs can be accommodated as there is a distinct lack of bungalows and the type of property they need. Please ensure that this is included in the local plan assessment.</p>	Support and comments are noted.
CORE11	<a href="#">LPPO146</a>	1-14	Support	Support for paragraph 1.14.	Support is noted.
CORE11	<a href="#">LPPO147</a>	1-15	Support	Support for paragraph 1.15.	Support is noted.

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	<a href="#">LPPO416</a>	1.16	Object	<p>I object to Option A and Option B</p> <p>Green Belt land should be used only as a VERY LAST RESORT.</p> <p>The 5 year rolling time frame should allow for regular reviews of brown field sites and enable changes to be incorporated into the plan.</p> <p>Why are unnecessary decisions being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping?</p>	<p>Objections noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>We will be undertaking reviews of the Local Plan in the future, in line with Government requirements. Future Local Plans may also require Green Belt release if the housing need cannot be accommodated on land not in the Green Belt.</p>
Land Research & Planning Associates Ltd	<a href="#">LPPO535</a>	1.17	Comment	<p>By increasing the existing major conurbations for housing leads to the rural settlements becoming the "Cinderellas" of the planning system. It creates social divide and risks rural settlements not remaining sustainable and simply dying away because of an ageing population.</p>	<p>Comments noted.</p>



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				The expansion of rural settlements should be proportionate to that of the major settlements and this PO document is not sufficiently balanced to take account of this.	
	<a href="#">LPPO391</a>	1.16	Object	<p>I object to Option A and Option B.</p> <p>Green Belt land should be used only as a VERY LAST RESORT.</p> <p>The 5 year rolling time frame should allow for regular reviews of brownfield sites and enable changes to be incorporated into the plan.</p> <p>Why are unnecessary decisions being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping?</p>	<p>Objections noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>We will be undertaking reviews of the Local Plan in the future, in line with Government requirements. Future Local Plans may also require Green Belt release if the housing need cannot be accommodated on land not in the Green Belt.</p>
	<a href="#">LPPO3547</a>	Whole Plan	Object	I object to the whole plan.	Objection is noted.

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Land Research & Planning Associates Ltd	<a href="#">LPPO536</a>	1.18	Comment	<p>The PO should take better account of the lack of affordable homes and introduce a Policy where if land owners are willing to provide land near or adjacent to smaller rural settlements to accommodate a minimum of 50% affordable homes and/or starter homes this land should be designated in the PO particularly on the western side of the WFDC area which is not in Green Belt.</p> <p>It is not in compliance with the fully objectively assessed needs for market and <b>affordable housing</b> as the provision. Of the latter has not been properly addressed in the PO land/sites designation.</p>	As part of the Local Plan Review process we are considering affordable housing and there will be policies in the Local Plan which stipulate the affordable housing requirement expected from sites. This will be based on evidence, which includes the revised OAHN study and the Viability Assessment.
Environment Agency	<a href="#">LPPO1187</a>	Water Cycle Study	Comment	<p>It is imperative that a robust WCS is in place to inform a 'sound' plan that fully recognises the timings and costs associated with infrastructure planning in the water environment. Securing effective water resource policies and allocating development in appropriate areas, with adequate infrastructure in place (or planned), is an important element of the strategic planning remit.</p> <p>Site BR/RO/1 at Clows Top has issues with mains drainage connection and we have previously raised concerns with Severn Trent about the appropriateness of a non-mains foul drainage scheme in this location.</p> <p>We note table 10-1 of the WCS highlights some physical wastewater infrastructure capacity constraints in red. Whilst this does not appear to imply a significant barrier</p>	<p>The Water Cycle Study will be updated following the preferred options consultation and as part of the pre-submission plan stage. These comments from the EA will be considered as part of the WCS update.</p> <p>As part of the WCS update we will consider changes to the policy / guidance and plans, which will include the adoption of TAL as mentioned in this consultation response.</p> <p>We are not proposing to undertake any additional water quality modelling at this stage.</p>

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				<p>to development, we trust Severn Trent Water Limited will confirm following their further assessment. On this basis we have no significant cause for concern in relation to environmental infrastructure matters, related to water quality, as a result of the proposed development growth. We therefore consider the evidence base document robust enough to inform the Plan.</p> <p>In section 6.1.8 of the report, reference is made to the phosphate (P) treatment trials due to be completed in 2017. Wording in section A.10.8 and 6.1.8 could be amended. Although TAL is 0.25 it could still be possible to achieve the required P limit; so this should not prove a barrier to proposed growth.</p> <p>In Table 7 the WwTW future growth concentration is still reported as 4.94. We question whether this should have been updated to reflect the current observed P concentration of 0.63 (as in table 8). Note this has not impacted on the River Quality Planning (RQP) result.</p> <p>We would also question whether the BOD River target in table 13 should be 'high' rather than 'good' status.</p> <p>We note strong recommendations are made to utilise SuDS for surface water drainage from development, and we support this approach. We also support the fact that all aspects of sewerage network constraints, sewage treatment works capacity and related issues such as odour and flood risk from increased waste water</p>	

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				discharges have been considered.	
Persimmon Homes Limited	<a href="#">LPPO1599</a>	1.18	Comment	<p>Paragraph 182 of the NPPF - must adhere to in order to meet the tests of soundness, Plans must be positively prepared, justified, effective and consistent with national policy.</p> <p>Concern with the current drafting of the local Plan which needs to be addressed in order for the plan to be properly justified and effective as a tool to shape growth in the District. The Plan does not provide sufficient certainty that the Local Plan is capable of delivering growth which sufficiently boosts the supply of housing, as required by paragraph 47 of the NPPF and has not been prepared positively.</p> <p>Concern with proposed strategy in the Local Plan options and the distribution options proposed by the Council. Lack of housing provision in Bewdley, which have not been appropriately captured within the distribution strategy options. One new site (Catchems End) is proposed as part of one of the Council's options, this is tied up within a wider growth strategy that the Council to consider to be less sustainable than the preferred option. There is a risk that should the Council opt for its preferred option, Bewdley will not be assigned a level of growth appropriate to meeting the future needs of the town.</p>	Comments noted.

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Environment Agency	<a href="#">LPPO1186</a>	SFRA	Comment	<p>Strategic Flood Risk Assessment (February 2017)</p> <p>We previously queried discrepancies between flood zones and 1 in 100 year event plus climate change outline in detailed site summary maps. Note that section 5 has been updated and describes limitations of 2D modelling including effect on conveyance of floodwater through culverts and bridges. We advise that detailed modelling may be required to inform site specific FRAs for sites in flood zones 2 &amp; 3. Recommend that caveat is included for those sites affected.</p> <p>We previously identified lack of information on flood defences and climate change impacts. Note that section 4.6 of SFRA has been updated. We note that generally defences are expected to overtop increasing extent and depth of flooding. SFRA confirms detailed site specific FRAs should determine the extent of flood risk impacts on developments with regards to issues such as the setting of appropriate finished floor levels.</p> <p>Section 4.6 notes effects of climate change on some sites - BHS/11, BHS/16, FHN/9 which benefit from Kidderminster Flood Alleviation Scheme. SFRA confirms that residual risk should be addressed in site specific FRAs. Advise that caveat is included for site allocations.</p> <p>Note that section 7 includes further detailed assessment of climate change including implications for development and residual risk. Modelled outputs have</p>	<p>Comments are noted. The SFRA will be updated for the Pre-submission stage and these comments from the Environment Agency will be considered and actioned in the update. The updated SFRA will be used to inform the final site selection.</p>

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				<p>been used to give indication of risk of flooding above existing defence standards of protection and how climate change may affect this. The structural safety of dwellings and structures is also assessed.</p> <p>However, we have concerns that River Stour/Severn confluence has not had modelling done to assess flood scenario on River Stour. Site specific FRAs should investigate this to ensure safe development.</p> <p>Detailed site summary tables are comprehensive. However, table 12-1 does not include sites with ordinary watercourses such as OC/11, OC/12 and OC/13. These need to be assessed to inform flood risk. According to our maps, WA/BE/3 has a main river through the site with areas of FZ1, 2 &amp; 3. Table 12-1 states that 100% is in FZ1. This site should have been carried through to Level 2 Assessment.</p> <p>For site allocations which include areas of Flood Zones 2 and/or 3, we recommend your Council are satisfied there is sufficient land available within Flood Zone 1 to accommodate the proposed development (i.e. number of houses or hectares (ha) of employment land).</p>	
	<a href="#">LPPO3717</a>	1.18d	Object	<p>The proposals are unsustainable to continually allocate development land. We live on an island with finite land. What will the Council do when all of the land is used up – think of solutions that should have been put in place now? This simply passed the ultimate solution to our</p>	<p>Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need.</p>

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				children because the present Council is incapable of planning outside a never ending supply of land.	
	<a href="#">LPPO417</a>	1.18	Object	<p>I object to Option A and Option B</p> <p>Green Belt land should be used only as a VERY LAST RESORT</p> <p>The 5 year rolling time frame should allow for regular reviews of brown field sites and enable changes to be incorporated into the plan.</p> <p>The plan fails in its stated aim to "to use a robust and up-to-date evidence base to ensure that the local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" instead it aims to justify what developers want to deliver rather than meet the needs of Kidderminster residents.</p> <p>Previous attempts to build an Eastern relief road have failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph limit road following the same route as the current road routed from the Worcester Road through Mustow Green to the Birmingham Road - is it really a relief road at all?</p>	<p>Objections noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>We will be undertaking reviews of the Local Plan in the future, in line with Government requirements. Future Local Plans may also require Green Belt release if the housing need cannot be accommodated on land not in the Green Belt.</p> <p>A transport study is being undertaken to inform the next stage of plan-making. This will provide evidence on what road improvements will be required to</p>

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					sustain the level of proposed development in the District. This evidence will help to establish if the 'eastern relief road' that was consulted on at preferred options is necessary or if an alternative solution can be reached.
	<a href="#">LPPO3668</a>	1.18	Object	<p>I note you have omitted certain key requirements under the NPPF. I would draw your attention to the following:</p> <p><b>Section 4. Transport:</b> <i>“Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel. “</i></p> <ul style="list-style-type: none"> <li>This has not been sufficiently evidence in your plan to support the vast increase in commuters who will most definitely travel to Birmingham and other key cities using public transport. Your proposals are insufficient to meet the proposed demand.</li> </ul> <p><b>Section 8: Section 70.</b>  <i>“The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local</i></p>	Objection and comments noted.



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				<p><i>planning authority should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.”</i></p> <ul style="list-style-type: none"> <li>• You have not shown sufficient evidence in your plan to meet the above requirements. Schools are in adequate and not sufficient to meet the needs of the number of additional residents proposed under the housing developments.</li> </ul> <p><i>Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.</i></p> <ul style="list-style-type: none"> <li>• I believe you have already begun negotiations with Persimmon homes and others before offering this. I will be submitting a freedom of information request</li> </ul> <p><b>Section 8:</b> <i>Section 76: Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.</i></p> <ul style="list-style-type: none"> <li>• You have not evidence special circumstances. The fields at Spennells satisfy all requirements to</li> </ul>	

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				<p>be protected under Green Belt.</p> <p><i>Section 77 :The designation can be used where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field),tranquillity or richness of its wildlife;</i></p> <p><b>Section 9. Green Belt:</b> <i>“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to <u>prevent urban sprawl</u> by keeping land permanently open; the essential characteristics of Green Belts are their <u>openness and their permanence</u>. Green Belt serves five purposes:</i></p> <ul style="list-style-type: none"> <li><i>• to check the <u>unrestricted sprawl</u> of large built-up areas;</i></li> <li><i>• to prevent neighbouring towns merging into one another;</i></li> <li><i>• to assist in safeguarding the countryside from encroachment;</i></li> <li><i>• to preserve the setting and special character of historic towns; and</i></li> <li><i>• To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”</i></li> </ul>	
CORE11	<a href="#">LPPO148</a>	1-18	Support	Support for paragraph 1.18.	Support is noted.

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	<a href="#">LPPO471</a>	1.19	Comment	We are part of the Greater Birmingham and Solihull LEP and we need to ensure any development is in keeping with the uniqueness of Wyre Forest District, I think that the need to increase our housing stock by such a large amount is to attract commuters from Birmingham and surrounding areas. This I think is not the best way forward for Wyre Forest District. Commuters will not bring income into our shopping centres or our tourism activities as they will be spending where they work and spending their leisure time in town.	Comments noted.
	<a href="#">LPPO418</a>	1.19	Comment	<p>Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collectively review overall brown field site availability and plan housing development accordingly.</p> <p>Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years;</p> <p>Whilst economic development in Kidderminster will be welcome - past experience shows this will take time</p> <p>Artificial borders should not apply when making decisions to destroy the Green Belt.</p>	<p>Comments noted. The Black Country Local Authority areas are undertaking a joint Local Plan Review. Solihull Council is also undertaking a review of its Local Plan. Birmingham City Council adopted their Local Plan in January 2017. The other Worcestershire Local Authorities have started a review of their Local Plans. All of these Local Authorities will be looking at what brownfield sites they have in their Local Plan Reviews.</p> <p>In terms of the emerging Local Plan for Wyre Forest, we have looked at brownfield sites but we don't have enough deliverable brownfield sites to accommodate all of our housing need.</p>
	<a href="#">LPPO433</a>	1.18 (d)	Comment	What percentage buffer will WFDC have to incorporate into the plan? What has the past performance of WFDC	The Inspector's report for the Gladman appeal public inquiry (published March

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				been?	2018) concluded that a 20% buffer should be applied to the Council's 5 year housing land supply calculation. However, the Council will follow National Planning Policy guidance on this matter which has been published since the appeal case.
	<a href="#">LPPO4897</a>	1.19	Comment	The proposed Option A (and also Option B to a large extent), concentrates development along the eastern side of Kidderminster. A requirement of the Local Plan is that development should be proportionate to the capacity of the district. The potential of several thousand dwellings being built along this corridor is surely disproportionate.	Comments noted.
	<a href="#">LPPO3718</a>	1.19	Object	It is preposterous to state that the two LEP's 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, proportionate to the capacity of the District. This is the reason why Easter Park has laid 50% empty since construction, many of the shops in Oxford Street, Worcester Street and Coventry Street and others lay empty creating an eye sore of unattractive town centre environment and security problem at night. This is evidence that the planning team are not in tune with reality and how to address what is really required	Objection is noted.

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				<p>for the town of Kidderminster. There is little confidence in this plan and to the level of development planned for the area when they have struggled in the past to achieve ambition.</p> <p>I take note of the statement ‘...and does not undermine the unique character of the area’ which certainly would be the case if the proposed level of development goes ahead. There is evidence of a disconnect between what is proposed and what happens in practice. I object to the plan as proposed, the development should be scaled down to meet realistic demand and not to undermine the character of the area to become sole-less like Redditch.</p>	
	<a href="#">LPPO2933</a>	1.19	Object	<p>Policies of the Local Plan Review do not seem to require flexible design and layouts ‘future proofing’ development so as to take account of important population changes such as ‘ageing’ over the plan period.</p> <p>Although the LPR states (1.19) that Wyre Forest housing market ‘constitutes a self contained Housing Market Area’, considering the statistics at table 8.0.4 and 2.9 the social issues of</p> <ul style="list-style-type: none"> <li>• static population growth;</li> <li>• a very high proportion of resident aged 65+</li> <li>• the need to ensure that residential development</li> </ul>	Objection and comments noted.

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				<p>caters for all groups in society’,</p> <p>It makes limited proposals for how this apparent lack of appropriate housing mix could be achieved (8.16, beyond bungalows for the 65+ age group). Higher quality homes and those that 65+ might be prepared to downsize to are not represented in any detailed way, although affordable housing is mentioned. Para 6.9 only refers to what ‘might’ happen, rather than what ‘will’ happen-seeking to address the management of supply in all its house-type range/ownership, via approved policies that follow through from the comments of 8.16. Where is adaptability for the future and building codes?</p>	
	<a href="#">LPPO393</a>	1.18	Object	<p>I object to Option A and Option B</p> <p>Green Belt land should be used only as a VERY LAST RESORT</p> <p>The 5 year rolling time frame should allow for regular reviews of brown field sites and enable changes to be incorporated into the plan.</p> <p>The plan fails in its stated aim to "to use a robust and up-to-date evidence base to ensure that the local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" instead it aims to justify what developers want to deliver rather than meet the needs of Kidderminster residents.</p>	<p>Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>The Transport evidence base work that is being produced to inform the Pre-</p>

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				Previous attempts to build an Eastern relief road have failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph limit road following the same route as the current road routed from the Worcester Road through Mustow Green to the Birmingham Road - is it really a relief road at all?	Submission Plan will establish what road improvements the proposed new development will require and if an eastern relief road is necessary.
	<a href="#">LPPO395</a>	1.19	Comment	<p>Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collectively review overall brownfield site availability and plan housing development accordingly.</p> <p>Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years;</p> <p>Whilst economic development in Kidderminster will be welcome - past experience shows this will take time.</p> <p>Artificial borders should not apply when making decisions to destroy the Green Belt.</p>	Comments noted.
Gladman Developments Limited	<a href="#">LPPO1572</a>	1.21	Comment	Any issues of unmet housing need arising from relevant neighbouring and near-by local authorities must be fully considered through the preparation of the Local Plan, working under the auspices of the 'duty to cooperate'. This should involve all other LPAs in the HMA plus any others that there is a clear functional relationship with.	Comments noted. We continue to have Duty to Cooperate meetings with our neighbouring Local Authorities throughout the Local Plan making process.

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				<p>Where necessary, a strong policy mechanism will be required within the Local Plan to demonstrate that unmet housing needs arising from relevant neighbouring authorities and those with a clear functional relationship will be met during the plan period.</p> <p>In order to fulfil the objectives of the Plan it is essential that the relationship of the area with its neighbours is carefully considered and that the housing and economic development requirements of the wider area are fully explored and given appropriate consideration through the plan making process.</p>	
	<a href="#">LPPO4469</a>	OAHN	Comment	Concern over the Housing figures - District stated as having stagnant population growth yet the Consultants have identified the need for so many new houses?	Comment is noted. The Objectively Assessed Housing Needs Study will be updated using the Government's new standardised methodology for calculating housing need. The latest population and household projections will also be used.
Taylor Wimpey West Midlands	<a href="#">LPPO4948</a>	LI/5 - Green Belt Review	Comment	In Green Belt Review site is identified as making a 'contribution' to the purposes of the GB. "The site is part of large tract of land forming a substantial part of the open countryside between Stourport, Kidderminster and Bewdley which makes a significant contribution to preventing sprawl, merger of towns, encroachment and the identity of towns. Thus, in principle, development would constitute harm to the Green Belt, although the local geography modifies this. Overall the land does make a contribution	Comments noted.



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				<p>to Green Belt purposes, specifically in respect of sprawl and protection against encroachment into open countryside. The enclosed character of this site and its close relationship with the existing urban edge means that damage to the purposes of the Green Belt is reduced.”</p> <p>TW has considered release of site from GB within context of 5 GB purposes.</p> <p><i>1) To check the unrestricted sprawl of large built-up areas</i></p> <p>Site has strong defensible boundaries which would round-off town at this location. Northern part of site is not proposed for development so any development would be contained well within existing building line. It will ensure visual separation of Stourport and Bewdley.</p> <p><i>2) To prevent neighbouring towns merging into one another</i></p> <p>Considerable green gap between Stourport and Bewdley. Development would not close this gap.</p> <p><i>3) To assist in safeguarding the countryside from encroachment</i></p> <p>Site offers opportunity to provide strong and defensible</p>	

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				<p>boundaries.</p> <p><i>4) To preserve the setting and special character of historic towns</i></p> <p>Stourport's conservation areas and associated Listed Buildings are not located in vicinity of site. Release of site will not compromise setting of heritage assets.</p> <p><i>5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</i></p> <p>Release of this site would not prevent derelict and urban land coming forward. It can be phased in the housing trajectory to take account of availability and deliverability of brownfield sites.</p> <p>TW assert that site makes a 'limited contribution' to Green Belt purposes. Given the enclosed nature of the site and the prevailing building line and development limit to the north-east, the development of the site would not result in increased sprawl towards Bewdley.</p>	
Taylor Wimpey West Midlands	<a href="#">LPPO4950</a>	Sustainability Appraisal AKR/15	Comment	<p>The site represents a sustainable location for development as evidenced within SA which forms part of Local Plan evidence base. The site has been scored against 13 objectives.</p> <p>TW broadly support the SA findings but feels SA objective 5 (reduce need to travel etc.) should not be '!'</p>	Comments noted.

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				<p>but '+' as site is in sustainable location and a travel plan will be submitted for the development. Objective 8 (to protect/enhance landscape) - do not agree that development will have negative impact on landscape - no scheme details yet. There is more than enough space to provide significant landscape enhancements to improve relationship between urban edge and landscape. Suggest score is changed to '0' or '?'. Objective 13 (maintain/enhance settlement identity) - scores '-'. Disagree as scale of development is small within context of larger settlement. Development is capable of reflecting local character and identity through layout and use of materials.</p>	
Campaign to Protect Rural England	<a href="#">LPPO956</a>	1.22 HELAA	Comment	<p>We have looked at all sites assessed as indicated by the Assessment sheets on the website. We have not commented on every site, particularly not those with an active planning consent or which are urban brownfield. The comments appear in alpha-numeric order by settlement. The views expressed range from supportive of the Council's position to hostile to it. Comments attached in separate document.</p>	Comments noted.
Taylor Wimpey West Midlands	<a href="#">LPPO2249</a>	Sustainability Appraisal site LI/5	Comment	<p>The site represents a sustainable location for development, as evidenced within Sustainability Appraisal (SA), which forms part of the Local Plan evidence base. Taylor Wimpey broadly supports the findings. However, objective 5 (to reduce need to travel etc.), should be either a '+'. Feel that development can reduce need to travel as is in sustainable location.</p>	Comments noted.

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				<p>Development will include submission of travel plan.</p> <p>Objective 8 - TW feel do not agree that site would have minor impact on landscape and townscape as no details of scheme are known at this stage. Significant landscape enhancements are likely. Suggest score should be '0' or '?'.</p> <p>Objective 13 - disagree with '-' score. Scale of development within context of Stourport is not significant so will not erode identity. Development is capable of reflecting local character through layout and use of materials. Consider site should score '0' or '?' at this stage.</p>	
Taylor Wimpey West Midlands	<a href="#">LPPO4920</a>	OC/13 - Green Belt Review	Comment	<p><b>Green Belt:</b> Land at Comberton Road lies within West Midlands Green Belt. Review of Green Belt undertaken by Amec Foster Wheeler assesses different parcels against Green Belt purposes.</p> <p>In response to this analysis, the LPRPO includes significant reinforcement of western boundary of site including large amounts of open space and landscaping.</p> <p>TW has considered the release of the site from the GB in context of 5 purposes of GB and concludes that sites makes a limited contribution:-</p> <p><i>1) To check unrestricted sprawl of large built-up areas</i></p>	Comments noted.

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				<p>Site boundaries would be reinforced by 30m planting buffer along length of development. This would strengthen urban edge. It would not encourage sprawl.</p> <p><i>2) To prevent neighbouring towns merging into one another</i></p> <p>Gap of &gt;10km between Kidderminster and Bromsgrove. Site is located immediately adjacent to existing built-up area and is clearly separated from nearby settlements by extensive agricultural land.</p> <p><i>3) To assist in safeguarding the countryside from encroachment</i></p> <p>Site offers opportunity to provide strong defensible boundaries to protect countryside and maintain visual and physical separation between Kidderminster and surrounding settlements.</p> <p><i>4) To preserve the setting and special character of historic towns</i></p> <p>Kidderminster's conservation areas and associated listed buildings are not located close to site. Listed buildings scattered within village of Stone are closer and their sensitivity will be taken into consideration. Release of this site will not compromise setting or character of historic towns.</p>	

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				<p>5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land</p> <p>Release of this land would not prevent recycling of derelict and other urban land. Supply of brownfield sites is now reducing and development of this site can be appropriately phased within housing trajectory to take account of availability and deliverability of brownfield sites.</p>	
Taylor Wimpey West Midlands	<a href="#">LPPO4946</a>	Sustainability Appraisal site OC/13	Comment	<p><b>Sustainability:</b> Site represents sustainable location as evidenced in SA. SA has assessed site against 13 objectives. TW do not agree with scoring for objective 8- no details of a scheme are known so cannot assert that development would have minor impact on landscape and townscape. Scheme could provide significant landscape enhancements - score should be '0' or '?' at this stage.</p> <p>Taylor Wimpey supports the notion that the development of the site would enhance the provision and accessibility of local services and facilities as well as reducing the need to travel by unsustainable modes.</p>	Comments noted.
Taylor Wimpey West Midlands	<a href="#">LPPO4947</a>	Sustainability Appraisal site OC/6	Comment	<p><b>Sustainability:</b> Site represents sustainable location as evidenced in SA. SA has assessed site against 13 objectives. TW do not agree with scoring for objective 8- no details of a scheme are known so cannot assert that development would have minor impact on landscape and townscape. Scheme could provide significant landscape enhancements - score should be '0' or '?' at</p>	Comments noted.

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				<p>this stage.</p> <p>Site scores single negative against objective 9b - but with no scheme details known impact on protected species cannot be known at this stage.</p> <p>Taylor Wimpey supports the notion that the development of the site would enhance the provision and accessibility of local services and facilities as well as reducing the need to travel by unsustainable modes.</p>	
	<a href="#">LPPO4139</a>	1.22 HELAA	Comment	<p>The HELAA Report draws on Government policy and makes a clear statement of how important it is to protect open green space for the health of the community. The report also shows that if the actual need for new houses was less than 3697, no Green Belt land would be required, and if the actual need were less than 4476, only brownfield Green Belt land would be required.</p> <p>8378 Green field Green Belt sites have been identified! This number obviously shows the absolute need to protect the Green Belt immediately and permanently.</p>	<p>The HELAA shows that if all the non-Green Belt sites came forward for development at the capacity stated, then 3696 dwellings could be provided. However, the HELAA also states at paragraph 3.1 that many of the urban brownfield sites are likely to come forward for a mix of uses and until further viability work is undertaken, the exact mix cannot be determined. Many of the site capacities are likely to be lower than shown. Also, not all of the listed urban brownfield sites will necessarily be available for residential development. Some may be retained for commercial uses.</p> <p>Open space, sports and recreational land is protected by policy. These are sites</p>

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					<p>outside of the Green Belt. The Green field Green Belt sites listed have almost all been submitted by landowners. In most cases, capacity has been calculated using a standard methodology as set out in the HELAA report. There is no suggestion in the report that these sites should be developed. All sites will be assessed against the full set of evidence studies and a decision on whether to propose allocation or not will be taken once the results of these different studies have been assessed. It should be noted that Greenfield Green Belt sites are not the same as open space, sports and recreational land.</p>
	<p><a href="#">LPPO4838</a></p>	<p>1.22 Green Belt Review</p>	<p>Comment</p>	<p>My knowledge and interest are in the “Option A” proposals relating to the following areas:</p> <ul style="list-style-type: none"> <li>• Rear of Spennells &amp; Easter Park (AS/10)</li> <li>• Land off Stanklyn Lane (WFR/ST/2)</li> <li>• Stone Hill South (OC/13) – Part, the field to the south bounded by Stanklyn Lane, a PRoW to the west, a hedge to the north and a field locally known as “The Gallops” to the east. Carrots are currently being grown in this field.</li> </ul> <p>The AMEC report commissioned by WFDC appears to be balanced although some of the detail is questioned. This</p>	<p>Comments noted.</p>



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				<p>is not reflected in the in the WFDC Preferred Options Document (POD) which seems to lean towards Option A. The POD does not acknowledge the full input and importance of this AMEC report as it is clearly a major piece of work identifying the sites. It is briefly referred to and does state that ‘these studies demonstrate that across the District the Green Belt fulfils its intended strategic purpose as part of the West Midlands Green Belt with many instances of more than one Green Belt purpose being fulfilled’.</p> <p>The AMEC Report clearly identifies significant encroachment and impact on the Green Belt, which, it claims, can be dealt with by “Masterplanning”. This is a very vague argument.</p> <p>There is no justification for demand based upon projected population increase as shown in the Worcestershire County Council research.</p> <p>The AMEC report notes that: ‘The most significant impact on the Green Belt is to the south east and north east of Kidderminster, the two locations which are the focus for much of the development. In each case the scale of development means that a new relationship between town and country will need to be created through comprehensive masterplanning. What is meant by the statement that ‘ ... a new relationship between town and country will need to be created through comprehensive masterplanning’ in my opinion can be</p>	

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				<p>interpreted any way required and as such is not a useful argument for or against option A.</p> <p><b>Land at Stone Hill (Part as described previously) OC/13;</b>                      I cannot disagree with the statement that ‘.....although the scale and topography of the site means that a new relationship between town and country would be created, extending development into visually exposed land where thus far development has used the topography to limit such exposure. This is particularly the case for land extending towards Stanklyn Lane, in combination with proposed land immediately to the southwest, although further work on long and medium distance visual receptors would be needed’. It is not clear what is meant by the statement that ‘visual receptors would be needed’. If this part was developed on it’s own it certainly would be a rectilinear intrusion and sprawl into the Green Belt. The report fails to note the presence of National Grid electricity power lines and pylons crossing the site from Stanklyn Lane. These would inhibit development. The site falls towards Stanklyn Lane causing drainage problems but not in the Council or AMEC Reports. Successful crops of potatoes, onions and currently carrots are grown here.</p> <p><b>Land off Stanklyn Lane WFR/ST/2:</b> I agree with the statement made by the AMEC report that ‘the site slopes from the plateau at 60m, which holds and conceals the urban edge, down to Stanklyn Lane and has extensive views south eastwards across open</p>	

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				<p>countryside’. It goes on to say that ‘the site has substantial hedgerow boundaries, apart from that abutting the urban edge which comprises garden fences, but is visually exposed to Stanklyn Lane because of its sloping aspect’. This last statement gives the impression that the urban boundary is exposed to Stanklyn Lane but it is not. In fact, this boundary is the boundary of the old Municipal Borough of Kidderminster as shown on historic OS maps The AMEC Report has already stated that it is concealed behind the plateau. In its existing form there is complete connection with the wider open countryside and the impression of urban sprawl is concealed. The statement that ‘...there is a degree of connection with the wider open countryside’ appears to me to be misleading. There is complete connection with Stanklyn Lane in the valley of the rolling countryside each side. I strongly disagree with the statement that ‘landscape character and condition is of average quality, but with some evidence of the withdrawal of active land management evidenced through poor crop growth (in contrast to arable cultivation on land immediately to the north east)’. The photographs in the report evidencing this were clearly taken some time ago. Some attempts at organic farming had taken place with what appeared to be limited success and there had been crop failures. The farmer currently working the land is having a successful crop of Barley and there have been other successful crops of sugar beet in particular. It is my understanding that the current farmer rents the land from the landowner and it must therefore be commercially viable.</p>	

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				<p>I would say that the character of the landscape is very good and not average as stated in the AMEC Report. I have seen flocks of linnets and the occasional yellowhammer and corn bunting amongst others. I understand these species of birds are endangered.</p> <p>Views from the plateau are magnificent with Brown Clee to the north, St Mary’s Church, Stone, and the Clent Hills beyond to the east and Abberley and Woodbury Hills to the west. The latter being the site of the encounter in 1405 between the armies of Owen Glendower and Henry IV.</p> <p>The AMEC Report goes on to state ‘that development would create a new urban edge to the town on south easterly facing site, although in combination with adjacent sites, masterplanning could mitigate the direct visual impact of development and hence perception of spillage of the town into open countryside’. In my view the use of the word “masterplanning” can mean anything you want and does not contribute to the argument one way or the other.</p> <p>The AMEC report continues: ‘overall the site makes a contribution to Green Belt purposes by virtue of its role in containing the southern edge of Kidderminster and having a strong visual connection with the wider countryside across Stanklyn Lane’. If the statement is referring to the current Green Belt I cannot disagree</p>	

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				<p>with it.</p> <p><b>Land R/O Spennells &amp; Easter Park AS/10:</b> I agree with the statement in the AMEC Report that ‘The site contributes to the Green Belt in this location, in combination with land to the east, containing the southerly edge of Kidderminster and connecting visually (in combination with adjacent land to the east) with the wider countryside to the south’.</p> <p>I disagree with the statement that ‘The site is well contained, level and not visually exposed, and as such development would not create uncontrolled sprawl overly intrusive encroachment into open countryside’.</p> <p>As shown on the contours of OS maps there is at least a 10m fall across the site towards Stanklyn Lane. The site touches the boundary with Wychavon District Council and if developed there would be no Green Belt on this boundary within Wyre Forest District.</p> <p>There is a high risk of flooding on the southern boundary. The site falls towards Stanklyn Lane causing drainage problems as previously discussed in my comments but not in the Options or AMEC Reports.</p>	
	<a href="#">LPPO4438</a>	Growth	Comment	Wyre Forest has a population growth below the national average and within the guidance, Housing and Economical Development Needs Assessments 2015, it states that the ‘Assessing development needs should be proportional and does not require local councils to	Comment is noted. The Objectively Assessed Housing Needs Study will be updated using the Government’s new standardised methodology for calculating housing need. The latest

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				consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur'. It seems that the Council have over-estimated the number of houses required. In your own document, you state that there has been a virtually static population growth, so why do we need 4800 to 6000 extra houses?	population and household projections will also be used.
	<a href="#">LPPO2697</a>	OAHN, HELAA,	Object	<p>Wyre Forest District Council contents of their own documents:</p> <p>Draft Local plan: <i>'Virtually static population growth.'</i></p> <p><i>'National Planning Policy Framework (NPPF) makes it clear that it is necessary for the evidence base for all Local Plans to be up to date.'</i></p> <p>Helaa:</p> <p><i>'2.20 The protection of open space is vital for ensuring healthy communities. Existing open space, sports and recreational land should not normally be released for development unless it can be demonstrated to be surplus to requirements, be replaced elsewhere or need for the development clearly outweighs its loss.'</i></p> <p><i>'2.21 Inappropriate development in areas of flood risk should be avoided by directing development away from areas of highest risk. Where development is necessary, mitigation measures should be put in place to ensure</i></p>	Objection is noted. The Objectively Assessed Housing Needs Study will be updated using the Government's new standardised methodology for calculating housing need. The latest population and household projections will also be used.

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				<p><i>that flood risk is not increased elsewhere. Sites which suffer from fluvial or surface water flooding will only be considered suitable where it can be shown that development would not increase flood risk.'</i></p> <p>OAHN:</p> <p><i>'the latest 2014 mid-year population estimate (MYE) for Wyre Forest suggests a population of 98,960, a 2.1% increase since 2001. This rate of growth is lower than the West Midlands regional average of 8.2% and the average England growth rate of 9.8%'</i></p> <p>1. <u>Brief Summary</u></p> <p>The Draft Local Plan is based on the OAHN. This document is totally flawed in that it fails in its legal duty to use the latest statistical data in its calculations. Specifically the Vacancy rate used is out of date. It assumes that a further 1.3% of houses will become vacant after the plan is completed. This will be a disaster for Kidderminster as it will cause a collapse in house values. Whilst this will not help people who simply cannot afford to buy houses it will damage current house owners and the developers who are to build the houses. The draft local plan states that the population of Wyre Forest is static and it then allows the OAHN to use a population growth of 8%. This is evidently incorrect. It is very difficult to understand why Wyre Forest District Council has accepted this number when it is obviously</p>	

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				<p>wrong and will lead to unnecessary development on Green Belt Land.</p> <p>a) The primary duty of Wyre Forest District Council is to care for its residents. Building housing which is not required and destroying Green Belt is the opposite of what the council should be doing. The plan virtually ignores the housing requirements of the most needy assuming that people can leap from homeless to affordable housing. It shows no care for those who can-not afford affordable housing.</p> <p>b) The Consultation process is flawed and unsafe.</p> <p>c) There are very profitable possibilities to build homes and considerably improve Kidderminster which haven't been considered.</p> <p>d) Wyre Forest District Council are being deliberately evasive about the route and the nature of the relief road, not wishing to 'come clean' until Plan A has been approved.</p> <p>e) Wyre Forest District Council have disregarded the damage to the well being and health of considerable numbers of people who rely on these fields, and are prepared to destroy the habitat of a large number of species including threatened species</p> <p>3. <u>Analysis of Housing Requirements Projections</u></p> <p>I. <u>HELAA report</u></p>	



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				<p>I have added up availability presented in the Helaa report.</p> <table border="0" data-bbox="853 411 1547 917"> <tr> <td><b>Section</b></td> <td><b>No of</b></td> </tr> <tr> <td></td> <td><b>Dwel</b></td> </tr> <tr> <td>A. Sites Under construction</td> <td>582</td> </tr> <tr> <td>B. Non implemented Planning Permissions</td> <td>393</td> </tr> <tr> <td>C. Deliverable sites next 5 years</td> <td>1405</td> </tr> <tr> <td>D. Urban Brownfield Sites beyond 5 years</td> <td>490</td> </tr> <tr> <td>E. Urban Greenfield Sites beyond 5 years</td> <td>116</td> </tr> <tr> <td>F. Rural Brownfield Sites</td> <td>29</td> </tr> <tr> <td>G. Rural Green Field Sites</td> <td>681</td> </tr> <tr> <td>H. Green Belt Brownfield Sites</td> <td>779</td> </tr> <tr> <td>I. Green Belt Green Field Sites</td> <td>8377</td> </tr> </table> <p>1. If the actual need were less than 3697, no Green Belt land would be required.</p> <p>2. If the actual need were less than 4476, only brownfield Green Belt land would be required.</p> <p>3. 8377 Green field Green Belt sites have been identified. This number obviously shows the absolute need to protect the Green Belt immediately and permanently.</p>	<b>Section</b>	<b>No of</b>		<b>Dwel</b>	A. Sites Under construction	582	B. Non implemented Planning Permissions	393	C. Deliverable sites next 5 years	1405	D. Urban Brownfield Sites beyond 5 years	490	E. Urban Greenfield Sites beyond 5 years	116	F. Rural Brownfield Sites	29	G. Rural Green Field Sites	681	H. Green Belt Brownfield Sites	779	I. Green Belt Green Field Sites	8377	
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				<p>II. <u>Rounding – Justification?</u></p> <p>If the OAHN report is accepted, then the requirement is calculated at 284 dwellings per year. The report then rounds up this number to 300 dwellings per year. This simple unjustified action requires the building of 240 houses over the 15-year period</p> <p>A section of Green Belt land will be used for building 240 houses purely because of a rounding up. Who does the rounding up benefit? It allows developers to build more executive houses and therefore increase their profits. Is the Council not here to serve the residents?</p> <p>III. <u>Vacancy rate</u></p> <p>The OAHN report says that the number of vacant properties in Wyre Forest is 3.2%</p> <p>It says that there are currently 44490 dwellings in Wyre Forest</p> <p>It then increases the allowance for vacant properties to 4.5 %. Whilst the 4.5% figure is taken from the 2011 census, Wyre Forest District Council is legally obliged to use the most up to date data available, i.e., the current Council Tax data. There is no logical reason to use the 4.5% figure instead of 3.2%</p>	

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				<p>The difference between 3.2% and 4.5% is 1.3%</p> <p>There are 44490 dwellings in Wyre Forest</p> <p>This means that extra 44490 x 1.3% dwellings will be built or 578 dwellings (39 per year).</p> <p>In other words, because the OAHN consultants have chosen, without statistical justification, to increase the vacancy rate by 1.3%, 578 houses will be built on the Green Belt in order to allow for them to remain vacant.(I have based the vacancy rate on 44490 making it an underestimate)</p> <p>IV. <u>The main OAHN calculation of housing requirement.</u></p> <p>It is impossible for a mere mortal to analyse the OAHN report and discover how the housing requirements were calculated making it impossible to analyse and challenge.</p> <p>I have tried to replicate the calculations using data provided by the OAHN report.</p> <p>I have looked at 2 population growth figures, 8.2 % which is a national average that obviously doesn't apply to Wyre Forest, and 2.1% which is the actual growth</p>	

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				<p>figure of population in Wyre Forest since 2001.</p> <p>Whilst I have used this figure it is my understanding that the population growth was all weighted to before 2011 and there has been nil growth since 2011. The figures also make no attempt to factor in potential population decline as the considerable number of European citizens in Wyre Forest falls post Brexit.</p> <p>I will try to explain my calculations as I do them: Latest population figure for Wyre Forest: 98960</p> <p>Number of occupied dwellings: 43086</p> <p>Average number of occupants per dwelling (98960/43086): 2.2968</p> <p>(note: I have not made any attempt for allowing this average to decrease)</p> <table style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: right;">Population Growth</td> <td></td> </tr> <tr> <td style="text-align: right;">2.1%</td> <td></td> </tr> <tr> <td style="text-align: right;">Population Growth from 98960</td> <td></td> </tr> <tr> <td style="text-align: right;"><b>2078</b></td> <td></td> </tr> <tr> <td style="text-align: right;">Dwellings required</td> <td></td> </tr> <tr> <td style="text-align: right;">(growth divided by 2.2968)</td> <td style="text-align: right;"><b>904</b></td> </tr> </table>	Population Growth		2.1%		Population Growth from 98960		<b>2078</b>		Dwellings required		(growth divided by 2.2968)	<b>904</b>	
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				<p>Dwellings per year</p> <p>(over 15 yrs) <b>60</b></p> <p>As a check as to whether my calculations work, if I add together the increased number of houses to be left vacant and the houses required for increased population at 8.2% it comes to <math>235 + 39 = 274</math> per year. This is so close to 284 that I feel that my simplistic calculation is somewhat less flawed than the number by which the consultants have rounded their calculation up.</p> <p><u>V. Conclusion</u></p> <p>The figures used to calculate the housing requirement have been deliberately maximised to produce the highest possible number of houses required.</p> <p>There is absolutely no need to round the figures upwards.</p> <p>The use of 4.5% vacancy is out of date and should not have been used.</p> <p>The population growth figure taken by the OAHN has no basis in the reality of Wyre Forest. 2.1% is a far more realistic figure.</p>	<p><b>235</b></p>

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				This means that the housing requirement over the 15 year period of the local plan is far closer to 904 than 6000. The plan is totally flawed and must be totally withdrawn. There is absolutely no requirement to build on the Green Belt in Wyre Forest.	
	<a href="#">LPPO2805</a>	Housing Numbers	Object	The statistics used are unfounded. 284 homes per annum are needed but this has been rounded up to 300 by Wyre Forest District Council is slap dash. That not all these houses would be affordable homes is unbelievable. To use statistics based on other parts of the country is deliberately misleading. The population of Wyre Forest & Kidderminster is static or likely to fall in the light of Brexit.	Objection is noted. The Objectively Assessed Housing Needs Study will be updated using the Government's new standardised methodology for calculating housing need. The latest population and household projections will also be used.
	<a href="#">LPPO4591</a>	Green Belt Review	Object	In the Green Belt review, some of the assessment is wrong and coalescence will occur if Option A were to be pursued.	Objection is noted.
	<a href="#">LPPO3269</a>	Evidence base	Object	Conflicting statistics available that state the number of new dwellings required and associated infrastructure is considerably less than is proposed in the Local Plan review. Figures from the ONS suggest that the additional population requirement is more like 100-200 homes per year. The 6,000-home target is completely unnecessary.	The 6,000 figure was calculated from the Objectively Assessed Housing Needs (OAHN) Study which concluded that 300 new dwellings per annum would be required over the plan period. In addition to this there is a requirement for C2 use (i.e. care homes for the elderly).  However, since the Preferred Options document was published, the Government has introduced a

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					standardised methodology for calculating housing need. The OAHN study is therefore being updated to use the new standardised methodology and will also use the most up-to-date population and household projection data available. This revised housing need requirement will be used to inform the emerging Pre-Submission Plan.
	<a href="#">LPPO3719</a>	1.22	Object	The evidence presented within the OAHN is flawed as it is not objective but subjective in core areas. The text states that the information has simply been taken into account and does not say how this has been checked, challenged or audited in anyway and exposes the Council to development that is overly stated and unsustainable. Again, the plans are unsustainable and based upon subjective rather than objective evidence.	Objection is noted. The Objectively Assessed Housing Needs Study will be updated using the Government’s new standardised methodology for calculating housing need. The latest population and household projections will also be used.
	<a href="#">LPPO3938</a>	1.22 OAHN	Object	<p>The OAHN is fundamentally flawed and ambiguous. It concludes: In conclusion a review of Market Signal data suggests that the housing market across Wyre Forest is relatively stable and that currently there are no indicators prompting a need for adjusting the housing dwelling requirement. However, the Council should monitor comparable data on a regular basis to ensure it has up to date information from which to review dwelling targets.’</p> <p>The Housing and Economic Development Needs Assessments (GOV.UK) states ‘There is no one</p>	Objection is noted. The Objectively Assessed Housing Needs Study will be updated using the Government’s new standardised methodology for calculating housing need. The latest population and household projections will also be used.

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				<p>methodological approach or use of a particular dataset (s) that will provide a definitive assessment of development need. The use of this standard methodology set out in this guidance is strongly recommended because it will ensure that the assessment findings are transparently prepared. The assessment should be thorough but proportionate.</p> <p>In my view, further investigation into the process by which Wyre Forest District Council have arrived at their assessment of housing needs, should take place, in order to comply with the above.</p> <p>The OAHN Report states that the census is a relevant source, which would be the most accurate measurement of growth within Wyre Forest over the past 15 years. This data is then discarded and in replacement it uses arbitrary national and regional figures to arrive at the final growth rate. WFDC are able to utilise census data to inform a growth rate of 3000, which could be accommodated within brownfield sites.</p> <p>8.6 quote ‘We propose that the OAHN should be 300 dwellings per year. The figure sits at the upper end of the dwelling requirements’</p> <p>If the lower end figure of required dwellings were accepted, it could result in up to 100 fewer dwellings required per annum, and could possibly meet anticipated housing need, whilst reducing the</p>	



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				<p>requirement for release of Green Belt land. It would also comply with the Council’s duty to regularly monitor housing need, as concluded in OAHN Report.</p> <p>The OAHN Report recommends that dwelling requirements per annum are in the region of 199 – 326. WFDC are using the worst case scenario. A further in-depth examination of the figures suggests that the need for land could be reduced.</p> <p>I am concerned that, given the static, ageing population, current available housing stock of 1400 plus dwellings, why a more conservative figure cannot be considered by Wyre Forest District Council. It would appear that, further challenge of the data is required.</p> <p>The Office for National Statistics Sub National Population Projections (SNPP) evidences a growth in population for the period of 4.75 and a requirement of 199 dwellings per annum. This would bring about a reduction of 1818 dwellings over the period bringing the total down from 5400 to 3582. The plan figure of 300 dwelling per year seems to be based on a population growth of 7.7%, which is considerably higher than the last 14 years.</p> <p>8.12 quote ‘No cross boundary demands from neighbouring authorities have been identified in current plans. However, discussions are on going regarding a shortfall of provision in Greater Birmingham HMA’</p>	

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				<p>Is there financial gain for WFDC from Government or other sources to release and trade Green Belt land in order to supply an unknown quantity of dwellings to satisfy an unknown greater than 'local' need?</p> <p>It would seem that the Council have been misinformed by the independent Amion Report and a further review of housing need, at a clearly reduced level of need is imperative, to minimise loss of Green Belt, and provide a robust analysis of housing need.</p> <p>It would appear also that central government require that 'Planning Authorities are required to demonstrate a 5 year land supply for the delivery of housing'. Why therefore is there a need for a 15 year defined supply? Compare Bromsgrove Local Plan timescales.</p> <p>Is therefore the OAHN a report designed to provide an estimated forecast of Wyre Forest District local needs and inform the Wyre Forest Draft Local Plan or has the interpretation of the term 'Local' come to have an entirely different meaning?</p> <p>In conclusion, the OAHN Report is not fit for purpose, is flawed and not objective. It requires further scrutiny and revisiting.</p>	
	<a href="#">LPPO3941</a>	1.22 HELAA	Object	The Wyre Forest Strategic Housing and Economic Land Availability Assessment, 2016 identifies all sites regardless of the amount of development need to provide an audit of available plan.	The HELAA is a technical study which demonstrates the locations and potential capacity of available development sites. In terms of Green Belt sites listed, these reflect (in the

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				<p>Table J Green Belt Greenfield sites deliverable beyond 5 years and further tables report non deliverable sites beyond 5 years.</p> <p>No reference is made to this data in the Draft Local Plan, or during discussions at ‘drop ins’. There has been insufficient information to provide residents with an audit trail of supporting documents, in order to inform their consideration of preferred options.</p> <p>If the availability of sites is totalled, as referenced in the HELAA, several scenarios can be considered. If the actual need were less than 3697, no Green Belt land would be required.</p> <p>If the OAHN is accurate, then the requirement is calculated at 284 dwelling per annum. The report then rounds up this number to 300 dwellings per year.</p> <p><i>This simple unjustified action requires the building of 240 dwelling over a period of 15 years. It would appear that a section of Green Belt could be used for housing purely as a result of ‘rounding’ exercise.</i></p> <p>The OAHN Report suggests an annual dwelling requirement of between 199 and 291 (Table 3.2) with further flexing there is partial return to 2008 Headship rates giving 239-332 (Table 3.4) 199 is derived from the Office for National Statistics Sub National Populations</p>	<p>main) those pieces of land that have been put forward by landowners. The sites listed in Table J are Greenfield sites in the Green Belt which could only be released for development if taken out of the Green Belt via the Local Plan process. The totals given for each category of HELAA site are estimates (other than those sites with permission in place) and there is no guarantee that all these sites could come forward for residential uses. In fact, the status of a number of sites listed has changed and an updated HELAA document will be available alongside the draft submission. This will also include additional sites submitted at Preferred Options consultation.</p> <p>The HELAA is just one of a number of pieces of technical work used to select sites to go into the final submission document. A site selection paper will be submitted alongside the final document which will explain how the many different factors were weighed up in order to come up with a final list of sites.</p> <p>The OAHN is being refreshed using the</p>

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				<p>Projections (SNPP) 2014.</p> <p>Our population is acknowledged as ‘static’. In the Draft Local Plan Section 6A, 300 dwellings is assumed, but if we take PG Short Term data which indicates a population increase of 5.8%, this equates to more than double the rate in recent times and requires only 229 dwellings per year, 1278 less than figures suggest. There would therefore be no need to sacrifice the Green Belt to the rear of Spennells.</p> <p>Section 4.16 indicates that due to ageing population, economic activity and employment are projected to decline.</p> <p>Cambridge Econometrics suggest an increase in jobs of 76 per year. Oxford Economics suggest increase in jobs of 2 per year.                      Experian suggest -61 per year.</p> <p><i>The above, seemingly inconsistent findings would suggest they do nothing to inform the process and should be discounted.</i></p> <p>It would appear that, even if we assume population growth figures equating to more than double, when compared with trends from 2001-2015, we do not need to consider the use of the Green Belt land, with particular reference to the fields at the rear of Spennells. By assuming this growth level and in reducing the vacant dwelling % to current levels, there would be a need for</p>	<p>Standardised Methodology and the latest population data.</p>

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				<p>3243 dwellings over the period, which would equate to 180 per year.</p> <p>It is my view that, after careful consideration of information sources available, that WFDC should undertake a comprehensive review of the Draft Local Plan. There are inconsistencies within the OAHN, which if accepted without challenge, could result in discriminatory sacrifice of our of Green Belt areas of the district.</p> <p>Whilst I strongly object to Option A, I believe no presently offered options should be considered or pursued, until further scrutiny and review of housing development need is conducted.</p>	
	<a href="#">LPPO4144</a>	1.22 Issues and Options Responses	Object	<p>Regarding the LPR Issues and Consultation Paper – Responses September 2015 which informed the Draft Local Plan, little was made of this important consultation paper in the Draft Local Plan. Indeed the only reference to it was Under Section 6 – Summary of Issues and Options Responses there is just one point. This does not represent the weight of objections to Option 3 (now Option A): ‘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’.</p> <p>In the opening comments 7 out of 18 were from building</p>	<p>Objection and comments are noted. The consultation responses from the Issues and Options consultation undertaken in 2015 have been used by the Local Authority to inform the emerging Local Plan. The results of the Issues and Options consultation responses were made available on the Council's website during the Preferred Options consultation. However, your comments are noted and it is helpful to have feedback on our consultations so we can make improvements for future consultation events.</p>

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				<p>contractors (39%). Only 4 were made by members of public (22%) and comments about difficulty in ordinary people accessing the consultation were made– WFDC comment about leaflet drops. All other questions at least 20% comments are from builders.</p> <p>For Option 1 – all in support of brownfield regeneration</p> <p>For Option 3. Brownfield regeneration focussed on the main towns and expansion of Kidderminster to the south-east via a sustainable urban extension. There were 21 responses, 15 objected and 2 commented negatively – 81%.</p> <p>Question 14 is leading and an example of a leaning towards the WFDC own preferences: Do you think a Sustainable Urban Extension to the south east of Kidderminster is the most sustainable location for greenfield development? If so, do you have any views or suggestions on appropriate development sites in this area?</p> <p>Regarding the actual Draft Local Plan, the “on-line survey of key stakeholders” and interviews with estate and lettings agents, the space in the document allocated to this gives the impression that it was a substantive piece of work, whereas it was not. The survey population is not numerically defined, so a response rate cannot be determined and so the value of the exercise and the representativeness of the answers is limited.</p>	<p>In terms of the various options considered at the Issues and Options stage, the Sustainability Appraisal Report and the Site Selection Paper consider these options in detail and explain why some options were taken forward and others were not in the plan making process.</p>

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				Given “25 individuals replied” and confusingly “16 responded to the survey questions” - and anything less than 30 is a ‘small number’ statistically - it is hard to justify the author’s view that it represents “an invaluable view on the current housing market and related issues in Wyre Forest”. This is compounded by 4 interviews conducted with local estate and letting agents. Whilst qualitative information is of value in support of a quantitative survey, the quality of the work on both fronts is so flawed as to render the findings meaningless.	
	<a href="#">LPPO4872</a>	1.22 Green Belt Review	Object	I challenge the validity of the Green Belt Review and the consequences this has, in respect of Option A for the fields between Spennells and Summerfield. These fields have a massive impact upon social amenity, biodiversity and the integrity and identity of the hamlets of Summerfield and Stone	Objection noted.
	<a href="#">LPPO495</a>	1.24	Object	I don't believe that this plan will work. Not sure where the economic growth will come from? Some of the units on Worcester Road that were built a few years ago are still empty. We are in a downturn. The only people that will benefit the development of Green Belt are the developers not people on the housing waiting list.	Objection is noted.
	<a href="#">LPPO3720</a>	1.24	Object	The previous plans from the Council have not achieved sustainable economic growth and this one is no different. It contains unrealistic thinking, takes no account of Brexit with the risk of slowdown in investment together with other wider impacts and risks. There has been no sensitivity analysis conducted to	Objection is noted. A number of evidence base studies have informed the emerging Local Plan, these include the Objectively Assessed Housing Need Study, and the Employment Land Review.

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				determine how sensitive each economic factor is to wider impacts to gather a risk appraisal of setting up a grossed up scale of development that will turn out to be damaging to the towns.	
Land Research & Planning Associates Ltd	<a href="#">LPPO537</a>	1.24	Object	<p>Not in terms of proper consideration of adequate or sufficient land for affordable homes. The only way to address this is to release more land around the rural settlements to ensure economic growth is sustained in those areas.</p> <p>Our clients have land at Far Forest that would accommodate this.</p>	Objection is noted.
	<a href="#">LPPO396</a>	1.24	Comment	<p>The plan fails to recognise changes in shopping habits - in particular the failure to 'tidy up' following the migration of Kidderminster town centre to Weavers Wharf and Crossley Retail Park.</p> <p>Many retail premises left behind have been empty for 8 /9 years - half the life of the proposed new plan!</p> <p>There is a need for fresh thinking that enables Kidderminster to become a modern, contained and attractive town centre that incorporates retail leisure and residential opportunities rather than pursue outdated models from the past - 'mixed use' communicates little other than the elements of 'wishful thinking' so often reported in the local press.</p>	Comments noted.
Land Research &	<a href="#">LPPO534</a>	1.25	Comment	Noted. The present Local Plan is becoming increasingly	Comment is noted.



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Planning Associates Ltd				out of date in terms of housing requirement (5 HLS) because it does not encourage or provide sufficient land to accommodate affordable homes.	
	<a href="#">LPPO157</a>	Whole document	Object	I did not receive official notification of this development planning process, I am not the only one, and the consultation process as it stands is fatally flawed. I received a notification from another local resident who said there was a development planning consultation in process. I suggest that the whole of the notification process be reviewed and the consultation should be re-run when correct open and transparent notifications have taken place.	<p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14<sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. The drop-in sessions were all very well attended. Leaflets advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event was approved by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet.</p>

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					We will however take your comments on board and will consider these issues next time we undertake a consultation event.
	<a href="#">LPPO2310</a>	Preferred Options	Object	<p>My objection is in letter form as your response form is not fit for purpose!</p> <p>A flawed plan with so many inaccuracies and heavily weighted in one direction (totally unfair).</p>	Objection is noted.
	<a href="#">LPPO566</a>	Various	Comment	<p>I accept additional dwellings have to be built however:-</p> <ol style="list-style-type: none"> <li>1. I understand there is sufficient land already 'available' to satisfy the building needs for the next 10 years, I suggest this stock be exhausted before any additional land be released from the Green Belt. Green Belt land will be easier, cheaper, more profitable for developers thus will be developed before the existing stock of available land.</li> <li>2. Any affordable dwellings should be reserved for people with connections to the district, i.e. currently live in the district, have close family ties, work in the district etc.</li> <li>3. A plan that just concentrates on the dwellings is unacceptable. I realise the district council does not have responsibility for roads, schools etc. but plan does not include COMMITMENTS to how the impact on these services is to be met</li> <li>4. Possibility of an eastern relief road has been mentioned, do not use this as a carrot to</li> </ol>	<p>Comments are noted. Infrastructure providers have been consulted in the Local Plan process. Details of the infrastructure requirements for the Local Plan can be found in the Infrastructure Delivery Plan (IDP).</p> <p>Worcestershire County Council, the highways authority, has also been consulted and they are preparing a Transport Modelling evidence base study. This will inform the site selection process and will help to evidence what highways improvements will be required, and whether an eastern relief road is necessary.</p>

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				<p>persuade people to accept the plans only to conveniently forget it in the future, as has happened in the past. I understand the county council has done virtually no work on this proposal therefore it should not be included unless it is a strong PROBABILITY of it happening.</p> <p>5. With regards to the areas of Green Belt to be released, especially the rear of Baldwin Road and to the eastern fringes of Comberton, Offmore and possibly round to the A449, this will be a relatively narrow development with no heart to the development and will therefore place an unrealistic load existing overstretched primary schools, doctors surgeries etc. I can understand the benefits of building to the eastern side of Kidderminster to attract commuters from Birmingham and Wolverhampton. A more centralised development would justify a new primary school, doctors, and have less impact on the surrounding people. The obvious place is Lea Castle.</p> <p>6. Any plan must specify how people are to travel from the new dwellings to the various places they need to visit and their place of work. Not just how they get in and out of the development.</p>	

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	<a href="#">LPPO178</a>	Foreword	Comment	<p>Before any future new developments are ever considered, important factors must be resolved now.</p> <p>Hospital care will only increase with an increased population, plus other health provision i.e. doctors surgeries etc. How will hospitals cope?</p> <p>Education provision should be firmly planned for now, not left for a future thought.</p> <p>All on going sites that have been left and not developed should be finished before any green fields are even touched e.g. Sion Hill School, Yew Tree Pub, Broadwaters and Lee Castle Hospital. Sion Hill feeling that the developer hopes he can use Green Belt behind the school.</p> <p>The centre of Kidderminster is a disgrace, now is time have a complete rethink. Many empty retail premises will never ever change back. The area should be developed for both residential and commercial use bringing life back into a dying town, making it a young vibrant area.</p> <p>All roads and transport infrastructure must clearly defined and planned for before any future development go ahead.</p>	<p>Comments are noted.</p> <p>Worcestershire ACUTE NHS trust has been consulted as part of this planning consultation. Any future infrastructure needs for the hospitals will be identified by them as the provider. Policy 12 enables future infrastructure needs to be met.</p> <p>Worcestershire County Council as a statutory consultant has provided evidence on all school place requirements.</p> <p>A number of the sites referred to have been proposed as site allocations, i.e. Sion Hill, Lea Castle former hospital site.</p> <p>In terms of roads and transport infrastructure, we have consulted with the infrastructure providers as part of the Local Plan process to identify their infrastructure requirements. This is evidenced in the Transport modelling work and also the Infrastructure Delivery Plan (IDP).</p>
Shrawley Parish	<a href="#">LPPO1418</a>	Foreword	Comment	WFDC consulted Malvern Hills District Council (MHDC) It	Comment is noted.

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Council				is extremely disappointed that MHDC has not cascaded this down to those villages, such as Shrawley, which have a specific interest in some of the proposals. This remains a concern.	
	<a href="#">LPPO331</a>	AKR/15 and AKR/14	Object	<p>Saddened to see the above fields suggested for development. The views are superb &amp; used by walkers to relax from the hustle &amp; bustle and enjoy the fauna/flora. Dunley Road is already becoming increasingly congested, on Friday mornings especially with the car boot, traffic comes to a standstill as it enters Bridge Street. I fear another high air dioxin area being created. I have witnessed the floods on the fields of Pearl Lane, a known flooding black spot, which is bound to be increased with more housing and hard surfacing. The view from Areley Kings church conservation area will also be worsened if housing sprawl is allowed to encroach along the Ribbesford Road into grade 3 agricultural land.</p> <p>Please make more use of un-kept and run down premises in Kidderminster and Stourport town centres. In Areley Kings the Squirrel Inn, Areley Common, is abandoned as is the former sports centre. Areas around the Tesco Store in Stourport town centre are still unused. The former Parson Chain premises and the "shopping mall" in Bridge Street are not being used. In Kidderminster, there are endless opportunities all along Worcester Street &amp; with the former sugar beet premises and lea castle sites the area is blessed with so many</p>	<p>Objection is noted. The emerging Local Plan has considered the brownfield sites available for development in the District. Evidence of this can be found in the HELAA document and also the Brownfield Land Register. Unfortunately, we do not have enough available and deliverable brownfield land to accommodate all of our development needs.</p> <p>A number of these sites mentioned are already being considered as possible allocation sites, i.e. Parsons chain site, Bridge Street Basins, Lea Castle, and the remaining sites in the former sugar beet premises.</p>

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				brown field sites. Please retain the fields for future generations to enjoy.	
	<a href="#">LPPO267</a>	Detailed response	Object	Why build on the Green Belt. There is plenty of 'Brown' land to use i.e. the old power station site in Stourport and the ex British Sugar corp. site in Kidderminster. Indeed there many sites in KR which have derelict and unused buildings which could be used.	Objection is noted. The emerging Local Plan has considered the brownfield sites available for development in the District. Evidence of this can be found in the HELAA document and also the Brownfield Land Register. Unfortunately, we do not have enough available and deliverable brownfield land to accommodate all of our development needs.
	<a href="#">LPPO460</a>	Potential site for travelling showpeople Habberley Rd	Object	<p>I object to the potential use of the site at Habberley Rd, Bewdley on following grounds:</p> <p>I don't consider that the site satisfies the criteria of the council's policy as the requirement is not an exceptional circumstance, it is not suitable for storage and would harm the appearance of the area. An earlier attempt to include an adjacent site was dismissed at an early stage a few years ago on the grounds of Highways concerns re large vehicles accessing the site in an accident black spot close to the Mercure Hotel.</p> <p>The site is currently in a good state and in current use and being close to the afore mentioned hotel and Pines Golf Club could impact on tourism.</p>	Objection and comments noted.

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				<p>There are potential environmental issues - planning permission on adjacent sites have been refused on grounds of proximity of potential bronze age burial mound and encroachment on area separating Kidderminster/Bewdley.</p> <p>Use could not be restricted to one user.</p> <p>Other proposed sites are more suitable.</p>	
	<a href="#">LPPO517</a>	Appendix A	Object	<p><b>Objection to Use of Green Belt land for housing developments to the of rear Baldwin Road &amp; Spennells Fields, REFERENCE NUMBERS: OC/4, OC/5, OC/6, OC/13, Hurcott BW/4, WFR/ST/2 &amp; AS/10</b></p> <p>PRECIS</p> <p>Object to the use of Green Belt land for housing development to the rear of Baldwin Road and Spennells fields etc. This would irrevocably destroy the appeal and beauty of the area and bring with it added health, pollution and social problems.</p> <p>Alternative brown field sites are available along with pockets of derelict land ripe for redevelopment.</p> <p>The amount of development required has been vastly overestimated, the actual amount needed could be sustained on alternative brown sites (Lea Castle, disused pubs, disused factories such as those in Park Lane,</p>	<p>Objection and comments are noted. The Objectively Assessed Housing Needs Study will be updated using the Government’s new standardised methodology for calculating housing need. The latest population and household projections will also be used.</p> <p>The Preferred Options consulted on a number of site options. The Pre-Submission Local Plan will identify the Council’s final proposed list of site allocations. These will then be considered by the Planning Inspector during the examination of the Local Plan.</p>

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				<p>Sladen/Sion Hill schools).</p> <p>POPULATION</p> <p>For Kidderminster &amp; Stourport the Local Plan seeks to bring in population from outside areas. Such a population would no doubt work outside the area adding to traffic pollution. New affordable houses should be earmarked for local people trying to get on the property ladder.</p> <p>Restrictions should apply so the intended “local people” actually become the purchasers as opposed to those not intended for when built. Instead we predict the bulk of development will be 4/5 bedroom houses with tiny gardens, ignoring what local people want. These developments provide little green space for community wellbeing and habitats for nature. Conversely, Bewdley, Chaddesley &amp; other villages are required to provide "housing to meet local needs." Why the difference?</p> <p>We question the need for 300 houses p.a. which is based on a growth rate of 7.7% &amp; not the actual 2.7% (2001-15) which is way below the national average used to arrive at the large figure required. The true figures based on Kidderminster's census figures could easily be accommodated in brown sites like Lea Castle.</p> <p>These growth rates figures are based on assumptions prior to the Brexit vote which will impact reducing the</p>	



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				<p>migration of European people to this county that would have had a housing requirement. The predicted growth rates are fundamentally flawed in many ways meaning the migration to this area will be greatly reduced therefore the growth rates cannot be used to predict the requirements for housing growth required in the WFDC area.</p> <p>POLLUTION</p> <p>Development of these areas would substantially increase the already heavy traffic pollution. We have seen a steady increase in an unacceptable level of traffic (including a lot of very large commercial vehicles) on these residential roads to avoid the lights at Birmingham Road. We have monitored the traffic and the amount of use is large and mainly by non residents travelling to the West Midlands! Also the speed of this traffic is seriously dangerous, especially to children, the vulnerable and animals. This development would further impact on air quality and is contrary to National Planning Policy Framework especially para. 109-124. Add to this an increase in the already incessant traffic noise levels.</p> <p>The proposed development to the rear of Baldwin Road infers that Hurcott Lane will require the road to be blocked for vehicle access at either the Birmingham Road or Stourbridge Road ends but this will not prevent traffic flow just divert more traffic into Hurcott Road increasing pollution and volumes of traffic on roads only</p>	

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				<p>designed for local residential traffic which have inadequate flow characteristics.</p> <p>This is not a healthy and community spirited decision to develop the area and increase traffic on our already overused residential roads which are being used akin to A roads. Baldwin Road is similarly treated like a rat run and as for the Horsefair how much more can this bottle neck sustain? We are trying to improve the look of this run down area not destroy it and end all hope of engendering a happy community spirit. Extra housing would require a by-pass to be built as the aforementioned roads just cannot sustain more traffic and the pollution it brings.</p> <p>WILDLIFE</p> <p>The area is known and loved for its beauty and wildlife. It is treasured by local folk and visitors. Green Belt plays an aesthetic role in separating the town from the West Midlands conurbation and these green fields are the first introduction to Kidderminster on the A451 and A456. Do not bulldoze this asset as safeguarding the district's Green Belt preserves its attractiveness to both locals and visitors. Consider the importance of recreational activities in terms of health, wellbeing and tourism. People need space to thrive but its unlikely developers would provide sufficient open spaces or parks as there's no money in it! Compared with neighbouring towns like Stourbridge we are lucky to</p>	

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				<p>have such big green spaces. Don't destroy it for future generations when alternative brown or derelict sites are available.</p> <p>Endangered species and wildlife in general would be threatened. In our garden we have seen bats, newts, badgers, a heron and dragonflies. Development would seriously impact and cause irrecoverable change to wildlife habitats especially on buffer zones for Hurcott and Podmore SSIs.</p> <p>Some proposed development sites have steep gradients which could raise the risk of potential flooding. The proposed development behind Baldwin Road has the potential to flood, on one side with run off towards the Birmingham Road with a natural hollow in the main road and on the other side run off towards the lower end of Hurcott Road where it is a narrow lane which in turn would run off into the outfall from Hurcott Pool and transfer to Broadwaters with the potential for flooding the adjacent main road.</p> <p>Land to the rear of Offmore and Baldwin Road is generally much higher than the rest of the area so any development would be very visible and not blend in spoiling the beauty of the area. The field height to the rear of Baldwin Road means that the proposed properties would adversely overlook the existing properties &amp; their gardens at the lower end of Baldwin</p>	

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				<p>Road.</p> <p>The Government's own policy regarding planning decisions is to prevent harm to biodiversity and geological interests. In brief all planning decisions must consider location on alternative sites to green fields.</p> <p>AMENITIES and COMMUNITY SPIRIT</p> <p>We suffer from a lack of amenities in this area. One shop in which our post office was taken off us. A smattering of shops in Spennells and Offmore. Can local schools accommodate extra housing on this level? Offmore is already full and can't be developed. We no longer have an acute hospital so all this extra population would place more pressure on Worcester Royal already facing special measures. This also raises questions with regards the existing level of doctors, dentists and opticians in the area. Public transport is poor and infrequent.</p> <p>Big developments generally have no community spirit. Building on smaller pockets of land fosters integration. Large sprawling estates increase social isolation, antisocial behaviour and crime rates as acknowledged by the WFIDP. Doubling the size of Spennells would not be a wise move.</p> <p>CONCLUSION</p> <p>We need smaller numbers of houses proposed which</p>	

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				<p>can be sustained by brown sites like Lea Castle. Smaller pockets of once used land should be considered like factories on Park Lane, closed pubs (The Broadwaters?) closed schools like Sladen and Sion Hill.</p> <p>We need to reinvigorate existing eyesores such as disused schools &amp; factories which are frequently vandalised and this will improve some of the more rundown areas rather than permanently erode Green Belt sites, which once gone they are gone forever.</p> <p>Don't bulldoze Green Field sites prior to using up every brown field or derelict site in the locality.</p>	
	<a href="#">LPPO634</a>	Foreword	Object	You state that the Council believes that it is very important that everyone responds to this consultation	Objection is noted.
CORE11	<a href="#">LPPO135</a>	Foreword	Support	Support for Foreword.	Support is noted.

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 2: KEY ISSUES AND CHALLENGES**

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
	<a href="#">LPPO345</a>	2.1	Comment	If we extend planned developments to our Green Belt areas, you are going against what you have said in this paragraph and not continuing to make the most of brownfield regeneration; an example of this is Westhead, which I can find no mention of any plans for.	Previous policy has concentrated development on brownfield land, however, much of the brownfield land has now been developed. The policy of the Council is for the development of brownfield sites however, the amount of housing required within Wyre Forest District is much greater than the availability of brownfield land. Therefore greenfield sites and Green Belt land needs to be considered.
	<a href="#">LPPO397</a>	2.1	Comment	Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collectively review overall brownfield site availability and plan housing development accordingly.  Artificial borders should not apply when making decisions to destroy the Green Belt.	The authorities are all separate authorities who are at different stages in the local plan process. Wyre Forest District has its own housing market which is separate from the other authorities housing market areas.  In Wyre Forest District there has been an assessment of brownfield sites and there is a brownfield land register.
	<a href="#">LPPO420</a>	2.1	Comment	Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collectively review overall brown field site availability and plan housing development accordingly.  Artificial borders should not apply when making decisions to destroy the Green Belt.	The authorities are all separate authorities who are at different stages in the local plan process. Wyre Forest District has its own housing market which is separate from the other authorities housing market areas.  In Wyre Forest District there has been an assessment of brownfield sites and there is a brownfield land register.
	<a href="#">LPPO346</a>	2.2	Comment	The relatively static population would suggest	The Local Authority has evolved their strategy

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>that plans for large scale developments are not merited under those statistics.</p> <p>We recognise however that small scale developments are needed.</p>	<p>for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p> <p>[1] ONS 2016-based Subnational Population Projections</p>
	<a href="#">LPPO472</a>	2.2	Comment	<p>The population of Wyre Forest has risen by around 1,200 since 2001, representing an increase of around 1.2% and by about 100 persons since mid-2011.</p> <p><a href="http://www.worcestershire.gov.uk/info/20044/research_and_feedback/795/population_statistics/8">http://www.worcestershire.gov.uk/info/20044/research_and_feedback/795/population_statistics/8</a></p> <p>Accordingly I do not see the need to increase the dwellings by 300 p.a.</p>	<p>The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p>

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					[1] ONS 2016-based Subnational Population Projections
Kidderminster Civic Society	<a href="#">LPP01165</a>	2.2	Comment	We note that the population of Wyre Forest has been almost static for some time. In making our comments we rely on the accuracy of your figures for the number of houses required by the government to be built in Wyre Forest up to 2034 and your forecast for the district.	<p>The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p> <p>[1] ONS 2016-based Subnational Population Projections</p>
	<a href="#">LPP04047</a>	2.2	Comment	<i>Page 12, Para 4.2 “However, after a decade with a population increase of only 1. 1% (2001-201 1), the population increased by a further 1. 1% from 2013 to 2015” — It is assumed the 2001-1 1 figure is derived from the census report — where is the evidence for the 2013 to 2015 figure?</i>	Population between the census years are based on Office for National Statistics (ONS) Population estimates.
	<a href="#">LPP0159</a>	Population	Object	With Wyre Forest losing more jobs than it is gaining, there is no need to build on Greenfield sites. Central areas of Kidderminster can be	There is a requirement for additional dwellings within the district as identified in the Objectively



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				built on to accommodate any increase in population. More housing could be built at Blakedown to ease pressure on the main roads.	Assessed Housing Need (OAHN) 2016.  The whole District has been looked at to consider where development should be situated.  Policy 22A has been amended so that where appropriate, other uses such as residential, recreation, employment and leisure will be supported to bring vitality into the town centre of Kidderminster as retail patterns have changed.
Historic England	<a href="#">LPPO1261</a>	Settlement hierarchy	Support	Supportive of the varied comments relating to the historic environment throughout the document and the description of what is locally distinctive about the different settlements in Wyre Forest	Support for the Settlement Hierarchy is noted.
	<a href="#">LPPO347</a>	2.3	Comment	It should be noted that community identity is even stronger within villages, especially Cookley, and therefore should be preserved and not merged and attached to Kidderminster.	Agree that community identity can be strong in smaller communities.
	<a href="#">LPPO434</a>	2.2	Comment	What percentage increase of the current WF population has been calculated/ assumed for the period of the new plan?  Does the number of new proposed houses reflect the calculated/ assumed increase in WF	An Objectively Assessed Housing Need (OAHN) to assess the number of dwellings required was carried out in 2016 and updated in 2018.  The population of Wyre Forest District increased by 1.1% from 2013 to 2015, and a further 1.1%

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				<p>population?</p> <p>If there is a difference in these numbers, what does this difference represent?</p>	<p>between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036<sup>[1]</sup>.</p> <p><sup>[1]</sup> ONS 2016-based Subnational Population Projections</p>
	<a href="#">LPP03669</a>	2.3	Object	<p>2.3 The character, community identity and distinctiveness you refer to in the plan, will be lost as Kidderminster becomes a soulless commuter town. You have not shown any evidence as to how these additional residents will contribute to the growth and of Kidderminster as they will continue to shop and use facilities external to the town such as Merry Hill, Birmingham and beyond.</p> <p>Kidderminster is a market town with historic characteristics, links to the carpet industry, a rural outlook. You have not shown any evidence as to how these characteristics will be maintained and how the additional residents will add to the characteristics and distinctive nature of the town.</p>	Comments noted.
	<a href="#">LPP0473</a>	2.3	Support	Support for para 2.3	Support for paragraph 2.3 is noted.
	<a href="#">LPP0170</a>	2.6	Comment	As Bewdley attracts tourists, a coach park should be made available again.	Comments noted.

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	<a href="#">LPPO348</a>	Transport	Comment	I would disagree and say that Cookley does not have reasonable transport as this service is temporary and does not run after 6pm. The continuation of the existing bus service is vital to numerous residents who feel isolated due to lack of transport facilities. The continuation of a temporary bus service is vital to numerous residents who already feel isolated and cannot visit or go for a night out away from the village for fear of missing the last bus home.	Cookley is not as well served as Kidderminster in terms of bus services however it is much better served than the villages in the west of the district. Cookley is very well served in terms of facilities including retail.
Land Research & Planning Associates Ltd	<a href="#">LPPO539</a>	2.7	Comment	The reason that areas like Far Forest and similar rural settlements have fewer facilities is because the local plan structure of the past Local Plans has continued for over three decades containing each of these settlements with a tightly drawn settlement boundary or none at all. This has had an unhealthy constraint and discouraged growth so that young people can remain locally.  PPG001 has not been followed in this PO document. Rural settlements growth should be encouraged. This document particularly Option A does not deal with this.	Comments noted.
	<a href="#">LPPO2410</a>	2.9	Object	Para 2.9 notes the poor air quality at Welch Gate Bewdley, yet this apparently intractable and severe problem does not appear to have been considered in the Council's preferred options. Until, or if, the air quality is improved	Both the AQMA's and Green Belt are taken into consideration when assessing sites. A comprehensive Green Belt review has been carried out as part of the evidence base studies for the emerging Local Plan.

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				<p>to at least acceptable standards, there is no scope for increasing housing in Bewdley on the west of the river, as this will inevitably increase traffic (regardless of the nature of the housing) and hence exacerbate the poor air quality.</p> <p>This paragraph also notes the importance of protecting, conserving and, where it is possible to do so, enhancing the District's rich natural environment and historic assets. This does not appear to have been taken into account sufficiently in relation to proposed development of Green Belt. In my view, it is also important, for maintaining the distinctiveness of each of the two towns, to preserve the current area of Green Belt between Bewdley and Kidderminster.</p>	
	<a href="#">LPPO2934</a>	2.9	Object	<p>Policies of the Local Plan Review do not seem to require flexible design and layouts 'future proofing' development so as to take account of important population changes such as 'ageing' over the plan period.</p> <p>Although the LPR states (1.19) that Wyre Forest housing market 'constitutes a self contained Housing Market Area', considering the statistics at table 8.0.4 and 2.9 the social issues of</p> <ul style="list-style-type: none"> <li>• static population growth;</li> </ul>	<p>Design and layout of residential sites will form part of the planning application for a site.</p> <p>Comments noted.</p>

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				<ul style="list-style-type: none"> <li>• a very high proportion of resident aged 65+</li> <li>• the need to ensure that residential development caters for all groups in society’,</li> </ul> <p>It makes limited proposals for how this apparent lack of appropriate housing mix could be achieved (8.16, beyond bungalows for the 65+ age group). Higher quality homes and those that 65+ might be prepared to downsize to are not represented in any detailed way, although affordable housing is mentioned. Para 6.9 only refers to what ‘might’ happen, rather than what ‘will’ happen-seeking to address the management of supply in all its house-type range/ownership, via approved policies that follow through from the comments of 8.16. Where are adaptability for the future and building codes?</p>	
	<a href="#">LPPO3670</a>	2.9	Object	<p>2.9: How can you ensure that working age people will work in Kidderminster? You have shown no evidence of the employment for these people. Their employment will continue to lie outside of the area. How can you ensure that there will be the professional, manufacturing, employment needs required other than small retail outlets which will not be sufficient to grow the town as you suggest.</p> <p>The evidence you provide will not create</p>	<p>It is not possible to ensure that residents work in Kidderminster however by allocating land for employment purposes means job creation within the District which may encourage residents to work in the District.</p> <p>The 2016 Employment Land Review found that the majority of residents living in Wyre Forest District also work in the District.</p>

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				enough quality employment in the key areas to enhance the town as you suggest.	
	<a href="#">LPP0398</a>	2.9	Comment	<p>This section describes attempts to 'engineer' the make up of the population rather than address residents' needs.</p> <p>The focus needs to be on recreating the attractive Kidderminster town centre we once had - and thereby present Kidderminster to potential investors as a proactive and forward thinking authority rather than one in denial e.g. a council member recently describing Kidderminster as having a 'thriving' town centre when interviewed by Central News.</p> <p>The council would benefit from independent advice on how to regenerate to meet modern needs.</p>	<p>The Local Authority has considered alternative uses to retail in the town centre to enhance vitality.</p> <p>Policies consider alternative uses in the town centres. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation, employment and residential.</p>
Wyre Forest Friends of the Earth	<a href="#">LPP01306</a>	Public Transport	Comment	In the previous consultation the respondents' highlighted "Very poor public transport" Developing sustainable transport over the plan period will be difficult because of the current low levels of investment in public transport particularly the bus service.	Comments noted.
Wyre Forest Green Party	<a href="#">LPP01407</a>	2.10	Comment	The previous consultation highlighted respondents' issue with "Very poor public transport" Developing sustainable transport over the plan period will be difficult because of	Comments noted.

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				the current low levels of investment in public transport particularly the bus service.	
	<a href="#">LPPO2729</a>	2.10	Comment	Comment - Key Issues and Challenges - paragraph 2.10, page 16 - A lot of people will resist the development of Green Belt sites as long as there are brownfield sites which haven't been built on. A policy needs to be put into place that ensures that all brownfield sites have been built on prior to any construction on Green Belt land. Brownfield sites simply being 'earmarked' for construction is not enough since many sites have been earmarked for development for some time without much in the way of progress being made.	Wyre Forest District Council has to allocate greenfield or Green Belt sites as there are not enough brownfield sites left, however, it is not within the power of Wyre Forest District Council to make developers develop brownfield sites before greenfield.
	<a href="#">LPPO1756</a>	2.10	Object	<p>Objects to building on Green Belt. Concerned about traffic, pollution, impact on health, animal habitats and the natural environment.</p> <p>Concerned about being saturated with continual housing that has an impact on crime rates and house prices.</p> <p>Strongly objects to both Plan A and Plan B.</p>	<p>Wyre Forest District Council has to allocate land for development. If the Local Plan was not reviewed and the Council did not have a 5 year housing land supply developers could apply for planning permission anywhere in the District.</p> <p>The Local Authority has evolved their strategy for development based on evidence. This includes an Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal.</p> <p>The policy of the Council for many years has been to build on brownfield land but there is not</p>

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					enough left and so greenfield and Green Belt sites have to be considered.
	<a href="#">LPPO2726</a>	2.10	Object	Table 2.10 details that there are very poor public transport services and high traffic density. Therefore whichever option is provided, these need to be addressed, otherwise it is not local planning but letting local market demands drive developments.	2.10 are the comments received from respondents from the Issues and Options consultation.  Sites in the emerging Local Plan have been considered by the highways department at Worcestershire County Council.
	<a href="#">LPPO289</a>	2.10	Support	Support for para 2.10	Support for paragraph 2.10 is noted.
CORE11	<a href="#">LPPO149</a>	2-10	Support	Support for paragraph 2.10.	Support for paragraph 2.10 is noted.
	<a href="#">LPPO36</a>	Leisure facilities	Comment	If more people are to be encouraged to use the swimming pool and gym, why was it  a. Built in such an out of way place with no public transport facilities and  b. a small car park. The only way people can get there is to use their cars, and if the car park is full, the only option is to park on the road.  At least in the centre of town it was easily accessible to all people, including children who could walk or use public transport to get to it, but now they haven't any means to accessing it.	The position of the leisure centre is serviced by the Route 1 Kidderminster circular service, a half hourly service, from Kidderminster bus station. Passengers are able to flag down a bus immediately opposite the leisure centre.  The Council have sought planning permission for the car park at the leisure centre to be extended to increase the parking available to users of the leisure centre.
	<a href="#">LPPO2165</a>	Social and	Comment	The district council seems to be indicating that	Comment is noted.



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		Economic Issues		<p>in order for the area to prosper, we as a community need to encourage working age families to the area so that there is a better balanced 'Circle of Life' in the area.</p> <p>This makes sense. There does need to be room to allow younger generations to come through and make Wyre Forest an aspirational place for them to live.</p>	
Wyre Forest Green Party	<a href="#">LPP01406</a>	Table 2.0.1	Comment	The Horsefair Air Quality Management Area (AQMA) extends well beyond the Horsefair. It includes the Ringway to its junction with Coventry Street and includes Coventry Street to the junction with Radford Avenue. This is important when considering the impact of additional traffic.	Both proximity to the AQMA's and traffic impact are considerations that are taken into account when assessing sites.
	<a href="#">LPP0288</a>	Table 2.0.1	Comment	<p>Population age profile is not surprising given the lack of work and training opportunities. Opportunities need to be created to address this issue.</p> <p>Looking at the retail profile, Wyre Forest is seen as a low wage area and therefore one generally has to travel to other areas for better quality options.</p>	<p>The age profile shows that the District has an ageing population and fewer numbers of young people due to the lower birth rates.</p> <p>Wyre Forest District does have a lower wage area, employment land will be allocated through the Local Plan which may give more employment options within the District.</p>
	<a href="#">LPP0474</a>	Table 2.0.1	Comment	I wish to highlight the phrase "Virtually static population growth".	The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need

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					<p>(OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p> <p>[1] ONS 2016-based Subnational Population Projections</p>
	<a href="#">LPPO502</a>	2.9	Comment	<p>Why do we need 5400 houses built as the population is static? Older people do not want to move from their homes where they have lived in for many years. I work with older people and it becomes very important that people with memory loss stay as long as possible in familiar surroundings.</p> <p>As Weavers Wharf was developed the rest of the older town centre has started to die. New developments do not mean that the Town improves it just shifts the money from older established retail outlets to those that have a national feel and a tight marketing strategy behind them.</p>	<p>The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p> <p>The Local Authority has considered alternative uses to retail in the town centre to enhance</p>

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				<p>Once you allow the development of the Green Belt on the Eastern part of the town it will not suddenly give higher grades to students, lower body mass index of school children or raise wages. It will give developers more money, it will cause even greater transport problems as most people work outside of Kidderminster, And the Green Belt will be lost to all for ever. The environmental 'look' driving in to Kidderminster from Blakedown will be very different. Biodiversity will be reduced.</p>	<p>vitality.</p> <p>Policy 10B and Policy 22A consider alternative uses in the town centres. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation, employment and residential.</p>
<p>Worcestershire County Council, Planning Economy &amp; Performance</p>	<p><a href="#">LPP01075</a></p>	<p>Table 2.0.1 2.9</p>	<p>Comment</p>	<p>Table 2.0.1 in section 2.9 correctly highlights that population growth in Wyre Forest district is not going to be high over the next 20 years, and that a high proportion of residents are aged 65+.</p> <p>Between 2016 and 2026, there is likely to be a significant increase in people aged 75+. Due consideration therefore needs to be given to the needs of an ageing (and elderly) population and their needs particularly as people are not only living longer but are also living longer with poor health or complex health issues.</p>	<p>Comments noted.</p> <p>The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036<sup>[1]</sup>. There will be a marked increase in the number and proportion of older residents. The population aged 65+years is expected to increase by 28.1% from 24,200 in 2016 to 31,800 in 2036<sup>[2]</sup>.</p> <p>A major strategic challenge for the Council is to ensure a range of appropriate housing provision, adaptation and support for the District's older population. The number of people across the Wyre Forest aged 65 or over is projected to increase significantly during the Plan Period, from 24,200 in 2016 to 31,800 by 2036 (31.4%</p>

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					increase) The increase in the population aged 80 or over is considerable, rising from 5,900 to 11,200 persons during the period 2016-2036 (89.8% increase).  <a href="#">[1]</a> ONS 2016-based Subnational Population Projections  <a href="#">[2]</a> ONS 2016-based Subnational Population Projections
Historic England	<a href="#">LPP01262</a>	Table 2.0.1	Comment	Within the table relating to environmental issues we would recommend that 'historic assets' is amended to 'heritage assets' to comply with National Planning Policy Framework (NPPF) terminology.	This has been amended in line with the comments.
Wyre Forest Friends of the Earth	<a href="#">LPP01305</a>	Environmental Issues	Comment	The Horsefair AQMA extends well beyond the Horsefair. It includes the Ringway to its junction with Coventry Street and includes Coventry St to the junction with Radford Avenue. This is important when considering the impact of additional traffic.	Both proximity to the AQMA's and traffic impact are considerations that are taken into account when assessing sites.
	<a href="#">LPP0324</a>	2.0.1	Comment	No plan seems to account for social issues. We need parks and open space to encourage activity for all age groups.	Comments noted.
Land Research & Planning Associates Ltd	<a href="#">LPP0533</a>	2.8 - 2.9	Comment	There is a substantive area to the west of WFDC area that is not Green Belt that could accommodate some more housing around the	Comments will be considered.

