

**Wyre Forest District Local Plan
2016 - 2036**

**Statement of Publication Consultation
(Regulation 22 (c) (v) Statement)**

Pre Submission Publication

Consultation Period November / December 2018



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1) Statement of Publication Consultation (November/December 2018)

Purpose of this Report

This document has been prepared to meet the requirements of Regulation 22(c) (v) of The Town and Country Planning (Local Planning) (England) Regulations 2012. The document will be submitted alongside Wyre Forest District Local Plan 2016-2036. It sets out details of the number of representations made in response to the publication period (November / December 2018) and a summary of the main issues raised by those representations.

Regulation 22 (c) also requires a statement detailing representations made at Regulation 18 stage. This requirement was fulfilled by the publication of the following documents alongside the Pre-Submission Publication Document:

- [Summary of Consultation Responses, Local Plan Preferred Options Consultation June 2017](#), approved by Cabinet on 30 October 2018 and
- [Local Plan Review Issues and Options Paper Consultation Responses \(September 2015\)](#), approved by Cabinet on 22 December 2015

These documents can be found on the Council's website at www.wyreforestdc.gov.uk/localplanreview

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 Pre-Submission Publication consultation held during November/December 2018.

Background

As part of the Local Plan Review, the Council produced a 'Pre-Submission Publication' document for consultation which took into account the Issues and Options consultation carried out in late 2015, the Preferred Options consultation carried out in summer 2017, along with the body of evidence that the District has now developed. The Pre-Submission document identifies the Council's development strategy for how the district intends to meet its development requirements in the period up to 2036 along with proposed strategic, development management and allocations policies.

Pre-Submission Publication Consultation (2018)

The Local Plan Review Pre-Submission Consultation took place between 1 November to 17 December 2018. This was the third stage of the Local Plan Review. All representations received during this publication stage will be submitted with the Local Plan to the Secretary of State for examination in public.

During the consultation period the Council sought views on the Pre-Submission document. The Pre-Submission consultation is the main consultation opportunity for the community and other stakeholders to comment on the 'soundness' of the Local Plan, as set out in NPPF paragraph 35. 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 1043 responses were received to this consultation.

Next Steps

The Council will be re-opening the Pre-Submission consultation for further comments to be made on the Local Plan in September/October 2019. This is following some updates to the evidence base documents which were found necessary as part of the statutory consultation responses received to the November/December 2018 consultation. Some amendments to the Local Plan will also be consulted on. Following this final stage of consultation, the Local Plan will be submitted to the Secretary of State who will then appoint a Planning Inspector to undertake the examination in public of the Local Plan. See the Local Development Scheme for details of the Local Plan project plan: <https://www.wyreforestdc.gov.uk/planning-and-buildings/planning-policy/project-plan.aspx>

2) Publicity for the Local Plan Pre-Submission Publication Consultation

Consultation Plan October 2018

A Consultation Plan for the Pre-Submission Publication consultation in November/December 2018 was prepared by Officers and approved by Overview and Scrutiny on 25th October 2018. The Consultation Plan can be found at Appendix 1.

Letter, Emails and Publicity

Over 2250 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 Pre-Submission consultation, detailed where to get further information (including dates of consultation drop-in sessions) and explained how to respond. A copy of the letters sent can be found at Appendix 1 of this document.

A publicity leaflet was delivered to households and businesses within the District by a mailing distribution company. The leaflet gave notification of the Local Plan Review Pre-Submission 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. The publicity leaflet can be found at Appendix 1 of this document.

People were given the option of responding to the consultation through an online consultation response portal, electronically by email or post. Responses needed to be submitted using the consultation response form and no late responses were accepted (i.e. responses received after 5pm on 17 December 2018 were not accepted). Guidance notes were also provided to help people complete the consultation response form. The response form and guidance notes can be found at Appendix 1.

The Pre-Submission document and Sustainability Appraisal were available for public viewing at Main Reception at Wyre Forest House, the Customer Service Centre, and local libraries within the District.