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				<p>smaller settlements where landowners are willing to allow say at least 50% affordable homes or starter homes. This would accommodate a considerable amount of the shortfall and help sustainability to rural areas.</p> <p>PPG 001 states that Rural Settlements should be allowed development in order to remain alive and sustainable. This does not appear to be the case in this PO document either for OPTION A or B.</p>	
	<a href="#">LPPO350</a>	Aging population	Comment	<p>As you state, we have an aging population and these residents may need smaller affordable accommodation. Large scale developments could put them in danger of being priced out of the market and a low level supply of affordable rented accommodation.</p> <p>Therefore not catering for our communities needs.</p>	Wyre Forest District Council wants to ensure that developments have a range of size of dwellings to cater for communities including an ageing population. The Council also wants a range of affordable accommodation including affordable rented accommodation.
	<a href="#">LPPO354</a>	Table 2.0.1	Comment	If the population growth is 'virtually static', why the need for so much development?	<p>The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015,</p>

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					and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].  [1] ONS 2016-based Subnational Population Projections
Land Research & Planning Associates Ltd	<a href="#">LPP0540</a>	2.0.1	Comment	Needs thinking in how to ensure young persons are and can be accommodated in local rural areas/settlements. The opportunity exists to allow rural settlements away from the Green Belt to expand and thrive. We are now starting the age of the ELECTRIC CAR and transport or similar types of energy to promote this. Electric charging can now take place at home. The majority of the population use a motor car. The need of the use of the motor car meaning development is not sustainable is now outdated and is not good argument in respect of the lack of sustainability and fresh thinking on this is urgently needed.	There is a cost involved owning an electric vehicle or a petrol/diesel vehicle, many people cannot afford a car and are dependant on public transport so sustainability is relevant.
	<a href="#">LPP02935</a>	East of Kidderminster (S)	Comment	The LPRPO document states "Virtually static population growth", so why is the plan suggesting an extra 6000 plus houses?	An Objectively Assessed Housing Need (OAHN) to assess the number of dwellings required was carried out in 2016 and updated in 2018.  The population increased by 1.1% (2001-2011), however the population increased by a further 1.1% from 2013 to 2015, and a further 1.1%

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					<p>between 2015 and 2017.</p> <p>The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036<sup>[1]</sup>. There will be a marked increase in the number and proportion of older residents. The population aged 65+years is expected to increase by 28.1% from 24,200 in 2016 to 31,800 in 2036<sup>[2]</sup>.</p> <p>Agree that the elderly may want to downsize and this would free up larger family homes, however this does mean that some suitable accommodation for the elderly may need to be built.</p> <p><sup>[1]</sup> ONS 2016-based Subnational Population Projections</p> <p><sup>[2]</sup> ONS 2016-based Subnational Population Projections</p>
	<a href="#">LPPO2962</a>	Table 2.0.1	Comment	<p>Loss of recreational land/long-term air pollution will put further stress on the local healthcare system</p> <p>Building on large areas of the Green Belt will also increase the possibility of flash floods and drainage problems</p>	<p>The Local Authority seeks to protect Green Belt as much as possible, however, however additional development is required based on evidence which includes an Employment Land Review (ELR) 2016, updated 2018 and Objectively Assessed Housing Need (OAHN)</p>

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					<p>studies 2016, updated 2018.</p> <p>The location of Air Quality Monitoring Areas (AQMA's) are considered when possible sites are assessed.</p> <p>The emerging Local Plan seeks to ensure that residents can access open space by footpaths and cycle ways for their health, well being and fitness.</p>
	<a href="#">LPPO4048</a>	Table 2.0.1	Comment	<p>Page 14, Para 2.9 Table 2.0.1 <i>“Although population static, there has been a 9% increase in the number of households as the number of residents per unit of accommodation is falling”</i>. Over what period of time? What where is the evidence?</p>	<p>The information is from household projections (2012-based) which show that in Wyre Forest District, the number of households is predicted to grow by 9% 2012-2037.</p> <p>Over the same period, the average household size in Wyre Forest is projected to fall from 2.25 to 2.12. 2.32 to 2.18.</p>
	<a href="#">LPPO4171</a>	Table 2.0.1	Comment	<p>The WFDC Consultation Document states that the district has “virtually static ‘population growth’ and ‘. Has a low level of in-migration’ This is confirmation that there is no strong demand for the proposed quantity of new housing. This lack of demand is further confirmed by the fact that the average paid house price in Worcestershire is £244,562, whereas in Kidderminster it is only £201,124. The document later states that there is a</p>	<p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017.</p> <p>The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036<sup>[1]</sup>.</p>



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				growing population. As there is little or no natural growth, in my opinion, any sudden increase would have to be fuelled by in-migration from an undisclosed agreement with Birmingham to accept overspill.	<a href="#">[1]</a> ONS 2016-based Subnational Population Projections
	<a href="#">LPP04710</a>	2.0.1	Comment	<p><b>From Table 2.0.1 - Virtually Static Population Growth.</b></p> <p>This means that there is no need for large developments of housing to satisfy local need. Although conceding that some development may be needed to accommodate the 9% increase in the number of households due to the number of residents per unit of accommodation falling. However this would be nothing like on the scale that is envisaged. If large developments are constructed it is inevitable that the majority of the houses will be sold to people moving in from outside the area. These will most likely already have jobs outside the immediate local area in places such as Birmingham and Worcester. This will inevitably lead to more commuting, largely by car. There is, quite rightly, much concern at the moment about pollution and air quality a high proportion of which is from motor vehicles. Environmentally this is very bad. We should be encouraging people to live close to their places of work, where sustainable means</p>	<p>An Objectively Assessed Housing Need (OAHN) to assess the number of dwellings required was carried out in 2016 and updated in 2018.</p> <p>The population of Wyre Forest District increased by 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. It is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036<a href="#">[1]</a>.</p> <p>Changes in retail patterns have had a detrimental effect on Kidderminster town centre. The Local Authority has considered alternative uses to retail in the town centre to enhance vitality.</p> <p>Policy 10B and Policy 22A consider alternative uses in the town centres. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation, employment and residential</p>

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				<p>of transport such as walking, cycling and public transport can be encouraged.</p> <p>Kidderminster already suffers from acute congestion at peak time and this will add to that. Even those who commute by train are likely to drive to the station adding to local congestion and pollution.</p> <p><b>On Social Issues</b></p> <p>“High costs of providing healthcare for an ageing population with high obesity. Results in more medical intervention; for example, hospital stays or visits and visits to GPs.”</p> <p>Walking is one the most accessible forms of exercise and with high positive improvements to health. As stated earlier the Green Belt area between Spennells and Stanklyn Lane is a very valuable amenity area well used by walkers, the loss of this is hardly likely to help with the above.</p> <p>“Diversify the economy, create more skilled jobs to reduce out of District commuting and increase the retention of young educated residents.” This is a worthwhile aim but will take time, in the short to medium term the current plan is going to draw in people from</p>	<p><a href="#">[1]</a> ONS 2016-based Subnational Population Projections</p>

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				<p>outside the area currently in employment elsewhere increasing out of district commuting.</p> <p><b>Under Key Issues and Challenges Economic Issues for Wyre Forest it states</b></p> <p>“Other areas of the town centre which have been traditionally retail could change to other uses and the primary shopping area could be redefined.”</p> <p>Since the development of Weavers Walk the main retail centre has shifted and much of the old retail area is run down and underused. I would strongly support some of this having change of use from retail to either residential, or mixed use residential/commercial and the construction or adaption of existing buildings either completely or partially (above retail/commercial) outlets into flats. This could at least partially meet the 9% extra predicted local need. As this increase is due to the occupancy rate of existing accommodation falling much of this increase would be for couples or single people who would not need larger family homes. Many of these are likely to be older people who would appreciate being within walking distance of the amenities and facilities that a revitalised town centre could</p>	

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				provide.	
	<a href="#">LPPO2724</a>	Table 2.0.1	Object	<p>Table 2.01 highlights the social and economic issues affecting the district.</p> <p>Clearly the economic issues impact the social issues, and therefore these should be given priority when considering district planning. Therefore planning for businesses should be given paramount attention. West Midlands Safari Park and Severn Valley Railway being high profile businesses that can create inward migration that will cascade to the smaller local businesses. It is also paramount that strategic planning takes full advantage of HS2 investment, as if not fully planned and delivered initially there is no second chance. So high profile lobbying needs to be done now, so we don't miss out on this huge national investment.</p> <p>This is particularly relevant when the qualification levels at GCSE and above require improvement. This can only be done with commitment in the form of structure educational planning and resources provision.</p>	Social, economic and environmental issues are all linked so these three issues all need to be taken into consideration in the emerging Local Plan.
	<a href="#">LPPO1682</a>	Table 2.0.1	Object	<p>1. states “Virtually static population growth” which negates the need for a massive number of houses. Smaller numbers as identified by table 2.0.1 for</p>	The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need

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				affordable housing/downsizing can be met through Brownfield sites/town centre regeneration. This LPR is fatally flawed in its projection of 6000 new dwellings.	(OAHN) in 2016 and updated in 2018.  Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036.  [1] ONS 2016-based Subnational Population Projections
	<a href="#">LPPO1683</a>	Table 2.0.1	Object	All social, economic and environmental points raised in above table are reasons NOT to pursue the LPR. The extrapolations used to estimate number of new dwellings is flawed, being based on national figures NOT on actual local figures, as proved by the statement in table 2.0.1 “Virtually static population growth.”	The Local Authority has evolved their strategy for development based on evidence for Wyre Forest District. This includes an Employment Land Review (ELR) and Objectively Assessed Housing Need (OAHN) both in 2016 and updated in 2018 and supported by the Sustainability Appraisal.
	<a href="#">LPPO3377</a>	Option A	Object	<ul style="list-style-type: none"> <li>The population growth figures aren't accurate as they appear to have been rounded up.</li> </ul>	The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018.  Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015,

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					and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].  [1] ONS 2016-based Subnational Population Projections
	<a href="#">LPPO3411</a>	Option A	Object	<ul style="list-style-type: none"> <li>Projected population figures aren't realistic.</li> </ul>	<p>The Local Authority has evolved their strategy for development based on evidence. This includes an Objectively Assessed Housing Need (OAHN) in 2016 and updated in 2018.</p> <p>Between 2001 and 2011 the population in Wyre Forest District increased by 1.1%, the population increased by a further 1.1% from 2013 to 2015, and a further 1.1% between 2015 and 2017. The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036[1].</p> <p>[1] ONS 2016-based Subnational Population Projections</p>
Gemini Properties	<a href="#">LPPO1190</a>	Table 2.0.1	Support	Table highlights key considerations that need to be taken into account including ageing population, need to attract economically active people, need to diversify economic base and	Many key considerations are being taken into account in the plan making process which includes evidence base studies.

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				<p>retain younger people and improvements to shopping offer and improvements in Kidderminster town centre.</p> <p>This requires a flexible approach to development. Kidderminster town centre needs to provide a range of retail opportunities and supporting facilities such as restaurants and leisure uses. This will also broaden the economic base. It would also be appropriate to direct new care facilities or the elderly to the town centre. Flexible uses should be encouraged to sites within and surrounding the town centre. Para.14 of NPPF requires plans to be flexible and able to adapt to rapid change throughout the plan period.</p>	<p>The Local Authority has considered alternative uses to retail in the town centre to enhance vitality.</p> <p>Policies in the emerging Local Plan consider alternative uses in the town centres. Policy 22A - In secondary shopping areas, support will be given for change of use of retail units to alternative uses such as leisure, recreation, employment and residential.</p>

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CORE11	<a href="#">LPP0150</a>	3-1	Support	Support for paragraph 3.1.	Support is noted.
	<a href="#">LPP0435</a>	3.0.1. Para iii	Comment	<p>Kidderminster town centre has a large proportion of retail outlets that remain unoccupied and are not maintained - this has been the case for a number of years.</p> <p>Are there any plans to convert unused town centre retail or unoccupied property to housing use? If not, why not?</p>	Comments noted. The council works with Empty Property owners who want to bring properties back into use and would support conversion of units where it is appropriate to do so.
CORE11	<a href="#">LPP0151</a>	3-3	Support	Support for paragraph 3.3.	Support is noted.
Land Research & Planning Associates Ltd	<a href="#">LPP0544</a>	3.4	Comment	Insufficient land is proposed to satisfy the severe critical shortage of affordable homes.	Comments are noted. The OAHN Study published in April 2017 identified the housing need for Wyre Forest District for the plan period. This study informed the level of new housing development that would be required in the district, including affordable housing. The proposed site allocations presented in the Preferred Options document were informed by the evidence in the OAHN study. Since the Preferred Options consultation, the Government has published their new Standardised Methodology for calculating housing need. The OAHN study is therefore being revised and will use the Governments new Standardised Methodology. The final selection of site allocations in the emerging Local Plan will be based on this revised



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					OAHN study.
	<a href="#">LPPO2413</a>	3.4	Object	Para 3.4 makes clear that the plan should set out a clear economic vision and strategy for the area, which positively and proactively encourages sustainable economic growth. I cannot see such a vision and strategy reflected in the preferred options. And, again, recent developments have shown WFDC to be too ready to accept developments offering only poor quality, low paid employment while sacrificing other objectives. I cite again the planning approval for the water park on Green Belt at the Safari Park as an example here. The plan provides rhetoric of a limited ambition for the area, but fails to convince that even these modest aims would be likely to be achieved.	Comments are noted.
	<a href="#">LPPO436</a>	3.4 para d)	Comment	What is the percentage buffer to be incorporated into the 5 year housing plan by WFDC?  How have WFDC performed in the past?	The percentage buffer is set out in the NPPF, para 47 where it states that in order for LPAs to boost significantly the supply of housing LPAs should “identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to

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					<p>20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land."</p> <p>The Council's Five Year Housing Land Supply Report shows how Wyre Forest District has performed in the past. This report is published and available on the Council's Planning Policy web pages for viewing.</p>
	<a href="#">LPPO3724</a>	Paragraph 3.5	Object	<p>Previous plans produced by the Council have failed to deliver. The Council lacks the required skills to correctly and objectively formulate a workable plan that is practicable and takes full account of risks and impact to the 'idealised fictitious vision' it feels it has to be seen to be in pursuit.</p> <p>The passage refers to a singular Preferred Option which is at odds with the document's Foreword that considers two Preferred Options. This gives little confidence in the document produced by the Council as to what it is talking about.</p>	Comments are noted.
Wyre Forest Green Party	<a href="#">LPPO1408</a>	Table 3.0.1	Comment	The "Vision" section of this document states that by 2034 residents and businesses will rely increasingly on energy from locally generated renewable sources. This is quite an ambitious	Comments noted.

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				<p>target. In <b>contrast</b> this policy is very unambitious particularly the requirement for a minimum of only 10% of on-site renewable energy. The policy also states “unless it has been demonstrated that this would make development unviable”, so even the 10% target can be ignored</p> <p>How will “reduced levels of traffic congestion” (ix.) be achieved? We are sceptical of this without:</p> <ol style="list-style-type: none"> <li>1. Reversing the decline in bus services;</li> <li>2. Creating a network of safe and direct cycle routes;</li> <li>3. Investing in attractive and safe pedestrian routes.</li> </ol> <p>The plan to have a bus interchange at Kidderminster Rail Station seems to have been dropped. The latest plan publicised in the local newspapers has no area for buses.</p>	
Wyre Forest Green Party	<a href="#">LPP01469</a>	Vision	Comment	<p>“Residents and businesses rely increasingly on energy from locally generated renewable sources” (ii.) Other than small scale micro-generation such as domestic solar panels there is no evidence that there are any plans for renewable generation on a larger scale. A reduction in energy demand for domestic and commercial properties is vitally important. A</p>	Comments noted.

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				programme of insulating older properties and building energy efficient new homes would reduce fuel bills and bring energy demand to a level which could be substantially locally generated.	
Persimmon Homes Limited	<a href="#">LPPO1598</a>	Table 3.0.1	Comment	<p>The vision and objectives should relate to the local area and aim to meet the expectations of national policy and guidance. The NPPF is clear about boosting housing supply in Local Planning Authorities areas to ensure that areas can continue to grow in a sustainable way.</p> <p>Aim should be an aspirational but realistic vision of how the Council wish to promote sustainable growth in the District. First bullet point to “maintain their distinctive and separate identities.” could be more positively worded to allow for the idea that growth can occur in the District in a planned and sustainable way.</p> <p>Fifth objective states that Bewdley will remain a thriving market town which meets the local community need. The overall vision for Bewdley needs to be more positive towards growth of housing to attract the people that it needs.</p>	Comments are noted.
Taylor Wimpey West Midlands	<a href="#">LPPO1711</a>	Table 3.0.1	Comment	Vision broadly supported. The Vision envisages that new development is properly supported by the timely provision of suitable infrastructure. Taylor Wimpey recognises that the delivery of	Comments noted.

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				new infrastructure will be necessary to support new development to mitigate for needs arising from new residents and the opportunities that may exist for assisting in delivering strategic infrastructure projects that have a far wider benefit to businesses and residents within the District and could assist in addressing a number of the highlighted issues.	
	<a href="#">LPPO37</a>	2034	Comment	Nobody can tell how Wyre Forest will look in 2034. I have been here 36 years and have seen Kidderminster transformed from a well established, pleasant living area to a run down and derelict slum.	Local Plan documents always include a vision for the area that they are aiming to achieve by the end of the plan period. The NPPF in para 150 states: “Local Plans are the key to delivering sustainable development that reflects the vision and aspirations of local communities.” It should reflect a collective vision for the sustainable development of the area. It should be aspirational but also realistic.
	<a href="#">LPPO251</a>	question	Comment	Great vision! But will it happen?  Not if you carry on with your present methods i.e. compulsory purchase of an old established business (Lloyds Garage) then knock it down and do nothing with the land! Except turn it into the most expensive rubble car park in the midlands.  Do something about Buftons/the shopping mall on the north side of bridge street, this building has been empty for about 20 years, it looks an	The Lloyds Garage site that is referred to in this response is the proposed site allocation AKR/1 – Bridge Street Basins.  The Buftons site is in the HELAA document and has therefore been considered as part of the Local Plan Review process.

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				eye sore that and the rubble car park make a complete mockery of your so called plans for improvement to the area.	
	<a href="#">LPPO399</a>	3.1	Comment	This is nothing short of what I'd expect in 2017.	Comments are noted.
	<a href="#">LPPO421</a>	3.0.1	Comment	This is nothing short of what I'd expect in 2017	Comments are noted.
Land Research & Planning Associates Ltd	<a href="#">LPPO541</a>	3.0.1	Comment	<p><b>Part (i.)</b></p> <p>In respect of "The outlying villages have grown organically to meet their own needs"</p> <p>Unless settlement boundaries are expanded to facilitate further housing this will not happen. Where landowners are willing to provide land for up to 50% affordable homes and/or starter/self build homes to allow outlying villages to remain sustainable, and/or could incorporate further facilities such as a local shop/primary school or similar included then a Policy should be considered and adopted to allow such expansion.</p>	The emerging Local Plan has sought to identify possible sites for future housing allocations. Policy 18B also considers small scale residential developments on infill plots within the settlement boundaries of the three main towns and villages.
The Woodland Trust	<a href="#">LPPO531</a>	Vision	Comment	We welcome the reference to the importance of green infrastructure in the vision for Wyre Forest. We would like to see the importance of trees and woods, as an important component of green infrastructure, recognised in the vision. Trees, in a variety of locations (e.g. street trees,	Comments are noted. Trees and woodland have been recognised in our emerging policy on Green Infrastructure (i.e. Policy 11D and Policy 14).

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				trees in parks and housing areas and in woodland) can also make an important contribution to tackling climate change, both in absorbing carbon and in enabling adaptation to the impacts of climate change (e.g. by alleviating the urban heat island effect or by reducing surface water flooding, providing shade for farm animals etc)	
Horton Estates Ltd	<a href="#">LPPO842</a>	Vision	Comment	<p>Bullet point viii. within Table 3.0.1 relates to the economy. We consider that specific reference should also be made to the contribution that existing industrial estates in the rural area, such as Cursley Distribution Park, will make during the plan period to the District’s economy. We request that the final sentence be reworded as follows:                      “...they are supported by the rural economy including several existing and significant industrial estates where sustainable growth will have occurred, and sustainable tourism.”</p> <p>We also request an additional bullet point be added to refer to the effective reuse of PDL throughout the District in accordance with paras. 17 and 111 of the NPPF (where it is not of high environmental value). This would be supported by Objective 5 within Table 3.0.2:                      “Previously-developed land, which is not of high environmental value, will have been prioritised to meet development needs.”</p>	Comments are noted.

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North Worcestershire Water Management	<a href="#">LPPO900</a>	Section 3.1 Table 3.0.1	Comment	<p>Objective ii) in Table 3.01 needs rewriting as there is no programme of floodplain management as such and the impact of increased water efficiency upon the risk of flooding is questionable. This objective currently reads: "The risk of flooding is reduced due to a programme of floodplain management, increased water efficiency, softer landscaping and extensive use of SuDS in new developments."</p> <p>Suggested wording: "The risk of flooding is reduced due to flood management and the extensive use of SuDS both in new developments and retrospectively"</p> <p>OR</p> <p>"Water management forms an integral part of the planning and design of developments. This includes the mitigation of flood risk, water efficiency and widely used SuDS."</p>	Comments are noted.
Kidderminster Harriers Football Club	<a href="#">LPPO927</a>	Table 3.0.1	Comment	<p>The proposed 'Vision for the area' should also include stronger support for improved sports, academic and cultural facilities in the district.</p> <p>To support the NPPF (para. 7) requirement that the planning system performs a social role including supporting health, social and cultural well-being.</p>	Comments are noted.



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				<p>Add extra bullet; <u>Sport and recreational facilities are expanded in the district with their increased use, resulting in health and welfare benefits. This will include the improvement of existing facilities on land to be a centre for sporting excellence, south of Kidderminster for the relocated Kidderminster Harriers Football Club.</u></p>	
Chaddesley Corbett Parish Council	<a href="#">LPPO1033</a>	Table 3.0.1 / 3.0.2	Comment	<p><b>Vision for the economy and employment needs (tables 3.0.1 and 3.0.2)</b></p> <p>Realising this vision will need:</p> <ul style="list-style-type: none"> <li>• A strategy and policies that will attract and retain higher value employers</li> <li>• Provision of locations for employment that have easy and rapid connection to the regional transport infrastructure (motorways and inter-city rail)</li> </ul> <p>This argues for greater collaboration with neighbouring authorities that are closer to major transport infrastructure, rather than taking a purely parochial view.</p>	Noted and agreed. The Council continues to have Duty to Cooperate discussions with its neighbouring Local Authorities.
Place Partnership Ltd	<a href="#">LPPO1088</a>	Table 3.0.1	Comment	Place Partnership Limited (PPL) manages the combined estates of Warwickshire Police (WP), West Mercia Police (WMP), Hereford & Worcester Fire and Rescue Service (HWFRS),	Comments are noted and agreed.

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				<p>Worcestershire County Council, Worcester City Council and Redditch Borough Council.</p> <p>The following are joint representations on behalf of WP, WMP and HWFRS to the consultation document. They concern only those policies and paragraphs that directly relate to the concerns and service priorities of the three emergency services:</p> <p>Table 3.0.1 – What will Wyre Forest District be like in 2034?</p> <p>The three emergency services are supportive of the direct reference in paragraph (x) of Table 3.0.1 that by 2034 crime and disorder in the District remain low and local residents feel safer.</p> <p>This ensures the Local Plan’s consistency with paragraphs 58 and 69 of the National Planning Policy Framework (NPPF), which state that planning policies and decisions should create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.</p> <p>The reference in paragraph (x) also helps to ensure the alignment of Vision with the vision for Wyre Forest contained within the ‘Single Sustainable Community Strategy for</p>	

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				<p><i>Worcestershire, which similarly envisages a 'district which people want to live in and visit; where they feel free from the fear of crime...'</i></p> <p>Paragraph (x) also ensures consistency between the vision and the following paragraphs and policies in the Local Plan on this topic:</p> <ul style="list-style-type: none"> <li>• Paragraph 5.4 (b) (iv)</li> <li>• Policy 9 (5)</li> <li>• Paragraph 11.12</li> <li>• Policy 27A (xiii)</li> <li>• Policy 27c (C) (v)</li> <li>• Paragraph 27.21</li> </ul> <p>Overall, the reference in paragraph (x) ensures an effective and sound message in the Vision. This will promote community safety, crime prevention and the provision where necessary of the design measures and infrastructure necessary to ensure this.</p>	
National Farmers Union West Midlands Region	<a href="#">LPP01117</a>	Vision	Comment	We welcome the vision but we feel it ought to express more support for rural communities via the delivery of local housing and employment opportunities and also acknowledge the continued importance of agriculture to the economy.	Comments are noted.
Wyre Forest	<a href="#">LPP01307</a>	Vision	Comment	The "Vision" section of this document states that	Comments noted.

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Friends of the Earth				<p>by 2034 residents and businesses rely increasingly on energy from locally generated renewable sources. This is quite an ambitious target. In contrast this policy seems very unambitious particularly the requirement for a minimum of only 10% of on-site renewable energy. The policy also states “unless it has been demonstrated that this would make development unviable”, without stating who would decide that it was non-viable.</p> <p>ii. “Residents and businesses rely increasingly on energy from locally generated renewable sources” Other than small scale micro-generation such as domestic solar panels there is no evidence that there are any plans for renewable generation on a larger scale. A reduction in energy demand for domestic and commercial properties is vitally important. A programme of insulating older properties would reduce fuel bills and bring down energy demand to levels which could be locally generated.</p> <p>ix. How will “reduced levels of traffic congestion be achieved”? It is difficult to see how this will be achieved without</p> <ul style="list-style-type: none"> <li>a) Reversing the decline in bus services.</li> <li>b) Creating a network of safe and direct cycle routes.</li> <li>c) Investing in attractive and safe pedestrian</li> </ul>	

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>routes.</p> <p>The plan to have a bus interchange at Kidderminster Rail Station seems to have been dropped. The latest plan publicised in the local papers has no area for buses.</p>	
	<a href="#">LPPO2411</a>	Table 3.0.1	Object	<p>Table 3.0.1 lists an interesting set of descriptors for the district in 2034, but there is insufficient information on how the proposed developments would achieve these descriptors, even if all were desirable. This vision is further undermined by recent developments, such as the large KFC near to WFDC’s headquarters, which would seem to discourage, rather than enhance, the likelihood of reducing obesity, one of the increasingly negative features of the area.</p>	<p>There is further work to do on the emerging Local Plan, but the Vision is what the Plan as a whole is aiming to achieve by the end of the plan period. The policies within the Plan will help to achieve the vision.</p>
	<a href="#">LPPO3721</a>	Table 3.0.1 viii	Object	<p>Paragraph 3.1 table 3.0.1 part viii</p> <p>I object to the unrealistic vision for the South Kidderminster Enterprise Park to become ‘the main focus for employment’ The idea to ‘industrialise’ a traditional market town to compete with West Midlands is not based upon competitive advantage to which industrialists look for viability. Unless there is cheap land, cheap building, low business rates, low wages these aspects will not compensate for the costs of route to market for products from a town lacking connectivity to national transportation and</p>	<p>The Vision in viii states “The urban areas of Kidderminster and Stourport-on-Severn and the South Kidderminster Enterprise Park are the main focus for employment but they are supporting by the rural economy and sustainable tourism.” Therefore, the Vision is not just referring to ‘South Kidderminster Enterprise Park’. Employment development is an important element of making a place sustainable.</p>

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				communication infrastructure. These aspects will all needs to be addressed before investors are attracted to a viable business model. The Council is operating beyond practical attainment with occluded thinking. The focus for employment should be dispersed throughout the town to avoid areas becoming run-down.	
	<a href="#">LPPO3722</a>	Table 3.0.1 x	Object	Paragraph 3.1 table 3.0.3 part x  This statement is completely at odds with the current planning proposals to pave over large swathes of green belt and conflicts with vulnerable users, healthier lifestyles. It is also inconsistent with 3.2 table 3.0.2 Objective 6.	Comments noted. Green Belt release will be required to provide enough land to meet the Districts development requirements. The Local Authority has a statutory duty to meet housing and employment need for the District.
	<a href="#">LPPO443</a>	3.0.1	Object	Your plans do not support your vision. You foresee "...outlying villages have grown organically to meet their own needs..." and "...the larger villages of Cookley and Blakedown continue..." but your plans are to double the size of Cookley with the core site at Lea Castle. Doubling the size of a village is most certainly NOT growing organically. Should Option A at Lea Castle be selected, Cookley will be annexed to Kidderminster (you will be able to walk from Kidderminster centre to Cookley centre without passing through any fields, greenbelt etc). Cookley will not be a village, it will be a suburb of Kidderminster.	Disagree. The Lea Castle site does not form part of Cookley village.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Taylor Wimpey West Midlands	<a href="#">LPP01549</a>	Table 3.0.1	Support	<p>Vision broadly supported.</p> <p>The Vision envisages that new development is properly supported by the timely provision of suitable infrastructure. Taylor Wimpey recognises that the delivery of new infrastructure will be necessary to support new development to mitigate for needs arising from new residents and the opportunities that may exist for assisting in delivering strategic infrastructure projects that have a far wider benefit to businesses and residents within the District and could assist in addressing a number of the highlighted issues.</p>	Support for the Vision is noted.
	<a href="#">LPP0475</a>	Table 3.0.1	Support	<p>I agree with this plan for the future and particularly wish to highlight the phrase "The outlying villages have grown organically to meet their own needs". As a resident of Cookley I am concerned about the plans to build up to 600 properties on the old Lea Castle Hospital Site and wonder about the pressure it will put on the school and the Doctors surgery in Cookley. I also wish to highlight this phrase "New development in Wyre Forest is properly supported by the timely provision of suitable infrastructure." At the moment there is insufficient infrastructure for this type of development.</p>	Infrastructure is being considered as we progress with the site allocations in the emerging Local Plan. An Infrastructure Delivery Plan (IDP) was produced for the Preferred Options and will continue to be updated as we develop the Local Plan. The revised IDP will be published at the next consultation on the emerging Local Plan.
Homes England	<a href="#">LPP0792</a>	Table 3.0.2	Comment	<p>HCA generally supports the Council's objectives in Table 3.0.2, particularly in relation to addressing the challenges of housing delivery to meet local</p>	Comments noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				needs and the housing requirements for the District.	
Horton Estates Ltd	<a href="#">LPPO844</a>	Aims and Objectives	Comment	Supports Objective 5 relating to maximising the reuse of PDL both within and beyond the main towns. Significant areas of PDL exist beyond the main towns, including industrial estates such as Cursley Distribution Park, and it is important that sustainable redevelopment and growth of these sites is supported even where they lie within the Green Belt (in accordance with paragraph 89 of the NPPF). Following on from the above, the view is taken that Objective 6 should be expanded to refer to the Local Plan’s identification of specific PDL sites.	Comments are noted.
Kidderminster Harriers Football Club	<a href="#">LPPO929</a>	Table 3.0.2	Comment	To support the NPPF (para. 7) requirement that the planning system performs a social role including supporting health, social and cultural well-being. Add to Plan Objectives, Point 1 To address the key challenges facing the District especially in terms of housing, employment, <u>health</u> and transport.	Comment is noted and agreed. The word ‘health’ to be added to the objective wording. (Policy 9 is about ‘Health and Well Being’.)
Kidderminster Harriers Football Club	<a href="#">LPPO930</a>	Table 3.0.2	Comment	To promote sporting opportunities in the district and improved health in accordance with NPPF. And to address some of the health issues of the district as identified by the evidence and highlighted in the Issues and options responses.	Comments are noted.



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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>Add to Plan Objectives, Point 9. <u>To increase provision and to facilitate greater access to sport, recreational and other community facilities in order to encourage improvements in the population of the district's health and welfare.</u></p>	
Historic England	<a href="#">LPP01264</a>	Table 3.0.2 Plan Objective 8	Comment	<p>We would recommend an amendment to Plan Objective 8 as we do not consider that the sentence is appropriate in its current format. We would recommend that there is a specific heritage objective that sets out how the plan will have a positive strategy for the historic environment, as per the NPPF.</p>	<p>Comment on Table 3.0.2 Plan Objective 8 noted.</p> <p><b>ACTION:</b></p> <p><b>Amend Plan Objective 8 to read:</b></p> <p><b>"To maximise opportunities for the inclusion of Green Infrastructure into high quality development in order to provide a good quality of life and maximise the benefits of walking and cycling."</b></p> <p><b>Insert a separate heritage objective 9 to read:</b></p> <p><b>"To promote the historic environment and conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations".</b></p>

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Wyre Forest Friends of the Earth	<a href="#">LPPO1308</a>	Aims and Objectives - Point 6	Comment	Point 6. We are against any intrusion into the Green Belt and do not believe that this will be necessary for reasons set out later in our response.	Comments noted.
	<a href="#">LPPO290</a>	3.0.2	Comment	There are traffic issues to address in Bewdley and Stourport, not just in Kidderminster.	Comment noted and agreed.
	<a href="#">LPPO355</a>	Table 3.0.2 - Point 7	Comment	<p>Point 7 - the traffic in Kidderminster is certainly a major issue, but I think the 'Kidderminster-Blakedown-Hagley' bypass idea of a good few years ago is not feasible anymore, due to development along the original route.</p> <p>Regarding rail, London Midland has lost its franchise and the new 'West Midlands Trains' is promising more and longer trains...we shall see. However, what Kidderminster lacks is an integrated transport system: there is an extremely poor bus connection from the station and I know several people who simply will not walk from the bus station to the rail station due to the ring road underpasses, as they do not feel safe.</p>	Comments are noted. We are working with the Highways Authority (Worcestershire County Council) to address the transport issues around new housing developments. The County Council have also published their Local Transport Plan, which was adopted in 2017.
Taylor Wimpey West Midlands	<a href="#">LPPO1714</a>	Table 3.0.2	Comment	<p>Aim and Objectives are broadly supported.</p> <p>However, there is not a specific objective relating to Stourport-on-Severn. It is the second largest town within the District, it would be prudent to identify an objective specifically related to the</p>	Comments noted.

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				town in order to contribute towards achieving the identified aim.	
Taylor Wimpey West Midlands	<a href="#">LPP01550</a>	Table 3.0.2	Comment	Aim and Objectives supported.	Comments are noted.
Land Research & Planning Associates Ltd	<a href="#">LPP0542</a>	3.0.2	Comment	3.0.1 is repeated.	Comment noted.
	<a href="#">LPP04755</a>	3.0.2	Comment	<p><b><u>Objective: To encourage economic diversification and make sufficient high quality sites available</u></b></p> <p>The definition of ‘high quality site’ depends on the use to which that site is to be put. Economically, small industrial /commercial units in small towns are likely to be more attractive to business, although previous experience does appear to suggest that Kidderminster has probably got an excess of such units. The availability of more than enough unoccupied units is unattractive to potential purchasers/tenants and will detract from property values/rental values in the District.</p> <p><b><u>Objective: To maximise the use of previously developed land.</u></b></p> <p>This, together with the sensitive redevelopment of Kidderminster town centre and other existing</p>	Comments are noted. Green Infrastructure Concept Plans are being prepared for the larger urban extension sites.

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				<p>sites, has to be the most important aspect of the Council’s priorities, in order to avoid the temptation of taking the easy, cheaper and less acceptable option of unnecessarily developing countryside and, more importantly, Green Belt sites.</p> <p><b><u>Objective: To maximise the inclusion of green infrastructure and heritage assets into well designed developments to provide a good quality of life and encourage walking and cycling.</u></b></p> <p>So far as this relates to the south-east of Kidderminster, the wholesale destruction of Green Belt would make these objectives difficult to achieve, irrespective of design. It beggars belief that such proposals can in any way be considered to encourage walking and cycling (or any of the other healthy, countryside activities presently enjoyed by local residents). Improvement in the “quality of life” as an objective is, quite frankly, unrealistic and, one has to assume that “green infrastructure” is an objective reserved for other parts of the district?</p> <p>Wyre Forest has few heritage assets but it is accepted that these have to be protected. It is however unlikely this consideration will have had much relevance to the choice of development</p>	

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				sites and will have little relevance to a choice between Options A or B.	
Worcestershire Wildlife Trust	<a href="#">LPPO1030</a>	Table 3.0.2 Aims and Objectives	Object	We would strongly recommend that a specific objective to protect and enhance the district's biodiversity be added to the list. Protection and enhancement of biodiversity is an important component of sustainable development and is captured in legislation and planning policy to such a degree that it ought to be reflected in the main objectives of the local plan (see for example Section 40 of the Natural Environment and Rural Communities Act 2006 and NPPF paras. 9 and 109 for justification). Such an objective would also link to the first line of Aim ii of the overall Plan vision, which is otherwise not captured in the objectives.	Comments are noted.
	<a href="#">LPPO3723</a>	Table 3.0.2 Objective 7	Object	Paragraph 3.2 table 3.0.2 Objective 7  The alternative route for though traffic will encourage an increase on undesirable use of road transport for Worcester traffic which will bypass the town core and bring no business to Kidderminster. Possible traffic calming measures would reduce benefits of the business case for the new road.	Comments noted. The Transport Modelling study will inform what road improvements are needed for the District. We also seek advice on transport issues from the Highways team at Worcestershire County Council.
	<a href="#">LPPO2412</a>	Table 3.0.2	Object	The plan objectives in 3.0.2 do not address important factors such as air quality in Bewdley, even though the air quality at Welch Gate is	Comments noted. Air pollution and Air Quality Management Areas (AQMA) is addressed in Policy 16A.

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				already well below the allowed standard. While this may be a difficult problem to address, a local plan that ducks this issue is weak, inappropriate and unsupportable.	
Bromsgrove & Redditch DC	<a href="#">LPPO896</a>	Table 3.0.2	Support	The Bromsgrove Council supports the aims and objectives of the plan and think that it has the potential to provide a strong base for planning in Wyre Forest once adopted, although a number of reservations do exist where clarity needs to be provided in order to the Council's concerns to be allayed.	Support and comments are noted.
Kidderminster Civic Society	<a href="#">LPPO1173</a>	Table 3.0.2 Aims of the plan	Support	Fully Support the aims of the plan.	Support is noted.
Sport England	<a href="#">LPPO208</a>	Table 3.0.2	Support	Welcome last bullet. Note active lifestyles can be promoted more widely than just via green infrastructure and heritage assets and in particular would advocate embedding 'Active Design' in local plan policy to increase opportunities for physical activity. <a href="https://www.sportengland.org/facilities-planning/active-design/">https://www.sportengland.org/facilities-planning/active-design/</a>	Support is noted.
Land Research & Planning Associates Ltd	<a href="#">LPPO543</a>	3.0.3	Comment	Parts B & C should ensure that sufficient housing land is allocated as per sections 28 and 35 to allow expansion of rural areas to provide social and economic benefits as per 2 of the bullet	Comment noted. The proposed sites continue to be evaluated to identify the most suitable sites and the final proposed site allocations will be included in the pre-submission documents.

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				<p>points in the NPPF.</p> <p>The present PO document is deficient and does not provide for this. It is therefore not in accordance with the advice in the NPPF and that of PPG 001.</p>	
	<a href="#">LPPO1757</a>	Sections 8, 9, 11, 13	Object	<p>Objects to building on Green Belt. Concerned about traffic, pollution, impact on health, animal habitats and the natural environment.</p> <p>Worried about being saturated with continual housing that has an impact on crime rates and house prices.</p> <p>Strongly objects to both Plan A and Plan B.</p>	<p>Objections noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District.</p> <p>Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>
Gladman Developments Limited	<a href="#">LPPO1196</a>	Paragraph 3.1	Comment	<p>Recommend that the vision is amended at point vii to include a positive reference that makes clear that the identified needs of the housing market area will have been met in full by 2034. This is in line with NPPF.</p> <p>Point v on Bewdley highlights that this will be a 'thriving market town which meets the local community's needs'. This should mean both market and affordable housing needs. Bewdley Housing Survey Report (2016) should be taken</p>	Comments noted.

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				<p>into account. In summary house prices are seen as unaffordable with a shortfall of 213 affordable homes in the next 10 years, especially 2 bed. over 18 years of the plan period this would equate to 383 dwellings. Vision needs to be clarified to explain that Bewdley will meet its market and affordable housing needs in full.</p> <p>Welcome recognition in objectives that Plan will address key challenges in terms of housing employment and transport. This objective would be bolstered further through recognition that these challenges can only be met by positively planning to meet objectively assessed development needs in full.</p> <p>A suitably positive vision must be fully reflected through policies that are capable of securing its delivery. Issues faced in the wider West Midlands area should not be forgotten when considering the context for Wyre Forest through its local plan vision and objectives.</p>	
	<a href="#">LPP04814</a>	Vision	Comment	<p>There is no vision in this plan. Why not develop new villages around the district with modest enlargements of exiting villages? This is what people want. The Consultants report commissioned by Wyre Forest District Council talks of Masterplanning. Although this is a Local planning review, I see no signs of Masterplanning</p>	<p>Chapter 3 sets out the Vision for the Plan area and sets out the Plan Aims and Objectives. The NPPF requires us to locate new development in the most sustainable locations. The most sustainable locations in the District are the three towns, i.e. Kidderminster, Stourport and Bewdley. The</p>



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				in the overall approach. Wyre Forest District Council has a chequered history with Masterplanning. There was a Masterplan for the Spennells development which was excellent, but was silently dropped when the Head of Planning retired.	majority of the new development is therefore focussed on these three towns. For further information, please refer to the Sustainability Appraisal and the Site Selection Topic Paper.
	<a href="#">LPPO3671</a>	Section 3	Object	<ul style="list-style-type: none"> <li>You have not shown evidence how the distinctiveness will remain as the town becomes a commuter town.</li> <li>The varied landscapes and rural nature will be threatened, you have not shown enough evidence to ensure they will be protected. The remaining areas will become crowded, at increased risk of fly tipping, flooding as you build over Green Belt and remove natural barriers to flooding; trees land.</li> <li>Kidderminster has not to date benefited from existing regeneration. What evidence is provided to ensure that this will differ? There are empty homes, on previous developments and retail outlets in the town plus on the Worcester Street remain vacant. By removing fields and greenfield sites you will increase potential for poor health as you remove facilities such as dog walking, cycling, and walking in open countryside. You have not shown any evidence as to how the air quality will</li> </ul>	<p>Objection is noted. The emerging Local Plan is based on evidence – this is known as the evidence base documents in which there is a whole range of documents, including in particular the Objectively Assessed Housing Need Study, Employment Land Review, Green Belt Study, Retail study, etc.</p> <p>The emerging Plan has also been informed by the Strategic Flood Risk Assessment study which has helped to identify the sites which would be more susceptible to flood risk.</p> <p>The council works with Empty Property owners who want to bring properties back into use and would support conversion of units where it is appropriate to do so.</p> <p>The OAHN study tells us what the District requirement is for C2 use, i.e. care homes for the elderly, during the plan period.</p> <p>The Employment Land Review study tells us</p>

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				<p>be improved with the onset of increased traffic flows, congestion, and removal of green field sites and destruction of the countryside.</p> <ul style="list-style-type: none"> <li>• There are currently a large number of care homes with vacancies - What evidence is provided to ensure care home will not be surplus to requirements. You have talked of regeneration however this is contradictory to your plans to build more homes for the elderly.</li> <li>• You have shown no evidence to confirm how the jobs of sufficient number to meet the needs of the 6000 homes in Kidderminster. To suit what is effectively a new town, there needs to be a much wider range of jobs than tourism, minor manufacturing and small retail outlets.</li> </ul>	<p>what the employment requirement is for the District during the plan period.</p>
Historic England	<a href="#">LPP01263</a>	Vision	Support	We support the vision and the reference to heritage throughout.	Support for Section 3 Vision for the Area noted.

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 4: CORE POLICIES INTRODUCTION**

<b>Company / Organisation</b>	<b>Response Number</b>	<b>Para / Policy</b>	<b>Type of Response</b>	<b>Summary of Response</b>	<b>WFDC Officer Response</b>
Land Research & Planning Associates Ltd	<a href="#">LPPO545</a>	4.1	Comment	<p>The drastic need of land to provide the critical shortage of affordable homes has not been addressed in this document.</p> <p>Simply sacrificing the shortage of affordable homes by attempting to say the plan is sound in that there may be sufficient land to accommodate normal market homes is not acceptable, nor is it in accordance with 47 - 49 of the NPPF. So the plan is not sound as it stands.</p>	Comments are noted. The OAHN Study has identified the housing need for Wyre Forest District during the plan period. This study informs the level of new housing development that is required in the district, including affordable housing.
CORE11	<a href="#">LPPO152</a>	4.2	Support	Support for paragraph 4.2.	Support is noted.

### LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Land Research & Planning Associates Ltd	<a href="#">LPPO546</a>	Policy 5A	Comment	<p>Recent Case Law (03 July 2017) gives rise to the argument that if land is within a settlement boundary the premise of "the presumption of sustainable development" should apply. Generally means that any planning application on any land outside a settlement boundary is considered not sustainable.</p> <p>Development is "Plan Led" and provides a framework to assess planning applications. Unless rural settlement boundaries are relaxed during the plan making process the amount of development within them is limited to the extreme. Settlement boundaries hierarchy began in the 1980s, many rural settlements have had little or no expansion to their boundaries since. This situation leads to a massive social division. There is no properly considered expansion of rural settlements in this PO document during the plan assessment process and consequently this document is not in accordance with PPG001 nor the NPPF.</p>	Policy 6B sets out the Settlement Hierarchy for the District. As this is a Green Belt District we have undertaken a Green Belt review which has helped to inform which areas of the Green Belt should be released. Many of our villages are washed over by Green Belt and the Study has advised that this should remain the case.
Worcestershire County Council, Planning Economy & Performance	<a href="#">LPPO1077</a>	Policy 5A	Comment	<p>Item (v) under sub-section (c) in paragraph 5.4 refers to</p> <p><i>"Protecting important historic buildings, monuments, sites of archaeological significance and the integrity of local planning designations"</i>. This</p>	Comments noted and amendments agreed.

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES**

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>raises the question of what the definition of "important" is, as used here? What will constitute an important heritage asset? The NPPF consistently uses "significance", although "importance" is mentioned once in NPPF paragraph 128. In any event, what level of significance or importance does this policy imply is required to render these heritage assets and designations worthy of protection? Use of the word "important" here may unintentionally result in conflict/debate about the importance of any heritage assets that are affected by development proposals and, while the NPPF does specifically make reference to determining the "value" of heritage assets that would be affected by development proposals in paragraph 129, this is again couched in terms of "significance". We therefore suggest that consideration is given to either omitting the word "important", substituting it for "significant", or perhaps introducing some form of weighting/value in the reasoned justification as to what constitutes important. As an example, in this context important sites and designations could potentially include designated heritage assets (e.g. listed buildings, scheduled monuments, registered parks and gardens, or conservation areas), non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments,</p>	

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES**

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				<p>and heritage assets included on a Local List.</p> <p>Part B of Policy 5A states that:</p> <p><i>"Planning applications that accord with the policies in the Plan (and where relevant, with policies in Neighbourhood Plans) will be approved unless material considerations indicate otherwise".</i> We consider that the wording of this policy point requires some adjustment to reflect the fact that the Waste Core Strategy and Minerals Local Plan also form part of the Development Plan covering Wyre Forest District. We would suggest rephrasing the policy point as follows (additions in <b>bold</b>, deletions in strikethrough):</p> <p>"Planning applications that accord with the policies in the</p> <p><b>Development</b> Plan (and where relevant, with policies in Neighbourhood Plans) will be approved unless material considerations indicate otherwise", and referencing the Waste Core Strategy, Minerals Local Plan and Neighbourhood Plans in the supporting Reasoned Justification. For the same reasons, part C should also refer to the Development Plan.</p>	
Taylor Wimpey	<a href="#">LPPO1459</a>	Policy	Comment	Policy 5A is consistent with the presumption of	Comments on Policy 5A are noted.

### LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 5: OVERARCHING SUSTAINABLE DEVELOPMENT PRINCIPLES

Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
West Midlands		5A		<p>sustainable development as in the NPPF.</p> <p>Policies and proposals in the Local Plan need to positively seek opportunities to meet the development needs of Wyre Forest, including the OAHN and provide flexibility to adapt to rapid change.</p>	
Taylor Wimpey West Midlands	<a href="#">LPPO1715</a>	Policy 5A	Comment	<p>Policy 5A is consistent with the presumption of sustainable development as in the NPPF.</p> <p>Policies and proposals in the Local Plan need to positively seek opportunities to meet the development needs of Wyre Forest, including the OAHN and provide flexibility to adapt to rapid change.</p>	Comments on Policy 5A are noted.
	<a href="#">LPPO3963</a>	Development	Comment	<p>Overall, the plan does not require enough of prospective developers. Some of the sites are significant areas and masterplans, guiding principles and 'green infrastructures' should be required at this stage in the Local Plan and at Outline. Specifying the need for future-proofing designs, layout principles so as to drive uniqueness in Landscape, access, housing and open space, as well as providing for housing designs adaptability for future purposes, with regard to new technologies as well as existing green ones, should be made explicit in the Local Plan. It would set a standard that reassures local communities that new areas will add</p>	Comments are noted. Green Infrastructure Concept Plans and Masterplans will be required for the larger site allocations as the Local Plan evolves. This will include green infrastructure proposals.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				to their betterment in living near to it- it will have direct benefits for them- by green routes connected open spaces and clear identities by block designs and legibility. Such broad principles have to be set out in the Local Plan now so as to be sustainable for the future and deliver excellence where there is already a presumption of approval by NPPG guidance.	
Campaign to Protect Rural England	<a href="#">LPPO920</a>	Policy 5A	Object	The emphasis of the policy is inappropriate. It seems to imply that any proposal that a developer may bring forward can potentially be made acceptable. There is no point in having a plan, if it is not made clear that proposals for major development of unallocated sites will be refused. If that is not done, developers will argue that sites that have been considered in the course of the site selection process and rejected are also sustainable, so that planning consent should be given. A further clause should be added to Policy 5A to make it clear that such applications will be refused.	Comments noted. However, if we are unable to maintain our Five Year Housing Land Supply in the future then it is important that we have a policy such as Policy 5A in the Local Plan. Also, the NPPF sets out a presumption in favour of development.
	<a href="#">LPPO3672</a>	Policy 5A	Object	The plan is not sustainable. Green Belt land cannot be used indefinitely.  I do not agree with 5A and do not believe the report has reasoned justification as the Housing Need report does not back this up.	Objection is noted.
Worcestershire	<a href="#">LPPO1031</a>	Policy	Support	Support policy.	Support is noted.



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Wildlife Trust		5A			
Gladman Developments Limited	<a href="#">LPP01197</a>	Policy 5A	Support	Gladman are fully supportive of the emphasis of Policy 5A. It provides assurance of a local approach that will proactively seek to improve the social, environmental and economic well-being of the area by ensuring that development demonstrably contributes to the specific strategic and local vision and objectives of the Local Plan. The ethos of sustainable development is key to assessing planning proposals.	Support for Policy 5A is noted.
CORE11	<a href="#">LPP0153</a>	5.2	Support	Support for paragraph 5.2.	Support is noted.
Land Research & Planning Associates Ltd	<a href="#">LPP0547</a>	5.3	Comment	The Plan does not provide sufficient land for the vital social need for affordable/starter homes. This is essential economically, environmentally and socially.	The Local Plan aims to provide good quality housing serving a range of needs, types and tenures, including affordable housing.
Land Research & Planning Associates Ltd	<a href="#">LPP0548</a>	5.4	Comment	Requires serious modifications covered in previous comments.	Comments noted.
	<a href="#">LPP0444</a>	5.4	Comment	An Economic Role: None of the items listed are supportive of development at Lea Castle - effectively a group of houses in a field. None of the requirements listed are met.  A Social Role: None of the items listed are supportive of the development at Lea Castle - Cookley does not require 600 (or more) new	Issues are noted. Employment use will form part of the Lea Castle development. Lea Castle does not form part of Cookley village; it is a separate area in its own right. Impact on natural environment will be addressed through on-site specific or off-site works via compensatory measures such as Biodiversity offsetting contributions,

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				<p>houses, and a strong sense of place is most certainly not encouraged by doubling the size of the village and then (should Option A be agreed) annexing it to Kidderminster. Your proposals will destroy Cookley as a village. None of the requirements listed are met.</p> <p>An Environmental Role: At the Lea Castle site the environment will be decimated. Whilst the tree line will be left, it will be removed from the greenbelt and therefore will be unprotected in the future. None of the requirements listed are met.</p>	financial contributions to restore or improve existing ecologies and environments. A Green Infrastructure Concept Plan is being produced for the Lea Castle site and will help to inform the site allocations policy and help shape future development on site.
North Worcestershire Water Management	<a href="#">LPPO902</a>	5.4	Comment	Under 5.4 c An environmental role I miss a link to flood risk/water management?	Noted. Amendment required.
Wyre Forest Friends of the Earth	<a href="#">LPPO1309</a>	5.4	Comment	a.iii Promoting accessibility to everyday facilities for those who want to move away from car use or do not have the use of a car will require a determination by the local authority to ensure that basic services are located close to communities they serve. A good rule of thumb is that facilities should be no more than 15 minutes walking distance from any point in a local community.	Comments are noted.
Wyre Forest	<a href="#">LPPO1411</a>	5.4 bullet	Comment	Promoting accessibility to everyday facilities for	Comments are noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
Green Party		point a.iii		those who want to move away from car use or do not have the use of a car will require a determination by the local authority to ensure that basic services are located close to communities they serve. A good rule of thumb is that facilities should be no more than 15 minutes walking distance from any point in a local community.	
	<a href="#">LPP04593</a>	5.4 (b)	Comment	<p>There appears to be little increased health capacity provision in both the OAHN report and the Local Plan.</p> <p>Large Urban estates have evidenced increased anti-social behaviour and increased crime rates, which is acknowledged in the OAHN report but this is not covered in the Local Plan consultation.</p>	Infrastructure is a key issue that is being addressed through the Infrastructure Delivery Plan (IDP). Further infrastructure will be delivered through financial contributions and local or health authority investment to address any issues arising, where necessary and appropriate. Ongoing discussions with health authorities are being had as the Plan progresses.
	<a href="#">LPP04756</a>	5.4	Comment	<p><b><u>Objective: The sensitive consideration of climate change issues.</u></b></p> <p>The Plan requires more houses, more industrial/commercial units and, takes account of an influx of more people to take up the new jobs. That inevitably produces a greater requirement for even more houses and more vehicles, which creates more pollution. That's inevitable and the damage is self-perpetuating. There is no apparent reference to climate change in the proposals, although specifications for new builds may be required to</p>	Comments noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing and employment need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. The Employment Land Review (ELR) sets out the employment requirement for the District.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				include specific features.	
	<a href="#">LPPO503</a>	5.4	Object	Building 5400 homes will have a negative impact on biodiversity, landscape and traffic pollution, especially on the Eastern side.	It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District.
	<a href="#">LPPO3726</a>	5.4	Object	Paragraph 5.4.a.i. The reference to ‘sufficient’ is not objective and is open to interpretation by different readers. The plan does not clarify when ‘sufficient’ land will no longer be obtainable for future generations after towns have spread out into each other following ‘sustainable’ development plans such as this one. The plan does not recognise that there is finite land availability for an island nation and this will at some point become consumed by plans having no regard for the wider picture. As such this is not a plan that is sustainable.	Objection noted. The word ‘sufficient’ is taken from the National Planning Policy Framework (NPPF) paragraph 7, bullet point 1.
	<a href="#">LPPO292</a>	5.4	Support	Support for para 5.4	Support is noted.
Place Partnership Ltd	<a href="#">LPPO1089</a>	5.4 (b)(iv)	Support	WP, WMP and HWFRS fully support the inclusion of this reference and agree that the achievement of it is a fundamental component of truly sustainable development. It also ensures the Local Plan is consistent with paragraphs 58 and 69 of the NPPF on the same subject.	Support is noted.

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				<p>Paragraph 5.4 (b) (iv) also accords with national planning practice guidance, which states:</p> <p><i>'...The prevention of crime and the enhancement of community safety are matters that a local authority should consider when exercising its planning functions under the Town and Country Planning legislation...'</i></p> <p>Paragraph: 010 Reference ID: 26-010-20140306</p> <p>Revision date: 06 03 2014</p> <p>Therefore the inclusion of the reference will ensure the effectiveness and soundness of the Local Plan.</p>	
	<a href="#">LPPO3729</a>	5.5	Support	I support this statement.	Support is noted.
Wyre Forest Friends of the Earth	<a href="#">LPPO1310</a>	5.6	Comment	"....promotion of local food production....."Intrusion into the green belt will reduce local food production. The proposed extension of Spennells will mean the loss of good quality agricultural land which in June 2017 was growing a crop of barley.	Comment noted.
Wyre Forest Green Party	<a href="#">LPPO1403</a>	5.6	Comment	Section 5.6 mentions "....promotion of local food production....." whilst the planned intrusion into the Greenbelt will reduce local food production. The proposed extension of Spennells, for example, will mean the loss of good quality agricultural land which in summer 2017 was growing barley. Past	Comments noted.

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Company / Organisation	Response Number	Para / Policy	Type of Response	Summary of Response	WFDC Officer Response
				years have seen crops of wheat, peas, potatoes and beets	
	<a href="#">LPPO3731</a>	5.6	Support	The 'well designed buildings and places' should also consider multi-story apartments to make efficient use of scarce land and suit the lower dwelling occupancy rate sighted in paragraph 2.9 table 2.0.1 bullet 7	Support and comments noted.
	<a href="#">LPPO504</a>	5.6	Support	The Land is used as farm land why build on it?	It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Report sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
Barratt Homes West Midlands	<a href="#">LPPO814</a>	policy 6A	Object	We believe the plan period should be extended beyond 2034 by at least 2 years to allow for potential delays and still be NPPF compliant. Development requirements should be adjusted accordingly. The emerging plan does not make provision for growth requirements from outside of Wyre Forest. It is possible that Wyre Forest will be asked to help with need from Birmingham and the Black Country. The development requirements of Policy 6A should be referred to as a 'minimum' requirement. This will help to foster sustainable development.	Agree that the plan period should be extended by 2 years. For the pre-submission plan we have extended the plan period by 2 years to 2036, giving a 20 year plan period (2016 to 2036).  We continue to have Duty to Cooperate discussions with our neighbouring local authorities. These discussions have included the Black Country LAs and Birmingham City Council.
Horton Estates Ltd	<a href="#">LPPO845</a>	Policy 6A	Comment	RPS has made separate and detailed representations on the proposed housing requirement under this Policy on behalf of Persimmon Homes South Midlands. Our Clients support these representations, which assert that the Council's current housing target of 300dpa is not reflective of the evidence presented within the 2017 Objective Assessment of Housing Need (OAN) Study. The Council's own evidence indicates that, when adjusted to account for migration trends and suppression of household formation, the demographic need for housing increases to 332dpa, which is already higher than the Council's proposed requirement figure. Furthermore, when taking market signals and affordable housing into account, this need increases further to 468dpa. RPS considers that the minimum OAN that should be considered by the Council in Policy 6A is 468dpa, which would significantly increase the	The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government's new standardised methodology.

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				<p>housing requirement figure over the plan period to 8,424 dwellings. A summary of the OAN steps involved is provided below:</p> <ul style="list-style-type: none"> <li>• Demographic Starting Point – 199dpa</li> <li>• Demographic Adjusted Figure <ul style="list-style-type: none"> <li>○ Longer term migration trends – 291dpa</li> <li>○ Household formation adjustment – 332dpa</li> </ul> </li> <li>• Employment Led – 332dpa</li> <li>• Market Signals – 398dpa</li> <li>• Affordable Housing – 468dpa</li> </ul>	
	<a href="#">LPPO394</a>	Policy 6A	Object	There have been many new houses built in Kidderminster over recent years, in particular on the Stourport Road and the old Sugar Beet site, where there is still space for more houses. I question whether the quantity of new housing being proposed is actually required.	Objection noted. The former sugar beet site is one of the proposed site allocations.
Gemini Properties	<a href="#">LPPO1191</a>	Policy 6A	Object	We believe the plan period should be extended beyond 2034 by at least 2 years to allow for potential delays and still be NPPF compliant. Development requirements should be adjusted accordingly. The emerging plan does not make provision for growth requirements from outside of Wyre Forest. It is possible that Wyre Forest will be asked to help with need from Birmingham and the Black Country.	<p>Agree that the plan period should be extended by 2 years. For the pre-submission plan we have extended the plan period by 2 years to 2036, giving a 20 year plan period (2016 to 2036).</p> <p>We continue to have Duty to Cooperate discussions with our neighbouring local</p>



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				The development requirements of Policy 6A should be referred to as a 'minimum' requirement. This will help to foster sustainable development.	authorities. These discussions have included the Black Country LAs and Birmingham City Council.
Campaign to Protect Rural England	<a href="#">LPPO921</a>	Policy 6A	Support	We welcome the requirement for zero extra comparison retail. The number of empty shops in the upper (or eastern) part of Kidderminster Town Centre makes it clear that Kidderminster has more than enough retail space. The also applies to the other two towns. A separate paper on managing retail decline accompanies this.	Support is noted.
Gladman Developments Limited	<a href="#">LPPO1340</a>	Policy 6A	Object	<p>Policy 6A will set development requirements for district over plan period 2016-34. These should be minimum requirements based on robust and credible evidence. Gladman are concerned with the manner in which OAHN has been established for Wyre Forest District in terms of definition of Housing Market Area and consideration of multiple factors set out in NPPF and NPPG. it is considered there is significant justification to warrant adoption of 332 dpa from the OAHN range presented by Amion in their report as a minimum requirement.</p> <p>Any issues of unmet development needs arising from the wider area should be clearly considered through this policy.</p> <p>Housing need should be expressed as a minimum target over the plan period and the capacity of the</p>	The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government's new standardised methodology.

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				<p>housing allocations contained within the plan should be capable of meeting and exceeding this minimum requirement whilst maintaining a rolling five year housing land supply.</p> <p>Still awaiting publication of Government's proposed methodology for calculating housing needs. Question whether figures in Policy 6A are appropriate. A revised approach is likely to be required at the next stage of the Local Plan.</p>	
Persimmon Homes Limited	<a href="#">LPPO1421</a>	Policy 6A	Object	<p>Plan Period should be extended beyond 2034, by at least two years to introduce flexibility should any delays in its preparation occur. As a consequence, the development requirements should be adjusted to take account of the extended time period.</p> <p>The emerging plan does not currently make provision to accommodate development to meet the growth requirements of Birmingham, the Black Country or any other Local Authority area. It is suggested that Wyre Forest District forms its own Housing Market Area (HMA), notwithstanding the robustness of this claim. However, ongoing discussions will need to be held with the neighbouring authorities in order to consider the strategic priorities and the delivery of new homes.</p> <p>No agreed distribution of Birmingham City housing need shortfall of 37,900 dwellings and the Black</p>	<p>Agree that the plan period should be extended by 2 years. For the pre-submission plan we have extended the plan period by 2 years to 2036, giving a 20 year plan period (2016 to 2036).</p> <p>We continue to have Duty to Cooperate discussions with our neighbouring local authorities. These discussions have included the Black Country LAs and Birmingham City Council.</p>

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				<p>Country Authorities shortfall which is understood will be at least 22,000 dwellings. It is suggested that Wyre Forest forms its own HMA, it is extremely close to the administrative area of Dudley, which is part of Black Country area. In addition, Wyre Forest is in relatively close proximity to Birmingham City and is easily accessible by road and rail to the West Midlands conurbation. As a consequence, it is entirely possible that Wyre Forest will be asked to assist with meeting the growth requirements of the conurbation.</p> <p>This has two potential impacts. First, it could delay the preparation of the emerging Wyre Forest Local Plan, and this supports the extension of the plan period as suggested. Second, it could result in the housing requirement in the plan being increased. As a consequence, the overall housing requirement should be kept under review and policy 6A will need to be substantially revised following the publication of the Black Country Core Strategy.</p> <p>NPPF supports housing in sustainable locations. It requires Local Authorities to “boost significantly” the supply of housing land. It also supports sustainable economic development. The development requirements of Housing Policy 6A should be referred to as “minimum” development requirements that can be exceeded through sustainable development proposals. This approach has been adopted by a</p>	

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				<p>significant number of authorities elsewhere in order to support and foster the delivery of sustainable development.</p> <p>The SHMA identifies an OAHN requirement for 5,400 dwellings during the plan period. It is good practice to over allocate to ensure that the OAHN figure is met. There is some uncertainty regarding delivery of some brownfield allocations. Plan should allocate 15% more housing than the OAHN figure (6,210 dwellings), in order to ensure that the need for housing is met. If WFDC need to accommodate housing need from the Black Country, it will be necessary to increase the housing provision in Wyre Forest by some 2200 so overall need will be 8,410 for the plan period to 2034 (i.e. 467 pa) and to 9,344 if the plan were to be extended by 2 years. These figures do not include the allowances for C2 uses.</p> <p>This increase will also help to accommodate some of the Birmingham's overflow. The existing rail link between Birmingham and Kidderminster, together with the direct road link via the A456, means that the Wyre Forest area also has a functional link with the Birmingham conurbation. Positive planning to accommodate housing pressures will help to reduce house price inflation and ensure that houses are provided for local people too. This will ensure that the workforce can be accommodated in order to fulfil the</p>	

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				economic aspirations of the plan area.	
Persimmon Homes Limited	<a href="#">LPPO1571</a>	Policy 6A	Comment	<p>Evidence underpinning this assessment is the 2017 OAN Study. This supersedes the previous 2016 OAN Study, which identified a range of scenarios for the determination of housing need, before settling upon a midpoint of 254dpa. The Council's latest evidence indicates an uplift in the housing need for the District, led in part by the inclusion of newer population and household projections (2014-based).</p> <p>We offer comments on the existing methodology in the context of consistency with the NPPF and NPPG.</p> <p>As part of the Council's modelling, a number of scenarios have been tested to consider what the impact of varying assumptions will have on the determination of the Council's housing need.</p> <p><i>Demographic Uplifts</i></p> <p>Table 3.2 of the Council's 2017 OAN Study indicates a number of sensitivity tests undertaken to the 2014-based population projections to consider the impacts of longer term migration trends than those used in as part of the government forecasts. The short term forecasts (PG-Short Term/PG-Short Term X) broadly follow the migration profile of the 2014-based projections, whereas the long term scenarios (PG-Long</p>	The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government's new standardised methodology.

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				<p>Term/PG-Long Term X). These scenarios indicate that when using longer term trends than those of the 2014-based population projections, there are increases to the total population change, and consequently, increases to the baseline dwelling stock. As indicated in Table 3.3 of the 2017 OAN Study, the longer term migration profiles draw on population estimates from the previous years which include higher proportions of working age population. This presents a population profile which serves to narrow the old age dependency ratio (percentage of 16-64 against 65+ population), thus responding to the notable ageing of the population in Wyre Forest. RPS is of the view that for Wyre Forest, the longer term population scenarios offer a more appropriate population profile than the 2014-based projections. The 2017 OAN Study has not modelled a 10-year migration scenario and on this basis, the PGLong Term X is considered the most appropriate scenario, which takes a 14 year migration profile, excluding Unattributable Population Change (UPC). This would present an annual household change of 291dpa.</p> <p>In addition to modelling alternative migration profiles the 2017 OAN Study has also considered making adjustments to the household formation rates which underpin the 2014-based household projections. This scenario (modelled under Table 3.4 of the 2017 OAN Study) takes into account suppression to household</p>	

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				<p>formation for the 25-34 and 35-44 age cohorts and proposes that these are returned to levels expressed in the 2008-based forecasts. Making adjustments to household formation rates is supported through the PPG and underpinned by academic research<sup>1</sup> in the area. RPS considers that this is an appropriate adjustment to make which, under the PG-Long Term X migration scenario, would increase the OAN to 332dpa.</p> <p><i>Labour Force and Employment Implications</i></p> <p>This section of the 2017 OAN Study seeks to demonstrate an alignment of the population and labour force, taking into account projections from Cambridge Econometrics, Experian and Oxford Econometrics. RPS agrees that these are appropriate sources of information to draw from though would also encourage the Council to consider how the growth in housing aligns with the proposed targets for employment growth.</p> <p>The three employment forecasts have been derived through a combination of past trends in the District and an assessment of future economic activity which would impact on the projections of growth. The Council's 2017 OAN Study indicates that the highest job forecast (Cambridge Econometrics) can be met through the adjusted long term migration scenarios,</p>	

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				<p>however consideration does not appear to have been given to whether the OAN is capable of supporting the Council’s employment growth target of 40ha included within emerging Policy 6A. This assessment should also be undertaken to ensure that the Council’s approach is thorough and robust.</p> <p>The 2017 OAN Study indicates that the demographic adjusted figure of 332dpa is capable of meeting the expected employment growth in the District through the plan period. Although RPS has not tested this in detail, for the purposes of this assessment, the figure of 332dpa has been taken forward in the OAN calculation process, albeit it should be treated as a minimum, given the Council may need to revisit this assessment in light of the employment growth targets as part of emerging Policy 6A.</p> <p><i>Market Signals</i></p> <p>Section 6 of the 2017 OAN Study reviews information associated with market signals in Wyre Forest, taking the view that the housing market in the District is relatively stable and there is no need for further adjustment to the OAN (paragraph 6.14 refers). RPS does not agree with this view and considers that the relationship of affordability pressures in the District warrant the need for further uplifts.</p>	



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				<p>The 2017 OAN Study makes a number of references to the recommendations of the Local Plans Expert Group (LPEG), which have been taken on board as part of the approach for the adjustment to household suppression. The LPEG recommendations also propose a methodology for the consideration of market signals, based on two indicators; median quartile housing affordability and lower quartile rental affordability. The LPEG recommendations (Appendix 6) indicates four brackets of potential market signals uplift ranging from 0% to 25% depending on the severity of affordability issues, which are replicated below:</p> <ul style="list-style-type: none"> <li>i. House Price Ratio less than 5.3 and Rental Affordability less than 25% = No uplift</li> <li>ii. House Price Ratio at 5.3 - 6.9 and/or Rental Affordability between 25% - 29% = 10% uplift</li> <li>iii. House Price Ratio at 7.0-8.6 and/or Rental Affordability between 30% - 34% = 20% uplift</li> <li>iv. House Price Ratio at 8.7+ and/or Rental Affordability is +35%= 25% uplift</li> </ul> <p>In terms of the median House Price Ratio, the latest data published for 2016 has been published by ONS, having taken over responsibility from the DCLG. ONS has provided two data sets for median affordability,</p>	

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				<p>based on ‘workplace’ and ‘residence’ based earnings. The workplace figures for Wyre forest indicate a ratio of 7.26 for 2016 compared to the residence based ratio of 6.35 Under the care of the DCLG the information that was gathered on affordability ratios was residence based earnings to house prices. The residence based dataset is considered a more appropriate dataset to use, which aligns with the historical projections provided by DCLG. The figure of 7.26 is therefore the most appropriate to use.</p> <p>In terms of rental prices, this can be calculated using lower quartile wages taken from ONS data, aligned with monthly rental data from the Valuation Office Agency (VOA). Set against a monthly lower quartile rental price of £475, this indicates that the rental affordability ratio for Wyre Forest is 33.2%.</p> <p>Relating this data to the LPEG methodology, it is clear that market signals do exist in Wyre Forest and an uplift of 20% should be attributed to the adjusted projections. When taking into account the migration adjusted profile and household formation rates, this increases the OAN from 332dpa to 398dpa.</p> <p><i>Affordable Housing</i></p> <p>The 2017 OAN Study acknowledges that the net annual affordable housing need is 229 dwellings per annum.</p>	

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				<p>Paragraph 8.11 of the study indicates that any new build required to meet this need can be accommodated within the OAN. Over the plan period 2016-2034, this equates to 4,122 dwellings. RPS does not consider that the Council has taken an honest appraisal of what the plan is expected to deliver.</p> <p>Draft Policy 8B of the consultation Local Plan indicates that the Council expect a minimum of 30% affordable housing to be delivered on schemes of 11 or more. Under the optimistic assumption that all of the 5,400 dwellings planned by the Council triggered this policy, this would only deliver 1,620 affordable homes, only 39% of the total affordable housing need. Even under the policy approach advocated under the market signals (398dpa), this would still only be capable of meeting 52% of the overall affordable housing need. It is clear that the affordable housing need in the District is severe and is not capable of being met under the current housing requirements.</p> <p>Paragraph 7.9 of the 2107 OAN Study once again considers the recommendations of the LPEG report to Government as a way of considering an appropriate uplift to the OAN, indicating that an adjustment should be made to the OAN where the total number of homes necessary to meet the affordable housing need is greater than the adjusted OAN. The same paragraph of the study indicates that where this is the case, the OAN</p>	

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				<p>should be uplifted by a further 10%. This is only partially true, as the LPEG study indicates that in such cases an adjustment of 10% can be made or an uplift which will allow for the affordable need to be met in full. Under the Council’s current affordable housing target, this would require 763dpa to be built, in order to address the affordable need of 229dpa and set against the 10% uplift, the OAN would increase to 468dpa. RPS considers that whilst the Council should aim to meet the OAN for market and affordable need in full, a 10% figure appears to be more realistic at this point in time.</p> <p><i>Summary</i></p> <p>Consider that the Council’s current housing target of 300dpa is not reflective of the evidence presented in the 2017 OAN Study. The Council’s own evidence indicates that the when adjusted to account for migration trends and suppression of household formation, the demographic need for housing increases to 332dpa, which is already higher than the Council’s proposed requirement. When taking market signals and affordable housing into account, this need increases further to 468dpa. RPS considers that the minimum OAN that should be considered by the Council in Policy 6A is 468dpa, which needs to be factored into the later stages of plan making. A</p>	

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				<p>summary of the OAN steps involved is provided below:</p> <p>Demographic Starting Point – 199dpa</p> <p>Demographic Adjusted Figure</p> <ul style="list-style-type: none"> <li>o Longer term migration trends – 291dpa</li> <li>o Household formation adjustment – 332dpa</li> </ul> <p>Employment Led – 332dpa</p> <p>Market Signals – 398dpa</p> <p>Affordable Housing – 468dpa</p>	
	<a href="#">LPPO2232</a>	Policy 6A - Development Needs	Object	<p>Believes that the Wyre Forest assessment of housing need of 5400 is an exaggeration and a little over 3000 is more realistic. Account has not been taken of reduced immigration due to Brexit and of an aging population seeking to downsize making more larger homes available. Therefore little green belt should be needed over the next 15 years. The greenbelt beyond Spennells and much of the core are east of Kidderminster should be removed from the plan.</p> <p>In the local press (July 6, 2017) it was stated that funding for the new station had been made available from deals with Greater Birmingham and Solihull Local</p>	<p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough</p>

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				<p>Enterprise Partnership for £1,8 million. A 'Deal' implies action by both parties. Is the other side of the 'Deal' that Kidderminster makes overspill housing available for Birmingham? Have Birmingham council also indicated that they will help to fund the eastern link road? Birmingham needs 89,000 new homes in the next 15 years, their Development Plan has been given the go-ahead to build 51,100. (Birmingham Mail 21 April 2016) Birmingham and Solihull Local Enterprise Partnership lists the names of its overspill satellite towns and names Wyre Forest as the one remaining area not at present a dormitory town.</p>	<p>deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfields sites within the Green Belt.</p> <p>Wyre Forest District does not form part of the wider Black Country or Birmingham Housing Market Areas and therefore does not directly need to accommodate any additional growth needs arising from these local authority areas. However, Duty to Cooperate discussions continue to be had with these neighbouring LAs as the Local Plan Review process progresses. Duty to Cooperate discussions between neighbouring local authorities are a requirement of the NPPF.</p>
	<p><a href="#">LPPO1830</a></p>	<p>Housing Need</p>	<p>Object</p>	<p>I disagree that we need to use this Green Belt at all. You quite clearly state that there is only need for 199 dwellings per annum according to The National Statistics Sub National Population Projections (SNPP) 2014 . Why then have you escalated this to 300 per annum when you also quite clearly state that the population growth in our area is virtually static!</p> <p>Is this to take advantage of the governments incentive of £9000 per dwelling? along with the extra income of council tax? If so then I would point out that the 33%</p>	<p>The housing need is based on population data which includes births and death rates. It is also based on household projections. As the plan period is for 20 years, there will be an increase in population over this time. Also, there is an increasing elderly population in the district which means people are living longer and therefore staying in their homes for longer. In addition to this, the family unit is changing with more single parent families occurring. This puts pressure on the current housing stock.</p>

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				<p>of social housing will attract an element of housing benefit clients and this will of course force up your overall expense.</p>	<p>There simply isn't enough housing to cater for all these different needs over the plan period. In addition to this, people migrate into the area as well as moving out.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>
	<p><a href="#">LPPO3030</a></p>	<p>Policy 6A - OAHN</p>	<p>Comment</p>	<p>1.) The OAHN, based predominately on the Amion Report, appears to have been accepted and the figure of 300 new houses a year has now become fact. In reality the 300 is at the upper end of all the projections and at best is a guess based arguably on historic evidence.</p> <p>2.) I understand that it is necessary to give a definite figure for the number of new houses required to satisfy some bureaucratic obligation, but that does not mean that we should commit to building this number whether we need the houses or not.</p> <p>3.) Kidderminster has been identified as a "self contained housing market" and as such, any new housing will depend largely on an increasing need for</p>	<p>Comments noted.</p> <p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government's new standardised methodology.</p>

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				<p>employment. However, there does not currently appear to be any employer requiring a large increase in the work force in the area. So any future employment growth will depend on relatively small business requirements. I know that Kidderminster is endeavouring to attract new business, but it is also apparent that there is a limit to how many small businesses Kidderminster can support. Looking around the area there are a lot of empty business premises, so I would suggest that we are approaching that new business limit. Indeed, the Amion Report in Section 4 shows no appreciable increase in employment over the period being considered. Also, just recently 2 of the remaining carpet factories have made significant redundancies.</p> <p>So where are all these new jobs for people requiring all this extra housing?</p> <p>4.) The Amion Report refers to the increasing relatively large number of retired generation, but in the longer term the effect of the “baby boomers” will disappear. Also, the latest report shows that the UK’s increasing longevity has considerably slowed down. This, together with the raised pension age should in time lessen the increase in the number of retired people.</p> <p>5.) Since the economic recession of 2008 we are now understandably going through a “catch up” of new</p>	



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				<p>house building everywhere. But, this will surely slow down once we have caught up with the current needs.</p> <p>6.) If the statement in the conclusion by Amion of “8.13 <b>It is not envisaged that available land supply will inhibit achievement of the OAHN figure</b>” is true, then why do we need to even consider releasing Green Belt Sites for building?</p>	
	<a href="#">LPPO4141</a>	Policy 6A	Comment	<p>I am in favour of the council having a long term plan for the Wyre Forest, and recognise the need for some additional affordable housing in the future. However, I believe that the plan as it currently exists is desperately wrong in many aspects, inaccurate, and misjudged.</p> <p>I would like to know on what basis or accurate analysis the suggested growth of the future population has been based. What outreach and analysis has been to objectively look at what the future may look like in terms of revitalising Kidderminster overall? What are the alternatives for replacing the carpet and manufacturing base of our town? Without a planned and costed attempt to bring good jobs to the area I feel that planning for thousands of houses is futile. I desire to see a vibrant lively town, attracting a diverse population, with a properly planned coherent infrastructure to support them in every way. Both my children have now moved away to well paid jobs in</p>	<p>Comments noted. The housing requirement is base on the Objectively Assessed Housing Need (OAHN) study. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>The emerging Local Plan does include policies for affordable housing and will also look to provide a mix of housing types to cater for the needs of the community, i.e. 2 bed, 3 bed, 4 bed family homes. There will also be a C2 use requirement to cater for the needs of the elderly population.</p>

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				other areas of the country where the opportunities are better. I imagine I will not be alone within the projected time scale of this plan in needing to downsize my property, or be in need of care. Has any allowance been made for the age profile of the WF population with increased mortality rates and so many youngsters, like my own, moving away? My feeling is that the town will not require the number of houses planned, and I would welcome serious evaluation of indigenous population growth. This would more actually reflect actual future need.	
	<a href="#">LPPO4223</a>	Policy 6A - OAHN	Object	I do not consider there is a proven need for 300 houses per year as Kidderminster population rate is below the national average. The countryside should be safe guarded by the Council and not used for housing.	Objection noted. The housing requirement figure was based on the OAHN study published in April 2017.
	<a href="#">LPPO4249</a>	Policy 6A - Housing Needs	Comment	Having read LTP4, Green Belt Review and now the Local Plan Review I must conclude the statistics for housing requirement quoted within the documents commissioned are not accurately substantiated and, as such, should be challenged by WFDC before any decision on release of any Green Belt made. Wyre Forest has had a 'virtually static population growth' since 2001-2015 (2.2% at most using ONS statistics). Looking at the population of Kidderminster alone, from 2001 -2011 it dropped by 0.14%. An increase from 2011 Census to current estimate of population set in 2016 of 2.1% at most. If the figures were accurately reviewed and if the true objective of the LPR is to meet	Comments noted. The statistics used for the OAHN are statistics published by the Government from the Office of National Statistics.  The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.  Since the Preferred Options document was consulted on, the Government have published

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				<p>future housing needs of Wyre Forest in line with current projected growth figures – all development could be achieved on brownfield sites. It is therefore the duty of WFDC to ensure developers are not allowed to sit on brownfield sites and that all development of brownfield sites are completed before approving plans for Green Belt development.</p> <p>I believe the Local Plan Review to be a cynical attempt to provide a quick, unsustainable fix for the failing local economy. The LPR identifies a ratio imbalance of elderly to young and the increased impact that is having on services and ultimately finances of WFDC. The LPR identifies that educational standards within Wyre Forest are below that of national average – thus leading to low paid jobs and zero hour contracts, with very little opportunity for home ownership and personal development. Health within Wyre Forest is generally poor and a proactive stance on high levels of obesity is required. The LPR should identify these problems as core issues that need addressing and not covering over with a temporary influx of cash. The LPR promotes actively pursuing in-migration to resolve such issues.</p> <p>Whilst the new homes allowance of £9,000 per unit is an attractive incentive and 1735 units will generate £15,615,000 for WFDC, this is a shortsighted answer to the long-term problems facing Kidderminster and</p>	<p>their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>Wyre Forest as a whole. The introduction of new residents alongside the initial flush of cash will place a burden on already over stretched services. Even considering additional council tax, the proposed development of 3 &amp; 4-bedroom family homes will not help balance the books.</p> <p>It is disingenuous to assume much of the aging population are not contributing to the local economy or are tying up family homes. My own family home will support three generations very shortly. My husband and I both work and run a small business, paying taxes at every level, not least business rates. We fall outside the optimum demographics laid bare within the LPR – which WFDC and their ‘Pro Growth Agenda’ are chasing. Are we to then interpret the LPR as saying in-migration (affluent) is the answer to supporting low paid, zero hour contracts and benefits, rather than WFDC addressing the root cause.</p> <p>Cala homes at Hagley are offering 100% exchanges for their Wychbury Fields development. The homes are within a perfect commuter corridor; have great access to rail links and outstanding schools – yet can’t sell.</p> <p>It is understandable that WFDC are scratching their heads whilst looking for an answer to the issues surrounding the economy of Wyre Forest. However, in only actively pursuing in-migration I believe you are</p>	

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				diverting your responsibilities away from an entire generation.	
	<a href="#">LPPO3376</a>	Insufficient homes too many people	Comment	<p>Questions population growth within the UK and the impact it has.</p> <p>Believes that if more roads are built there will be more cars, could this analogy be relevant to homes as well.</p> <p>It creates a number of other major issues.</p> <ul style="list-style-type: none"> <li>• Schooling</li> <li>• Hospitals</li> <li>• Traffic</li> <li>• Waste management</li> <li>• Job shortages</li> </ul>	Comments noted.
Worcestershire County Council, Planning Economy & Performance	<a href="#">LPPO1083</a>	Policy 6A - Development Needs 2016-2034	Comment	<p>This policy states that 40 hectares of employment land is needed in Wyre Forest over the life of the plan. In "Duty to Co-operate" discussions we have previously highlighted the need to ensure any employment land provision is sufficient to enable some <i>Sui Generis</i> uses such as waste management facilities within the allocated areas. The Reasoned Justification supporting policy 6A focuses on housing provision, with little information provided about the requirements for employment land and we consider that there may be an opportunity to clarify this. However, we welcome the support given to "Waste Developments on</p>	Comments noted. We will consider these comments when updating the policies in the Plan.