The Pre-Submission 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 eight 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

KIDDERMINSTER
Kidderminster Library
Kidderminster Town Council
Wyre Forest Town Hall
Wyre Forest Leisure Centre
Tesco Superstores
Morrisons
Asda
Iceland
Hodge Hill Garden Nurseries
Barnetts Hill Garden Centre
Offmore Church
Heronwood Primary School
St Oswalds Church Centre, Broadwaters
Church Street Surgery
Northumberland House
Aylmer Lodge Cookley Partnership
Kidderminster Health Centre
Stanmore House Surgery
Cafe Nero (2 posters)
Starbucks
Coffee #1
STOURPORT
Stourport Library
Stourport on Severn Town Council
Stourport Civic Hall
Areley Kings Village Hall
Tesco
Lidl
Cooks Garden Centre
Stourport Medical Centre
Mercian House Dental Practice
York Street GP Surgery
Denture Centre
Gingers Cafe
Clean Call (display boards High Street, Stourport)
BEWDLEY
Bewdley Library
Bewdley Town Council
St Georges Hall, Bewdley
Bewdley Museum

Bewdley Leisure Centre
Co-op
Tesco
Courtyard Cafe, Hopleys
Kimmy Loves Cake Cafe
Courtyard Cafe, The Shambles Museum, Bewdley
Clementine Cafe
Dentists
GP Surgery
RURAL AREAS
Wyre Forest Discovery Centre
Cookley – Tesco
Cookley – Post Office
Blakedown Post Office
Chaddesley Corbett Post Office
Fairfield Shop
Upper Arley Post Office
Rowberry Farm Shop, Chaddesley Corbett
Far Forest Post Office/stores
Colliers Farm Shop, Clows Top
Colliers Cafe, Clows Top
Clows Top Post Office
Cookley Village/Sports Hall
Cookley GP Surgery
Wolverley GP Surgery
The Farmers Den Cafe, Cookley
Chaddesley Corbett GP Surgery

All Town and Parish Councils were sent a consultation poster and asked to display it on their notice boards for public viewing. The poster can be found at Appendix 1 of this document.

Web-based Communication and Social Media

An interactive version of the Pre-Submission Document was made available to enable electronic representations to be made. The consultation response form could also be downloaded and printed or filled in and submitted online. Completed consultation response forms were also accepted by email or post. A copy of the consultation response form can be found at Appendix 1 of this document. The consultation response form followed the same structure as the standard response form issued by the Planning Inspectorate.

A link to the Local Plan Review Pre-Submission consultation was made available on the homepage of the Council's website. There was also a promotional banner on front page of website throughout the duration of the consultation period.

The Local Plan Review Pre-Submission document, Sustainability Appraisal and all the evidence base studies were available for viewing on the Council's Planning Policy web pages (<http://www.wyreforestdc.gov.uk/localplanreview>). 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 Pre-Submission consultation was promoted through the Council's Facebook and Twitter accounts. Promotional cover photograph images were added to Facebook and Twitter for the duration of the consultation period. Facebook events were created for each of the drop-in sessions. Regular social media posts, promoting the consultation and drop-in sessions, including during the networking hours.

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

- 1 November – changed cover photo – 565 people reached
- 13 November – promoted the drop-in sessions - 1,196 people reached, 10 shares
- 16 November – promoted Cookley's drop-in session - 314 people reached, 1 share
- 17 November – promoted Kidderminster's drop in-session - 295 people reached
- 22 November – promoted Areley Kings drop-in session – 328 people reached, 1 share
- 23 November - promoted Stourport's drop-in session – 216 people reached
- 26 November – promoted Bewdley's drop-in session – 616 people reached, 3 shares
- 29 November – promoted Kidderminster Town Hall's drop-in session – 443 people reached
- 10 December – generic post – 2,335 people reached, 1 share
- 12 December – generic post – 276 people reached
- 13 December – generic post – 611 people reached, 2 shares
- 14 December – generic post – 634 people reached
- 15 December – generic post – 579 people reached
- 16 December – one day left! – 764 people reached
- 17 December – last chance to comment – 559 people reached, 1 share

Twitter:

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

Wyredin, a bi-monthly email news letter for residents

Consultation on the Pre-Submission document featured in the following 2018 editions of Wyredin:-

[August](#) 2018

[October](#) 2018

[December](#) 2018

There are approximately 1,700 subscribers to the newsletter.

GovDelivery

The GovDelivery new email marketing system, introduced in December 2018 was used. A Planning newsletter was issued on 10/12/2018 highlighting consultation coming to an end.

Press Coverage

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

- 18th October 2018 – 'Council unveils revised Local Plan including proposals for new village at Lea Castle'

- 1st November 2018 – ‘Have your say on Local Plan’
- 12th December 2018 – ‘Local Plan 2016-2036 - consultation closes 17 December’

The Press releases from the Council can be viewed here:

- [Council unveils revised Local Plan including proposals for new village at Lea Castle](#)
- [Have your say on Local Plan](#)
- [Local Plan 2016-2036 - consultation closes 17 December](#)

The Kidderminster Shuttle and the Express & Star newspapers published news articles about the Local Plan Pre-Submission document during the course of the consultation period.

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

The Planning Magazine also published an article on 1st November 2018 about the Wyre Forest District Local Plan Review Pre-Submission consultation, as shown below:

The screenshot shows the Planning Resource website interface. At the top, it says 'From the publishers of Planning > DCP > COMPASS >' and includes links for 'Post a job', 'Subscribe', 'My Bulletins', 'My Account', and 'Sign out'. The main header features the 'PLANNINGRESOURCE' logo with the tagline 'Independent intelligence for planning professionals' and a search bar. A navigation menu includes 'Home', 'News', 'Decisions', 'Policy', 'Dev. Plans', 'Knowledge', 'Events', and 'Jobs'. Below the menu, there are sub-sections for 'Local Plans' and 'Neighbourhood Planning'. The main content area displays the article title 'Wyre Forest Local Plan - Strategy published' dated '1 November 2018'. The article text states: 'Wyre Forest District Council published its Local Plan on 1 November 2018' and 'Wyre Forest District Council has published a draft version of its Local Plan that is available for consultation between 1 November 2018 and 17 December 2018.' Below the text is an 'ATTACHMENTS' section with a link for 'Wyre Forest - Local Plan - Publication Draft'. On the right side, there is a 'Follow Us:' section with social media icons and a 'PLANNINGJOBS' section listing various roles such as 'Principal Planning Consultant (Policy)', 'Planning Officer', 'Principal Major Developments Officer', and 'Senior Planning Enforcement Officer'.

Engagement with Residents and Stakeholders

During the public consultation on the Pre-Submission 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 Pre-Submission 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
Friday 16 November 2018	3pm – 7pm	Cookley Village Hall
Saturday 17 November 2018	10am – 2pm	Offmore Evangelical Church Hall, Kidderminster
Tuesday 20 November 2018	5:30pm – 8pm	Heronwood Primary School, Spennells, Kidderminster
Friday 23 November 2018	3pm – 7pm	Areley Kings Village Hall
Saturday 24 November 2018	10am – 2pm	Stourport Civic Hall
Tuesday 27 November 2018	3pm – 7pm	St Georges Hall, Bewdley
Thursday 29 November 2018	3pm – 7pm	Kidderminster Town Hall
Friday 30 November 2018	3pm – 7pm	St Oswalds Church Centre, Broadwaters Drive, Kidderminster

The drop-in sessions were attended by over 740 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 were notified of the consultation and how to respond. This demonstrates that the Duty has been fully considered and complied with at this stage of the Local Plan Review. Where cross-boundary issues were identified, Officers 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 statement of publication consultation and includes 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 525 respondents to the consultation. These respondents have raised 1043 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 2 petitions (with signatures) and 2 responses from resident groups in relation to the plan from the following groups:

- Friends of Patricks Field (Petition)
- Low Habberley (Petition)

- Bewdley Say No to Gladman (Resident Group)
- Burlish Concerned Residents Group (Resident Group)

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 and Residents Groups

4a) Statutory Consultees – Key Issues

The following gives a summary of the key issues raised by the Statutory Consultees. A list of the statutory and specific consultees consulted can be found at Appendix 2 of this document:

Worcestershire County Council

Infrastructure Delivery Plan (IDP) – WCC is one of the main infrastructure providers for the county, in its role as a Local Highway Authority, transport authority and education authority. WCC and WFDC have worked jointly on the development of the IDP which sets out the infrastructure required to support the development aspirations of the plan. Unfortunately, the site list used for the IDP was not the same list as was included in the Pre-Submission Plan itself. WCC will, therefore, need to undertake the detailed transport modelling and assessment again, with further considerations of the required transport mitigation. WCC propose to undertake this detailed work with WFDC during quarter 1 and 2 of 2019. WCC will also remodel the education requirements of the plan to inform a revised version of the IDP. The outcome of this work will be required to support the Duty to Co-operate agreement between WCC and WFDC and form part of the Statement of Common Ground.

Viability – The viability assessment, where based on specific sites, appears to be at odds with the site numbers and allocations in the Pre-Submission Plan itself. This may or may not have a material impact, but for the avoidance of any confusion and doubt, the site data should be consistent. Further work is required to address this issue.