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				<p>Employment Land" by Policy 21A (Urban Employment Land) and the supporting Reasoned Justification in paragraph 21.8.</p> <p>We note that similar support is not included within Policy 21B (Rural Employment). The Waste Core Strategy includes a Geographic Hierarchy, and parts of Level 1 (Kidderminster Zone) and Level 2 (Droitwich Spa Zone) of this Geographic Hierarchy are within Wyre Forest District. These cover parts of the rural hinterland surrounding the urban areas, and as such it would be reasonable to expect that some waste development may take place on rural employment land. Policy 21B as worded currently does not appear to favour such development on any scale. We would welcome some amends to the supporting text to acknowledge this and ensure that there is no conflict between development plan documents.</p>	
Stourport High School	<a href="#">LPPO1127</a>	Policy 6A Development Needs	Object	<p>The Plan Period should be extended beyond 2034. The Framework is clear that Local Plans should have a 15 year time horizon. The plan is currently expected to be adopted in 2019. Any delays in the plan making process has the potential for the adoption date to slip and the plan to not have a 15 year time period from the date of adoption and therefore not be a Framework compliant plan. The Plan Period should be</p>	<p>Agree that the plan period should be extended by 2 years. For the pre-submission plan we have extended the plan period by 2 years to 2036, giving a 20 year plan period (2016 to 2036).</p> <p>We continue to have Duty to Cooperate discussions with our neighbouring local</p>

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				<p>extended by at least two years to introduce additional flexibility should any delays in its preparation occur. As a consequence, the development requirements should be adjusted to take account of the extended time period.</p> <p>The emerging plan does not currently make provision to accommodate development to meet the growth requirements of Birmingham, the Black Country or any other Local Authority area. It is suggested that Wyre Forest District forms its own Housing Market Area (HMA). Ongoing discussions will need to be held with the neighbouring authorities in order to consider the strategic priorities and the delivery of new homes.</p> <p>At the present time there is no agreed distribution of the significant Birmingham City housing need shortfall of 37,900 dwellings. In addition, the Black Country Authorities have recently confirmed that the emerging Black Country Core Strategy 2 will be unable to allocate sufficient land to meet the emerging objectively assessed housing figure. Whilst the full extent of the shortfall is yet to be established, it is understood that it will be at least 22,000 dwellings. As a consequence, an approach needs to be agreed for the distribution of this significant housing shortfall elsewhere. Whilst it is suggested that Wyre Forest forms its own HMA, it adjoins the administrative area of Dudley, which is part of Black Country area. In addition Wyre Forest is in</p>	<p>authorities. These discussions have included the Black Country LAs and Birmingham City Council.</p>

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				<p>relatively close proximity to Birmingham City. As a consequence it is entirely possible that Wyre Forest will be asked to assist with meeting the growth requirements of the conurbation.</p> <p>This has two potential impacts. Firstly it could delay the preparation of the emerging Wyre Forest Local Plan, and this supports the extension of the plan period as suggested. Secondly, it could result in the housing requirement in the plan being increased. As a consequence, the overall housing requirement should be kept under review and policy 6A require substantial revisions following the publication of the Black Country Core Strategy.</p> <p>Also it is a clear objective of Framework to support the delivery of housing in sustainable locations. Paragraph 47 of the Framework requires Local Authorities to “boost significantly” the supply of housing land. The Framework is also clear that sustainable economic development should be supported. The planning system should not act as an obstacle to sustainable economic growth. As a consequence, it is our view that the development requirements of Housing Policy 6A should be referred to as “minimum” development requirements that can be exceeded through sustainable development proposals. This approach has been adopted by a significant number of authorities elsewhere in order to support and foster the delivery</p>	



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				of sustainable development.	
Dudley Metropolitan Borough Council	<a href="#">LPPO1045</a>	Table 6.0.1	Comment	<p>As a member of GBSLEP, WFDC took part in Strategic Housing Needs Study. This confirmed that WFDC did not form part of wider housing market area. As the south Worcestershire authorities have a recently adopted plan, for this plan WFDC is a freestanding HMA. Amion OAHN report 2017 notes ageing population and internal migration as main source of population growth. This mainly comes from Greater Birmingham and Black Country. OAHN study suggest OAN of 300 dpa, compared to demographically driven figure of 199 to take into account need for economic growth inline with the approach adopted by South Worcestershire.</p> <p>The Birmingham Development Plan acknowledges a shortfall of 37,900 dwellings and further evidence of a shortfall is emerging in the Black Country. With established migration patterns with WFDC from both these areas, it is logical to conclude that increased supply in WFDC is likely to be met by additional migration from GBBC HMA. The proposed modification to the Telford and Wrekin LP reflect this issue.</p> <p>We would welcome opportunity to discuss this matter under Duty to Cooperate procedure</p>	<p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.</p> <p>WFDC have undertaken a number of Duty to Cooperate meetings with Birmingham City Council and the Black Country Local Authorities and will continue to do so during the Local Plan Review process.</p>

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Hagley Parish Council	<a href="#">LPPO777</a>	Policy 6A Development Needs	Object	<p>Housing Numbers</p> <p>NPPF requires WFDC to meet its Objectively Assessed Housing Need (OAHN). A paper was produced in 2016 indicating that the need was 254 dwellings per year, which exactly matched what had actually been delivered in recent years. 254 is greater than the old target under WFCS, which suggest that WFDC has not refused any applications on housing supply policy grounds. It follows that 254 represents unrestricted housing demand, which ought to be a very good indication of housing need. It thus seems that the target in the Consultation Document, far from being Objectively Assessed Need is a highly subjectively selected target. The target should only be 254 x 18 = 4572.</p> <p>Mitigation</p> <p>If WFDC pursue a target above its OAHN to meet Birmingham’s housing needs, and makes a contribution to its alleged housing land deficit, some very substantial offsite expenditure will be required to mitigate the damage to Hagley:</p> <p>A bypass round Hagley, or link road past it between A456 and A491, south of Hagley.</p> <p>Measures to make rail commuting more</p>	<p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.</p> <p>The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements for the emerging Local Plan.</p>

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				attractive. Currently a lack of car parking capacity at stations on the Kidderminster-Stourbridge-Birmingham line. Stourbridge Junction Station is full fairly early in the morning, and there is no easy way to enlarge it. The car park at Hagley holds 25-30 cars, with nowhere to provide more. Blakedown Station has little parking at all, and there is little capacity at Kidderminster Station. There is a large field next to Blakedown Station, immediately east of it, between A456 and the railway. The Plan should designate this as a potential rail-related Park and Ride car park.	
Bromsgrove & Redditch DC	<a href="#">LPPO897</a>	Policy 6A	Comment	Bromsgrove DC has no reason to dispute the Development Needs outlined in table 6.0.1. Pleased to see reference at para.6.8 to duty to cooperate requirement. Acknowledge that WFDC does not form part of wider Birmingham HMA. It is important that Wyre Forest LP has sufficient mechanisms in place should a request to meet any needs from the wider BHMA are forthcoming.	WFDC continues to undertake Duty to Cooperate discussions with its neighbouring Local Authorities during the Local Plan Review process.
Birmingham City Council	<a href="#">LPPO893</a>	Table 6.0.1	Comment	As a member of GBSLEP, WFDC took part in Strategic Housing Needs Study. This confirmed that WFDC did not form part of wider housing market area. As the south Worcestershire authorities have a recently adopted plan, for this plan WFDC is a freestanding HMA. Amion OAHN report 2017 notes ageing population and internal migration as main source of population growth. This mainly comes from Greater Birmingham and Black Country. OAHN study suggest	The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government's new standardised methodology.  WFDC have undertaken a number of Duty to Cooperate meetings with Birmingham City

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				<p>OAN of 300 dpa, compared to demographically driven figure of 199 to take into account need for economic growth inline with the approach adopted by South Worcestershire.</p> <p>The Birmingham Development Plan acknowledges a shortfall of 37,900 dwellings and further evidence of a shortfall is emerging in the Black Country. With established migration patterns with WFDC from both these areas, it is logical to conclude that increased supply in WFDC is likely to be met by additional migration from GBBC HMA. The proposed modification to the Telford and Wrekin LP reflect this issue.</p> <p>We would welcome opportunity to discuss this matter under Duty to Cooperate procedure.</p>	<p>Council and the Black Country Local Authorities and will continue to do so during the Local Plan Review process.</p>
Rentplus	<a href="#">LPPO1107</a>	Policy 6A and Development Strategy	Comment	<p>This policy rightly sets a clear annual target for affordable housing, which is fully supported as this sets a clear ambition for the Council to deliver housing to meet local needs. It is important to meet the full range of housing needs in order for the District's residents to thrive, as encouraged by the recent White Paper. Crucially, that Paper made widening the definition of affordable housing a central theme to planned tweaks to the NPPF and it is this that will need to inform the future direction of the Local Plan Review. Once those changes have been published (as we expect later this year) it will be important to review the evidence base</p>	<p>Support and comments noted.</p>

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				once more to ensure the maximum level of affordable housing can be delivered through an appropriate policy base. In addition to those points referenced at paragraph 6.9, we recommend that a specific mechanism be included in Policy 6A to require specific measures to be taken if housing supply falls below (or rises above) a set point. This should prioritise measures and specific sites (dependent on the preferred option that is chosen for the Development Strategy) that may bring forward a greater supply of housing, and particularly schemes with a high proportion of affordable housing.	
	<a href="#">LPPO496</a>	Policy 6A	Object	Plan states "Insufficient sustainably located readily available brownfield or non-Green Belt land to accommodate the necessary housing and employment growth required in the plan period." This only arises if Wyre Forest District need to allow land for developing 6,000 properties, due to the historically low changes to the number of residents in the Wyre Forest District then I do not believe we need this at all.	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.
Taylor Wimpey West Midlands	<a href="#">LPPO1464</a>	Policy 6A	Comment	Market Housing  Wyre Forest District Council has commissioned an objectively assessed needs (OAN)	The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government's new

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				<p>Consideration of alternative scenarios and household projections is supported, Over plan period, likely to be contrasting economic cycles. A 14 year period, upon which trends should be replicated, is reasonable.</p> <p>Appropriate to make adjustment for headship rates to provide for households that have not previously formed (due to economic circumstances and low housing supply) to form in the future and not remain constrained.</p> <p>Level of employment growth arising from the long-term demographic scenarios are in excess of what all three employment growth projections generated. Would be useful to provide an analysis on previous annual levels of employment growth to put the new data into context.</p> <p>Amion suggests a dwelling requirement of 300 dwellings per annum, 5,400 dwellings over the plan period. This is near the upper end of the alternative scenarios considered and most comparable to long term trends. The dwelling figure is 32 dwellings per annum short of the scenario, which does not include UPC. Clearly, if ONS has been incorrect by including UPC and migration patterns are higher, there is a risk that the dwelling requirement is insufficient to meet those needs. Whilst it is proposed, as considered below, that an additional 400 dwellings will be added</p>	<p>standardised methodology.</p> <p>WFDC have undertaken a number of Duty to Cooperate meetings with Birmingham City Council and the Black Country Local Authorities and will continue to do so during the Local Plan Review process.</p> <p>The Employment Land Review is also being updated in line with changing guidance in the NPPF / PPG and will use the plan period up to 2036.</p>

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				<p>to the supply to allow for under delivery, if the higher dwelling requirement of 332 is needed as forecasted the excess will be wiped out resulting in a very lean land supply.</p> <p>The OAN evidence is a good baseline assessment of the housing requirements in Wyre Forest, the local planning authority should further consider published economic past trends against those put forward by the independent forecasting houses to determine, which is more accurate. Further work to identify if, in the context of Wyre Forest, it is appropriate or not to include UPC in the projections of the scenarios tested.</p> <p>There is unmet need arising from neighbouring HMAs. There is a shortfall in excess of some 50,000 homes in the Greater Birmingham HMA, which must be provided for. It is important that given the close relationship Wyre Forest has with the nearby authority Dudley (which is in the Greater Birmingham HMA), as evidenced by Figure 2.3 (migration flows) and 2.4 (labour flows), that appropriate provision for the unmet need is made available.</p> <p>Wyre Forest is within the Greater Birmingham &amp; Solihull and Worcestershire Local Enterprise Partnership area. The level of housing provision proposed needs to be consistent with the aspirations of the LEPs. Having reviewed the evidence, it appears</p>	

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				<p>that such economic aspirations have not been tested and it is unclear whether the level of dwelling provision is appropriate to meet those needs. It is suggested that further work is commissioned to test whether the dwelling requirement is fit for purpose and is joined up with other strategies and plans to achieve wider strategic aspirations.</p> <p>Affordable Housing</p> <p>Requirement for 1,620 affordable homes or 90 dwellings per annum, which is 30% of the overall dwelling requirement. When comparing this to the affordable housing need evidence, the 90 dwellings per annum is far less than the 229 dwelling affordable need identified by Table G1 within Appendix G: Affordable Housing Need Calculations within the Amion OAN Report of April 2017. The reason for the reduced policy requirement is potentially due to the fact that affordable housing delivery has been quite poor in previous years (as set out in Table G4) achieving an annual average of 47 dwellings per annum over the last four years. It is advised that in order to ensure the affordable housing requirement is deliverable, affordable housing viability work should be undertaken by the Council.</p> <p>C2/ Institutional/ Care Home</p>	



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				<p>540 bed spaces for C2/ Institutional/ Care Homes categories is supported and will assist to ensure the specific needs of the population are met. The principle of separating the C2/Institutional/Care Home requirement from the C3 requirement is supported, any consideration of housing land supply position contained within the housing trajectory should also exclude the C2 provision.</p> <p>Employment Land</p> <p>The 40ha requirement of employment land is informed largely by the June 2016 ELS by Lichfields, which notes that the Wyre Forest District economy has been behind regional and national trends in jobs growth over the period 1997-2015. The baseline forecasts, labour supply scenarios and subsequent analysis of past development rates lead the ELS to arrive at employment land requirements up to 2032 of between 31ha and 37ha. The 40ha requirement in the Local Plan looks to be broadly in line with these estimates, given it looks at requirements for a period up to 2034 – two additional years compared to the ELS timeframe. This analysis all seems logical and is a fair reflection of what future land demand could look like in Wyre Forest if past trends continue.</p> <p>A concern with the 40ha employment land requirement is that it does not appear to take into</p>	

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				<p>account what could be needed if Wyre Forest District saw stronger economic growth under a “policy -on” scenario. Such a scenario is discussed in the ELS, which specifically mentions the importance of the Hoo Brook Link Road Phase 2 project and the impact this will have on employment land requirements in the District. The resulting land requirements under this scenario could see Wyre Forest need around 60ha of employment land. By taking the lower figure of 40ha, there is a risk that the economy of Wyre Forest District remains stagnant over the period of the Local Plan and falls behind other parts of the region. For example, the Worcestershire Local Enterprise Partnership’s Strategic Economic Plan has a vision to grow the LEP economy by 25,000 jobs by 2025 and to support growth sectors such as advanced manufacturing. It is unlikely that Wyre Forest District will make much of a contribution to this target if its economy only grows under baseline conditions. Consideration should therefore be given to increasing the quantum of employment land brought forward by the Local Plan.</p> <p>2.23 If employment growth is increased, the level of housing need should be reconsidered accordingly to ensure a jobs balance ratio that ensures a level of self-sufficiency and sustainability.</p>	

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	<a href="#">LPP01981</a>	Policy 6A	Object	<p>Policy 6A - Development needs 2016 - 2034.</p> <p>The amount of dwellings proposed seems to be vastly overestimated when correlated with figures for population projections from the ONS. WFDC state that 5400 dwellings will be required. Taking the ONS average household occupancy of 2.4 people per dwelling, this equates to a population growth of 12960 people between 2019 and 2034. ONS projections indicate that Wyre Forest population will grow from 100,000 in 2019 to 104,000 in 2034. This projected growth of 4000 people equates to a requirement for 1667 dwellings or just 31% of the 5400 stated in the proposal.</p> <p>The Wyre Forest District is effectively stagnant in terms of economic development and population growth and has been for several decades. Therefore the District Council have an obligation to facilitate change in these circumstances, but even if economic regeneration was to lead to a requirement for <u>double</u> the population growth projected by the ONS this would still only require an additional 3300 properties, nowhere near the 5400 anticipated in the proposal.</p> <p>Given that Objective 12 of the SA Framework is "To Maintain the integrity of the Green Belt within the District", all housing requirements could be easily accommodated without encroaching on any Greenbelt</p>	<p>Objection noted.</p> <p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government's new standardised methodology.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				<p>land as proposed under Policy 30. Using your figures from Table 30.0.1 to 35.0.1, and removing all sites that would require removal of the land from Green Belt, 2190 dwellings could be built on identified sites, many more than would be required using the ONS figures of projected population growth. There are also other possible sites within the Wyre Forest District not currently within the Green Belt that could be considered for residential development not identified in the proposal - the current town centre zombie streets of Worcester Street, the lower end of Coventry Street and much of the pedestrianized area being one in particular. No-one would particularly miss either The Swan Centre or Rowland Hill centre. The possibilities for urban regeneration here, combined with green spaces are tremendous.</p> <p>Therefore I object to all proposed residential development on existing Green Belt detailed in sections 30 to 35. Justification 31.1 is also invalid as no development on Green Belt is required.</p> <p>In summary this plan is fundamentally flawed with unrealistic anticipated population growth. The Council need to go back to the drawing board and, using realistic figures based, make a new proposal.</p>	
Summerfield Against Land	<a href="#">LPPO1621</a>	Development	Object	<ul style="list-style-type: none"> <li>If the 2016 OAHN is accepted that would fulfil the combination of the Core need and <i>all</i> the</li> </ul>	The OAHN study published in April 2017 followed the government guidance on OAHNs

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Transformation		Needs		<p>Option B housing requirements for Kidderminster, Stourport and Bewdley i.e. 4572 dwellings</p> <ul style="list-style-type: none"> <li>• We reject the numerical argument that you advance in respect of Option A, especially the transformation of the dwellings requirement from 5,400 to 6,304, which represents a 16.7% increase and is equivalent to a 21-year build.</li> <li>• It is unclear why the annual requirement increased from 254 p.a. in 2016 to 300 p.a. in 2017. Also, to make allowance for sites not coming forward the maximum number of dwellings in Option A rises to 6,304 dwellings or 350 p.a. and Option B to 6,559 or 364 p.a.</li> <li>• We conclude that the 2016 OAHN could be met with very limited use of the Green Belt (Option B) and that the subsequent increase the “critical mass” proposition together with your ‘margin of error’, justifies the use of Green Belt and supports the proposed relief road, especially in Option A. This is overdevelopment on an industrial scale.</li> </ul>	available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.
	<a href="#">LPPO2777</a>	Policy 6A	Object	Assessment of housing needs should be scaled down to the more realistic population growth projection of 5.1%.	Objection noted.
Spennells Against	<a href="#">LPPO1725</a>	Housing Need	Object	The NPPF states that we should consider only future scenarios that could <u>reasonably be expected</u> to occur.	Objection noted.

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Further Expansion				<p>The National Statistics Sub National Population Projections (SNPP) 2014 evidences a growth of population for the outlook period at 4.7%. Using this growth figure the need is 199 dwellings per annum (2985 in total to 2034). This negates the need to take Green Belt land.</p> <p>Even the PG Short Term Data shows an increase of 5.8% which is twice the growth of the last 15 year period and still only has a need for 229 dwellings per annum. We firmly believe that growth figures will be less than 5.8% based on national projections. With the forthcoming government attempts to reduce net immigration, this will bring the figure much closer to the 2.7% experienced over the last 15 years.</p> <p>The Amion Report assumes a much higher rate of population growth than the actual growth over the past 15 years and we believe it is therefore flawed.</p> <p>Increasing the allowance for vacant properties to 4.5% and the vacancy rate by 1.3% means that the housing demand has been unnecessarily increased by 578 dwellings (or 39 per annum).</p> <p>The need for new dwellings in Wyre Forest up to 2034, is realistically around the 3000 number and therefore the need to use any Green Belt land is unnecessary.</p>	<p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.</p>

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				<p>WFDC do not have to accept the OAHN targets for housing, especially if there are large amounts of Green Belt or other protected land. Brighton and Hove, Watford, Hastings and Crawley have recently set housing targets of only half their assessed need.</p>	
Wyre Forest Community Housing	<a href="#">LPP01639</a>	Policy 6 A	Comment	<p>We argue that the standard approach to housing need is somewhat flawed and underestimates the housing need and feel that the conclusion underestimates both demand and need.</p> <p>Table 8.04 clearly describes how unaffordable market sale and market rent solutions are within the District.</p> <p>The numbers for affordable homes seems at odds with the Wyre Forest District Local Plan Review Objective Assessment of Housing Need April 2017, which on page 48 states:</p> <p>“8.11 The analysis undertaken suggests and annual requirement of 229 dwellings per annum to support affordable housing needs requirements.”</p> <p>Our own research based on our Group’s Housing Needs Register, which we maintain on the District Council’s behalf, demonstrates a waiting list of just over 2,100. Of these, some 1,300 have the highest</p>	<p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.</p>

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				“Gold” priority with 64 statutory homeless, 486 homeless or threatened with homeless, and 184 overcrowded (July 2017).	
Taylor Wimpey West Midlands	<a href="#">LPPO2251</a>	Table 6.0.1	Comment	<p>Key concerns :</p> <ul style="list-style-type: none"> <li>• OAN - need to compare published economic past trends with economic forecasts to test appropriateness of requirement</li> <li>• Consider requirement to take some of Greater Birmingham's housing need once work is published in light of close relationship with Dudley</li> <li>• Ensure that C2 institutional requirement is kept separate from land supply calculations</li> <li>• Employment land requirement of 40Ha does not consider a 'policy on' scenario of stronger economic growth as per Worcestershire LEP Strategic Economic Plan</li> <li>• Housing land supply should be increased to allow for 20% buffer in line with LPEG recommendations</li> <li>• Options A and B have both benefits and dis-benefits. Suggest a combination would ensure rolling 5 year supply can be maintained as SUE may not be completed in plan period. Recommend that Plan period is extended or further ADRs proposed around Kidderminster to provide an enduring Green Belt boundary.</li> </ul>	<p>The OAHN study published in April 2017 followed the government guidance on OAHNs available at the time. The OAHN study will be updated in line with changing guidance in the NPPF / PPG and will use the Government’s new standardised methodology.</p> <p>WFDC have undertaken a number of Duty to Cooperate meetings with Birmingham City Council and the Black Country Local Authorities and will continue to do so during the Local Plan Review process.</p> <p>The Employment Land Review is also being updated in line with changing guidance in the NPPF / PPG and will use the plan period up to 2036.</p>



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				<ul style="list-style-type: none"> <li>Housing policies need to be more flexible to allow new development to reflect local character and needs</li> </ul>	
	<a href="#">LPPO4299</a>	Policy 6A	Comment	We question the need for 5,400 houses up to 2034. Why would that many people want to move into a town such as Kidderminster which seems to have lost its industrial base?	Comment noted. The housing requirement is based on the evidence provided in the OAHN study.
	<a href="#">LPPO4046</a>	Annual requirement	Object	I don't think it is a good idea to build 300 houses a year. I do not approve if this and would like it not to happen. Building of these houses will cause major environmental damage over the up coming years.	Objection noted.
	<a href="#">LPPO4051</a>	Policy 6A	Comment	<p>There are no time lines in terms of site! infra-structure development other than a house building figure of 300/year. Which sites and when? Does the WFDC intend to review the "Final plan" after the 2021 and 2031 census figures are released and modify accordingly?</p> <p>The Local Plan is flawed and the basic needs for Wyre Forest over the next two decades should be reconsidered</p>	The Preferred Options document did include details and maps of the potential site allocations. These sites were consulted on as part of the consultation.
	<a href="#">LPPO4068</a>	Employment Needs	Comment	Easter Park brings another concern. We understand not all units are taken – why is this? Maybe wrong size, shape, position etc. so how is it known what is	Some employment sites are still recovering from the effects of the recession. The success of an employment site is dictated by the

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				required by each potential business – from a one employee one through to possibly a 500+ one. How can such vast requirement be addressed – no doubt by leaving ‘land for industrial building’ untouched for years on end.	climate of the economic market. For the district to be sustainable, it needs both housing and employment sites so people can live and work in the district.
	<a href="#">LPPO4308</a>	Policy 6A	Comment	<p>Quote from Government news:</p> <p><b>"Getting the right homes built in the right places</b></p> <p>Consulting on the principle of a new, standardised way of calculating housing demand to reflect current and future housing pressures. Every local area will need to produce a realistic plan and review it at least every 5 years.</p> <p>Currently 40% of local planning authorities do not have an up to date plan that meets the projected growth in households in their area. Fixing this will help make sure enough land is released for new homes to be built in the parts of the country where people want to live and work and ensure developments take heed of local people’s wishes, while continuing with maximum protections for the Green Belt.</p> <p>Councils and developers will also be expected to use land more efficiently by avoiding building homes at low density and building higher where there is a shortage of land and in locations well served by public transport</p>	Comments noted. The NPPF Para 83 states that “Local planning authorities with Green Belts in their areas should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.” As the Council is undertaking a Local Plan Review, it can amend the Green Belt boundaries through this process. This will be tested at examination stage by the Planning Inspector.

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				<p>such as train stations."</p> <p>I do hope you will listen to all the information you receive during the consultation period, especially since your plan does not meet the government guidelines to protect Green Belt.</p>	
	<a href="#">LPPO4461</a>	Development Needs	Comment	<p>It seems that the main thrust behind this Plan is the stated Government requirement for Wyre Forest DC to provide 6000 houses by 2034. If there is any direct evidence for this number in the review then it is not shown clearly. What is clear is that the population of the Wyre Forest District is, and has been, practically static for a number of years. So why does the district require such a large amount of additional housing? Is this something being driven by the GBSLEP? If so why? Would this be accompanied by jobs or would Wyre Forest become a 'dormitory district' with all the attendant problems of a large commuting population.</p>	<p>There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>
	<a href="#">LPPO4442</a>	Development Needs	Comment	<p><b><u>Housing Needs and Numbers</u></b></p> <p>I believe that the Council's projections for the population growth of Wyre Forest in the local plan are unrealistic. Over the last 10 years, the population growth has virtually been static and has only risen by approximately 1000, which is below the national average. Our population is also described as "ageing". We do not have the industry to attract younger workers to the area.</p>	<p>The housing need is based on population data which includes births and death rates. It is also based on household projections. As the plan period is for 20 years, there will be an increase in population over this time. Also, there is an increasing elderly population in the district which means people are living longer and therefore staying in their homes for longer. In addition to this, the family unit is changing with more single parent families occurring. This</p>

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					<p>puts pressure on the current housing stock. There simply isn't enough housing to cater for all these different needs over the plan period. In addition to this, people migrate into the area as well as moving out.</p> <p>The emerging plan will also be allocating employment sites. This is so people can live and work in the district, creating a more sustainable place.</p>
	<a href="#">LPPO4637</a>	Housing need	Comment	<p>Finally it seems to me that the new build for Lea Castle is not designed to meet the needs of the local population but that of those further afield who would like to live in a semi rural area but commute to their employment in Birmingham and Worcester. Please understand that commuters bring little to their residential areas, often using eateries and retail outlets either close to their work place or in large retail parks such as Merry Hill.</p> <p>It would be beneficial to the local population if the housing met our needs and also include such organisations as care homes, sheltered housing and hospice to meet the needs of our expanding ageing population.</p>	Comments noted. The proposed site allocations in the emerging Local Plan are to meet the needs of the District in terms of housing and employment. The evidence for this need is shown in the OAHN study and the ELR study – both of which are being revised and updated for the pre-submission plan in light of Government changes to national planning policy.
	<a href="#">LPPO4898</a>	Policy 6A	Comment	Puzzled by the figures used for deciding on the required number of new builds. In 6.8 of the plan it states 'The housing requirement reflected by this plan	The housing need is based on population data which includes births and death rates. It is also based on household projections. As the plan

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				<p>is based solely by that required by the needs of the Wyre Forest.' Given that the population is expected to remain fairly static, and that inward migration is minimal, even allowing for an increase in inward migration, a 12% increase in housing stock seems excessive.</p> <p>I would also question the need to provide more industrial units. There are many vacant plots on the various industrial estates in the district, why free up more land when there is obviously a supply of units and plots of varying size to suffice for years to come.</p>	<p>period is for 20 years, there will be an increase in population over this time. Also, there is an increasing elderly population in the district which means people are living longer and therefore staying in their homes for longer. In addition to this, the family unit is changing with more single parent families occurring. This puts pressure on the current housing stock. There simply isn't enough housing to cater for all these different needs over the plan period. In addition to this, people migrate into the area as well as moving out.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p> <p>With regards to the employment land, the Council is also updating the Employment Land review study. There is a legal requirement for the Council to provide for its employment need as well as its housing need. To make a place sustainable it needs employment as well as housing. By creating employment opportunities it enables people to live and</p>

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					work within the district.
	<a href="#">LPPO407</a>	Locating development	Comment	<p>Not convinced that <b>any</b> green field sites need to be developed to provide the dwellings that you say will be needed. There appears to be a <b>massive</b> brownfield site that has not been considered at all. This is pretty well the whole of Kidderminster Town Centre. It is a ghost town during the evening. A huge proportion of the shop premises are empty. There is a very significant number of charity shops - these appear to help to freeze out proper businesses that have to pay their staff proper wages, pay for their new stock etc.</p> <p>European town centres in the evenings are full of people going about normal activities and this leads to a feeling of safety and enjoyment. The reason for this is that there is <b>housing in the town centres</b>. All the shops have apartments above them.</p> <p>We have been told that there is nothing that the council can do to encourage property owners to convert some or all of their premises into living accommodation. I cannot believe that it is in anyone's</p>	Comments noted. Housing provision in the town centre is being considered as part of the Local Plan Review process. We also have an emerging Policy on housing for older people.

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				interest to keep all these shops empty and some pressure points should be sought.	
Gemini Properties	<a href="#">LPPO1192</a>	Policy 6B	Object	Generally support criteria identified but feel additional ones are required. In order for sites to be allocated for development they should be "deliverable" - be available now, offer a suitable location of development now and be available with a realistic prospect that development will take place. The proposed location should be market facing and clear evidence should be available that the housing allocations are suitable and achievable during the course of the plan period.	Objection noted. This is already covered by the NPPF so no need to add it to the policy wording in Policy 6B.
Stourport on Severn Civic Society	<a href="#">LPPO1296</a>	Policy 6B	Comment	In relation to Stourport-on-Severn:  Development on the Green Belt should be minimal and brown field sites fully optimised. It is essential to retain the character of the town and its separate identity. Further development on the edges of the town would cause deterioration of a valuable landscape as well as a loss of worked farming land.	Comments noted.
Chaddesley Corbett Parish Council	<a href="#">LPPO1035</a>	Policy 6B	Support	We support this segmentation of locations for any new developments.	Support is noted.
Persimmon	<a href="#">LPPO1427</a>	Policy	Comment	Support aspirations of Policy 6B in terms of its	Comments noted. Agree that employment

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Homes Limited		6B		<p>approach to the location of new development.</p> <p>Concerned that the proposed approach to distributing development in Policy 6B is not reflected by allocations included within the emerging Plan.</p> <p>A number of proposed allocations are on existing employment land. Employment sites should not be allocated for residential development unless there is clear market evidence presented to demonstrate that the sites will not come forward for an employment purpose.</p> <p>We support the recognition that it is necessary to facilitate the delivery of sufficient accessible housing to meet objectively assessed needs. Necessary to ensure that proposed housing sites are in suitable and deliverable locations.</p>	<p>sites should not be allocated for housing where possible, but these particular sites had remained unused for a long period of time. As they were brownfield sites suitable for housing development they needed to come forward for housing. The NPPF Para 22 states: “Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed.”</p>
Gladman Developments Limited	<a href="#">LPP01342</a>	Policy 6B	Comment	<p>Gladman welcomes commitment to facilitate development to meet OAN but this should be at least the minimum requirement. <i>Aii</i> refers to delivery of 'sufficient' housing. This should be removed. Housing requirement should be based on assessment of need that fully reflect housing market area and requirements of NPPF/NPPG.</p> <p>Aiv- strategy should consider and seek to recognise the intrinsic character and beauty of the countryside in line</p>	Comments noted.



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				<p>with the core planning principles of NPPF rather than seeking to safeguard such areas.</p> <p><b>Avi</b> - urban focus of plan broadly reflects services and facilities provision. However, market towns and rural centres are also sustainable locations where development should be promoted inline with NPPF. This will help to maintain vitality of rural communities.</p> <p><b>C</b> - neighbourhood plans will need to be consistent with Local Plan as a whole and have a role to play in supporting district in meeting development needs in full.</p> <p>D - open countryside is defined as land beyond a development boundary where development should be strictly controlled. However, this is not consistent with presumption in favour of sustainable development and would restrict development coming forward on edge of settlements. The policy approach taken through the Plan should more closely follow the Framework’s emphasis on the need to recognise the intrinsic nature and beauty of the countryside as part of the wider consideration of sustainability (alongside other core planning principles), rather than an out of date approach of protecting the countryside for its own sake.</p> <p><b>Bewdley</b> - is highly sustainable and offers wide range</p>	

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				<p>of services as well as being close to Kidderminster's services and employment opportunities. Current plan seeks to deliver 10% of overall housing requirement to Bewdley. No explanation in emerging plan as to how housing has been allocated. No justification for level of Green Belt land proposed for release in Bewdley and whether this is enough to meet needs. Policy 6B seeks to meet local needs in Bewdley but proposed allocations would not do this. Bewdley Housing Study Report says affordable housing requirement over plan period will total 383 dwellings, whilst proposed allocations only total 251 dwellings. If the Local Plan fails to tackle affordable housing needs over the plan period current housing inequalities will get even worse for the next generation.</p>	
Persimmon Homes Limited	<a href="#">LPP01585</a>	Policy 6B	Comment	<p>Bewdley is named as a Market Town and is third in the settlement hierarchy, there appears to be a negative stance within the Plan for development within this area, being described as a settlement with “fewer services”. However, as Bewdley is named as a Market Town the Plan should be more positively worded in order to encourage the much needed growth which is required in the area.</p> <p>As the amount of brownfield land available has reduced the Council now needs to look at appropriately located sites so may need to adopt a more flexible approach towards greenfield sites if the</p>	Comments noted.

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				<p>OAN is to be met in full. As Bewdley is third in the settlement hierarchy it is necessary that development is undertaken and encouraged in this area.</p> <p>Within the Wyre Forest Settlement Hierarchy Technical Paper (2009) Bewdley was ranked very similarly to Stourport. Whilst Stourport received a score of 21 Bewdley was awarded a score of 20 which saw Bewdley have many of the same facilities as Stourport. However, whilst Stourport is in line to receive a significant amount of housing, Bewdley has been marginalised for growth. Due to the lack of potential development land within the District it is considered that a fresh approach needs to be taken for development in Bewdley in order to satisfy the local and wider need.</p>	
	<a href="#">LPPO1878</a>	Brownfield sites.	Comment	Run down areas with empty building, develop them such as The old law courts and Glades.	Comments noted. These sites are being considered.
	<a href="#">LPPO2592</a>	Policy 6B	Object	It is very important that every effort is made to use the considerable brownfield sites still available for development before greenfield sites are considered. Developers will always prefer to develop on green field land because it is easier and cheaper. However this is no reason to zone large areas of the Green Belt for housing just for this reason. Are there any existing industrial or retail areas that could be rezoned for high density housing? For example, Worcester Street in	<p>Objection noted.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District.</p>

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				<p>Kidderminster has ceased to become a viable retail zone and could be redeveloped for high density housing instead of poor quality shopping. The Crown House site in central Kidderminster could also be similarly rezoned for high density housing. Both these opportunities would go some way to revitalising the Town Centre especially at night and would be highly sustainable close to transport and other facilities.</p> <p>If Green Belt land is required for housing I reluctantly accept that land east of Kidderminster may be the best option as it is the closest to transport links to the economic hub of the West Midlands conurbation where most economic activity takes place. Locating development here will mitigate further traffic growth through Kidderminster. However, I feel that it is disingenuous to attempt to sell the Council's preferred options for housing development on the basis that they will fund a by pass for Kidderminster. The proposed road through the development is not a by pass but a single carriageway 40mph (at most) access road to the new development. What is really needed is a rejuvenation of previous proposals for a proper dual carriageway by pass starting from the Bewdley by pass and running south of Kidderminster and Blakedown to reach the A456/A491 island at Hagley. This would hugely improve access to Wyre Forest district and therefore the economic performance of the area.</p>	<p>We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p> <p>Transport modelling work is being undertaken to inform the final site allocations. This evidence based work will be made available at pre-submission consultation stage for public viewing on our website.</p>

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	<a href="#">LPPO3216</a>	6B Greenbelt	Object	<p>We DO NOT support development on existing Green Belt land when there are other options</p> <p>The Conservative party election manifesto promised "We will protect the Green Belt. We will ensure that brownfield land is used as much as possible for new development" How can this 'promise' be reconciled by Wyre Forest District Council's ruling Conservative Party? Yes, we need new housing to provide for our young people and people trying to get onto the property ladder - but NOT by decimating our Green Belt.</p> <p>The 'Call for Sites' - 'easy money' offered by developers to get their hands on Green Belt land.</p> <p>We urge Wyre Forest District Councillors to take on board the concerns.</p> <p>We appreciate that difficult decisions have to be made, but ask for you to balance such decisions with realistic future needs - development MUST only take place in the RIGHT places and Green Belt countryside should be a very last resort.</p> <p>Predictions for future growth are just that - no-one knows how demand for new housing will develop - will we see sprawling row upon row of empty or</p>	<p>Objection noted.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				ugly homes.	
	<a href="#">LPPO3587</a>	Policy 6B - Locating new development	Object	<p>Has the council thoroughly checked that brownfield sites have been identified and that these be used for development and that instead of offering green belt land to developers.</p> <p>Grade A agricultural land or any agricultural land and green belt, must never be built on, this land is very productive and employs many people during and before harvest, consider food miles and sustainability.</p> <p>Wild life will also suffer at the loss of their habitat.</p>	<p>Objection noted.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>
	<a href="#">LPPO3655</a>	Policy 6B	Object	<ul style="list-style-type: none"> <li>Green Belt, though not sacrosanct, is there for good reason – creeping urbanisation from the Birmingham conurbation only makes sense in <u>exceptional</u> circumstances.</li> <li>A requirement of the Local Plan is that development should be proportionate to the capacity of the district. The potential for around 4000 dwellings being built along this eastern corridor is surely disproportionate?</li> </ul>	<p>Objection noted.</p> <p>Comments noted. The housing requirement is based on the Objectively Assessed Housing Need (OAHN) study. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>The emerging Local Plan does include policies</p>

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				<ul style="list-style-type: none"> <li>The Provisional Local Plan states that there is virtually static population growth due to an ageing population and a higher proportion of residents being over 65. As well as a requirement for more care home places surely there is a need to look at the likely housing needs of an ageing population. Many may be looking to live near to amenities in the town centre – close to shops, transport etc. and not on housing estates on the periphery. Movement to the town centre would free up family homes and reduce the need for more ‘housing estate’ type of new builds.</li> <li>Young people coming into the area to work would also be attracted to town centre living with all facilities on their doorstep e.g. affordable housing in the form of town centre apartment</li> </ul>	<p>for affordable housing and will also look to provide a mix of housing types to cater for the needs of the community, i.e. 2 bed, 3 bed, 4 bed family homes. There will also be a C2 use requirement to cater for the needs of the elderly population.</p>
	<a href="#">LPPO2916</a>	Policy 6B	Comment	<p>Empty properties in Green Street and Worcester Street could be turned into apartments to provide affordable housing.</p> <p>The town needs to be regenerated to attract people to live in the area. There are a lot of empty shops and unemployment in the area.</p>	<p>Comments noted. Brownfield sites have been considered as part of the plan process – the site next to Tesco in Stourport is included in the Plan (AKR/20 – Carpets of Worth, and AKR/2 – Cheapside). The Sladen School (BW/3) site is also included.</p> <p>The council works with Empty Property owners</p>

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				<p>Also there is the old Sladen school site could also provide housing.</p> <p>The old Sarsons vinegar site could be used for housing as the road network is there and it is close to local amenities.</p>	<p>who want to bring properties back into use and would support conversion of units where it is appropriate to do so.</p>
	<a href="#">LPPO3366</a>	Policy 6B	Object	<p>The green belt plays a vital job in separating the town from the W.M conurbation. This land is highly regarded locally, as it supports much wildlife, birds, mammals and invertebrates including endangered species, hedgehog, skylarks etc. The impact on the habitat the impactand on the buffer zones for Hurcott and Podmore SSI's would be very damaging.</p> <p>Because we are a small town is doesn't mean that we need to spread so far into large areas of green belt. Open countryside is important to everyone, wildlife and the existing population. These areas are the green lung to eastern Worcestershire.</p>	<p>Objection noted.</p>
	<a href="#">LPPO4126</a>	6B	Object	<p>Any development to the west of the river Severn would carry such massive infrastructure costs.</p> <p>Creating approx 1000 new homes to the west of Stourport, must inevitably require a new Severn crossing. Currently going from the west, crossing the river at Stourport can easily take 30 minutes.</p> <p>The schools, Doctors and other requirements, must</p>	<p>Objection and comments noted.</p>



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				<p>surely make the whole concept run into many Millions.</p> <p>Increasing traffic would make the situation far, far worse.</p> <p>Population levels in Wyre Forest are below the national average. The same is true of housing stock, where prices have struggled to get near the national average increases over the past few years.</p>	
	<a href="#">LPPO3579</a>	Green Belt	Object	I would like to raise an objection to the use of green belt sites to build houses as there is insufficient jobs to sustain the number of people, and insufficient infrastructure to support them.	Objection noted.
	<a href="#">LPPO4133</a>	6B	Comment	<p>We are mystified by the total lack of explanation of the total failure to look into and comment on why the proposals have not included any land whatsoever to the north, south or the west of the town. Not bothering to mention these areas and the reasons for the omission shows a complete lack of regard for the electorate.</p> <p>Our initial comment is that developing towards Hartlebury would present no danger of linking the village to Kidderminster, this is certainly not the case with extending the town towards Blakedown and thence to Hagley.</p> <p>This is also clearly not a problem with extending</p>	Comments noted. Sustainable locations are sought when identifying site allocations in the emerging Local Plan. The site selection process is informed by a number of evidence base documents, which include the HELAA, Employment Land Review, Strategic Flood Risk Assessment, and the Green Belt study to name but a few. The Local Plan Review is also informed by the Sustainability Appraisal. A Site Selection Paper will also be published at pre-submission stage – this paper gives further details as to why some sites have been chosen as opposed to other sites.

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				towards Bridgnorth. This begs the question as to why one quarter of the town must bear the whole impact, whilst three quarters, with less danger of negative impact, are not even looked at.	
Anonymous	<a href="#">LPPO5093</a>	6B - Locating new development	Comment	<p>It would be naive to believe Kidderminster, Stourport &amp; Bewdley will not be forced at some point to build on Green Belt. I believe it would be constructive is to engage with Wyre Forest District Council about how the Green Belt land is developed in a more sensitive and thought through manner (i.e. not another Spennells stuck on the edge of the community increasing the already present traffic issues and meaning the location of existing services need to be moved rather than improved).</p> <p>See response LPPO5094 re types of dwellings – that could be spread out in more of a lane fashion retaining adjacent fields to be used for cycling, dog walking and the general enjoyment of the whole community. In terms of traffic, the lanes should access more than one major road. The hope would also be that the majority of target residents (65+) would not add to the existing morning commute traffic issues in the area as they are already retired, or over the next decade, would be reaching retirement age. This is not to say traffic would not increase in general, hence the reason for providing many routes to the major roads already in place.</p>	Comments noted.
Worcestershi	<a href="#">LPPO1085</a>	Site	Comment	With regards the specific sites proposed for allocation,	Comments noted and welcomed. We look

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re County Council, Planning Economy & Performance		allocations policy - Policy 6B		<p>we are concerned that we have been unable to identify a background evidence base or work to consider these sites in relation to green infrastructure or its constituent elements of landscape assessment, biodiversity, blue infrastructure or historic environment, whether individually or holistically. It is therefore difficult to assess the potential for the sites individually or collectively to deliver sustainable development or for the plan to meet the requirement of NPPF paragraphs 109 and 110.</p> <p>We recommend that ecological site assessment should be undertaken as early as possible in the planning process, prior to site allocation, and should be used to inform both the final site allocation and to develop a comprehensive and holistic approach to consideration of the impacts of the proposed development. The Worcestershire Green Infrastructure Partnership would welcome the opportunity to work with WFDC to develop a green infrastructure approach to site allocations within the plan, including desk based assessment and to discuss more detailed site assessment as appropriate.</p> <p>With regards to green infrastructure we support neither option A or B, but instead a hybrid approach which removes from the final allocation those sites which have significant environmental constraints upon deliverability. This should be informed by further work</p>	forward to working with WCC on this suggested approach.

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				<p>including desk based assessment. The final allocation should cohesively treat the remaining sites in a manner which will facilitate the sustainable development aspirations as set out within the Plan's vision for the area.</p> <p>We'd suggest this maximises the development quanta via the key strategic areas of: the East Kidderminster Corridor (including Option B); Urban Kidderminster and Stourport; the Kidderminster and Stourport Waterfront Sites; and the larger Lea Castle Complex (Options B).</p> <p>In order to realise the quanta of development within such a 'hybrid' approach, it will be necessary to cohesively treat groups of sites which naturally sit together. The advantages of this approach go beyond securing an ecologically functional landscape and would facilitate a quanta of growth required to trigger essential accompanying infrastructure as advocated by the Worcestershire Green Infrastructure Partnership.</p> <p>This approach would work well if each cohesive 'cluster' of allocations were supported by tailored Green Infrastructure Concept Plans designed to maximise the environmental benefits for each group of allocations. Additionally, this would help achieve the aspirations of Policy 14.</p>	
Stourport	<a href="#">LPPO1130</a>	Policy	Comment	Support a number of the aspirations of Policy 6B in	Comments noted. Agree that employment

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High School		6B Locatin g New Develo pment		<p>terms of its approach to the location of new development. However, concerned that the proposed approach to distributing development outlined by Policy 6B is not reflected by the allocations included within the emerging Plan.</p> <p>A number of the proposed allocations are on existing employment land. It is our view that employment sites should not be allocated for residential development unless there is clear market evidence presented to demonstrate that the sites will not come forward for an employment purpose.</p> <p>Support the recognition that it is necessary to facilitate the delivery of sufficient accessible housing to meet objectively assessed needs. As part of this, it is necessary to ensure that the proposed housing sites are in suitable and deliverable locations. In addition, if the housing requirement is to be met, it must be ensured that there is a sufficient variety of sites available to meet the needs of the market. Concerned that the Kidderminster allocations in particular will result in a market saturation on the eastern edge of Kidderminster. Such a significant amount of development in this location will not be deliverable during the course of the plan period as the market will not support the delivery rates required. Furthermore, housing should be distributed so that it reflects the settlement hierarchy..</p>	<p>sites should not be allocated for housing where possible, but these particular sites had remained unused for a long period of time. As they were brownfield sites suitable for housing development they needed to come forward for housing. The NPPF Para 22 states: “Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed.”</p>

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Worcestershire County Council, Planning Economy & Performance	<a href="#">LPO1133</a>	Policy 6B - Locating New Development	Comment	The Worcestershire Archive and Archaeology service has no specific comments regarding the site allocations. A brief examination of the proposed allocations against the Worcestershire Historic Environment Record suggests that none of the proposed allocations would directly impact upon a designated heritage asset. On this basis any issues regarding the presence/absence of any undesignated heritage assets of archaeological interest, and any design or mitigation works that may be required as a consequence, could be dealt with as part of the normal planning and development process.	Comments noted. A Heritage Impact Assessment evidence base study has been produced to inform the pre-submission plan and will be published for the pre-submission consultation.
Kidderminster Civic Society	<a href="#">LPO1166</a>	Policy 6B - re-use of brownfield	Support	Supports the re-use of brownfield sites, thus reducing the need to use Green Belt.	Support is noted.
Kidderminster Civic Society	<a href="#">LPO1167</a>	Policy 6B - Locating New Development	Comment	Suggest that the new housing requirements would best be distributed over the three towns and outer areas.	Comments noted.
Wyre Forest District Council - Development	<a href="#">LPO1204</a>	Policy 6B	Comment	Within table 6.0.2, under both Kidderminster & Stourport there is a bullet point that simply reads "Utilisation of appropriate brownfield and greenfield sites". Does this require further clarification, as this	Comment noted. This will be considered in policy update.

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t Control				implies that any development (housing/commercial/retail) might be appropriate.	
Taylor Wimpey West Midlands	<a href="#">LPPO1468</a>	Policy 6B	Comment	<p>The principles, upon which the Development Strategy is based are sound. The principles align to the delivery of the overarching Vision and the Plan’s Aim and Objectives, ensuring the delivery of homes, jobs and focusing development to the most accessible locations whilst having regard to the provision of infrastructure.</p> <p>Kidderminster is identified as the ‘Main Town’ within the District. As the highest order settlement within the District, its role as the administrative centre of the District and focus for public services and employment is supported.</p>	Comments noted.
Hurcott Village Management Committee	<a href="#">LPPO1630</a>	Policy 6B - Locating New Development	Comment	A requirement of the Local Plan is that development should be proportionate to the capacity of the district. The potential for around 4000 dwellings being built along this eastern corridor is surely disproportionate when compared to the required 5100 homes predicted requirement for 2034?	The NPPF Para 6 states: “The purpose of the planning system is to contribute to the achievement of sustainable development.” There are three dimensions to sustainable development: an economic role, a social role, and an environmental role. As Kidderminster is the main town for the District and is served by a railway station with trains running to Worcester, Birmingham and London, it is considered to be the most sustainable location for future development.
Wyre Forest Community	<a href="#">LPPO1647</a>	Policy 6B	Support	We support the principles set out in the policy, but emphasise the need to bring forward schemes in	Support is noted.

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
Housing				villages and rural areas. This would support us to be more proactive in meeting the rural housing needs across the District.	
	<a href="#">LPPO1941</a>	Brownfield Use	Comment	Please use brown building sites first even if they are more difficult and expensive to develop. Is it possible to use sites such as Lea Castle, Sladen School, Crown House, and the site of the old swimming pool? Also use fill-in sites for smaller pockets of development that have less impact on surrounding areas.	Comments noted.
Victoria Carpets	<a href="#">LPPO1499</a>	Policy 6B	Comment	The principles underpinning the development strategy and the site allocations in the emerging Plan are in accordance with the NPPF in relation to supporting economic development, creation of accessible housing and effective provision of infrastructure.	Comments noted.
Stanmore Properties Ltd	<a href="#">LPPO1505</a>	Policy 6B	Comment	Kidderminster as focus for development is supported. Kidderminster has the greatest housing need, easy access to the most extensive range of services and facilities and the provision of infrastructure and cost of public service delivery is low. In addition, Kidderminster is well connected by public transport, notably train, to higher order settlements of the conurbation.  Growth should be focused in the most sustainable locations in accordance with the Core Planning Principles set out in paragraph 17 of the NPPF. This	Comments noted.



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				<p>supports:</p> <ul style="list-style-type: none"> <li>• the transition to a low carbon future, taking account of flood risk, encouraging the reuse of existing resources;</li> <li>• encouraging the effective use of land that has been previously developed;</li> <li>• actively managing patterns of growth to make fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.</li> </ul> <p>The main towns, particularly Kidderminster offer the most sustainable option for growth.</p>	
Offmore Comberton Action Group - Local Plans	<a href="#">LPPO1569</a>	Policy 6B	Comment	Whatever final sites are decided we believe that NO land should be released from the existing confirmed Green Belt (i.e. excluding previous ADR sites) until ALL Brown Field sites have been developed.	Comments noted.
Summerfield Against Land Transformation	<a href="#">LPPO1612</a>	Policy 6B	Comment	<p>We reject the hierarchy of settlement argument as unfair and disproportionate, a fairer and more imaginative approach is required.</p> <p>The plan contains many underlying assumptions which we challenge. The settlement hierarchy has face validity in terms of population distribution but your proposals result in some 77% (Option A) or 61% (Option B) of the proposed housing development</p>	Comments noted. Sustainable locations are sought when identifying site allocations in the emerging Local Plan. The site selection process is informed by a number of evidence base documents, which include the HELAA, Employment Land Review, Strategic Flood Risk Assessment, and the Green Belt study to name but a few. The Local Plan Review is also informed by the Sustainability Appraisal. A Site

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				falling upon Kidderminster and its environs. This is an unfair distribution and undue burden on the population. This approach is further justified by the limitations imposed by the rivers and canal that flow through the District. Whilst these features do pose challenges to development they do not, in our view, exclude development, or, justify the scale and distribution of development you propose in Option A.	Selection Paper will also be published at pre-submission stage – this paper gives further details as to why some sites have been chosen as opposed to other sites.
Taylor Wimpey West Midlands	<a href="#">LPPO1716</a>	Policy 6B	Comment	<p>The principles, upon which the Development Strategy is based are sound. The principles align to the delivery of the overarching Vision and the Plan’s Aim and Objectives, ensuring the delivery of homes, jobs and focusing development to the most accessible locations whilst having regard to the provision of infrastructure.</p> <p>Stourport-on-Severn (including Areley Kings) is identified as a ‘Large Market Town’ within the District. As the second highest order settlement within the District, its role in supporting the provision of large scale housing is supported.</p>	Comments noted.
Spennells Against Further Expansion	<a href="#">LPPO1738</a>	Policy 6B - Locating new development	Object	<p>When using the SNNP figures of 199 p.a. there is sufficient brownfield land (including previously developed land at Lea Castle) and Greenfield land available to meet the 15 year land supply (2985) without the need to use Green Belt at all.</p> <p>Kidderminster town centre has at least 40 large shops and office blocks that stand empty, some for well over</p>	It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield

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				<p>a decade. Compulsory Purchase Orders should be made on some of the larger shops that stand no chance of ever being filled due to their size. There are also sites at Sladen School and Sion Hill School. Why are there plans for a cinema on the old Glades site when WFDC claim that land for housing is the priority.</p> <p>WFDC could request Government action in order to encourage Developers in the local area who have been given planning permission to build houses within a reasonable time frame, not just to sit upon Land Banks for speculative purposes e.g. Cheapside in Stourport (AKR/2) and Sladen School.</p> <p>Stourport also has a number of brownfield sites which are in need of development. The now defunct Wyre Forest golf course has released some land and there is no reason why the rest should not be released for housing development.</p> <p>Brownfield regeneration <b>MUST</b> take priority over the development of Green Belt. We contest that there is any need to build on Green Belt within the next 15 years of the plan, and therefore no Green Belt review or land (except Lea Castle) is required for housing.</p>	<p>sites to be able to meet our housing requirements. This will include some greenfields sites within the Green Belt.</p> <p>The sites referred to have already been considered and suggested as potential allocation sites in the emerging Local Plan, i.e. Sladen School site (BW/3), Sion Hill School site (WFR/WC/18), Cheapside (AKR/2) and Carpets of Worth (AKR/20).</p>
	<a href="#">LPPO1854</a>	Policy 6B Brownf	Comment	Consider brownfield sites like large building in the town centre rear of Matalan that has been empty for years before greenbelt land is used	Comments noted.

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		ield Sites			
	<a href="#">LPPO1912</a>	Brownfield sites	Comment	There are Brown field sites available which could cater for a more accurate assessment of the real housing needs plus Kidderminster town centre has empty shops/offices/building which could provide the required need.	Comments noted.
	<a href="#">LPPO1948</a>	Development	Comment	<p>Many people will object on the important ecological grounds. Everyone talks about global warming and we talk about destroying the countryside. It seems like a ploy to get funding for an eastern bypass, with no thought to wildlife.</p> <p>My major concern relates to the amount of traffic on the A456 to Birmingham. If you currently travel at rush hour, you will understand the problem. Not understanding means that your alternative will be to do so before confirmation of the options is completed.</p> <p>The irony of the whole situation is that we are not allowed to have a mobile phone mast at the bottom end of Offmore Farm, but you can contemplate these measures.</p> <p>School places are already under pressure. Appointments with the doctors, likewise. Fire services are down to a minimum and parking is already at a</p>	Comments noted. Transport modelling is being undertaken to help inform the site selection for the pre-submission version of the emerging Local Plan. The Infrastructure Delivery Plan (IDP) is also being produced alongside the Local Plan. The IDP sets out the infrastructure requirements for the emerging Local Plan.

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				premium.  Sounds like a well thought out plan.	
	<a href="#">LPPO3320</a>	Policy 6B	Comment	Removal of potential employment sites will add to the significant loss of employment through out the area. Stourport has had no improvements in infrastructure despite the current increase in population of in excess of 10% including both sides of the river. These proposals will increase the population by a further 10% over current numbers still with no infrastructure improvements. It will become a dormitory town with no access to major roads, railway or dependable bus services. The whole area will become a point from which people will travel elsewhere for work.	An Employment Land Review study has been undertaken to inform the Local Plan. Transport Modelling is also being undertaken to inform the final site allocations. This evidence based work will be made available at pre-submission consultation stage for public viewing on our website.  The Infrastructure Delivery Plan (IDP) is also being produced alongside the Local Plan. The IDP sets out the infrastructure requirements for the emerging Local Plan.
	<a href="#">LPPO3443</a>	Locating new development	Object	Building all of these houses will cause major environmental damage over the upcoming years.  Some of the sites proposed are very near SSSI's (sites of scientific and special interest e.g. sites near Hurcott). They will also be threats to public rights of way.  Adding more people to the communities will push GP surgeries.	Objection noted.  The Infrastructure Delivery Plan (IDP) is also being produced alongside the Local Plan. The IDP sets out the infrastructure requirements for the emerging Local Plan.

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				<p>Schools are at full capacity.</p> <p>It will strip us of our near countryside.</p>	
	<a href="#">LPPO2420</a>	Policy 6B	Object	<p>Can I please register my objection to the proposed planning local plan review on the following basis;</p> <p>1/ Building on a greenfield site is nothing short of environmental destruction. At a time when the UK numbers of wildlife are falling at a dramatic rate, to further add to this growing trend of removing habitat would be a crime to future generations. Once done, there is no going back. If houses need to be built, brownfield sites should be the limit of further intrusion into our beautiful countryside.</p> <p>2/ The area of the Wyre Forest is already suffering from too much traffic and constant delays, to add to this is simply burying one's head in the sand.</p> <p>3/ This is clearly purely a scheme to make money for the few to the detriment of the most.</p> <p>4/ The services of the area are at breaking point, the time has come to say no more to large scale developments of this kind</p>	<p>Objection noted.</p> <p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfields sites within the Green Belt.</p> <p>The sites that were considered as part of the Local Plan Review process can be found in the Housing &amp; Economic Land Availability Assessment (HELAA) document. The Site Selection Paper also provides detail on the process taken.</p> <p>Transport modelling is being undertaken to help inform the site selection for the pre-</p>

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				<p>5/ One of the key strengths of the area is of its outstanding natural beauty, why would you wish to take away what we have?</p> <p>6/ The residents of Wyre Forest are speaking, they do not want this. You are here to serve the wishes of the electorate.</p> <p>I have the following questions that do not appear to be in the public domain;</p> <ul style="list-style-type: none"> <li>• Exactly where were the brownfield locations that were considered and rejected? Is the commercial value of the proposed land development the main driver behind these plans. Presumably there will be considerable profit to build on these sites, please advise the figures and individuals who will benefit from these proposals.</li> <li>• It is clear to all that the existing infrastructure cannot support the current demand. Kidderminster, Stourport and Bewdley roads are often grid locked and burdened with too much demand. These problems should be resolved and increased for further demand before even more strain is even considered. To suggest an eastern relief road will not only ease the existing problems but accommodate further traffic is laughable. What are the short,</li> </ul>	<p>submission version of the emerging Local Plan. The Infrastructure Delivery Plan (IDP) is also being produced alongside the Local Plan. The IDP sets out the infrastructure requirements for the emerging Local Plan.</p> <p>Ecological appraisals and Green Infrastructure Concept Plans have been prepared to inform the pre-submission Plan. There are also GI policies within the emerging Local Plan.</p>

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				<p>medium and long term plans to solve the traffic issues of the district?</p> <ul style="list-style-type: none"> <li>• Schools, hospitals etc are also at breaking point. The plan appears just to add more burden in order to tick a Government housing requirement box.</li> <li>• What plans are there in place to support, improve and protect the local environment? In the last 40 years plus, wildlife numbers have nose dived, habitat lost and there are now more red listed wildlife species then ever before. What is being done to halt this decline and reverse it?</li> <li>• What plans are in place for future housing developments? Bird boxes should be required to be built into the brick, corridors of hedgerow for wildlife movement incorporated into the plans. Trees / ponds, meadows and fruit bearing shrubs should all be required to be incorporated into any developments. The answer that this cannot be afforded is wrong, it is in fact that we cannot afford not to reverse the trends and errors of the past. What plans for new trees to be planted, areas restored for wildlife?</li> </ul> <p>You need to plan for today, tomorrow and the next 50 years. The plan appears to be for today and then lumber the problems this creates onto future</p>	



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				<p>generations.</p> <p>Solve the current problems first and then plan to benefit all (including our natural environment).</p> <p>You have an opportunity to lead, don't follow the past and repeat the same mistakes. I see no vision for the next 30-50 years.</p> <p>Let's have proper visibility, no smoke and mirrors. We require honesty, clarity and true long term planning.</p>	
	<a href="#">LPPO2604</a>	Locatin g new develo pment	Comment	<p>When deciding where to build the new houses, special regard should be taken of the social and employment needs of the people who will be living in the new houses and these fall into two categories.</p> <p>Category one: those people who choose to live in the Wyre Forest but their employment is within the surrounding towns and cities.</p> <p>Category two: those who do not work, or choose to walk, cycle or use public transport to get to work.</p> <p>For those who fall into category one, and we believe this is the vast majority of the adult population, it is essential that their houses are built within easy access of the major arterial roads of the A449 (North), A451,A456, A448, A442 and the A449 (South). It is</p>	Comments noted. Transport modelling work is being undertaken to inform the final site allocations. This evidence based work will be made available at pre-submission consultation stage for public viewing on our website.

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				essential that they are not built in areas that will cause extra traffic to be routed through the known major congestion areas of the Wyre Forest, such as Stourport: Gilgal/Mitton Street, Burlish Crossing, Vale Road and Kidderminster: Foley Park and Bewdley Hill.	
	<a href="#">LPPO3380</a>	Policy 6B	Object	<p>The green belt land plays a vital role in separating the town from the West Mids conurbation, it is home to many bird/animal and invertebrate species, including endangered and priority species: hedgehog, small tortoise shell butterflies, skylarks, corn bunting, house and town sparrows, starlings to name a few. The impact on wildlife habitats on the buffer zones for Hurcott and Podmore SSIs would be tremendously damaging in a time when we are trying to maintain and increase wild habitat recovery.</p> <p>Sir David Attenborough, who wrote the foreword to the State of Nature report, said: “The natural world is in serious trouble and it needs our help as never before. We continue to lose the precious wildlife that enriches our lives and is essential to the health and well-being of those who live in the UK.” I believe these proposals negate this.</p>	Objection noted.
	<a href="#">LPPO4050</a>	Locating development	Object	The allocation of housing in the two “preferred options” provide Stourport with a choice of either a 10% (Option A) or 20% (Option B) rise in population by 2034 — some choice! Whereas the equivalent figures for Kidderminster are 8% & 7% and for Bewdley 5% &	Objection noted. As the District’s strategic centre and the largest town within the district, it is the most sustainable location for future housing growth.

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				<p>8%.</p> <p>The overall figures for Wyre Forest are under 6% for both Options. This is a totally unfair allocation and would result in infra-structure problems in Stourport where the current roads and bridge are already over stressed.</p>	
	<p><a href="#">LPPO4194</a></p>	<p>Planning decisions/options</p>	<p>Comment</p>	<p>Planning decisions/options should be informed by the following principles, a number of which I recognise are implicit if not explicit in the options you offer:</p> <ul style="list-style-type: none"> <li>• The individuality/personality of the three towns in the District must be sustained and protected.</li> <li>• The existing and in some cases already diminishing/threatened/remaining open space between the must be protected.</li> <li>• No greenfield sites should be considered/built on when brownfield/derelict sites are still available (e.g Power Station land adjacent to Tescos in Stourport, Timber Yard by canal in Kidderminster, Workhouse site, part of Dog Lane site in Bewdley etc.)</li> <li>• Empty/underused retail spaces in centre of towns should be converted into housing.</li> <li>• The capacity of Kidderminster to support additional housing/population e.g in relation to availability of brownfield sites/proximity to often underused and therefore vulnerable</li> </ul>	<p>Comments noted. Brownfield sites have been considered as part of the plan process – the site next to Tesco in Stourport is included in the Plan (AKR/20 – Carpets of Worth, and AKR/2 – Cheapside). The Timber yard site in Kidderminster is also included (BHS/16 – Timber Yard).</p> <p>The council works with Empty Property owners who want to bring properties back into use and would support conversion of units where it is appropriate to do so.</p>

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				retail capacity and main line rail links is greater than that of the other two towns. Keeping additional housing close to existing transport and underused retail capacity would also reduce pollution/traffic congestion across the Wyre Forest District.	
	<a href="#">LPPO4471</a>	Churchill and Blakedown	Comment	No sites in Churchill & Blakedown were put forward in the Call for Sites.  The Churchill & Blakedown Neighbourhood Plan only provides for small scale housing to meet identified local need.	Comments noted.
	<a href="#">LPPO4746</a>	Policy 6B	Comment	This consultation has not been in my opinion unbiased or transparent. I do not see why Wolverley, Chaddesley Corbett, Blakedown along with other outlying areas have not been included.	Comments noted.
	<a href="#">LPPO4899</a>	Policy 6B	Comment	It is stated in the plan that there is virtually static population growth, with an ageing population, and a high proportion of residents being over 65. As well as a requirement for more care home places, surely there is a need to look at the likely housing needs of this ageing population, I would suggest that many of these would be looking to live in a town centre, close to shops and transport facilities, and not on housing estates on the periphery. Movement to the town centre would free up homes for families and lessen the	Comments noted. Housing provision in the town centre is being considered as part of the Local Plan Review process. We also have an emerging Policy on housing for older people.

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				need for more 'housing estate' new builds. Likewise young people coming to the area to work would also be attracted to living in a town centre with all facilities on their doorstep. There would obviously be a higher density than that provided on a housing estate, negating the need for committing so much Green Belt land for development.	
	<a href="#">LPPO3712</a>	6C	Comment	COMMENT ON Policy 6C  We do not believe there is evidence to support Kidderminster as the 'tourist hub' for the area; Bewdley and Stourport are the tourist attractions in the Wyre Forest.	Agree with these comments. The emerging Local Plan does recognise Bewdley and Stourport as having important tourist attractions also.
Summerfield Against Land Transformation	<a href="#">LPPO1622</a>	Town Centre Regeneration	Support	We support Wyre Forest DC's ambition to develop and regenerate Kidderminster town centre. This is best served by building in and close to the town centre, promoting the use of sites such as The Glades, Crown House and the Park Lane timber yard. This would address housing need, revitalise the town centre and offer opportunity for small businesses.	Support and comments noted. The former Glades site and the Timber yard site are already included as possible site allocations. There are also future plans for Crown House which the Council's Economic Development & Regeneration team are exploring.
Taylor Wimpey West Midlands	<a href="#">LPPO1472</a>	Policy 6C	Support	Kidderminster's role as the strategic centre of the District is supported. As the existing 'centre' for commercial, employment, retail, office and leisure facilities it is the most sustainable location for meeting future housing needs.  The reference to sustainable urban extensions to	Support and comments noted.

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				Kidderminster are welcomed and considered necessary to ensure the sustainable growth of the town and to support future commercial and leisure development to support Kidderminster’s role as a strategic centre, promoting the town as a tourism ‘hub’ and assisting in the creation of a diverse evening/night time economy.	
West Midland Safari Park	<a href="#">LPPO1325</a>	Policy 6C	Comment	<p>Generally support the general essence of this policy, particularly in relation to seeking sustainable transport links and infrastructure to promote ease of access to among other places, West Midland Safari Park. However, we object to the policy as currently drafted, and request that it be amended to more closely reflect paragraph 32 of the National Planning Policy Framework.</p> <p>The policy as presently drafted gives rise to the possibility that the transport links and infrastructure will be in part or wholly funded by developer contributions in the absence of a CIL charging schedule. Such an approach should be proportionate to the scale of the impact on the transport network, and the viability of the scheme for which contributions are sought should be a key consideration in the determination of planning applications. The last sentence should therefore be amended as follows: “Where the residual cumulative impacts of development are severe, sustainable transport links and infrastructure to promote ease of access to the</p>	<p>Objection noted.</p> <p>The Infrastructure Delivery Plan (IDP) is also being produced alongside the Local Plan. The IDP sets out the infrastructure requirements for the emerging Local Plan.</p>

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				Wyre Forest, Stourport-on-Severn, Bewdley, West Midlands Safari Park and Kidderminster Railway Station will be sought, where practical and viable.”	
Kidderminster Harriers Football Club	<a href="#">LPPO933</a>	Policy 6C	Comment	Additional text; This includes the provision of supporting facilities such as <u>sports</u> , hotels, conferencing facilities and developments that improve the evening / night time economy and cultural offer of the town.	Comments noted.
Miller Homes	<a href="#">LPPO928</a>	Policy 6C	Support	<b>Support</b> Policy 6C for Kidderminster to be the strategic centre for the District and for Kidderminster’s role in providing a focus for new housing, commercial, employment, retail, office and leisure development to be enhanced, including through the use of sustainable urban extensions.  The Local Plan Review Preferred Options consultation document identifies that Wyre Forest District Council (WFDC) considers that “ <i>the urban areas of the District have the greatest housing needs and are the locations where the cost of public service delivery is relatively low</i> ” <sup>1</sup> . Kidderminster is the largest settlement (urban area) in the District and already plays an important role in providing a considerable quantum of retail, leisure and employment uses, along with mainline rail links. It is also noted that the WFDC Settlement Hierarchy Technical Paper proposes that Kidderminster is classified as a Strategic Centre <sup>2</sup> , at the top of the District settlement hierarchy, and accordingly is	Support and comments noted.

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				considered to be the most sustainable settlement in the District3. It is therefore entirely appropriate for Kidderminster to continue to be the focus for the majority of the additional housing growth and other uses required to meet the needs of the District over the next plan period, which in turn will also support the vitality and viability of the town.	
Gladman Developments Limited	<a href="#">LPPO1343</a>	Policy 6C	Support	Gladman support the broad intention for Kidderminster to be a focus for regeneration and new development. However, this should not be at expense of the sustainability of other settlements. It is vital that the delivery expectations across the portfolio of previously developed sites and urban extensions is suitably evidenced in order to support the preparation of a realistic housing trajectory to accompany the Local Plan and demonstrate the availability of a robust housing land supply. Intention to further develop sustainable transport links between Kidderminster / Kidderminster railway station and other settlements such as Stourport and Bewdley is welcomed.	Support and comments noted.
Gemini Properties	<a href="#">LPPO1193</a>	Policy 6C	Comment	generally supportive of policy as it supports growth of Kidderminster as strategic centre and aspires to regenerate sites within and adjacent to the centre. Policy seeks to make Kidderminster a tourism hub and encourage overnight stays. in order to do this, the retail and leisure offer needs to be enhanced. A flexible approach to site development in and around the centre should be taken.	Comments noted.



**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 6: A SUSTAINABLE FUTURE –  
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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
	<a href="#">LPPO130</a>	6c	Comment	Supportive of development plans for Kidderminster being linked to improving access to the town centre - links to Paragraph 5.4.iii (making travel easier around the area generally for non car owners) and health improvement. Currently access on foot to the town from the North and East via Blackwell Street, Birmingham Road or Comberton means using subways which feel unsafe, unpleasant and do nothing to promote Kidderminster as a place to visit or work in.	Comments noted.
	<a href="#">LPPO4493</a>	6.19 Kidderminster Town Centre	Comment	<p>Believes that Kidderminster is not an attractive town due to the following reasons:</p> <ul style="list-style-type: none"> <li>• The monstrosity of Crown House together with empty shops, broken windows, broken beer bottles in the street gives the impression of an impoverished slum town. The money spent on opening up Worcester St must be spent on taking Crown House down. Is this building to be left until it is unsafe?</li> <li>• Empty shops will never be occupied by retailers unless large incentives offered by the Council do not encourage visitors.</li> <li>• Town centres will never be what they were 50 years ago. There is nothing in Kidderminster to attract young people to shop, they shop mostly on line and in shopping malls. They are only attracted to pubs and coffee shops.</li> <li>• Depressing grey paving outside the Town Hall</li> </ul>	Comments noted. Kidderminster town is the main town for the District and is a focus for regeneration and new development in the plan.

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				<p>and shared space, is not attractive and does not complement some very nice brick buildings in Vicar St. "record" seats already look as if they have been in situ for the past 30 years!</p> <ul style="list-style-type: none"> <li>• Drunken behaviour throughout the day is intimidating</li> <li>• Empty and broken beer bottles littering pavements; smashed windows</li> <li>• Green Belt land should be there for the health and well being of residents. The nation is becoming more obese, not helped by Councillors and planners agreeing to more "Take Aways" and "Coffee Shops" We should be encouraging private enterprise.</li> <li>• We worry about obesity in the young and pollution but the Council allowed a drive in coffee shop .</li> <li>• The area where the coffee shop and Kentucky Fried Chicken have been built should have been for accommodation</li> </ul>	
Taylor Wimpey West Midlands	<a href="#">LPPO1474</a>	Policy 6D	Support	<p>Urban extensions at Kidderminster are supported as insufficient amount of sustainably located, readily available land within the town, to support the necessary level of development growth to meet the objectively assessed housing and employment needs.</p> <p>Taylor Wimpey has significant land interests within the</p>	Support is noted.

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				proposed 'East of Kidderminster' Urban Extension and would welcome ongoing proactive discussions with the District Council in bringing forward these land interests within the Plan period.	
Stourport High School	<a href="#">LPPO1131</a>	Policy 6D Kidderminster Urban Extensions	Comment	Policy 6D is superfluous as there is a specific policy (Policy 31) that provides guidance on the Kidderminster's proposed urban extensions. Our response to Policy 31 should be read in conjunction with this representation.	Comments noted.
Worcestershire Wildlife Trust	<a href="#">LPPO1032</a>	Policy 6D Kidderminster Urban Extensions	Object	We have significant reservations about Section ii of this policy. There are likely to be considerable adverse ecological impacts associated with the proposed allocations to the east of Kidderminster and additional work to understand these will be required prior to finalising the allocations here. In particular the likely impact of development on designated sites including Hurcott and Podmore Pool Site of Special Scientific Interest (SSSI); Captains and Stanklyn Pools, Spennells Valley and Hoo Brook Local Wildlife Sites (LWS); and species of principle importance listed under Section 41 of the NERC Act 2006, including Corn Bunting, Hornet Robberfly and Tower Mustard, must be fully	Objection noted. Ecological appraisals of sites have since been undertaken to help inform the final site selection process. We have also worked with the Green Infrastructure Partnership who has since prepared a number of Green Infrastructure Concept Plans, including a GI Concept Plan for the eastern corridor area.

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				<p>understood prior to allocation of any of the sites set out in the consultation. So far as we can ascertain no such information has been used in the decision-making process to date and so we are concerned that the allocations may be unsound. Whilst mitigation for some of the biodiversity issues may well be possible it will require land take that is likely to have implications for the net developable area (and accordingly the number of dwellings allocated) set out in the plan. Rigorous consideration of this is essential and we cannot find anything in the evidence base to suggest that this has been undertaken to date.</p> <p>This is a particular problem to the east of Kidderminster because the designated sites in question generally run in an east-west orientation and so the impact of the proposed eastern relief road (shown on the Proposals Map) will be particularly severe unless significant mitigation can be put in place. A clear understanding of the need for the road and the costs associated with mitigation will therefore be important considerations if a meaningful assessment of the two proposed plan options are to be undertaken. Given the high degree of corridor severance likely to be caused by the indicative relief road route we would strongly advocate that it be deleted from the plan and a reduced level of development brought forward in this part of the district. It follows that for this area Option B appears to be the less harmful option but as yet we do</p>	

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				<p>not believe there is sufficient clarity to fully inform that decision. Given the very significant environmental issues likely to arise from the relief road it may be better to seek alternative access arrangements, including improvement to the existing network of local roads, to serve a reduced quantum of development in this area.</p> <p>Regardless of the final Option chosen in this area we would strongly recommend that allocations here are grouped together and that the council works closely with the Worcestershire Green Infrastructure Partnership to deliver an overarching Green Infrastructure Concept Plan for the area so that the extension to eastern Kidderminster achieves the best GI outcomes possible. We would be pleased to discuss this further with the council if that would be helpful. Please see our response in relation to paragraphs 6.54 – 6.56 and Policy 31 for further comments on the matters set out above.</p>	
Gladman Developments Limited	<a href="#">LPPO1344</a>	Policy 6D	Support	Gladman acknowledges role that strategic sites such as urban extensions can play in contributing to development needs. However, it is essential that well developed assumptions are applied when determining timing and extent of delivery that are expected to be achieved over the plan period.	Support is noted.
Persimmon Homes	<a href="#">LPPO1439</a>	Policy 6D	Object	Elements of Option A are to be preferred as will achieve the most benefits in terms of infrastructure	Objection noted.

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Limited				<p>provision and will enable the entire Kidderminster East expansion to be planned as a comprehensive basis. For this reason Option A should be included in its entirety.</p> <p>Some elements of Option B may be deliverable, to provide continuity of supply, but does not favour the Lea Castle site or its proposed extension. Have commented on other sites which should be excluded from the plan for policy, technical and environmental reasons. Option A should be included together with those elements of Option B which are not objected to. The sites can contribute to the increased housing requirement which will be needed to meet the overspill requirement from the Black Country and Birmingham.</p>	
Churchill and Blakedown Parish Council	<a href="#">LPPO1022</a>	Policy 6D	Comment	Only one proposed site in the Parish (employment site at Hodge Hill) so proposals not wholly in conflict with Neighbourhood Plan (July 2017). However, serious concerns re traffic implications of proposed developments, especially core sites proposed east of Kidderminster.	Comments noted.
Miller Homes	<a href="#">LPPO949</a>	Policy 6D	Support	Support the principle of an urban extension to the east of Kidderminster. Whilst it is recognised that the proposed composition of the urban extension(s) to Kidderminster is not yet fixed, due to the fact that there is a choice between Option A and Option B sites within the consultation document, our client supports	Support is noted.

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				the approach set out for having a number of key Core Sites which will form the basis of the urban extension(s) irrespective of which additional Option sites are chosen. As part of this process, and for the reasons set out in the response to proposed Policies 7 and 31, our client also endorses the decision to include the Hurcott Area of Development Restraint (ADR) as one of the Core Sites.	
Barratt Homes West Midlands	<a href="#">LPPO770</a>	Policy 6B	Comment	Policy 6D is superfluous given that there is a specific policy included within the plan (Policy 31) that provides guidance on the Kidderminster’s proposed urban extensions. We consider the proposed urban extensions to be inappropriate. See response to Policy 31.	Comments noted.
Homes England	<a href="#">LPPO801</a>	Policy 6D	Comment	Policy 6D proposes two urban extensions at Kidderminster to deliver a significant proportion of the housing required for the Town. One of these is the former Lea Castle Hospital site, which the HCA supports. Redevelopment of this brownfield site will deliver up to 600 new homes, employment and community facilities, providing publically accessible open space. The site is within the Green Belt, but it is a brownfield site, and its redevelopment would better use of the site, which currently lies redundant and in a derelict state.	Comments and site options noted.

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				<p>The site is in a sustainable location on the north-eastern edge of Kidderminster, providing good access into the Town and surrounding areas. The site is enclosed by woodland, its redevelopment would not harm the character of the landscape. The inclusion of this site as a proposed urban extension and a core housing site, and inclusion of the site within the Council’s housing supply, is supported. The site is available for development and a planning application has been submitted for its redevelopment.</p> <p>The second urban extension is ‘East of Kidderminster’. It is noted that the composition of this urban extension is to be determined through this Preferred Options consultation. It is considered that further development around the former Lea Castle Hospital would provide an appropriate location for further large scale development, such as land to the east of the hospital site, included as potential housing site Lea Castle Hospital Extension (East) under Option B. High level technical work has been undertaken in relation to this site to demonstrate how the site could be developed for around 360 dwellings. This is set out in the accompanying Supporting Document which is to be read in parallel with this representation. It should also be noted that the HCA owns the land to the west of the Lea Castle Hospital site which could also support the Council’s objectives of delivering housing should the Council consider the site to be appropriate for</p>	



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				development.	
Campaign to Protect Rural England	<a href="#">LPPO924</a>	Table 6.0.6	Object	We accept the need for the main part of the Lea Castle Hospital site to be redeveloped but question need for other substantial urban extensions.	Objection noted.
Sport England	<a href="#">LPPO210</a>	Policy 6D - Kidderminster Urban Extensions	Comment	The ex hospital site at Lee Castle includes an existing playing field. Whilst the live planning application aims to protect that playing field as part of the scheme no evidence is provided to show this is adequate to meet the needs of new residents and no ref. has been made to the forthcoming PPS. Both protecting existing and providing new playing fields to ensure there is sufficient supply of playing fields needs addressing in the light of the PPS.  There appears to be no playing field issues relating to East of Kidderminster	Comments noted. An Open Space Study, Playing Pitch Strategy, and Indoor & Built Facilities Strategy has been published and will be updated for the pre-submission consultation.
	<a href="#">LPPO296</a>	6D	Support	Generally supporting this policy as most employment for residents likely to be on the East and North sides of the district.	Support is noted.

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	<a href="#">LPPO297</a>	6E	Support	Support for Policy 6E.	Support is noted.
Sport England	<a href="#">LPPO211</a>	Policy 6E - Role of Market Towns	Comment	Cross ref. to the PPS should be made to ensure sufficient protection/provision of outdoor sports facilities.	Comment noted.
Campaign to Protect Rural England	<a href="#">LPPO932</a>	Policy 6E	Comment	The policy is generally unobjectionable. However we would question the appropriateness of some of the urban extensions proposed for Stourport and Bewdley. These are dealt with in our site-specific comments.	Comment noted.
Bewdley Town Council	<a href="#">LPPO824</a>	Policy 6E	Support	<p>The Town Council is in agreement with the overall description of Bewdley as "an attractive historic market town and popular visitor destination" and happy with the town's place in the Settlement Hierarchy. It is felt that Bewdley's development needs can be met without adjusting the settlement boundary.</p> <p>Agree with Policy 6E and paragraphs following. Many of the draft policies in the Bewdley Neighbourhood Plan echo this policy. Conserving Bewdley's historic setting and landscape character is very important.</p> <p>Bewdley Town Council support the limited release of specific sites from the Green Belt. These sites are the Neighbourhood Plan's preferred development sites.</p>	Support and comments are noted.

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Barratt Homes West Midlands	<a href="#">LPPO771</a>	Policy 6E	Support	We support the recognition in Policy 6E that Stourport-on-Severn should make an “important” contribution to meet the District’s requirement for new homes. Stourport-on-Severn is the second largest settlement within the District. It accommodates approximately 20% of the District’s population. It should, therefore, be a focus for growth. We are, however, concerned that the emerging plan fails to make a sufficient number of allocations at the town to meet its growth requirements. Indeed, under Option A only 13.89% of the housing requirement will be delivered in Stourport. We comment on this matter further in our response to a Key Choice for Development Strategy and our response to Policy 32.	Support is noted. The Site Selection Paper provides detail on the decisions that have been made in terms of the development growth strategy for the District. This is also evidenced in the Sustainability Appraisal report.
Chaddesley Corbett Parish Council	<a href="#">LPPO1036</a>	Policy 6E	Comment	The acceptability of any green belt release should be determined against the criteria for rural exception sites.	Green Belt release has been informed by the Green Belt study. Policy 8C sets the criteria for rural exception sites.
Stourport on Severn Civic Society	<a href="#">LPPO1293</a>	Policy 6E	Comment	We question some of the assumptions behind this Review: <ul style="list-style-type: none"> <li>Local retail sector in Stourport does not just cater for local needs, as in Bewdley. We have three large supermarkets which cater for a district-wide market. The comment in 6E that “New retail development proposals should be appropriate to the town’s position in the District’s settlement hierarchy” reflects an</li> </ul>	Comments noted.

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				<p>inaccuracy about the town’s true position.</p> <ul style="list-style-type: none"> <li>Stourport has a significant, and growing, night-time economy including the Civic Hall, The Swan, The Wharf together with a number of eating places and live music. Why should night-life be centred on Kidderminster? This assumption does not accurately reflect the reality. Stourport has as much night-life as Kidderminster and is a safer environment.</li> </ul> <p>Stourport is developing a significant offering of night-time entertainment and food and this should be recognised and supported by appropriate facilities.</p>	
Stourport on Severn Civic Society	<a href="#">LPPO1294</a>	Policy 6E	Comment	<p>Frequent mention is made of promoting heritage tourism in Stourport but this requires adequate provision of public toilets in the town centre, sufficient parking and provision of “set down” points for coaches together with coach parking. We see no mention of the provision of such facilities in your Review.</p> <p>We welcome comments about maintaining the heritage environment of Stourport and developing heritage tourism. Part of the attraction of the town is the surrounding rural environment and care needs to be taken to maintain this.</p>	Comments noted.
Gladman Developments Limited	<a href="#">LPPO1345</a>	Policy 6E	Object	Gladman object to the intention to limit Bewdley’s contribution towards the District’s housing needs. This conflicts with the presumption in favour of sustainable	Objection is noted. The Site Selection Paper provides detail on the decisions that have been made in terms of the development growth

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				development. Bewdley has a good level of service provision and is well placed to benefit from Kidderminster's offer. The plan should not ignore Bewdley's housing needs.	strategy for the District. This is also evidenced in the Sustainability Appraisal report.
Persimmon Homes Limited	<a href="#">LPPO1586</a>	Policy 6E	Comment	<p>Not much potential development land within Bewdley, however this should not limit the ability of the town to grow and to allow continued support to its local services, facilities and residents. It will be necessary for focused Green Belt land releases to take place, on sites that do not significantly contribute to the purposes of the Green Belt.</p> <p>Enough land is needed for local needs for Affordable Housing. Further land will need to be released to allow for Affordable Housing which is needed within the area.</p> <p>The Council should consider the release of Green Belt land around the settlement in order to provide the necessary sites over the period of the plan.</p> <p><b>Development Strategy</b></p> <p>Concern with having Options A and B, also the way they have been presented and the lack of a preferred option.</p> <p>Table 6.0.3 sets out the availability data for the District</p>	Comments noted.

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				<p>in order to calculate the residual requirement for housing. RPS disagrees that lapsed planning permission should be included within this calculation and should not contribute towards the potential supply at the time of the calculation. As these have lapsed they no longer hold a valid planning permission and cannot be relied upon as part of the Council’s supply of housing. The Council has not distinguished between the existing and lapsed planning permissions and so it is not possible to calculate accurate availability data with the information provided. However, it is likely that this would result in a significant increase in the current shortfall in housing for the District.</p> <p><i>Options for Growth</i></p> <p>Do not consider that the Local Plan has looked fairly or reasonably at the options for growth as part of the development strategy for Wyre Forest District. The options presented are not balanced and do not allow for an honest discussion of the ways in which Wyre Forest can grow. As such the Council has merely presented its preferred option set against a less favourable strategy that is not a genuine alternative option.</p> <p>We do not consider that the options should be mutually exclusive and that a preferred option may be a mixture of the two stated options. If Option A or B</p>	

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				<p>were chosen it may not be the most suitable and acceptable way forward for a given settlement. Bewdley is considered for future development in option B where Catchem’s End is proposed. If Option A was chosen this would result in Bewdley only having marginal growth in housing which would be unacceptable and result in unsustainable growth.</p> <p>Bewdley accounts for 10% of the population within the District and requires a proportionate amount of housing. Option A for Bewdley would mean that the settlement would have a total of 175 dwellings allocated across the plan period, only 3.2% of total housing requirement. If Catchem’s End were to be included this would only rise to 4.6% of the housing requirement which is not commensurate to the size and capacity of the settlement.</p> <p>Realistic options for the future growth in Bewdley should be presented which can give an honest appraisal of sites and development locations in the town.</p> <p>Local Plan is inconsistent with the Bewdley Neighbourhood Plan. The emerging Neighbourhood Plan is indicating higher levels of housing growth for Bewdley, in keeping with the positive principles for growth in the NPPF. If Option A were to be chosen it would be inconsistent with the Neighbourhood Plan</p>	

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				<p>which has proposed Catchem’s End for a housing allocation. The Council should align with the emerging Neighbourhood Plan.</p> <p>No clear evidence why two Options were chosen. The two options appears to be engineered to produce Option A as the preferred option but doesn’t favour the Core Settlements of Kidderminster, Stourport and Bewdley. A fairly justified preferred option with each settlement having a direction of growth is required.</p> <p>Sites should be considered and proposed individually depending on the settlements need rather than as a whole district. Catchem’s End was included in the Sustainability Appraisal (May 2017) which identified no significant constraints. whilst also identifying a number of economic and social benefits by providing housing to support the growth in the local workforce and by providing a large area of public open space. The site is not mentioned in the settlement summary within the SA (part of appendix G.8) it performs strongly against other sites.</p> <p>There are a number of shortcomings with the current plan which need to be addressed not only in calculating the current supply and shortfall of housing within the District but also within the consideration of options for housing growth. Whilst no evidence based has been shown which shows how the Council have</p>	



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				derived the two options it is clear that they are not mutually exclusive and the presentation has been engineered from the offset. RPS considers that the process of choosing sites should be based on the individual settlements needs which does not seem to have occurred and should be revisited.	
Stourport High School	<a href="#">LPPO1175</a>	Policy 6E The Role of Stourport on Severn	Object	We support the recognition in Policy 6E that Stourport-on-Severn should make an “important” contribution to meet the District’s requirement for new homes. Stourport-on-Severn is the second largest settlement within the District. It accommodates approximately 20% of the District’s population. It should, therefore, be a focus for growth. We are, however, concerned that the emerging plan fails to make a sufficient number of allocations at the town to meet its growth requirements. Indeed, under Option A only 13.89% of the housing requirement will be delivered in Stourport. We comment on this matter further in our response to “Key Choice for Development Strategy” and our response to “Policy 32”.	Objection noted. The Site Selection Paper provides detail on the decisions that have been made in terms of the development growth strategy for the District. This is also evidenced in the Sustainability Appraisal report.
Bewdley Civic Society	<a href="#">LPPO821</a>	Policy 6E??	Comment	<p>The Bewdley Civic Society (BSC) supports the general statements and description in the Review of Bewdley's role as a Historic Market town and popular tourist destination, particularly in its drive and desire to...</p> <ul style="list-style-type: none"> <li>Continue the role of the Green Belt and other Landscape Protection Policies to protect the town's identity, historic setting and the</li> </ul>	Comments noted.

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				<p>attractiveness of the surrounding countryside.</p> <ul style="list-style-type: none"> <li>• Continue to preserve and enhance the Conservation Area and its Listed Buildings.</li> <li>• Provide new housing in accord with the Neighbourhood Plan's consultation results.</li> <li>• Protect the town from large scale retailing.</li> <li>• To enhance sustainable transport links between the various tourist attractions and the town.</li> </ul>	
	<a href="#">LPPO594</a>	6E	Support	Any development west of the River in Bewdley that would increase traffic in Welch Gate & thus further reduce the air quality should be prevented.	Support and comment noted.
Taylor Wimpey West Midlands	<a href="#">LPPO1476</a>	Policy 6E	Support	<p>Role of Stourport on Severn and Bewdley as part of the development strategy, recognising that Stourport-on-Severn has a more strategic role than Bewdley within the settlement hierarchy is supported.</p> <p>As a sustainable settlement, it is right that Stourport-on-Severn makes an important contribution to meeting the District's requirements for new homes within the Plan period.</p>	Support and comments are noted.
Historic England	<a href="#">LPPO1267</a>	Policy 6E	Comment	Policy 6E regarding market towns - could usefully include a clause relevant to the local historic environment. We support the reference to heritage	Support for Heritage Tourism within Policy 6E noted.

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				tourism in this policy.	<p>ACTION:</p> <p>Revise Policy 6E - Role of Stourport-on-Severn:</p> <p>Paragraph 1 to read:</p> <p>"Within the District's market towns of Stourport-on-Severn and Bewdley, both of which have Conservation Areas at their town centres,the following development proposals will be sought:"</p> <p>ACTION:</p> <p>Revise Policy 6E Stourport-on-Severn:</p> <p>Add bullet point:</p> <p>"Development within the three conservation areas should preserve or enhance those areas"</p> <p>ACTION:</p> <p>Revise Policy 6E Bewdley:</p> <p>Add bullet point:</p> <p>"Development within the Bewdley and Wribbenhall conservation areas should</p>

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					preserve or enhance those areas"
West Midland Safari Park	<a href="#">LPPO1326</a>	Policy 6E	Object	Policy 6E looks to enhance the role of Bewdley as a sustainable tourist destination through a particular focus on transport links to among other places, West Midland Safari Park. The policy could be used to justify requests to developers to make off-site provision or financial contributions. We object to this Policy as currently drafted. As with Policy 6C, this policy and/or the supporting text should be amended to more closely reflect paragraph 32 of the National Planning Policy Framework so that it is made clear that such provision or such contributions will only be sought where the residual cumulative impact of developments are severe, and where it is practical and viable so to do. The amendments should be as 6C.	Objection noted.
Wyre Forest Community Housing	<a href="#">LPPO1650</a>	Polkicy 6E	Support	We are in support of this policy and we particularly support small-scale Green Belt release and green field development.	Support is noted.
	<a href="#">LPPO3677</a>	Policy 6E	Object	6E - It appears you have changed the nature and characteristic/distinctiveness of Kidderminster as it is now not mentioned as a Market town, whilst Stourport and Bewdley maintain this title. When was this characteristic changed?	Objection is noted. Kidderminster was not identified as a 'market town' in the currently adopted Local Plan (see para 5.33 of adopted Core Strategy.) Both Stourport-on-Severn and Bewdley benefitted from their status as 'market towns' under the Advantage West Midland (AWM) Market Towns Initiative.
Wolverley & Cookley	<a href="#">LPPO1156</a>	Rural Develo	Comment	Wolverley and Cookley Parish Council are supportive of the need for housing development but want to ensure	Comments noted.

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Parish Council		pment		it happens in the right places and want to ensure that the identity and integrity of our individual villages is retained as this is vitally important to the local communities.	
Historic England	<a href="#">LPPO1268</a>	Policy 6F	Comment	Under Policy 6F for Villages and Rural Areas we would recommend including a clause on protecting historic farmsteads.	Comment on Policy 6F noted.  ACTION:  Policy 6F The Rural Economy to have the following clause added:  "Historic farmsteads will be protected from inappropriate development: for details refer to Policies 26 and 28A".
Taylor Wimpey West Midlands	<a href="#">LPPO1477</a>	Policy 6F	Support	Support Policy 6F to limit new residential development in the rural villages to meet local housing needs only. This is reflective of the settlement hierarchy where the most sustainable locations meet identified development needs.	Support noted.
	<a href="#">LPPO1591</a>	Policy 6F	Comment	The land designated WFR/CB/7 has over 7 ha of prime agricultural land. This is proposed as core employment use.	Comment noted.
Land Research & Planning Associates	<a href="#">LPPO550</a>	6F	Object	Policy that restricts provision of affordable homes as "exception sites" requires urgent modification. There is a 'District Wide' deficit and where a landowner is willing to provide land adjacent to or close by existing	Objection noted.

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Ltd				rural settlements and allow at least 50% affordable homes and /or Starter Homes, then this should be supported by the LPA to pave the way of reducing this serious deficit. The Policy should be modified to assist.	
Worcestershire County Council, Planning Economy & Performance	<a href="#">LPPO1134</a>	Policy 6F - Role of the villages and rural areas	Comment	<p>In practice, would the second bullet point under 'The Rural Economy' heading be too restrictive, given the amount of best and most versatile agricultural land in the district? 'Adverse impact' on best and most versatile could be argued for many different development proposals, and could be better expressed as direct and significant impact or a changing of the policy wording to reflect the need to look first to lower quality land wherever possible?</p> <p>Also under 'The Rural Economy', it is not clear what "small scale" means in part (i) of the third bullet point. In part (iii), we question the use of use wording that differs from that used in the NPPF, which does not mention "integrity as this may result in intended debates over the nature of the Green Belt and its function and appearance.</p>	Comments noted. These points raised will be considered in policy update.
Gladman Developments Limited	<a href="#">LPPO1346</a>	Policy 6F	Object	Although the 3 towns must play a key role in accommodating future development, this must not be at expense of ensuring needs of smaller settlements are met. Para 55 of NPPF seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. The development strategy	Objection noted.

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				must allow such settlements to thrive. The proposed approach in the emerging local plan risks smaller settlements being considered as unsustainable in principle. It contains no mechanism to allow them to improve their sustainability.	
Horton Estates Ltd	<a href="#">LPPO850</a>	Policy 6F	Comment	This draft policy fails to acknowledge draft Policy 34 which permits certain forms of development at PDL sites in the Green Belt and rural areas. It is requested that this policy be cross-referenced in the final sentence of draft Policy 6F (where there is currently a cross reference to Policy 35).	Comment noted. This suggestion will be considered in policy update.
	<a href="#">LPPO415</a>	Section 6	Object	<p>I wish to object to the development proposals particularly those relating to options A and B involving the extensive housing and industrial development to the east of Kidderminster. It would be a mistake to allow building in these areas for many reasons:</p> <ul style="list-style-type: none"> <li>• The proposed development would be too close to existing housing and merely enlarge the urban reach without any character.</li> <li>• The area is valuable as a green space which is used by existing residents/council tax payers who would be deprived of an amenity which contributes to a healthy life. The Council does has a responsibility to safeguard the quality of life and health of residents.</li> <li>• The area concerned is agricultural and wildlife habitats whose loss would impact on Hurcott</li> </ul>	Objection and comments noted. The Issues and Options consultation stage informed the growth options for the Preferred Options document.

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				<p>Wood. We cannot afford to lose farming especially if there is an increasing population.</p> <ul style="list-style-type: none"> <li>• An eastern bypass would be impossible if the area to the east of Kidderminster is already built on.</li> <li>• There would be too much strain on existing medical surgeries and it is unlikely that new practices would be set up.</li> </ul> <p>The plan envisages increasing the population of Kidderminster by 6000 houses, 10-20,000 people. There is little movement in, so really no need. Many will have to commute to Birmingham to work. The town will become a city and an urban satellite.</p> <p>If the expansion has to go ahead then I would support the proposal of OCAG-LP for a Lea Castle sustainable village to the north. This has many benefits as it could be self-sufficient and not deprive residents of important services and amenities. The grand plan does not evaluate various options for Kidderminster so it is not clear how the present plan was arrived at. If this was to be done (and published) then the relative advantages of a Lea Castle Village may be seen.</p>	
Wyre Forest Friends of the Earth	<a href="#">LPPO1311</a>	Paragraph 6.1	Comment	In the Summary of Issues and Options Response there is again concern about poor public transport along with traffic congestion. Implementing a modal shift away from car use needs to be planned and implemented	Comments noted. The emerging Local Plan has been informed by Transport modelling work. We also consult with the Highways Authority, Worcs County Council in terms of the highways



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				<p>during the plan period.</p> <p>For Bewdley, the summary states that new developments on brownfield sites in or adjacent to the town centre is limited by various factors including the Welch Gate air quality management area. This AQMA has been in place since 2003. Despite an action plan the only measure implemented has been a change in priority at the junction of Welch Gate with Dog Lane. The only effective action would be changing Welch Gate to a one way traffic flow or other traffic management measures in Bewdley town centre.</p>	<p>improvements required.</p>
	<p><a href="#">LPPO3934</a></p>	<p>6.1</p>	<p>Object</p>	<p>The Draft Local Plan excludes the areas of Blakedown, Churchill and Wolverley. Blakedown having the advantage of a railway station could provide ideal commuter opportunities to Birmingham and the West Midlands. However, given the objectives in the recently adopted Blakedown and Churchill Neighbourhood Plan, it would suggest that objectives within that Neighbourhood Plan, protecting tree scape, paths and green space, are not equally prioritised in other areas of the Wyre Forest District.</p> <p>Guidance on the Housing and Economic Development Needs Assessments, 2015 states 'Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios</p>	<p>Objection noted.</p> <p>The Bromsgrove District Local Plan is having to undertake an early Local Plan Review which includes a Green Belt Review to meet its housing shortfall.</p>

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				<p>that could be reasonably expected to occur’.</p> <p>This would suggest that objectively assessing housing need in the shorter term, as referenced in the Bromsgrove Local Plan, would alleviate the need for Green Belt land release.</p> <p>The absence of Blakedown and other areas within the Draft Local Plan, results in a plan that is neither in accordance with the guidelines for public consultation but also fails to meet requirements of both YouGov and Rural and Town Planning Institute best practice.</p>	
Wyre Forest Green Party	<a href="#">LPPO1410</a>	Para 6.1	Comment	In the Summary of Issues and Options Response there is again concern about poor public transport along with traffic congestion. Implementing a modal shift away from car use needs to be planned and implemented during the plan period.	Comments noted. The emerging Local Plan has been informed by Transport modelling work. We also consult with the Highways Authority, Worcs County Council in terms of the highways improvements required.
	<a href="#">LPPO358</a>	6.1	Comment	As a professional Biologist I can tell you that continued growth of the population (local and national) is not sustainable: politicians appear not to understand that population growth (note: I am not singling out migration or immigration, but 'population' as a whole) is not linear. Therefore, a pro-growth agenda for population is a terrible mistake.	Comments noted.
CORE11	<a href="#">LPPO200</a>	6-1	Support	Support for paragraph 6.1.	Support is noted.
	<a href="#">LPPO4482</a>	Summa	Comment	<i>“Local opposition from local residents (particularly the</i>	The source of the information in the ‘Summary

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		ry table - Issues and options		<i>Spennells Housing Estate) in respect of an Eastern Kidderminster extension (Option 3) although some support for this approach was expressed from other quarters-“ What support is this from and under what reason?</i>	Of Issues and Options Responses’ is from the Issues and Options consultation responses; a public consultation undertaken in 2015.
	<a href="#">LPPO3732</a>	Paragraph 6.1	Object	The summary is biased and selective and is not supported by evidence within the report. I objected to option 3 and live outside of the Spennells yet there is no mention that some residents outside of this area also rejected the eastern Kidderminster extension – the document is flawed.	Objection noted.
	<a href="#">LPPO3734</a>	Paragraph 6.3	Object	The amount of development that the Council says is required is completely fictitious and does not take into account the three independent analysis carried out by Oxford Economics, Cambridge Econometrics and Experian, which are dismissed by the OAHN report. Instead, the contracted Edge Analytics based upon a high unrealistic growth rate that is un-characteristic of Why Forest is taken forward. I object strongly to the methodology used, the bias that is systematically infused within the report and the conclusions reached. This is an attempt by the Council to grow the district un-naturally and completely alien to historic data without consideration to neighbouring competing areas nor what history has made obvious. The Council appears to remain oblivious to what people actually do	Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.

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				and remains tranced by an idealised model of the future based upon perfect scenarios that simply will not become reality. The Council has not learned lessons from more recent development at Easter Park where green belt was used to provide empty units that remain vacant since construction to the present date.	
	<a href="#">LPPO3678</a>	6.3	Object	6.3 There is not good transport links between Stourport and Bewdley as you state. The bus network is not sufficient and is not reliable. And there is no train network. Please advise your evidence.	Objection noted.
	<a href="#">LPPO3679</a>	6.4	Object	6.4 This contradicts your proposals as you will be destroying good agricultural land which the country needs more than ever as Brexit approaches. Has Brexit been factored into these proposals.	Objection noted.
	<a href="#">LPPO1949</a>	Para 6.4	Comment	<p>Shocked and disappointed re plans to build on green field and green belt sites on any proposal. Have noticed how many new builds in Wyre Forest area over recent years have been done on brown sites which is understandable -such as old factory sites -sugar beet/bottom of Clensmore/old garage sites / car parks etc. So am disappointed to see green sites now targeted.</p> <p>The area has had many new builds of late, e.g. Clensmore; Silver woods. Fail to see how eastern by pass would ease increase of projected traffic if plan A taken as traffic still to get around town which is already</p>	Comments noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.

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				<p>congested. Plan B will cause total gridlock on Stourbridge road, Broadwaters, Horsefair roads.</p> <p>Appreciate Lea Castle a brown site, but fail to see how our town can cope with traffic, pollution, lack of hospital. Can't see shops, new coffee bars and restaurants thriving as too much traffic to get there - not enough parking -not enough local employment to be able to afford.</p> <p>Building so near to Hurcott Woods is totally unacceptable re wildlife fauna and flora -and unfair on villagers. As is building back of Spennells is spoiling residents walking and well being. How does that serve to reduce obesity and encourage healthy lifestyle?</p> <p>Can't see the point of building more cafes; restaurants and cinema re Bromsgrove St area. Maybe new care homes better sited there.</p> <p>Please respect our wildlife and environment and give nature a chance. DO NOT SPOIL OUR GREEN FIELDS AND BELT.</p>	
	<a href="#">LPPO3935</a>	6.4	Object	<p>In 2012 the NPFF requires 'relevant planning authorities should take into account the economic and other benefits of the best and most versatile land' The fields bordering the Spennells estate are good quality grade 2 agricultural land, but there is no reference to</p>	Objection noted.

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				this grading in the Draft Local Plan. The single non specific reference is 6.40 'the quality of agricultural land is generally very high in the area, rising from the east and south east of Kidderminster to the district boundary'	
	<a href="#">LPPO4716</a>	6.4	Comment	<b>6.4</b> (page 25) The 'Key Diagram' mentioned in this paragraph says it supports the Development Strategy. It is indicted that it can be found on page 104 but that doesn't appear to be the case in this document. Is it somewhere else? Is it the diagram on page 108?	Comment noted. Agree - the Key Diagram is on page 108 in the Preferred Options document.
	<a href="#">LPPO505</a>	6.5	Object	House prices here are lower than in other parts of the West Midlands, a lot of houses for sale can take a while to sell. I cant see why we need so many new build houses in the next 17 years.? to take away the green belt which provides a sense of openness and space.	Objection noted. We have to plan for future population growth and the housing need for the District.
	<a href="#">LPPO469</a>	paragra ph 6.5	Object	In my opinion we do not need 300 new homes p.a.	Objection noted.
	<a href="#">LPPO280</a>	Housin g	Comment	The area needs extra housing, but it should be carefully planned. Some existing developments cram in too many properties EG the Bellway estate. No attention has been given to the adjacent canal - it has been ignored. Has any thought been given to converting Crown House to flats rather than demolition or leaving it empty?	Comments noted There are plans to demolish Crown House and regenerate that area of Kidderminster.
CORE11	<a href="#">LPPO201</a>	6-5	Comment	At 6-5 para d line 3 This line could be broadened to	Commented noted.

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				identify that" green infrastructure" is being recognised.	
	<a href="#">LPPO477</a>	paragra ph.6.5	Object	I do not believe that Wyre Forest District needs 300 more properties per annum. Also as there is a need for 540 elderly persons accommodation, I believe that a development like some of the developments in Birmingham which are more like village communities where there is a Doctors surgery on site would be more suitable on the Lea Castle Hospital site than 600 houses/flats.	Objection noted.
	<a href="#">LPPO3735</a>	Paragra ph 6.5	Object	For the reasons sighted in paragraph 6.3, the level of development is completely inappropriate for the district what is based upon flawed analysis. It is obvious that the Council is simply trying to justify Government investment to build its Eastern Bypass by belligerently building houses. A strategy from the past that simply will not deliver the benefits the Council thinks possible. The Council is trying to build virtually a new town on the outskirts of Kidderminster that will become a sole-less place of cheap housing boxes.	Objection and comments noted.  The housing requirement is based on the Objectively Assessed Housing Need (OAHN) study. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.
	<a href="#">LPPO4715</a>	6.5	Comment	I am concerned the figures given on the plan for the number of houses required each year to 2034 seems to be very high compared with the actual growth of Wyre Forest's population in recent years. I believe that we need more 1 and 2 bedroom properties locally in order that young people can get a foot on the property ladder or rental market and older people can downsize to free up family homes. The mention on the plan of	Comments noted. The housing requirement is based on the Objectively Assessed Housing Need (OAHN) study. The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.

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				510 care homes needed locally seems rather high and goes against current NHS guidance that people should remain and be cared for in their own homes.	
	<a href="#">LPPO4116</a>	6.5 general objection	Object	<p>As a preliminary matter, in spite of being significantly affected by the proposed core housing development, we have not been personally notified/served by either the council or others in respect of the proposed application(s).</p> <p>It is unclear what the impact of the apparent proposals of significantly increasing the amount of properties by over 6,000 will be; thus increasing the population by around 18,000. It is a known fact that we already have overburdened health &amp; social care services locally e.g. NHS (GP practices &amp; closure of A&amp;E at Kidderminster Hospital), Schools and Children's Services.</p> <p>What research/surveys have been undertaken in respect of the impact upon the environment of the construction of a relief road? Bromsgrove Road which at peak times is already busy.</p> <p>Similarly, what research has been undertaken in respect of the impact upon the environment of building so many homes on green belt land when there are large swathes of Kidderminster on brown field sites which have been allowed to become semi-derelict,</p>	The emerging Local Plan is supported by a number of evidence base studies which include ecological appraisals of sites, a Sustainability Appraisal and Transport modelling work. These evidence base studies have helped to inform the plan and the final site selection. The evidence base studies will be available to view on the Council's website throughout the consultation period.



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				<p>including the old post office.</p> <p>The town resembles a car boot sale with virtually all shops vacant and with no evidence of any attempt at regeneration. Furthermore, there is an apparent unexplored brown field site at Lea Castle and numerous other sites. Given this, and the areas of natural beauty (about which several others have addressed, including in pictorial format) we regard both proposals "A" and "B" to amount to wanton destruction.</p>	
	<a href="#">LPPO4119</a>	6.5 general comments	Comment	<p>Having referred to WCC population statistics for 2012 (the last available statistics), I note that around 22,000 of the population are aged over 65.</p> <p>Most facilities in Kidderminster are based in or near the town centre (supermarkets, shops, health centres).</p> <p>If homes more suited to the needs of the older population were to be provided near the town, this would:-</p>	Comments noted.

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				<p>free up family properties on the outskirts of the town, where schools are already available, reducing the need to build more housing in outlying areas.</p> <p>reduce social isolation.</p> <p>regenerate parts of the town centre, which is extremely depressed, especially now that the Central Business District has moved towards Weavers Wharf. There is little to attract anyone, local or visitor, to the town.</p> <p>Preserve green belt and productive agricultural land.</p>	
	<a href="#">LPPO4125</a>	6.5	Support	<p>Attracting new businesses is a massive undertaking, and faces enormous competition. There is no evidence that Wyre Forest has been successful at this in the past.</p> <p>Until there is a proven and successful plan to “grow” the local business base, the intention seems to be to</p>	Comments noted.

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				meet a need that simply doesn't exist.	
Wyre Forest Friends of the Earth	<a href="#">LPPO1312</a>	6.5 Housing Provision	Comment	Housing Provision. The population has been relatively static over the period 2001-2015 with a rise of 2.7%. The draft local plan assumes 300 dwellings are required p.a which would equate to an annual population growth of 7.7%. It is difficult to see how such a high growth rate is justified and it is likely that the actual growth rate is similar to the recent historical average. Consequently the total of new dwellings required is likely to be less than 3000 removing any need to build on the Green Belt.	The housing requirement is based on the Objectively Assessed Housing Needs (OAHN) study which uses population projections and household projection data published by the Office of National Statistics.
	<a href="#">LPPO172</a>	6.5, point d	Comment	Infrastructure: development to the West must take into account increased traffic flow to employment (motorway, railway, Worcester). Traffic from Bewdley either goes passed the Safari park/hospital/Sutton Park road, or Stourport (Gilgal/switch back/bridge. It makes more sense to develop to the East, with direct access to roads to Hagley & Worcester.	Comments noted.
Moor Park Trustees	<a href="#">LPPO1102</a>	6.6 Housing need	Comment	The draft policy appears to fail to deal with any issues of unmet housing need from the wider area and/or neighbouring authorities. There should be provision for adjustment of figures to allow the local Plan to effectively address any issues which arise and a commitment to meeting the specified housing requirements by the end of the plan. The local authority should treat housing requirements for the area as a minimum and commit to fulfilling the	Although Wyre Forest District is its own housing market area, WFDC continues to undertake Duty to Cooperate discussions with its neighbouring Local Authorities during the Local Plan Review process to ensure NPPF requirements are met.  Since the Preferred Options document was consulted on, the Government have published

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				requirements by 2034 to in order to boost housing supply as is a requirement within the NPPF. The plan should demonstrate that minimum targets should be met and exceeded during the plan period as well as continuing to keep an up to date five year housing land supply There should be a policy within the local Plan which sets out measures to ensure that the latter is sustained and not simply state that “sufficient” land will be provided to meet such needs.	their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	<a href="#">LPPO4055</a>	Paragraph 6.6	Object	One worrying thing we noted at the planning meeting was the planned Dwelling number for Wyre Forest was a set number but the figure for Care Facilities was Zero? Worrying when we have a growing population of elderly, they also need facilities not just the younger working population?	Objection noted. The Preferred Options document did include a requirement for C2 use (i.e. care homes / nursing homes for the elderly). This was set out in Policy 6A – Development Need for the district. The C2 requirement was 540 over the plan period.
	<a href="#">LPPO3824</a>	6.6 Housing Need	Comment	Proposes : <ul style="list-style-type: none"> <li>• That regular (every 5 or 10 years) assessments are carried out concerning the need for additional housing in the Kidderminster area as there has been little or no increase in the population of Kidderminster over the past twenty years.</li> <li>• Should the need for extra housing be significantly less than the estimated population growth then the valuable agricultural land earmarked for development should be optimised and continue to provide much</li> </ul>	Comments noted.

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				needed food produce and reduce the need to import food from elsewhere. As we all know once arable land is developed for housing there is no going back.	
	<a href="#">LPPO3956</a>	6.6 Housing Need	Comment	<p>We understand the need for further housing in Wyre Forest to facilitate affordable housing and social housing for local people. We do not agree that as much as a 12% growth in the number of households in Wyre Forest is required to accommodate migration to the area. If, as the plan suggests Wyre Forest has a 54% increase in the aging population (but you do not break it down to specific age groups ie, over 65yrs, over 75 yrs, over 85 yrs etc) leading up to 2034 and a reduction in younger population (due to low birth rate), requiring local housing, then isn't it feasible that there will be an excess of housing as current and future older residents die, with fewer younger generations requiring housing? Therefore I think that the estimated number of new houses needs to be reviewed to take this into account.</p> <p>The plan also mentions having more residential units, or care homes to accommodate the aging population. As Wyre Forest does not have any in-patient unit at Kemp Hospice maybe this would be an opportunity to consider having specialist palliative care beds within such institutions to accommodate individuals requiring</p>	Comments noted. The Objectively Assessed Housing Needs (OAHN) Study does consider the population of Wyre Forest District and the growing elderly population that we have in the District. This study provides the evidence base for our housing requirement and helps to shape the housing policies within the emerging Local Plan. The proposed site allocations also include allocations for C2 use (i.e. nursing homes / care homes).

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				specialist palliative care in the area. Even better, consider building a hospice on one of the brownfield sites such as Sladen or Sion Hill and then the existing Kemp Hospice (which was originally residential and not purpose built) could be converted into residential flats/apartments.	
	<a href="#">LPPO3965</a>	Paragraph 6.6	Object	<p>Quote from Government news:</p> <p><b>"Getting the right homes built in the right places</b></p> <p>Consulting on the principle of a new, standardised way of calculating housing demand to reflect current and future housing pressures. Every local area will need to produce a realistic plan and review it at least every 5 years.</p> <p>Currently 40% of local planning authorities do not have an up to date plan that meets the projected growth in households in their area. Fixing this will help make sure enough land is released for new homes to be built in the parts of the country where people want to live and work and ensure developments take heed of local people's wishes, while continuing with maximum protections for the green belt.</p> <p>Councils and developers will also be expected to use land more efficiently by avoiding building homes at low density and building higher where there is a shortage</p>	<p>Objection and comments noted.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>

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				<p>of land and in locations well served by public transport such as train stations."</p> <p>I do hope you will listen to all the information you receive during the consultation period, especially since your plan does not meet the government guidelines to protect greenbelt.</p>	
	<a href="#">LPPO2938</a>	6.6	Comment	I suggest that the numbers are reviewed and a number is put forward that more realistically represents the actual .	<p>Comments noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<a href="#">LPPO3387</a>	Option A	Object	<ul style="list-style-type: none"> <li>• The draft plan is driven by the landowners who responded to the appeal for land.</li> <li>• The population growth figures are not tenable - there is a proportion of residents aged 45-65 and 65+. This population do not produce many children.</li> <li>• There are enough brownfield sites to cater for</li> </ul>	Objection and comments noted.

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				<p>what is needed - these should be prioritised.</p> <ul style="list-style-type: none"> <li>Primary consideration should be given to revitalising Worcester Street and Bromsgrove Street with some planning for urban living.</li> </ul>	
	<a href="#">LPPO3830</a>	6.6 Housing Need	Comment	<p>I suggest that regular (every 5 or 10 years) assessments are carried out concerning the need for additional housing in the Kidderminster area as there has been little or no increase in the population of Kidderminster over the past twenty years. Why is this area suddenly required to provide housing for an additional estimated 6,000 homes which equates to around 20 to 30 thousand people?</p> <p>Should the need for extra housing be significantly less than the estimated population growth then the valuable agricultural land earmarked for development should be optimised and continue to provide much needed food produce and reduce the need to import food from elsewhere. As we all know once arable land is developed for housing there is no going back.</p>	<p>It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt, some of which is agricultural land.</p>
	<a href="#">LPPO4170</a>	6.6	Comment	<p>The Amion Report concludes that 5,400 new dwellings are required up to 2035. However this figure substantially overstates the demand.</p> <p>The SNPP 2014 shows a population increase of 4.7% and only a need for 199 dwellings per annum. PG – Short-Term shows a population increase of 5.8% and</p>	<p>Comments noted.</p> <p>The statistics used for the OAHN are statistics published by the Government from the Office of National Statistics.</p> <p>The OAHN follows the guidance for</p>



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				<p>only a need for 229 dwellings per annum. Our population has been virtually static since 1991. It has only grown 2.7% since 2001-2015 which would suggest both the above figures are on the high side.</p> <p>In the consultation document 300 dwellings is assumed but if we take PG-Short-Term data showing population increase 5.8% this is still more than double the rate of recent times and requires only 229 dwellings i.e. 1278 less and therefore no need to develop the Green Belt to the rear of Spennells.</p> <p>Even if we assume the population growth more than doubles when compared to 2001 to 2015 we do not need to develop the fields behind Spennells and additionally the report is over egging requirements by 878 dwellings once again evidencing no need to use Green Belt at the back of Spennells.</p> <p>The Amion Report confirms ongoing discussions with Greater Birmingham, presumably regarding overspill. Apparently, the Objective Assessment of Housing Need (OAHN) figure includes an unspecified number from Birmingham which should therefore be deducted from the total of 5,400.</p> <p>It is of interest to note that the Greater Birmingham &amp; Solihull Local Enterprise Partnership list on their website the names of Birmingham, Solihull and its</p>	<p>determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p> <p>The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements for the emerging Local Plan.</p>

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				<p>overspill satellite towns of Cannock Chase, Lichfield, Redditch, Tamworth and the one remaining area not at present a dormitory - Wyre Forest.</p> <p>WFDC have specified the number of houses they deem to be necessary. However, they have failed to put numbers to the resulting additional GPs, town centre parking places, etc. that will be required. (People will not be walking or cycling into town for their shopping.)</p> <p>Raises questions about implementing the Greater Birmingham &amp; Solihull LEPs Strategy and asks if it is WFDC's policy to take into account the demands from Greater Birmingham.</p>	
	<a href="#">LPPO4261</a>	6.6	Object	<p>The WFDC Assessment of Housing Needs identified that 291 dwellings would be needed per annum over the next 15 years. The available brownfield sites identified within the Wyre Forest would cater for 3,000 people. This figure is an understatement as WFDC have not taken into account property that is vacant but still being let by property owners, e.g. the vacant units long Coventry Street. We do not accept that these are unobtainable, since the CPO process can be used for the benefit of the community if the owners are unwilling to sell. Even taking into account this (arbitrary) rate of expansion, there would be no need to look at non-brownfield sites for 15 years at least.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>

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					Brownfield land has been considered as part of the Local Plan Review process. A Brownfield Land Register was published in December 2017 and has been used to inform the emerging Local Plan. This register is available on our website for public viewing. The HELAA document also includes an assessment of brownfield sites.
	<a href="#">LPPO3827</a>	6.6	Object	I believe the amount of housing that WFDC claims is needed (6,000 houses by 2034) is grossly inflated given the relatively static population growth in this area over the last fifteen years. The target number suggested does not take into account the local conditions regarding employment, low in migration rates and a realistic allowance for vacant properties. Recent research by the CPRE found that WFDC featured in the bottom 10 areas in the UK which have not reduced their allocated housing targets, despite having high proportions of protected countryside. WFDC was charged with accepting higher housing targets and the prospect of allowing developers to build upon environmentally valuable land. The Government's OAHN for Wyre Forest is 229 houses per year, yet this appears to have been inflated to 300 a year in the Draft Local Plan. Planning rules also state that this number should be reduced when facing the constraints.	Objection and comments noted.  Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO4026</a>	Paragraph 6.6	Object	One of the key issues mentioned was a need for housing to accommodate an increasing population.	Objection noted. The statistics used for the OAHN are statistics published by the

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				<p>Based on the OAHN report, it calculates that 199 houses per year for the next 18 are required. Furthermore, Wyre forest currently has a population of 99,503 and based on the OAHN report and has grown just 2.7% since 2001 and has maintained since 2011- significantly below the national average of 10.8%. In addition, since the decision to leave the EU, it is projected that population growth will decrease on the basis that we leave the single market and thus, end free movement and some EU migrants will return to home countries as a result.</p> <p>Furthermore, the statistics have been grossly exaggerated in your report. The plan states that 300 houses are required per annum which is based on a population growth of 8.2%- this would lead to an extra 1,818 homes that are not required. Also, according to the OAHN, there are 1216 vacant homes in the WFDC, it would make more sense so use these homes. Overall, extra housing to accommodate a growing population is not applicable to the Wyre Forest and therefore, is not justifiable to build on greenbelt land.</p>	<p>Government from the Office of National Statistics.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<a href="#">LPPO4440</a>	6.6 Housing Need	Object	<p>Analysis of Housing Requirements Projections</p> <ul style="list-style-type: none"> <li>HELLA Report I have added up the availability presented in the Hella report. This makes for very interesting reading.</li> </ul>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and</p>

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				<ul style="list-style-type: none"> <li>○ If the actual need were less than 3697, no Green Belt land would be required</li> <li>○ If the actual need were less than 4476, only brownfield Green Belt land would be required</li> </ul> <p>3. 8378 Green field Green Belt sites have been identified. This number obviously shows the absolute need to protect the Green Belt immediately and permanently.</p> <ul style="list-style-type: none"> <li>● Rounding – Justification?                      If the OAHN Report is accepted, then the requirement is calculated at 284 dwellings per year. The Report then rounds up this number to 300 dwellings per year. This simple unjustified action requires the building of 240 houses over the 15-year period                      In other words, a section of Green Belt land will be used for housing 240 houses purely because of a rounding up. Who does the rounding up benefit? My only conclusion is that it allows the developers to build more executive houses and therefore increase their profits. Why would Wyre Forest District Council take a decision which simply increases the profits of developers? Is the Council not here to serve the residents</li> <li>● Vacancy rate                      The OAHN Report says that the number of</li> </ul>	<p>PPG.                      Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>vacant properties in Wyre Forest is 3.2%                      It says that there are currently 44490 dwellings in Wyre Forest                      It then increases the allowance for vacant properties to 4.5 %. Whilst the 4.5% figure is taken from the 2011 census, Wyre Forest District Council is legally obliged to use the most up to date data available, i.e., the current Council Tax data. There is no logical reason to use the 4.5% figure instead of 3.2%                      The difference between 3.2% and 4.5% is 1.3%                      There are 44490 dwellings in Wyre Forest                      This means that an extra 44490 x 1.3% dwellings will be built or 578 dwellings (39 per year).                      In other words, because the OAHN consultants have chosen, without statistical justification, to increase the vacancy rate by 1.3%, 578 houses will be built on the Green Belt in order to allow for them to remain vacant.</p> <ul style="list-style-type: none"> <li>The main OAHN calculation of housing requirement.</li> </ul> <p>I believe that it is absolutely impossible for a mere mortal to analyse the OAHN Report and discover how the housing requirements were calculated. It is riddled with unexplained acronyms and utter gobbledeygook in a way that make it impossible to analyse and challenge.</p>	

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				<p>From my experience, I cannot tell whether this is a deliberate attempt to baffle residents of Wyre Forest or just because consultants are masters at making things as complicated as possible to justify their excessive charges. I have tried to replicate the calculations using data provided by the OAHN Report. I have looked at 2 population growth figures, 8.2 % which is a national average that obviously doesn't apply to Wyre Forest, and 2.1% which is the actual growth figure of population in Wyre Forest since 2001. Whilst I have used this figure it is my understanding that the population growth was all weighted to before 2011 and there has been nil growth since 2011. The figures also make no attempt to factor in potential population decline as the considerable number of European citizens in Wyre Forest falls post Brexit.</p> <p>I will try to explain my calculations as I do them:</p> <ul style="list-style-type: none"> <li>• Latest population figure for Wyre Forest: 98960</li> </ul> <p>Number of occupied dwellings: 43086 Average number of occupants per dwelling (98960/43086): 2.2968 (note: I have not made any attempt for allowing this average to decrease)</p>	

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				<p>Population Growth 2.1% Population growth 8.2%</p> <p>Population Growth from 98960 by 2078 or 8114</p> <p>Dwellings required (growth divided by 2.2968) 904 dwellings or 3533 dwellings</p> <p>Dwellings per year (over 15 yrs) 60 235</p> <ul style="list-style-type: none"> <li>• As a check as to whether my calculations work, if I add together the increased number of houses to be left vacant and the houses required for increased population at 8.2% it comes to <math>235 + 39 = 274</math> per year. This is so close to 284 that I feel that my simplistic calculation is somewhat less flawed than the number by which the consultants have rounded their calculation up.</li> <li>• Conclusion                      The figures used to calculate the housing requirement have been deliberately maximised to produce the highest possible number of houses required.                      There is absolutely no need to round the figures upwards.                      The use of 4.5% vacancy is out of date and should not have been used.                      The population growth figure taken by the OAHN has no basis in the reality of Wyre Forest. 2.1% is a far more realistic figure.                      This means that the housing requirement over</li> </ul>	



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				<p>the 15 year period of the local plan is far closer to 904 than 6000. The plan is totally flawed and must be totally withdrawn. There is absolutely no requirement to build on the Green Belt in Wyre Forest.</p>	
	<p><a href="#">LPPO4462</a></p>	<p>Housing Need</p>	<p>Comment</p>	<p>The Wyre Forest Assessment of Housing Need report is flawed and only just over 3000 dwellings are required which can mostly be met from Brown Field sites. The Local Plan should be reviewed.</p> <p>Wyre Forest Objective Assessment of Housing Need report</p> <ol style="list-style-type: none"> <li>1. I believe the Wyre Forest Objective Assessment of Housing Need report is flawed. Our population has been virtually static since 1991 (per Local Plan consultation section 2.2). It has only grown since 2001 to 2015 by 2.7% (compared to West Midlands 8.9%).</li> </ol> <p>1.1 The Office for National Statistics Sub National Population Projections (SNPP) 2014 evidences a growth in population for the outlook period of 4.7% and a requirement of 199 dwellings p.a. i.e. a reduction of 1818 dwellings over the 18 years bringing the total down from 5400 to 3582. Allowing for some flex and taking “PG-Short-Term” shows a population growth of</p>	<p>Comments noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>5.8% and only a need for 229 dwellings p.a. i.e. a reduction of 1278 dwellings over the outlook period.</p> <p>1.1.1 The plan figure of 300 dwellings p.a. appears to be based on a population growth rate of 7.7% which is a ludicrous 285% higher than the last 14 years which for the UK generally has been driven by immigration which will slow now we have voted for Brexit. One could argue the SNPP figures are too high.</p> <p>1.2 The vacant dwelling rate between 2005 and 2015 (per page 33) has been between 3.5% to 2.6%. The report assumes a vacant dwelling rate of 4.5%. As at 2015 it was 2.6% therefore the report is over egging the figures by 879 dwellings (46260 dwellings x 1.9% [1.9% being the difference between actual 2.6% and the reports assumed 4.5% which has never been reached in the last 10 years]).</p> <p>1.3 Combining 1.1 &amp; 1.2 gives a requirement of only 3243 dwellings over the outlook period and this is based on a growth in population running at 215% more than the current trend with predictions evidencing a slow down in immigration population growth since the vote for Brexit.</p> <p>1.4 Therefore, I recommend Option B is followed but Green Belt is only used after existing Brown Field sites</p>	

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				<p>have been developed.</p> <p>1.5 We were informed that the Council had Brown Field sites for 3000 dwellings so use of Green Belt should be a last resort.</p> <p>1.6 The planners have been misled by this independent report and a further review of Housing Need is required at a reduced level of need.</p> <p>1.7 Appendix A gives further clarification on Housing Needs.</p> <p>Appendix A</p> <p>Wyre Forest Objective Assessment of Housing Need final report April 2017</p> <p>The report suggests an annual dwelling requirement of between 199 and 291 per Table 3.2 with further flexing assuming there is a partial return to 2008 Headship rates giving 239-332 – Table 3.4</p> <p>199 is derived from the Office for National Statistics Sub National Populations Projections (SNPP) 2014 report and the 332 figure from the HH-14 report which is based on partial return to the 2008 headship rates reflective of the different market conditions during the period from which the model was calibrated</p>	

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				<p>i.e. we were in a boom era.</p> <p>Further flex has been given to the model via:</p> <ul style="list-style-type: none"> <li>. PG-Short-Term: with internal and international migration assumptions based on a 6- year (Short-Term) Migration Trend (2009/10–2014/15). The UPC component is included within the historical international migration estimates up to 2011.</li> <li>• PG-Short-Term-X: with internal and international migration assumptions based on a 6- year (ShortTerm) Migration Trend (2009/10–2014/15). The UPC component is excluded from the historical time series of MYE data.</li> <li>• PG-Long-Term: with internal and international migration assumptions based on a 14- year Migration Trend (2001/02–2014/15). The UPC component is included within the historical international migration estimates up to 2011.</li> <li>• PG-Long-Term-X: with internal and international migration assumptions based on a 6- year (ShortTerm) Migration Trend (2001/02–2014/15). The UPC component is excluded from the historical time series of MYE data.</li> </ul> <p>I would argue PG-Short-Term data is more</p>	

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				<p>representative of the future as PG –Long-Term data includes the boom of 2001/2 to 2007/8</p> <p>The SNPP 2014 shows a population increase of 4.7% and only a need for 199 dwellings per annum.</p> <p>PG – Short-Term shows a population increase of 5.8% and only a need for 229 dwellings per annum</p> <p>Our population has been virtually static since 1991 (per consultation section 2.2). It has only grown 2.7% since 2001-2015 (compared to the West Midlands of 8.9%) which would suggest both the above figures are on the high side.</p> <p>In the Consultation document Section 6.A 300 dwellings is assumed but if we take PG-Short-Term data showing population increase 5.8% this is still more than double the rate of recent times and requires only 229 dwellings i.e. 1278 less and therefore no need to develop the green belt to the rear of Spennells.</p> <p>The plan figure of 300 dwellings p.a. appears to be based on a population growth rate of 7.7% which is a ludicrous 285% higher than the last 10 years which for the UK generally has been driven by immigration which will slow now we have voted for Brexit. One could argue the SNPP figures are too high.</p>	

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				<p>In The Labour Force and Employment Implications section the unemployment rate is assessed to be fixed between 2020-2034 which is unrealistic as we have always been a boom and bust economy. Therefore the modelling is optimistic (section4.10).</p> <p>Section 4.16 indicates due to ageing population economic activity and employment are projected to decline.</p> <p>Cambridge Econometrics suggest an increase in jobs of 76p.a., Oxford Economics suggest 2p.a. and Experian suggest -61p.a.</p> <p>I think the above results show they can be ignored as they do nothing to inform the process.</p> <p>Section 5 simply recommends 300 dwellings p.a.</p> <p>The vacant dwelling rate between 2005 and 2015 has been 3.5% to 2.6%. The report assumes a vacant dwelling rate of 4.5%. As at 2015 it is 2.6% (page 33) therefore the report is over egging the figures by 879 dwellings (46260 x1.9%).</p> <p>My conclusion is even if we assume the population growth more than doubles when compared to 2001 to 2015 we do not need to develop the fields behind Spennells and additionally the report is over egging</p>	

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				requirements by 879 dwellings once again evidencing no need to use Green Belt at the back of Spennells or in many other locations. Assuming the population growth more than doubles and reducing the vacant dwelling % to current levels indicates a requirement of 3243 dwellings over the outlook period i.e. 180 p.a.	
	<a href="#">LPPO1978</a>	Housing need	Comment	It appears the growth has been over estimated to justify the amount of housing needs over the next few years and into the future.	Comments noted.
	<a href="#">LPPO2105</a>	Housing Need	Object	<p>I am not convinced the amount of homes we need for the Wyre Forest is 6,000. It states in the plan that we have had a static population with quite a large proportion of elderly people. So with this in mind I believe we should only be building what we will need for the next 5 years which is drastically less than 6000.</p> <p>If the plan includes attracting people to move to the area and increase revenue I feel by encouraging businesses, road infrastructure, investment in a fully operational hospital including A&amp;E, two extra Doctor practices, extra schools from primary to secondary, new fire station, an extra 30 police to the area first and then perhaps some of our unemployed in the area will get jobs and be able to afford the houses you are planning to build.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p> <p>The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements for the emerging Local Plan.</p>

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 6: A SUSTAINABLE FUTURE –  
DEVELOPMENT STRATEGY (excluding paragraphs 6.54-6.57)**

Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
	<a href="#">LPPO2733</a>	6.6 OAHN	Comment	<p>I object to all proposals set out in the Local Plan as I do not consider the assessment of need and calculations contained within the Local Plan to be robust. I appreciate that Local Authorities are finding themselves under increasing pressure, particularly in relation to people resources, however the Local Plan should be of upmost priority and the production a sub-standard and ill-informed statutory document is unacceptable.</p> <p><b>Purpose of the OAHN document</b></p> <p>With respect to the first point, the OAHN document has not been produced with the intention of becoming a public facing document. The document produced by Amion Consulting is a classic example of a private consultancy’s technical output to a client (in this case WFDC). I suspect that WFDC have not completed a comprehensive technical review of the document and as such the contents of the document are not fully understood. At the very least, if the OAHN document was intended to become a public facing document then WFDC should have included this in their brief to Amion Consulting. In addition to this, WFDC have also uploaded a substantial amount of supporting “evidence” to their website which is purposely counter- productive because it overwhelms the public with information, rather than providing succinct, well-informed and readable information to inform their</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>



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				<p>response to the Local Plan.</p> <p><b>Lack of transparency about assumptions</b></p> <p>The OAHN is not clear about the assumptions that have been applied to conclude with 5,400 houses (300 per annum) needed over the Plan period. In an attempt to better understand the origin of the 5,400 houses, I have completed a review of existing population and housing numbers available from data.gov.uk.</p> <p>Data available from the Office for National Statistics demonstrates that between 1981 and 2015, population growth has at the most experienced a growth rate of 0.6% year on year (see Table 1), but on average the growth rate has been 0.24%. If this average growth is applied to future years, the total population in 2034 is 104,500. This equates to a population increase of 4,600, which is in line with the population projections made in Table 2 and therefore appears to be a sensible assumption. There is also data available on the projected number of households up to the 2034. The household projections demonstrate that between 2016 and 2034, the Local Plan Period, 3,420 additional houses are required, equating to 190 new households per annum.</p> <p>A series of tables with data have been supplied to back</p>	

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				up the statements.	
	<a href="#">LPPO2131</a>	Housing Need	Comment	Is Wyre Forest DC really certain that the need for housing in this area is so great? Or would we be building to encourage people from other areas to move here? That would be good if the areas of Kidderminster and Stourport could sustain so much development, which I do not believe they can.	<p>Comments noted. The proposed development requirement is based on the housing need for the District. This housing need was evidenced in the OAHN study published in April 2017.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>
	<a href="#">LPPO2537</a>	6.6 Housing Need	Object	Both options assume more homes are needed than are I believe are justified. Table 6.0.1 Page 25 says 300 pa. but the Amion report suggests 254 p.a. Also, the Guidance Housing and Economic Development Needs, 2015, states that local councils need only base their assessment on "future scenarios that could reasonably be expected to occur", not hypothetical future scenarios. The OAHN Report states that the census has measured growth within the Wyre Forest over the past 15 years that may provide a more realistic future scenario.	<p>Objection noted. The OAHN study published in April 2017 stated that 300pda was required over the plan period.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore</p>

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					undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	<a href="#">LPPO2092</a>	Housing Need	Object	<p>The proposal to build up to 6000 dwellings on Green Belt land is unjustifiable when there has been scant growth to Kidderminster’s population. Over the last fifteen years or so, a number of the town’s industries and businesses have closed causing many job losses. This has reduced Kidderminster to a low economy area with many medium to large retail outlets replacing lost businesses. The current economy of the town cannot justify building new homes that will be unaffordable for those who are on low incomes and on the current housing list. Where are the jobs/growth of jobs within Kidderminster to justify the amount of homes proposed?</p> <p>Is this a plan to increase extra funds through the council tax by having an excessive amount of new homes built for the long term? You must take into account the local residents concerns to these unrealistic plans and reconsider prioritising to redevelop the town centre which is long overdue.</p>	The Local Plan Review process doesn’t just allocate sites for housing, it also allocates potential sites for employment to meet its employment land requirement. The Employment Land Review evidence base study sets out what the employment requirement is for the district during the plan period. This evidence base study is used to inform the site allocations in the emerging Local Plan for employment use.
	<a href="#">LPPO3392</a>	Housing need	Comment	I cannot understand why WFDC have opted to propose to build more houses than the Government requires. It is only one of two District Councils in the West	<p>Comments noted.</p> <p>The OAHN follows the guidance for</p>

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				Midlands to have done so. The number of houses being planned is far in excess of even the most optimistic forecasts of future housing needs.	determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO3265</a>	Housing Need	Object	I imagine that I echo other respondents in urging that brownfield sites be developed before green belt, that the possibility of residential development in the town centre is fully explored, that affordable and social housing which meets the needs of Wyre Forest residents is prioritised, and that due weight is given to potential environmental damage, lack of adequate road capacity, infrastructure and public transport, and the need for adequate provision of community facilities.	Objection noted.  The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO4693</a>	6.6 Housing Need	Comment	This plan says more households are needed well above the population increase. This reflects the lack of social cohesion within local families or the justification to	Comment noted.  The OAHN follows the guidance for

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				plan for more development than will be needed for local people, and therefore encourage inward migration. If the latter, what is the evidence to support it will be needed.	determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO4644</a>	6.6 Housing Need	Object	Disagree with projection of number of properties required. Suggest revise number based on experience in Wyre Forest rather than the whole West Midlands with a possible 5 year review to take account of any changes arising due to the economic cycle or Brexit developments.	Objection noted.  The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO4639</a>	6.6 Housing Need	Object	Object. Review Local Plan; the Wyre Forest Assessment of Housing Need report is flawed and required 3000 dwellings are can be met from Brown	Objection noted.  The OAHN follows the guidance for

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				Field sites.	determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO4660</a>	6.6 Housing Need	Object	I notice from the 'Key Issues' that the population since 1991 had remained static with only an aggregate increase of 2.2.% in the last 24 years. These figures only go up to 2015, has there since been a census for 2015-2017 to see whether the population is in fact increasing at the same rate as the 2 years from 2013-2015? If there is no evidence of such an increase then would the 5,400 not be a little overkill? If between now and 2034 the population increased by 1.1% every 2/3 years, would this not only mean a growth of c6.6%, being 6,567 people and with a national household average of 4, this would only assume c1700-2000 dwellings were required? What is the logic behind the strategy of such a large number of dwellings being required? Similarly, if the population is ageing, should the plans not incorporate the need of this ageing population i.e. ensure low-level housing/ bungalows	The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036. There will be a marked increase in the number and proportion of older residents. The population aged 65+years is expected to increase by 28.1% from 24,200 in 2016 to 31,800 in 2036. (Data based on ONS 2016-based Subnational Population Projections).  This suggests that the population is not 'static'. For further information please see the updated OAHN Study which will be published on the Council's website during the Pre-Submission consultation.

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				are developed to suit the needs of the elderly (who can live independently in their own homes) and to effectively 'free-up' family homes within already developed areas in order to avoid development for developments sake?	
	<a href="#">LPPO4386</a>	Housing Need Figures	Comment	The housing need figures are questionable and do not necessitate the choice between Option A or B as the additional land take is not required yet.	Comment noted.
	<a href="#">LPPO4446</a>	6.6 Housing Need	Object	<p>Disagree with your calculations that 5000+ houses are needed. Where are all these people coming from? I believe these figures have been grossly inflated, and rounded up time after time, rendering them totally inaccurate. Please see below:</p> <p><b>HELLA report</b> I have added up the availability presented in the Hella report. This makes for very interesting reading. There are several interesting things about this table:</p> <ol style="list-style-type: none"> <li>1. If the actual need were less than 3697, no Green Belt land would be required</li> <li>2. If the actual need were less than 4476, only brownfield Green Belt land would be required</li> <li>3. 8378 Greenfield Green Belt sites have been identified. This number obviously shows the absolute need to protect the Green Belt immediately and permanently.</li> </ol> <p><b>Rounding – Justification?</b></p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>If the OAHN Report is accepted, then the requirement is calculated at 284 dwellings per year. The Report then rounds up this number to 300 dwellings per year. This simple unjustified action requires the building of 240 houses over the 15-year period                      In other words, a section of Green Belt land will be used for housing 240 houses purely because of a rounding up. Who does the rounding up benefit? My only conclusion is that it allows the developers to build more executive houses and therefore increase their profits. Why would Wyre Forest District Council take a decision which simply increases the profits of developers? Is the Council not here to serve the residents?</p> <p><b>Vacancy rate</b>                      The OAHN Report says that the number of vacant properties in Wyre Forest is 3.2%                      It says that there are currently 44490 dwellings in Wyre Forest                      It then increases the allowance for vacant properties to 4.5 %. Whilst the 4.5% figure is taken from the 2011 census, Wyre Forest District Council is legally obliged to use the most up to date data available, i.e., the current Council Tax data. There is no logical reason to use the 4.5% figure instead of 3.2%                      The difference between 3.2% and 4.5% is 1.3%                      There are 44490 dwellings in Wyre Forest                      This means that an extra 44490 x 1.3% dwellings will</p>	



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				<p>be built or 578 dwellings (39 per year).                      In other words, because the OAHN consultants have chosen, without statistical justification, to increase the vacancy rate by 1.3%, 578 houses will be built on the Green Belt in order to allow for them to remain vacant.</p> <p>The main OAHN calculation of housing requirement. I believe that it is absolutely impossible for a mere mortal to analyse the OAHN Report and discover how the housing requirements were calculated. It is riddled with unexplained acronyms and utter gobbledygook in a way that make it impossible to analyse and challenge.</p> <p>From my experience, I cannot tell whether this is a deliberate attempt to baffle residents of Wyre Forest or just because consultants are masters at making things as complicated as possible to justify their excessive charges.</p> <p>To bring a level of sanity to the calculations I have tried to replicate the calculations using data provided by the OAHN report.</p> <p>I have looked at 2 population growth figures, 8.2 % which is a national average that obviously doesn't apply to Wyre Forest, and 2.1% which is the actual growth figure of population in Wyre Forest since 2001. Whilst I have used this figure it is my understanding that the population growth was all weighted to before 2011 and there has been nil growth since 2011. The figures also make no attempt to factor in potential</p>	

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				<p>population decline as the considerable number of European citizens in Wyre Forest falls post Brexit. I will try to explain my calculations as I do them:</p> <p>Latest population figure for Wyre Forest: 98960                      Number of occupied dwellings: 43086                      Average number of occupants per dwelling (98960/43086): 2.2968                      (note: I have not made any attempt for allowing this average to decrease)                      Population Growth 2.1% Population growth 8.2%                      Population Growth from 98960 to 2078 or 8114                      Dwellings required (growth divided by 2.2968) 904 or 3533                      Dwellings per year (over 15 yrs) 60 or 235</p> <p>As a check as to whether my calculations work, if I add together the increased number of houses to be left vacant and the houses required for increased population at 8.2% it comes to 235 + 39 = 274 per year. This is so close to 284 that I feel that my simplistic calculation is somewhat less flawed than the number by which the consultants have rounded their calculation up.</p> <p><b>Conclusion</b>                      The figures used to calculate the housing requirement have been deliberately maximised to produce the highest possible number of houses required.</p>	

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				<p>There is absolutely no need to round the figures upwards.</p> <p>The use of 4.5% vacancy is out of date and should not have been used.</p> <p>The population growth figure taken by the OAHN has no basis in the reality of Wyre Forest. 2.1% is a far more realistic figure.</p> <p>This means that the housing requirement over the 15 year period of the local plan is far closer to 904 than 6000. The plan is totally flawed and must be totally withdrawn. There is absolutely no requirement to build on the Green Belt in Wyre Forest.</p>	
	<a href="#">LPPO4488</a>	Housing Need	Object	<ul style="list-style-type: none"> <li>Plans are overstating the need for new housing.</li> <li>The housing needs report states that the reason for so much housing is to attract overspill from surrounding areas to solve the issues there - not really 'local'.</li> </ul>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>
	<a href="#">LPPO4914</a>	6.6	Object	The Wyre Forest Assessment of Housing Need report is flawed and only just over 3000 dwellings are required	Objection noted.

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				<p>which can mostly be met from Brown Field sites. The Local Plan should be reviewed.</p> <p>Wyre Forest Objective Assessment of Housing Need report</p> <ul style="list-style-type: none"> <li>• I believe the Wyre Forest Objective Assessment of Housing Need report is flawed. Our population has been virtually static since 1991 (per Local Plan consultation section 2.2). It has only grown since 2001 to 2015 by 2.7% (compared to West Midlands 8.9%).</li> <li>• The Office for National Statistics Sub National Population Projections (SNPP) 2014 evidences a growth in population for the outlook period of 4.7% and a requirement of 199 dwellings p.a. i.e. a reduction of 1818 dwellings over the 18 years bringing the total down from 5400 to 3582. Allowing for some flex and taking “PG-Short-Term” shows a population growth of 5.8% and only a need for 229 dwellings p.a. i.e. a reduction of 1278 dwellings over the outlook period.</li> <li>• The plan figure of 300 dwellings p.a. appears to be based on a population growth rate of 7.7% which is a ludicrous 285% higher than the last 14 years which for the UK generally has been driven by immigration which will slow now we have voted for Brexit. One could argue the</li> </ul>	<p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				<p>SNPP figures are too high.</p> <ul style="list-style-type: none"> <li>• The vacant dwelling rate between 2005 and 2015 (per page 33) has been between 3.5% to 2.6%. The report assumes a vacant dwelling rate of 4.5%. As at 2015 it was 2.6% therefore the report is over egging the figures by 879 dwellings (46260 dwellings x 1.9% [1.9% being the difference between actual 2.6% and the reports assumed 4.5% which has never been reached in the last 10 years]).</li> <li>• Combining 1.1 &amp; 1.2 gives a requirement of only 3243 dwellings over the outlook period and this is based on a growth in population running at 215% more than the current trend with predictions evidencing a slow down in immigration population growth since the vote for Brexit.</li> <li>• It was confirmed that the Council had Brown Field sites for 3000 dwellings so use of Green Belt should be a last resort.</li> <li>• The planners have been misled by this independent report and a further review of Housing Need is required at a reduced level of need.</li> </ul> <p>Appendix A gives further clarification on Housing Needs.</p>	

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				<p>Appendix A</p> <p>Wyre Forest Objective Assessment of Housing Need final report April 2017</p> <p>The report suggests an annual dwelling requirement of between 199 and 291 per Table 3.2 with further flexing assuming there is a partial return to 2008 Headship rates giving 239-332 – Table 3.4</p> <p>199 is derived from the Office for National Statistics Sub National Populations Projections (SNPP) 2014 report and the 332 figure from the HH-14 report which is based on partial return to the 2008 headship rates reflective of the different market conditions during the period from which the model was calibrated i.e. we were in a boom era.</p> <p>Further flex has been given to the model via:</p> <ul style="list-style-type: none"> <li>. PG-Short-Term: with internal and international migration assumptions based on a 6- year (Short-Term) Migration Trend (2009/10–2014/15). The UPC component is included within the historical international migration estimates up to 2011.</li> <li>• PG-Short-Term-X: with internal and international migration assumptions based on a 6- year (ShortTerm) Migration Trend</li> </ul>	

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				<p>(2009/10–2014/15). The UPC component is excluded from the historical time series of MYE data.</p> <ul style="list-style-type: none"> <li>• PG-Long-Term: with internal and international migration assumptions based on a 14- year Migration Trend (2001/02–2014/15). The UPC component is included within the historical international migration estimates up to 2011.</li> <li>• PG-Long-Term-X: with internal and international migration assumptions based on a 6- year (ShortTerm) Migration Trend (2001/02–2014/15). The UPC component is excluded from the historical time series of MYE data.</li> </ul> <p>I would argue PG-Short-Term data is more representative of the future as PG –Long-Term data includes the boom of 2001/2 to 2007/8</p> <p>The SNPP 2014 shows a population increase of 4.7% and only a need for 199 dwellings per annum.</p> <p>PG – Short-Term shows a population increase of 5.8% and only a need for 229 dwellings per annum</p> <p>Our population has been virtually static since 1991 (per consultation section 2.2). It has only grown 2.7% since 2001-2015 (compared to the West Midlands of 8.9%) which would suggest both the above figures are on the</p>	

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				<p>high side.</p> <p>In the Consultation document Section 6.A 300 dwellings is assumed but if we take PG-Short-Term data showing population increase 5.8% this is still more than double the rate of recent times and requires only 229 dwellings i.e. 1278 less and therefore no need to develop the green belt to the rear of Spennells.</p> <p>The plan figure of 300 dwellings p.a. appears to be based on a population growth rate of 7.7% which is a ludicrous 285% higher than the last 10 years which for the UK generally has been driven by immigration which will slow now we have voted for Brexit. One could argue the SNPP figures are too high.</p> <p>In The Labour Force and Employment Implications section the unemployment rate is assessed to be fixed between 2020-2034 which is unrealistic as we have always been a boom and bust economy. Therefore the modeling is optimistic (section4.10)</p> <p>Section 4.16 indicates due to ageing population economic activity and employment are projected to decline.</p> <p>Cambridge Econometrics suggest an increase in jobs of 76p.a., Oxford Economics suggest 2p.a. and Experian</p>	



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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				<p>suggest -61p.a.</p> <p>I think the above results show they can be ignored as they do nothing to inform the process.</p> <p>Section 5 simply recommends 300 dwellings p.a.</p> <p>The vacant dwelling rate between 2005 and 2015 has been 3.5% to 2.6%. The report assumes a vacant dwelling rate of 4.5%. As at 2015 it is 2.6% (page 33) therefore the report is over egging the figures by 879 dwellings (46260 x1.9%).</p> <p>My conclusion is even if we assume the population growth more than doubles when compared to 2001 to 2015 we do not need to develop the fields behind Spennells and additionally the report is over egging requirements by 879 dwellings once again evidencing no need to use Green Belt at the back of Spennells or in many other locations. Assuming the population growth more than doubles and reducing the vacant dwelling % to current levels indicates a requirement of 3243 dwellings over the outlook period i.e. 180 p.a.</p>	
	<a href="#">LPPO4823</a>	6.6 - Housing Need	Object	The OAHN report which was used by the council to arrive at the number of houses needed states that the census is a relevant source, which would be the most accurate measurement of growth within the Wyre Forest over the past 15 years. It then ignores it and	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be</p>

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				<p>instead uses arbitrary national and regional figures to arrive at the final growth rate. The plan figure of 300 houses per year would equate to a population growth of 7.7%, where the actual rate for this area is 2.7% (2001-2015). Wyre Forest has a population growth below the national average and within the guidance on the Housing and Economic Development Needs Assessments 2015, it states that ‘assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur’. This is not therefore a requirement to build more houses than actually needed. The Council’s own document at 6.1 is seeking a ‘...pro-growth agenda’ and if that pro-growth element is also taken out of the council’s figures together with a reduction for lower immigration following Brexit, we would be looking at a substantially reduced figure of possibly 3500 houses. Catering for population growth over and above that which is actually required is wrong, especially when it involves using Green Belt or potentially affects SSSIs.</p>	<p>updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<a href="#">LPPO4827</a>	6.6 Housing Need	Object	<p>Questions the OAHN which assumes a need for 5400 new homes in the period up to 2034. The report is based on population growth of 5.8%, twice the growth of 2.7% experienced over the period 2001-15. It also assumes a void dwelling rate of 4.7% whereas the actual in the District in 2015 was 2.6%. If the actual</p>	<p>Objection noted.  The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and</p>

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				<p>void rate was adopted this would reduce the requirement by nearly 900 dwellings.</p> <p>Due to the aging population of Wyre Forest the workforce over the period is likely to fall. The proportion of the population of Wyre Forest aged over 65 is 23.4% (national average 17.6%). The aging population is also likely to free up a large amount of the existing housing stock. Has this factor been taken into consideration?</p> <p>Section 6.8 refers for the need of the Plan to be prepared in consultation with neighbouring Housing Market Areas. There is concern that as the WFDC is a member of Greater Birmingham and Solihull Partnership and getting funding from the LEP. The LEP will in return ask Wyre Forest to provide housing to alleviate the severe housing pressures in the Birmingham HMA. The Greater Birmingham and Solihull Local Enterprise Partnership is already substantially funding the improvement to Kidderminster station.</p> <p>We need clarity on what specific agreements exist between Wyre Forest DC and Greater Birmingham and Solihull Local Enterprise Partnership to contribute housing supply to meeting that areas housing shortfall.</p> <p>Greater outward commuting to Birmingham and the</p>	<p>PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>Black Country is only likely to lead to increased congestion without substantially improved road links. In addition there would be further strain on the health and education infrastructure of the Wyre Forest.</p> <p>The assumptions of Housing Need should be scrutinised as there appears to be flaws in the document particularly as to projected population growth rates in the light of past trends and also assumptions as to housing void levels. A clear statement of overspill provision and policy in regard to the Greater Birmingham and Solihull LEP Housing needs to be set out.</p>	
	<a href="#">LPPO4826</a>	6.6 - Housing Need	Object	<p>The recent march to the Kidderminster Town Hall made by Wyre Forest residents on 4<sup>th</sup> August demonstrates the strong feeling there is against many aspects of the Local Plan. The OAHN report which was used by the council to arrive at the number of houses needed states that the census is a relevant source, which would be the most accurate measurement of growth within the Wyre Forest over the past 15 years. It then ignores it and instead uses arbitrary national and regional figures to arrive at the final growth rate. The plan figure of 300 houses per year would equate to a population growth of 7.7%, where the actual rate for this area is 2.7% (2001-2015). Wyre Forest has a population growth BELOW the national average and within the guidance on the Housing and Economic</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>

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				<p>Development Needs Assessments 2015, it states that ‘assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur’. This is not therefore a requirement to build more houses that actually needed. The council’s own document at 6.1 is seeking a ‘...pro-growth agenda’ and is that pro-growth element is also taken out of the council’s figures together with a reduction for lower immigration flowing brexit, we would be looking at a substantially reduced figure of possibly 3500 houses.</p> <p>We and many other feel that catering for population growth over and above that which I actually required is wrong, especially when it involved using greenbelt for it and such developments could potentially affect some sites of special scientific interest (development around Hurcott, for example)</p>					
	<a href="#">LPPO4752</a>	6.6 Housing Need	Object	<p><b><u>Objective: To determine how many housing units are required.</u></b></p> <p>Figures provided by the Council allege that 6,000 additional units are required during the period of the Plan. These have been allocated as follows:</p> <table data-bbox="792 1244 1473 1382"> <tr> <td>Brownfield sites</td> <td>2950</td> </tr> <tr> <td>Greenfield sites (excluding the Green Belt)</td> <td>350</td> </tr> </table>	Brownfield sites	2950	Greenfield sites (excluding the Green Belt)	350	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published</p>
Brownfield sites	2950								
Greenfield sites (excluding the Green Belt)	350								

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				<p>Greenfield sites in the Green Belt (Core Site) 1900</p> <p>Other (Option A - entirely Green Belt or Option B – Green Belt Outside the Green Belt) 1100 750 550</p> <p>Totals 1300 6300 / 6500</p> <p>N.B. These figures do not make sense and the conclusion is therefore illogical. Option A produces a total of 6300 additional units and Option B a total of 6500, whereas the required number, according to information provided by the Council, is 6,000 (which in itself is considerably more than the number initially indicated) - a discrepancy in the Council’s own calculations of either 300 or 500 (unrequired) units.</p> <p>A realistic reassessment of the number of housing units planned for Wyre Forest should now be completed. This should not be influenced by (1) pressure from developers and/or other local authorities, (2) political considerations, (3) convenience/relatively low cost of developing ‘open’ land or (4) the opportunity to make ‘quick money’ from the ‘new homes bonus’ promised by the Government, which takes no consideration of actual need. None of these influences should have any</p>	<p>their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology. 1100</p>

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				<p>bearing on the calculation.</p> <p>If Councils wish to protect Green Belt, they do have scope to reduce housing numbers, according to research carried out by the Campaign to Protect Rural England. The Council must justify its 'housing need' figures.</p> <p>The Council has potentially over-estimated the number of affordable units required in Wyre Forest. Inwards migration from the West Midlands conurbation has significantly reduced in recent years, possibly as the result of substantially increased transport costs. A calculation will presumably have been based on existing requirements and will take no account of probable depopulation of young people from an area which, despite determined efforts, has been unable to attract industry or commerce and particularly to its town centres; nor will account have been taken of the potential effects of Brexit.</p> <p>Future housing requirements, as assessed by the Council, do not appear to have taken consideration of the availability of a substantial number of houses, when residents determine to sell up and move out of the district. This will happen, as a direct consequence of the Council's proposed development of Spennells as an urban sprawl/mega-estate and the expectation of a dramatic deterioration of quality of life. This would</p>	

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				<p>significantly reduce the requirement for new build units.</p> <p>Future housing and infrastructure needs have probably been significantly over-estimated. Outward movement of population, particularly of young people should be taken into account, as should the probable/potential effects of Brexit.</p>	
	<a href="#">LPPO4775</a>	6.6 Housing Need	Object	<p>The population projection in the Draft Local Plan is exaggerated and a realistic requirement of 3,000 homes to 2034 can be met on brownfield sites – thereby avoiding encroaching on Green Belt during this period.</p> <p>Should the need for housing still be accepted to be 6,000, brownfield sites should be used first, as the Council only needs to guarantee an ongoing 5 year housing supply.</p> <p><b>Population Growth Projection and Housing Need:</b> The guidelines set out in the National Planning Policy Framework states that we should consider only future scenarios that could reasonably be expected to occur. The population of the Wyre Forest has only grown slightly since 1991 and remains fairly static. After a decade with a population increase of only 1.1% between 2001 and 2011, the population then only increased by a further 1.1% from 2013 to 2015. This</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>



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				<p>equates to a 2.7% increase in population growth from 2001 to 2015 (point 2.3 of the Objective Assessment of Housing Needs 'OAHN' Report May 2017).</p> <p>The National Statistics Sub National Population Projections (SNPP) 2014 evidences a growth of population for the outlook period at 4.7% with a requirement of only 199 dwellings per annum. This is significantly less than the projection in the WFDC Local Plan Review which states the need of 300 dwellings per annum (this must be based on a 7.7% increase). This would give us a <b>285% higher rate of growth than in the last 10 year period which is completely improbable.</b></p> <p>If we used the SNPP recommendations for building 199 dwellings per annum over the stated 15 year period, we only need to build 2,985 dwellings in total - which negates the need to take Green Belt land around the District and reduces the WFDC consultation figures by 2,415 houses.</p> <p>The consultation document (section 6A) assumes 300 dwellings per annum should be required, but even the PG Short Term Data shows an increase of 5.8% which is twice the growth of the last 15 year period and still only has a need for 229 dwellings per annum. This is 1,278 dwellings <b>less</b> than currently assumed.</p> <p>No allowance has been made for the age profile of the Wyre Forest population leading to increased mortality rates and hence increased availability of property in the district. It is likely that many properties will come</p>	

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				<p>free over the next 15 years as people downsize, move to care homes, live with children outside the area or die.</p> <p>I firmly believe that growth figures will be less than 5.8% based on national projections and taking account of the recent cutbacks in the carpet industry in Kidderminster. Along with the forthcoming government attempts to reduce immigration, this will bring the figure close to the 2.7% experienced over the last 15 years.</p> <p>The OAHN Report says that the number of vacant properties in the Wyre Forest is 3.2% and that there are currently 44,490 dwellings in the area. The Report increases the allowance for vacant properties to 4.5%. Increasing the vacancy rate by 1.3% means that the housing demand has been unnecessarily increased by 578 dwellings (or 39 per annum).</p> <p>Consequently, the need for new dwellings in Wyre Forest up to 2034, will realistically be under 3,000 and therefore the need to use any Green Belt land is unnecessary.</p> <p>A realistic requirement of 3,000 homes to 2034 can be met on brownfield sites.</p> <p>According to the statistics on page 39, there is a total of 967 dwellings completed or with planning permission granted on brownfield sites, with a further 1,193 proposed by the plan on other brownfield sites.</p>	

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				350 dwellings are also proposed on greenfield sites not in the Green Belt and 796 dwellings can be placed on previously built Green Belt land including 600 of these at Lea Castle. This makes a total of 3,306 dwellings. This exceeds the number of houses needed for the 15 year land supply (when using the SNPP figures of 199 p.a. as detailed in 1c above) without the need to use Green Belt at all.	
	<a href="#">LPPO4788</a>	6.6 Housing Need	Object	<p>Revisit WFDC’s figures for projected housing requirements in Kidderminster as the figures do not equate with WFDC review which quotes “<i>virtually static</i>” growth in the local population.</p> <p>The Amion Report on which figures are based states that the number of houses it recommends per year (which is 254 not 300 as WFDC) would be “<i>capable of absorbing the scale of numbers likely to be involved</i>” in “<i>an identified shortfall of provision in the Greater Birmingham HMA</i>”.</p> <p>Without this provision to accommodate Birmingham overspill the figures required for future growth in Kidderminster would be lower and could be addressed via use of Brownfield sites.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<a href="#">LPPO4800</a>	6.6 Housing need	Object	The data put forward by WFDC in terms of future housing requirement is in direct contradiction of the actual population growth recorded over the recent decade. The actual population has risen at a much	Objection noted.

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				lower rate than the forecast for future housing would have us believe.	
	<a href="#">LPPO4836</a>	6.6 Housing Need	Object	<p>Although the DCLG Housing statistical release dated 12 July 2016 has a projected national increase in the number of households of 19% between 2014 and 2034 the population of Wyre Forest District rose by 1.1% between 2001 and 2011 and has remained fairly constant since 2011. Although projected population increase lags behind projected households it is not clear that there will be a demand for an additional 6000 houses in Wyre Forest by 2034 unless it is coming from elsewhere.</p> <p>I am not aware of the reasoning for the need for more housing in Wyre Forest where the population has been stable for some years. Obviously there must be some, but as a dormitory estate for Birmingham and the Black Country it calls into question incompatible requirements with respect to sustainable development.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<a href="#">LPPO4882</a>	6.6 Housing Need	Object	<p>Having reviewed extensive report prepared by WFDC, it presents numerous facts and figures, based on 'independent' assessments including OAHN report (estimating how many houses might be needed), however, it seems to have significantly exaggerated the number of new houses actually required, which would then encroach onto Green Belt sites, when compared with the HELAA report. The HELAA tables A-I</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was</p>

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				<p>show 4475 available sites before using Green Belt. And table J - Green Belt greenfield sites 2278.</p> <p><b>Future Requirements:</b></p> <ol style="list-style-type: none"> <li>1. OAHN Report (SNPP-2014 figures) calculates that 199 houses per year (for 18 years) are required(= 3,582).</li> <li>2. The Planning Review states 300 house <i>pa</i> (= 5,400), which appears to be based on a population growth (PG) in excess of 8.1% (PG-Long-Term-X). Why plan to build an extra 1,818 dwellings, when it is not required?</li> <li>3. Your review is using PG assumptions that are not relevant to the real expectation and requirements of this area.</li> <li>4. There are currently 46,260 properties in WFDC (in 2015- Table 6.1). The OAHN reports states a vacant property rate of 2.6% (= 45,044 occupied vs 1216 unoccupied houses). Why can't we use these unoccupied houses?</li> </ol> <p><b>Population Growth</b></p> <ol style="list-style-type: none"> <li>1. Since 2001, this has grown 2.7% in Wyre</li> <li>2. This compares with a national average in England of 10.8% (hence not relevant to our area)</li> <li>3. SNPP-2014 figures predict a PG of 4.7%, this is</li> </ol>	<p>consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>

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				<p>almost double the historical figure.</p> <ol style="list-style-type: none"> <li>4. The effect of Brexit, is likely to mean that this will fall further (assuming that some of our European population will go back to their homeland).</li> <li>5. Wyre Forest has a current population of 99,503</li> <li>6. If we predict that the next 18 years will bring the same PG (although in reality it is likely to be less), then this is an extra <math>(99,503 \times 2.7\%) = 2,686</math> people by 2034.</li> <li>7. The average no of people per household is 2.2 people per house.</li> <li>8. Based on a PG of 2.7%, this means that we would need 1,221 extra houses during the next 18 years.</li> <li>9. Based on a PG of 4.7%, this means that we would need 2,126 extra houses in the next 18 years.</li> </ol> <p><b>Realistic Requirements Compared to WFDC Planning Review 2016-203</b></p> <p>To summarise Population Growth and Housing Requirement</p> <ul style="list-style-type: none"> <li>• Your WFDC Planning Review requires 5,400 homes (300 p/a).</li> <li>• SNPP-2014 figures estimates that 3,582 are</li> </ul>	

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				<p>required (199 p/a)</p> <ul style="list-style-type: none"> <li>• If PG is estimated at 4.7% (SNPP-2014), we would require 2,126 homes.</li> <li>• If PG is estimated at 2.7% (historical), we would require 1,221homes.</li> <li>• Compared with the SNPP-2014 figure you have over stated the amount housing required by at least an extra 1,818 homes.</li> </ul> <p>To summarise site availability within the WFDC area:</p> <ul style="list-style-type: none"> <li>• There are 4,475 sites available before you need to use Green Belt green field land (ref HELAA report).</li> <li>• We already have 1,216 unoccupied houses (OAHN report)</li> <li>• Non Green Belt 4,475 +unoccupied 1,216 = 5,691 total availability, this even meets your exaggerated figure of 5,400, hence Green Belt greenfield sites are not required to be built on, to meet the extra housing required.</li> </ul>	
Hardwick & Prosser	<a href="#">LPP0720</a>	6.6 Housing need	Comment	The draft policy appears to fail to deal with any issues of unmet housing need from the wider area and/or neighbouring authorities. There should be provision for adjustment of figures to allow the Local Plan to effectively address any issues which arise and a commitment to meeting the specified housing	Although Wyre Forest District is its own housing market area, WFDC continues to undertake Duty to Cooperate discussions with its neighbouring Local Authorities during the Local Plan Review process to ensure NPPF

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				requirements by the end of the plan. Ideally the a local authority should be treating housing requirements for the area as a minimum and commit to fulfilling the requirements by 2034 to in order to boost housing supply as is a requirement within the NPPF. The plan should demonstrate that minimum targets should be met and exceeded during the plan period as well as continuing to keep an up to date five year housing land supply. There should ideally be a policy within the Local Plan which sets out measures to ensure that the latter is sustained and not simply state that "sufficient" land will be provided to meet such needs.	requirements are met.  Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO478</a>	paragra ph.6.6	Comment	I do not believe that Wyre Forest District needs 300 more properties per annum. Also as there is a need for 540 elderly persons accommodation, I believe that a development like some of the developments in Birmingham which are more like village communities where there is a Doctors surgery on site would be more suitable on the Lea Castle Hospital site than 600 houses/flats.	Comments noted.
	<a href="#">LPPO2006</a>	Housin g Need	Object	The Wyre Forest population growth is below national average I quote "Assessing development needs should be proportionate and doesn't require local councils to consider purely hypothetical future scenarios only future scenarios that could be reasonably expected to occur". The Plan refers to virtually static population growth...are we therefore being asked to be an overspill from the Birmingham conurbation? The town	Objection noted.  The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was



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				is full of empty shops, we need to look at this for our own town before we start housing for another area? We do need better housing for some, new start homes but with so many brown field sites in this area this can be accommodated without touching very precious Green Belt. The suggested demand does not exist.	consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO1940</a>	Housing Needs	Comment	I believe that there are miscalculations concerning the number of houses required in this area, the population of this area has remained fairly static in recent years, the growth of population appears to be exaggerated and does not seem to be based on evidence. Is it practice to overestimate numbers so that they might be reduced in the future giving the appearance of giving some concession to the public?	The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036. There will be a marked increase in the number and proportion of older residents. The population aged 65+years is expected to increase by 28.1% from 24,200 in 2016 to 31,800 in 2036. (Data based on ONS 2016-based Subnational Population Projections).  This suggests that the population is not 'static'. For further information please see the updated OAHN Study which will be published on the Council's website during the Pre-Submission consultation.
	<a href="#">LPPO2172</a>	Housing Need	Comment	I would also challenge the population forecast in this review as the Worcestershire County Council web site states that the population growth in this area has grown by 1200 people between 2001 and 2012. Is there a demand for the proposed number of houses?	Comments noted. The proposed development requirement is based on the housing need for the District. This housing need was evidenced in the OAHN study published in April 2017.

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				As it is at the moment we have a town centre that is in decline with many empty shops and industry cutting jobs. Who would want to move into a town as it is at the moment?	Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO2185</a>	Housing Need	Comment	I do not believe the numbers of proposed growth within Wyre forest require the need for the number of homes provided.	Comments noted.
	<a href="#">LPPO2348</a>	Housing Need	Object	<p>We believe the proposed build of 6000 units is excessively ambitious and consider hardly any Green Belt needs be touched.</p> <p>WFDC assessment of the housing needs looks quite flawed and we believe the numbers in the report cannot be substantiated. We think the requirement for accommodation will be in the region of 3000 not 6000 units. 3000 units can be completely be accommodated within Brown Field sites without the vast removal of swathes of the Green Belt.</p> <p>The WFDC Local Plan is flawed and should be reviewed, revised and if required withdrawn.</p> <p><b><u>Wyre Forest Objective Assessment of Housing Need report</u></b></p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				<p>1. We believe the Wyre Forest Objective Assessment of Housing Need (OAHN) report is flawed, not fit for purpose and not objective. Our population has been virtually static since 1991 (confirmed by the Local Plan consultation section 2.2). It has only grown since 2001 to 2015 by 2.7% (compared to West Midlands growth of 8.9%). The population of Kidderminster in 2015 is stated to be 56,185, (55,530 in the 2011 census). This local plan allows for an increase of over 18,000 people in the area, a massive increase in local population. This increase is certainly not from organic growth so where are the additional people coming from and what would attract them to the area? One can only assume that they will be coming into the area from further afield.</p> <ul style="list-style-type: none"> <li>○ The ONS Sub National Population Projections (SNPP) 2014 evidences a growth in population for the outlook period of 4.7% and a requirement of 199 dwellings p.a. i.e. a reduction of 1818 dwellings over the 18 years bringing the total down from 5400 to 3582. Allowing for some flexibility shows a population growth of 5.8% and requires 229 dwellings p.a. i.e. a reduction of 1278 dwellings over the</li> </ul>	

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				<p>outlook period.</p> <ul style="list-style-type: none"> <li>○ The plan figure of 300 dwellings p.a. appears to be based on a population growth rate of 7.7% which is a ludicrously 285% higher than the last 14 years which for the UK generally has been driven by immigration which will slow now the UK is leaving the EU. One could argue the SNPP figures are too high.</li> <li>○ The vacant dwelling rate between 2005 and 2015 (OAHN page 33) has been at its highest 3.5% (2007, 2008, 2009) to its lowest 2.6% (2015). The report assumes a vacant dwelling rate of 4.5%. As at 2015 it was 2.6% therefore the report is over egging the figures somewhat by 879 dwellings (Total dwelling stock of 46260 dwellings x 1.9% (1.9% being the difference between actual 2.6% and the reports assumed 4.5% which has never been reached in the last 10 years).</li> <li>○ Considering the above gives a requirement for <b>3243 dwellings</b> over the outlook period 2016 – 2034 but based on a growth in population running at <b>215%</b> more than the current</li> </ul>	

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				<p>trend with predictions evidencing a slowdown in immigration population growth since the vote to leave the EU.</p> <ul style="list-style-type: none"> <li>○ If the current trend of around 2.6% growth is followed, the accommodations to be provided is around <b>3000 dwellings</b> in the outlook period.</li> <li>○ <b>We recommend Option B is followed but the numbers are reduced and Green Belt need not be used, see the table on page 6. Brownfield sites should be developed first.</b></li> <li>○ The HELAA report indicating availability of land to build upon highlights some inconsistencies and proves that no Green Belt land needs to be built upon:</li> </ul> <p><b>Table No</b></p> <p><b>A</b> Sites under construction at 01/04/16 – Large S</p> <p><b>B</b> Sites with non-implemented planning permiss</p> <p><b>C</b> Other deliverable sites within 5 years</p> <p><b>D</b> Urban Brownfield Sites delivered beyond 5 ye</p> <p><b>E</b> Urban Greenfield Sites deliverable beyond 5 y</p> <p><b>F</b> Rural Brownfield Sites deliverable beyond 5 ye</p>	

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				<p><b>G</b> Rural Greenfield Sites deliverable beyond 5 years 681 3696</p> <p><b>H</b> Green Belt Brownfield Sites deliverable beyond 5 years 779 4475</p> <p><b>I</b> Green Belt Greenfield Sites deliverable beyond 5 years 8377 12852</p> <p>Sum A – F and this delivers 3015 units, exceeding the requirement of 3000 in section 1.5 above; then no Green Belt land is touched at all.</p> <p>Sum A – G, including now the Rural Greenfield Sites and this delivers 3696 units, well in excess of the requirements in section 1.4 above.</p> <p>Sum A – H, including now the Green Belt Brownfield Sites and this delivers 4475 units, well in excess of the requirements in section 1.4 above.</p> <p>No Green Belt Greenbelt Greenfield Sites need to be considered.</p> <ul style="list-style-type: none"> <li>The planners should not be misled by the OAHN report and a further more realistic review of housing needs is required.</li> </ul>	
	<a href="#">LPPO1843</a>	Housing Need	Object	The figures which have been quoted for the requirement for future housing needs do not agree with known figures projected from census figures. The Council do not quote their data source used for	The Objectively Assessed Housing Needs (OAHN) Study is the evidence base for the housing requirement.