Minerals and Waste – suggested tweaks and changes to Minerals and Waste policy wording.

Site Allocations – WCC submitted a list of site allocations which need to take account of safeguarding issues. The following sites have been included in the list:

- BHS/16 – Timber Yard, Park Lane
- BHS/38 – Kidderminster Fire Station
- BW/4 – Stourbridge Road ADR
- FPH/5 – Ambulance Station

- FPH/10 – Silverwoods Phase 2 (Housing)
- FPH/23 – Silverwoods Phase 1 (Housing)
- OC/11 – Stourminster School Site
- WFR/WC/18 – Sion Hill School Site
- WA/KF/3 – Land at Low Habberley
- LI/10 – Land r/o Zortech Avenue
- BHS/11 – Green Street Depot
- BHS/17 – Rock Works, Park Lane
- FPH/8 – SDF and adjacent land
- FPH/10 – Silverwoods Phase 2 (Employment)
- FPH/23 – Silverwoods Phase 1 (Employment)
- FPH/24 - Romwire
- FPH/27 – Adj. Easter Park, Worcester Road
- FPH/28 – Land at Hoobrook
- LI/12 – Former Burlish Golf Course Clubhouse
- MI/26 – Ratio Park, Finepoint
- BW/4 (Green Gap) – Stourbridge Road ADR
- WFR/WC/32 – Lea Castle East
- WFR/WC/33 – Lea Castle West
- WFR/WC/34 – Lea Castle North
- OC/5 – Land at Husum Way
- OC/6 – Land east of Offmore
- OC/12 – Comberton Lodge Nursery
- OC/13N – Stone Hill North
- AKR/14 – Pearl Lane, Areley Kings
- AKR/18 – Yew Tree Walk
- LI/11 – Land west of former school site Coniston Crescent
- MI/10 – Four Acres Caravan Park
- MI/24 – Adj. Rock Tavern Wilden Lane
- MI/38 – School site Coniston Crescent
- MI/36 – Firs Yard Wilden Lane
- MI/18 – Land north of Wilden Industrial Estate
- WA/BE/1 – Stourport Road Triangle
- WA/BE/3 – Catchem’s End
- WA/BE/5 – Land south of Habberley Road
- WFR/WC/36 – Rock Tavern Car Park Caunsall
- WFR/WC/37 – Land at Caunsall Road, Caunsall

Sustainable Transport – WCC is content with the transport policies in the plan, which prioritise sustainable transport and include some critical schemes for the district. However, WCC have raised concerns as the sustainable approach to rail is undermined by failure to allocate land for the further phase 2 expansion of Blakedown station and associated car parking provision. WCC point out that although this may appear to be a minor matter, the consequences of this is to undermine the

sustainable transport strategy which WCC have sought to achieve through the Local Transport Plan 4 and the Rail Investment Strategy, and its impact may be wider than WFDC itself.

Wolverhampton City Council – on behalf of the Association of Black Country Authorities (ABCA), composed of Dudley MBC, Sandwell MBC, Walsall MBC and the City of Wolverhampton Council

The Black Country authorities (BCA) wish to submit a formal holding objection to the Plan until issues relating to the Duty to Cooperate are resolved. In particular, BCA claim that the Plan makes no commitment to contribute towards meeting the evidenced unmet housing and employment needs of neighbouring authorities, including the Black Country authorities. The BCA request that the Plan makes provision to help meet unmet housing and employment needs of the Black Country, either in the form of the identification of additional sites or through a firm commitment to an early review of the Plan. The BCA do not consider that the Plan adequately addressed the Duty to Cooperate and the tests of soundness set out in the NPPF.

South Staffordshire Council

South Staffordshire Council does not consider the plan as proposed to be 'unsound'. The inclusion of Policy 6A(B) is welcomed in particular the recognition that Wyre Forest District could make a contribution towards meeting the identified housing supply shortfall in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA). However, South Staffs request that Wyre Forest reconsider the present approach of restricting such considerations to a non-specified future review. The potential scale of the housing supply requirements and shortfall within the GBBCHMA has been evidenced through the adoption of the Birmingham Development Plan 2031 and the subsequent GBBCHMA Growth Study (2018). It is the view of South Staffordshire Council that it would be consistent with the Duty to Co-operate requirements for Wyre Forest to more actively consider a contribution towards meeting the GBBCHMA shortfall as part of the current local plan review process.