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				<p>predictions therefore one can only assume that these are incorrect and vastly inflated, and all future needs can be met from the use of brownfield site development.</p>	<p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<p><a href="#">LPPO2782</a></p>	<p>Housing numbers</p>	<p>Object</p>	<p>It is self- evident that the Plan assessment of housing needs has been based on a projection of population growth that is not borne out by the Government’s Office of National Statistics projection for the Wyre Forest. The latter show that over the planning period the population of Wyre Forest will increase approximately by only 5% from 99,000 in 2016 to 104,000 in 2034. However the Planners have accepted, without apparently questioning, the higher projection given by the Amion and Edge Consultants i.e.: 8.1% growth, a degree of growth that has never been achieved in the Wyre Forest.</p> <p>This difference in projected population growth will impact on the number of dwellings required to be</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>built. Based on 5% the annual requirement would be 199 dwellings - a total of only 3582 over the planning period — but based on 8.1% the annual requirement is raised to 291 dwellings — a total of 5238 over the planning period. Over and above this, the Plan has added more contingency to the latter figure raising the number of dwellings at first to 5400 and then again to 6(X)0, an increase of nearly 2500 (+67°Ai) over the SNPP —2014 figure of 3582.</p> <p>There is also an ageing population in Kidderminster so it is reasonable to assume that as old people downsize; move into care homes; move outside the area to be nearer to family; or sadly die, more vacant properties should become available in the Plan period under review.</p> <p>It is also important to note that in the Worcestershire Local Transport Plan 2017 2030, dated as recently as December 202016, it stated that “The Wyre Forest District Site Allocations and policies local Plan 2006-2026 seeks to allocate 4000 dwellings from 2006 to 2026. However, as of April 2013, 2869 homes have already been supplied, therefore only 1131 are required to be built up until 2026.” This makes the figures quoted in the local Plan Review even more questionable.</p> <p>If Planning is assuming that the increase in population</p>	



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				<p>is because Wyre Forest (and Kidderminster in particular) is being designated as a catchment area for potential over spills of population from Birmingham and Solihull then such an objective should have been clearly stated in the Plan so that a full consultation on this disturbing issue can be made.</p>	
	<p><a href="#">LPPO3710</a></p>	<p>Paragraph 6.6</p>	<p>Object</p>	<p>Overall (my comments on more specific areas of the report are provided after this initial comment below)</p> <p>The Objective Assessment of Housing Need (OAHN) which underpins the Local Plan Review (LPR) has weaknesses and is not wholly objective. I therefore object to the number of houses proposed as the figure is much higher than necessary. With this in mind, the amount of green belt proposed to be consumed is needless.</p> <p>At OAHN Appendix G stage 1 the figure of 1,726 for current need is based upon assumptions at G2.5 and G2.6 and the overall figure is based upon a grossed-up breakdown from a sample of just 39% of the housing register.</p> <p>These assumptions erode confidence of the proposed scale of development and so object to this.</p> <p>At G2.7 a claim is made that ‘Having established the scale of need in Steps 1.1, 1.2 and 1.3, total current</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>housing need from existing households across Wyre Forest ... is 2,245' is completely unsound and unjustified. There is no clear line of sight as to how this figure has been obtained from objective evidence and therefore the OAHN is flawed. There is no objective establishment of the scale as incorrectly claimed within the statement. Furthermore, there is no clear line of sight as to how the figure of 76.9% has been shown to be derived and what lower quartile house prices figure has been used in this calculation.</p> <p>At G2.2 the OAHN states that the scale of need by homeless 'households can be derived from several sources', but it is not clear which source has been used for the figures within the report nor whether the 68 households quoted separately have been double counted within this assessment.</p> <p>At G3.2 I do not see a right to those that have made a free decision to form a new household for the costs involved to be picked up by the tax payer with free accommodation. It is clear that the households should not be formed unless they can live within their means and do not burden the community with cost. The situation is of their own making and so can be dealt with by staying with family and friends. The statement that 'The housing register reports a total of 574 newly-forming households...' is inconsistent with statements made at G1.4 where the figure has actually been</p>	

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				<p>grossed up from a breakdown derived from 1305 households on the register. There is scope for this figure of 481 households to be reduced here.</p> <p>At G4.4 the OAHN states that 2% vacant stock is acceptable. I object to this number as this is valuable inefficient use of housing stock. Ordinary households manage to move home without there have to be a stock of vacant property so why shouldn't the Council be able to operate at this efficient level? This would reduce the pressure in green field development and is not justified. A figure should be included at stage 3.2.</p> <p>At G4.5 the OAHN includes objective data over the period April 2010 to Sept 2015 that reduced the overall imbalance to 120 each year yet has not been taken into account within the assessment due to the numbers being a prediction. I object because this approach is inconsistent with the rest of the report where most of it is a prediction through to the year 2034. At just 120 affordable dwellings – this can be accommodated within current brownfield and other inner town sites that do not involve building on green field. A figure should be included at Stage 3.3.</p> <p>At G4.7 the OAHN assumes that 1192 affordable rented dwellings are available over the five-year period yet G4.5 is inconsistent with having a prediction not</p>	

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				<p>included within the modelling work.</p> <p>Stage 3 does not take into account of the 1201 existing households living in other tenures. This is clearly a dwelling supply and should be taken into account. The 1192 figure should therefore be considerably increased. The annual supply has been artificially reduced in the OAHN and should be revised, therefore I object.</p> <p>At G4.9 again, an assumption is made for the annual capacity of new tenant lets yet G4.5 makes no comparable assumption for consistency. If an assumption can be drawn at G4.9 then an assumption can similarly be drawn at G4.5. Therefore I object.</p> <p>At paragraph 5.3 within the OAHN, this solely refers to the Edge Analytics in drawing to conclusion the housing need referring to Fig 4.10. The assumptions embedded within the Edge Analytics is upper-bound and does not reflect previous historical performance of the town that is the norm for the size, location, setting and environment of the district.</p> <p>Third party analysis of Oxford Economics, Experian, Cambridge Econometrics are simply dismissed by the report in favour of the Council's commissioned Edge Analytics. The previous three assessments average as zero growth in housing demand. Edge is out of line,</p>	

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				<p>making very optimistic assumptions to derive development scale that simply does not align with historic development in Kidderminster.</p> <p>At paragraph 5.5 within the OAHN, the breakdown of the OAHN figure of 300 is unsubstantiated and does not connect with the figure of 229 derived earlier. I therefore object to the analysis.</p> <p>At paragraph 5.11 within the OAHN, the report states that there is an intention to attract people to the area at the expense of green belt. I object to the needless expansion of a town that has no business case in support as to the type of skills required. There appear simply to hope for the best. In reality, these peoples will be attracted from the West Midlands to cheap housing and then commute to better paid jobs outside the region. They are most likely to shop outside of the district and so bring little to the town.</p> <p>At paragraph 6.13 within the OAHN, there is disconnect with the previous housing strategy of 200 dwellings/yr where there had been no overall undersupply at this level. This supports a much smaller scale of development than that proposed now.</p> <p>At paragraph 6.14 within the OAHN, this concludes that there is no need to adjust the dwelling</p>	

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				<p>requirement.</p> <p>With so many areas within the report that are lacking detail and objective evidence, the Council has failed to inform properly the Wyre Forest community to allow proper consultation and decisions to be reached.</p> <p>The level of development is entirely dependent upon the OAHN which uses subjective assumptions to derive the recommendations. The document has no clear line of sight from its source data to its final conclusions bringing in figures at table G1 without justification.</p> <p>I therefore object to the scale of development and the consumption of valuable green belt.</p>	
	<a href="#">LPPO3967</a>	Paragraph 6.6	Object	<p>The guidelines set out in the National Planning Policy Framework states that we should consider only future scenarios that could reasonably be expected to occur. The population of the Wyre Forest has only grown slightly since 1991 and remains fairly static. This equates to a 2.7% increase in population growth from 2001 to 2015.</p> <p>The National Statistics Sub National Population Projections (SNPP) 2014 evidences a growth of population for the outlook period at 4.7% with a requirement of only 199 dwellings per annum. This is significantly less than the projection in the WFDC Local</p>	<p>Objection and comments noted.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>Plan Review which states the need of 300 dwellings per annum (this must be based on a 7.7% increase) especially as you suggest that these houses are only for existing residents of the local area.</p> <p>If we used the SNPP recommendations for building 199 dwellings per annum over the stated 15 year period, we only need to build 2,985 dwellings in total - which negates the need to take Greenbelt land around the District and reduces the WFDC consultation figures by 2,415 houses. This would save and protect vital greenbelt land in the area, something that the local council proposed that they were advocates of during the recent general election.</p>	
	<a href="#">LPPO2823</a>	6.6	Object	<p>The Council has manipulated the figures against independent analysis. In respect of affordable housing stock the OAHN says 229 at G1.4, 100 at para 5.9 and the Council says 90 at its Local Plan Review at para 6.4., so this is open to challenge.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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	<a href="#">LPPO3616</a>	Paragraph 6.6	Object	<p>The WFDC Local plan states that 300 houses per annum need to be built to cover the growing population in its area. It also covers the migration of overspill that needs to be considered from the Birmingham &amp; Solihull area. As the population has grown very little between 2001-2015 (1000 approx.) where have the figures come from to justify the amount of houses the WFDC recommends?</p> <p>In a report conducted by Amion for the WFDC. It recommends that 254 houses per year for 20 years were required as a guideline. So why are WFDC recommending 300 houses per year when the Amion report was confident that the migration to the area could be absorbed in their figures?</p> <p>WFDC local plan has also estimated a 6000 population increase by 2034 when as they state in their report population only increased by 1000 approx. between 2001-2015. It states in the local plan this was derived by carrying out an assessment in accordance with the National Planning Policy Framework (NPPF). The guidance on the Housing and economic development needs 2015 states "<u>Assessing development needs should be proportionate and does not require local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected</u>". How have WFDC come up with the extra 5000 people when population has been</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>



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				<p>relatively stagnant for all those years?</p> <p>The Objectively Assessed Housing Needs (OAHN) states that <u>the census is a relevant source</u>, which would be the most accurate measurement of growth within the Wyre Forest over the last 15 years. So why has the WFDC chose to ignore these figures and use national and regional figures instead. If the census figures were used then a total growth of around 3000 would be more accurate and could be accommodated within brownfield sites. Also in the WFDC local plan it does say “<u>All population growth is to be achieved naturally, with no net inflows</u>”. Surely that contradicts all the figures the local plan states.</p> <p>So to conclude the Housing section I think the WFDC local plan is fundamentally flawed and needs to be thoroughly looked into again and figures recalculated.</p>	
	<a href="#">LPPO3663</a>	6.6	Object	<p>6.5 – 6.7 You have not shown the evidence and justification for the need for 5400 homes and 540 care homes from the local region. It is inevitable that these homes will be populated from in migration throughout the UK and will commute out of the region.</p> <p>OAHN:</p> <ul style="list-style-type: none"> <li>The assessment of housing need at table G1 stage 1 shows a total current needs</li> </ul>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating</p>

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				<p>requirement of 1726 households at Step 1.4A. There is no direct line of sight as to where this figure has come from within the evidence based document</p> <ul style="list-style-type: none"> <li>• The document is therefore not objective and is misleading to the consultation. Extra time is therefore needed for the consultation to review the objectivity of the document and assess how the figures have been derived. It is further noted that detailed information from just 39% of the households on the housing register and has been grossed up to the 3308 on the housing register this is open to error and assumptions drawn to make this assessment and not objective. The breakdown is derived from just 39% sample and not definitive.</li> <li>• The figures relied upon have been grossed up from a small sample. There is potential for error. All should have been contacted as they are on the electoral register the details will be available.</li> <li>• Clearing the housing need entirely will simply draw into the area from outside those that perceive quicker access to housing in Wyre Forest compare to other areas and so join the housing register creating more demand that is unsustainable. Acting like a magnet for housing need from other areas.</li> </ul>	<p>housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<ul style="list-style-type: none"> <li>• Step 2.1 – there is no guarantee that the figure of 574 for new household formation can be guaranteed each year until 2034.</li> <li>• Step 2.2 – no clear line of sight within the document as to where the percentage of 83.7 has been derived. If this was 60.1%, this would reduce the number of new households requiring affordable housing to just 345 and therefore the supreme new affordable and social housing requirement of zero.</li> <li>• The stakeholders in this report do not back up Wyre Forest need for new Housing.</li> <li>• A4.5 – A4.7 Stakeholders consulted. One stakeholder commented on a recent slowing down in the market, with low levels of mortgage applications. They considered that future trends will be determined by “market forces, Government schemes, impact of RTB and mortgage availability”.</li> <li>• 8.6 We propose that the OAHN should be 300 dwellings per annum. This figure sits at the upper end of the dwelling requirements suggested by the various demographic scenarios that have been developed and the component key variables regarding migration, headship rates and economic activity.</li> <li>• Why use upper end –why use worst case scenario- the research and rest of the report do not substantiate why use the upper end?</li> </ul>	

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				<ul style="list-style-type: none"> <li>8.8 Housing market signals suggest that the housing market in Wyre Forest is relatively stable. There are currently no indicators suggesting a need for adjusting the housing dwelling requirement on the basis of market signals.</li> <li>The report is not fit for purpose, it is not objective. The plan should not go ahead.</li> </ul>	
	<a href="#">LPPO4031</a>	Paragraph 6.6	Object	<p>I believe the number of properties required in the Wyre Forest from 2019 to 2034 has been vastly over-estimated by both the Objective Assessment of Housing Need (OAHN) by AMION and the Local Plan Review ( the Wyre Forest housing requirements has only grown by 1000 in the last 15 years )</p> <p>I would like to challenge:</p> <ul style="list-style-type: none"> <li>the number of houses you are claiming are required per year and in total until 2034</li> </ul> <p><b><u>Number of Houses Required</u></b></p> <p>The number of houses required in the review are based on figures from the Objective Assessment of Housing Need (OAHN) by AMION and then adjusted upwards by yourselves in the review</p>	<p>Objection noted. The statistics used for the OAHN are statistics published by the Government from the Office of National Statistics.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				<p>With the AMION report are the following statements:</p> <ul style="list-style-type: none"> <li>• the latest 2015 mid-year population estimate (MYE) for Wyre Forest suggests a population of just over 99,500, a 2.7% increase since 2001</li> <li>• International migration has, in recent years, contributed little to population change in Wyre Forest</li> <li>• there are some 44,490 dwellings in Wyre Forest District of which 1,404 are vacant</li> <li>• Wyre Forest is a largely self-contained housing market area (HMA)</li> <li>• the net imbalance is 229 dwellings each year.</li> </ul> <p>and within the AMION report is an "edge analytics" report:</p> <ul style="list-style-type: none"> <li>• the population of Wyre Forest is expected to increase by 5.9% between 2014 and 2039, equivalent to an additional 5,880 people (edge analytics report) estimate = 4000 from 2017 to 2034</li> <li>• estimates that the number of households will increase by 4,294 over the 2014–2039 projection period, equivalent to an additional 172 households per year (edge analytics report) = 2400 from 2017 to 2034</li> <li>• The DCLG household projection, underpinned by the latest ONS population projection,</li> </ul>	

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				<p>provides the ‘starting point’ in the assessment of housing need (PPG paragraph 2a-015). For Wyre Forest, the 2014-based household projection model suggests an increase of 3,422 households, approximately 190 per year over the 2016–2034 plan period.</p> <ul style="list-style-type: none"> <li>• Edge Analytics has used POPGROUP v.4 technology to develop a range of demographic scenarios for Wyre Forest using the latest demographic statistics. In line with the PPG, this suggests that over the 2016–2034 plan period, the number of households in Wyre Forest will increase by 3,422 (8%),</li> </ul> <p>The Local Plan Review states in Table 2.0.1:</p> <ul style="list-style-type: none"> <li>• Virtually static population growth</li> <li>• The District has a low level of in-migration</li> </ul> <p>The Wyre Forest District Council Housing Land Availability Report October 2016:</p> <ul style="list-style-type: none"> <li>• states in Table 6 that land is already allocated for 1976 properties for the next five years</li> </ul> <p>So these statements indicate an annual requirement of between 190 and 229 new properties. These figures include in-migration , out migration, deaths and births.</p>	

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				<p>Despite these calculations AMION in their conclusions in section 8 propose that the OAHN be 300 per annum which is a worse case scenario. This is because they have run various "models" against their own calculations and have chosen to take the highest.</p> <p>Then in the Local Plan Review sometimes uses a figure of 5400 ( which is 18 x 300 ) but in 6.0.5 uses 6000.</p> <p>In addition in the Local Plan Review the figures in tables 6.0.3. and 6.0.5 do not make sense when correlated with the tables in 31.0.1, 32.0.1, 33.0.1 and 35. I strongly recommend these are looked at urgently as I arrive at a figure for Core Sites of 3563 ( including Lea Castle ) and you are using 1918 ( excluding Lea Castle ) in 6.0.5 which gives a discrepancy of over a 1000 in your figures where ADDITIONAL need for properties is not required.</p> <p>I strongly believe that the housing need projection is exaggerated and a realistic housing need can be met on Brownfield sites.</p> <p>The population of Wyre Forest has grown by only 1000 in 15 years, the housing need projection is exaggerated and a realistic housing need can be met on Brownfield sites. The Local Plan Review itself states "Virtually static population growth".</p>	

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	<a href="#">LPPO3783</a>	6.6	Object	<p>Having read LTP4, Green Belt Review and now the Local Plan Review I must conclude the statistics for housing requirement quoted within the documents commissioned are not accurately substantiated and, as such, should be challenged by WFDC before any decision on release of any Green Belt made. Wyre Forest has had a ‘virtually static population growth’ since 2001-2015 (2.2% at most using ONS statistics). Looking at the population of Kidderminster alone, from 2001 -2011 it dropped by 0.14%. An increase from 2011 Census to current estimate of population set in 2016 of 2.1% at most. If the figures were accurately reviewed and if the true objective of the LPR is to meet future housing needs of Wyre Forest in line with current projected growth figures — all development could be achieved on brown field sites. It is therefore the duty of WFDC to ensure developers are not allowed to sit on brown field sites and that all development of brown field sites are completed before approving plans for green belt development.</p> <p>I believe the Local Plan Review to be a cynical attempt to provide a quick, unsustainable fix for the failing local economy - a wolf in sheep’s clothing. The LPR identifies a ratio imbalance of elderly to young and the increased impact that is having on services and ultimately finances of WFDC. The LPR identifies that educational standards within Wyre Forest are below that of national average — thus leading to low paid jobs and</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>



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				<p>zero hour contracts, with very little opportunity for home ownership and personal development. Health within Wyre Forest is generally poor and a proactive stance on high levels of obesity is required. The LPR should identify these problems as core issues that need addressing and not covering over with a temporary influx of cash. The LPR promotes actively pursuing in-migration to resolve such issues.</p> <p>Whilst the new homes allowance of £9,000 per unit is an attractive incentive and 1735 units will generate £15,615,000 for WFDC, this is a short-sighted answer to the long-term problems facing Kidderminster and Wyre Forest as a whole. The introduction of new residents alongside the initial flush of cash will place a burden on already over stretched services. Even considering additional council tax, the proposed development of 3 &amp; 4-bedroom family homes will not help balance the books.</p> <p>It is disingenuous to assume much of the aging population are not contributing to the local economy or are tying up family homes. My own family home will support three generations very shortly. My husband and I both work and run a small business, paying taxes at every level, not least business rates. We fall outside the optimum demographics laid bare within the LPR - which WFDC and their 'Pro Growth Agenda' are chasing. Are we to then interpret the LPR as saying in-</p>	

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				<p>migration (affluent) is the answer to supporting low paid, zero hour contracts and benefits, rather than WFDC addressing the root cause.</p> <p>In 2014 CPRE identified brownfield land within England on which to build 1,000 000 homes. The government's own office for national statistics shows only 537,080 homes have been completed. In October 53 authorities identified that 11% more housing could be built on brown field sites.</p> <p>The Green Belt, first introduced in 1935, but to England as a whole in 1955, was successful in putting in place a planning tool to prevent urban (and localized) sprawl. It is an effective method of ensuring towns and cities rejuvenate brown field sites to prevent slums. England is only covered by 13% of Green Belt so to lose 2% is a huge disservice to future generations. The Green Belt provides countryside up close for 30 million people.</p>	
	<a href="#">LPPO4304</a>	6.6	Comment	<p><b>Population Growth</b></p> <p>In the Local Plan consultation (2.2 'The Settlement Hierarchy') it is evident that the population since 1991 has remained fairly static, with only a 1.1% increase been seen in the 10 years from 2001-2011 and only a 1.1% increase from 2013-15, therefore it has only</p>	<p>Comments noted.</p> <p>The statistics used for the OAHN are statistics published by the Government from the Office of National Statistics.</p> <p>The OAHN follows the guidance for</p>

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				<p>grown 2.7% in 14 years from 2001-2015.</p> <p>Your report suggests the need of 5400 dwellings equating to 300 per annum and 540 for homes such as care homes, this is substantially higher than what the figures suggest. The SNPP (2014) projects a growth in population of 4.7% which would suggest 199 dwelling per year over the 18 years which is a 3<sup>rd</sup> less than the planned suggestion. This would equate to 3582* dwelling instead of 5400 and 30 for care taking this to 229 not 300.</p> <p>The growth rate that the plan suggest is 7.7% which is substantially different to that of the projected rate. Where are these people coming from as you identify our population as a key issue and challenge? The figures from the National Statistics, even though only projected are what we should be considering, it would be interesting to know where your data for 7.7% comes from? Bearing this in mind this is an inflated percentage and with only 3000 homes being needed it questions whether the need for Green Belt land is required or whether the development of Brownfield sites should be optimised to meet the demands of this District.</p> <p>I would suggest that the figures be revisited for consultation as they do not tally up.</p>	<p>determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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	<a href="#">LPPO4078</a>	Paragraph 6.6	Object	Further concerns are the accuracy of demographic assumptions made as a basis for the plan, and the employment prospects behind the assumptions for the longer term housing requirements.	Objection noted.  Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	<a href="#">LPPO4649</a>	6.6 Housing Need	Object	<p>It appears that there is consistently noted to be a need for a significant increase in housing in the Kidderminster and surrounding areas and this is the ‘identified need’ for sourcing additional land in order to allow large-scale development to meet this need. Having checked census figures from 2001 through to 2016, it appears that nothing much has changed regarding population; with a net increase of only c.1,058 people in 15 years. Obviously this increase does not require housing for each of these individuals as some will be couples and families moving into the area, or even existing Kidderminster residents increasing the number of people in their household.</p> <p>So, with this information to hand I cannot understand why the council feels that there is a case for decimating the Green Belt to provide this ‘much needed’ housing. It appears that it would be a way for landowners to make some money with no regard for</p>	It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.

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				<p>the structure of the area and any housing would actually attract more people to the area rather than dealing with the area’s actual need. From the proposed housing that we have been led to believe that would be built, would attracting large numbers of additional people, likely to commute (shop online, etc) and therefore not directly adding to the economy of the area be beneficial to the Kidderminster area, or just put a strain on already stretched services.</p>	
	<p><a href="#">LPPO4580</a></p>	<p>Housing Need</p>	<p>Object</p>	<p>I write in connection with the planning application for the Wyre Forest / Spennells.</p> <p>I strongly object to the development of building on Greenbelt land.</p> <p>The growth of population in the Wyre Forest has been quite static since 2001 only 2.1% increase. The figures show that the population growth between 2001 - 2013 is 1.1%</p> <p>Your figures are totally wrong and I feel that they need to be looked at before a decision is made.</p> <p>We have an aging population and the need for 3/4 bedroom houses is not needed. Figures show that housing requirement over a 15 year period is closer to 904 than the proposed figure of 6000. This means that you do not need to build on Greenbelt land. Please tell</p>	<p>The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036. There will be a marked increase in the number and proportion of older residents. The population aged 65+years is expected to increase by 28.1% from 24,200 in 2016 to 31,800 in 2036. (Data based on ONS 2016-based Subnational Population Projections).</p> <p>This suggests that the population is not ‘static’. For further information please see the updated OAHN Study which will be published on the Council’s website during the Pre-Submission consultation.</p>

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				<p>me where you have this 6000 figure from.</p> <p>There are enough Brown field sites in the Wyre Forest that can be built on for the amount of dwellings needed. For example the old magistrate’s court in Kidderminster can be converted into flats for the young or elderly.</p> <p>Population growth does not prove that we need to build on Greenbelt sites.</p> <p>Quote section 8.8:</p> <p>Housing market signal that the housing market in Wyre Forest is relatively stable. There are currently no indicators suggesting a need for adjusting the housing dwelling requirements on the basis of market signals.</p> <p>This is your own conclusion stating that there is no need for housing development.</p> <p>Your report and plans are not fit for purpose and the whole plan should be abandoned. Your figures are incorrect and over estimating by 1000's.</p> <p>Has there been any evidence about flood risk on the fields. I openly ask the question?</p> <p>On average 3 people live in a house - 2 adults 1 child so</p>	

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				3x 3000 = 9000 residents . Enough I would say.	
	<a href="#">LPPO4586</a>	Housing Need	Object	<p>In the decade following 1991 the population remained static with an increase of 1.1% in the following decade and a further increase of 1.1% 2013 – 2015. Overall there has been an increase of 2.2% in 26 years or less than 0.1% per annum. It is now widely accepted that population growth in the UK is now reducing as an effect of the referendum. (2.2)</p> <p>Currently the Options submitted outline a requirement of 5400 units (becoming 6000) or 300 units p.a. of which just 90 units p.a. will be affordable. There is no evidence whatsoever that there is a need for this number of units which appears to be based upon a population growth in the period concerned well in excess of 7% or considerably greater than has been the case in recent years.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<a href="#">LPPO4148</a>	Housing Need	Comment	<p>The OAHN should be reviewed and houses that are needed should be built on Brownfield sites and empty buildings should be used to provide affordable housing where possible.</p> <p>The OAHN Report is flawed. All figures have been rounded upwards. The use of 4.5% vacancy is out of date and should not have been used. The population growth figure taken by the OAHN has no basis in the</p>	<p>Comments noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published</p>

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				<p>reality of Wyre Forest. 2.1% is a far more realistic figure. The figures used to calculate the housing requirement have been deliberately maximised to produce the highest possible number of houses required. There are so many assumptions made and permutations shown.</p> <p>This means that the housing requirement over the 15-year period of the local plan is far closer to 904 than 6000.</p> <p>Rounding Up and varying numbers: If the OAHN report is accepted, then the requirement is calculated at 284 dwellings per year. The report then rounds up this number to 300 dwellings per year. This simple unjustified action requires the building of 240 houses over the 15-year period. In other words, a section of Green Belt land will be used for housing 240 houses purely because of a rounding up. Who does the rounding up benefit? The only viable conclusion is that it allows the developers. Why would Wyre Forest District Council take a decision which simply increases the profits of developers? Is the Council not here to serve the residents? Then we see the 5400 houses required (6.5 in Local Plan) increase to 6000 (Table 6.0.5) – another 11% increase and 333 houses per annum. What is the actual figure?</p> <p>Vacancy rate: The OAHN report says that the number</p>	<p>their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>



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				<p>of vacant properties in Wyre Forest is 3.2% It says that there are currently 44 490 dwellings in Wyre Forest. It then increases the allowance for vacant properties to 4.5 %. Whilst the 4.5% figure is taken from the 2011 census, WFDC is legally obliged to use the most up to date data available, i.e., the current Council Tax data. There is no logical reason to use the 4.5% figure instead of 3.2%. This means that an extra 578 dwellings (39 per year). In other words, because the OAHN consultants have chosen, without statistical justification, to increase the vacancy rate by 1.3%, 578 houses will be built on the Green Belt.</p> <p>The Assumptions: There are so many assumptions within the OAHN and the projected number of houses required differs greatly, the higher number (332) being an increase of 66% on the lower (199). The OAHN states that ‘the emphasis should be more towards the upper end of the ranges suggested’ for migration (the Long-Term scenario but including UPC), headship rates (the partial return headship rate - HH-14 PR) and (in the jobs-led scenario) economic activity (OBR2). This would equate to a maximum of 309 per annum (the PG-Long Term figure). Then there is a token gesture that some recognition should be afforded to the results of the analyses of the employment implications of the demographic scenarios (and vice versa) based on the economic forecasts and a final rounded number of a suggested 300 dwellings per annum. This</p>	

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				represents an uplift of 33% and 25% respectively on the SNPP-2014 demographic-based forecast results in a projected need of between 199 and 239 dwellings per annum (depending on the household formation assumptions adopted).	
	<a href="#">LPPO4400</a>	6.6 Housing Need	Object	<p>It is the considered opinions of those who have analysed the statistics in detail the Wyre Forest Housing Need report is flawed and only in the region of 3000 dwellings are required. In the main these could be met from Brownfield sites. This is fundamental &amp; needs re-examining by independent experts.</p> <p>I would also question whether there has been a rigorous enough assessment of Brownfield sites within the District.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>
	<a href="#">LPPO5152</a>	Housing	Comment	<p>Considering the large number of houses that have been built on brown field sites in recent years we are surprised that the Wyre Forest has been assessed as requiring so many dwellings in the coming years. We understand that independent consultants were used to assess the level of need but what were the sources used to secure this information?</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published</p>

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					their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO5128</a>	Housing numbers	Object	The build assumes an 8% growth population growth in Kidderminster over the same period that so far has only seen a 2% growth. This exaggerated 8% has no basis in the town or district's actual demographics or patterns since 1991. Population growth in Kidderminster over 2001-2016 was only 2.7 %.	Objection noted.  The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO4680</a>	6.6 Housing Need	Object	I would like WFDC to recheck their proposed housing figures. P14 of the WFDC report states that there is 'Virtually static population growth' so where exactly has the 6000 new houses been arrived at? Never before has WFDC been asked to accommodate so many new homes, and with Brexit, there will be even less in-migration than before, so levels should reduce not increase. I believe these figures are grossly over exaggerated. Are you being transparent and telling us	Objection noted.  The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG. Since the Preferred Options document was consulted on, the Government have published

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				<p>we are taking Birmingham overspill as nothing in your figures suggest the need for so many houses as stated? As below in my suggestions and your bullet point 3 below, we need to build more town centre apartments for the elderly, and not suburb housing as in Option A. Town centre Brownfield site regeneration must take priority for apartments. These would also require a smaller land footprint, meaning that WFDC could meet their demand with less land required.</p> <p>The OAHN Report which was used by you to arrive at the number of houses needed states that the census is a relevant source, which would be the most accurate measurement of growth within the Wyre Forest over the past 15 years. This is ignored and instead an arbitrary national and regional figure is used to arrive at the final growth rate. Wyre Forest has a population growth below the national average and within the Guidance on the Housing and Economic Development Needs assessments 2015, it states that “assessing development needs should be proportionate and does not require the local councils to consider purely hypothetical future scenarios, only future scenarios that could be reasonably expected to occur”.</p>	<p>their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<a href="#">LPPO4634</a>	6.6 Housing Need	Comment	For Kidderminster & Stourport the Local Plan seeks to bring in population from outside areas. Such a population would no doubt work outside the area adding to traffic pollution. New affordable houses	<p>Comments noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in</p>

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				<p>should be earmarked for local people trying to get on the property ladder.</p> <p>Restrictions should apply so the intended “local people” actually become the purchasers as opposed to those not intended for when built. Instead we predict the bulk of development will be 4/5 bedroom houses with tiny gardens i.e. providing larger profits for developers whilst ignoring what local people want. These developments provide little green space for community wellbeing and habitats for nature. Conversely, Bewdley, Chaddesley &amp; other villages are required to provide "housing to meet local needs." Why the difference?</p> <p>We question the need for 300 houses p.a. which is based on a growth rate of 7.7% &amp; not the actual 2.7% (2001-15) which is way below the national average used to arrive at the large figure required. The true figures based on Kidderminster's census figures could easily be accommodated in brown sites like Lea Castle.</p> <p>Furthermore these growth rates figures are based on assumptions prior to the Brexit vote which in the long term will impact reducing the migration of European people to this county that would have had a housing requirement. The predicted growth rates are fundamentally flawed in many ways meaning the migration to this area will be greatly reduced therefore</p>	<p>guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

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				the growth rates cannot be used to predict the requirements for housing growth required in the WFDC area.	
	<a href="#">LPPO4833</a>	6.6 - Housing Need	Object	The estimates for population growth and hence residences required in the Wyre Forest over the next 18 years has been grossly exaggerated. The Office for National Statistics Sub National Population Projections (SNPP) 2014 Report estimated a population growth of 4.7% and therefore a need for 199 dwellings per annum. In actual fact the population of the Wyre Forest has only grown by a net figure of 1000 or 2.7% over the past 15 years. The core plan provided in the Amion Report would provide 3640 dwellings, which is an average of 202 per annum, which would accommodate an increase of 3% population – a far more realistic projection. Indeed since industry and thus employment within Kidderminster is currently in decline, even these figures appear to be over ambitious.	Objection noted.  The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.  Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	<a href="#">LPPO4678</a>	6.6 Housing Need	Object	I disagree with the Local Plan which states that the use of Green Belt is necessary to facilitate the building of 6000 houses in the next 15 year period as not enough Brownfield sites are available.  According to the statistics on page 39 of the Local Plan Review, there is a total of 967 dwellings completed or with planning permission granted on Brownfield sites, with a further 1193 proposed by the plan	It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing

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				<p>on other Brownfield sites. 350 dwellings are also proposed on Greenfield sites not in the Green Belt and 796 dwellings can be placed on previously built Green Belt land including 600 of these at Lea Castle. This makes a total of 3306 dwellings.</p> <p>Even using your confusing calculation of 300 homes required per year, this would mean at least 11 years would pass without any Green Belt needing to be removed. As you only need to show a 5 year land supply to avoid unwanted development challenges, the Green Belt review at this time is unfounded and unneeded.</p>	<p>requirements. This will include some greenfield sites within the Green Belt.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>
	<a href="#">LPPO3226</a>	6.7	Object	For the reasons sighted in paragraph 6.3, Table 6.0.1 is not supported by the OAHN document what has different figures and the OAHN dismisses three independent analyses as being inconvenient to its engineered numbers to support a political council Ambition that simply is not required. At 6.13 it is stated that the previous housing strategy was 200 houses per year yet at 6.14 concludes no need to adjust the dwelling provision. This is completely unacceptable and is absurd.	Objection noted.
Sir Thomas White's Charity	<a href="#">LPPO912</a>	Para 6.7	Support	In relation to housing development, the Preferred Options document seeks to provide for 5,400 dwellings (300 units per annum) over the plan period. This	Support is noted.

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				represents a notable increase from the 200 dwellings per annum requirement in the currently adopted Local Plan. This increase is welcomed in order to ensure the Council are meeting their Objective Assessment of Housing Need. Our client also supports the approach of employing an annual requirement of 300 units, rather than a stepped trajectory, as this will ensure a steady supply is achieved throughout the plan period.	
	<a href="#">LPPO2591</a>	Paragraph 6.7	Object	The Plan makes reference to another document regarding the calculations for the number of dwellings required in the plan period. It would be better if the Plan itself showed these calculations in the interests of transparency.	Objection noted.
Gladman Developments Limited	<a href="#">LPPO1438</a>	para. 6.8	Comment	<p>The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. If a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.</p> <p>In this regard, Wyre Forest District Council must be able to demonstrate that it has engaged and worked with neighbouring and nearby authorities, alongside</p>	Comments noted. WFDC continue to have Duty to Cooperate discussions with its neighbouring local authorities, and will continue to consult on subsequent stages of the Local Plan review process.



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				<p>any existing joint working arrangements, to satisfactorily address cross boundary strategic issues and the requirement to meet any unmet housing needs.</p> <p>It is noted that the Local Plan Review Preferred Options Document includes a section on the ‘Duty to Cooperate’ at paragraph 6.8. Reference is made here to the conclusions of the Council’s OAHN Study, April 2017 on the definition of the housing market area and indicates that Wyre Forest District Council area is co-terminal with the Wyre Forest Housing Market Area and as such the housing requirement is based solely on the needs of the Wyre Forest. This conclusion is somewhat surprising given the location of the district in the context of the West Midlands region and that the CURDS Study indicates that Wyre Forest falls within the Worcester HMA alongside the local planning authorities of Worcester City, Malvern Hills, and Wychavon. Gladman are of the clear view that this will need to be explored further during the process of finalising the Local Plan and that this is a matter that must be carefully considered alongside the relevant authorities within the auspices of the Duty to Cooperate.</p> <p>At the publications stage, it will be essential that the process that the Council has followed to fulfil its duty to cooperate during the plan making process is fully</p>	

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				documented. This should provide background information on the issues that have been tackled and justification for any associated outcomes, including consideration of a robust way forward should agreement not have been achieved across all relevant issues.	
Barratt Homes West Midlands	<a href="#">LPPO764</a>	Para.6.8	Object	We consider that Wyre Forest WILL need to play an active role in helping to meet the growth needs of Birmingham and the Black Country. About 60,000 additional dwellings will need to be delivered in adjoining areas. This is likely to affect commute to work patterns and distribution of development. Until the distribution of this large shortfall is agreed it is premature for the Wyre Forest emerging plan to assume that it has no role to play.	Objection and comments noted. WFDC continue to have Duty to Cooperate discussions with its neighbouring local authorities, and will continue to consult on subsequent stages of the Local Plan review process.
South Staffordshire Council	<a href="#">LPPO1251</a>	6.8	Comment	As a member of the GBSLEP, Wyre Forest District Council (WFDC) participated in the initial PBA Strategic Housing Needs Study work. Stage 2 of the SHNS was published in November 2014 and confirmed that whilst WFDC did not comprise part of the Greater Birmingham and Black Country Housing Market Area (GBBCHMA), it had close links with it. Based on the earlier housing market areas, work undertaken for the National Housing and Planning Advisory Unit and published by DCLG in 2010, WFDC was a best fit with the Worcester HMA along with the three South Worcestershire Authorities (Worcester, Malvern Hills and Wychavon), but as these authorities have an	Comments noted. WFDC continue to have Duty to Cooperate discussions with its neighbouring local authorities, including South Staffordshire Council.

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				<p>adopted plan, it follows that for the purpose of this round of local plan making, WFDC is a free-standing HMA.</p> <p>The Issues and Options consultation noted support for additional in-migration, particularly of working age people, due to the ageing population in WFDC. The Amion / Edge Analytics 2017 Objective Assessment of Need Report, verifies the ageing population and also identifies internal migration as being the principal source of population growth. Figure 2.3 and table 2.2 in this Report show that the principal source of this is conurbation authorities within the GBBC MA.</p> <p>In considering economic factors, the Amion / Edge Analytics Report suggests an OAN of 300 dwellings per annum, compared to a demographically driven figure derived from the 2014 household projections of 199 dwellings per annum. The situation in the South Worcestershire Authorities mirrors that of WFDC in that they too are seeking economic led growth, which requires more people than demographic projections suggest and is reflected in the adopted plan. It follows therefore, that the same must apply in WFDC.</p> <p>The adopted Birmingham Development Plan acknowledges a shortfall of 37,900 dwellings in the GBBC HMA arising from the city alone and evidence emerging from the Black Country Core Strategy may lead to the overall HMA shortfall increasing further. It is logical to conclude that increased supply in WFDC is</p>	

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				likely to be met by additional migration from the GBBCHMA; this is reflected in 8.12 of the Amion / Edge Analytics Report. The recently published proposed modifications into the Telford and Wrekin Local Plan are relevant in this context in that the Inspector has acknowledged interactions between HMAs. As a consequence, we (together with our partner authorities within the GBBCHMA) would welcome the opportunity to discuss this matter with you further, with a view to signing a Duty to Cooperate Statement / Memorandum of Understanding between the relevant local authorities.	
CORE11	<a href="#">LPPO202</a>	6-8	Comment	The last line at 6-8 refers to the Core Strategy as one of the legal statutory instruments to be followed alongside the NPPF.	Comments noted.
	<a href="#">LPPO479</a>	paragraph 6.8	Support	Pleased that Wyre Forest District only has to plan developments in line with Wyre Forest District needs, however, as commented before I do not believe that we need 300 new properties p.a.	Support is noted.
South Worcestershire Authorities	<a href="#">LPPO1243</a>	Duty to cooperate	Comment	Whilst paragraph 6.8 refers to the Duty to Cooperate, it is not clear what agreement, if any, has been reached with regard to the role of Wyre Forest District in providing homes to meet need arising outside of its own Housing Market Area and any implications that this may have for the Development Strategy.  The SWCs welcome the opportunity for further	Comments noted. WFDC continue to have Duty to Cooperate discussions with its neighbouring local authorities, and will continue to consult on subsequent stages of the Local Plan review process.

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				discussions with Wyre Forest District Council as the Local Plan Review progresses in order to comply with on-going requirements associated with the Duty to Cooperate. Consequently the SWCs wish to continue to be consulted on subsequent stages of the Wyre Forest Local Plan review.	
	<a href="#">LPPO3748</a>	6.8	Object	The Wyre Forest District is incorrectly quoted as being within the West Midlands – it is within Worcestershire! Clearly the Executive should revise his geography! I have no confidence of the flawed report nor its conclusions. For the reasons sighted within 6.3, the Plan does not correctly forecast the housing requirements and this will lead to needless consumption of valuable green belt. There is clear evidence that the council has engineered its documents to deliver a policy that is unsupported. There is evidence that Wyre Forest is presently a stable housing market area and stakeholders consulted say that there is no sizeable demand for new housing. The Council is misguided in its judgement to try and grow artificially a town that does not want or need to become a competitor to West Midlands or surrounding areas. If the area is presently stable that there is no need to damage this with negative impact upon infrastructure, health facilities, transport etc that a grossly enlarged town would create. The Wyre Forest towns are presently sweet balanced areas to live without becoming ever larger and changing their	Wyre Forest District forms part of the West Midlands Region, as does Worcestershire.

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				character. I therefore object to the statements made as the information is false.	
	<a href="#">LPPO3750</a>	Paragraph 6.9	Object	<p>I object to the Council’s plans for use of land in general; development has been inefficient in terms of land consumption.</p> <p>The Council is misguided in its quest to continue to grow– this will change the character of the areas and imbalance the supporting infrastructure.</p> <p>Inner town development with better more efficient design for affordable housing/presence in town centres would be more efficient use of land.</p>	Objection and comments noted.
West Midlands HARP Planning Consortium	<a href="#">LPPO1333</a>	Para 6.9 - Land supply	Comment	<p>Criterion a. should be amended to include Housing Association Registered Providers. The revised criterion should read as follows:</p> <p><i>a. 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.</i></p> <p>It is noted that there is no specific mechanism whereby if the housing supply falls by 10% below expectation in any monitoring period and how the Council would respond to the shortfall. A solution could be that the council could bring forward reserve sites, this would</p>	Comments noted.

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				give more accountability.	
	<a href="#">LPPO3673</a>	6.9	Object	6.9 It appears the council have already been in negotiations with Persimmon homes. This is evident by the actions of Persimmon homes in laying claim to the planning permission for the land before any consultations have been concluded with the public.	Objection noted.
Wyre Forest Community Housing	<a href="#">LPPO1645</a>	Para 6.9	Comment	In respect of the Management of Land Supply we support work by the District Council to ensure that it is in a position to respond quickly to changing circumstances and we note and support the initiatives suggested.	Comment noted.
Gladman Developments Limited	<a href="#">LPPO1341</a>	para. 6.9	Comment	Gladman wish to stress importance of pro-active monitoring of housing needs and supply over plan period. Request that a policy is included in Local Plan to clearly set out the positive planning measures that will be adopted to ensure a five year supply of deliverable housing sites is sustained.	Comments noted. WFDC already provides housing monitoring information and will continue to do so. Disagree that a policy should be included in the Plan on five year housing supply as LAs are already required to maintain a 5YHLS in the NPPF; it would therefore be a repeat of national planning policy.
	<a href="#">LPPO294</a>	6B	Support	Support for Policy 6B.	Support noted.
Wyre Forest Green Party	<a href="#">LPPO1485</a>	Sustainability Appraisal	Comment	In the presentation of the two preferred options (in Appendix E of the Sustainability Appraisal), Option A appears to have more plusses and less minuses than Option B. However: <ul style="list-style-type: none"> <li>The so-called Eastern Relief Road is not</li> </ul>	Comments noted.

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				<p>necessarily a benefit as has been already explained;</p> <ul style="list-style-type: none"> <li>• There is no evidence that a road, for which there is no detail, will “help reduce traffic congestion in the town centre”.</li> <li>• Option A claims to have a significant improvement “on traffic issues and the Air Quality Monitoring Area around the Horsefair in Kidderminster.” Any traffic amelioration measures which take place at the Horsefair can be done in conjunction with a redevelopment of the sites at Churchfields and are completely independent of housing development and roads at Spennells.</li> <li>• There is a claim that Option A will “enable more effective school provision” by concentrating over 1000 homes in one area – however, there is no guarantee any school will be built.</li> <li>• Concentrated development to the East of Kidderminster is said “to provide additional services and facilities such as infrastructure, shop, school, cycleways and footpaths.” This could equally be said for a concentrated development in any area.</li> </ul>	
Gladman Developmen	<a href="#">LPP01573</a>	6.11 Sustain	Comment	In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local	The Sustainability Appraisal is a document that runs in parallel with our emerging Local Plan.



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ts Limited		ability appraisal		<p>Plans must be subject to Sustainability Appraisal (SA).</p> <p>The Council should ensure that the results of the SA process clearly justify the policy choices made within the Local Plan. It should be clear why some policy options have been progressed and others have been rejected. The Local Plan's approach to scoring and the associated decisions made, should be robust, transparent and justified. The sustainability merits of all of the reasonable alternatives should be fully explored and tested in the context of their ability to achieve a sustainable form of development that accord with national policy and fully support the economic, social and environmental objectives of the area. Care must be taken to ensure that each reasonable alternative has been considered to the same level of detail as the option that is eventually chosen within the Local Plan.</p>	<p>Work on the SA is continuing as we progress further with our plan. Reasonable alternatives have been considered in the SA and will continue to be considered as we progress with the work. The SA will be published during the Pre-Submission consultation.</p>
Persimmon Homes Limited	<a href="#">LPPO1594</a>	Paragraph 6.11	Comment	<p>There are further areas of the Sustainability Appraisal which need to be amended to reflect the potential benefits of development identified in the accompanying Illustrative Masterplan (<b>Appendix 1</b>). A summary of the changes, and justifications, has been proved as part of <b>Appendix 2</b> which indicates a significant improvement of the sites scores in areas around accessibility, sustainable transport, landscape and townscape, biodiversity and the historic environment setting.</p>	<p>Comments noted. The SA will be reviewed and updated for the pre-submission plan.</p>

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Persimmon Homes Limited	<a href="#">LPPO1601</a>	Paragraph 6.11	Comment	<p>The site scores well on its own merit and when compared to other sites in Bewdley, such as Alton Nurseries, Tower Farm Long Bank, land at Dry Mill Lane and Lax Lane they all contain at least one significant negative score in the Sustainability Appraisal whereas Catchem’s End does not. The site is shown to bring strong benefit in terms of housing numbers and with regards to promoting an active lifestyle and health and wellbeing; a range of appropriate housing; the protection of water facilities and against flooding and promoting energy efficiency whilst also maintain and enhancing community identities. As shown in <b>Appendix 2</b> the scoring that Catchem’s End received in the Sustainability Appraisal was flawed. The amended scoring shows that Catchem’s was significantly more sustainable than other sites within the area and can provide significant benefits to the settlement.</p> <p>Site can provide quality open space, which is not possible on other sites, this would also help maintain and improve biodiversity and geodiversity whilst also conserving the local historic environment; two points that the site was marked poorly on in the Sustainability Appraisal. The open space would also provide further safe pedestrian and cycle routes for the residents living on the site and from the wider settlement.</p>	Comments noted. The SA will be reviewed and updated for the pre-submission plan.
	<a href="#">LPPO4735</a>	6.11	Comment	It is not very clear from this document what allowance has been made in these plans to what is happening	Comments noted. Information about neighbouring Local Authority areas can be

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				<p>elsewhere in areas around the Wyre Forest and what effect the inclusion in the West Midlands LEP as well as the Worcestershire LEP except to include reference to co-operation (Paragraph 6.8 , Page 26)</p> <p>This development strategy says (para 6.11) that it is linked to the 'Wyre Forest Vision' (Para 3.1) but I don't see much evidence of this in the subsequent pages. There is little reference to this vision just many references to government requirements. On a local level I would wish to see the former take preference over the latter.</p>	obtained from their Council websites. Information about the LEPs can also be obtained from the LEP websites.
	<a href="#">LPPO3541</a>	Paragraph 6.11	Object	Heavy weight would be put on the supply of resources such as schools, utility supplies, highways etc. Surely the housing that have been constructed on the sugar beet site far outweighs the percentage of new build required by the government. When the proposal goes ahead, notice I don't say if, the sprawl will continue until Wyre Forest is joined into the built up surrounding areas with no green space left.	Objection noted.
	<a href="#">LPPO3751</a>	Paragraph 6.11	Object	I object to the Council's development strategy which is unsustainable and will alter the character of the towns driven by false OAHN conclusions and damage the economic, environmental and social characteristics of the area.	Objection noted.

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	<a href="#">LPPO118</a>	Sustainability Appraisal Para 5.35	Comment	Your 'Preferred options sustainability appraisal report' talks at point 5.35 of the Highclere site (and other sites) ....'With mitigation of highway improvements may have the potential for a neutral effect' (of increased traffic). The use of the word 'may' is highly significant. It is impossible to consider what highway improvements could be carried out to Wyre Hill or Park Lane to mitigate the problems and potential pedestrian casualties caused by increase traffic, due to the constricted nature of both roads.	Comments noted.
Worcestershire Wildlife Trust	<a href="#">LPPO1113</a>	Paragraph 6.11 SA	Comment	We are particularly concerned to see that the Sustainability Appraisal (SA) for the Plan concentrates simply on designated sites (Sites of Special Scientific Interest and Local Wildlife Sites) under SA Objective 9 rather than encompassing wider biodiversity as we recommended during the scoping process. At the very least we consider that the council should be taking into account habitats and species of principle importance as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The legal duty imposed on the council in this regard is set out in Section 40 of the Act and we strongly recommend that the evidence base is re-visited to take account of this. We believe that the failure to consider habitats and species outside designated sites represents a fundamental shortcoming in the SA and may undermine the decisions taken so far. This is underlined by the overall SA finding that ' <i>it would be</i>	Comments noted. We will look to updating our evidence base and also our SA to take on board these issues raised.

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				<i>expected that both options would have a significant positive effect on the district's biodiversity', which we consider to be highly unlikely at the moment. Further work to determine the impact of proposed allocations will be required to ensure that the Local Plan is based on sound evidence and can be progressed in line with the law and relevant planning guidance (see for example NPPF paras. 9,17, 109,110, 117, 157 and 165). We would be pleased to discuss this fundamental issue with the council with a view to improving the evidence base for the Local Plan if that would be helpful.</i>	
Worcestershire Wildlife Trust	<a href="#">LPPO1120</a>	Paragraph 6.11 SA	Object	<p>The assumptions in the SA (suggesting positive biodiversity outcomes) seem extremely optimistic. Whilst mitigation for some of the biodiversity issues may well be possible it will require land take that is likely to have implications for the net developable area (and accordingly the number of dwellings allocated) set out in the plan.</p> <p>We do not consider that these biodiversity constraints have been considered properly in the evidence base for the plan and we do not accept the findings of the SA.</p>	Objections and comments noted. We will look to undertake ecological appraisals of some of the sites in the next stage of plan making to inform the pre-submission plan.
Worcestershire Wildlife Trust	<a href="#">LPPO1121</a>	Paragraph 6.11 SA	Object	Need to update the evidence base for the plan prior to	Objection noted. We will update our evidence

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re Wildlife Trust		ph 6.11 SA		<p>finalising the allocations.</p> <p>We reiterate the need to determine any ecological constraints that may exist using up to date survey information. We cannot see that this has been done and so far as we can ascertain constraints other than SSSIs and LWSs have not been considered in the evidence base or SA for these sites. This may have the effect of rendering their allocation unsound. We therefore strongly recommend that the evidence base for sites listed in Table 32.0.1 and 32.0.2 is updated and that the quantum of development proposed is made acceptable in light of any overriding biodiversity constraints before the plan is finalised.</p>	base accordingly.
Worcestershire Wildlife Trust	<a href="#">LPPO1122</a>	Paragraph 6.11 SA	Object	<p>We reiterate the need to determine any ecological constraints that may exist on any of the sites using up to date survey information. We cannot see that this has been done and so far as we can ascertain constraints other than SSSIs and LWSs have not been fully considered in the evidence base or SA for the plan. This may have the effect of rendering the plan unsound. We therefore strongly recommend that the evidence base for sites listed in Table 33.0.1 and 33.0.2 is updated and that the quantum of development proposed is made acceptable in light of any overriding biodiversity constraints before the plan is finalised.</p>	Objection and comments noted.
Worcestershire Wildlife	<a href="#">LPPO1125</a>	Paragraph 6.11	Object	<p>Proposed allocation BR/RO/4/6 – Although we note the comments set out in paragraph 35.2 of the</p>	Objection and comments noted.

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Trust		SA		<p>reasoned justification we wish to object to the allocation of this site. We do not think it likely that the proposed development would be capable of maintaining the orchard (and any unimproved grassland present) to any meaningful degree given the level of housing proposed and we do not agree with the SA conclusion that the site would have a neutral effect on biodiversity (which we assume has been reached because the evaluation only considered designated sites). Traditional orchards are included under Section 41 of the NERC Act 2006 (and often contain S41 species including the noble chafer, which is known from nearby sites) and we cannot find any justification for the losses that would be likely set out in the evidence base for the Plan. As a result we object to this allocation on current evidence and would strongly recommend that further work be done to determine the impacts prior to any final allocation being accepted. It is important to note that any significant reduction in developable area arising from biodiversity constraints may render the site unviable.</p> <p>Proposed allocation BR/RO/7 – This site is also partly traditional orchard and whilst some level of development may be possible the issues set out above still pertain and again we wish to object to its allocation until further evidence is available to demonstrate that development here is sustainable.</p>	

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				<p>The majority of other sites proposed under this policy also have likely biodiversity implications and so we reiterate the need to determine any ecological constraints that may exist on any of the sites listed under this policy using up to date survey information. We cannot see that this has been done and so far as we can ascertain constraints other than SSSIs and LWSs have not been fully considered in the evidence base or SA for the plan. This may have the effect of rendering the plan unsound. We therefore strongly recommend that the evidence base for sites listed in the two allocations tables is updated and that the quantum of development proposed is made acceptable in light of any overriding biodiversity constraints before the plan is finalised.</p>	
Natural England	<a href="#">LPPO1128</a>	Sustainability Appraisal	Comment	<p>Natural England is pleased to have been consulted at this stage in the SA process and welcome the general approach taken by the Sustainability Appraisal. We acknowledge that the SA has considered reasonable alternatives by considering a range of potential sites for development and that all of the sites have been assessed against the SA objectives.</p> <p>We note at 2.16 that the next stage of the local plan will consider 'proposed site allocations' i.e. pre-submission (Scheduled for Spring 2018) and further that;</p> <p>4.2 ".....Alternatives considered at the early stages of plan-making need not be elaborated in too much detail</p>	Comments noted. Agree to further engagement with Natural England.



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				<p>so that the “big issues” are kept clear; only the main differences between alternatives need to be documented i.e. the assessment should be proportionate to the level and scope of decision-making for the plan preparation”.</p> <p>4.4 – “As a plan evolves, there may be further consideration of options that have developed by taking the preferred elements from earlier options. Thus the options for plan-making change and develop as responses from consultation are considered and further studies are undertaken.”</p> <p>4.5 – “There is a hierarchy of options assessment with sites that are not viable or deliverable or might have adverse effects on protected environmental assets rejected at an early stage.”</p> <p>Nonetheless our concerns regarding sites consulted on in 2016 and affecting nationally designated sites around the town remain unaddressed. Our consultation responses dated 9.9.16 and 2.12.16 refer. Natural England repeats its requests for a meeting (previously expressed by email in December 2016 and April 2017) with the LPA to discuss the approach to be taken with regard to these sites.</p> <p>We draw the Council’s attention to the fundamental nature of these concerns and the need to ensure as far as possible that the plan can be judged ‘sound’ at the next stage of local plan making.</p>	
Natural	<a href="#">LPPO1129</a>	Sustain	Comment	The comments set out below relate to the matrices	Comments noted. The SA will be updated

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England		ability Appraisal - Sites		<p>within Appendix G and follow up on our previous response on the SA:</p> <p><b>FPH/1, Settling ponds, Wilden Lane</b> – the SA matrices for this allocation highlights that proposals could result in impacts on landscape and biodiversity but it is not explained in the accompanying text. We would have concerns that development in this location could potentially impact on the Wilden Marsh &amp; Meadows SSSI.</p> <p><b>BW/4, Hurcott ADR</b> – we note that the matrices have identified that this site is adjacent to the SSSI and a residual negative impact on landscape and biodiversity may result unless mitigation is in place. We acknowledge that the local plan policy explains that extensive areas will be left undeveloped to protect the adjacent Hurcott Meadows SSSI.</p> <p><b>WFR/WC/15, Lea Castle</b> - we acknowledge that the SA identifies that this site includes large tracts of woodland and acid grassland that needs to be protected and that fragmentation of ecological corridor should be avoided.</p> <p><b>BR/RO/7, New Road Far Forest and BR/BE/6, Land off Highclere</b> – priority habitats should be considered within these allocations.</p>	accordingly.

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				<p><b>AS/5, Victoria Carpets, Sports Ground</b> – Whilst flooding issues are mentioned in the SA for this site the possible impact on the Wilden Marsh &amp; Meadows SSSI via the Hoo Brook has not been included.</p> <p><b>OC/13 East of Kidderminster</b> – Whilst we support enhancements to the watercourse and pools for this area we would expect the SA to mention the potential impact on Wilden Marsh &amp; Meadows SSSI.</p> <p><b>MI/3, Parsons Chain</b> – The potential impact on the Hartlebury Common and Hillditch Coppice SSSI should be mentioned.</p> <p><b>FPH/10, British Sugar Phase 2</b> – the potential impact on Wilden Marsh &amp; Meadows does not appear to have been fully considered.</p> <p><b>BW1, Churchfields &amp; BW2 Lime Kiln Bridge</b> – the impact on deciduous woodland, the River Stour and Wilden Marsh &amp; Meadows should be considered.</p>	
Worcestershire Wildlife Trust	<a href="#">LPPO1114</a>	Paragraph 6.11 SA	Object	Of particular note is the need to determine any ecological constraints using up to date survey information. We cannot see that this has been done and so far as we can ascertain constraints other than SSSIs and LWSs have not been considered in the evidence base or SA for the plan. This may have the effect of rendering the plan unsound. We therefore	Objections and comments noted.

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				<p>strongly recommend that the evidence base for sites listed in Table 30.0.1 is updated and that the quantum of development proposed is made acceptable in light of any overriding biodiversity constraints before the plan is finalised.</p> <p>Notwithstanding the broad comments above we wish to object specifically to the allocation of site FPH1 (Settling Ponds, Wilden Lane) because we consider that development here will lead to unacceptable adverse impacts on the adjacent SSSI and our Wilden Marsh Nature Reserve. This is a particularly significant issue because the site has been included as a Core Site in the Local Plan with Option A proposing employment and Option B proposing housing. Both options are likely to have impacts that we do not believe can be effectively mitigated because of the limited space available and the very close proximity of development to the SSSI and reserve. In light of this we are extremely surprised to note that the Sustainability Appraisal scored Option A as a minor negative and Option B as neutral in terms of the impact on the designated site and we seriously question the underlying assumptions made to reach this conclusion, especially given the commentary in the consultation document regarding the need for further hydrological study.</p>	
	<a href="#">LPPO2031</a>	Policy	Object	There are no facilities for extra housing. There are not	Objection noted.

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		31		enough schools or doctors surgeries. We will lose more of our green area which will do the ozone no good what so ever.	
	<a href="#">LPP01596</a>	Sustainability Appraisal	Comment	<p>The Local Plan Preferred Options attempts to qualify the loss of Green Belt land via use of its Sustainability Appraisal Methods. The following 4 objectives have clearly been ignored, as have the decision-aiding criteria with the Preferred Options to the Local Plan.</p> <p>(tables included in full response)</p> <p>The local authority has also ignored numerous environmental aspects. The noise, visual intrusion and pollution the by-pass would cause to people both living and working in the areas affected is huge.</p> <p>There are various breeds of bat to Hodge Hill Farm Barns (common pipistrelle, noctule and brown long-eared) when these were converted from farm buildings to dwellings (see planning permission) the ecological survey by Worcestershire Wildlife Consultancy demanded the provision of both bat roosts and bat boxes. The survey also states that there are further breeds of bat within a 2km radius of Hodge Hill Farm and that Hurcott Podmore pools and Hurcott woods and the primary source of food for bats. WFDC have a legal requirement under the Wildlife and Countryside Act 1981 and Conservation of Habitats and Species</p>	<p>Comments noted. The SA will be reviewed and updated for the pre-submission plan.</p> <p>A Green Belt Study was undertaken to inform the Preferred Options document and has since been updated to consider new sites. This GB study considers the five purposes of Green Belt, as set out in the NPPF.</p>

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				<p>Regulations 2010 to protect the bats in and around Hodgehill and Hurcott. The effects of the proposals to develop on <b>OC/4, OC/5, WFR/CB/7</b> and the building of a bypass would undoubtedly be detrimental to the bats at Hodge Hill. The Bat Conservation Trust state: <i>If a bat survey demonstrates that bats and/or a known roost are likely to be affected by the proposed development and planning permission is to be granted: condition should be placed on the decision notice requiring the developer to apply for and obtain, a European Protected Species Licence before work commences.</i></p> <p>Hurcott and Podmore pools and Hurcott Woods is an area of Significant Scientific Interest (SSI). We have contacted the Wildlife Trust to make them aware of the proposals to not only the pools, but surrounding wet woodlands within Hurcott. They advise that noise, visual intrusion and pollution of developments in and around Hurcott village would have a negative environmental impact.</p> <p>We would ask Wyre Forest District Council to literally go back to the drawing board and re-consider their own Sustainability Appraisal Objectives and their Decision-Aiding Criteria, and then correctly apply these to any proposals to modify the Local Plan.</p> <p>It would appear to be obvious that the Preferred</p>	

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				Option of squeezing virtually everything into one concentrated area is not compatible with sustainability.	
Spennells Against Further Expansion	<a href="#">LPP01745</a>	Sustain ability Apprais al	Object	<p>In the presentation of the two preferred options (in Appendix E of the Sustainability Appraisal), Option A appears to have more plusses and less minuses than Option B. This is false for the following reasons:</p> <ul style="list-style-type: none"> <li>• The so-called Eastern Relief Road is not necessarily a benefit and the argument for it is demolished in another section of our letter.</li> <li>• There is no evidence that a road, for which there is no detail, will “help reduce traffic congestion in the town centre”.</li> <li>• Option A is claimed to have a significant improvement “on traffic issues and the Air Quality Monitoring Area around the Horsefair in Kidderminster.” Any traffic amelioration measures which take place at the Horsefair can be done in conjunction with a redevelopment of the sites at Churchfields and are completely independent of housing development and roads at Spennells.</li> <li>• There is a claim that Option A will “enable more effective school provision” by concentrating over 1000 homes in one area – however, there is no guarantee any school will be built.</li> </ul>	Objection noted.

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				<ul style="list-style-type: none"> <li>Concentrated development to the East of Kidderminster is said “to provide additional services and facilities such as infrastructure, shop, school, cycle ways and footpaths.” This could equally be said for a concentrated development in any area.</li> </ul>	
	<a href="#">LPPO1751</a>	Paragraph 6.12	Object	<p>Have there been appropriate and detailed studies carried out by suitably qualified and experienced experts to demonstrate this beyond doubt in the Wyre Forest / Kidderminster area?</p> <p>The documentation available does not show this to a degree that would enable the statements made in the Plan that there is insufficient Brownfield Land available in the area to prevent the amount of excessive development proposed on Green field areas (such as the Spennells extension).</p>	Objection noted. A viability assessment study has been undertaken which helps to inform the emerging Local Plan in terms of evidence base.
CORE11	<a href="#">LPPO203</a>	6-12	Support	Support for paragraph 6.12.	Support noted.
	<a href="#">LPPO3752</a>	Paragraph 6.12	Object	I object to the Council’s misguided belief. Using its own contracted analysis, that there is a higher housing requirement. The evidence for which is in the OAHN document.	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p>



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					<p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<p><a href="#">LPPO3674</a></p>	<p>Paragraph 6.12</p>	<p>Object</p>	<p>6.12 I would question whether all of the Brownfield sites have been developed. Where is the evidence for this? There appears to be many vacant homes in current developments. Why are these still empty?</p> <p>I would question your reference to Greenfield site – It appears to be a convenient way for Councils and developers to destroy Green Belt land and circumvent Green Belt protections.</p> <p>Please supply written evidence of what constitutes Greenfield sites and why the wildlife, trees and landscape in that area is less significant and does not warrant the same protections than in Green Belt .</p> <p>I would also question the housing requirement as outlined above.</p>	<p>Objection noted. Greenfield sites are defined as not previously developed. The Housing &amp; Economic Land Availability Study (HELAA) provides the evidence to the sites that have been assessed through the Local Plan Review process.</p>
	<p><a href="#">LPPO3043</a></p>	<p>6.12</p>	<p>Comment</p>	<p>No Green Belt land should be released until all of the considerable Brownfield land in the Wyre Forest area has been used up. Makes reference to Council previously acknowledging that around 3000 dwellings</p>	<p>Comments noted.</p>

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				could be constructed upon existing Brownfield sites in Wyre Forest.	
	<a href="#">LPPO4403</a>	6.12 Brownfield land	Comment	WFDC should ensure all Brownfield sites are developed first. Otherwise they will never be developed. House Builders only want to build on Green Belt sites as they are more profitable. I notice that Persimmon Homes are appealing to the Government for the release of more Green Belt land. The extra cost of building on a Brownfield site reduces their profit margin.	Comments noted.
	<a href="#">LPPO4650</a>	6.12	Comment	Your plan refers to insufficient sustainable located readily available Brownfield or non-Green Belt land to accommodate the necessary housing and employment growth required in the plan period. We realise that the council offices have now left Kidderminster and been built in the new development towards Stourport but surely all of the WFDC can see that Kidderminster is fast become a ghost town and, rather than moving housing and commercial areas away from the town centre and forever eroding the value of Kidderminster as a town, regeneration within the centre to include housing and refreshed commercial sites should be a priority. There are large pockets of empty, run-down and vandalised industrial sites, as well as areas of land that have been cleared (such as the old leisure centre and ex-retail sites in the town – even the shelved development of the old post office could have provided a large source of town-living apartments) which could so easily have served to provide new units	Comments noted.

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				<p>for commercial premises or town-centre living – the latter actually bringing people into the town and therefore increasing the need for commercial services to provide to residents.</p> <p>From the land reviewed, it appears that there is the potential for 490 + 29 + 779 dwellings under individually reviewed Brownfield sites in urban and rural locations (although Brown Westhead Park in Wolverley and the site of the old quarry on the B4189 seem to have been omitted from these considerations) with more site likely to come forward for consideration. The Campaign to Protect Rural England has provided research to show that housing developments on Brownfield sites are consistently completed more quickly than construction on Greenfield land and, as such, we would ask that you reconsider your useage of the Green Belt for construction. Give Kidderminster and it’s residents a chance to rejuvenate the town centre, use and upgrade its existing infrastructure (rather than destroying more countryside to put a relief road that is not necessary) remove the eye-sores and problem sites that give current residents a headache and allow everyone to enjoy its surrounding green spaces that were given Green Belt status to protect such areas in the first place.</p> <p>We do not need to become another urban sprawl to</p>	

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				meet the needs of the area. Use Brownfield sites in the Green Belt by all means (such as the Lea Castle Site) but stick to existing footprints rather than destroying our precious assets that, once lost, will never be regained.	
	<a href="#">LPPO5073</a>	6.12	Comment	Not enough information about the plans for land that apparently is readily available for development – Lea Castle, ideas for developing the Glades site seem to be at odds with priorities. Proposals for the development of Green Street should be taken into consideration that is as far as Kidderminster is concerned, there must be similar areas or plots of land in the other two towns.	Comments noted.
	<a href="#">LPPO4810</a>	Brownfield Land	Comment	I have little confidence that Brownfield sites are fully identified by WFDC. There should be a public document showing where the Brownfield sites are so omissions could be identified by the public. There should also be a commitment from WFDC that all Brownfield sites are used for housing before Greenfield sites. The use of Greenfield sites should then be phased and reviewed taking population growth into account, as the projections could well be excessive.	Comments noted. A Brownfield Land Register was published on the Council’s website in December 2017. The register will be updated annually.
	<a href="#">LPPO4812</a>	6.12 Brownfield use	Object	Statements have been made that there are not enough Brownfield sites to meet the need, yet there is no comprehensive list of such sites? Statements have been made that Brownfield sites will be built on first, I	Objection noted. A Brownfield Land Register was published on the Council’s website in December 2017. The register will be updated

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				believe this would be firstly illegal and secondly unenforceable. Why have these statements been made?	annually.  The Council has considered Brownfield sites as part of the Local Plan process. As much of the District is Green Belt, the Council has looked to accommodate its development need on suitable and deliverable Brownfield sites first before considering Greenfield / Green Belt sites.
	<a href="#">LPPO4824</a>	6.12 - brownfield use	Object	Development of all the Brownfield sites should take place before using any other land. There are more which should and could be considered. There is a large disused property behind Matalan (Park Lane), there is an old building, (inhabited by pigeons) opposite Aldi on Green Street and there are many empty town centre shops. The old Woolworths for example could be turned into an indoor market with small shop units on the ground floor and create flats above.	Objection and comments noted.
	<a href="#">LPPO4843</a>	6.12 - brownfield use	Comment	Use Brownfield sites to meet housing need before greenbelt.	Comments noted.
	<a href="#">LPPO4631</a>	6.12 Brownfield Land Use	Support	I believe that Brownfield sites should be developed where possible over Green Belt areas. The old Chichester Caravans site at the junction of the A451 and the Gilgal does not seem to figure in the plans; I pass this every day of the week but perhaps there are others that I am unaware of.	Support and comments noted.

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	<a href="#">LPPO2108</a>	Locating new development	Object	I have read and re-read the plan and tried to understand why anyone would build on green fields when we have so many empty buildings and sites that have previously been built on. I really hope that an alternative solution can be found to using Green Belt land because once it is gone, there is no going back.	Objection noted.
	<a href="#">LPPO2939</a>	6.12 - brownfield use	Comment	Development over the next 15 year period should be restricted to Brownfield sites, as far as reasonably practicable. Brownfield sites should be used first before any development starts on Greenfield sites.	Comments noted.
	<a href="#">LPPO2100</a>	Locating new development	Comment	There is a need for more housing but they need to be developed on the existing Brownfield sites and empty properties lying derelict on the town centre's Worcester Street. These properties have been empty for far too long and development on these sites are long overdue. Priority must be considered on redeveloping the town centre and existing Brownfield sites without our precious Green Belt being put under threat.	Comments noted.
	<a href="#">LPPO4490</a>	6.13 Green Belt Use	Object	<ul style="list-style-type: none"> <li>Proposals to build on Green Belt land when Brownfield sites (with conversion/demolition of existing buildings/empty accommodation for housing/apartments/OAP complexes in Kidderminster Town a priority). Green Belt land for housing should be the last option.</li> <li>I have no confidence in the statisticians' figures</li> </ul>	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release

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				<p>that we will need the stated number of houses by 2034 so NO building on Green Belt land unless there is a desperate need for housing in Kidderminster by 2034 and all other options have been exhausted.</p> <ul style="list-style-type: none"> <li>• Green Belt land should be left for the quality of our life and future generations, inc consideration for wildlife.</li> <li>• Consideration should be given to using Green Belt land for all to use for the health of our Nation</li> </ul> <p>What are the exceptional circumstances in Kidderminster/surrounding area for Wyre Forest District Council to build on the Green Belt?</p> <p>Why are we being asked to comment on such an important issue as building on Green Belt land when planners (Rowland Hill Centre Friday 21.7.17) cannot answer questions on infrastructure as no decision has been made on the Eastern bypass?</p> <p>Is this plan being rushed through and our comments disregarded as decisions have already been made?</p> <p>Building on Green Belt land is a National issue as well as a local one. Too many bad decisions have been made in the past and our MP and Councillors must listen to the local people they represent, the first</p>	<p>some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				consideration must be the quality of life now and for future generations, not lining the pockets of developers.	
	<a href="#">LPPO4871</a>	6.13	Object	<p>Development should concentrate on the undeveloped and derelict Brownfield areas of Kidderminster first to rejuvenate people to want to live there. If premises owners do not put forward empty buildings or vacant properties for redevelopment, this should be done as a compulsory purchase by the Council.</p> <p>The housing figures quoted are disproportionate and unjustified based on comments such as 'no population growth'. There is ample housing land currently available to take us into the next 10 years, and so at this point, no further land should be removed from the Green Belt.</p>	Objection and comments noted.
	<a href="#">LPPO5084</a>	6.13	Comment	<p>In 2014 CPRE identified Brownfield land within England on which to build 1,000 000 homes. The government's own office for national statistics shows only 537,080 homes have been completed. In October 53 authorities identified that 11% more housing could be built on brown field sites.</p> <p>The Green Belt, first introduced in 1935, but to England as a whole in 1955, was successful in putting in place a planning tool to prevent urban (and localized) sprawl. It is an effective method of ensuring towns and cities rejuvenate brown field sites to prevent slums. England</p>	Comments noted.



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				is only covered by 13% of Green Belt so to lose 2% is a huge disservice to future generations. The Green Belt provides countryside up close for 30 million people.	
	<a href="#">LPPO4658</a>	6.13 Green Belt use	Object	<p>Why did I respond to the plan? I would like to see the region prosper. I have lived on the Spennells for 30 years and use the footpaths on four or five occasions each week. I have been aware for many years of the possibility of removing the fields from Green Belt protection. However, on reading the plan, I strongly feel that the case has not been made to build on Green Belt.</p> <p><b>Final Comment</b> - I understand that the Council wrestles with conflicting needs on a tight budget, but the level of justification required before building, especially on Green Belt needs to be addressed urgently and much more rigorously.</p>	Objection noted.
	<a href="#">LPPO4682</a>	6.13 - Green Belt Use	Object	I would also like to include that no Green Belt should be removed at this time as per below (3,640 / 300 per annum) you have a healthy 12 year land supply available already (without any windfall sites arising) in existing Brownfield sites and you are only required to have a 5 year supply available which can easily be evidenced and which would stop any hostile building taking place. Therefore you need to leave the Green Belt restrictions in place until the end of this period as a minimum.	Objection noted.

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	<a href="#">LPO4895</a>	6.13	Comment	<ul style="list-style-type: none"> <li>I am struggling to see how any of the supporting reports have informed the choice of options in the Local Plan for the urban extension on the eastern side of Kidderminster. I do not believe there has been any clear reasoning and evidence to support the proposals in this Draft Plan.</li> <li>The Adopted Core Strategy of 2010 makes no mention of any of the proposed permits for development which appear in the current draft plan. Indeed, section 5.13 of that document states that ‘only proposals which can demonstrate very special circumstances will be permitted’ within the Green Belt. Having trawled through the documents that have been published since I cannot find any evidence of a significant change in the housing needs and demographics of the district, which would warrant overturning that policy.</li> <li>Green Belt land is there for a very good reason, and creeping urbanisation from the Birmingham conurbation is not permitted under current planning regulations except in ‘exceptional circumstances’. I cannot see that a case has been made here for exceptional circumstances.</li> </ul>	<p>The Sustainability Appraisal report, the Site Selection Topic Paper, and the HELAA assessment provide evidence on the site selection process. There are also other evidence base studies that have helped to inform the plan such as the Employment Land Review, Strategic Flood Risk Assessment and ecological appraisals. The evidence base studies used for the plan can be found on the Council's website.</p>

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				<ul style="list-style-type: none"> <li>The National Planning Policy Framework 2012 and the 2015 Conservative manifesto stated clearly that Ministers attach great importance to the Green Belt and will maintain existing levels of protection. In March this year the Prime Minister declared that protecting the Green Belt is 'paramount', and Communities Secretary Sajid Javid said 'In 2015 we promised the British people that the Green Belt was safe in our hands and that is still the case'. What are the justifications for Wyre Forest to overturn these clear statements of policy from the Government?</li> <li>Landowners have put forward in the call for sites most of the Green Belt land to the east of Kidderminster which is now under threat, as they can obviously see a huge windfall coming their way, and developers can see a greater return on developing these sites than the Brownfield sites still available in the area. It would seem to be the easy option to allow these proposals to go ahead, rather than pursuing other options.</li> </ul>	
	<a href="#">LPPO4588</a>	6.13	Comment	Quotes local Councillors stating that no Greenbelt should be lost if at all possible. These are most sensible opinions which if carried forward would ensure that any inadequacies in the PG figures or failures to meet	Comments noted.

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				<p>the employment targets would not see Greenbelt used unnecessarily and would minimise the need for any incursion into the greenbelt and thus prevent urban sprawl.</p>	
	<p><a href="#">LPPO4142</a></p>	<p>6.13 Use of Green Belt</p>	<p>Object</p>	<p>The review of the Wyre Forest Local Plan is proposing the redefinition of its Green Belt boundaries to accommodate its requirements for housing provision up until 2034. It is claiming that it is unable to meet its new housing target of 6000 houses between 2016 and 2034 without using current Green Belt land.</p> <p>Green Belt is our legacy, it is a precious inheritance that we should not abuse, indeed it is a vital part of our environment and something that we should nurture and pass on intact to further generation. It is every bit as important as providing new houses in this area for people that are not even here yet. Once Green Belt is lost its lost for ever, it is irreplaceable.</p> <p>The use of Green Belt for housing provision is against Government policy (<i>The 2017 Housing white paper</i>) states:</p> <ol style="list-style-type: none"> <li>1. Ensuring that plans start from an honest assessment of the need for new homes, and that local authorities work with their neighbours, so that difficult decisions are not ducked</li> </ol>	<p>Objection and comments noted.</p>

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				<p>2. Making more land available for homes in the right places, by maximising the contribution from brown and surplus public land, regenerating estates, releasing more small and medium-sized sites, allowing rural communities to grow and making it easier to build new settlements;</p> <p>iii. Helping households who are priced out of the market to afford a decent home that is right for them through our investment in the Affordable Homes Programme</p> <p>The business secretary Sajid Javid also promised ‘There would be no threat to the Green Belt’</p> <p>WFDC is totally going against the Housing White Paper and the Business Secretary in proposing the use of Green Belt to build houses that are not required. I am against the use of any Green Belt land for building on. Option A takes the whole of the 2.4% stated away from the community of Spennells and Summerfield. Is this fair?</p> <p>Brown sites must be prioritised and used first, as with empty and derelict buildings.</p>	
	<a href="#">LPPO3539</a>	Paragraph 6.13	Object	Once the green belt is gone it can never be put back which I am sure you are well aware of. Taking the	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local

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				green belt away will not only have an effect on the wildlife in the area, it will also have a profound effect on casual and weekend visitors, who seek to visit the area for some respite from the surrounding built up areas of the Black Country and Birmingham. This would diminish the 'businesses' of the leisure and catering industry especially in Stourport and Bewdley.	Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.
	<a href="#">LPPO3753</a>	Paragraph 6.13	Object	I object to the Council's strategy for development as it does not have the expertise to develop Brownfield land efficiently.	Objection and comments noted.
	<a href="#">LPPO3153</a>	Green Belt release	Object	I do not agree with the use of any Green Belt land for house building. The British countryside must be protected for our people and also for future generations. It seems that the proposed new housing is needed for an increasing population that cannot be controlled. Brexit appears to be the only way to achieve this.	Objection and comments noted.
	<a href="#">LPPO3208</a>	6.13	Object	I am writing to strongly object to any building over our lovely countryside, for the following reason...  The countryside is a beautiful natural haven for wildlife, flowers, hedgerows it is there to be enjoyed by all.	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not

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				<p>I do not accept that we need as many new houses as stated, this area has not had such a huge population explosion. So the new homes must be for out of town commuters.</p> <p>Our roads are already congested, they would become even more so with the amount of proposed new houses.</p> <p>It's very difficult for the existing doctors to cope with all their patients, waiting times for an appointment keep getting longer.</p> <p>The hospitals cannot cope at all with demand, patients in corridors, worst in the country for all manner of reasons.</p> <p>Our schools are full, very often parents cannot get their children into the local school of their choice.</p> <p>There are very few jobs in this area, so any new people will be commuting out of town for work.</p> <p>We need more affordable homes, so the young can make a start on the property ladder, smaller homes near the town centre, so the elderly may be encouraged to downsize to free up their larger family sized homes.</p>	<p>have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				You cannot seriously think that you can build all over our countryside without any consideration for the local people who live here and without any plans to build better roads, more Hospitals, doctors and schools.	
	<a href="#">LPPO2685</a>	6.13 Use of Green Belt	Object	<p>I understand that the Council are considering giving planning permission to build houses on Green Belt land for which many people are opposed to? Given that it is Green Belt I am somewhat surprised at this decision.</p> <p>We do not need more houses, because there is already a glut of them around the country? This will do nothing to 'build relationships between the general public and Governments/Councils.</p>	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.
	<a href="#">LPPO3754</a>	Paragraph 6.14	Object	I object to the Council's development strategy as Green belt being 'open countryside', the consumption of it makes farms less viable.	Objection and comments noted.
	<a href="#">LPPO3755</a>	Paragraph 6.15	Object	The statement is contradictory with its development strategy so I object to that strategy.	Objection noted.
CORE11	<a href="#">LPPO204</a>	6-15	Support	Support for paragraph 6.15.	Support is noted.
Historic England	<a href="#">LPPO1265</a>	6.15 Green Belt	Comment	We note the varied references to the Green Belt and the potential removal of land from the Green Belt for development. We further note the reference to the five purposes of the Green Belt on page 30 which we	<p>Comments on 6.15 Green Belt noted.</p> <p>A strategic review of the Green Belt has been undertaken prior this consultation, together</p>



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				welcome. Has the Council finished the Green Belt review? Was there any impact for the historic environment and if so, how is this being addressed?	with site analysis. Further site-specific analysis is underway which will inform the extent of the Green Belt proposed for the deposit draft.  Impacts for the historic environment identified in the review and site analysis will be assessed within the Heritage Evidence Base.
	<a href="#">LPPO452</a>	6.15 OC/4	Object	The Green Belt to the east of Kidderminster plays a vital part in separating the town from the West Midlands Conurbation.  Development of land behind Baldwin Road would be a serious visual incursion into the Green Belt and would impact on wildlife habitats on the buffer zones for the Hurcott and Podmore SSSI's.	Objection is noted.
CORE11	<a href="#">LPPO205</a>	6-16	Comment	In discussing green belt issues, it should be noted that where green belt secures any merging of towns or districts, it can however be acquired for recreational use, especially where a shortage of open space prevails.	Comment noted.
	<a href="#">LPPO470</a>	paragraph 6.16	Support	Support for para 6.16	Support noted.
	<a href="#">LPPO3756</a>	Paragraph 6.16	Object	There is no evidence of exceptional circumstances; the housing market is flat with no further demand. Independent analysis is dismissed by the OAHN document. The Council's documents show no	Objection noted.

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				consistent numbers of affordable housing need. I object to the process/development strategy.	
	<a href="#">LPPO3757</a>	Paragraph 6.17	Object	I object to the Council's policy of development as it has missed opportunities to build upwards.	Objection noted.
	<a href="#">LPPO3758</a>	Paragraph 6.18	Object	The Council is misguided in thinking that smaller towns need fewer facilities/infrastructure so these should not be protected from development in favour of overdevelopment of larger towns which increases transport needs. I object to the Council's strategy.	Objection noted.
	<a href="#">LPPO3759</a>	Paragraph 6.20	Object	I object to the Council's strategy for regeneration via more house building - it doesn't work.	Objection noted.
	<a href="#">LPPO3760</a>	Paragraph 6.21	Object	I object to the Council's strategy for development, tourism cannot be enhanced by building more houses the need for which is based on the OAHN which uses subjective assumptions.	Objection noted.
	<a href="#">LPPO3675</a>	6.21	Object	6.21 – There is no evidence for this. Where are the maps and information on which to make a judgment for the Eastern By pass? You have not advised how regeneration will occur. The transport, road and rail links are insufficient. Developing roads further will have the opposite effect on the region, serving to bypass Kidderminster completely on the way to Birmingham or Worcester.	Objection noted.
	<a href="#">LPPO3761</a>	Paragraph 6.22	Object	I object to the Council's strategy, it should encourage better land use via more efficient design.	Objection noted.

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	<a href="#">LPPO4506</a>	6.23	Comment	Stourport has recently developed excellent venues for food/live music and has a thriving evening/weekend economy so residents do not need to travel to Kidderminster which should no longer be regarded as the evening entertainment/social hub of the area.	Comments noted.
	<a href="#">LPPO3764</a>	Paragraph 6.24	Object	I object to the Council's strategy; there is not an infinite supply of green belt on which to build falsely derived housing analysis.	Objection noted.
Moor Park Trustees	<a href="#">LPPO1099</a>	6.24 - Urban extension	Support	The proposal, for an urban extension, maximizes two key basic principles a key one of which is a scale of new development which will allow effective provision of infrastructure and will thus capture sufficient contributions for supporting infrastructure.	Support noted.
	<a href="#">LPPO3765</a>	Paragraph 6.25	Object	I object to the Council's strategy, the OAHN document contains conflicting evidence and is dismissive of independent analysis reporting a false scale of development.  There is sufficient brown field land for modest development to enhance the area and attract investment.	Objection noted.
	<a href="#">LPPO3676</a>	6.25	Object	6.25 I do not believe you have justified the need to release Green Belt under the NPPF. Please see my comments under 1.18. You have not provided sufficient evidence under the areas highlighted.	Objection noted.
	<a href="#">LPPO506</a>	6.25	Object	Why do we need so many extra houses - I think the	Objection noted.

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				premise is wrong. We don't need to use the Green belt in the eastern side. Yes to Lea Castle as that has been talked about for many years.	
CORE11	<a href="#">LPPO206</a>	6-25	Comment	In line with the Core Strategy and NPPF any review of green belt should consider whether the district, has the full amount of statutory open and recreational space requirements already in place. Development in these areas would only make the shortages worse.	Comments noted.
	<a href="#">LPPO3766</a>	Paragraph 6.26	Object	I object to the Council's strategy; the overall District housing requirements have been falsely derived.	Objection noted.
	<a href="#">LPPO2311</a>	Paragraph 6.26	Object	6.26 - figures incorrect as based on rounding up, miscalculations and general poor calculations. Given this has not been done properly it makes the rest of the plan a nonsense!	Objection noted.
	<a href="#">LPPO4718</a>	6.26	Comment	<b>6.26</b> This paragraph mentions the HELAA (?) and says that there is potential for 1200 dwellings on Brownfield sites within the main towns and 600 on Lea Castle. So, another 2000 dwellings which added to the over 2000 dwellings already started or committed as shown in 6.4 takes us very near the total required by 2034. Or is some of this double counting?	This is referring to the housing capacity of potential site allocations on brownfield land within the main towns and the additional 600 at Lea Castle (pdl area). The point being made is that there is not enough brownfield land to accommodate all of the housing requirement. There is no double counting included in the figures.
	<a href="#">LPPO4719</a>	6.27	Comment	<b>6.27</b> Proposes the removal of 2% of all land from the Green Belt. Why? Given the above amount of housing	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local

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				<p>on Brownfield or already committed which does not require this to happen at this moment.</p> <p>Building houses takes time. I would imagine from watching the development on Silverwoods which is still not completed we are talking at least 10 years into the future before any release of Green Belt land needs to be considered and reviewed. We are all aware of how goal posts keep changing as Government's change and Brexit will have an influence as well as what happens in the rest of the West Midlands.</p>	<p>Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>
	<a href="#">LPPO4813</a>	6.27	Comment	<p>We are told that this Local plan will only use 2% of the Green Belt. Why does this 2% have to be contiguous with the existing developments? Why can't this 2% be separated from the existing developments?</p>	<p>Development needs to be located in sustainable locations. Next to existing urban areas with local services are sustainable locations. The new development can also help to support and sustain the existing local services and create new ones. It can also lead to infrastructure improvements such as road junction improvements</p>
	<a href="#">LPPO3933</a>	6.27	Object	<p>6.27 'Therefore to meet the needs of the growing population, removal of around 2% of all land from the Green Belt would be required'</p> <p>This statement would appear contradictory to the fact that the population of Kidderminster has remained static since 1991.</p> <p>The Assessment of Housing Need Report, Section 2</p>	<p>The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036. There will be a marked increase in the number and proportion of older residents. The population aged 65+ years is expected to increase by 28.1% from 24,200 in 2016 to 31,800 in 2036. (Data based on ONS 2016-based Subnational</p>

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				<p>states that the 'Housing Market Area remains unchanged' it also states that 'latest mid year population estimate for Wyre Forest suggests a population of just over 99,500, a 2.7% increase since 2001, well below the Worcs figure of 6.7%, West Midlands, 8.9% and an average rate for England of 10.8%.</p> <p>I would suggest therefore that any reference to population growths would be more accurate if it were deemed, 'anticipatory' growths, and therefore risking removal of Green Belt land for, apparent unknown and unchallenged data, would seem too casual a step to take.</p> <p>Furthermore, 'an ageing population' would imply that natural changes in the current housing stock, would, within the Local Plan period, become available, to meet real or anticipated housing need.</p>	<p>Population Projections).</p> <p>This suggests that the population is not 'static'. For further information please see the updated OAHN Study which will be published on the Council's website during the Pre-Submission consultation.</p>
	<a href="#">LPPO3767</a>	Paragraph 6.27	Object	<p>I object to the Council's strategy; evidence suggests that the population is stable and there is little need for large scale housing. The OAHN document dismisses three independent analysis. The planned urban extensions are unsustainable.</p>	<p>Objection noted.</p> <p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was</p>

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					consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
Wyre Forest Community Housing	<a href="#">LPPO1648</a>	Para 6.27	Support	In respect of the Reasoned Justification (6.27), we fully support the expansion of the Kidderminster urban area and the utilisation of Green Belt land.	Support is noted.
	<a href="#">LPPO4720</a>	6.28	Comment	<b>6.28</b> The Council needs to work proactively together with not only landowners, developers and others who make money from this but with the people of the area it serves. Councillors are elected by us and we pay through our council tax for staff within the Council. Recent events both national and in London have demonstrated what happens when those serving us do not follow the needs and will of the people.	Comments noted.
	<a href="#">LPPO3768</a>	Paragraph 6.29	Object	I object to the Council's strategy and to its distinction of Bewdley and Stourport as market towns; Kidderminster is also a market town.	Objection is noted. Kidderminster was not identified as a 'market town' in the currently adopted Local Plan (see para 5.33 of adopted Core Strategy.) Both Stourport-on-Severn and Bewdley benefitted from their status as 'market towns' under the Advantage West Midlands (AWM) Market Towns Initiative.
	<a href="#">LPPO3772</a>	Paragraph 6.30	Object	I object to the Council's strategy and to its distinction of Bewdley and Stourport as market towns; Kidderminster is also a market town.	Objection is noted. Kidderminster was not identified as a 'market town' in the currently adopted Local Plan (see para 5.33 of adopted

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					Core Strategy.) Both Stourport-on-Severn and Bewdley benefitted from their status as 'market towns' under the Advantage West Midlands (AWM) Market Towns Initiative.
	<a href="#">LPPO3792</a>	Paragraph 6.31	Object	I object to the Council's strategy and to its distinction of Bewdley and Stourport as market towns; Kidderminster is also a market town and should not be used for development unwanted in other areas.	Objection is noted. Kidderminster was not identified as a 'market town' in the currently adopted Local Plan (see para 5.33 of adopted Core Strategy.) Both Stourport-on-Severn and Bewdley benefitted from their status as 'market towns' under the Advantage West Midlands (AWM) Market Towns Initiative.
	<a href="#">LPPO161</a>	6.31	Comment	Stourport is not and never has been a market town. It is correctly described below (6.34) as a canal town but today would be regarded as a Heritage town because of its important canal history. This distinction is important because it provides a focus on what is important about the town, its not shopping nor markets but history, protection of its heritage and tourism.	Objection is noted. Kidderminster was not identified as a 'market town' in the currently adopted Local Plan (see para 5.33 of adopted Core Strategy.) Both Stourport-on-Severn and Bewdley benefitted from their status as 'market towns' under the Advantage West Midlands (AWM) Market Towns Initiative.
Stourport on Severn Civic Society	<a href="#">LPPO1297</a>	Para 6.32	Comment	The historic core of Stourport (Bridge Street, High Street, York Street) offers potential for improvement of flats above shops, enhancing both the townscape and providing residential accommodation.	Comments noted.
Stourport on Severn Civic Society	<a href="#">LPPO1295</a>	Para 6.33	Comment	In Stourport the local infrastructure and road system are already at full capacity, particularly Stourport Bridge and the town centre one-way system. These are limiting factors to any increase in traffic flow.	Comments noted.



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	<a href="#">LPPO165</a>	Housing Option B	Object	The option for additional housing to be built on Rectory Lane will increase already overly heavy traffic, especially at peak times. The Gilgal to the bridge is already subject to long periods of slow moving and even stationary traffic. This also backs up to areas as far as Worcester Road, Wilden Lane and beyond. This also hugely increases health risks from increases pollution from 'idling' engines. Any plan that that uses Green Belt land before fully exhausting all other options, especially Brown Field is to the detriment of future generations.	Objection noted.
	<a href="#">LPPO173</a>	6.38	Comment	As a tourist destination, Bewdley needs a place for coaches to park, within close proximity to Load street to cater for elderly coach parties.	Comment noted.
Wyre Forest Green Party	<a href="#">LPPO1415</a>	Para 6.39	Comment	For Bewdley, the summary states that new developments on Brownfield sites in or adjacent to the town centre are limited by various factors including the Welch Gate air quality management area. This AQMA has been in place since 2003. Despite an action plan the only measure implemented has been a change in priority at the junction of Welch Gate with Dog Lane. The only effective action would be changing Welch Gate to a one way traffic flow or other traffic management measures in Bewdley town centre.	Comments noted.
	<a href="#">LPPO607</a>	Welch Gate air	Comment	Due the problems of stationery traffic it is surprising that the right of way has not been changed (say for 12 months) to monitor the Air Quality in Welch Gate.	Comment noted.

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		quality		Nothing has been done in the 10 years we have been here!	
Worcestershire County Council, Planning Economy & Performance	<a href="#">LPPO1135</a>	Paragraph 6.41	Comment	Suggest amend to last sentence to read, "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."	Comment noted and agreed.
	<a href="#">LPPO4721</a>	6.42	Comment	<b>6.42</b> Horsiculture? Surely we don't need to use made up words.	Comment noted. 'Horsiculture' is the commercial development of the countryside for pasturing or exercising horses.
Land Research & Planning Associates Ltd	<a href="#">LPPO551</a>	6.44	Comment	<b>We agree that sustainable living in rural areas is as important as urban areas though do not see how this is being addressed.</b>	Comment noted. It is being addressed through the policies within this emerging Local Plan, some of which relate specifically to rural areas.
	<a href="#">LPPO3680</a>	6.44	Object	6.44 There is no evidence to support how this element will be satisfied. Commuting further distances will be the result of the increased development as Kidderminster becomes a soulless commuter town.	Objection noted.
Land Research & Planning Associates	<a href="#">LPPO552</a>	6.45	Support	It is essential that the Revised Local Plan needs to take into account the points made previously.	Support and commented noted.

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Ltd					
CORE11	<a href="#">LPPO238</a>	6-45	Support	Support for paragraph 6.45.	Support noted.
Summerfield Against Land Transformation	<a href="#">LPPO1616</a>	6.45	Comment	We reject your approach to the Local Plan and its reliance upon housing, indeed being housing led. Given both the population dynamics and economic concerns we believe that your strategy should be reversed i.e. it should be economic development led. You should seek to stimulate the economy e.g. rate relief and grant giving, work more closely with local employers e.g. with SVR and the Safari Park, seek to stem job losses and improve educational performance and thus the qualification base of the workforce. It is our belief that such a course would stimulate the economy, create vibrancy and lead to and support subsequent housing development.	Comment noted. The Local Plan also has an employment land requirement to meet. See the Employment Land Review Study for further details. This ELR study has helped to inform the plan and the sites allocated for employment use.
	<a href="#">LPPO3681</a>	6.46	Object	6.46 How will extra monies be available? There is no evidence in your proposals. How will Kidderminster fund the extra health, transport, waste disposal, schools, pre-schools and nurseries, care in the community, libraries and parks to name but a few of the services which will be under greater demand. I understand there are monies to be made available for developments in Churchfields urban village – but there is no evidence in your plans to show how this will benefit the Spennells side of Kidderminster.  The grants you propose will be received from the	The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements for the emerging Local Plan.

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY (excluding paragraphs 6.54-6.57)**

Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				Government, local enterprises and private investment will be insufficient to fund the needs of the huge influx of residence you propose.	
Worcestershire County Council, Planning Economy & Performance	<a href="#">LPP01137</a>	Paragraph 6.46	Comment	<p>This paragraph usefully makes reference to the securing finance for the implementation of sufficient supporting infrastructure, and the need for a critical mass of development to enable the effective provision of sufficient infrastructure, which we support. This raises two additional issues:</p> <ol style="list-style-type: none"> <li>1. Cross reference to comments on the infrastructure delivery plan and the viability assessment which provide evidence of both the infrastructure need and the financial challenge that exists in securing contributions. In particular that it is unlikely that development alone will pay for the delivery of infrastructure and external funding will be required from different sources.</li> <li>2. Some of the infrastructure required may be outside of Wyre Forest District because of the impact of Wyre Forest residents and businesses on the wider transport network, for example. Whilst schemes outside of the district cannot be allocated in this local plan, they can be listed in the IDP and the second bullet on the provision of infrastructure could be expanded to include: "to enable effective provision of directly related infrastructure in the district and in</li> </ol>	Comments noted. We look forward to working with Worcestershire County Council as we shape the Infrastructure Delivery Plan further for the emerging Local Plan.

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				neighbouring authorities".  The final sentence in 6.46 may risk raising unrealistic expectations, especially as the term "real benefit" is abstract, and would benefit from qualifying, such as real benefit to the district as a whole.	
	<a href="#">LPPO3749</a>	Paragraph 6.46	Object	I object to the Council's strategy and thinking for development, linked to funds becoming available to justify the scale of development. We do not need towns to grow beyond their natural size for their setting by adding more roads, schools, shops and industrial units on the outskirts of the town centres. Instead regenerate its town centres.	The Infrastructure Delivery Plan (IDP) sets out the infrastructure requirements for the emerging Local Plan.
	<a href="#">LPPO3786</a>	6.47	Object	Persimmon Homes, inadvertently, provided the catalyst to the level of debate that the residents of Wyre Forest now find themselves involved in. I personally believe the Green Belt Review and the LPR document would have slipped through very much unnoticed if Persimmon hadn't made a fundamental mistake.  I do not feel the consultation process to be fair, inclusive or within the spirit of the NPPF. I have had to actively seek access to all documents that have helped shape my opinion — even requesting that documents were correctly, chronologically ordered on WFDC portal. The language and terminology used can be at best described as ambiguous. This would have negated	The Preferred Option Plan and the supporting evidence base documents were made available on the Council's website for public viewing throughout the whole of the consultation period, and remain on there now. The documents were also available at the eight drop-in sessions held throughout the District during the consultation event. Hard copies of the Preferred Options Plan was also available at the Council Hob and local libraries in the District.

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				many residents being able to fully comprehend the magnitude of the proposed options. I believe the Local Plan Review to be biased in its writing and a cynical approach taken to the presentation and timing.	
	<a href="#">LPPO3794</a>	Paragraph 6.47	Object	I object to the Council's strategy and thinking for development. There is no objective evidence to support the perceived large scale development. The figures are false, derived for the Council as a paid contractor which is dismissive of independent analysis. The scale of development is unnecessary. It is poor land use policy to simply blight perfectly good Green Belt due to the Council's inability to drive through good efficient development of Brownfield and inner town development. Simply adopting the least resistance is a mark of poor direction and ability by the Council. This provided residents with low confidence of the ability of the Council to properly look after its existing residents to the Area and points to it not having the required skills in place to tackle more challenging issues.	There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO4149</a>	6.47	Object	Fairness should be observed – currently the Local Plan is biased towards Option A which unfairly shoulders the greatest loss of Green Belt and the greatest number of new houses built in one big mass, as well as a new road cutting straight across the peaceful countryside.  The Local Plan is written in totally biased language. Examples are seen in Table 6.06, Comparison	Objection and comments noted.

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				<p>of Option A and Option B:</p> <ol style="list-style-type: none"> <li>1. Option A looks to <b>minimise the number of sites</b> in a more concentrated strategy whilst for Option B a greater number of sites will be required and overall a more dispersed strategy</li> <li>2. Option A is more likely to <b>enable viable provision of affordable housing</b></li> <li>3. Option A <b>enables the building of Kidderminster Eastern Relief Road</b> which would:</li> <li>4. Provide access for the new development to the east of Kidderminster</li> <li>5. Enable S-NE traffic to by-pass Kidderminster altogether en route to M5 motorway and Birmingham</li> <li>6. Help relieve congestion on A449 and in Kidderminster (Ring Road, Horsefair etc)</li> <li>7. Help facilitate an improvement in AQMA at Churchfields (<i>what does this mean?</i>)</li> <li>8. Option A will not impact as much on A451 and A449 as larger Lea Castle Scheme (Option B)</li> <li>9. Option A <b>maximises the benefit of proximity to Kidderminster rail station</b> (<i>It is at least 2 miles and unwalkable</i>)</li> <li>10. Whereas Option B <b>would not enable</b> the building of the Kidderminster Eastern Relief Road and the benefits this scheme allows</li> <li>11. In Option B -Additional development at Lea</li> </ol>	

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				<p>Castle will put additional pressure onto A451 and A449 from the north into Kidderminster</p> <p>12. In Option B – Additional development to west of river, particularly at Arley Kings is likely to have a negative impact on Stourport on Severn and the river crossing</p> <p>It is clear that the planners favour Option A on the basis that they can have a new Eastern Bypass that was denied them years ago when original scheme was scrapped.</p>	
	<a href="#">LPPO4834</a>	6.47	Object	<p>The Local Plan has been designed to present the case as a clear choice between Option A or Option B, although some clarification has now been offered that all aspects of the Plan can still be challenged. This has meant that local people were being asked to comment upon a Plan which was not fairly or accurately presented. The Plan as presented was clearly weighted towards the so-called advantages offered by Option A (such as the building of an Eastern Relief Road), while presenting the disadvantages of choosing Option B (less provision of local infrastructure). The architects of the Plan had clearly already decided which Option they preferred so the Plan was not offered in a balanced or even-handed way, thus not presenting the case fairly.</p>	<p>Objection noted. Comments could be made on any of the sites within the plan and the large number of consultation responses we have received has proved that this worked effectively. In particular, para 6.57 of the Preferred Options document asked specifically if there were any other alternative options that the public would like to suggest.</p>
	<a href="#">LPPO4783</a>	6.47	Object	<p>I object to the unfairness of weighting given to the paragraphs 6.55 and 6.56. Option A is proposed in a positive light, stating what it could supposedly help</p>	<p>Objection and comments noted.</p>



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				and Option B is placed with negative arguments about possible problems it might entail. This means that the initial proposal has been made on unfair grounds, with its influential wording affecting people’s thoughts, before giving them a fair chance to look at the pros and cons independently and giving them a fair chance to make up their own minds.	
	<a href="#">LPPO4867</a>	6.47	Comment	I would urge the Council to review its housing need and figures, and guarantee that all Brownfield sites are used before any Green Belt land is released.	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.
	<a href="#">LPPO5129</a>	6.47	Comment	<p>The Wyre Forest DC plan was not put forward in a fair way. The campaign against it did more to publicise it than the council did. The council intended to hold no drop-in information event for Spennells, the area most affected by the proposal, despite other less affected areas getting such drop-in events. Why not? There only was one in Spennells thanks to the effort of a Spennells councillor to stop this bias.</p> <p>The plan itself presents the Core build sites as non-</p>	Objection noted. Comments could be made on any of the sites within the plan and the large number of consultation responses we have received has proved that this worked effectively. In particular, para 6.57 of the Preferred Options document asked specifically if there were any other alternative options that the public would like to suggest.

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				negotiable and pressures residents to support Plan A as the "preferred" plan, discouraging anything but picking A or B or objecting to any part of the Core, such as behind Spennells.	
	<a href="#">LPPO2936</a>	Paragraph 6.47	Object	<p>How does the Local Plan ensure deliverability? Greenfield sites are cheaper to develop and are very attractive to developers and conflict with the profitability of Brownfield sites, where issues of existing and precious old buildings, land clearance and cleansing constrain profits. The LPR must make clear stronger requirements for the development of the Green Belt released sites, the need to 'add' environmental gain. Details are given for the need to relieve traffic congestion in Kidderminster with the Eastern Relief Road, but robust green infrastructure is also vital to enhance new and existing communities.</p> <p>The viability problems of Brownfield sites seem to be lacking any solution, so areas will remain blighted for the plan period. There are significant landscape considerations for wide rural and Green Belt areas of the district, whereas for others who live in more urban areas, landscape value is just as significant and should be evidenced as such, through robust policy for the development sites. It is not just a matter of funding a new road, but ensuring other areas are developed on an economic level playing field.</p> <p>It would be appropriate to see a similar set of</p>	Objection and comments noted.

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				<p>safeguards for these proposed release areas as exist for rural areas of Wyre Forest, to ensure a high standard and positive contribution to make a place 'unique'. Clear parameters for green infrastructure would even the economic playing-field of development.</p> <p>In proposing release of Green Belt, policy addressing environmental matters such as sustainably built housing- low carbon and greenhouse gas emissions and ability to accommodate the impacts of climate change over the plan period are not given sufficient importance for the development process. These matters should be evident in the LPR, so these sites contribute to the locality in the way that rural areas can and do.</p>	
Hurcott Village Management Committee	<a href="#">LPP01625</a>	6.47 - viability	Comment	<p>Large areas of Wyre Forest, currently owned by developers who have designated planning permission, are not being developed due to a lack of financial viability. While these areas remain undeveloped Wyre Forest is being forced to consider other sites. Surely the structure and details of the Local Plan should be in the hands of WFDC and not potential developers.</p>	<p>Comments noted. The Council does work with developers/landowners to bring forward the more challenging sites on brownfield land for development. The Council will also use its compulsory purchase powers where necessary.</p>
Spennells Against Further Expansion	<a href="#">LPP01744</a>	6.47	Object	<p>It is remiss of Wyre Forest District Council that they did not make it clear early enough to residents that all areas suggested in the draft local plan can be commented upon. Many people are of the impression that they have to choose between one of two packaged-up options and that "Core" areas which are</p>	<p>Objection noted. The Sustainability Appraisal and the Site Selection Process Topic Paper set out the process the Council has undertaken to identify the proposed allocation sites. The HELAA document has also informed this process. These documents will be available for</p>

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				<p>incorporated in both options are a “done deal”.</p> <p>By presenting the Draft Local Plan proposals in this way, the District Council has effectively disenfranchised comment. It is only recently (Express and Star 3/08/17) that the WFDC press releases have not implied a fixed choice. By changing the presentation of the consultation mid-way through, not all residents have had time to understand that any site can be commented upon or alternative suggestions be made.</p>	<p>public viewing during the pre-submission consultation.</p>
Taylor Wimpey West Midlands	<a href="#">LPP01491</a>	Paragraph 6.47	Comment	<p>Urban Extensions vs Dispersal</p> <p>In addition to a 20% buffer different types of sites in different locations should be included. If one/ two large urban extensions are exclusively proposed to deliver the dwelling requirement, there is the risk that in the short term no dwellings will be delivered as the administrative tasks associated with large schemes inevitably take longer to be processed, there are possibly multiple land owners that will need to be satisfied when preparing and executing the S106 and often significant infrastructure is required and is necessary to be delivered before the construction of dwellings can commence. An example of where this have recently happened is in Rugby Borough, where only two large urban extensions were proposed and as a result of the issues identified above, the Council</p>	<p>Comments noted.</p>

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				<p>failed to demonstrate a five year land supply (which is still the case and has been ever since their Core Strategy was adopted in June 2011). One of the two extensions, due to its scale, will now not be required within the plan period. The Council is now rectifying this issue through a review of the Plan, which extends the plan period and includes new smaller deliverable sites to plug the gaps.</p> <p>Whilst it is good planning practice to reap the benefits of large scale development on the urban edge to comprehensively plan a neighbourhood and secure the delivery of required infrastructure, it is important that housing delivery is maintained throughout the plan period to enable households to form as and when they need to. The best way this can be achieved is through identifying additional sites elsewhere in the District. Further, different housing needs and preferences exist across the District and, therefore, to provide choice and variety to households, in a sustainable manner, is beneficial. This is particularly so when new housing is often a more popular choice for first time buyers given the support provided through the successful 'Help to Buy' initiative. Alternatively, households may choose to relocate elsewhere outside of Wyre Forest, which would be potentially detrimental to the local economy.</p> <p>Whilst housing should be located in the most sustainable locations from the perspective of</p>	

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				<p>minimising the need to travel, there are a number of social benefits to locating homes in more rural locations (i.e. sustaining local services, allowing families to live nearby relatives and, inevitably, achieving a balanced population to help a location to thrive). Development can bring with it much needed facilities and infrastructure to communities, which could improve the quality of life for residents. It is therefore important that a reasonable level of development is dispersed to deliver sustainable communities across Wyre Forest. This should, however, not undermine the vision for a comprehensive urban extension to the south and east of Kidderminster and the strategic benefits this could deliver.</p> <p>In terms of the proposed options put forward by Wyre Forest in the Preferred Options Draft Local Plan Review, Option 'A' seeks to locate concentrated development outside the main towns to two urban extensions and Option B seeks to deliver two smaller urban extensions and a more dispersed strategy elsewhere. Whilst both options have their merits, it is considered that a combination of both Option 'A' and 'B' would provide both deliverable and sustainable growth in Wyre Forest for the reasons identified above.</p>	
	<a href="#">LPPO4643</a>	6.47	Object	The Local Plan is not in accordance with the guidelines	Objection and comments noted.

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				<p>for Public Consultation and recognised best practice so should be revisited and also cover Blakedown.</p> <p>I believe the plan/some supporting documentation is biased to Option A.</p> <p>The promise to develop all brown field sites before Green belt seems false.</p> <p>I think we need 3000 houses not 6000 on a site to include a Drs/school with only Lea Castle/land behind Spennells and the Comberton/Offmore Core being big enough.</p>	
	<a href="#">LPPO4829</a>	Development Strategy	Comment	<p>The plan identifies as Core Sites the development of 3640 dwellings, the bulk of which fall in Green Belt on the eastern side of Kidderminster. In particular (OC/6), (OC/13) and (WFR/ST/2). In addition Option A includes (WFR/ST/2) and (AS/10) together providing together 930 dwellings.</p> <p>Firstly I would question the need for the provision of an additional 5400 dwellings and therefore the need for substantial development on the Green Belt. I would question whether there has been a rigorous enough assessment of Brownfield sites within the District.</p> <p>The Strategic Housing Land Availability Assessment shows a potential of 4475 dwellings which would go a</p>	<p>Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				<p>long way to meeting housing need. I would contend that these are obvious Brownfield sites. If Kidderminster is to be promoted as a vibrant “city living location” there may well be scope for further mixed use redevelopment within the town.</p>	
	<p><a href="#">LPPO4749</a></p>	<p>6.47</p>	<p>Object</p>	<p>I personally believe the Green Belt Review and the LPR document would have slipped through very much unnoticed if Persimmon hadn’t provided the catalyst to the level of debate that the residents of Wyre Forest now find themselves involved in.</p> <p>I believe the Local Plan Review to be biased in its writing and a cynical approach taken to the presentation and timing. Land should be sold as Green Belt/agricultural land and the value reflected as such – especially as this is still a consultation period.</p> <p>Otherwise in my opinion it looks as if it is inducement and allows developers to land bank and bully local councils. The fields were neglected for the purpose of photographs (whilst previously rotational fallow field farming practiced).</p> <p>I also feel concerned that areas are ringfencing themselves with ‘Neighbourhood Plans’ with Stone Parish Council (of which 40% of the proposed Option A falls within), lagging behind.</p> <p>Planning, has made many mistakes that have led to the</p>	<p>Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>



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				<p>downturn of the town centre. It was only a matter of time once Crossley Park and Weavers Wharf were developed that flagship stores would move to a location with doorstep parking. The development of the new leisure complex out of town is a huge blow to Kidderminster town centre, and is rife with errors of its own. The new relief road has only managed to move traffic issues from Stourport Road Island further down A449 towards Hoobrook. Impacting on Spennells Valley Road, Wilden Lane and A449 Northbound from Black Bridge.</p> <p>The future of Kidderminster must start with rejuvenation of the town centre spreading outwards. The large units will never attract new business. The current financial climate would make the risk of undertaking a retail unit of that size too great. Breaking the buildings up into low rise apartments with small artisan retail units interspersed would be the best option. Include pockets of green space and trees, with seating. The local schools and college should be encouraged to run small businesses as part of educational programmes. Design students encouraged to group together and run a cooperative – showcasing their individual talents. The canal side and tourism exploited for its maximum potential. The access routes into the town centre need to be made safer and more attractive. On the protest march I noted the extent of the vandalism and stench in the underpass – I certainly</p>	

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				<p>wouldn't walk there alone or encourage my daughters or any tourist to.</p> <p>Offering Option A or Option B is a divisive and dangerous tactic – one that splits communities and gives way to resentment. Who am I to say that the Green Belt in Kidderminster is more important than the Green Belt in Stourport? If the projected growth figures are accurately calculated it will be unnecessary to develop on any Green Belt land. If WFDC harnessed the passion raised by this consultation and worked with residents then maybe we may achieve something lasting and worthwhile.</p> <p>I must ultimately conclude that WFDC are happy to support a document that is biased in its writing and statistically incorrect; or the Councillors themselves are not qualified to read and interpret the data presented. If this is so then the residents of Wyre Forest are not being offered a fair and inclusive consultation. I urge WFDC and politicians at every level to listen to the residents – the very people who elected you, the very people you represent, the very people who you serve.</p>	
	<a href="#">LPPO4777</a>	6.47	Object	<p><b>Bias in structure of “options”.</b></p> <p>The Sustainability Appraisal describes the two options presented in the Draft Local Plan as follows: <i>A.13 The</i></p>	<p>Objection noted. Comments could be made on any of the sites within the plan and the large number of consultation responses we have received has proved that this worked</p>

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				<p><i>preferred options are for Option A to be more contained with an urban extension to the east of Kidderminster and for option B to be a more dispersed approach.</i></p> <p>WFDC website describes the Draft Local Plan proposal this way: <i>The Preferred Options document sets out 2 possible options for potential sites of new development. It seeks to identify and allocate land only, detail for each site would be subject to a planning application.</i></p> <p>WFDC did not make it clear early enough to residents that <u>all areas suggested</u> in the draft local plan could be commented upon. Many people are of the impression that they have to choose between one of two packaged-up options and that “Core” areas which are incorporated in both options are a “done deal”.</p> <p>In The Shuttle of 15th June, the consultation is presented this way: <i>The council is proposing two options - one option sees additional development concentrated to the east/south of Kidderminster, while the second option would see growth more widely dispersed, particularly around Stourport and adjacent to Lea Castle.</i></p> <p>By presenting the Draft Local Plan proposals in this way, the District Council has effectively</p>	<p>effectively. In particular, para 6.57 of the Preferred Options document asked specifically if there were any other alternative options that the public would like to suggest.</p>

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				<p>disenfranchised comment.</p> <p>It is only towards the end of the consultation that the WFDC press releases have changed their tune. For example, the Express &amp; Star (3 August 2017) quotes from the WFDC press release this way: <i>Comments can be made on any of the sites proposed for development and alternative suggestions made before 5pm on August 14. The final draft plan may include a combination of sites from the options put forward and from new suggestions.</i></p> <p>There is no strong push here for the two preferred options. By changing the presentation of the consultation mid-way through, not all residents have had time to understand that any site can be commented upon or alternative suggestions be made.</p> <p><b>Bias in Content of “Options”</b></p> <p>In the presentation of the two preferred options (in Appendix E of the Sustainability Appraisal), Option A appears to have more plusses and less minuses than Option B. However, this is false for the following reasons:</p> <ul style="list-style-type: none"> <li>• The “Eastern Relief Road” is not necessarily a benefit.</li> <li>• There is no evidence that a road, for which</li> </ul>	

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				<p>there is no detail, will “help reduce traffic congestion in the town centre”.</p> <ul style="list-style-type: none"> <li>• Option A is claimed to have a significant improvement “on traffic issues and the AQMA around the Horsefair in Kidderminster.” Any traffic amelioration measures which take place at the Horsefair can be done in conjunction with a redevelopment of the sites at Churchfields and are completely independent of housing development and roads at Spennells.</li> <li>• There is a claim that Option A will “enable more effective school provision” by concentrating over 1000 homes in one area – however, there is no guarantee any school will be built.</li> <li>• Concentrated development to the east of Kidderminster is said “to provide additional services and facilities such as infrastructure, shop, school, cycleways and footpaths.” This could equally be said for a concentrated development in any area.</li> </ul>	
	<a href="#">LPPO4916</a>	6.47	Object	I believe the plan is biased to Option A as is some of the supporting documentation. Also, it is fact that no “drop in session” was originally planned for the impacted people of Spennells which is another indication of unacceptable bias to Option A	Objection noted.

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	<a href="#">LPPO2734</a>	6.47 Document Bias	Comment	<p>Wyre Forest District Council (WFDC) demonstrate a biasedness towards Option A throughout the Local Plan and as such I particularly object to Option A; the large scale, landscape dominating development, located on the periphery of Kidderminster which would not be sustainable in relation to access to existing infrastructure (particularly public transport and sustainable transport infrastructure). The Local Plan states that Option A would “maximise the benefit of proximity to Kidderminster rail station and links to the national rail network”. Kidderminster station is over two miles from the proposed location of Option A and this distance is not considered to be within the boundaries expected.</p> <p>It is evident that the ambition to construct a bypass is the focus of this option and the housing is the secondary priority, which is contrary to the guidance included in Manual for Streets. Air Quality and noise impacts are national priority with policies such as Clean Air Zones increasingly common place. The Local Plan states that Option A would “help facilitate an improvement in AQMA in Churchfields”, however constructing a bypass to “enable S-NE traffic to bypass Kidderminster altogether en route to the M5 motorway and Birmingham” suggests that there is unlikely to be any net change in air quality across Kidderminster. Regardless of housing delivery, is there not an option to upgrade the existing road network</p>	Comments noted. The Infrastructure Delivery Plan (IDP) sets out what infrastructure requirements will be required to support the emerging Local Plan and the funding that will be required to delivery this infrastructure. A Transport Assessment study is being undertaken as part of the final stage of Plan making and will be made available for public viewing during the Pre-Submission consultation.

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				<p>such as the A450/Worcester Road – if a road can be delivered over a rail track then there are not any reasons to suggest that the bridge with the A449/A450 could not be improved? In addition, Spennells Valley Road is good quality and rarely suffers from congestion – it’s the Worcester Road/Chester Road/Wilden Lane roundabout that is the issue.</p> <p>Based on the documents within the public domain, WFDC do not have a robust evidence base to objectively demonstrate that Option A is a viable site for housing. Engineering constraints such as the rail track and lack of physical boundary to redefine the Green Belt make delivering housing and the bypass undeliverable, particularly if you are to achieve your affordable housing targets (as WFDC are likely to want developer contributions towards the bypass). Stanklyn Lane cannot be used as a physical boundary to redefine the Green Belt as this would result in the merging of two distinct places, which is contrary to the National Planning Policy Framework guidance. In addition, at the drop-in consultation sessions, WFDC stated that they have not completed any transport modelling or early assessment work to prove that an Eastern Bypass would relieve congestion or that the levels of demand are likely to justify the construction of a bypass (and offer value for money). If no technical work has been completed that suggests that the Eastern Relief road could benefit Kidderminster’s</p>	

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				<p>highway network, then WFDC should not be stating the potential benefits of the road. Alternatively, if WFDC have completed some initial feasibility work then they should be sharing this with the public. However, the fundamental issue with identified this site in the first place, as with all the other sites, is the poor technical evidence informing the identification that 5,400 (300 per annum) houses are needed over the Plan period. The Local Plan states that Option A would “help facilitate an improvement in AQMA at Churchfields”. This statement also suggests that some level of transport modelling has been undertaken and if it has not, then this statement is misleading and misinformed.</p> <p>The Local Plan also states that Option A will “help facilitate Kidderminster regeneration”, however the Green Belt Review Strategic Analysis (September 2016) suggests that the majority of the sites proposed in the Local Plan including Option A have a “low contribution” to regeneration. It is not clear from this document whether they will have a low contribution in terms of being developed in future or whether they currently have a low contribution. Nonetheless, Option A scores the same as many of the parcels in Option B and as such Option A contributes no more to regeneration than Option B does, hence the statement in the Local Plan is incorrect based on the assessment in the Strategic Analysis document.</p>	



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	<a href="#">LPPO3826</a>	6.47	Object	The Draft Local Plan has been presented with a definite bias in favour of Option A (eg. Appendix E of the Sustainability Appraisal). Promises of improvements in infrastructure to meet the demands of new residents should also apply to Option B. The repetition of the “benefit” of an Eastern Relief road only available in Option A is not only biased, it is completely lacking in evidence. No route or traffic model has been provided; claims made that such a road would help regenerate Kidderminster and improve air quality at Churchfields lack any factual evidence; the A450 already takes traffic from the A449 to the A448 and the A456 so a “relief road” is not needed. A new road would in fact bring increased air and noise pollution to the heavily populated Spennells estate as well as causing distress to local wildlife.	Objection and comments noted.
	<a href="#">LPPO2665</a>	6.47	Object	I believe the plan is biased to Option A as is some of the supporting documentation. Also, it is fact that no “drop in session” was planned for the impacted people of Spennells which is another indication of unacceptable bias to Option A.	Objection and comments noted.
Wyre Forest Green Party	<a href="#">LPPO1480</a>	6.47	Object	It is remiss of Wyre Forest District Council that they did not make it clear early enough to residents that all areas suggested in the draft local plan can be commented upon. Many people are of the impression that they have to choose between one of two packaged-up options and that “Core” areas which are	Objection noted. The Sustainability Appraisal and the Site Selection Process Topic Paper set out the process the Council has undertaken to identify the proposed allocation sites. The HELAA document has also informed this process. These documents will be available for public viewing during the pre-submission

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				<p>incorporated in both options are a “done deal”.</p> <p>By presenting the Draft Local Plan proposals in this way, the District Council has effectively disenfranchised comment. It is only recently (Express and Star 3/08/17) that the WFDC press releases have not implied a fixed choice. By changing the presentation of the consultation mid-way through, not all residents have had time to understand that any site can be commented upon or alternative suggestions be made.</p>	consultation.
Gladman Developments Limited	<a href="#">LPPO1419</a>	para. 6.48	Object	Gladman note suggested provisional requirement of 6000 dwellings against requirement of 5400 giving a 10% contingency against claimed OAN. However, we would recommend using a 20% contingency made up of small and medium sized sites across wide range of sustainable settlements throughout the hierarchy. This would demonstrate an effective strategy that provides sufficient flexibility against reliance on large strategic sites and Brownfield sites. Likelihood of large strategic sites delivering beyond plan period should be acknowledged. If BW FOAN figure is used then requirement would be 7171 dwellings (332 x 18 +20%) rather than 6000.	There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	<a href="#">LPPO4722</a>	6.48	Comment	<b>6.48</b> The figures in the table 6.0.3 do not appear to reflect the figures given in other council sources for the amount of dwellings nearly completed and in the pipeline. There is no timeline in these figures. Are they	Comments noted. The dwelling completions in the table were the number of completions since 1 <sup>st</sup> April 2016 up to 1 <sup>st</sup> April 2017. This information will be further updated in the pre-

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				are what is proposed immediately, what is in the pipeline already and what is assumed to be available from the 2 Options we are asked to comment upon? As mentioned in my comments on 6.4 about the published figures to not relate to the numbers in this table so a fuller explanation of what the council has already agreed to, what is likely to happen anyway within the 2 options (Sladen School, Sion Hill, Victoria Cricket Ground et al) so that the residents in these areas can make informed comments rather than just the NIMBY response that lack of clarity encourages.	submission plan document and the Five Year Housing Land Supply Report.
	<a href="#">LPPO3798</a>	Paragraph 6.48	Object	I object to the Council's strategy and thinking for development; here is no requirement to allocate in excess of a perceived housing requirement of 5400 dwellings.	There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO481</a>	paragraph 6.49	Object	I do not believe there is a shortage of properties required therefore we do not need to release more land.	There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to

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					inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO3800</a>	Paragraph 6.51	Object	I object to the Council's strategy for development; evidence shows that the scale is unnecessary. However <b>I prefer Option B</b> notwithstanding I object to the analysis re scale of development.	Objection noted.
	<a href="#">LPPO4012</a>	Paragraph 6.57	Comment	Surely it would be much wiser to relocate to Stourport or Kidderminster where the current travelling community reside. Especially as the roads would be more suited to heavy traffic.  I hope you read through all of the points raised before making your final decision, thank you for taking the time to do this.	Comments noted.
	<a href="#">LPPO482</a>	paragraph 6.51	Object	I object to both Option A and B	Objection noted.
	<a href="#">LPPO400</a>	6.51	Object	<ul style="list-style-type: none"> <li>I object to Option A and Option B.</li> <li>Green Belt land should be used only as a VERY LAST RESORT.</li> <li>Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collaborate and</li> </ul>	Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need

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				<p>collectively review overall Brownfield site availability and plan housing development accordingly – decisions to build on the Green Belt should not be based on local authority boundaries.</p> <ul style="list-style-type: none"> <li>• The 5 year rolling time frame for construction sites should allow for regular reviews of Brownfield sites and enable changes to be incorporated into any plan.</li> <li>• The plan fails to recognise changes in shopping habits and unrealistically targets retail expansion and comparison shopping. Kidderminster has suffered from the failure to 'tidy up' following the migration of Kidderminster town centre to Weavers Wharf and Crossley Retail Park. Many retail premises left behind have been empty for 8 /9 years. The regeneration of such sites require radical solutions for alternative use that reduce any need to build on the Green Belt. On this basis unnecessary decisions are being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping (indeed, the plan itself demonstrates an inability to predict /understand short term population levels in the District).</li> <li>• The plan fails in its stated aim to. Instead it aims to justify what developers want to deliver</li> </ul>	<p>is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				<p>rather than meet the needs of Kidderminster residents.</p> <ul style="list-style-type: none"> <li>• Previous attempts to build an Eastern relief road have failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph road following the same route as the existing road from the Worcester Road through Mustow Green to the Birmingham Road - is it really a relief road at all?</li> <li>• Whilst at first sight constructing a new school in the Spennells area appears attractive this (together with the promise of the 'relief road' shouldn't be the determining factor when opting to build on the Green Belt – other options should be sought.</li> <li>• Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years. This situation equally relates to the areas covered by the LEPs identified in the plan.</li> <li>• Whilst economic development in Kidderminster will be welcome - past experience shows this will take time – in the meantime people will continue to travel.</li> <li>• The immediate need is for fresh radical</li> </ul>	

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				<p>thinking that optimises the use of Brownfield sites throughout the LEP areas for residential use and enables Kidderminster itself to become a modern, contained and attractive town centre that incorporates retail leisure and residential opportunities rather than pursue outdated models from the past - 'mixed use' communicates little other than the elements of 'wishful thinking' so often reported in the local press over numerous years.</p>	
	<a href="#">LPPO422</a>	6.52	Object	<p>I object to Option A and Option B.</p> <p>Green belt land should be used only as a VERY LAST RESORT.</p> <p>Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collaborate and collectively review overall brown field site availability and plan housing development accordingly – decisions to build on the green belt should not be based on local authority boundaries.</p> <p>The 5 year rolling time frame for construction sites should allow for regular reviews of brown field sites and enable changes to be incorporated into any plan,.</p>	<p>Objection noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				<p>The plan fails to recognise changes in shopping habits and unrealistically targets retail expansion and comparison shopping..</p> <p>Kidderminster has suffered from the failure to 'tidy up 'following the migration of Kidderminster town centre to Weavers Wharf and Crossley Retail Park.</p> <p>Many retail premises and the courts building have been empty for 8 /9 years - the regeneration of such sites require radical solutions for alternative use that reduce any need to build on the green belt.</p> <p>Unnecessary decisions are being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping (indeed, the plan itself demonstrates an inability to predict /understand short term population levels in the District).</p> <p>The plan fails in its stated aim to "to use a robust and up-to-date evidence base to ensure that the local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" . Instead it aims to justify what developers want to deliver rather than meet the needs of Kidderminster residents.</p> <p>Previous attempts to build an Eastern relief road have</p>	



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				<p>failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph road following the same route as the existing road from the Worcester Road through Mustow Green to the Birmingham Road - is it really a relief road at all?</p> <p>Whilst at first sight constructing a new school in the Spennells area appears attractive this (together with the promise of the 'relief road' shouldn't be the determining factor when opting to build on the green belt – other options should be sought.</p> <p>Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years. This situation equally relates to the areas covered by the LEPs identified in the plan.</p> <p>Economic development in Kidderminster will be welcome - past experience shows this will take time – in the meantime people will continue to travel.</p> <p>The immediate need is for fresh radical thinking that optimises brown field sites throughout the LEP areas for residential use and enables Kidderminster to become a modern, contained and attractive town centre that incorporates retail leisure and residential</p>	

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				opportunities rather than pursue outdated models from the past - 'mixed use' communicates little other than the elements of 'wishful thinking' so often reported in the local press over numerous years.	
Campaign to Protect Rural England	<a href="#">LPPO923</a>	Table 6.0.1	Object	We believe the Plan's Housing Requirement is not the Objectively Assessed Need, but a highly subjective one, taking into account irrelevant factors. The 2016 OAHN Amion report came up with a figure in line with recent delivery and this is a good indication of what is needed. Our report (see attached) shows an OAHN of 229 pa making a total of 4122 over the plan period. This is not much more than urban and Brownfield capacity and would need minimal Green Belt release.	There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO155</a>	6.0.1	Comment	My comments relate to the housing needs assessment and the impact it has on the proposed sites allocation later in this document.  Whilst I have no issue with the detailed assessment carried out by Amion, I do not believe the conclusions reached are sufficiently robust to justify the proposed allocation of green belt land at this time. The report suggests that the housing needs assessment indicated additional homes ranging from 199 per annum (SNPP) to 291 per annum, but they proposed 300 per annum.	There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.

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				<p>This is an odd conclusion given that:-</p> <ol style="list-style-type: none"> <li>1. The average supply over the last 10 years has been 255 per annum and only in 2 years has 300 been exceeded.</li> <li>2. The report says that over that time there has been "virtually static population growth".</li> <li>3. Local industry is in decline and the impact of Brexit is likely to be negative for the local economy and growth.</li> <li>4. The report states that, at a point in time, there were 1,404 vacant dwellings, but no allowance is made for filling these in the figures.</li> <li>5. There seems to be no allowance for infill development, windfall sites and rural exception sites, nor has any account been made for the conversion of commercial property to provide, for example, flats in the town centre.</li> </ol> <p>It is my contention that a more realistic needs figure would be about 250 per annum, midway in the range of figures quoted in the Amion report and also close to the average of previous years. This results in an 18 year requirement of 4,500 homes, 900 fewer than the recommendation.</p>	

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				<p>If allowances were made for other sources of housing provision as follows, then the need for green field land is reduced:</p> <ol style="list-style-type: none"> <li>1. Assume 30% of vacant dwellings will reoccupied over 18 years, equating to 421 in total or 23 per annum;</li> <li>2. Allowing 10 units to be provided by infill per annum equates to 180 over 18 years;</li> <li>3. Allowing 10 units to be provided by conversion of commercial property per annum equates to a further 180 over 18 years;</li> <li>4. Allowing for 5 rural exception site units to be provided per annum equates to 90 over 18 years;</li> </ol> <p>which add up to a 871 units over 18 years. This reduces the new build requirement to 3629 (4,500-871). These figures almost completely satisfy the requirement shown in table 6.0.3 below without the need for green belt land at this time.</p> <p>It is my submission that the housing need figures be reviewed as my comments suggest.</p>	
	<a href="#">LPPO293</a>	6.0.1	Comment	Figures take Wyre Forest as a whole. May be useful to look at the need for affordable housing, in each of the	Comments noted.

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				three towns individually as the percentage of affordable to market driven may vary immensely.	
	<a href="#">LPPO4717</a>	6.0.1	Comment	<p>There is a table in this section which shows a requirement for 5400 dwellings during the period of this report with an annual total of 300 (gained by dividing this total by number of years of the plan).</p> <p>When I look at the document called 'Housing Delivery in Wyre Forest 2015/16 from the Council's website. It shows that:</p> <ul style="list-style-type: none"> <li>• At the end of March 2016 there were 441 dwellings under construction</li> <li>• In table 4 'Wyre Forest Housing Commitments as at April 1<sup>st</sup> 2016' it shows 1583 dwellings as being already committed</li> </ul> <p>If these figures are right (and they are Council figures) then over 2000 dwellings are already in the pipeline towards the total of 5400. It would therefore be useful to have an understanding of where these actual and proposed dwellings are sited so that we can comment on the proposals set out in this document which covers much of the same time period.</p>	The Five Year Housing Land Supply Report sets out the commitments since 1 <sup>st</sup> April 2016. This report can be found on the Council's website.
Victoria Carpets	<a href="#">LPPO1501</a>	Housing Development	Comment	The increase to 300 units per annum (from the 200 per annum in the currently adopted plan) is welcomed in order to ensure the Council are meeting their Objective Assessment of Housing Need.	The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and

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					PPG.  Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO476</a>	Table 6.0.1	Object	I do not believe that Wyre Forest District needs 300 more properties per annum. Also as there is a need for 540 elderly persons accommodation, I believe that a development like some of the developments in Birmingham which are more like village communities where there is a Doctors surgery on site would be more suitable on the Lea Castle Hospital site than 600 houses/flats.	There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO468</a>	Table 6.0.1	Object	Wyre Forest District has a virtually static population growth. Population of Wyre Forest has risen by around 1,200 since 2001, an increase of around 1.2%, and by about 100 persons since mid-2011. ( <a href="http://www.worcestershire.gov.uk/info/20044/research_and_feedback/795/population_statistics/8">http://www.worcestershire.gov.uk/info/20044/research_and_feedback/795/population_statistics/8</a> )	The population of Wyre Forest District is projected to increase by 4.9% over the course of the Plan Period 2016-2036, from 100,000 in 2016 to 105,300 in 2036. There will be a marked increase in the number and proportion of older residents. The population aged 65+years is expected to increase by 28.1%

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				I do not understand why the aim is to build 5,400 new properties over the life of the plan which is 300 per annum.	<p>from 24,200 in 2016 to 31,800 in 2036. (Data based on ONS 2016-based Subnational Population Projections).</p> <p>This suggests that the population is not 'static'. For further information please see the updated OAHN Study which will be published on the Council's website during the Pre-Submission consultation.</p> <p>There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>
	<a href="#">LPPO480</a>	Table 6.0.2	Support	Agree with this table but feel that the proposed developments on Lea Castle Hospital site will impact detrimentally to Cookley village.	Support and comments noted.
Hardwick & Prosser	<a href="#">LPPO721</a>	6.0.2 Settele ment	Comment	It is noted that the draft documentation's settlement hierarchy states that in the main town, Kidderminster, suitable development includes utilisation of	Comments noted.

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		hierarchy		appropriate Greenfield and Brownfield sites and residential amongst other things. It is noted that the NPPF specifically excludes garden land from the definition of Brownfield and thus garden land is not considered previously undeveloped so is Greenfield.	
Kidderminster Harriers Football Club	<a href="#">LPPO931</a>	Table 6.0.2	Comment	To promote sporting opportunities in the district and improved health in accordance with NPPF. Suggests including an additional bullet to suitable development column for Kidderminster: <ul style="list-style-type: none"> <li>• <u>Sports and education facilities.</u></li> </ul>	Comment and suggestion noted.
Sir Thomas White's Charity	<a href="#">LPPO907</a>	Table 6.0.2	Support	Our client supports the settlement hierarchy described in Table 6.0.2 'Wyre Forest Settlement' Hierarchy of Policy 6B and the identification of Kidderminster as the 'Main Town' where development will primarily be directed. As Wyre Forest's largest settlement, Kidderminster is a sustainable location for growth and the recognition of this is supported.	Support is noted.
Hagley Parish Council	<a href="#">LPPO780</a>	Policy 6B Locating New Development	Object	Housing locations  The report undertaken By Peter Brett Associates for GBS LEP and others (for which WFDC was a client) concluded that Wyre Forest was not part of the Birmingham & Black Country Housing Market Area (HMA), which it identified. The Consultation Document correctly (in our view) identifies Wyre Forest District as coterminous with a HMA. Both these imply that WFDC should in its plan be making zero provision for housing	Objection noted. The Sustainability Appraisal Report and the Site Selection Process Topic Paper set out the site selection process that the Council has undertaken. The HELAA document also provides from evidence. These evidence base documents are available for viewing on the Council's website.



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				<p>for Birmingham commuters. Since such commuters (if by going by car) will inevitably use A456, this will prevent the new plan from exacerbating the traffic problems in Hagley described above.</p> <p>The Consultation Document concentrates housing sites on the east side of Kidderminster, without giving any (or at least any adequate) explanation for this. The implication that we draw from this is that Kidderminster is seeking to contribute to the alleged shortfall of housing land in Birmingham and (contrary to wider policy) increase commuting, which (if by car) will inevitably be along the congested section of A456, exacerbating the problems in Hagley and the pollution in the Hagley AQMA.</p> <p>The strategic gaps between Kidderminster and Bewdley and between Kidderminster and Stourport are narrow and should not be eroded, but the options of expanding Kidderminster northwest towards Low Habberley do not seem to have been considered. If the objective is to meet Kidderminster’s housing needs (rather than Birmingham’s), this option should have been considered. This area has good road links to Kidderminster town centre and scarps above Habberley Valley and a tributary of the Honey Brook would provide good landscape barriers to be a new edge to the Green Belt; that is if Green Belt release is</p>	

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				<p>necessary.</p> <p>As a Brownfield site, it is very difficult to oppose the redevelopment of Lea Castle Hospital. This site is very well shielded by coniferous plantations. The consultation suggests development between it and A451 Stourbridge Road. This may look attractive on the map, but in fact would be a severe encroachment on open countryside, and adversely affect the openness of the Green Belt.</p> <p>We note that the sites considered by WFDC include some among scattered housing in Broome parish. The housing in this area is properly to be considered as part of a scatter of housing focused on Hagley. We support the rejection of those sites. Housing in that area should not be considered unless the gap between Hagley and the Wyre Forest District boundary has been developed.</p> <p>We also note that two large employment sites have been suggested (and rejected) in the Hurcott and Hodgehill area on either side of A456, on the basis that they have a good transport link via A456. Their use, perhaps as a logistics site, would also exacerbate the traffic problems and pollution in West Hagley.</p>	
South Worcestershire	<a href="#">LPPO1245</a>	Settlement hierarchy	Support	The SWCs support the proposed settlement hierarchy which is logical and informed by appropriate sustainable development planning criteria.	Support and comments noted.

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Authorities		y			
Victoria Carpets	<a href="#">LPPO1500</a>	Settlement Hierarchy	Support	We support the settlement and the identification of Kidderminster as the 'Main Town' where development will primarily be directed. As Wyre Forest's largest settlement, Kidderminster is a sustainable location for growth and the recognition of this is supported.	Support is noted.
Stanmore Properties Ltd	<a href="#">LPPO1509</a>	Table 6.0.2 - Settlement Hierarchy	Support	The category, role and list of suitable development for Kidderminster as set out in <i>Table 6.0.2 Wyre Forest Settlement Hierarchy</i> is supported.	Support and comments noted.
	<a href="#">LPPO4562</a>	Settlement Hierarchy	Comment	Cookley is a Village <i>INSET</i> in Green Belt with its own strong identity/local services. WFDC should support Wolverley & Cookley PC to meet local needs in a sustainable way w/o destroying green belt and effectively joining Cookley to Kidderminster.	Comments noted.
	<a href="#">LPPO4563</a>	Settlement Hierarchy	Comment	Cookley is a Village <i>INSET</i> in Green Belt with its own strong identity/local services. WFDC should support Wolverley & Cookley PC to meet local needs in a sustainable way w/o destroying green belt and effectively joining Cookley to Kidderminster.	Comments noted.
Sport England	<a href="#">LPPO209</a>	Policy 6B - Locating New	Comment	The Council is nearing the completion of a Playing Pitch Strategy and any policy relating to new development should cross ref. to that document to ensure decisions regarding the release of existing playing field sites for	Comments noted.

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		Development		<p>alternative development or the provision of new playing field to support new development is properly informed and based on local evidence base to accord with NPPF Pars 73 and 74.</p> <p>A number of the proposed allocations do affect playing field sites therefore this is an important issue.</p>	
Horton Estates Ltd	<a href="#">LPPO849</a>	Policy 6B	Support	<p>Bullet point iii. of Sub-section A is supported for the same reasons set out in our response to Table 3.0.2. In addition, the view is taken that bullet point v. should be expanded to refer to the Local Plan's identification of specific PDL sites within the Green Belt (under draft Policy 34) where sustainable development will be permitted.</p> <p>The settlement hierarchy in Table 6.0.2 should also reflect that development at PDL sites in the Green Belt – both specific sites and windfall sites – is permitted by draft Policy 34. As it stands, the hierarchy appears to be in conflict with draft Policy 34 and it is therefore requested that "PDL sites in the Green Belt" is provided as a specific category in the hierarchy. A similar position exists with Sub-sections D and E which fail to acknowledge the development permitted on PDL in the Green Belt (within the countryside) under draft Policy 34.</p>	Support and comments noted.
Barratt Homes West Midlands	<a href="#">LPPO769</a>	Policy 6B	Comment	Support for aspirations of policy on locating new development but concerned that this is not reflected in	Comments noted.

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				<p>actual allocations.</p> <p>Number of proposed allocations are on employment sites - such site should only be allocated where there is clear market evidence to show sites will not come forward for employment uses.</p> <p>We support the recognition that it is necessary to facilitate the delivery of sufficient accessible housing to meet objectively assessed needs. We are concerned that the Kidderminster allocations in particular will result in a market saturation on the eastern edge of Kidderminster. Furthermore, housing should be distributed so that it reflects the settlement hierarchy.</p> <p>Accept that some Green Belt land release will be required. However, suitable and sustainable Greenfield sites outside Green Belt should be allocated first in order to pass 'exceptional circumstances' test.</p>	
Homes England	<a href="#">LPPO797</a>	Policy 6B	Support	Policy states that the development strategy and site allocations proposed for locating new development are based on a number of principles. These include the re-use of available, accessible and environmentally acceptable Brownfield land. The HCA supports this, as the proposed allocation of the former Lea Castle Hospital site as a core housing site for 600 dwellings as part of a mixed use development is an appropriate use of the site, regenerating a redundant Brownfield site	Support and comments noted.

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				<p>on the edge of Kidderminster and bringing it back into use.</p> <p>Another principle is the maintenance and openness of the Green Belt following the Green Belt Review. This is an important principle, and highlights the need for the Council to carefully consider the scale of Green Belt releases that will be required in order to meet the OAN over the plan period.</p> <p>The principle that Kidderminster is to be the main focus for large-scale housing development is supported.</p>	
	<a href="#">LPPO4556</a>	Settlement Hierarchy	Comment	Cookley is a Village <i>INSET</i> in Green Belt with its own strong identity/local services. WFDC should support Wolverley & Cookley PC to meet local needs in a sustainable way w/o destroying green belt and effectively joining Cookley to Kidderminster.	Comments noted.
	<a href="#">LPPO4574</a>	Settlement Hierarchy	Comment	Cookley is a Village <i>INSET</i> in Green Belt with its own strong identity/local services. WFDC should support Wolverley & Cookley PC to meet local needs in a sustainable way w/o destroying green belt and effectively joining Cookley to Kidderminster.	Comments noted.
Horton Estates Ltd	<a href="#">LPPO851</a>	Table 6.0.3 and 6.0.5	Comment	Table 6.0.3 appears to provide a breakdown of what the District Council deems to be completed or committed housing supply. However, it includes lapsed planning permissions which is unsound because they	Comments noted.

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				no longer benefit from planning permission and do not amount to deliverable/developable supply. It is requested that this component be deleted from Table 6.0.3. In addition, we wish to highlight that PDL could be released at Cursley Distribution Park through site rationalisation which could be allocated for residential development. As described in more detail above, two areas of land could potentially be released (1.5ha and 1.9ha), each of which could accommodate in the order of 40 dwellings.	
Sir Thomas White's Charity	<a href="#">LPPO913</a>	Table 6.0.3	Comment	Table 6.0.3 within the Key Choice for the Development Strategy states that the Council have identified 3,640 dwellings (approximately) which could be achieved to meet the requirement. The complete figure from 2016/17 (the first year of the plan) are yet to be confirmed; however these are not going to plug the gap between the proposed allocations and the requirement. This leaves a significant shortfall which requires the Council to release additional strategic land. The plan includes no reference to a Part 2 Plan or a review mechanism. In this context the plan must identify additional strategic sites for housing now if it is to be found sound. Land to the north west of Kidderminster (a site location plan for which is enclosed) could contribute towards the Council's requirements for additional strategic land and could boost the supply of dwellings required within the	<p>The OAHN follows the guidance for determining housing needs as laid out in guidance available at the time and will be updated to reflect changes in the NPPF and PPG.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.</p>

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				<p>region, which would assist in addressing the shortfall.</p> <p>Beyond the issue of identifying insufficient land to meet its housing need, it should also include additional sites to provide flexibility with respect to the Council’s housing needs and consequently the allocation of sites. At present the Council’s supply relies on a significant amount of previously developed land, which is likely to have constraints in terms of contamination and accessibility. Furthermore, the Council has only ever achieved an annual supply in excess of 300 dwellings in two previous years (2013/2014 and 2014/2015), and predicted for 2016/2017 (although this is still to be confirmed). If the Council is to consistently exceed 300 dwellings going forwards, as well as allocating sufficient sites to meet the basic requirement (which it does not currently do), additional flexibility in the supply will assist further. Consequently the Council should include additional flexibility of at least 10% above the minimum requirement of 5,400 units when allocating sites which are appropriate for addressing the Council’s shortfall. This equates to 540 additional dwellings.</p>	
CORE11	<a href="#">LPPO239</a>	6.0.3	Support	Support for table 6.0.3.	Support is noted.
CORE11	<a href="#">LPPO240</a>	6.0.4	Comment	Option 4 strongly recommended, The development fabric will be of prime importance.	Comments noted.
	<a href="#">LPPO4598</a>	6.0.4	Comment	We would say that the wording on the proposals is	Comments noted.



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				confusing. One would assume that the 'Core proposal' would be the favoured one, when in fact this is not the case. Such proposals should be made very clear and concise so that the general public are in no doubt about what is being proposed.	
Wyre Forest Green Party	<a href="#">LPPO1486</a>	Brownfield Sites	Comment	According to the statistics on page 39 of the Local Plan Review, there is a total of 967 dwellings completed or with planning permission granted on Brownfield sites, with a further 1,193 proposed by the plan on other Brownfield sites. 350 dwellings are also proposed on Greenfield sites not in the Green Belt and 796 dwellings can be placed on previously built Green Belt land including 600 of these at Lea Castle. This makes a total of 3,306 dwellings. This exceeds the number of houses needed for the 15 year land supply (when using the SNPP figures of 199 p.a. as detailed in 1c above) without the need to use Green Belt at all.	Comments noted. Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
	<a href="#">LPPO483</a>	Table 6.0.5	Object	Do not believe that we need to allow land for 6,000 properties therefore as I object to both Option A and Option B there is no need to use any percentage of greenbelt land.	Objection and comments noted. The proposed development requirement is based on the housing need for the District. This housing need was evidenced in the OAHN study published in April 2017.  Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will

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					use the Government's new standardised methodology.
Education & Skills Funding Agency	<a href="#">LPPO1047</a>	Table 6.0.5	Comment	Under Education Act 2011 and Academies Act 2010, all new state schools are now academies/free schools and ESFA is delivery body for many of these rather than local authorities. The planned housing target of 6000 homes will place some additional pressure on education facilities. The Local Plan must be 'positively prepared' to meet these requirements.	Comments noted.  Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.
Education & Skills Funding Agency	<a href="#">LPPO1058</a>	Table 6.0.5	Comment	In terms of the two development options (Table 6.0.5: Key Data, page 39) presented, the ESFA does not favour one option over the other, however, we are keen to ensure that regardless of the split between non green belt and green belt land there is sufficient land safeguarded for new schools to meet the need generated by the proposed allocations.	Comments noted.
	<a href="#">LPPO5108</a>	Table 6.0.5	Object	Whilst it is difficult to reconcile the data in Table 6.0.5 with the allocations outlined in Policy 30 and Policy 31, Table 6.0.5 indicates that 2956 new dwellings can be built on Brownfield sites and on the Lea Castle site without releasing more land from the Green Belt. On that basis, and using the figures from the same table, the balance of 626 dwellings can be built under Option B "additional dwellings on Greenfield sites not in Green Belt" category or, in the worst case, by allocating a	Objection and comments noted. The proposed development requirement is based on the housing need for the District. This housing need was evidenced in the OAHN study published in April 2017.  Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating

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				small part of the “number of dwellings proposed on Greenfield Green Belt sites” category. There is clearly neither a requirement to develop the Green Belt Fields abutting the Spennells Estate, for which an allocation of 930 dwellings, under site references OC/13S. WFR/ST/2 and AS/10 has been proposed. nor a requirement to develop the core area in Option A to the East of Kidderminster.	housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.
	<a href="#">LPPO4499</a>	Table 6.06	Object	This table is unfairly portrayed. All facts concerning option A are portrayed in a positive manner whereas facts concerning option B are negative. For example, Option A is shown to enable ‘the building of Kidderminster Eastern Relief Road’ whereas Option B ‘Would <b>not enable</b> building of Kidderminster Eastern Relief Road and the benefits this scheme allows’. It is obvious this table has been designed to advocate option A and confuse the less-educated population. I believe this is a key reason why this proposal should be completely reconsidered and presented in a fair manner.	Objection and comments noted.
Bromsgrove & Redditch DC	<a href="#">LPPO901</a>	Table 6.0.6 Infrastructure Roads	Object	Council has concerns re transport evidence required to support these allocations. Concerned that preference is being sought for a preferred option without any modelling being done and a transport background paper being available. Table 6.0.6 sets out infrastructure requirements for both core sites and options A and B, together with a comparison of impacts on the highways network. It is not clear what	Objection and comments noted. The Transport evidence base study will be made available at the Pre-Submission consultation stage. WFDC will continue to engage with Bromsgrove and Redditch Council’s in Duty to Co-operate discussions.

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				<p>these schemes entail, when and how they will be delivered and what impact they will have. Option A appears to offer an eastern relief road which could ease congestion and improve air quality within Kidderminster town centre. But there is no mention of what impact this might have outside of Wyre Forest. Either option would be likely to have a significant impact on Bromsgrove's infrastructure. We are especially concerned about the impact on the A456 through Hagley and beyond. Also the A448 route to Bromsgrove and Redditch. Both routes would be used to access the motorway. There are already AQMAs at these locations. What impact would there be on country lanes which may be used as rat runs?</p> <p>The Council hoped that transport evidence would have been made available to influence the Preferred Option and not at a later stage in order to justify the chosen option going forward. This issue has already been raised in response to IDP. We would like to engage further with WFDC and WCC to develop a wider transport strategy for North Worcestershire. This would then allow the area to continue to grow and thrive in a coordinated and sustainable way.</p>	
Worcestershire County Council, Planning	<a href="#">LPPO1138</a>	Table 6.0.6	Comment	In Table 6.0.6 the housing row states that "Large scale site releases more likely to enable viable provision of affordable housing". However, there is considerably evidence to the contrary, both in Worcestershire and	Comments noted. We welcome the opportunity to work with Worcestershire County Council and the Green Infrastructure Partnership as the plan evolves.

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Economy & Performance				<p>nationally. The accompanying variability assessment indicates that small scale green field developments of between 30 and 75 homes are the most viable.</p> <p>This may be too broad a statement, as the viability of affordable housing will depend on a range of factors, not least of which is location, as well as the scale of the development. Pockets of growth consisting of small-scale development will support existing infrastructure, but large-scale development will have a wider and more far-reaching impact on, for example, school places.</p> <p>Infrastructure and roads: this line of the table appears to present the Kidderminster Eastern Relief Road as desirable in its own right which is contrary to discussions. The potential need for the relief road arises from the planned development to the east of Kidderminster. As the quantum of development is greater in option A it is the working assumption that this will be more supportive of the need for the road than option B, but we would also stress that no transport modelling has as yet taken place as we will undertake this once a development option has been chosen. Modelling will confirm (or not) the need for the road.</p> <p>The results of the modelling notwithstanding, there are also concerns over the route of the relief road and the</p>	

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				<p>potential impact that this would have on protected sites in the district, including both SSSI's and Local Wildlife Sites in particular direct and indirect (notably severance) effects on Hurcott &amp; Podmore Pools SSSI and Local Wildlife Sites, Captain's &amp; Stanklyn Pools and Spennels Valley Local Wildlife Sites and Hoo &amp; Barnett Brook Local Wildlife Sites. A complex of designated sites of nature conservation significance form biodiverse corridors which radiate into the open countryside from the peri-urban eastern fringes of Kidderminster. The Eastern Relief Road must address these effects in a manner which demonstrates net-gain for biodiversity; the quanta of mitigation will become a significant burden on the surrounding allocations. This is likely to far outweigh any opportunities for de-fragmentation/habitat creation or restoration which this new linear infrastructure might pose.</p> <p>We would welcome further opportunity to discuss these issues with WFDC following completion of the transport modelling and its conclusions.</p> <p>In the same table, the row for 'Green Infrastructure and Biodiversity' states that "The more dispersed nature of this approach will mean that more sites are affected. This, in combination with their typically smaller size (with the exception of the enlarged Lea Castle) will mean the delivery of Green Infrastructure</p>	

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				<p>requirements is more difficult".</p> <p>We have some concerns about these comments about green infrastructure, and have impacts both locally and in combination on corridors. The Worcestershire Green Infrastructure partnership undertook an assessment of the site proposals at a high level, including some mitigation options in early 2017, and we would refer back to this document in assessing the green infrastructure impact of options A and B. We welcome the opportunity to work further with WFDC on green infrastructure.</p>	
	<a href="#">LPPO484</a>	Table 6.0.6	Comment	I do not believe we need Option A or Option B.	Comment noted.
CORE11	<a href="#">LPPO241</a>	6.0.6	Comment	Option B is the overall better choice, with more attention to green infrastructure, less large housing areas, a better place to live and quality of life, these factors should not be sacrificed to saving of cost if more dense developments are decided upon.	Commented noted.
Summerfield Against Land Transformation	<a href="#">LPPO1611</a>	Table 6.06	Object	There is <u>clear bias</u> contained within the draft Local Plan, to the extent that Option A is portrayed as the only real choice and Option B as, effectively, ballast and barely viable. This is further depicted in the "vision" (simply a point of view) and as "strategic" (a high-level choice which supports <i>your</i> point of view). This is unacceptable.	Objection and comments noted.

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				<p>There is further bias in relation to the Eastern Relief Road. The dominant argument for Option A appears to revolve around both ‘critical mass’ and thus the need for a relief road, together with its capacity to provide solutions to existing congestion, poor air quality and problematic transportation links. Indeed, so heavily do you rely upon the relief road that it becomes the justification for rather than a consequence of Option A.</p> <p>Option A is shaped to justify the relief road, resolve pre-existing transport problems and attract capital funding.</p>	
Historic England	<a href="#">LPP01269</a>	Table 6.0.6	Comment	With reference to tables beginning on page 41, our specific interest is in how the harm/ impact to the historic environment has been assessed, in the decision of which option is the most appropriate for the Local Authority. This includes whether to release land from the Green Belt and also for all of the proposed site allocations contained later in the document.	The Historic Environment evidence base study includes details of the analysis of the proposed site allocations and land to be released from the Green Belt. This study will be made available on the Council's website during the pre-submission consultation.
Wyre Forest Friends of the Earth	<a href="#">LPP01313</a>	6.0.6 Road Infrastructure	Comment	The construction of the Eastern Bypass could encourage more car journeys to be undertaken. Locally generated traffic on the eastern side of Kidderminster could use the bypass as a shortcut between areas. This could lead to increased pollution including emission of CCGs, more road casualties, a reduction in walking and	Comments noted.



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				cycling and a consequent rise in obesity and associated health conditions.	
Barratt Homes West Midlands	<a href="#">LPPO768</a>	Table 6.0.6	Object	Option B requires less Green Belt release but still meets the housing requirement. Do not consider that exceptional circumstances have been demonstrated to justify this Green Belt release during site selection process.	Objection and comments noted.
	<a href="#">LPPO4695</a>	Table 6.0.3	Object	<p><b>Inconsistencies in Local Plan document</b></p> <p>A further reason for objecting the proposals for sites allocated for housing relates to the inconsistencies / lack of clarity over the housing number projections reported in the Local Plan document.</p> <p>Table 6.0.3 in the Local Plan reports that 3,640 houses can be accommodated on “core or common to both potential approaches [options]”. This replicated in Table 3. The Local Plan then concludes that they will assume a provisional requirement of 6,000 dwellings, which results in a shortfall of 2,360 houses. However, assuming 6,000 houses is a further 11% uplift which is in addition to the 58% uplift that has applied to the base population projections. The total uplift from the base population projections is therefore 75% (2,580, 143 per annum). This uplift has again not been justified by WFDC or Amion Consulting.</p> <p>In addition, it would be sensible to assume that the</p>	<p>Comments noted. The proposed development requirement is based on the housing need for the District. This housing need was evidenced in the OAHN study published in April 2017.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 6: A SUSTAINABLE FUTURE –  
 DEVELOPMENT STRATEGY (excluding paragraphs 6.54-6.57)**

Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response																
				<p>total core housing numbers identified in proceeding sections under headings for each area (e.g. Kidderminster Urban Extension) would equate to the 3,640 houses outlined in Table 6.0.3. However, Table 4 shows the full list of “core” housing sites, which totals 4,486 houses and 40.94 hectares of employment land. Once again, this demonstrates the lack of clarity over the source of housing numbers and reinforces the fact that the Local Plan and supporting OAHN are not suitable for public consultation.</p> <p><b>Table 3 Core / “common” housing numbers (adapted from Table 6.0.3)</b></p> <table data-bbox="792 842 1473 1276"> <thead> <tr> <th data-bbox="792 842 1400 874"><b>Type of site</b></th> <th data-bbox="1400 842 1473 874"><b>No. o</b></th> </tr> </thead> <tbody> <tr> <td data-bbox="792 874 1400 946">Dwellings completed from 1 April 2016 (as of April 2017)</td> <td data-bbox="1400 874 1473 946">225</td> </tr> <tr> <td data-bbox="792 946 1400 978">Existing and lapsed planning permissions</td> <td data-bbox="1400 946 1473 978">712</td> </tr> <tr> <td data-bbox="792 978 1400 1010">Previously developed land (not in Green Belt)</td> <td data-bbox="1400 978 1473 1010">1,193</td> </tr> <tr> <td data-bbox="792 1010 1400 1090">Previously developed land in Green Belt (including 796 Lea Castle)</td> <td data-bbox="1400 1010 1473 1090">796</td> </tr> <tr> <td data-bbox="792 1090 1400 1121"><b>Sub-total</b></td> <td data-bbox="1400 1090 1473 1121"><b>2,956</b></td> </tr> <tr> <td data-bbox="792 1161 1400 1225">Potential from suitable Greenfield and small scale Green Belt release (primarily for local need)</td> <td data-bbox="1400 1161 1473 1225">684</td> </tr> <tr> <td data-bbox="792 1225 1400 1257"><b>Total</b></td> <td data-bbox="1400 1225 1473 1257"><b>3,640</b></td> </tr> </tbody> </table>	<b>Type of site</b>	<b>No. o</b>	Dwellings completed from 1 April 2016 (as of April 2017)	225	Existing and lapsed planning permissions	712	Previously developed land (not in Green Belt)	1,193	Previously developed land in Green Belt (including 796 Lea Castle)	796	<b>Sub-total</b>	<b>2,956</b>	Potential from suitable Greenfield and small scale Green Belt release (primarily for local need)	684	<b>Total</b>	<b>3,640</b>	
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**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY (excluding paragraphs 6.54-6.57)**

Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response				Officer Response - WFDC	Officer Response
			Urban	WFR/WC/15	600	1.89		Y	
			Extension						
			Urban	BW/4	200	0		N	
			Extension						
			Urban	WFR/CB/7,	1735	9.66		Y	
			Extension	OC/4/5/6/12/13N, WFR/ST/1,FPH/27					
			Stourport	LI/2	80	0		Y	
			Stourport	LI/6/7	94	0		Y	
			Stourport	AKR/1	17	0		N	
			Stourport	AKR/2	72	0.34		N	
			Stourport	AKR/7	20	0		N	
			Stourport	AKR/20	170	0		N	
			Stourport	MI/1	40	0		N	
			Stourport	MI/34	114	0		N	
			Stourport	MI/5	55	0		N	
			Stourport	MI/6	106	0		N	
			Stourport	MI/33	0	0.34		N	
			Bewdley	WA/BE/1	100	0		Y	
			Bewdley	WA/BE/5	45	0		Y	
			Bewdley	BR/BE/6	30	0		N	
			Villages	WA/UA/4	10	0		Y	
			Villages	BR/RO/1	30	0		N	
			Villages	BR/RO/4/6	20	0		N	

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				<p>Further to this, it is not clear how Table 6.0.3 (replicated in Table 3 above) in the Local Plan relates to Table 6.0.5 (replicated in Table 5, overleaf) or how the numbers relate to Option A and B. WFDC need to clarify how these numbers relate to the core/common sites and the information presented in Table 6.0.3 of the Local Plan. For instance, the 1,193 additional dwellings to be placed on Brownfield land which are additional proposed by the plan, where are these in relation to Table 6.0.3? Even if the mathematics behind the numbers is correct (which is doubtful), the presentation of the information is illogical and uninformative.</p> <p><b>Table 5 Core / “common” housing numbers (adapted from Table 6.0.5)</b></p> <table border="0"> <tr> <td><b>Number of dwellings required 2016 - 2034</b></td> <td><b>6,000</b></td> </tr> <tr> <td>Number of dwellings to be placed on brownfield land</td> <td>967 (a perm propd</td> </tr> <tr> <td>Number of dwellings on previously development</td> <td>796</td> </tr> </table>	<b>Number of dwellings required 2016 - 2034</b>	<b>6,000</b>	Number of dwellings to be placed on brownfield land	967 (a perm propd	Number of dwellings on previously development	796																										
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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				<p>land in the Green Belt (included 600 at Lea Castle) Number of dwellings proposed on greenfield sites 350 not in Green Belt Number of dwellings proposed on greenfield 1,918 Green Belt sites <b>Sub-total 5,224</b> Option A – Additional Green Belt dwellings 1,080 Option B – Additional Green Belt dwellings 765 Option B – Additional dwellings on Greenfields 570 sites not in Green Belt <b>Total Option A = 6,304</b>  <b>Option B = 6,559</b></p> <p>Further concerns relating to the mathematics informing the Local Plan are strengthened by the inability of WFDC to calculate percentages. Table 6.0.6 of the Local Plan states that Option A would take 266 gross hectares of Green Belt land, which is the equivalent of 2.4% of the overall Green Belt land area. Option B is reported to take 218 gross hectares of Green Belt land area, equating to 1.9% of the overall Green Belt land area. Assuming that the document refers to the same “overall Green Belt area”, 218 hectares (Option A) cannot equal 1.9% at the same time as 266 hectares equals 2.4%. Table 6 demonstrates the correct scenarios for if Option A and Option B scenarios were considered as correct. The result show that there is between a 7-hectare reduction and 9-hectare increase</p>	

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response										
				<p>between the two scenarios, which whilst this is a small proportion of the projected land take for each option, it is incorrect and demonstrates that a comprehensive technical review of the Local Plan has not been completed.</p> <p><b>Table 5 Core / “common” housing numbers (adapted from Table 6.0.5)</b></p> <table border="0" data-bbox="792 660 1473 1165"> <thead> <tr> <th data-bbox="792 660 1227 687">Scenario</th> <th data-bbox="1227 660 1473 687">Option</th> </tr> </thead> <tbody> <tr> <td data-bbox="792 687 1227 730">Local Plan assessment</td> <td data-bbox="1227 687 1473 730">Option A</td> </tr> <tr> <td data-bbox="792 730 1227 948">Assume Option A is correct</td> <td data-bbox="1227 730 1473 948">Option B Option A (as per Local Plan) Option B</td> </tr> <tr> <td data-bbox="792 948 1227 1054">Assume Option B is correct</td> <td data-bbox="1227 948 1473 1054">recalculated Option A</td> </tr> <tr> <td></td> <td data-bbox="1227 1054 1473 1165">recalculated Option B (as per Local Plan)</td> </tr> </tbody> </table> <p><b>5. Status of the Housing White Paper (February 2017)</b></p> <p>The Local Plan states that:</p> <p><i>“at the time of preparation of this preferred option</i></p>	Scenario	Option	Local Plan assessment	Option A	Assume Option A is correct	Option B Option A (as per Local Plan) Option B	Assume Option B is correct	recalculated Option A		recalculated Option B (as per Local Plan)	
Scenario	Option														
Local Plan assessment	Option A														
Assume Option A is correct	Option B Option A (as per Local Plan) Option B														
Assume Option B is correct	recalculated Option A														
	recalculated Option B (as per Local Plan)														

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Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				<p><i>document the Government’s new Housing White paper was being published along with the underpinning documentation that accompanied it. The Council’s intention has been to try to anticipate as much as is possible of the Government’s strategy so that a Plan consistent with the requirements of the NPPF and emerging national policy has been brought forward for consultation. As such, through this Preferred Options, Wyre Forecast District Council has strived to propose a realistic level of housing requirement that respects the findings of the Local Plans Expert Group”</i></p> <p>The Housing White Paper states that:</p> <p><i>“we need to plan for the right homes in the right places... but at the moment, some local authorities can duck potentially difficult decisions, because they are free to come up with their own methodology for calculating objectively assessed need. So, we are going to consult on a new standard methodology for calculating objectively assessed need and encourage councils to plan on this basis”.</i></p> <p>The Paper also states:</p> <p><i>“Plan-making remains slow... with arguments about the number of homes to be planned for often being a particular cause of delay – something not helped by the lack of a standard methodology for assessing housing</i></p>	



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				<p><i>requirements. We want to ensure that every are has an effective, up-to-date plan, by making it easier for plans to be produced and understood and simpler to identify the homes that are required”.</i></p> <p>In relation to timescales for the methodology, the document states:</p> <p><i>“we will publish this consultation at the earliest opportunity this year [2017], with the outcome reflected in changes to the National Planning Policy Framework”.</i></p> <p>Given the timescales in which the Local Plan is being developed and the lack of transparency /robustness in relation to the OAHN report, it would be sensible for WFDC to await the objective methodology. This way WFDC could ensure they have used a methodology that justifies the substantial uplift from baseline population growth is actually realistic and the Local Plan will not pose risk to large expanses of Green Belt land unnecessarily.</p>	
	<a href="#">LPPO4809</a>	Option B Stourport	Comment	A statement is made in the Preferred Options Document (table 6.0.6 option B) states that additional development to the west of the river at Areley Kings is likely to have a negative impact on Stourport and the river crossing. The development proposed is only about 20% of the existing Areley Kings settlement	Comments noted. A Stourport relief road is not being proposed; nor is a new bridge over the River Severn. Both of these would be very expensive and is not supported by the Worcestershire Local Transport Plan No. 4.

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				(compared to 100% for Spennells) and the document fails to mention that the WFDC Infrastructure Delivery Plan (2012) proposes the Stourport relief road, with a new bridge over the River Severn.	
	<a href="#">LPPO4619</a>	Development Strategy	Object	Overall, the proposals reflect a lack of awareness of the need for infrastructure to support new housing developments, and a lack of creativity in considering how best to utilise available land.	Objection noted.
Yew Tree Walk Ltd	<a href="#">LPPO818</a>	Location of new development	Comment	Stourport-on-Severn is identified as a large market town, the second largest settlement in the District. With Kidderminster as the main town in the District, both settlements should therefore be the primary focus for future housing development. In this context, rather than an either-or choice between 'Option A' and 'Option B', the housing distribution options being suggested through the Preferred Options, it would be more appropriate to seek to concentrate growth through major urban extensions at Kidderminster but also to seek some dispersed growth particularly focussing on Stourport-on-Severn given its role to support Kidderminster in the provision of larger scale housing. There is scope to increase the numbers allocated at Stourport-on-Severn, reducing the reliance of smaller, less sustainable and particularly rural settlements, in delivering the housing requirement. On this basis, further sustainably located sites on the edge of Stourport-on-Severn, should be identified which should include additional Green Belt	Comments noted.

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO SECTION 6: A SUSTAINABLE FUTURE – DEVELOPMENT STRATEGY (excluding paragraphs 6.54-6.57)**

Company / Organisation	Response Number	Para /Policy	Type of Response	Summary of Response	Officer Response - WFDC Officer Response
				release.	
Barratt Homes West Midlands	<a href="#">LPPO767</a>	Chapter 6	Object	Development should be allocated based on sustainability and suitability of sites. Kidderminster has a disproportionate amount of dwellings allocated under Option A. Stourport has 20% of population but under 14% of allocations under Option A. This should be higher.	Objection and comments noted.
Barratt Homes West Midlands	<a href="#">LPPO766</a>	para. 6.48	Object	Emerging Plan places great emphasis on Brownfield urban sites (most are existing allocations) and potential large urban extensions (tend to have long lead-in times). Urban extension will need planning applications submitting shortly after adoption of Plan and have very strong delivery rates. We propose that a buffer should be added to OAHN to ensure choice and competition.	Objection and comments noted.
Barratt Homes West Midlands	<a href="#">LPPO772</a>	Table 6.0.6	Object	Both options result in Green Belt release but no reference made to NPPF guidance and exceptional circumstances test. If there is a suitable and sustainable strategy for development that would protect the Green Belt then exceptional circumstances test cannot be passed. Where is this evidence to support Green Belt release? The 2 options have limited relationship to the status of the principal settlements. Under Option A, 85% of development goes to Kidderminster, 13.8% to Stourport and 3.1% to Bewdley. Kidderminster has 56% of population and Stourport 20%. Agree that Kidderminster should be focus for growth but other settlements should be	Comments noted. Further evidence base work has been undertaken at pre-submission stage which will address some of these issues raised.