South Worcestershire Councils

The South Worcestershire Councils feel that WFDC has fulfilled the Duty to Cooperate with the South Worcestershire Councils, engaging with them at every stage of the Plan's preparation. However, they note that WFDC intend to submit the plan for examination in July 2019 and therefore, in accordance with the requirements of NPPF 2018, a Statement of Common Ground should have been prepared and signed by relevant Duty to Cooperate partners. The South Worcestershire Councils have not been asked to sign such a statement and there is no evidence that one has been prepared and made available alongside the Publication document. They have suggested that WFDC should prepare a Statement of Common Ground, agree it with relevant Duty to Cooperate partners and publish it.

Paragraph 6.5 of the draft Local Plan refers to the housing number being based on 2016 household projections. The most recent Government advice is to ignore those projections and use the 2014 based household projections instead and therefore, the basis of the housing number should be reconsidered.

Bromsgrove District Council

It is the view of Bromsgrove District Council (BDC) that the Wyre Forest Local Plan is unsound. BDC do not consider that the plan is justified, effective or consistent with national policy. The objection focuses on Policy 12: Strategic Infrastructure and Policy 13: Transport and Accessibility in Wyre Forest and the evidence base which purports to support them, most notably the Infrastructure Delivery Plan (IDP) and the Transport Modelling (TMR).

BDC consider Policy 12 to be a generic policy for the requirement of infrastructure to support the plan, and Policy 13 begins to provide more detail on what infrastructure is required. It is the view of BDC that policies 12 and 13 fail to satisfy Paragraph 16 (a) and (b) of the NPPF. BDC fail to see how the infrastructure requirements are deliverable. BDC also fails to see how the policy is clear and unambiguous on what infrastructure is required, and when and how it is to be delivered. Of particular concern in relation to the clarity of the policy are the inconsistencies between the IDP requirements and the requirements in the policy.

BDC responded to the preferred option plan, expressing concern about the possible implications of development to the eastern and north eastern side of Kidderminster on transport infrastructure in Bromsgrove. At the time BDCs concern was the lack of evidence to allow BDC to make an informed decision on the implications for the district. Unfortunately, BDC feel that little work has been done to strengthen the evidence base and therefore BDCs concerns remain.

BDC has the following concerns with the Transport Modelling Report (TMR):

- The Wyre Forest Transport model is a multi-modal model but only the highway assignment model has been used.
- There is a mis-match between the development assumptions in the Wyre Forest Local Plan Review (2016-2036) – Transport Modelling Report and the Wyre Forest District Council IDP.
- A simplistic approach to trip generation has been adopted. A single rate assumed for all residential development and a single rate assumed for all job / employment types.
- It is not clear whether there has been any optimisation of the highway network in the future year network.
- There is no definition provided of “capacity” or “congestion”.
- In the Appendix, information on housing is not provided for mixed use development. Housing capacity is provided for residential areas, but the number of jobs assumed for employment is not provided.

BDC has the following concerns with the WFDC Infrastructure Delivery Plan (IDP):

- There is a mis-match between the development assumptions in the Wyre Forest Local Plan Review (2016-2036) – Transport Modelling Report and the Wyre Forest District Council IDP.
- No reference to modelling 5 years ahead, albeit the IDP refers to national guidance that states that the IDP should be clear for at least 5 years ahead.
- There is reference to options consultation but no reference to modelling of options.
- The document states that where the deliverability of critical infrastructure is uncertain alternative strategies should be assessed. It is not clear if the testing of alternative strategies has been undertaken in the (highway) modelling.

- There is no definition provided of “capacity” or “congestion”, so it is not clear how infrastructure needs have been identified.
- Not clear how network capacity has been maximised albeit the document states that there is a need to demonstrate that capacity has been maximised.
- Not clear on how infrastructure needs have been identified as there is no reference provided to an appraisal or sifting process of definition of need.

The reason why these elements are a concern to BDC and lead them to a conclusion of unsoundness relates to the identification of additional congestion on the A456 through Hagley in Bromsgrove District. Also the identification of additional congestion on the A448 at Mustow Green which is the main route between Bromsgrove and Kidderminster is a similar concern. Both these locations have now been identified as requiring bypasses. In principle, BDC does not necessarily object to these bypass proposals, providing they are underpinned by robust evidence of need, and more importantly delivery. However, BDC feel that for them to be able to get to this position they need to see clearly that these proposals are the correct form of mitigation when considered against other options in these locations, and it needs to be clear what the wider cumulative impacts of these proposals are on transport infrastructure. BDC consider this to be important because once the need for them is robustly established it will need to be clear how these and other proposals will be funded and delivered in a coordinated way.