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				<p>allocated growth proportionate to their size. Stourport has advantage of only partly being in the Green Belt unlike Kidderminster.</p> <p>Table 6.06:</p> <p>Spatial Strategy - option A relies on significant amount of Green Belt development to east of Kidderminster. Option B also includes Green Belt allocation east of Lea Castle Hospital. These sites are all in same area and would compete against each other leading to likely market saturation. Where is evidence that this quantum of development is deliverable in Plan period? Additional allocations elsewhere such as Stourport would provide greater choice.</p> <p>Green Belt - no reference to exceptional circumstances test made - fundamental failing</p> <p>Housing - suggested that Option B will result in smaller sites that will be less viable and therefore provide less affordable housing. However, all sites are above threshold and should deliver affordable housing. Several Option A sites have significant infrastructure requirements which could affect viability of affordable housing provision. No evidence to support statements made in table.</p> <p>Employment - Option B results in an employment site</p>	

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				<p>being reallocated for housing. Option B housing numbers are higher than Option A so remove this site. it is suggested that Option B would mean reduced accessibility to employment sites due to more dispersed pattern of development. We do not agree. All employment allocations under Option B come from core sites.</p> <p>Roads - all allocations should be able to provide sufficient infrastructure to offset their impact.</p> <p>Education - implications for education provision between the 2 options should be minimal. Little evidence that option B will be more problematic for education provision.</p> <p>Green Infrastructure and Biodiversity - suggestion that option B would make green infrastructure harder to deliver. Where is evidence? Smallest allocation under Option B in main settlement is 72 units. Should be capable of providing GI.</p> <p>Sustainability - considerations identified in table are inappropriate. Little evidence to support statements made. Is not fair to describe option B as dispersed strategy as most development will be delivered in most sustainable settlement. It is suggested in Option B that considerable additional pressure will be placed on services and transport and cannot be mitigated. Where</p>	

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				<p>is evidence?</p> <p>Evidence in Preferred Options is insufficient to inform 3rd approach in issues and options document.</p>	
	<a href="#">LPPO2416</a>	Section 6	Object	<p>There is reference in Section 6 to additional school places that would be required as a consequence of increased housing. I would expect that: any increase in FTE pupils would be accompanied by appropriate increases in school facilities eg hall, space, play space, dining facilities, toilets, as well as additional classrooms; no school should be increased by a fraction of a class unless this rounds an existing fraction up to a whole number. The plan should also reflect the lack of certainty of securing any new school provision via the Free School route, and provide funded alternatives.</p>	<p>Comments noted. WFDC will continue to work with WCC children’s services to establish future need for school places through the plan development lifetime.</p>
	<a href="#">LPPO2191</a>	Development Strategy	Comment	<p>There should be a wider spectrum of development to meet housing needs for all sectors and demographics.</p> <p>Brownfield sites are not always suitable for sustainable communities in the long term. Town centre sites often lack amenity.</p> <p>I concur with the findings of the consultation that there has been a lack of development in Bewdley to</p>	<p>Comments noted. The emerging Local Plan is proposing to allocate some housing sites in Bewdley.</p>

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				<p>meet local requirements.</p> <ul style="list-style-type: none"> <li>• Bewdley needs to support people who have been brought up in the locality and wish to remain.</li> <li>• There is a need to attract additional residents to support and contribute towards the local WFDC economy. The provision of suitable family housing to attract such residents needs to be increased and diversified.</li> <li>• There is also the question of elderly residents who wish to remain in Bewdley. Provision of suitable units for over 55s and possibly a complex for residential and nursing home is also a consideration.</li> </ul>	
	<a href="#">LPPO4597</a>	Employment Needs	Comment	Industrial units continue to be built, why is this necessary, when throughout the District you can see units that have been empty for a considerable time, Easter Park is an example.	The Local Plan Review process doesn't just allocate sites for housing; it also allocates potential sites for employment to meet its employment land requirement. The Employment Land Review evidence base study sets out what the employment requirement is for the district during the plan period. This evidence base study is used to inform the site allocations in the emerging Local Plan for employment use.
	<a href="#">LPPO3966</a>	Development	Comment	I will not labour the many valid points made about the loss of natural habitat implicit on any building on green	Comments noted.

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		Strategy		<p>belt or the inevitability of develops building the largest, most profitable houses they can which will inevitably attract commuters and lead to increased congestion, pollution and increased demand on local services which have so commendably been made by other contributors</p> <p>But crucially the document simple ignores the opportunity of empty buildings in the town centre. Believes that Council officials admit that recent large-scale retail developments have sucked economic activity out of the town centre leading to huge under occupancy but a blind eye has been turned by the council to these buildings due to the difficulty in getting landlords to repurpose these buildings into small residential units. Yet it must be obvious to all in authority that the centre of town is exactly where young people and mature people wish to relocate to be close to amenities. So, a council who would use their statutory powers including compulsory purchase orders has a ready stock of housing which could be ready for market in a maximum of 18 months. Further these homes would be close to public transport hubs, new health centre, hospital. The former glades site could easily have a school built on it, next to council operated pay car park rather than a cinema complex that will pull in car parking using customers for much smaller periods.</p>	



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				<p>As for plans to entice economic activity to the area, it is clear on only a cursory glance than no one who was asked to formulate these plans has the slightest idea about how businesses run, the keys are readily available local skilled workforce, good transport links and or local supply chain. Sadly, in the foreseeable future Kidderminster and environs will not be able to supply these which is why it is haemorrhaging industrial jobs.</p> <p>Too conclude once again this plan like the plan for a new council house, leisure centre and car park and road network, repaved public realm, retail developments, town gateways is ill thought out ill-conceived and totally misses the targets it aims to hit, attract younger people, allow older people who have spending power to downsize and stay in the area. Building executive houses for commuters and depriving the existing community of one its major areas to take exercise, breathe clean unpolluted air and de-stress from the pressures of modern life can only be described as a folly.</p>	
	<a href="#">LPP01597</a>	Development Strategy	Comment	We accept the need for new housing development within Wyre Forest District, but have major concerns regarding the amount of development proposed concentrated to eastern Kidderminster, including the use of prime agricultural Category 2 and 3 land. It is averred this would not be sustainable development.	Comments noted. The Sustainability Appraisal Report and the Site Selection Process Topic Paper set out the site selection process that the Council has undertaken. The HELAA document also provides from evidence. These evidence base documents are available for

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				<p>We also believe that the WFDC Local Plan could better support the community through intelligent and sustainable regeneration of key areas of Kidderminster, Stourport and Bewdley. As shown in this Objection, it is not considered sufficient investigation has been made of Brownfield sites throughout the District. If the modifications to the Local Plan proposed were spread more evenly around the District, it would minimise the adverse impact on Green Belt, areas of SSI and reduce the urban sprawl of eastern Kidderminster.</p>	viewing on the Council’s website.
Taylor Wimpey West Midlands	<a href="#">LPPO1483</a>	6 A Sustainable Future - Development Strategy	Comment	<p>Development Strategy - Buffer</p> <p>The Preferred Options identifies land to accommodate 6,000 dwellings to deliver the housing requirement of 5,400 homes, a 7.4% buffer. Recent advice of the Local Plan Expert Group suggested a buffer of 20%, therefore need to identify additional land equivalent to accommodating 1,080 additional dwellings. Therefore, in total, the Local Plan should be providing enough land equivalent to the delivery of a total of 6,480 dwellings over the plan period in Wyre Forest District.</p>	<p>Comments noted. The proposed development requirement is based on the housing need for the District. This housing need was evidenced in the OAHN study published in April 2017.</p> <p>Since the Preferred Options document was consulted on, the Government have published their Standardised Methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government’s new standardised methodology.</p>
	<a href="#">LPPO1942</a>	Development	Comment	If all these new houses are built where will the occupants work? Is it not more sensible to plough	There is a legal requirement for the Council to provide for its employment need as well as its

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		Strategy		money into promoting growth of new industry, then build housing at the same time as industry grows? Quality of life is important to attract business and workers to the area so the beauty of the Green Belt and the wildlife it supports is crucial to our town.	housing need. To make a place sustainable it needs employment as well as housing. By creating employment opportunities it enables people to live and work within the district. Please see the Employment Land Review for further details.
Stanmore Properties Ltd	<a href="#">LPPO1510</a>	Section 6	Comment	A focus on Kidderminster accords with the summary of Issues and Options representations which states support for a sustainable urban extension to the north of Kidderminster based on the Lea Castle Hospital (Option 2) and the Hurcott Lane ADR. Concern in respect of traffic may be addressed by the recent completion of the Hoobrook Road link and impact on the Hurcott pastures SSSI is considered further in our other responses. Representations also indicated little enthusiasm for allocating development in the rural east or west of the District (Options 6 and 7) and in respect of the west the relative isolation and poor sustainability make the location difficult for development over and above that to meet local needs.	Comments noted.
South Worcestershire Authorities	<a href="#">LPPO1242</a>	Development Strategy	Comment	The consultation paper sets out a level of growth that the level of housing growth proposed ' <i>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</i> '. However, it is not clear how the additional growth addresses unmet need	Comments noted. We continue to have Duty to Cooperate discussions with our neighbouring Local Authorities, which has included discussions with the Black Country Local Authorities, South Staffs, and Birmingham City Council.

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				arising from outside of Wyre Forest District. It should also be recognised that whilst work is still underway to establish how the Birmingham shortfall will be distributed, there could be a need for the Wyre Forest Local Plan Review to consider higher levels of growth to absorb some of this need.	
Historic England	<a href="#">LPPO1266</a>	Development Strategy	Comment	Within the section on development strategy, where development is discussed within the different settlements we would recommend that some text is included to highlight what the specific issues and opportunities are for the historic environment.	Comments noted.
	<a href="#">LPPO5121</a>	Development Strategy	Comment	<p>My issues with the plan are:</p> <ul style="list-style-type: none"> <li>• The proposals for 5000+ houses (12,000+) by 2031 extra people are extreme. This is a 12%+ increase in the WF population (and if most are in Kidderminster; a 20%+ increase in Kidderminster's.</li> <li>• The location of the bulk of the development is on the eastern edge of Kidderminster, in a ribbon development. This will have the effect of taking Kidderminster closer to the West Midlands, and the creation of a huge and unpleasant urban sprawl.</li> <li>• The majority of the new population will be commuters. In effect WF will become another overspill area for Birmingham. There are no estimates of what type of people will choose</li> </ul>	Comments noted. There is a legal requirement for Local Authorities to meet their housing need for their areas. The OAHN Study published in April 2017 calculated the housing need for the district, which was used as the evidence to inform the Preferred Options plan. Since the Preferred Options consultation, the Government has published their Standardised methodology for calculating housing need. The Council is therefore undertaking a revised OAHN study which will use the Government's new standardised methodology.

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				<p>to live here. What if they are all old and retired? The existing ageing population of WF will be worsened.</p> <ul style="list-style-type: none"> <li>• It is not made clear in the plan what benefit this will bring WF economically. Maybe some extra money in retail shops? Attract new businesses? No real case is made for this in the plan. However the South Kidderminster Enterprise Park continued development is welcomed.</li> <li>• Development of this magnitude will also bring huge pressure to local services, the environment, and transport – as it is not clear in the plan about what extra provisions are being made (i.e. schools, doctors, bus services etc.). It will not make WF a nice place to live, it will be the opposite.</li> <li>• It is not clear how some areas have been declared ‘Core’ and some as options (A and B). There should be more options at this stage, and less ‘Core’. Lea Castle Hospital is an exception, but BW/4, OC/4,OC/5,OC/6 are all deemed core for no obvious or strong reason.</li> </ul> <p><b>What can be done to minimise harm to the WF?</b></p> <p>Accepting that government and NPPF pressures have to be implemented, then to reduce the huge impact,</p>	

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				<p>the plans should consider;</p> <ul style="list-style-type: none"> <li>○ A clear plan for resolving the chaos on Hurcott Lane must be implemented before any work begins. It is a narrow country lane that cannot cope with today’s traffic, never mind the goods and service vehicles that will come.</li> <li>○ An eastern bypass road should be in place to ease the potentially huge impact on traffic in and around Kidderminster’s already creaking road system. If public money is needed then a case must be made back to the NPPF (it is their demands that will create the emerging issues that will come).</li> <li>○ ALL Brownfield sites <u>must be completed</u> before any Green Belt land is used.</li> <li>○ Any development must have a critical mass of houses to create a focussed community. Much needed shops, bus routes, schools and healthcare provision will only work in a concentrated development – not one thinly spread over 10 miles.</li> <li>○ Western Kidderminster (Low Habberley and Ferndale area in particular) has to be given much more</li> </ul>	

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				<p>consideration than has been already – and help keep WF separate from the West Midlands. Joining Stourport, Bewdley and Kidderminster is more attractive than WF joining with Stourbridge.</p> <ul style="list-style-type: none"> <li>○ Hurcott Pools and Pasture SSSI’s must be protected and respected much more!</li> </ul>	
	<a href="#">LPPO4405</a>	Development Strategy	Comment	<p>During the consultation period we are asked to study and comment on the merits of two options: -</p> <p>Option A. A large-scale development mainly on ‘Green Belt’ fields adjacent to the east of Kidderminster and to the rear of Offmore together with associated infrastructure changes.</p> <p>Option B Development being accommodated by dispersal across the district.</p> <p>Nick Boles, following the outcry of the Tory Party being accused of failing to protect the countryside, categorically stated that development on Green Belt land will only be allowed when Local Authorities can prove insufficient Brownfield sites are available. Also in a letter to Anna Soubry MP, then Health Minister, who opposed Green Belt development ‘it may mean building on <b>environmentally uninteresting</b>’ green</p>	<p>Comments noted. It is a legal requirement for the Local Authority to have an up to date Local Plan that meets the identified housing need. The Objectively Assessed Housing Needs (OAHN) Study sets out what our housing need is for the District. Unfortunately, we do not have enough deliverable brownfield sites left in the District. We therefore have to release some greenfield sites to be able to meet our housing requirements. This will include some greenfield sites within the Green Belt.</p>

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				<p>spaces'. This is in line with the with the 2012 Government National Planning Policy Framework which requires relevant planning authorities to 'take into account the economic &amp; other benefits of the best &amp; most versatile land'.</p> <p>Nick Boles as Planning Minister also in the last Government set out plans to make it easier for high street shops to be converted into residential housing.</p> <p>Michael Gove MP on his appointment as Environmental Secretary spoke of the importance of protecting productive Greenbelt land which will be so important when we leave the Common Agricultural Policy</p> <p>The plan is biased to Option A which provides far more detail than Option B. Also evidenced by the fact no 'drop-in' session was originally organized for the Spennells. You have to ask the question why? Blakedown (served by a railway station with opportunities for parking extension) has not been considered. We are told 'Developers had not submitted any proposals' This indicates certainly in respect of Option A, the draft plan has been led by housing developers.</p> <p>Large urban estates attract increased anti social behaviour &amp; crime rates &amp; should be avoided.</p>	



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				<p>Worcester NHS is in crises, £29m in debt, having to reduce its services &amp; also extend waiting times. It seems B’ham &amp; Solihull (by providing funding) are keen to relocate their population who are expensive for the local authority to provide for in terms of schools, GP surgeries, hospitals, etc. none of which generate profit but is not likely to export any of its business which provides income whilst requiring no social support</p> <p>Until WFDC develop a policy of ‘town living’, the Council are not going to attract more retailers to Kidderminster. In fact further decline will occur with the increase of on-line shopping &amp; the continual reduction in the number of banks building societies, etc. The Local Plan could give WFDC the ideal opportunity to develop a ‘town living’ policy. There are so many empty shops, offices &amp; factories (e.g.Dixon St.) just crying out for conversion to flats/apartments.</p> <p>It is vital to protect as much green space as possible to make Kidderminster not only a pleasant place to live but also bring up children.</p> <p>The Local Plan Consultation Document refers to WFDC obtaining funds from B’ham &amp; Solihull Enterprise Board &amp; its duty to co-operate with them. A small authority is likely to be outmanoeuvred in any discussions with them, having vastly larger legal &amp; financial departments, as has happened in Bromsgrove. If B’ham wishes to relocate overspill it</p>	

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				<p>would be difficult to resist especially when it offers ‘useful contributions’ to the development of Kidderminster station &amp; the proposal to resurrect the by-pass.</p> <p>In order to achieve ‘Town Living’, not only to maximise use of derelict/empty shops, offices &amp; factories for new homes, but also bring vibrancy to the town centre. Government has produced legislation to facilitate this. I m sure with the right approach WFDC can develop a proposal to meet the needs of its local population and maximise the use of brownfield sites across the District that is not led by developers looking towards Green Belt ( regardless of its quality) and the needs of Birmingham &amp; Solihull. The question is does WFDC have the courage, ambition and motivation to pursue such a course of action?</p>	
	<a href="#">LPPO2979</a>	Development Strategy	Object	<p>People living in the Wyre Forest area have not been given notification of all the proposed planning that may go ahead in this district. There are thousands of people in this district who do not have a computer or indeed buy a local paper to know what is being planned for the area, Maps and proposed planning forms should be distributed to all people in this area, Also Councillors should be made to attend all meetings on planned proposals for their areas.</p> <p><u>Objections to further buildings in this area of Wyre</u></p>	<p>Objection and comments noted.</p> <p>It is disappointing to read that you are not entirely satisfied with how the Local Plan Review Preferred Options consultation was conducted. There was a full 8 week public consultation which closed on Monday 14<sup>th</sup> August at 5pm. During this 8 week consultation period we held 8 drop-in sessions across the District for members of the public to come along and have their say. The drop-in sessions were all very well attended. Leaflets</p>

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				<p><u>Forest and on specific grounds</u></p> <ol style="list-style-type: none"> <li>1. I object to further buildings of houses in this area because if we continue to build houses etc all over Britain we will end up with no countryside at all and we will not be able to grow food on our great fertile soils or even feed ourselves with other countries suffering drought, fires, mud slides and war devastation. Gone will be our green and pleasant land. Also our water supplies will undoubtedly have to be rationed as will our food and electricity etc.</li> <li>2. Birmingham our 2nd biggest city is suffering from bad pollution, if we persist in building our area into Birmingham the people in Wyre Forest will also suffer from such pollution. The Government should have sorted out the most important policy of immigration with Brexit rather than building more and more homes. I am very annoyed about this and that our Government has passed laws to override Council decisions over buildings.</li> <li>3. The only buildings we need built are for industry and for a new hospital on the site of Lea Castle. We have a downgraded local hospital that can't cope with patients and neither can The Royal Worcester Hospital. Lives are being lost because hospitals in Worcs cannot cope</li> </ol>	<p>advertising the consultation and the drop-in sessions were posted to households within the District, there were also posters displayed in public areas throughout the District and it was advertised on the Council's website, Facebook and Twitter. There were several articles about the consultation in the Shuttle and the Express &amp; Star, and it was also on local radio stations and on the TV news.</p> <p>The consultation event was approved by our Local Plan Review Panel, Overview and Scrutiny Committee and Cabinet. We will however take your comments on board and will consider these issues next time we undertake a consultation event.</p>

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				<p>4. The local Council has squandered money on new sport centres and baths when others didn't need replacing yet whilst we get fewer services than we did in the past and when council tax spirals out of control for what? We have our fire stations and police stations highlighted to close and this is a great mistake.</p> <p>5. Too many houses have already taken up good agricultural land and our roads and bridges cannot cope with our massive population already. It is criminal to build on Green Belt land and only Brownfield sites should be used for industry which is sadly lacking in this area. The only jobs which seem to be available are supermarkets, and the health service and charity shops and fast food shops which is a disgrace. Our towns are down and out places to go which is a dreadful state of affairs.</p> <p>6. What other EU countries keep destroying buildings and rebuilding all the time. Old schools could still be used and other Victorian buildings made to last</p> <p>7. On grounds of health and safety I object to further building in this area except for what I have mentioned.</p>	

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION KEY ISSUES TO PARAGRAPHS 6.54 – 6.57**

Part of Document	Key Issues Raised	WFDC Officer Comments
Paragraph 6.54	<ul style="list-style-type: none"> <li>• We are not able to offer support to either Option A or Option B in their entirety as we consider that both options are likely to have significant harmful implications for biodiversity. We would therefore recommend a blend of the two options where site allocations likely to lead to significant adverse impacts on biodiversity are removed.</li> <li>• As the principal town the logic of allocating significant levels of development to the most sustainable settlement is understood and accepted.</li> <li>• A hybrid of the two approaches will be required to meet development needs over the plan period whilst maintaining a five year housing land supply and that further sites will need to be selected to support the delivery of housing.</li> <li>• This Options document represents another binary choice, Option A with supporting traffic and education support or Option B without. Was this document prepared to bias the choice towards Option A?</li> <li>• The lack of transparency and logic in key areas makes it very difficult to decide which option we would prefer</li> </ul>	A mixture of sites from options A and B are being taken forward.
Paragraph 6.55	<ul style="list-style-type: none"> <li>• No mention that the option would have a greater impact on the communities affected than a more dispersed option, where the strains on infrastructure could be shared.</li> <li>• Disagree with homes being built on Green Belt land which is easily seen by people on a daily basis. This should be protected to ‘safeguard and enhance landscape character’.</li> <li>• Eastern bypass will not make Kidderminster a more attractive place for businesses.</li> <li>• Access and egress from Spennells already difficult.</li> <li>• WFR/ST/2 is a productive piece of arable land.</li> <li>• Development in this area would go over the small ridge and continue down to the settlement of Stanklyn which would encourage urban sprawl.</li> <li>• Development would put extreme pressure on local roads and make already busy highways in the area intolerable at peak times.</li> <li>• Consideration should also be given to spreading any development around the</li> </ul>	<p>Green Belt is not a landscape designation.</p> <p>Development to the south of Spennells (option A) is no longer proposed as part of this Local Plan.</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>three towns and not concentrate it all in one area.</p> <ul style="list-style-type: none"> <li>• It is difficult to see where the money would come from for a costly relief road that has to pass over a main railway line.</li> <li>• There should be no erosion of the productive Green Belt land as there will be an increased need for the UK to provide more food production rather than import food once we have left the EU.</li> <li>• Loss of Green Belt will further endanger wild life, both flora and fauna.</li> <li>• Loss of Green Belt will also reduce the natural area for people to exercise, as the current areas have many public paths.</li> <li>• Health problems due to greater levels of engine exhaust emissions.</li> <li>• Current public transport is very poor and needs substantial investment to serve the current population levels let alone increased population.</li> <li>• A would be inappropriate until the Eastern By-Pass is completed and other alternatives explored.</li> <li>• Don't take away the natural beauty that Spennells residents are fighting for and are desperately trying to cling on to.</li> <li>• Dense development can result in social problems</li> <li>• Loss of public Rights of Way and a quality of life</li> <li>• Residents are not able to comment on whether a relief road would be appropriate or affordable</li> <li>• Loss of the natural break from the other nearby communities, creating an ugly urban sprawl.</li> <li>• The proposed housing is situated too far for most people to be able to walk into town so additional bus routes would be needed.</li> <li>• Green space is important for emotional and physical wellbeing.</li> <li>• Building on undeveloped land causes flooding.</li> <li>• Green spaces and farmland are important habitats for wildlife.</li> <li>• There are not enough jobs in the area to support this huge influx of people. This will render new developments commuter ghost towns and increase traffic on main roads.</li> <li>• Joining Spennells with the housing on Stanklyn lane is a perfect example of urban sprawl, something that the government have said should be avoided at all costs.</li> </ul>	<p>An eastern relief road is not longer being proposed. The existing road network will ne upgraded to allow HGVs to be routed away from Kidderminster.</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• Why does an area with an almost static population need so many new houses? Is it because we are to be used as an overspill for Birmingham in the same way that Redditch is?</li> <li>• Please consider the possibility of incorporating the Lea <b>Castle Hospital site</b> into Option A, <b>to minimise the impact</b> on agriculture, environment and the Green Belt. Inclusion of Lea Castle Hospital into Option A, would also have a positive outcome for transport in the Spennells, Stone and Summerfield areas, with or without the Eastern Relief Road.</li> <li>• This new housing would not be ring fenced for local people.</li> <li>• There is no guarantee that benefits would happen!</li> <li>• Option A includes only area of Corn Buntings in Worcestershire.</li> <li>• We reject Option A particularly because of the larger Green Belt land take, scale and concentration of development and the negative impact upon local amenity biodiversity, health, wellbeing and community identity.</li> <li>• Challenge the validity and use of the Green Belt Review and the consequences this has, in respect of Option A, for the fields between The Spennells and Summerfield.</li> <li>• The Option A proposal will damage irrevocably the social amenity of and biodiversity in the fields which separate The Spennells and Summerfield and undermine the integrity and unique identity of the Summerfield community.</li> <li>• The land is breeding home to Skylarks which are red listed.</li> <li>• The proposed new road (the Eastern Relief road) would totally destroy this environmentally sensitive area with increased air pollution, more noise pollution, light pollution and the destruction of large amounts of natural habitats.</li> <li>• The need for an eastern relief road is not based on any sound traffic planning data.</li> <li>• Removal of the fields which could diminish the mental health and physical well-being of the people who use them.</li> <li>• The fields are extensively used by local people to walk, run, cycle walk dogs and ride horses.</li> <li>• Increased traffic, noise and higher emissions from exhaust fumes thereby increasing risk to health.</li> </ul>	<p>The Lea Castle site has been extended to take in the surrounding land parcels and a sustainable stand-alone community is proposed at this location.</p>

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	<p>Increased pressures on hospitals, doctors, dentists and opticians</p> <ul style="list-style-type: none"> <li>• Loss of Green Belt status which protects our countryside from urban sprawl, threatening the existing public rights of way.</li> <li>• Loss of wildlife habitat.</li> <li>• Loss of good quality productive agricultural land.</li> <li>• It will not solve the housing crisis as the houses will not be affordable.</li> <li>• Lack of vision and seeks to doom Kidderminster to becoming a dormitory town for Birmingham without the necessary infrastructure to support it.</li> <li>• Presenting developers with the opportunity to build upon green field sites, currently outside of the Green Belt, will lead to urban sprawl to the southeast of Kidderminster, while brown field sites within the area remain undeveloped.</li> <li>• The options for redevelopment have been unfairly portrayed. Question 6.55 outlines benefits of Option A before asking for an opinion whereas question 6.56 outlines the disadvantages of option B before asking for an opinion. The document should be impartial and allow residents to create their own opinions and decisions independently and without influence from the council.</li> <li>• No comprehensive modelling of the Eastern Relief Road route benefits has been carried out and so the comments relating to the road in Paragraph 6.55 appear overly optimistic.</li> <li>• Biodiversity mitigation and enhancement necessitated by the road scheme will potentially have a detrimental impact on the developable area of nearby allocations and is likely to seriously limit their capacity to accept the proposed levels of growth.</li> <li>• We do not believe that the benefits offered by the larger scale development here outweigh the disadvantages.</li> <li>• if it were built it would only transport traffic from the bottleneck at Goldness Corner on the A449 slightly more quickly to the bottlenecks in Blakedown and Hagley on the A456.</li> <li>• Disproportionate focus of additional housing in Kidderminster.</li> <li>• Natural border removed between Wyre Forest and Wychavon.</li> <li>• Use of Green Belt only justified by proposed eastern relief road, which is only necessary if development proceeds. There is no need for the relief road without</li> </ul>	<p>Kidderminster currently has over half of the District’s population so it should be expected to take the majority of the proposed development.</p>



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	<p>the development as traffic can use the A450 from Hagley to Torton.</p> <ul style="list-style-type: none"> <li>• Spennells is already too big.</li> <li>• The land behind Offmore is considerably higher than other development and would be very visible.</li> <li>• The sustainability report suggests local employment to support the additional 1700 homes will be available from the businesses on the Worcester Road and Hartlebury Trading Estate. I do not believe these will expand to support the potential numbers involved.</li> <li>• Part of Option A (Spennells) has been shown to be unacceptable mainly on the grounds of storm and foul water drainage and flooding issues.</li> <li>• I cannot see how subjective and unproven benefits would outweigh admitted disadvantages.</li> <li>• The ‘beauty of the countryside’ has been cited in the plan as an important criterion but has not been given sufficient consideration in Option A.</li> <li>• Option A will remove important wildlife corridors which connect sites of special scientific interest and nature reserves.</li> <li>• Option A infers the inclusion of an Eastern Relief road; I believe that this is being used as a dangling carrot to encourage people to support this option. There is no evidence that in reality the relief road is any more likely to happen with this option.</li> <li>• Option A will just provide a commuter estate and therefore secure the Bypass.</li> <li>• Suitable brownfield land and not Green Belt should be the priority.</li> <li>• The amount of housing you propose to build is completely unnecessary and based on figures that apply to our nation as a whole and not the local area's needs.</li> <li>• There aren't enough jobs in the area to support this huge influx of people.</li> <li>• Would support the integration of small developments of less than 100 houses to be spread across the district on a variety of Green Belt areas so as to reduce the pressure on local infrastructure and services.</li> <li>• The proposed development is 3 to 4 miles away from the town centre.</li> <li>• The shaping of Option A to justify the relief road to resolve pre-existing transport problems and air quality is not correct. The relief road will not help with air</li> </ul>	<p>Development will be kept to the lower levels with the higher land left as green space. This open space will remain in the Green Belt to prevent its future release for development going forward.</p> <p>The dispersal of development over a higher number of sites would mean that existing schools would not have the capacity to take the additional pupils generated. Providing 2 large developments would allow for new school provision and additional community</p>

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	<p>quality in the Horsefair as the majority of traffic to Birmingham from Worcester use the A450 Worcester Road, which should be enhanced and the Bridge raised to accommodate the larger vehicles instead of creating a very expensive and unneeded additional road basically running parallel to this.</p> <ul style="list-style-type: none"> <li>• Stone parish is unfairly targeted in option A for housing and a relief road.</li> <li>• Option A does not address the need for affordable homes as prices will be too high for local residents as it's a low income area.</li> <li>• Current employment land lies vacant and unused on Worcester road since built what evidence is there that more is required and that it will be filled?</li> <li>• The by-pass will not add any growth to Kidderminster and will serve as a route to by-pass the town.</li> <li>• Offering A or Option B is a divisive and dangerous tactic — one that splits communities and gives way to resentment.</li> <li>• The current proposals (Plan A) seem to be filling people with anger, dread and upset.</li> <li>• This new housing would not be ring fenced for local people.</li> <li>• If Option A is selected then I believe the land at the rear of Spennells should be deleted from the Option as it is not needed.</li> <li>• Should Option A still be selected then I recommend the expanded Lea Castle site within Option B is transferred to Option A.6.55</li> <li>• Asks that the hedgerow and trees which characterise Stanklyn Lane be reinforced by a tree belt of between 15 and 20 metres width to protect the character of this country road and to mark a clear line between town and country.</li> <li>• We would also ask you to consider deleting that section of the site between the A448 Bromsgrove Road and the stream and fishing ponds. In our view, this relative small area will have an impact on the openness of the countryside and the Green Belt well in excess of what its size might imply. It will also effectively remove any gap between Stone and Kidderminster.</li> <li>• Several footpaths and bridleways will all be affected by the development of this area. We are not opposed to these paths becoming urban in character but would be opposed to development that was not sympathetic to their ability to continue to serve a valuable community function</li> </ul>	<p>facilities to be provided.</p> <p>An Employment Land Review has been undertaken by specialist consultants and updated in 2018 to reflect the latest requirements. The requirement for employment land in the plan period is closely linked to the housing requirement.</p> <p>The land alongside the A448 forms part of the Hoobrook LWS and will be protected from development. This area will not be removed from the Green Belt. The development in OC/13N will be screened from the A448. Views to/from St. Mary's Stone will be protected. An extensive network of footpaths will be provided as part of the proposed</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• Ramblers will be concerned that the road is bound to have a serious impact on the footpath network by forming a barrier to walkers’ ability to cross it</li> <li>• Development in the smaller towns and rural villages would help to support these areas through the provision of additional housing including affordable housing, as well as local jobs through construction.</li> <li>• Option A fits in with WFDC's plans for the redevelopment of Kidderminster, its Eastern Gateway, has good transport connections especially with the ability to support an Eastern Relief Road.</li> <li>• Option A is not perfect but does bring infrastructure which will decrease the overall impact.</li> <li>• Would still wish the Council to promote ‘brownfield sites first’ whilst they are still available and also to prioritise public sector land.</li> <li>• It addresses more of the strategic proposals with which I agree.</li> <li>• Plan A is more likely to attract new residents because of access to employment, education, shopping and other services.</li> <li>• Option A gives something to the area in terms of educational and transport facilities and so seems preferable to option B which will further overload existing stretched facilities.</li> <li>• Concerned that the release of land to the south east of the Lea Hospital site as proposed in Option B will have a significantly greater impact on the West Midlands Green Belt than will the Option A proposals.</li> <li>• Additional housing requires more investment in infrastructure/employment/communication links and new housing to the north and east of Kidderminster could attract businesses</li> <li>• Support the councils preferred option A, because building the majority of the houses on the Spennells and Lea Castle would be the most attractive for those people who choose to live in the Wyre Forest but their employment is within the surrounding towns and cities.</li> <li>• Eastern Relief road would benefit everyone in the Wyre Forest. It would help to relieve the congestion within central Kidderminster and be convenient for residents on the new estate who commute to Birmingham and the Black Country. Also new schools are proposed for the extension to the Spennells</li> </ul>	<p>development which will link into the wider existing public rights of way network.</p> <p>Proposals in the Local Plan will allow for affordable housing sites to come forward in the rural villages.</p> <p>Public sector land is proposed for allocation through the Local Plan.</p> <p>Significant additional landscaping is proposed alongside the release of land at Lea Castle to mitigate for adverse impact on the open landscape.</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>estate.</p> <ul style="list-style-type: none"> <li>• It seems that Option A would include new infrastructure whereas Option B will not include any.</li> <li>• I am in favour of keeping new homes near to potential employment site, schools and services whenever possible to reduce the travelling and pollution.</li> <li>• Support the Kidderminster Relief road, and development to the East of Kidderminster.</li> <li>• With the financial incentives available from the developers who develop these sites, it surely makes sense to concentrate them all in one area, where the incentives are large enough to make a difference, i.e. new schools, road improvement and community facilities rather than spread them throughout the District, thereby diluting the effectiveness of these financial incentives.</li> <li>• It seems logical to base houses closer to employment hubs, major transport links (rail &amp; road) and where there's potential for increased school provision.</li> <li>• Transport links, accessibility, and the provision of services including educational have been positively accounted for in the proposed Option A.</li> <li>• The benefits of Option A outweigh the disadvantages as long as the new infrastructure is built/developed at the same time as the housing to make it a sustainable development. It also ensures that there will be sufficient school places for the new residents.</li> <li>• Option A is on the best side of Kidderminster, improving road access to Bromsgrove, M5, M40, M6.</li> <li>• Employment - All proposed new employment opportunities are being shown on the maps as being in the Kidderminster area so it would make sense to build the new housing nearer to these jobs.</li> </ul>	<p>Concentrating development to the east / north-east of Kidderminster will allow for easy access to rail stations by sustainable modes. This would not be so true if development was concentrated elsewhere in the district.</p>
Paragraph 6.56	<ul style="list-style-type: none"> <li>• We do not believe that Option B as it is currently set out offers a sustainable solution to development at present.</li> <li>• The District Council is not in control of the provision of a relief road/school provision and cannot guarantee their provision.</li> <li>• Option B is more reasonable and realistic, but I would still question whether the existing infrastructure can support such a large number of new houses and the</li> </ul>	<p>Some of the Option B sites are being taken forward. Capacity is available in local schools to absorb pupils coming from these sites.</p>

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	<p>families that will live in them.</p> <ul style="list-style-type: none"> <li>• Option B requires the acquisition of numerous sites making the process slower and more complex.</li> <li>• Reluctantly supports Option B, but does not think they have been offered a fair choice at all.</li> <li>• I do not support option B. I would urge you to consider the requirements of local residents, rather than those of large developers.</li> <li>• Housing should be spread as equally as possible across Wyre Forest so that it does not negatively impact one side/area.</li> <li>• In favour of a sensibly modified Option B</li> <li>• Neither option envisages a community that could be centred in the midst of the development.</li> <li>• Much fairer to spread the developments.</li> <li>• People prefer to have a choice of area to live in to be close to existing friends and family so I believe spreading out development would be better for the people of Kidderminster.</li> <li>• Object to Option B.</li> <li>• Green Belt must be protected at all costs, use brownfield sites first for any houses/schools and doctors.</li> <li>• The sites in Areley Kings are not feasible and opposed.</li> <li>• Plan B would add to the traffic on the Areley Kings side of the bridge. The infrastructure would never cope with more cars. The schools, doctors and roads are at breaking point now.</li> <li>• It seems that Option A would include new infrastructure whereas Option B will not include any.</li> <li>• Option B is more dispersed and will not bring any improvements but will worsen traffic congestion on Bewdley and Stourport bridges and affect the air quality in Dunley Road area.</li> <li>• Green spaces and farmland are important habitats for wildlife, some species of which are rare/endangered.</li> <li>• The amount of housing you propose to build is completely unnecessary and</li> </ul>	<p>It is proposed to bring forward one of the Areley Kings sites but at a much lower capacity as local schools cannot accommodate the larger number of pupils. Transport modelling has shown that this would not impact significantly on existing traffic. Work is underway to relocate GP surgeries in the town. A large area of informal open space will be provided on the site.</p>

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	<p>based on figures that apply to our nation as a whole and not the local area's needs.</p> <ul style="list-style-type: none"> <li>• There aren't enough jobs in the area to support this huge influx of people. This will render new developments commuter ghost towns and increase traffic on main roads.</li> <li>• Loss of Green Belt will further endanger wild life, both flora and fauna.</li> <li>• Loss of Green Belt will also reduce the natural area for people to exercise, as the current areas have many public paths.</li> <li>• Current public transport is very poor and needs substantial investment to serve the current population levels let alone increased population.</li> <li>• Lack of infrastructure.</li> <li>• Does not come with any new infrastructure. Any development west of the River Severn will increase congestion and pollution in both Stourport and Bewdley.</li> <li>• Option B fails to take into account pressures on local services such as doctors, police and fire that an additional 1547 families will make to Stourport's already oversubscribed amenities.</li> <li>• Option B advocates urban sprawl in many different parts of the district.</li> <li>• If option B is selected, what plans are proposed to manage the extra traffic that is bound to arise with hundreds more houses expected?</li> <li>• Plan B has disadvantages, inc. access to facilities/traffic congestion.</li> <li>• A new Kidderminster Eastern Relief road will ease congestion but Option B will bring no new benefits and worsen current traffic congestion in Bewdley/Stourport esp. Bridge area.</li> <li>• The district Council is not trying hard enough to use the brownfield sites that are available.</li> <li>• Option B is totally unsustainable in that it places a lot of additional development the wrong side of the river in Stourport-on-Severn, creating increased traffic pressure on the bridge, pressure on existing schools in Areley Kings and there is little provision for shopping nor any medical provision that side of the river.</li> <li>• Loss of countryside, which is well used and loved by the local community.</li> <li>• It would deprive the locality of less good quality agricultural land.</li> </ul>	

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>Support:</p> <ul style="list-style-type: none"> <li>• More benefits from dispersed strategy.</li> <li>• Option B is preferable because it develops the community as whole not just Kidderminster.</li> <li>• Employment opportunities are located throughout the district so makes sense to have the housing also dispersed throughout the district so that local people can live closer to where they work, especially as local transport is poor.</li> <li>• Option B also helps to preserve open space between Kidderminster and the village of Stone.</li> <li>• <b>Option B details the type of change that would benefit the local area in the long run.</b></li> <li>• Support option B, because it already has existing development.</li> <li>• Option B would give greater opportunity for quality design and local distinctiveness.</li> <li>• Option B is less extreme, less impact in any one area.</li> <li>• Ability to build a greater number of houses, in areas where they are needed for local expansion.</li> <li>• support Option B because of the lower Green Belt land take and the lesser disadvantage to the Summerfield (and Spennells) community.</li> <li>• Option B plans for a larger number of houses, in areas where they reflect the local need.</li> <li>• Option B does not require the additional policing costs suggested in section 4.4.9of the WFIDP.</li> <li>• Less likely to attract overspill from B’ham/Solihull, therefore genuinely can be said to meet local needs across the District.</li> <li>• Will not require the construction of the essential Option A relief roads.</li> <li>• The various housing developments can run concurrently across the District, without major disruption, achieving the housing requirements more quickly.</li> <li>• Flexibility. Dispersed development is more able to react to changes than one large scale development.</li> <li>• Diversity. Spreading the development across the district will allow Stourport,</li> </ul>	<p>A mix of the 2 options is now proposed with development in all 3 towns plus provision for limited development in the rural settlements.</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>Bewdley et al to benefit rather than growing Kidderminster alone.</p> <ul style="list-style-type: none"> <li>• Prefer Option B as it utilises 20% less Green Belt land.</li> <li>• Lower impact on transport, schools and other local services. P</li> <li>• People will also be able to integrate more easily into the local community rather than becoming a satellite estate on the outskirts.</li> <li>• Option B does not need as much roadwork</li> </ul>	
Paragraph 6.57 General Comments	<ul style="list-style-type: none"> <li>• Green Belt land should only be considered as a last resort if all other options have been exhausted.</li> <li>• We <u>must think</u> of the future how best to make Kidderminster a pleasant &amp; welcoming place to live.</li> <li>• Refurbishing and developing Kidderminster town would be an excellent opportunity to bring the once beautiful buildings back to life.</li> <li>• We may need to consider building upwards – high rise flats.</li> <li>• Rural expansion outside of the Green Belt should be allowed where landowners were prepared to provide at least 50% affordable homes/starter homes.</li> <li>• A combination of Options A and B is most appropriate.</li> <li>• Housing around the town centre would help regenerate Kidderminster.</li> <li>• Can the council find a way to reduce property taxes to encourage small retail businesses back into the town and improve local economy?</li> <li>• Development should be spread across the whole district to ensure that urban sprawl is contained and building is within existing boundaries.</li> <li>• The Council should not allow land with planning permission to be ‘land banked’ and should lobby Parliament to ensure this is against the law.</li> <li>• Building a large number of houses along the eastern edge of the district would not encourage growth from within.</li> <li>• If there is a need for more, why not housing like mobile homes, modern, compact but permanent with communal laundries and gardens.</li> <li>• Compulsory Purchase Orders should be made on some of the larger vacant shops.</li> <li>• The amount of shop frontage in Kidderminster is in excess of need.</li> </ul>	<p>Proposals will include revitalising Kidderminster Town Centre with new residential developments and conversions of empty historic buildings.</p> <p>Sites will be expected to comply with affordable housing policy of 30% provision. A mix of house types / sizes and tenures will be required on allocated sites ranging from 1 – 4 bedroom dwellings.</p> <p>Once planning permission is in place, sites will be expected to be brought forward.</p> <p>The problem of large empty retail units is a national problem in large towns. Worcester Street is to be opened up to traffic and</p>



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Part of Document	Key Issues Raised	WFDC Officer Comments
	<ul style="list-style-type: none"> <li>• A large proportion of the existing retail zone in the centre of Kidderminster could be reallocated to housing.</li> <li>• Need to ensure there are no shortfalls in housing provision, especially in early years.</li> <li>• Build bungalows to free up family homes.</li> <li>• The plan should promote centralised housing development that reduces the dependency on car travel and lowers Co2.</li> <li>• Housing needs to run in conjunction with employment.</li> <li>• Development should be dispersed across the district as equally as possible so that no one area alone has to bear the brunt of the associated negatives.</li> <li>• WFDC should not build on any Green Belt land until all brownfield sites have been developed first.</li> <li>• Use existing empty properties in the town centre e.g. Woolworths site for a leisure complex (cinema/bowling alley) leaving Lionfields / Bromsgrove Street for residential.</li> <li>• <b>There is supply for 10 years if Lea Castle is developed.. No Green Belt site to be released until housing needs are reviewed after 10 years.</b></li> <li>• Further Review needed to check housing need and available brownfield sites.</li> <li>• Empty homes need to be utilised before any building work on new homes begins.</li> <li>• Future planning permissions given should have a time period that states any building work is started &amp; completed within a set time scale.</li> <li>• Our area needs to be more innovative in our buildings and become a known area for a sustainable district of innovative non traditional building method.</li> <li>• Opportunities to rid Kidderminster of unsightly and often derelict properties.</li> <li>• I can't see any mention of eco-housing. Surely all proposed housing should far exceed minimum insulation standards and incorporate solar panels as standard.</li> <li>• Development that allows for the building of the eastern relief road enables people to be connected to major road networks, allowing them to commute without getting gridlocked in town traffic.</li> <li>• We need suitable housing for elderly people to downsize to.</li> <li>• You have not demonstrated that there are insufficient brownfield (or green field</li> </ul>	<p>residential uses on upper floors are being implemented.</p> <p>Proposals / plans are well advanced on a number of large brownfield sites and it is hoped that these will come forward for development in advance of any Green Belt sites. Much of Lionfields is likely to be used for residential uses.</p> <p>The housing need has been recalculated using the recently adopted standardised methodology from Government. Planning permission is usually only valid for 3 years. A start on site must be made in that time.</p> <p>All housing needs to meet minimum building standards.</p> <p>With a rapidly expanding elderly population it is important to provide suitable</p>

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Part of Document	Key Issues Raised	WFDC Officer Comments
	<p>non-Green Belt) alternatives</p> <ul style="list-style-type: none"> <li>• Support infill development to south of Kidderminster.</li> <li>• ‘Political will’ at national level needed to deter land banking.</li> <li>• Focus on development areas and not a long featureless strip as current.</li> <li>• Many small business owners find it difficult to lease small offices. All that is proposed are large industrial units, there should be a mix.</li> <li>• Would love the council to carry on rejuvenating the town itself and make it a pleasurable place to visit with more restaurants, maybe an entertainment venue for concerts, shows.</li> <li>• Revisit all ‘vacant’ property in Kidderminster and the use of CPOs as required. Approach Housing associations to support with this.</li> <li>• The development of the inner town must be the priority long before any further outward expansion of Kidderminster is even dreamed of.</li> <li>• Kidderminster has great potential; it has canals and rivers and a few years ago was a thriving market town surrounded by beautiful country side, but if we are not careful it will become a commuter town that no one wants to visit.</li> <li>• Kidderminster does not need a Multicomplex cinema and more shops.</li> <li>• Whichever options are chosen the road network needs significant improvements to maintain safety and minimise congestion.</li> <li>• The present road between Black Bridge and Hagley should become a major dual carriageway with housing near it to rid the Worcester Road Island of its bottleneck.</li> <li>• Commuters to Birmingham and Worcester desire to live in the country. Build more villages on some green field sites outside Kidderminster to give people this option. This would disperse the concentration of people entering an already grid locked system.</li> </ul>	<p>accommodation for this age group. This will include smaller dwellings and also C2 provision for those unable to live on their own.</p> <p>Employment proposals are land allocations. The Employment Land Review has shown a requirement for smaller workshops / move-on units to be provided.</p> <p>Many of the brownfield redevelopment sites have river/canal frontage. Development just beyond the town centre has proved very popular with towpath links direct to the town centre. These wildlife corridors should also be enhanced as part of any redevelopment.</p>

**LOCAL PLAN REVIEW – PREFERRED OPTION CONSULTATION RESPONSES TO PARAGRAPHS 6.54–6.56**

Company / Organisation	Response No	Para / Policy	Type of Response	Summary of Response
Worcestershire Wildlife Trust	<a href="#">LPP01049</a>	6.54	Comment	<p>We are not able to offer support to either Option A or Option B in their entirety as we consider that both options are likely to have significant harmful implications for biodiversity. We would therefore recommend a blend of the two options where site allocations likely to lead to significant adverse impacts on biodiversity are removed. In particular we would recommend the complete deletion of the Core Site FPH1 (Settling Ponds, Wilden Lane) because of the unacceptable biodiversity implications arising from any development here. Mitigation for biodiversity impacts elsewhere will be required under both options and it is therefore not the case that there is a clear 'best' option to take forward in terms of biodiversity protection and enhancement. Notably however, impacts will be especially challenging to mitigate successfully at sites on the eastern edge of Kidderminster, meaning that pursuing Option B (i.e. with reduced levels of housing) in this area may offer significant advantages. Option B also has positive implications in terms of reducing overall Green Belt take and potentially offering more 'headroom' to the housing numbers, which in turn may allow for more on-site flexibility to accommodate GI. Taken together these are important benefits and we do not believe that they are outweighed by the difficulties set out in the consultation document. In particular we do not believe that the case for the eastern relief road has been robustly demonstrated in the evidence base for the Plan and so we do not as yet consider it to be a strong reason to pursue Option A.</p> <p>We provide further details of our position under the relevant allocation policies but here we also wish to raise a more general point regarding the evidence base on which the allocations and Options have been progressed to date. So far as we can ascertain there is no site by site analysis detailing likely biodiversity impacts in the evidence base for the Plan and it is not clear how biodiversity implications have been accounted for in the decision-making process. We are particularly concerned to see that the Sustainability Appraisal (SA) for the Plan concentrates simply on designated sites (Sites of Special Scientific Interest and Local Wildlife Sites) under SA Objective 9 rather than encompassing wider biodiversity as we recommended during the scoping process. At the very least we consider that the council should be taking into account habitats and species of principle importance as listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. The legal duty imposed on the council in this regard is set out in Section 40 of the Act and we strongly recommend that the evidence base is re-visited to take</p>

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				<p>account of this. We believe that the failure to consider habitats and species outside designated sites represents a fundamental shortcoming in the SA and may undermine the decisions taken so far. This is underlined by the overall SA finding that <i>'it would be expected that both options would have a significant positive effect on the district's biodiversity'</i>, which we consider to be highly unlikely at the moment. Further work to determine the impact of proposed allocations will be required to ensure that the Local Plan is based on sound evidence and can be progressed in line with the law and relevant planning guidance (see for example NPPF paras. 9, 17, 109,110, 117, 157 and 165). We would be pleased to discuss this fundamental issue with the council with a view to improving the evidence base for the Local Plan if that would be helpful.</p>
Bromsgrove & Redditch DC	<a href="#">LPP0898</a>	6.54	Comment	<p>The main concern of the Council is the location of the larger core housing sites, the fact that a preferred option is not specified, and that we are requested to make a choice of option A or option B in relation to significant development. The core housing sites, and also the majority of the option A and B sites are all situated towards the eastern / north eastern extent of the urban area of Kidderminster. As the principal town the logic of allocating significant levels of development to the most sustainable settlement is understood and accepted.</p>
North Worcestershire Water Management	<a href="#">LPP0925</a>	6.54	Comment	<p>Regarding preference for option A or B:</p> <p>As it is clearly set out in national planning policy that development should only be considered if it is not at risk of flooding and will not increase flood risk to others in theory none of the sites should have a negative impact upon flood risk. Having to position development outside floodable areas and having to include flood mitigation measures can obviously impact upon the viability of a site. However, this is on a site by site level and I therefore believe it is virtually impossible to have a preference for option A or B purely from a flood risk point of view, as both options contain sites that are partially at risk of flooding.</p> <p>I would say that in my experience it is easier to get a good surface water drainage scheme together for a number of larger sites than it is to get good schemes for a whole range of smaller sites. Based upon this, I have a slight preference for option A.</p>

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Gladman Developments Limited	<a href="#">LPO1422</a>	6.54	Comment	<p>Gladman believe that a hybrid of the two approaches will be required to meet development needs over the plan period whilst maintaining a five year housing land supply and that further sites will need to be selected to support the delivery of housing to meet objectively assessed needs in full. This approach will enable the strategic infrastructure requirements to be delivered and could also support the sustainability of settlements across the district through the release of small and medium scale sites that are favoured by SME builders. As part of the plan preparation process it is essential that development needs are met in full, with sufficient contingency provided to demonstrate an effective strategy is being brought forward. A review mechanism would allow needs of neighbouring authorities to be taken into account.</p> <p>Need to use evidence base to select both Green Belt and non-Green Belt sites. Consider that additional sites to those put forward under options will be needed.</p>
	<a href="#">LPO2401</a>	6.54	Comment	<p>If new builds are to take place, then the brownfield sites should be used first and then other land within the existing Green Belt boundary before you even start to think about redefining the Green Belt boundaries. There are many areas/ sites in Kidderminster that could be used first. Referring to Options A or B, the Eastern Bypass should be built anyway as some traffic relief is needed now between the Worcester Road and Birmingham Road and this will be increased, irrespective of whether you choose Options A or B. There is insufficient employment in the town to support the additional increase in population, so therefore they will have to commute to their places of work, adding to more congestion on already crowded roads in and around Kidderminster.</p> <p>It was said at one of the presentations we attended, that the building of new properties around the towns would encourage companies, whose employees live in the new builds for a few years, to relocate to this area. I don't think so, look at the number of shops and units we have already vacant in and around the town. We have seen a gradual decline in industry and retail over our years living in the area. Businesses will only move to this area if they are offered generous packages to do so.</p> <p>Due to the poor planning in Kidderminster in the past, the town now has no heart. The town centre manager said or intimated on H &amp; W recently when questioned about Worcester Street</p>

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				<p>and the number of empty shops that the chances of increased retail in this area were dead, so why are we proposing to open up Worcester Street at a cost of nearly £1000000? I think, if I heard correctly, if there is no chance that these shops will be filled.</p> <p>I think that the County and Town planners need to revisit and rethink their strategies over the future of Kidderminster and the surrounding areas. We accept that there is and will be a need for new housing, it is the method which is used to achieve the end result.</p>
	<a href="#">LPPO4694</a>	6.54	Comment	<ul style="list-style-type: none"> <li>• This plan basically states where housing is currently located, that is where the new development should take place. This will see the city centres getting busier, but the more rural environs becoming more deserted. Where is the planning to address this issue?</li> <li>• My biggest concern with this Options document is this represents another binary choice, Option A with supporting traffic and education support or Option B without. Was this document prepared to bias the choice towards Option A?</li> </ul> <p>If Option B is preferred for development location, that should not be used to penalise the quality of living after.</p> <p>I say this because I prefer the location of development to be Option B but with the traffic and educational support included within Option, but apparently to be denied in Option B. I feel we have had enough of all or nothing choices, so called fear or hope choices-we need to get this right for the future for us and our children</p>
	<a href="#">LPPO4803</a>	Option A	Object	<p>Option A has a more concentrated strategy than Option B. This may make it easier for the planners and builders but there is no mention that the option would have a greater impact on the communities affected than a more dispersed option, where the strains on infrastructure could be shared.</p>
	<a href="#">LPPO5107</a>	6.54	Object	<p>We have been asked to state a preference for option A or B as set out in the above Plan. Whilst it is accepted that the Wyre Forest District Council have an obligation, placed on them by Central Government, to produce a Local Plan that meets a set of pre-defined criteria, we have strong but logical objections to both options in the above current Local Plan. The lack of transparency and</p>

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				logic in key areas makes it very difficult to decide which option we would prefer. If the stated forecast of housing needs was accepted as fact which we do not accept and the choice had to be made solely on the grounds of the impact on the Green Belt then Option B would be preferred since it requires a lower percentage of Green Belt land than Option A. However we set out below the reasons why Option A and the core developments in Option A and in Option B should be rejected.
	<a href="#">LPP02969</a>	Option A	Comment	Option A fits in with WFDC's plans for the redevelopment of Kidderminster, its Eastern Gateway, has good transport connections especially with the ability to support an Eastern Relief Road.  Can provide the necessary support structure such as schools and recreational areas.
	<a href="#">LPP03019</a>	Option A	Comment	Option A is not perfect but does bring infrastructure which will decrease the overall impact.
	<a href="#">LPP03021</a>	Option A	Comment	There is limited choice as the 'core sites' appear to be predetermined. Given that choice, my preference is for option A, but some of the option sites in both A and B seem more sustainable than some of the core sites. For example the site identified as Wyre Forest Golf Club, corner of Kingsway, is isolated from the main development and town centre of Stourport. A more sustainable location nearer the centre and next to existing school provision would appear to be the now disused former Wyre Forest Golf Club land off Kingsway next to the Burlish schools. There may be sufficient land there to obviate the need for some or all of the 'core sites', some of which appear to have boundaries based on ownership, rather than spatial features.  With regard to schools whilst the additional need arising from the new housing seems to be recognised, there doesn't appear to be any sites identified.  I would still wish the Council to still promote 'brownfield sites first' whilst they are still available and also to prioritise public sector land.
Shrawley Parish Council	<a href="#">LPP01392</a>	Option A	Comment	Shrawley Parish Council wishes to make no observations with regards to Option A, proposed developments on the eastern side of Kidderminster.

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	<a href="#">LPP01838</a>	Option A	Comment	Preference: Option A, but disagree with homes being built on Green Belt land which is easily seen by people on a daily basis. This should be protected to 'safeguard and enhance landscape character'.
	<a href="#">LPP01975</a>	Option A	Comment	1. I am concerned that much of the proposed housing is on greenfield sites used by local communities. This is a serious loss. Are there really no brownfield sites left to develop?
	<a href="#">LPP0684</a>	Option A	Comment	We would like to make the following points: <ul style="list-style-type: none"> <li>1. Plan A is the most attractive to us.</li> <li>2. Plan A gives Kidderminster the opportunity to improve its local amenities in a substantial way.</li> <li>3. Plan A is more likely to attract new residents because of access to employment, education, shopping and other services.</li> </ul>
	<a href="#">LPP0278</a>	Option A	Comment	Option A with a new road, and infrastructure built is the only way forward.
	<a href="#">LPP0298</a>	Option A	Comment	I would support Option A and it addresses more of the strategic proposals with which I agree,
	<a href="#">LPP03150</a>	Option A	Comment	Option A is preferable as the problem of increased traffic would be addressed with the construction of a new road.
	<a href="#">LPP02370</a>	Option A	Comment	Not shown in searches when buying house  Prefer Option A as includes bypass, insufficient existing transport infrastructure in Stourport.
	<a href="#">LPP04917</a>	Option A	Comment	If Option A is selected then I believe the land at the rear of Spennells should be deleted from the Option as it is not needed. If it were still to be included then I would want assurance that development would not start until "core Sites" have been finished including the expanded Lea Castle site within Option B.



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				Should Option A still be selected then I recommend the expanded Lea Castle site within Option B is transferred to Option A.6.55
	<a href="#">LPP04653</a>	Option A	Comment	In effect, both Options A and B suggest ribbon development. Neither option envisages a community that could be centred in the midst of the development.  <u>Option A</u> assumes the building of a Kidderminster Eastern Relief Road. Who would pay for this? Developers could not be expected to pay for the bridge that would be needed.
	<a href="#">LPP04622</a>	6.55	Comment	If I had to vote for a proposal it would obviously have to be A as this seems to be the least invasive of the green areas as a whole.
RSPB Midlands Regional Office	<a href="#">LPP04407</a>	Option A	Comment	Specifically we wish to help answer the consultation question posed in paragraph 6.54.  The RSPB is a nature conservation charity, and therefore our comments below relate solely to nature conservation issues as they affect the choice between Options A or B. We do not have a mandate to comment on other issues including landscape impact, traffic, etc.  <u>Summary:</u>  If Option A is chosen the impact on wildlife of local and County importance (specifically, the local corn bunting population) is likely to be greater, and would prompt the need seriously to examine the scope for large-scale habitat compensation in the form of species-rich grassland creation for corn buntings, as part of the development package.  Our initial assessment of the land affected by Options A and B was that none of the areas put forward as development options were of significant value for nature. The areas affected are predominately farmland under intensive arable production, or improved pasture. The species present in those fields and hedgerows are likely to be widespread and familiar animals and plants found across the wider countryside in similar farmed habitats. Many of them are in decline but this is happening nationally, and in the main, the most effective solution to halting those declines

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				<p>does not (yet) lies with defending individual fields from development. In almost all respects we believe there is little to separate Options A and B, in terms of impacts on wildlife.</p> <p>Our initial assessment was broadly confirmed, very recently, by data received from West Midlands Bird Club (WMBC). We understand WMBC plans to send this same information to you as part of their own response.</p> <p>However, the one exception to the above assessment was WMBC’s data on corn buntings SE of Kidderminster. The data shows that 1km grid squares in the Stanklyn Lane area of SO8473, SO8474, SO8574 and SO8577 collectively support a population of corn buntings likely to be of at least county importance, and possibly regional importance in the West Midlands. The area seems to be particularly important as a wintering ground for significant numbers of corn buntings, with a small but important breeding population as well.</p> <p>Corn buntings were once very common birds of open grasslands and cereal fields across England, but numbers have crashed over the past few decades, to the point that we now face the real prospect of county-level extinctions in the West Midlands in the next decade or so.</p> <p>Corn buntings are already effectively extinct in Wales, and, we believe, Herefordshire. The bird is now Red-listed as a species of high conservation concern in the UK, following a catastrophic population decline of 90% or more since 1970.</p> <p>Having said above that the future of farmland wildlife does not depend on defending individual fields, for a few species like corn buntings a site level response is now justified if we are to hang on to the remaining 10% of the population. This is especially true in areas like Worcestershire, where corn buntings are on the very edge of their diminishing range. Getting wildlife <i>back</i> into a landscape once it has been lost is enormously more difficult and costly than making sure those species do not disappear in the first place.</p> <p>It is not possible to accommodate corn buntings within the layout of new housing estates. There</p>

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				<p>will need to be off-site compensation, and this must consist either of managing the remaining farmland better for corn buntings, or creating new flower-rich grassland adjacent to that farmland on a large scale. Calculations based on average corn bunting densities in different habitat types combined with WMBC data on the size of the local corn bunting breeding population suggests that an area of at least 200 hectares of grassland habitat will be needed.</p> <p>Obviously, this would have significant additional benefits for other wildlife, including pollinators, and could also contribute significantly to the strategic green infrastructure network to serve residents as much of it could be accessible to the public, most of the year.</p> <p>Obviously, achieving such compensation will be costly and difficult, not the least of which is ensuring its long-term management.</p> <p>For all these reasons, the RSPB favours Option B. However, if Option A is selected we recommend further consultation with WMBC to identify how and where best such compensation can be delivered. The RSPB would also be happy to advise further.</p>
	<a href="#">LPPO4485</a>	Option A	Comment	<p>If Option A is selected then I believe the land at the rear of Spennells should be deleted from the Option as it is not needed per my points above. If it were still to be included then I would want assurance that development would not start until “core Sites” have been finished including the expanded Lea Castle site within Option B.</p> <p>Should Option A still be selected then I recommend the expanded Lea Castle site within Option B is transferred to Option A.</p>
	<a href="#">LPPO3615</a>	Option A	Comment	<p>I would like to comment simply that Option A gives something to the area in terms of educational and transport facilities and so seems preferable to option B which will further overload existing stretched facilities.</p>
	<a href="#">LPPO3737</a>	Option A	Comment	<p>If option A entails an eastern route around Kidderminster, I think with common sense that this would be preferable to a western route.</p>

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	<a href="#">LPPO3823</a>	Option A	Comment	<p>My general concern is that the burden of new housing developments in the WFDC area need to be shared across the area and not almost entirely along the eastern boundary of Kidderminster which is essentially Green Belt land which is currently used as arable land growing essential food crops.</p>
	<a href="#">LPPO3856</a>	Option A	Comment	<p>Once these areas have been developed, further options could be explored if necessary, in 5-7 years time.</p> <p>I do not support either option. Please consider the requirements of local residents, rather than those of developers in this plan, as well as the implications of destroying the local countryside, which is well used and loved by the local community. Have a look at brownfield sites first.</p> <p>The Kidderminster Eastern relief road appears to take traffic from one busy road and feed it into another! A wider-scale review of the traffic round the Kidderminster area is needed, not merely an additional road.</p> <p>Please take this project one step at a time. Things change very quickly on a local, national, economic and demographic basis. Please think about the residents of Kidderminster and do not destroy their town.</p>
	<a href="#">LPPO3962</a>	Option A	Comment	<p>I would love to see a regeneration programme that really lifts the spirits of the people of Kidderminster.</p> <p>I am always happy to welcome change that improves the area for people. The current proposals (Plan A) seem to be filling people with anger, dread and upset.</p> <p>Is there any way the council planning could come up with some proposals that would enhance the Wyre Forest and make it an area we would be proud to live in?</p>

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				<p>In the light of the Kidderminster/Stourport link road, my vision would include:</p> <ul style="list-style-type: none"> <li>• Repurposing empty units and building new units in Stourport Road area to provide retail (like Primark) and companies (like OGL).</li> <li>• Look at what attracts people to the Merry Hill and include those shops in this area to encourage people to stay and shop local.</li> <li>• Relocate all the warehouse companies from New Road to the Stourport Road area.</li> <li>• Build all the affordable housing you require on New Road. Young people will be most attracted to this area because of its close proximity to the Railway Station and Town Centre.</li> </ul> <p>The following makes me feel happy. The thoughts of :</p> <ul style="list-style-type: none"> <li>• Providing affordable housing very near the town centre and railway station.</li> <li>• Regeneration of the current town centre to provide excellent retail and attract shops.</li> <li>• more businesses with highly paid jobs</li> <li>• bungalows with beautiful views lots of generous sized rooms and a nice sized plot for well off elderly people to encourage old people to move from their family homes</li> <li>• New spacious four bedroom houses with beautiful views, three/four reception rooms, quite large garden, definitely not open plan and overlooked.</li> <li>• Relieving congestion and making journeys to work easier.</li> <li>• Regeneration of parks that are free for people to visit.</li> <li>• Helping schools regenerate and develop, to help them be the best they can be for the young people in our area.</li> <li>• Hospitals providing the best care for all local people.</li> </ul> <p>The following makes me feel sad: The thoughts of:</p> <ul style="list-style-type: none"> <li>• Only retail, tourism and leisure jobs being provided.</li> <li>• 50% of the extra houses on the Green Belt land on the edges of town being for</li> </ul>

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				<p>affordable housing that are a stepping stone to help people get on the housing ladder and not forever homes, beautiful houses/bungalows.</p> <ul style="list-style-type: none"> <li>• A new road near housing that will create noise and pollution.</li> <li>• Turning the top of Spennells from a desirable, quiet, place to live, on the edge of town to a dreadful place to live.</li> <li>• Taking away habitat for wildlife.</li> <li>• Taking away free green space for Spennells people to visit on foot.</li> </ul> <p>I am highly concerned about the Plan A and the standard of living to be offered to people living near a railway line, industrial park and a busy main road A449 and the proposed new road. They would not be within close proximity of the railway station or the town centre.</p> <p>This new housing would not be ring fenced for local people. I do believe that the developers would do a good advertising job of their large new estate that would result in a large influx of people not local to the area and most likely commuters.</p> <p>If a few houses are developed here and there this would be less likely to attract large numbers of people that are not local to the area.</p> <p>Please consider creating:</p> <ul style="list-style-type: none"> <li>• Housing within close proximity of the railway station (easy walking distance).</li> <li>• Housing within close proximity of the town centre (easy walking distance).</li> </ul>
	<a href="#">LPPO4074</a>	Option A	Comment	<p>I neither fully support option A or B as they stand at present. Housing should be spread as equally as possible across Wyre Forest so that it does not negatively impact one side/area. I also would also not support Lea Castle becoming a huge estate because of its surrounding road links. I do not support any surge to push housing onto Lea Castle so that building does not have to occur to the South/Spennells area or Stourport— any building should be fair to ALL areas and the load</p>

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				<p>shared. There is argument that south of the town is better access to the motorways. I do not support building on the land opposite the entrance to Lea Castle. I am in support of a relief road, but were this not in the final plan then even more the need to ‘spread the load’ in terms of housing and commuting as well as easing traffic in already busy and congested areas. Controlling traffic flow/safety is paramount. Planning must take on board residents’ concerns so as not to disadvantage people like myself who have lived in Kidderminster and the surrounding areas all their life. People need to feel that Wyre Forest District Council is there for all its people.</p>
<p>Ramblers Association</p>	<p><a href="#">LPPO4134</a></p>	<p>Option A</p>	<p>Comment</p>	<p>Ramblers has strong views on the need to protect the open countryside and especially around major conurbations with such instruments as Green Belts the options offered in the Local Plan Review are not really very palatable to our organisation. However, we have concluded that Option A offers the best solution to the problem. We have reached this conclusion on the basis that it is important to maintain the separation of the 3 towns in the District, to protect the beautiful Severn Valley, the character of the two smaller market towns and the countryside to the west. We are also concerned that the release of land to the south east of the Lea Hospital site as proposed in Option B will have a significantly greater impact on the West Midlands Green Belt than will the Option A proposals.</p> <p>We do have some concerns about the proposal to release the large area of land to the south east of Kidderminster. In order to restrict its impact on the open Countryside we would ask that the hedgerow and hedgerow trees which characterise Stanklyn Lane be reinforced by a tree belt of between 15 and 20 metres width to protect the character of this country road and to mark a clear line between town and country.</p> <p>We would also ask you to consider deleting that section of the site between the A448 Bromsgrove Road and the stream and fishing ponds. In our view, this relative small area will have an impact on the openness of the countryside and the Green Belt well in excess of what its size might imply. It will also effectively remove any gap between Stone and Kidderminster.</p> <p>You will be well aware that several footpaths and bridleways will all be affected by the</p>

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				<p>development of this area. We are not opposed to these paths becoming urban in character but would be opposed to development that was not sympathetic to their ability to continue to serve a valuable community function. We shall also be opposed to their being subsumed within the urban road network. Urban footpaths need to be traffic free as are their rural counterparts not reduced to mere pavements at the sides of roads. Developers and designers should be made aware that existing features like these historic paths, hedgerows and trees should be incorporated within their designs.</p> <p>Paths should be incorporated into the green spaces as far as possible and where they cannot be found a function alternative paths should be provided to compensate for their loss. These issues should be included in a design brief which should be required as part of Policy 31. In addition, you should consider requiring an obligation towards improvements to the footpath network between this site and the town centre, employment areas, local shops, leisure facilities and the open countryside to ensure that they are fit for purpose.</p> <p>In addition to the public rights of way, there are many other regularly walked paths within the site which may or may not have accrued public right of way status. I have made a record of these and I would expect developers to have regard to these in so far as the paths have achieved a public status.</p> <p>My final comment regarding this particular site is that I note that the development is intended to fund the construction of the Kidderminster East Relief Road. None of the maps accompanying Local Plan review document appear to show its location. Ramblers will be concerned that the road is bound to have a serious impact on the footpath network by forming a barrier to walkers' ability to cross it. Suitable safe crossing points will be needed if the network of paths is to function properly. In addition, it is likely to have an adverse impact on the appearance of the countryside and contribute noise and air pollution. Once we have details of the alignment and design of the road we will be able to comment more effectively on this proposal and on proposed mitigation measures.</p>



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	<a href="#">LPPO2277</a>	Option A	Object	<p>NO benefits do not outweigh disadvantages. Eastern bypass will not make Kidderminster a more attractive place for businesses. Where are the new employment opportunities going to arise for people to walk/or cycle to work – they will not walk/cycle from the area to “EASTER PARK / Trading estate”.</p> <p>Route and details of eastern road not known, and where will access to new development be? Access and egress from Spennells already difficult and since the traffic lights were installed for the link road long queues. If a massive housing estate built for people who will not be able to obtain employment in Kidderminster the whole area will further become a commuter expansion town. Option A does not “Respect the Green Belt”.</p>
	<a href="#">LPPO2309</a>	Option A	Object	My objection is generally against option A but also against all building on Green Belt.
	<a href="#">LPPO2144</a>	Option A	Object	<p>I do not agree with the proposed change of the Green Belt between Spennells estate and Stanklyn Lane and so I object to the adoption of Option A for the following reasons:</p> <ul style="list-style-type: none"> <li>• The area WFR/ST/2 is a productive piece of arable land. The statement in the Green Belt review: “Landscape character and condition is of average quality, but with some evidence of the withdrawal of active land management evidenced through poor crop growth (in contrast to arable cultivation on land immediately to the north east)” is incorrect. I would suggest that the survey was done at the time when these fields had been put down to clover</li> <li>• Development in this area would go over the small ridge and continue down to the settlement of Stanklyn which would encourage urban sprawl.</li> <li>• This is a useful green space for wild life and humans. Home to Sky Larks and bats.</li> <li>• Development would put extreme pressure on local roads and make already busy highways in the area intolerable at peak times.</li> <li>• Pressure would be placed on the existing infrastructure such as medical treatment and schools.</li> <li>• There appear to be a number of Brown Field sites in Kidderminster before Green Belt is considered. Has the site once occupied by Wyre Forest Golf Club been included in the</li> </ul>

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				<p>review?</p> <ul style="list-style-type: none"> <li>Consideration should also be given to spreading any development around the three towns and not concentrate it all in one area.</li> </ul>
	<p><a href="#">LPPO2159</a></p>	<p>Option A</p>	<p>Object</p>	<p>We refer first to your request for residents to choose between options A and B of this Review. We prefer neither but wish to comment on their relative merits. In your document the choice is clearly presented in favour of Option A based on two major considerations: 1. provision of educational, medical and community facilities and 2. Provision of a relief road between the Worcester and Birmingham roads. It appears that this advice is related to planning convenience for WFDC. Our comments are:</p> <ol style="list-style-type: none"> <li>Wherever additional housing is built, extra facilities will need to be provided whether they be centralised in just one conglomeration, or existing provisions are expanded to suit needs.</li> <li>It is difficult to see where the money would come from for a costly relief road that has to pass over a main railway line. Funding has been refused before in less stringent financial times and you have provided no evidence that any would be forthcoming in the present case. It is difficult to see how the 'promised' provision of a ring road with option A can, for the purpose of this Review, be ensured.</li> </ol> <p>If one of the two options A or B has to be chosen then Option B would be the most equitable way of accommodating the suggested housing requirement rather than creating a continuous belt of housing between Stanklyn Lane and Baldwin Road.</p> <p>Non-Green Belt sites available for building can provide in the region of 3000 houses. This number should surely be more than sufficient for local needs.</p>

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	<a href="#">LPPO2262</a>	Option A	Object	<p>I would strongly recommend that you drop option A. Why can't you build on brownfield first when there are plenty of sites in Kidderminster crying out to being redeveloped first? Parts of Kidderminster town centre have been derelict for years now like the old post office and Woolworths just for starters.</p> <p>Then there is the problem with schools where are all the children going to go when they are already overflowing.</p> <p>The extra traffic will cause mayhem during the rush hour its bad enough now at certain times of the day.</p> <p>You are planning to build on green fields where there is plenty of wildlife at the moment but that will all disappear once you start building on.</p> <p>Have you even thought of the drainage problems this will have when we have heavy rain the drains can not cope building extra houses will only make this worse.</p> <p>Then what about all the people who use the fields for exercise and taking there dogs for a walk. And the people who exercise there horses on this land.</p> <p>Where are all these extra people going to go to the doctors, hospital when the NHS is already struggling in this area?</p>
	<a href="#">LPPO2268</a>	Option A	Object	<p>We oppose the adoption of the Local Plan, both Options A &amp; B including the Core Areas of The Captains and the Lodge because :-</p> <ol style="list-style-type: none"> <li>1. There should be no erosion of the productive Green Belt land as there will be an increased need for the UK to provide more food production rather than import food once we have left the EU.</li> <li>2. Loss of Green Belt will further endanger wild life, both flora and fauna.</li> </ol>

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				<ol style="list-style-type: none"> <li>3. Loss of Green Belt will also reduce the natural area for people to exercise, as the current areas have many public paths.</li> <li>4. Proposed building on areas designated as natural flood plans seems fool hardy, as there is plenty of local evidence showing the damaging effects this can have on other areas. I.e. Bewdley, Upton on Severn, Tewksbury etc;</li> <li>5. Loss of Green Belt will add to the global warming effects that are projected.</li> <li>6. The increase in population predicted in the new plan will not be able to be employed within Wyre Forest and will thus need to commute to Birmingham and West Midlands, and Worcester. The Wyre Forest has seen a reduction in manufacturing over the last 5 to 10 years in trades that rely on large numbers of workers. Any new businesses are more likely to be high tech and requiring less personnel.</li> <li>7. Due to item 6 above, roads will become more heavily congested, causing more health problems due to greater levels of engine exhaust emissions.</li> <li>8. The existing trunk road system in and around the Wyre Forest area is currently running at full capacity with no real plans evident to address the situation.</li> <li>9. Increased population will need more health facilities both at GP level and Hospital. Wyre Forest has seen Kidderminster Hospital services progressively reduced and this would need to be reversed. Likewise more GP surgeries would be required and the concern there seems to be a national shortfall in GPs. Whilst the Government states that more will be trained, the Royal College of GPs has revealed that some 20% are likely to leave. It is not clear in the Proposed Local plan if the areas required for additional medical facilities are included in the plan or would be additional to it.</li> <li>10. Current public transport is very poor and needs substantial investment to serve the current population levels let alone increased population.</li> </ol>
	<a href="#">LPPO2422</a>	Option A	Object	<ul style="list-style-type: none"> <li>• Objects to Spennells development.</li> <li>• Attack on the natural world and residents of Spennells.</li> <li>• There are other sites, including brownfield sites, which could be used.</li> <li>• Wyre Forest Golf Club could be used.</li> </ul>

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				<ul style="list-style-type: none"> <li>Disconcerting that the council has not explored other options for development.</li> <li>Like to go for walks etc. around the countryside at Spennells - development would take this away.</li> <li>No matter how many artificial gardens or concrete playgrounds you build nothing can equate to nature.</li> </ul>
	<a href="#">LPPO2432</a>	Option A	Object	<ul style="list-style-type: none"> <li>Objects to option A.</li> <li>Shouldn't use Green Belt land before utilising brownfield sites.</li> <li>Conservative policy is to build on Green Belt land only in 'exceptional circumstances' - this is not the case if Kidderminster.</li> <li>Town centre needs regeneration and is a disgrace.</li> <li>Spennells fields should be retained for future generations.</li> <li>In addition I feel that if Option A is adopted, traffic problems will increase greatly and air pollution will worsen in the Spennells area with potentially a major road and many more cars.</li> </ul>
	<a href="#">LPPO2482</a>	Option A	Object	After viewing the options proposed, we feel that Option A would be inappropriate until the Eastern By-Pass is completed and other alternatives explored.
	<a href="#">LPPO2486</a>	Option A	Object	<p>No one in their right minds would consider the use of this glorious natural resource as acceptable.</p> <p>I often use this as a necessary recreational activity as a way of escaping from the mental prison I find myself in.</p> <p>If this area is taken away there is no where else similar within walking distance where I could reach in order to enjoy the countryside.</p> <p>There are a bunch of other factors like traffic load, lack of infrastructure, already low water</p>

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				<p>pressure in the area.</p> <p>Please don't take this area away from people like me.</p>
	<a href="#">LPPO2490</a>	Option A	Object	<p>In a dying town such as Kidderminster, we do not need more families moving in, fighting for jobs that do not exist.</p> <p>Schools would need to be built to accommodate new children.</p> <p>I strongly object to Option A – in a dying town such as Kidderminster, we do not need more families moving in, fighting for jobs that do not exist, schools that would need to be built to accommodate new children moving into the area. It's a ridiculous idea.</p> <p>I am absolutely disgusted that the Wyre Forest District Council is considering building on our surrounding GREEN BELT! The Green Belt is about the only thing that Kidderminster has left to be proud of! Don't destroy this like you have the town centre that is now a ghost town thanks to the development of Weavers Wharf.</p> <p>Don't take away the natural beauty that Spennells residents are fighting for and are desperately trying to cling on to!</p> <p>Preserve the natural beauty that we currently are very lucky and privileged to enjoy.</p>
	<a href="#">LPPO2507</a>	Option A	Object	<ul style="list-style-type: none"> <li>• Preservation of Green Belt land for recreation is essential for health.</li> <li>• Impact on wildlife</li> <li>• Dense development can result in social problems</li> <li>• Residents are not able to comment on whether a relief road would be appropriate or affordable.</li> </ul>

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				<ul style="list-style-type: none"> <li>• The Plan B option slightly preferred as it uses less Green Belt/has easier road access to the Hagley road.</li> <li>• Blakedown Station car park capable extension, Kidderminster’s is not</li> <li>• This plan would also avoid the coalescence of two districts and would exacerbate existing congestion and pollution</li> </ul>
	<a href="#">LPPO2585</a>	Option A	Object	<p>Loss of green field space (Denying me open space) which is in walking distance, and being replace by increasing levels of noise and car pollution.</p> <p>Loss of public Rights of Way and a quality of life for my grand children and future generations.</p> <p>With such a large-scale build, surely it would make sense to create a new town elsewhere in the area.</p> <p>Planning it this way would ensure adequate funding for its own infrastructure. Instead of relying on the existing schools, doctors, road network etc.</p>
	<a href="#">LPPO2683</a>	Option A	Object	<p>I am writing to strongly object to the building of extra housing as explained under the draft Local Plan Preferred Options A and B. My reasons are as follows:</p> <ul style="list-style-type: none"> <li>• The population of Kidderminster over the last few years has remained fairly static and this proposal will unnecessarily attract more people into a market town that is currently ill equipped to handle such an influx.</li> <li>• Both Options will involve the loss of a tremendous amount of Green Belt and agricultural working farm land. Option A would be far more disastrous, and would also result in the loss of wildlife in the nearby woodland areas. I believe the Council has a duty to protect these Green Belt areas and the wild life that lives there for future generations.</li> <li>• Loss of local footpaths and bridleways, where many of the local residents and indeed schoolchildren spend recreational time, and indeed is the very reason why many people</li> </ul>

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				<p>have chosen to live here!</p> <ul style="list-style-type: none"> <li>• The building of houses under Option A, and to a lesser extent Option B, will cause the loss of the natural break from the other nearby communities, creating an ugly urban sprawl and eat into the lungs of Kidderminster. Furthermore, additional housing would increase the Carbon Footprint.</li> <li>• Heavy traffic on local roads which are not suitable for the amount of housing proposed. They are always in a poor state of repair which can only get worse, requiring additional Council spend.</li> <li>• The proposed housing is situated too far for most people to be able to walk into town so additional bus routes would be needed.</li> <li>• There will be an over capacity for local schools, doctors and hospitals.</li> <li>• At a time when the nearest fully functioning hospital is already stretched to capacity and under special measures and the local Kidderminster hospital is operating as a “drop in centre”, what guarantees can the Council make that the necessary and sufficient amenities for healthcare would be actually provided?</li> <li>• With BREXIT looming and the uncertainty that it will bring to the ability to forecast public spending, how can the Council justify increased expenditure on infrastructure and services necessary to support an expanded community, without jeopardising their ability to remain in office?</li> <li>• What Job opportunities are available for an increased population in a run down and depleting Kidderminster, where shops and businesses are closing at an alarming rate? Could this mean that eventually people will want to move away from Kidderminster to seek employment, ultimately defeating the object of attracting them there in the first place?</li> </ul> <p>I urge the council to throw out both Option A and B, not to destroy beautiful Green Belt and wildlife areas that can never be replaced, and to spend the money primarily on regenerating a rundown Town Centre. However, if it is proved to be a definite need for additional housing, then reluctantly Option B would be my preference.</p>



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	<a href="#">LPPO2758</a>	Option A	Object	Object to Option A
	<a href="#">LPPO2825</a>	Option A	Object	<p>In OPTION A the fields in Area 3 are productive farmland bordering a site of SSI effect on wildlife; development will:</p> <p>Impact on the biodiversity of site/result in loss of open spaces for recreational use and hospitals/doctors surgeries will be overwhelmed?</p>
	<a href="#">LPPO2710</a>	Option A	Object	<p>Please note my objections to both Option A and Option B. First of all, there are areas common to both Options, on Green Belt land. Does this mean these cannot be questioned?</p> <p>My objection is not that Kidderminster needs no additional housing, but Green Belt land should not be used:</p> <ul style="list-style-type: none"> <li>• Green space is important for emotional and physical wellbeing</li> <li>• Green space is a diminishing resource and should be protected. Once it is gone it cannot be regained</li> <li>• Loss of farmland will lead to insufficient food for the Country – imports are costly and cannot be guaranteed, especially with Brexit looming</li> <li>• Building on undeveloped land causes flooding. When land is covered by concrete/tarmac the surface water runs off and has to go somewhere. Broadwaters is already prone to flooding by the park, building at the top of the hill can only make this worse</li> <li>• Green spaces and farmland are important habitats for wildlife, some species of which are rare/endangered. From my garden I have personally seen deer, grass snakes and bats. Bats are a common sight in the evening – during the last few years I have found a dead long-eared bat and a horseshoe bat in my garden so I know for certain that those species live in the Hurcott area.</li> </ul> <p>Kidderminster’s infrastructure cannot cope with this expansion – schools, doctors, dentists and roads are insufficient. Numerous schools in the town have been closed over the last 10-15 years</p>

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				<p>– presumably the Council decided they were undersubscribed. Which is the mistake? Shortsighted decision then, or the apparently imminent population explosion now?</p> <p>Kidderminster Hospital has been downgraded. The closest A&amp;E department is now a 45 minute drive from the town. This will cost lives in times of emergency.</p> <p>Urban sprawl on the scale proposed is not in keeping with Kidderminster’s semi-rural character. The size of development planned for the north east side of town is massive – 1100+ houses in a tranche will completely alter the character of the town and destroy Hurcott Village, spoiling a historic area forever. The roads around the Park Gate public house, Hurcott Lane and Birmingham Road are already dangerous with numerous accidents occurring. The massive increase in traffic which would result from these plans would worsen the accident rate and cause gridlock. The Clensmore development has made the Horsefair congestion much worse as no change to the road system was included. Further development on this side of town will only add to this.</p> <p>Properties on the Silverwoods development remain unsold; why is there now a need for such massive development when there appears to be insufficient demand already? This huge building project was supposed to solve Kidderminster’s housing needs for the foreseeable future. Once again this contradicts decisions made by the Planners. Was the mistake then or now?</p> <p>There are not enough jobs in the area to support this huge influx of people. This will render new developments commuter ghost towns and increase traffic on main roads.</p> <p>I believe Kidderminster should use all of its brownfield sites before any further destruction of green sites is even considered. There are numerous factory sites and sites where schools have been closed – apparently these schools were not required but now they are needed again to support the massive expansion plans! The site at Sion Hill has planning permission but is still lying derelict. Crown House in the town centre is an eyesore and could be used, as well as the plethora of empty shops and offices in the town. This would rejuvenate the town centre; at the moment it</p>

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				is dying.  To summarise, I do not agree with Plan A or Plan B. I believe there is no need for such urban expansion.
	<a href="#">LPPO2725</a>	Option A	Object	Objection to the whole draft local plan for Wyre Forest.
	<a href="#">LPPO2853</a>	Option A	Object	I strongly object to Option A.
	<a href="#">LPPO2870</a>	Option A	Object	Page 30 5.13 Option A proposes a gross loss of 2.4% total Green Belt Land across the district and Option B a gross loss of 1.9%. Most sites are on high quality agricultural land and its loss cannot easily be mitigated. Redevelopment of Brown field sites has the potential for a significant positive effect.  OPTION A - Loss of Green Belt status which protects our countryside from Urban sprawl, and threatens the existing public Right of Way, which is good for the health and wellbeing of the population. Loss of good quality, productive agricultural land; crops are regularly grown, barley in 2017; according to Agricultural Minister, we need our agricultural land.  Loss of wildlife habit, skylarks, Linnets and other red listed birds nest in these fields, and there are protected Bats along Stanklyn Lane.
	<a href="#">LPPO2914</a>	Option A	Object	<ol style="list-style-type: none"> <li>1. Kidderminster cannot take volume of traffic the A448 and A449 are congested enough already.</li> <li>2. So many of our schools have closed already and the remaining ones are under so much pressure.</li> <li>3. Our hospitals in Worcestershire are full to capacity.</li> <li>4. Use brown field sites first, Lea castle, Sion Hill School, The old magistrate courts, Crown house, Green street Worcester street and Park Lane all have empty buildings.</li> <li>5. The wild life Skylarks, Kestrels, Starlings are protected what about their habitat are they</li> </ol>

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				<p>become extinct.</p> <p>6. The Green Belt needs to be protected less food and animal fodder will be grown if more Green Belt Land is taken. Farming is a way of life.</p> <p>7. Units at Easter park are still empty what about employment.</p>
	<a href="#">LPP02956</a>	Option A	Object	<p>Reasons why he objects to option A</p> <ol style="list-style-type: none"> <li>1. 1: The impact on the local wildlife would be catastrophic. There are many endangered species living on this land.</li> <li>2. Joining Spennells with the housing on Stanklyn lane is a perfect example of urban sprawl, something that the government have said should be avoided at all costs.</li> <li>3. Building so many houses in one area with no new shops, schools etc. is plain ridiculous.</li> <li>4. No Green Belt land should be built on until every single inch of brownfield has been used. When is the council going to realise that Worcester Street will never be the busy shopping street it used to be. The arrival of Weavers Wharf, Merry Hill &amp; the Internet have combined to see to that. Every building on the one side of Worcester street could be knocked down (Woolworth's side) &amp; replaced with housing. What about crown house? No building firm is interested in developing that site so why not turn crown house into flats? There are many other sites within the area where housing could easily be built.</li> <li>5. Why does an area with an almost static population need so many new houses? Is it because we are to be used as an overspill for Birmingham in the same way that Redditch is? If that is the case &amp; you still insist on building on the Green Belt why not use land on the way to Blakedown? This is closer to Birmingham &amp; would help to keep extra traffic out of Kidderminster. I would be especially interested to hear Marcus Hart's answer to this point.</li> <li>6. Profit is much higher for building firms when they are allowed to build on the Green Belt so I can see why they are so keen to go ahead with option A. Also the council would get a lovely new Road linking the A449, A448 &amp; A456 for free as well as a nice lump of cash.</li> </ol>

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				<p>But is this worth losing such a large amount of our beautiful countryside for? If the council decide it is I think that will prove once &amp; for all that the lunatics really have taken over the asylum.</p>
	<p><a href="#">LPPO2897</a></p>	<p>Option A</p>	<p>Object</p>	<p><b>Housing Need:</b> Does the district need the number of dwelling suggested in option A? The Preferred Options document states that the local population has remained relatively static since 1991 and has grown at approximately one third of rate of the West Midlands. Employment opportunities in the district have decreased considerably since 1991, with the demise of the carpet, and local engineering industries. This would suggest that the number of dwellings planned for Option A, is in excess of the actual requirements of the district during the period of the Plan, and could be readily met by Option B.</p> <p><b>Roads:</b> Option A would put considerable pressure on already busy roads. The residents of around 3700 dwelling accessing the A449 and A448 is unlikely to be helped by the Eastern Relief Road. Spennells Valley Road links the A449 and the A448 and there would be a considerable increase in volume of traffic, resulting in even slower flow at peak times and increased pollution.</p> <p><b>Schools:</b> The catchment area of the proposed option A would be serviced by schools with limited numbers of free places. Even if more places could be made available at the local schools (unlikely due to available land), this would contribute to pressure on roads as schools would be accessed via A449 and/or A448. The review suggests the possibility of new schools being built to accommodate the increase population. I understand the new schools would only be considered only after 1000 new dwellings have been built and occupied.</p> <p><b>Agriculture Green Belt &amp; Environment:</b></p> <ul style="list-style-type: none"> <li>• Option A uses a large area of productive agricultural land.</li> <li>• <i>Green Belt</i> - The Preferred Options document suggests that there would be limited effects of merging of communities with Option A. I believe that the effect would not be</li> </ul>

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				<p>limited and that Stone, Stanklyn Lane Summerfield would be largely subsumed into the enlarged Spennells Estate.</p> <ul style="list-style-type: none"> <li>• <i>Environmental Impact</i> - Increased traffic in the Spennells access roads would lead to additional pollution, not only for residents but also children attending local schools. Heronswood Primary and the small local shopping area attract a high volume of traffic in the mornings and after school in the afternoon. An additional 1700 homes are also likely to make a contribution to air pollution.</li> </ul> <p><b>Finally:</b> If Option A, was the chosen option, please consider the possibility of incorporating the <b>Lea Castle Hospital site</b> into Option A, <b>to minimise the impact</b> on agriculture, environment and the Green Belt. Inclusion of Lea Castle Hospital into Option A, would also have a positive outcome for transport in the Spennells, Stone and Summerfield areas, with or without the Eastern Relief Road.</p>
	<a href="#">LPPO3008</a>	Option A	Object	<p>The proposed expansion by up to 6000 dwellings and associated infrastructure represents a potentially very significant increase in the size of the population of Wyre Forest. Option A would concentrate most of this in Kidderminster increasing the population of the town in the order of 30% (according to the figures in section 2). Whilst concentrating the expansion into a few large developments would limit the number of existing residents affected, the impact on those affected would be disproportionately higher.</p>
	<a href="#">LPPO3011</a>	Option A	Object	<p>I welcome change that improves the area for people. The current proposals (Plan A) seem to be filling people with anger, dread and upset.</p> <p>I am highly concerned about the Plan A and the standard of living to be offered to people living near a railway line, industrial park and a busy main road A449 and the proposed new road. They would not be within close proximity of the railway station or the town centre.</p> <p>This new housing would not be ring fenced for local people. I do believe that the developers would do a good advertising job of their large new estate that would result in a large influx of</p>

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				<p>people not local to the area and most likely commuters.</p> <p>If a few houses are developed here and there this would be less likely to attract large numbers of people that are not local to the area.</p>
	<a href="#">LPPO3031</a>	Option A	Object	<p>Question 2 - Benefits easier delivery of school provision/Eastern Relief Road v. effect of large-scale of expansion to the east of Kidderminster</p> <p>Answer. - No, because history has shown there is no guarantee that this would happen!</p>
West Midland Bird Club	<a href="#">LPPO1533</a>	Option A	Object	<p>We strongly object to both proposals because of the devastating effect these proposals would have on all wildlife within the planned areas. This land is Green Belt Land, South of Spennells and WFDC Core area, East of Offmore Estate. These areas should be maintained for farming and for recreational use such as walking and bird, butterfly and moth surveying. The public foot paths and bridle ways are used daily by both residents and visitors.</p> <p>Option A includes only area of Corn Buntings in Worcestershire.</p> <p>It is our view no consideration has been given to the wildlife in the areas you intend to build on be it a Relief Road or houses. The words (<i>No nature conservation Issues</i>) is clearly not a correct. To support our views that these proposals should be rejected we enclose a number of documents:</p> <ol style="list-style-type: none"> <li>1. WMBC Members Records who visit both the Green Belt Land and Core Areas on a regular basis throughout the year.</li> <li>2. Records from the British Trust for Ornithology Bird Track System.</li> <li>3. Records sent direct to the Worcestershire County Recorder by Bird watchers either local or visitors of which there are many.</li> </ol>
Summerfield Against Land Transformation	<a href="#">LPPO1620</a>	Option A	Object	<p>We reject the scale of development and the concentration of housing required for the Kidderminster Urban Extensions - as set out in Option A.</p>

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				<p>We reject Option A for all the following reasons but particularly because of the larger Green Belt land take, scale and concentration of development and the negative impact upon local amenity biodiversity, health, wellbeing and community identity:</p> <ul style="list-style-type: none"> <li>• The Option A proposal will damage irrevocably the social amenity of and biodiversity in the fields which separate The Spennells and Summerfield and undermine the integrity and unique identity of the Summerfield community.</li> <li>• With reference to the Green Belt Review: Land to the r/o Spennells/Easter Park (13.48 hectares — 200 dwellings); Land off Stanklyn Lane (27.4 hectares —&gt; 350 dwellings); Captains and The Lodge (4.59 hectares — 135 dwellings) and Stone Hill (89.37 hectares —&gt; 2000 dwellings). A total of 2685. This is development on a wholly unacceptable scale. The Green Belt review itself concedes this would have a “most significant impact” on the Green Belt to the SE and NE of Kidderminster, that the “identity of Summerfield would change” and would do nothing to protect and enhance existing site and biodiversity interests . However, “master planning could mitigate the direct visual impact of development and hence the perception of spillage of the town into open countryside.”</li> <li>• We challenge the validity and use of the Green Belt Review and the consequences this has, in respect of Option A, for the fields between The Spennells and Summerfield, particularly the impact upon social amenity, biodiversity and the integrity and identity of Summerfield</li> <li>• We have ready access via PRow and other footpaths to wonderful green space which is used by riders, cyclists, runners and walkers for recreational and leisure purposes. We also enjoy the biodiversity and geodiversity whilst exercising, all of which helps to address obesity and promotes positive mental health</li> <li>• The land is breeding home to Skylarks which are red listed. Other species of birds also frequent this area including the red listed Lapwing and Marlin. There is real concern regarding the Skylarks and Lapwings who nest on the ground are in decline in Worcestershire and the rest of the United Kingdom. Even the Green Belt review conceded that development will not enhance biodiversity.</li> <li>• Any reduction in Green Belt near Stanklyn Lane would irrevocably change the quality of</li> </ul>



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				the landscape by reducing the amount of prime agricultural land, open countryside and damage the rural character of Summerfield. The unique identity and integrity of the Summerfield community would be threatened.
Wyre Forest Green Party	<a href="#">LPP01404</a>	Option A	Object	The proposed new road (the Eastern Relief road) would totally destroy this environmentally sensitive area with increased air pollution, more noise pollution, light pollution and the destruction of large amounts of natural habitats.
	<a href="#">LPP01642</a>	Option A	Object	Object to option A as its Green Belt; brownfield sites should be considered first. Local infrastructure - roads, traffic, schools, doctors insufficient/local hospital has no A&E.  Kidderminster town centre is worst it's ever been half the shops are empty/rates are high.  Houses could be built on former Glades old site, Park Lane, Mill Street, the old PO and above the shops in the town centre. Given £1.4 million cost of renovating 3 derelict cottages in the Horsefair then we should do so before touching Green Belt.
Spennells Against Further Expansion	<a href="#">LPP01742</a>	Option A	Object	We object to Option A.
	<a href="#">LPP01842</a>	Option A	Object	I would like to object most strongly to option A proposed development of Green Belt land adjacent to Spennells and Stanklyn Lane. <ul style="list-style-type: none"> <li>Green Belt land <b>MUST NOT</b> be used as an easy, cheap option. It should only be used after all available brownfield sites are used, and even then should be used <b>only</b> if there is no alternative to further expansion.</li> <li>The need for an eastern relief road is not based on any sound traffic planning data. This would not reduce in anyway town centre rush hour traffic, and this is where the focus should be. Traffic trying to leave the Spennells or Offmore estates to get to the town centre would not be using this road.</li> </ul>

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				<ul style="list-style-type: none"> <li>This Green Belt land is within walking distance of a large part of the population of Kidderminster who use it for general exercise, dog walking and this type of recreational activity. If this is no longer available residents will be forced to drive to other areas, thus increasing the traffic and pollution.</li> <li>This area is a large agricultural production area which is needed to feed the growing population.</li> </ul>
	<a href="#">LPP01936</a>	Option A	Object	<p>I object to the whole of Option A:</p> <p>This new development will lead to :</p> <ul style="list-style-type: none"> <li>Removal of the fields which could diminish the mental health and physical well-being of the people who use them. The fields are extensively used by local people to walk, run, cycle walk dogs and ride horses.</li> <li>Increased traffic, noise and higher emissions from exhaust fumes thereby increasing risk to health.</li> <li>Increased pressures on hospitals, doctors, dentists and opticians</li> <li>Loss of Green Belt status which protects our countryside from urban sprawl, threatening the existing public rights of way.</li> <li>Loss of wildlife habitat</li> <li>Loss of good quality productive agricultural land</li> </ul>
	<a href="#">LPP01937</a>	Option A	Object	<p>I object to both Options and I think it should be re-thought. This is a massive decision for Wyre Forest so we must be sure to get it right. Protect all Green Belt as far as possible.</p>
	<a href="#">LPP01886</a>	Option A	Object	<p>Concerned about both option A and B. Questioning the evidence to prove that building on the Green Belt is actually needed. Believes development of Green Belt should be avoided in light of: Brexit - it very productive farm land which will be of benefit to the country and local farmers if tariffs are placed on produce grown in Europe. The Green Belt stops communities merging into</p>

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				<p>one another and becoming yet another urban sprawl. Believes that the council should consider the needs and well-being of local people and put them at the forefront of their decision making. Both options also mean a disproportionate amount of housing development would centre on and around Kidderminster, which does not have the infrastructure to support it. Questions where does the money come from to provide new schools for these developments? Challenges the need for so many homes in the area. The growth forecasts on the OAHN have been over-inflated, as there has not been significant rise in the local population in the past 10-15 years. Concerned about employment in the Wyre Forest as most people commute to bigger towns and cities to work. Concerned about traffic congestion caused by commuters.</p> <p>Challenges the belief that not enough Brownfield sites are available. Suggests further development on the Silverwoods site and the Lea Castle campus. Also, Burlish Top Golf Course has been closed for about a year and, I believe, will not open again as a gold club viable for business venture, as there is already sufficient provision in the area. It is common knowledge that the golf course is not viable agricultural land as it is of very poor quality and would provide space for hundreds of homes (and possible school). There is also the old Parsons Chain site in Stourport.</p> <p>My preferred choice of the two, as it has less impact on Green Belt land, especially with regards to the fields adjacent to Spennells. Spennells Estate is already a large housing development and even option B is going to put pressure on the roads, amenities and school – which is already at capacity. Green spaces are extremely important for the well-being and mental health of everyone and the proposed development field in option B contributes to the physical and mental health of all who use it.</p> <p>The field is also important for wildlife and biodiversity. Red-listed birds, such as skylarks and linnets, use it as a valuable nesting site, as well as supporting other wildlife such as foxes, badgers, hedgehogs, sparrows and blackbirds. The hedgerow which runs from Spennells to Stanklyn Lane on the east side of the field is old and consists of a variety of mature species, e.g.</p>

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				<p>hazel, oak, elderberry, hawthorn and blackthorn and many species of birds use it for nesting.</p> <p>As a resident of Stanklyn Lane, believes it is totally remiss of Wyre Forest to impact on our community in the way that both options, but particularly option A does. Building right up to the boundary of Stanklyn Lane would completely change the semi-rural nature of this lane. If traffic was allowed to exit the new development onto Stanklyn Lane, the land would not cope. This is a country lane with no proper pavement for the majority of it and used regularly by horse riders, joggers and cycle clubs, not to mention walkers and dog walkers, none of which would cope with extra traffic. At one end of the lane the exit is onto the over-busy, accident riddled A449 Worcester Road, and at the other end there is a 90 degree sharp, blind bend before the exit into the Bromsgrove Road which is at the bottom of Stone Hill where traffic comes down at speed.</p> <p>Although I reluctantly support option B, I do not think we have been offered a fair choice at all and if this is indeed a consultation exercise, perhaps the planning policy team will take on board the objections I and hundreds of others in the Wyre Forest have submitted and come up with a better thought out option C. Finally, it seems unreasonable that an unelected planning policy team and a few local councillors on the planning committee have the power to make such momentous decisions that will have such a detrimental impact on so many people’s lives. Some of the planning committee also have Green Belt land earmarked for re-designation in their ward and will naturally be under pressure from residents to oppose development there and instead vote for it in another ward. I hope that this will not be allowed to happen.</p>
	<a href="#">LPPO2180</a>	Option A	Object	<p>I strongly object to the loss of Green Belt to build the proposed number of houses specified in option A.</p> <ul style="list-style-type: none"> <li>• There is a need for affordable housing, however by building on Green Belt, you lose the environment that makes somewhere a great place to live. To remove this seems very unfair when there are so many other areas of the district crying out for regeneration, making the area look tired and worn out.</li> <li>• Social isolation is a huge issue and also obesity and mental health. Access to this Green</li> </ul>

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				<p>Belt provides valuable, meaningful interactions with others, increasing mental and emotional wellbeing. The area is used by people of all ages to exercise; walking, running, cycling, horse riding, etc, alongside other leisure pursuits such as photography, bird watching, painting.</p> <ul style="list-style-type: none"> <li>• The Green Belt is teeming with wildlife, some of these (skylarks, corn buntings, bats) species are protected. It reduces pollution, helps with flooding, and provides valuable farmland.</li> <li>• The town centre is deserted at the top. Surely areas such as that, the old Glades, Lea Castle and Sion Hill School would be better sites for development.</li> </ul> <p>Once the Green Belt is gone we'll never get it back.</p>
	<a href="#">LPPO2192</a>	Option A	Object	<ul style="list-style-type: none"> <li>• Static population growth - no need for new houses.</li> <li>• Aging population downsizing - freeing up family sized houses.</li> <li>• High obesity levels - why build on Green Belt land where leisure and exercise activities occur.</li> </ul>
	<a href="#">LPPO2203</a>	Option A	Object	<ul style="list-style-type: none"> <li>• Targeting Comberton, Spennells, Offmore and Stone communities.</li> <li>• Serves only to defile natural countryside.</li> <li>• Devalues houses in the surrounding area.</li> <li>• Why build houses in an area with a high price range if the aim is to house poorer citizens?</li> <li>• It will not solve the housing crisis as the houses will not be affordable.</li> <li>• Should refurbish dilapidated areas to increase market value.</li> <li>• Expanding on Spennells will only devalue the area making it harder for people to buy/sell existing houses.</li> </ul>
	<a href="#">LPPO2205</a>	Option A - Spennells	Object	Further expansion will put a strain on local services.

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	<a href="#">LPPO2206</a>	Option A	Object	<ul style="list-style-type: none"> <li>• Objects to building on Spennells.</li> <li>• The creation of homes on Spennells/Offmore is unnecessary and damaging to the local environment.</li> <li>• Why build on Green Belt when there are brown belt sites available.</li> <li>• Developing brown belt sites will create housing which can be purchased by local residents - the houses being proposed will be unaffordable to locals.</li> <li>• If brown belt land is not utilised what about using Wyre Forest Golf Club?</li> <li>• The countryside is a place people can exercise.</li> <li>• We are told to buy local produce but if fields are built on where will the crops be grown?</li> <li>• Rich building companies are irresponsible and don't care about the environment.</li> <li>• The plans are toxic to the area and people.</li> <li>• Replanting saplings in the new development will not make up for what it taken.</li> <li>• Once the green land is gone - it's gone.</li> <li>• Don't want to lose our beautiful countryside.</li> </ul>
	<a href="#">LPPO2231</a>	Option A	Object	<p>I feel that many of the aims for the future of our local area are good. However, while I appreciate the need for the local council to make adequate provision for future housing, both for local people seeking affordable homes (including those seeking social housing) and to provide <b>some</b> housing which will encourage higher wage earners to move into the area, <b>I do not feel that Option A meets this need and that Option B would be preferable.</b></p> <p>In the past the local council has shown lack of vision in planning. I fear that Option A shows further lack of vision and seeks to doom Kidderminster to becoming a dormitory town for Birmingham without the necessary infrastructure to support it. My views are not based upon 'Not in my backyard' but because I care about the preservation of Green Belt and realistic improvement of the local area for local people.</p> <p>My main concern is that presenting developers with the opportunity to build upon green field sites, currently outside of the Green Belt, will lead to urban sprawl to the southeast of</p>

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				Kidderminster, while brown field sites within the area remain undeveloped.
	<a href="#">LPP02238</a>	Option A	Object	The options for redevelopment have been unfairly portrayed. Question 6.55 outlines benefits of Option A before asking for an opinion whereas question 6.56 outlines the disadvantages of option B before asking for an opinion. In order for this document to fairly ask for people’s opinions without swaying their judgment then both options should be weighed up with advantages and disadvantages before asking for the opinions of residents. The document should be impartial and allow residents to create their own opinions and decisions independently and without influence from the council.
Worcestershire Wildlife Trust	<a href="#">LPP01051</a>	Option A	Object	<p>We do not believe that the evidence base underpinning the Local Plan as yet demonstrates a compelling need for the proposed eastern relief road. In particular we note that no comprehensive modelling of the route benefits has been carried out and so the comments relating to the road in Paragraph 6.55 appear overly optimistic. Whilst some of the other benefits may accrue as a result of the increased development proposed in Option A we do not believe that the evidence base demonstrates with any clarity that they would not also be available in the absence of the road or indeed under Option B, which would still deliver development at a scale requiring appropriate infrastructure (including GI). This is particularly the case because the very considerable biodiversity mitigation and enhancement necessitated by the road scheme and required by policies in the Local Plan and NPPF will potentially have a detrimental impact on the developable area of nearby allocations and is likely to seriously limit their capacity to accept the proposed levels of growth.</p> <p>Accordingly, and in light of comments we make elsewhere regarding the risk to biodiversity caused by the Option A proposals in this area, we do not believe that the benefits offered by the larger scale development here outweigh the disadvantages. As we make clear in our response to Policy 6D it is our opinion that given the very significant environmental issues likely to arise from the relief road it may be better to seek alternative access arrangements, including improvement to the existing network of roads in the area, and a reduced quantum of development in this area until such time as the evidence demonstrates that there is an overriding need for the relief road.</p>

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				Please see our response to Policy 6D – Kidderminster Urban Extensions for further details.
	<a href="#">LPP0509</a>	Option A	Object	None of these options but another option
	<a href="#">LPP0610</a>	Option A	Object	<p>Object to option A. I don't think it meets the objective of providing housing for people already living in Wyre Forest. A huge expansion in housing on the east side of Kidderminster suggests it is meant to serve people commuting to Birmingham and the Black Country who are likely to travel by car and so contribute to increased traffic and air pollution along the A456. An eastern relief road has already been rejected on more than one occasion, if it were built it would only transport traffic from the bottleneck at Goldness Corner on the A449 slightly more quickly to the bottlenecks in Blakedown and Hagley on the A456. Anyone who has travelled on these roads at peak times will know how bad the traffic is now and a huge expansion in housing will make it worse. A relief road will only move the problem along a little, possibly exporting some of the air pollution into a neighbouring district without solving the overall problem of congestion.</p> <p>The proposed almost doubling in size of the Spennells housing estate would contribute to increased local traffic. Currently there are two exits to the estate and there can be difficulties getting out of the estate in the mornings due to traffic congestion. An increase in housing would make that much worse, and idling cars cause increased air pollution. Most parts of the estate have access to fields with public footpaths that can be used for recreation and exercise helping to combat the problem of obesity that has been identified in the district. Option A these fields will be built on and that amenity will be lost. There are no public footpaths on the fields further out so opportunities to exercise will be removed. The leisure centre is the other side of town and public transport is poor so opportunities for exercise will be greatly reduced for those without a car.</p> <p>There will also be an adverse impact on wildlife that uses Captains pool since the current access to the countryside will be cut off by housing making it hard for wildlife to move from one area to another. Similarly the nature reserve will be cut off and there will no longer be a wildlife corridor between the nature reserve and the countryside. This could have an adverse effect on the</p>



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				<p>viability of breeding populations of wildlife.</p> <p>Although option A is said to enable more effective school provision and provides for free schools at primary level it does not adequately account for the increased need for places at secondary level. The closest secondary school is the split site King Charles I School. Although there may be potential for some expansion of the lower school site on Borrington Road, the upper school site is surrounded by housing and there is no room for further expansion. Under "Building schools for the future" it was planned that the school would be replaced by a new single site school on the Borrington Road site extending into part of the Green Belt. If that land is used for housing it removes the option for expansion of King Charles I School and makes it hard to provide the extra school places required at secondary level.</p> <p>Option A would also have an adverse effect on the Wyre Forest Rural polling district, since all the new houses in the extended Spennells housing district would be within this ward. This would be a large number of suburban Kidderminster households voting on matters affecting rural areas of Stone, Chaddesley Corbett etc and potentially outnumbering those communities so that their views were no longer taken into account.</p>
	<p><a href="#">LPPO677</a></p>	<p>Option A</p>	<p>Object</p>	<p>I object to OPTION A.</p> <p>Option A would have a significant, negative impact upon biodiversity and “Green Belt/developed area” - giving the impression of urban sprawl effecting the distinctive identity and attractiveness of the district.</p> <p>Disproportionate focus of additional housing in Kidderminster would add substantial risks to transport, school, amenity requirements in the area- and take away a positive green/environmental outlook and experience forever.</p> <p>The proposal in respect of Heath Lane is impractical and dangerous. Walking along this lane often find having to climb a bank to allow a single lane of cars to pass. Any additional traffic is an</p>

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				<p>accident waiting to happen!</p> <p>If pursue Option A, “natural border” removed between Wyre Forest and Wychavon suggest you consult residents and the government on advantages of merging councils.</p>
	<a href="#">LPPO156</a>	Option A	Object	<p>I object as neither are viable options.</p> <p>Use of Green Belt only justified by proposed eastern relief road, which is only necessary if development proceeds. There is no need for the relief road without the development as traffic can use the A450 from Hagley to Torton.</p>
	<a href="#">LPPO333</a>	Option A	Object	<p>I submit the following objections to OPTION A :</p> <ul style="list-style-type: none"> <li>• the land proposed for this Option is agricultural land and has been used for food production during the whole of the time I have lived in my house (32 years)</li> <li>• The whole project does not appear to have been well thought out. WFDC is asking residents to submit details of any other sites that they may know about. Surely that is the job of WFDC Planning Dept.</li> <li>• In 2016 we had planning permission refused to fell trees behind our house as the proposed works would have “an adverse effect on the amenity of the local area”. If a single house can have such a “damaging” effect then how can WFDC justify building hundreds of houses on the same field?</li> <li>• Spennells is already too big.</li> </ul>
	<a href="#">LPPO403</a>	Option A	Object	See summary LPPO400.
	<a href="#">LPPO425</a>	Option A	Object	<p>I object to Option A and Option B.</p> <p>Green Belt land should be used only as a VERY LAST RESORT.</p>

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				<p>Wyre Forest, Greater Birmingham, Solihull and Worcestershire should collaborate and collectively review overall brown field site availability and plan housing development accordingly – decisions to build on the Green Belt should not be based on local authority boundaries.</p> <p>The 5 year rolling time frame for construction sites should allow for regular reviews of brown field sites and enable changes to be incorporated into any plan,.</p> <p>The plan fails to recognise changes in shopping habits and unrealistically targets retail expansion and comparison shopping.</p> <p>Kidderminster has suffered from the failure to 'tidy up 'following the migration of Kidderminster town centre to Weavers Wharf and Crossley Retail Park.</p> <p>Retail premises and the courts building have been empty for 8 /9 years - the regeneration of such sites require radical solutions for alternative use that reduce any need to build on the Green Belt.</p> <p>Unnecessary decisions are being taken now e.g. in 1999 who could have predicted the impacts of the 2007/08 economic collapse or changes caused by online shopping (indeed, the plan itself demonstrates an inability to predict /understand short term population levels in the District).</p> <p>The plan fails in its stated aim to "to use a robust and up-to-date evidence base to ensure that the local plan meets the full, objectively assessed needs for market and affordable housing in the housing market area" . Instead it aims to justify what developers want to deliver rather than meet the needs of Kidderminster residents.</p> <p>Previous attempts to build an Eastern relief road have failed - the plan fails to present evidence based data that supports it in economic or environmental terms - at the consultation session I was informed this would be a single carriageway 40 mph road following the same route as the existing road from the Worcester Road through Mustow Green to the Birmingham Road - is it</p>

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				<p>really a relief road at all?</p> <p>Whilst constructing a new school in the Spennells area appears attractive this (together with the promise of the 'relief road' shouldn't be the determining factor when opting to build on the Green Belt – other options should be sought.</p> <p>Many people commute into / and out of Kidderminster now (hence the railway station development) - and have done so for many years. This situation equally relates to the areas covered by the LEPs identified in the plan.</p> <p>Whilst economic development in Kidderminster will be welcome - past experience shows this will take time – in the meantime people will continue to travel.</p> <p>Immediate need is for fresh radical thinking that optimises the use of brown field sites throughout the LEP areas for residential use and enables Kidderminster itself to become a modern, contained and attractive town centre that incorporates retail leisure and residential opportunities rather than pursue outdated models from the past - 'mixed use' communicates little other than the elements of 'wishful thinking' so often reported in the local press over numerous years.</p>
	<a href="#">LPP0486</a>	Option A	Object	I object to Option A
	<a href="#">LPP03142</a>	Option A	Object	<p>I would like to raise my deep concerns regarding the proposed housing development <b>Option A</b> under the local plan review. I think such a large scale development would be extremely detrimental to the physical and mental health of existing and new residents for a number of reasons:</p> <ul style="list-style-type: none"> <li>• The loss of access to valuable Green Belt areas that enrich the lives of all residents</li> <li>• The rise in air pollution from increased traffic</li> <li>• The increased everyday stress from an already congested area</li> </ul>

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				<ul style="list-style-type: none"> <li>• The lack of essential amenities (including school and doctor surgery places) to accommodate such a growth in population</li> </ul> <p>I am hopeful that the Council, elected to represent the needs of their constituents, will take these concerns into consideration</p>
	<a href="#">LPPO3059</a>	Option A	Object	I do not support Option A. The land behind Offmore is considerably higher than other development and would be very visible. Schools in the area are already full it would be nice to be a sustainable community and not just fields of houses.
	<a href="#">LPPO3068</a>	Option A	Object	<p>Having viewed the report and considered the alternatives, <b>I favour the proposals put forward in Option B</b> and object to option A for the following reasons:</p> <ul style="list-style-type: none"> <li>• The area's population is almost static and it seems that the council's estimation of the number of new homes needed is too high, meaning that there is room to accommodate the needed homes without using the additional Green Belt land included in Option A.</li> <li>• If an extra 2% of Wyre Forest's Green Belt is made available to developers it will, in all probability, be used for housing while brownfield sites/derelict buildings, forming a blight zone around the town centre, will be allowed to remain undeveloped.</li> <li>• Development of brownfield sites and derelict buildings in and around the town centre would help to rejuvenate the town.</li> <li>• If the expanded Lea Castle site were used to its full potential then many of the needed homes could be accommodated there along with the necessary infrastructure (school, local shops etc) Development of this site would not put further pressure upon the already busy, Bromsgrove and Worcester roads.</li> <li>• An Eastern bypass/link road, joining the Worcester road, Bromsgrove road and Birmingham road would not alleviate traffic congestion and would cause air and noise pollution within in a residential area.</li> <li>• Mental health and welfare is an increasing issue in this country and it is proven that green space and fresh air and exercise are hugely beneficial in combating mental health issues such as anxiety and depression. How can the removal of an area like this be</li> </ul>

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				<p>justified?</p> <ul style="list-style-type: none"> <li>• The fields to the East of Spennells are of high quality agricultural land and should continue to be used for food production.</li> <li>• The fields provide valuable habitat for wildlife.</li> </ul> <p><b>I object to the proposals put forward in Option A and favour Option B.</b></p>
	<a href="#">LPPO3181</a>	Option A	Object	<p>In principle objection to loss of Green Belt sites.</p> <p>Concern at expansion and sprawl of Kidderminster eastwards around Hodge Hill area.</p> <p>Inadequate infrastructure to support housing and employment uses/development near Hodge Hill on A456, Hurcott Lane and Husum Way junctions.</p> <p>Concern at lack of infrastructure detail in the plan for the Core and Option Sites to East of Kidderminster.</p> <p>Such development will put undue strain on the existing rural road network with drivers using lanes as rat runs to connect to the A456 and onwards to M5 and A38.</p> <p>In particular Hurcott Lane, Perryford Lane, Rocky/Stakenbridge Lane, Churchill Lane, Wagon Lane, and also south of A456 including Belbroughton Road.</p> <p>Concern at any effect on Hurcott Pool – SSSI – and watercourse network.</p>
	<a href="#">LPPO3195</a>	Option A	Object	<p>The sustainability report suggests local employment to support the additional 1700 homes will be available from the businesses on the Worcester Road and Hartlebury Trading Estate. I do not believe these will expand to support the potential numbers involved.</p> <p>The resulting additional vehicles will have to get on to one of the already congested B roads</p>

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				<p>around Kidderminster. As the new by-pass to Stourport has resulted in major congestion. It is currently very difficult to get out of Wilden Lane at most times of the day and almost dangerous when it gets near rush hour.</p> <p>Surely 'Option A' which disperses the additional homes around the area would be the most beneficial for congestion and general facilities.</p>
	<a href="#">LPPO5112</a>	Option A	Object	Option A would use valuable Green Belt agricultural land surrounding the Spennells estate, which is currently in production.
	<a href="#">LPPO5123</a>	Option A	Object	I object to the parts of the Core plan and Option A.
	<a href="#">LPPO5141</a>	Option A	Object	I do <b>not</b> support Option A for all the above reasons but particularly because of the larger Green Belt land take, scale and concentration of development and the negative impact upon local amenity, biodiversity, health and wellbeing and, most importantly, community identity.
	<a href="#">LPPO4839</a>	Option A	Object	<p>Part of Option A (Spennells) has been shown to be unacceptable mainly on the grounds of storm and foul water drainage and flooding issues. Also other constraints, issues and discrepancies relating to the consultants reports. In my view the development here would have a serious impact on Urban Sprawl.</p> <p>I have questioned whether the Eastern Relief Road would do anything other than transfer stress to other pinch points on the existing highway network. I can't see how it would improve town centre congestion other than where perhaps the A449 passes through the Horsefair. A traffic modelling analysis may be helpful here but it is not evident that one has taken place. Therefore I cannot see how subjective and unproven benefits would outweigh admitted disadvantages. These disadvantages I believe I have shown to be far more serious than anything shown in the Options Review.</p>
	<a href="#">LPPO4651</a>	Option A	Object	The benefits of Option A do not outweigh the disadvantage caused by the large-scale of expansion to the east of Kidderminster that would be necessary.

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				<p>Objections to Option A on Planning grounds:</p> <ul style="list-style-type: none"> <li>• The ‘beauty of the countryside’ has been cited in the plan as an important criterion but has not been given sufficient consideration in Option A. See Annex 1 below for detail.</li> <li>• Option A proposes building on Green Belt land which can happen only in exceptional circumstances which have not been demonstrated). See Annex 2 below for detail.</li> <li>• The plan has not adequately demonstrated the need for 5,400 new dwellings <u>specifically</u> on Green Belt land. The correlation between the population and the years considered (2001 to 2015) explains less than 5% of the variation (Pearson method). See Annex 3 below for detail.</li> <li>• The development of farming land is permitted <u>only</u> if unavoidable. Option A contains well managed farmland with no justification presented for its loss. See Annex 4 below for detail.</li> <li>• Option A will remove important wildlife corridors which connect sites of special scientific interest and nature reserves. See Annex 5 below for detail.</li> <li>• There is a lack of adequate road capacity and infrastructure for an expansion of the Spennells with no real prospect of the infrastructure being developed. See Annex 6 below for detail.</li> </ul> <p><b>Annexes</b></p> <p><b>Annex 1;</b> Sections 5aiii, 11.1, 11.2 and, 23.1 respectively set out the importance of;</p> <ul style="list-style-type: none"> <li>• access to facilities for those without cars;</li> <li>• recognising the intrinsic character and beauty;</li> <li>• protection and enhancement of the natural environment and</li> <li>• Promoting activities such as walking and cycling.</li> </ul> <p>Around 3,000 houses are within easy walking of the fields; providing access to the countryside to many as a healthy, leisure pursuit. However, the LCA cited states that account has not been</p>



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				<p>taken of scenic beauty. I have added a few pictures that could not be taken following Option A’.</p> <p><b>Annex 2;</b> Option A proposes building on Green Belt. The Government recommends, ‘maintaining strong protections’, and clarifies that, ‘Green Belt boundaries should be amended only in exceptional circumstances and where <u>all</u> other reasonable options have been examined’. Policy 6B commits to ‘encouraging the effective use and re-use of acceptable brownfield land, safeguarding and enhancing the open countryside. I recognise that <u>some</u> residents <i>think</i> that Green Belt is a landscape protection tool, but very little commitment to policy 6B or of other options being ‘fully examined’ has been presented.</p> <p><b>Annex 3;</b> The ‘reasoned justification’ outlined is predicated on ‘unusual demand’. However, Figure 3.1 is extremely misleading. The trend to 2034 which predicts 5,400 dwellings appears to have been based on the population figures which explain less than 5% of the total variation (Pearson method). The poor correlation is evident by scrutinising Figure 3.1 from 2001 to 2015. The study does an excellent job of teasing out other factors affecting population such as the age demographic, economic factors, international and national migration and even tries to take account of Brexit, but since the conclusion is that these factors play a minor role on population change the predictive method used remains crucial and is erroneous. The increase from 2001 to 2015 has been 2.7% <u>in total</u> and Table 2.0.1 suggests static population growth. Despite the Council’s best efforts to encourage job growth, for which we are all grateful, the carpet industry continues to decline, so maintaining the number of jobs would be an outstanding outcome. In section 2.4, it is acknowledged that the carpet industry in Kidderminster (population 56,185 in 2015) has been in decline since 1970s. Furthermore, there are numerous examples of construction and development companies holding property with planning permission around the Wyre Forest. If there were high demand, work would start today to convert their land assets into profit. There is clearly little latent demand in the system. The plan looks forward 20 years, but surely the demand needs to be demonstrated <u>now</u> in order to release Green Belt?</p> <p>The Government suggests the established method of calculation is ‘particularly complex and lacks transparency’; recommending a new, standard formula. Given the intrinsic character and</p>

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				<p>natural beauty of the targeted Green Belt and the poor correlation of existing data, we must await the proposed standard method for calculation <u>before</u> giving planning consent. Delaying planning permission to build on Green Belt, pending improved forecasts of the need for new dwellings is surely a minimum legal requirement? Section 6.12 states that, ‘much of the readily available brownfield land has now been developed’. I am aware of brownfield sites and abandoned properties in the area that have not been developed. Surely, the minimum requirement before building on Green Belt is a survey of <u>all</u> brownfield sites in the Wyre Forest, providing a comprehensive list identifying the ownership and status of that land and an action plan to build on it.</p> <p><b>Annex 4;</b> With respect to sustainability, the local plan suggests safeguarding agricultural land. However, the Amec review is misleading, describing the character as having ‘average quality’ when the pictures here demonstrate it is high quality. The review describes the withdrawal of active land management through poor crop growth. It would be easy to understand land management withdrawal given the speculation over the future of the land and its ownership (now by a development company), precluding a coherent long-term farming plan. The position has been exacerbated by the 2007 outbreak of foot and mouth in the locality, forcing local farmers to move away and reducing demand from local fields for animal feed. In practice however, the reverse is true. My photos show healthy crops, demonstrating that local farmers value the opportunity to rent from the developer to farm! Recently, crops including wheat, barley, carrots, spring onions, potatoes etc, have been grown as well as occasionally encouraging pollination by use of poppy and other wild flowers. My knowledge of the fields covers 30 years. Section 7.9 explains that the ‘Amec’ studies formed a key part of the evidence base for policy options and decisions. Has testimony been sought from any of the farmers that have farmed there? Section 6 outlines the importance of promoting local food production. This has even greater importance post-Brexit. Greater attention is being paid to the number of miles travelled by food and the contribution this makes to global warming. The region can ill afford the loss of agricultural land.</p> <p><b>Annex 5;</b> A 2014 Government press release outlined the importance of wildlife corridors. The</p>

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				<p>area is blessed with sites of special scientific interest (e.g. Wilden Marsh) and nature reserves (Spennells Valley Local Nature Reserve). Numerous rare species would benefit from the use of natural hedgerows and open fields to provide a varied habitat and a corridor to extend their range.</p> <p><b>Annex 6;</b> Everyone understands the difficult choices Councils make when balancing infrastructure spend against other pressing needs in times of austerity. We were led to believe that the residential housing on Hawfinch Rise would be reserved to provide extra space for the much-needed expansion of the school. The reality is that development of the fields with the inevitable failure to provide the required infrastructure will produce a nightmare scenario for the new residents in terms of traffic congestion and facilities.</p> <p>I understand that the Council wrestles with conflicting needs on a tight budget, but the level of justification required before building, especially on Green Belt needs to be addressed urgently and much more rigorously.</p>
	<a href="#">LPP04737</a>	Option A	Object	Do I prefer Option A or B? The immediate answer is neither. The amount of land taken up by these two proposals especially the core sites is too extreme. The amount of additional infrastructure required for schools, health facilities etc. looks from this perspective to be too costly and will never be completed. Where are these additional schools or Form Entry (not sure what this means) to be built within this new development without compromising all the other factors such as green infrastructure, transport, water and sewage etc? What about the unique place and all the other considerations?
	<a href="#">LPP04594</a>	Option A	Object	The impact on the Green Belt and the size of the proposed “Super Estate” is huge. For anyone who knows the area, in particular the existing Spennells estate, you will appreciate how big this proposed development is.
	<a href="#">LPP04331</a>	Option A	Object	Option A infers the inclusion of an Eastern Relief road; I believe that this is being used as a dangling carrot to encourage people to support this option. There is no evidence that in reality the relief road is any more likely to happen with this option. Section 106 moneys will be used to

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				ensure affordable housing (which they should) within said scheme, there will not be any left for relief roads.
	<a href="#">LPP04632</a>	Option A	Object	<p>I have tried to read and absorb the contents of the document and have only being partially successful. What I have seen is a looming disaster for quality of life in this beautiful area. The plan is some kind of a patch to a problem that should be fixed at source. In allowing unchecked immigration, successive governments have caused this country to become massively overpopulated and as a consequence, ordinary people are having to endure constant development, loss of open spaces and food production areas (needed all the more with the ever increasing population) and more and more traffic congestion and its attendant pollution, which in turn require more roads and bypasses to be built. The problem must be addressed at source by national government who should be severely pressured by local authorities on residents' behalf.</p> <p>As for the plans themselves, there are too many individual components to be able to comment on them all. If I had to express an opinion, then I would say that option A is not my preferred option, but that is not to say that the other option is acceptable either - it is just the lesser of two evils.</p> <p>I realise that the production of this plan has been imposed by national government, but I implore the local council to act now in resisting the move to just keep building in an attempt to solve a problem that could easily be fixed at source, i.e. stop adding to the problem of an already overpopulated and overcrowded island immediately.</p>
	<a href="#">LPP04301</a>	Option A	Object	The Local Plan Review document is flawed and biased towards Option A. The options only provide two sites whereby additional schools would be assured. The redevelopment of Kidderminster train station is questionable. The Capital Portfolio Fund and the £10 million Development Loan does not go hand in hand with proposed Option A, or any agreement for Kidderminster to take any overspill from Birmingham. The proposed Option A will just provide a

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				<p>commuter estate and therefore secure the Bypass.</p> <p>The downgrading of Kidderminster Hospital is just one example of how the town amenities are not suitable for the existing residents let alone any newcomers.</p> <p>Option A will bring a commuter estate encouraging people to work and spend outside of Kidderminster when in fact the local economy needs a boost.</p>
	<a href="#">LPP04377</a>	Option A	Object	I am strongly opposed to the Options suggested. The district Council is not trying hard enough to use the brownfield sites that are available.
	<a href="#">LPP04436</a>	Option A	Object	<p>I am writing to express my objections to the local plan review preferred options consultation.</p> <p>They are as follows-</p> <ul style="list-style-type: none"> <li>• The Councils own statistics show that there are enough brown fields/other capability to fulfil government targets for ten more years. The proposal is for five years (beginning in 2019 will run until seven years from now), and as such no release of Green Belt land will be necessary during this period- “The Green Belt is 13% of the land. We can solve this crisis without having to take huge tracts out of the Green Belt,” the housing minister, Gavin Barwell, said. “They can take land out of the Green Belt in exceptional circumstances but they should have looked at every other alternative first,” he said, including building on brownfield land, releasing surplus government land, increasing the density of projects in towns and cities, or partnering with neighbouring Councils.</li> <li>• Whilst I appreciate that there are difficulties in attracting building companies to build upon more difficult sites, allowing the release of more lucrative ‘easier option’ sites will only exacerbate this problem. It may be argued that the Council can negotiate a ‘tie in’ for companies to build upon brownfield/other sites alongside ‘easier’ options, they will then be able to pay a levy to the Council rather than completing these obligations. The Council will not, however, be obliged to spend these resources in Kidderminster/to</li> </ul>

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				<p>improve local housing stock that utilises brownfield/other sites.</p> <ul style="list-style-type: none"> <li>The preferred option A removes more than twice the amount of Green Belt from our local area than option B (2% as opposed to the Government’s nation benchmark of 1%). This option is purported to allow for new road networks and supporting, but as no information is available, it must be assumed that this is a desire rather than an absolute fact. If one of the two options is to be adopted then option B is the most appropriate, as it will simply extend an already existing new development area with its own direct transport links to both the Wolverhampton and Stourbridge main roads.</li> <li>In light of the above points my vote as a constituent of this area is that- Firstly, that both plans A and B are unnecessary and unacceptable, but that secondly IF one must be adopted, then it should be plan B.</li> </ul>
	<a href="#">LPP04445</a>	Option A	Object	<p>Please note my objections to both Option A and Option B of the Local Plan Preferred options.</p> <p>I don't think it's fair to offer a Plan A and B which both involve destroying our local Green Belt which is so close to many of our residents' hearts. Green space is important for emotional and physical wellbeing. As a nation, we grow less than two-thirds of our own food. Now, more than ever, we need to avoid unnecessarily losing our countryside. Why can't we utilise our brownfield land instead of destroying our precious countryside, which is home to rare and endangered wildlife like the Corn Bunting, Long-eared Bat and a Horseshoe Bat.</p> <p>I have lived in Kidderminster many years and have always valued the local Green Belt. It played a huge part in my childhood wellbeing and I have very fond memories of going on nature walks with my family and playing with my friends. Our Green spaces should be protected as once they are gone they are gone for good.</p> <ul style="list-style-type: none"> <li>Green spaces and farmland are important habitats for wildlife, some species of which are rare/endangered i.e. the Corn Bunting.</li> <li>In our efforts to tackle the housing crisis, suitable brownfield land and not Green Belt</li> </ul>

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				<p>should be the priority. This should be utilised first and foremost, before any Green Belt land is even touched. What about the derelict and vandalised Sion Hill school site? There are places like this all over which have not been utilised after about a decade and yet you propose to destroy our Green Belt.</p> <ul style="list-style-type: none"> <li>• The amount of housing you propose to build is completely unnecessary and based on figures that apply to our nation as a whole and not the local area's needs. You have also rounded figures up. This is completely unacceptable and one can only assume this has been done to make money first and foremost, and not with the wellbeing of our local people in mind.</li> <li>• Our local government has only closed schools over the years and you now want to move thousands more people into our town. Where will they go to school? Where will they go to the doctors, or the hospital? How will our Police and Fire services cope with the increase? There already aren't enough GPs for the town's population and it's already difficult enough to get a doctor's appointment. Kidderminster Hospital has been downgraded.</li> <li>• I don't feel that this proposal has been purposely kept quiet- I only found out about it from a family member who had a leaflet through her door. I didn't have any warning whatsoever and neither did several other people I know. I also believe it has been designed in a way as to pit 2 parts of our town against each other, with one side hoping you will use Option A and the other wanting Option B with no option available to people who don't want any Green Belt used. Is this not an option?</li> <li>• Houses on the Silverwoods development remain unsold; why is there now a need for such massive development when there appears to be insufficient demand already? This huge building project was supposed to solve Kidderminster's housing needs for the foreseeable future. Once again this contradicts decisions made by the Planners. Was the mistake then or now?</li> <li>• There aren't enough jobs in the area to support this huge influx of people. This will render new developments commuter ghost towns and increase traffic on main roads.</li> </ul> <p>To summarise, I do not agree with Plan A or Plan B. I believe there is no need for such urban</p>

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				expansion.
	<a href="#">LPP04452</a>	Option A	Object	<p>In the draft plan there are aspirations to redress the imbalance in the age of the population, attract more business and jobs. Destroying the Green Belt to build houses does nothing to address these aspects of Kidderminster’s future. The idea that almost 6000 houses are required when clearly the population of Kidderminster is not growing at a significant rate seems like a grossly inflated figure. The 2.7% increase in the last two years is almost certainly the effect of increased immigration from Europe, which may reduce as some return to their own countries following Brexit.</p> <p><b>Average age and jobs:</b> To lower the average age of the population it is necessary to attract young people to the town for which you need jobs and cheap housing. In fact the biggest problem facing youngsters today throughout the UK is that they can’t afford to get on the housing ladder. Just building new houses on Green Belt land will not help. A potential solution to the housing problem would be to have the derelict and unoccupied properties, of which there are many, in the town converted to flats. This may require the use of compulsory purchase orders, which must be within the power of the Council. The resultant dwellings, would be cheaper to buy or rent, would attract young people and would help to revive the town centre. The proposed use of the Glades site for retail should be changed to more flats for the same reason. Cheap housing will not be found on Spennells Green Belt. Young people will be the people to develop new businesses; older people with established careers will be reluctant to take risks.</p> <p><b>Green Belt effect:</b> Building houses on green field sites to the east of Kidderminster could have an adverse effect on the average age of the population. Any developer building on that land will want to build 4 &amp; 5 bed houses not only to increase his revenue but also to recover the cost of the land he has purchased. They will not want to provide affordable housing at the 30% level. This will attract commuters from Birmingham and Worcester. And will exacerbate the commuting problem.</p> <p><b>My objection:</b> I am strongly opposed to both of your preferred options. I believe that developing</p>



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				cheap flats for younger people will balance the ageing problem and help to create new businesses. I believe that to meet the need for affordable housing all brownfield sites in the town should be redeveloped first. No Green Belt land should be built on until the redevelopment of the town centre has been completed and all flats occupied.
	<a href="#">LPPO3215</a>	Option A	Object	<p>I would like to highlight my objection to WFDCs plan to sacrifice large swathes of Green Belt land around Kidderminster for housing development and support neither option A or B. The reason for this being that I believe population growth within the region is static due to a reduction in job opportunities in the area.</p> <p>The Green Belt land around Kidderminster is easily accessed by local people and is well used by all members of the community providing a safe space to exercise both the mind and body. The loss of such land will in addition have a detrimental effect on wildlife with many protected species such as corn buntings, bats, badgers and many other bird species using this land.</p> <p>If following the use of all brownfield sites there is a true unmet need in the district for housing I would support the integration of small developments of less than 100 houses to be spread across the district on a variety of Green Belt areas so as to reduce the pressure on local infrastructure and services. In addition these areas should be carefully considered to see how they link in to existing public transport methods with the potential for a new park and ride train station to be developed outside of the town.</p>
	<a href="#">LPPO3218</a>	Option A	Object	<p>I opposes Option A:</p> <ul style="list-style-type: none"> <li>• The plan proposes two thirds to three quarters of development centre on Kidderminster and land surrounding it. I consider this to be unfair and disproportionate and there needs to be some choice as to where people can live to encourage more people to stay in the Wyre Forest.</li> <li>• The proposed development is 3 to 4 miles away from the town centre, which has no transport links after 6 pm and will create more traffic getting into the town and out of</li> </ul>

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				<p>the already congested estate roads around Spennells.</p> <ul style="list-style-type: none"> <li>• Kidderminster town centre is very run down. People do not want to live in big soulless estates or shop in the town centre here, but would rather live in the more vibrant and social areas of Stourport, Bewdley and Cookley etc.</li> <li>• The shaping of Option A to justify the relief road to resolve pre-existing transport problems and air quality is not correct. The relief road will not help with air quality in the Horsefair as the majority of traffic to Birmingham from Worcester use the A450 Worcester Road, which should be enhanced and the Bridge raised to accommodate the larger vehicles instead of creating a very expensive and unneeded additional road basically running parallel to this.</li> <li>• I challenge the validity of the Green Belt Review and the consequences this has, in respect of Option A for the fields between Spennells and Summerfield. These fields have a massive impact upon social amenity, biodiversity and the integrity and identity of the hamlets of Summerfield and Stone. There are many rare bird and mammal species in these fields (e.g. Bats, Badgers, Linnets and Corn Buntings), and are used regularly for exercise and health and wellbeing by residents, as well as visitors to the local area.</li> </ul>
	<a href="#">LPPO3263</a>	Option A	Object	<p>I object to A proposals as you are putting forward an option to build on prime farming land, which has very diverse wildlife on it, (including protected species such as bats, badgers and great crested newts). Also concentrating too many houses on the east of Kidderminster, overwhelming the existing communities which could cause social problems further down the line.</p> <p>The schools and Doctors to the east of Kidderminster are already at capacity.</p>
	<a href="#">LPPO3274</a>	Option A	Object	<p>I object to plan A and “Core sites”.</p>
	<a href="#">LPPO3371</a>	Option A	Object	<ul style="list-style-type: none"> <li>• Objects to option A - prefers option B.</li> <li>• Consultants are incorrect stating there is no significant wildlife interest in Spennells fields - they are habitats to many animals.</li> <li>• Option B would not endanger these habitats.</li> </ul>

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				<ul style="list-style-type: none"> <li>• Option B spreads smaller, more desirable development throughout Wyre Forest.</li> <li>• Local infrastructure demands will be best served in option B - especially schooling, transport and public transport as it will be spread around the district.</li> <li>• Stone parish is unfairly targeted in option A for housing and a relief road.</li> <li>• Option A does not address the need for affordable homes as prices will be too high for local residents as it's a low income area.</li> <li>• The loss of Green Belt, arable land and hedgerows should not be focused on one main area - option B uses less Green Belt.</li> <li>• The draft plan is in support of option A as it will provide fund to the relief road - the need for which has no evidence.</li> </ul>
	<a href="#">LPPO3408</a>	Option A	Object	<ul style="list-style-type: none"> <li>• Prefers option B over option A.</li> <li>• Green Belt land should only be used as a last resort.</li> <li>• Disconnect between plans and town centre regeneration/transport infrastructure.</li> <li>• The Glades used to be in walking distance but now they aren't - these plans will repeat the decision causing more cars on the road.</li> </ul>
	<a href="#">LPPO3420</a>	Option A	Object	<ol style="list-style-type: none"> <li>1. Increased traffic, noise and pollution from exhaust fumes with resulting affect on existing resident's health.</li> <li>2. Removal of Green Belt amenity currently used by existing residents for walking, cycling, dog walking or horse riding.</li> <li>3. Increased pressure on local services - schools. GPs and hospital. It is currently impossible to get an appointment at Church Street GP practice.</li> <li>4. Loss of wildlife habitat.</li> <li>5. Loss of productive agricultural land.</li> <li>6. Wyre Forest has an ageing population who do not require thousands of starter homes built for commuters.</li> <li>7. Commuters parking in neighbouring streets to the railway, rather than paying for car parking, are already a nuisance. Roads are already grid locked. Farfield is as a result of all</li> </ol>

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				day commuter car parking a one way road.
	<a href="#">LPPO3564</a>	Option A	Object	<p>I drive around Kidderminster and see so many derelict areas and unused building, I cannot comprehend how using Green Belt is appropriate. Should we not be using brownfield sites, derelict buildings etc there are enough factories in Kidderminster or is this too expensive for the developers and they are looking for a cheaper option?</p> <p>We have to protect our Green Belt as concerns over increasing mental health are on the news every day. Our schools are full, we will have even more traffic even with a relief road, additional pollution, increased pressure on doctors and NHS and urban sprawl.</p> <p>The fields on Stanklyn are a haven for wildlife – I go there at 6am for a walk – the swallows are flying over the top of the grasses and I can hear skylarks – it is heavenly – what will happen to their habitat - are we trying to create a horrendous urban sprawl.</p>
	<a href="#">LPPO3573</a>	Spennells	Object	<p>In Option A it is suggested that around 1700 dwellings be built. This is far in excess of the actual growth of the local population, which has remained relatively stable since 1991. Recent job losses suggest there is unlikely to be large demand for new dwellings.</p> <p>Option A will take out valuable, much needed, agricultural land if around 1700 dwellings are built on it. This will lead to less productive land being available to Britain. Wildlife habitat will also be lost when the hedgerows are taken out. The common toad, whose numbers are declining rapidly, will lose its migration routes around the Spennells Valley Nature Reserve.</p> <p>Option A would put great pressure on the existing busy roads. The future 3700 residents are unlikely to be helped by an Eastern Relief Road. Spennells Valley Road links the A449 and the A448 and an increased volume of traffic would result in an even slower flow at peak times, leading to increased pollution.</p>

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				<p>Schools: These have only a very limited number of places which only possibly might still exist for new residents' children.</p> <p>Spennells community centre no longer exists as it was all that was available for the school to expand to furnish places for the existing pupils on Spennells.</p> <p>Spennells estate no longer has a community centre. This means there is nowhere for existing residents to meet or pursue leisure activities.</p> <p>Shops: These are next to the school. There are five "shops" and two takeaways on Spennells. The volume of traffic and difficulties in parking around these and the school at peak times are already great. Pollution levels will be greatly increased with 1700 more dwellings. Do we want increased pollution around our schools?</p>
	<a href="#">LPPO3588</a>	Option A	Object	<ol style="list-style-type: none"> <li>1) The lack of concentration on potential Brown Field Sites rather than the easy option of allowing building on Green Belt.</li> <li>2) You have already identified such Brown Field Sites in your report "Wyre Forest District Strategic Housing and Economic Land Availability Assessment 2016"</li> <li>3) It is pleasing that areas such as the old Lea Castle Hospital have been identified and these surely are areas to use first for house building.</li> <li>4) There is no concentration or even identified concern that sites where building permission has been granted are being left and no movement has yet been made to build on such sites, viz:- the land adjacent to the new Tesco in Stourport.</li> <li>5) This loss of Green Belt land is very worrying especially due to the impending Brexit situation. We are already only 50% self sufficient with food production in England and a continued loss of good agricultural land, which is that backing onto Spennells, could have serious repercussions for our food production. Once the land is built upon, the situation could not be reversed.</li> </ol>

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Company / Organisation	Response No	Para / Policy	Type of Response	Summary of Response
	<a href="#">LPPO3593</a>	Option A	Object	<ul style="list-style-type: none"> <li>• Objects to option A.</li> <li>• Would have negative impact on local area.</li> <li>• Would affect local environment and wildlife.</li> <li>• Increase traffic congestion and risks.</li> <li>• Diminishes the identity of Summerfield and Kidderminster - creates urban sprawl.</li> <li>• Have we used all available brownfield sites across the district?</li> <li>• Selected easier solutions for developers.</li> <li>• The council needs to re-examine options to establish a more balanced plan to protect its distinct and attractive identity for further generations.</li> </ul>
	<a href="#">LPPO3664</a>	Option A	Object	<p>OPTION A is opposed and <u>preference is for OPTION B</u> for the following reasons:</p> <ul style="list-style-type: none"> <li>• The housing need outlined is incorrect</li> <li>• You have not provided enough evidence for transport support. The proposed Eastern By pass is not proposed in enough detail in the plan. There are no maps, volume of traffic proposed, entry or exit zones.</li> <li>• If Option A is chosen, there will be negative impact on: <ul style="list-style-type: none"> <li>○ Health</li> <li>○ Well being</li> <li>○ Mental Health</li> <li>○ Safety</li> <li>○ Road ; congestion</li> <li>○ Distinctiveness , region characteristics</li> <li>○ Transport</li> <li>○ Crime, social behaviour</li> <li>○ Wildlife</li> <li>○ Schools</li> <li>○ Medical centres, Doctors hospitals.</li> </ul> </li> <li>• Councillor Ian Hardiman confirmed that the Council had brownfield sites for 3000</li> </ul>

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Company / Organisation	Response No	Para / Policy	Type of Response	Summary of Response
				<p>dwelling so use of Green Belt should be a last resort.</p> <p>The benefits of allowing easier delivery of school provision and the option of an Eastern Relief Road do not outweigh the disadvantage caused by the large-scale of expansion to the east of Kidderminster that would be needed.</p> <p>Option A:</p> <ul style="list-style-type: none"> <li>• Will not provide the employment need as this will make Kidderminster a soulless commuter town.</li> <li>• Will produce a housing sprawl and will not generate growth to Kidderminster. One town will merge into another.</li> <li>• Current employment land lies vacant and unused on Worcester road since built what evidence is there that more is required and that it will be filled?</li> <li>• Infrastructure: The by-pass will not add any growth to Kidderminster and will serve as a route to by-pass the town. The eastern by pass will be opposed as it was previously. What evidence is there that this road will enhance the community? Where will the Eastern by pass end? Presume on A456 where this will add to already heavy congestion. It will cause congestion, traffic, health and asthma problems, and destroy much more than green field and Green Belt sites.</li> </ul> <p>You have not mentioned development to secondary schools.</p>
	<a href="#">LPPO3780</a>	Option A	Object	Option A unacceptable.
	<a href="#">LPPO3795</a>	Option A	Object	<p><b><u>OBJECTION TO ‘OPTION A’ AND REMOVAL OF LAND FROM GREEN BELT STATUS</u></b></p> <p>Offering A or Option B is a divisive and dangerous tactic — one that splits communities and gives way to resentment. Who am I to say that the Green Belt in Kidderminster is more important than the Green Belt in Stourport? If the projected growth figures are accurately calculated it will be</p>

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				unnecessary to develop on any Green Belt land. If WFDC harnessed the passion raised by this consultation and worked with residents then maybe we may achieve something lasting and worthwhile.
	<a href="#">LPP03802</a>	Option A	Object	I object to the Council's strategy as evidence/analysis shows the scale is unnecessary. I do not support Option A inc the Kidderminster Eastern Relief Road which, if built, would bypass the town centre and worsen traffic problems along the A449
	<a href="#">LPP04147</a>	Option A	Object	I do not agree with any option that builds on Green Belt.
	<a href="#">LPP04156</a>	Option A	Object	<p>I do not support options A. I would urge you to consider the requirements of local residents, rather than those of large developers in this plan.</p> <p>As well as the implications of destroying the local countryside, which is well used and loved by the local community. Have a look at brownfield sites first.</p> <p>The Kidderminster Eastern relief road appears to take traffic from one busy road and feed it into another!</p> <p>A wider-scale review of the traffic round the Kidderminster area is needed, not merely an additional road.</p>
	<a href="#">LPP04230</a>	Option A	Object	OPTION A IS NOT AN OPTION FOR ME ,
	<a href="#">LPP02357</a>	Option A	Support	<p>Support Option A.</p> <p>Additional housing requires more investment in infrastructure/employment/communication links and new housing to the north and east of Kidderminster could attract businesses.</p> <p>Housing west of the River Severn, with no additional road improvements, will increase traffic congestion/pollution/air quality in Stourport/Bewdley.</p>



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	<a href="#">LPPO2612</a>	Option A	Support	We wholeheartedly support the councils preferred option A, because building the majority of the houses on the Spennells and Lea Castle would be the most attractive for those people who choose to live in the Wyre Forest but their employment is within the surrounding towns and cities.
	<a href="#">LPPO2614</a>	Option A	Support	I attended the consultation meeting at Areley Kings Village Hall last Wednesday and this is my response. I am totally in favour of option A for the new housing.  Your development plan states that you want to develop the role of Kidderminster as the main town for the area. In that case large areas of new residential development should take place there, particularly as a new Eastern Relief road is being proposed which would benefit everyone in the Wyre Forest. It would help to relieve the congestion within central Kidderminster and be convenient for residents on the new estate who commute to Birmingham and the Black Country. Also new schools are proposed for the extension to the Spennells estate. This must be more advantageous than trying to expand multiple schools across Wyre Forest if the residential development is widely dispersed.
	<a href="#">LPPO2768</a>	Option A	Support	Option A preferable.
	<a href="#">LPPO2955</a>	Option A	Support	It seems that Option A would include new infrastructure whereas Option B will not include any.
	<a href="#">LPPO2968</a>	Option A	Support	The current and planned infrastructure in Kidderminster is more suited to the housing increase. The development would complement the recent improvements such as the town centre as well as the planned eastern gateway.  The road system in Stourport struggles currently so an increase in traffic would not be helpful to the town itself or the residents.
	<a href="#">LPPO2995</a>	Option A	Support	In general I am in support of Option A. I am in favour of keeping new homes near to potential employment site, schools and services whenever possible to reduce the travelling and pollution.  Concentrating new housing will make it easier to provide new schools places, health services and

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				leisure activities. The advantage of, and benefits from, constructing a link road to the east of Kidderminster, is self evident.
Stourport on Severn Town Council	<a href="#">LPP01257</a>	Option A	Support	<p>The Council met on 1<sup>st</sup> August 2017 and wishes for Wyre Forest District Council to proceed with Option A and not Option B.</p> <p>Option B does not provide for any highway or other infrastructure improvements within and around Stourport. Option A proposes a new road which would link the A449 with the A448 which would provide new infrastructure to support the proposed new development around the Spennells Estate.</p>
Stourport on Severn Civic Society	<a href="#">LPP01298</a>	Option A	Support	<p>Overall we prefer Option A as we feel the existing and proposed infrastructure will support development on the scale proposed.</p> <p>Kidderminster is already on the national rail network with access to Birmingham and beyond. The proposed Eastern Bypass will facilitate road traffic in the area- locally and beyond.</p> <p>Stourport High School is at full capacity whereas there is capacity within Kidderminster High Schools.</p>
	<a href="#">LPP01661</a>	Option A	Support	I wish to support option A as it is logical from a geographic point of view, would support the proposed by pass and would be straightforward in delivering County and District services.
	<a href="#">LPP01662</a>	Option A	Support	<p>I would like to offer my support for option A. it makes so much more sense than option B because it will come with inbuilt infrastructure and a bypass road to avoid the town centre.</p> <p>Option B spreads out the houses and therefore puts the strain on local services such as schools and doctors. Placing 600 houses on the Areley Kings side of Stourport would create gridlock on the bridge over the river Severn, and the town centre,</p> <p>Option A is the only way forward.</p>

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Company / Organisation	Response No	Para / Policy	Type of Response	Summary of Response
Wyre Forest Community Housing	<a href="#">LPP01681</a>	Option A	Support	We are in favour of the delivery of more homes and particularly more affordable homes in the District. Having considered the District Council’s Local Plan Review Document, we do agree with your assertion that larger scale sites are more likely to enable the viable provision of affordable housing.  Therefore, we support Option A.
	<a href="#">LPP01765</a>	Option A	Support	Option A Support-Better suited road system.
Rock Parish Council	<a href="#">LPP01161</a>	Option A	Support	Rock Parish Council supports Option A.
	<a href="#">LPP0595</a>	Option A	Support	I prefer option A
	<a href="#">LPP0676</a>	Option A	Support	I prefer option A as more flexible and would allow the Eastern Relief Road.  With all consultations much is unknown and needs a developer to implement it.  Apart from Sugar beet factory seen little action e.g. Bromsgrove Street, Sladen School Site, Horsefair, Improvements between Town Centre & Railway Station.
	<a href="#">LPP0757</a>	Option A	Support	Option A would be preferable as it would allow for desperately needed Eastern Relief Road for Kidderminster.
	<a href="#">LPP0131</a>	Option A	Support	Broadly support Plan A as less dispersed, makes use of some existing infrastructure e.g. Lea Castle site, larger development could more cost effectively support its own services; shops, health etc. Concerns about traffic access from this area to Birmingham Road and people using Hurcott Lane which is narrow and already a rat run. Without mitigating routes this could cause problems.
	<a href="#">LPP0174</a>	Option A	Support	I support the Kidderminster Relief road, and development to the East of Kidderminster.
	<a href="#">LPP0337</a>	Option A	Support	I prefer Plan A as this area already has services i.e. medical centre, schools, roads. Plan B in

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				Stourport does not have sufficient roads, medical centre or schools to cope with another 1,000 houses approx. Dunley Road already has traffic queuing. The bus service is awful. Also we have no leisure centre as it has gone to Kidderminster.
	<a href="#">LPP03098</a>	Option A	Support	Apart from the 'Land off Highclere site (BR/BE/6)', I am in favour of Option A.
	<a href="#">LPP03079</a>	Option A	Support	The Parish Council of Kidderminster Foreign wish to generally give support to option A to enable the creation of an Eastern relief road for Kidderminster.
	<a href="#">LPP03179</a>	Option A	Support	I would support Option A in the light of the benefits and the less negative effects on education etc.
	<a href="#">LPP04659</a>	Option A	Support	Given that there are two preferred options, it would, in my opinion, be best suited to develop the sites at Option A areas within the Lea Castle/ Spennells/ Stanklyn areas of Kidderminster. Although this option does mean developing on a slightly higher % of Green Belt land, it does mean that development is contained within one area and road networks and infrastructure are already viable and the impact of such developments on the infrastructure would be minimal. Similarly, proposals to build facilities, such as schools and medical centres, specifically for the development would be a much better investment of public money than trying to ensure small, already established schools can cope with the demand of housing developments being built around them. Overall the impact of the building of larger developments is lower as the building works are confined to one location.
	<a href="#">LPP04596</a>	Option A	Support	The obvious option is the East of Kidderminster Sustainable Urban Extension with the very important and essential benefits that an Eastern Relief Road for Kidderminster would bring for the whole of Wyre Forest.  With the financial incentives available from the developers who develop these sites, it surely makes sense to concentrate them all in one area, where the incentives are large enough to make a difference, i.e. new schools, road improvement and community facilities rather than spread them throughout the District, thereby diluting the effectiveness of these financial incentives.

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	<a href="#">LPP04629</a>	Option A	Support	I realise that a plan is required and putting it into action may take years. Firstly I would like to say that in general terms I would support the core housing sites to the east of Kidderminster together with the option A housing sites. These seem to have been considered more thoroughly in that it provides for education and other community facilities along with a relief road to provide for the additional traffic and provide assistance with congestion on the current ring road.
	<a href="#">LPP04235</a>	Option A	Support	Option A is the best and only way forward, the only logical solution
	<a href="#">LPP04474</a>	Option A	Support	These are THREE good reasons to decline the Stourport-on-Severn proposal and choose the Kidderminster option which has given more attention to the additional infrastructure requirements of the area.
	<a href="#">LPP03231</a>	Option A	Support	<p>It seems logical to base houses closer to employment hubs, major transport links (rail &amp; road) and where there's potential for increased school provision. There's the added benefit of the Eastern Relief Road which should help with the current well-known traffic problems around the roads in Kidderminster (A449, Hoobrook, the Horsefair etc).</p> <p>Improvement to these traffic problems should also help to improve/stabilise the current air quality issues.</p> <p>The benefits of Option A outweigh the disadvantages as long as the new infrastructure is built/developed at the same time as the housing to make it a sustainable development.</p> <p>There will be an additional economic benefit to the town as a whole, new houses mean new people who will shop, eat and spend their leisure time and money in Kidderminster.</p>
	<a href="#">LPP03273</a>	Option A	Support	Prefer Option A
	<a href="#">LPP03293</a>	Option A	Support	Overall the features of Option A, together with the existing infrastructure and facilities of Kidderminster and the area to the east of the town, would more appropriate to better the

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				development on the scale proposed.
	<a href="#">LPP03358</a>	Option A	Support	<p>Please find below my proposal in favour of Option A. The reasoning to support this Option relies solely on its viability with regard to existing and proposed infrastructure.</p> <p>Transport links, accessibility, and the provision of services including educational have been positively accounted for in the proposed Option A. The Relief Road relinquishes current pressures on Kidderminster town traffic and the A449, whilst also ensuring easy access to the M5 and Birmingham. Most importantly, it enables direct, easy access to Option A's two concentrated urban developments.</p> <p>These two sites can enjoy convenient transport links and all that the main town has to offer, including existing educational establishments and the higher than required employment opportunities. The utilisation of the sites minimises aesthetic disruption beyond two concentrated areas. Adherence to existing national and local authority affordable housing policies can be realised when Option A is adopted.</p> <p>It seems nonsensical that Option B can be considered, especially after residential concerns noted at 2.10, Local Plan Review – issues which were echoed by planning officers in the recent refusal of planning application for 125 homes at Astley Cross. Issues of site suitability and the risk to the nature and character of the landscape only stand to be amplified by Option B's mapped locations. It is acknowledged in the Local Plan Review that more green space would have to be utilised in Option B, reducing the likelihood of adherence to Green Infrastructure policies.</p> <p>With regard to site suitability, it begs the question whether local Housing Policies, Adopted Development Plans, the Adopted Wyre Forest Core Strategy, Adopted Wyre Forest Site Allocations amongst others have been seriously considered in mapping Option B.</p> <p>It is not just the distinctive countryside within the District that risks adverse harm from Option B development, it is the already stretched infrastructure. With goals noted in the Local Plan Review</p>

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				<p>to limit the need for travel and ensure sustainable alternatives are available, it must be noted that in Areley Kings for example, there are extremely limited public transport options. This is typical of the District outside of the main towns.</p> <p>Employment opportunities are noted in the Option comparisons to be much less than Option A, and it is disappointing the Local Plan Review has continued to fail to remedy the relationship between land availability, housing completions and employment opportunities.</p> <p>With such limited employment options within this rural corner of the District, use of a car is somewhat imperative. Road users within this vicinity currently face the dangers of on-road parking, and increasingly a blatant disregard for speed limits by drivers - issues which would be exacerbated with greater road users.</p> <p>Accessibility to amenities is limited to the river crossing at Stourport-on-Severn which already faces extreme congestion, again acknowledged in the refusal of application noted above.</p> <p>Whilst Option A accounts for transportation options, sustainable alternatives and seeks to minimise the need for travel in its proximity to amenities, it must be remembered that there is no way of dispersing this additional pressure to infrastructure if Option B were to be adopted.</p> <p>The severity of the shortcomings of the existing infrastructure which would be pressurised further by Option B with no remedies offered, makes Option B prohibitively detrimental to the District for many reasons, only a few of which have been noted above.</p>
	<a href="#">LPPO3429</a>	Option A	Support	I wish to register my support for plan A.
	<a href="#">LPPO3452</a>	Option A	Support	Support Options A.
	<a href="#">LPPO3495</a>	Option A	Support	We support the basic thrust of the proposals including the limited use of Green Belt land, the need to ensure adequate provision of affordable housing and appropriately sited provision for

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				<p>the elderly and single occupation.</p> <p>Any proposals to reduce traffic through town centres are to be welcomed. Pedestrianised zones in Kidderminster have been a great improvement and should be extended wherever possible.</p> <p>These measures would help to improve air quality.</p>
	<a href="#">LPPO3517</a>	Option A	Support	I support option A as I believe this area could support and increase in population BUT brown belt land must be sort in preference to Green Belt land at the Spennells site.
	<a href="#">LPPO3527</a>	Option A	Support	<p><b>Option A</b></p> <ol style="list-style-type: none"> <li>1. We agree it is very important to preserve the wildlife corridor.</li> <li>2. Housing suggested in Option A would be closer to employment and education opportunities, therefore requiring less travel.</li> <li>3. The proposed new Kidderminster Eastern relief road would be very welcome, easing congestion in Kidderminster. This would have the added benefit of improving travel to Worcester, Birmingham and M5 etc without having to go via the town centre.</li> <li>4. Any new houses in these areas would benefit from this and also the added benefit of easy access to the two mainline railway stations at Kidderminster and Blakedown.</li> </ol>
	<a href="#">LPPO3533</a>	Option A	Support	I think Option A is preferable as it includes the relief road which surely is desperately needed and suggests better school provision.
	<a href="#">LPPO3535</a>	Option A	Support	My feelings regarding the proposed local plan consultation are that WFDC has already made their choice and that this consultation is just a formality they have to go through, based on the fact that there are only going to be infrastructural improvements done to option a this is the one id prefer, id also like it noted that should any further plans for housing be made in Stourport that none is allowed without the developer doing something to improve the roads and local facilities before any permission is granted.



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	<a href="#">LPP03582</a>	Option A	Support	Our favoured option is A because they can get the roads changes. Stourport is getting none.
	<a href="#">LPP03585</a>	Option A	Support	Support Option A
	<a href="#">LPP03606</a>	Option A	Support	Option A preferred choice.
	<a href="#">LPP03656</a>	Option A	Support	Support option A.
	<a href="#">LPP03695</a>	Option A	Support	<p><b>Option A</b></p> <p>Proposes significant new infrastructure in the form of a new road, The Eastern Relief Road, improved access to Kidderminster Railway Station and links to the national network. This will have the advantage of reducing traffic congestion in Kidderminster town centre and nearby estates as well as allowing easy access to the economic powerhouse of Birmingham where many well paid jobs are to be found.</p> <p>It also ensures that there will be sufficient school places for the new residents.</p> <p>Although the Lea Castle site lies within the designated Green Belt this has previously been built upon and in its current derelict state is an eyesore and a blot upon the landscape. Development here would only be an improvement.</p> <p>Although it is understandable that many of the residents affected by option A will be deeply unhappy by the proposals this is clearly to be preferred to Option B as the new infrastructure and proximity to the economic opportunities of Birmingham and the Black Country will bring many advantages to the district as a whole.</p>
	<a href="#">LPP03709</a>	Option A	Support	Prefer Option A.
	<a href="#">LPP03728</a>	Option A	Support	Prefer option A
	<a href="#">LPP03730</a>	Option A	Support	In favour of Option A.

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	<a href="#">LPPO3788</a>	Option A	Support	Plan A is the better solution.
	<a href="#">LPPO3797</a>	Option A	Support	Support Option A on good planning grounds as it would result in new and much needed infrastructure improvements, esp. a new Kidderminster Eastern By-Pass.
	<a href="#">LPPO4036</a>	Option A	Support	<ul style="list-style-type: none"> <li>The Kidderminster/Stourport corridor has seen a lot of development in recent years, with several new housing developments. With these have come increases in noise, litter, traffic and road accidents. There is also insufficient parking for local business, with overspill onto side streets and across people’s private driveways. Channelling more traffic via this route under Option B would be greatly distressing for residents and detrimental to their health and (road) safety. Keeping facilities more localise in outlying areas should hopefully prevent this from happening</li> <li>Outlying areas will also benefit from local developments and as such should share in the inconveniences caused. Whilst I understand people’s concerns around loss of Green Belt land, I believe Option A to be far a far more sustainable and common sense approach to development that will spread the strain across the region rather than concentrating it in areas that are already badly affected.</li> </ul>
	<a href="#">LPPO4080</a>	Option A	Support	<p>I believe <b>Option A is the answer to local planning</b>. The new developments improve infrastructures, including a Kidderminster by-pass. Option A is on the best side of Kidderminster, improving road access to Bromsgrove, M5, M40, M6. No bridge access is needed.</p> <p>Option B is piecemeal and involves no road improvements, no access improvements over Stourport-on-Severn bridge which is already running to full, with long tailbacks throughout the year. Through Astley Cross village, it is single lane; with good manners keeps it running. The road leads to the Stourport-on-Severn bridge. Traffic congestion is already a problem over Stourport-on-Severn and Bewdley bridge.</p>
	<a href="#">LPPO4111</a>	Option A	Support	In relation to the two preferred options being put forwards for development it seems that the obvious option to adopt is Option A as opposed to Option B. I believe this to be for the following

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				<p>reasons:</p> <p>Infrastructure - Option A includes for the proposed Eastern Relief Road which will assist in managing the added traffic which will come to our district as part of the increased population. Preferred Option A would also place residents a lot closer to public transport links such as Kidderminster and Blakedown train stations to access larger neighbouring towns and cities such as Worcester and Birmingham.</p> <p>Employment - All proposed new employment opportunities are being shown on the maps as being in the Kidderminster area so it would make sense to build the new housing nearer to these jobs which will therefore point towards Preferred Option A being the better option. Preferred Option A with the proposed Eastern Relief Road will make it easier for residents to get to the new employment opportunities within our region but will also allow easier access to employment opportunities outside of our initial region in areas such as Worcester and Birmingham.</p>
	<a href="#">LPPO4185</a>	Option A	Support	<p>I wholeheartedly agree with proposal A where the potential building is all in one area.</p> <p>Pressure on schools and medical services are localised so new ones can be built rather than cause chaos trying to fit people in to existing 'full' facilities.</p>
	<a href="#">LPPO4214</a>	Option A	Support	<p>Neither Option that you offer is totally consistent and I have concerns about both.</p> <p>Of the 2 on offer Option A would seem to be the lesser of two evils and slightly better aligned but have real additional fears that it presents the dangerous significant prospect of narrowing the essential gap between the West Midlands Conurbation and this part of Worcestershire with its unique history and traditions.</p>
	<a href="#">LPPO3078</a>	Option B	Comment	<p>I prefer Option B as the housing is spread more evenly across the area rather than a large scale expansion of the eastern side of Kidderminster which would cause even worse traffic.</p> <p>It would also impact on the quality of life of people living on Spennells and surrounding areas</p>

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				who have a large area of countryside which they can access and use regularly for exercise.
	<a href="#">LPP03158</a>	Option B	Comment	Prefer option B.  I think there would be more benefits from dispersed strategy.
	<a href="#">LPP03164</a>	Option B	Comment	Prefer option B. More benefits from dispersed strategy.
Land Research & Planning Associates Ltd	<a href="#">LPP0553</a>	Option B	Comment	OPTION B is the preferable one.  Still concerns.
Land Research & Planning Associates Ltd	<a href="#">LPP0555</a>	Option B	Comment	NO.
	<a href="#">LPP0181</a>	Option B	Comment	Option B is preferable because it develops the community as whole not just Kidderminster. Expansion and future proofing of school across the district is more equitable.
	<a href="#">LPP0182</a>	Option B	Comment	No. The infrastructure is only necessary, if the development takes place. Improve existing infrastructure.
CORE11	<a href="#">LPP0242</a>	Option B	Comment	We opt for Option b for the reason that, The core strategy and green infrastructure study 2010 which give prime importance to local green infrastructure and a good place to live, will be weakened if "Option a" is chosen. It would be the start of a brick and cement conurbation that is not sustainable, nor could be reversed.
Homes England	<a href="#">LPP0795</a>	Option B	Comment	Provisional requirement for 6,000 dwellings for the Plan period, with the inclusion of previously developed land, including the former Lea Castle Hospital site, and potential greenfield releases, this leaves a shortfall of 2,360 dwellings.  Option B, a more dispersed strategy, requires a larger number of sites to deliver the additional 2,360 dwellings, including the release of smaller sites within the rural areas. Development in the

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				<p>smaller towns and rural villages would help to support these areas through the provision of additional housing including affordable housing, as well as local jobs through construction, and transferable benefits to those areas provided by the additional population generated by the development. It will also provide choice of location in the housing market, and may deliver housing quicker than focusing on a small number of larger sites.</p>
	<p><a href="#">LPPO623</a></p>	<p>Option B</p>	<p>Comment</p>	<p>Employment opportunities are located throughout the district so makes sense to have the housing also dispersed throughout the district so that local people can live closer to where they work, especially as local transport is poor. The bus service is poor and there are no buses at all at the times needed to get to and from the safari park for early or late shifts. Enabling people to live closer to where they work would reduce traffic congestion and allow the possibility of walking or cycling to work.</p> <p>Option B also helps to preserve open space between Kidderminster and the village of Stone, retaining it as a separate community, and retains green space where the local community can exercise. Option B is much better for wildlife as it maintains access to open countryside for the Spennells nature reserve and the important wildlife site at Captains pool allowing wildlife to move freely and so maintain viable breeding populations.</p> <p>Option B is better than option A although some of the core sites in both options are of concern. The plan to build on the fields up to Hurcott village conflict with the aim to maintain clear space between Kidderminster and surrounding villages. It also puts at risk the SSSI at Hurcott with potential detriment to the wildlife there. I object to the proposal to build on the land currently occupied by Captains and The Lodge on the A448 since that will impact on the wildlife using the pool, the woods and surrounding areas. There are hedgehogs living around the site, a species under considerable pressure. The Captains site would contribute to the congestion on Comberton Road going into Kidderminster and also the Mustow Green roundabout, both currently places where long queues can occur that will not be helped by another 300 houses. The proposed Eastern Relief Road would be unlikely to have any positive impact traffic since it would run between two known bottlenecks and merely move the traffic jams to areas</p>

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				just over the border of Wyre Forest.
Worcestershire Wildlife Trust	<a href="#">LPP01052</a>	Option B	Comment	<p>We note that option B has a reduced impact on Green Belt (by area) which is welcome and would be broadly in line with the Government’s stated position on Green Belt release. However it retains an unacceptable allocation at Wilden Lane and will still lead to considerable impacts on designated sites and wider biodiversity elsewhere. As a result, and considering guidance in the NPPF (in particular biodiversity guidance in paras. 9, 109 and 117), we do not believe that Option B as it is currently set out offers a sustainable solution to development at present. Please see our comments in response to Paragraph 6.54 for more details.</p> <p>Nonetheless for the reasons set out in our response to Paragraph 6.55 we are not yet convinced that the case for the eastern relief road has been adequately demonstrated and so we do not believe that Option B is fundamentally flawed in not bringing this element of the plan forward. Moreover, whilst we acknowledge that a more dispersed development strategy does cause some infrastructure difficulties we believe that the advantages it has in terms of reducing the risk to biodiversity to the east of Kidderminster outweighs them at this time. We can find nothing in the evidence base to demonstrate otherwise.</p>
RSPB Midlands Regional Office	<a href="#">LPP01174</a>	Option B	Comment	<p>To summarise our position, on nature conservation grounds alone, the RSPB favours Option B.</p> <p>If Option A is chosen the impact on wildlife of local and County importance (specifically, the local corn bunting population) is likely to be greater, and would prompt the need seriously to examine the scope for large-scale habitat compensation in the form of species-rich grassland creation for corn buntings, as part of the development package.</p> <p>If Option A is selected, we recommend further consultation with WMBC to identify how and where best such compensation can be delivered. The RSPB would also be happy to advise further.</p>
	<a href="#">LPP01971</a>	Option B	Comment	My preferred option is Option B providing more housing with less loss of Green Belt.