BDC consider that the wording of policies 12 and 13 could be amended to strengthen them and provide more clarity in relation to the mitigation required. However, as there fundamental issue is with the evidence which underpins these policies, without a more robust evidence base BDC do not consider the WFDC Local Plan can be made sound with simple policy wording changes.

Natural England

WFR/WC/15 Lea Castle Hospital – Natural England have commented that the site appraisal for WFR/WC/15 does not acknowledge that there is a direct hydrological link to Hurcott and Podmore Pools SSSI, which could impact the SSSI. This potential impact should be addressed through mitigation. Natural England would welcome it if the SA was amended to better steer the policy towards this outcome. Although at this late stage in plan making, NE would be satisfied to see the policy amended accordingly.

OC/13 Land at Stone Hill – Natural England have commented that the site appraisal for OC/13 does not acknowledge that the water courses on site connects to Wilden Marsh and Meadows SSSI. This potential impact should be addressed through mitigation. Natural England would welcome it if the SA was amended to better steer the policy towards this outcome. Although at this late stage in plan making, NE would be satisfied to see the policy amended accordingly.

BR/BE/6 Land off Highclere – Natural England recommends that Appendix B Site Appraisal should include priority habitats to be considered.

Policy 11D – Natural England have commented that some of the information in Table 1 of Policy 11D is incorrect or missing. The missing information which should be added is as follows:

- Hurcott Pasture SSSI – a good example of species-rich, lowland, acidic grassland pasture

Natural England has identified the following as incorrectly named as SSSI's, which should be changed:-

- Hartlebury Common and Hillditch Coppice SSSI
- Showground Meadow, Callow Hill SSSI

SSSI which would benefit from further information:-

- Kinver Edge SSSI is also notified for geology.

Natural England request that the LPA makes the corrections listed above and confirms that this has been done via email in advance of the Examination.

Policy 14, b(iii) – Natural England have commented that if there is scope to make a minor amendment to the plan, then they consider that the following change would improve policy 14:

Natural England note that Policy 14 does not give a specific figure for the provision of green infrastructure (GI) on brownfield land. Natural England suggest that a proviso is added for circumstances where the LA may need to require a certain amount of GI for a proposal. For example, for onsite mitigation for impacts on a protected site or where brownfield sites have high environmental value.

Policy 30.21 Land at Low Habberley (WA/KF/3) – Natural England recommend that the allocation should set out how biodiversity and environmental net gain will be achieved, in line with the NPPF (paragraphs 118z, 170d, 174b) and delivering the aspirations of the Government's 25 year Environment Plan. Specifically, NE recommends that the policy requires planning proposals to specify how the existing and surrounding habitats (which includes Habberley Valley Local Wildlife Site/ Nature Reserve and Easthams Coppice) will be taken into consideration. Measures to protect and mitigate for bats and brown hare should also be considered.

Policy 31.2 Lea Castle Village – Natural England has advised that surface water drainage from the Lea Castle site discharges into Hurcott pool, part of the Hurcott and Podmore Pools SSSI. They therefore advise that development at the site could impact the SSSI through bad water quality and reduced water quantity. The SSSI has suffered in the past from poor water quality and reduced water levels which have led to a loss of aquatic plants in favour of algae and impacted on invertebrate species, both of which are important food sources for a range of wetland birds. Policy 31.2 therefore should reflect these issues and include a point to ensure that current levels of water quality and volume entering the SSSI from the proposal site are maintained and that improvements and net gains especially in terms of water quality are achieved as part of the development.

Historic England

Table 2.0.1 – The table continues to refer to 'historic' assets'. Historic England recommend revising 'historic assets' to read 'heritage assets' in line with NPPF terminology for the avoidance of doubt.

Table 3.0.2 – Table 3.0.2 now includes Objective 8 for the historic environment which is generally welcomed. However, the objective does not refer to enhancement or setting so does not address requirements of the NPPF which would be necessary in order to demonstrate a positive approach to

the historic environment. Historic England recommend revising the wording of Objective 8 as follows: “To promote the historic environment and conserve or enhance the significance of heritage assets and their setting 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.”

Paragraph 5.5c(vi) – Paragraph 5.5c(vi) does not refer to all heritage assets, e.g. Conservation Areas are not mentioned, or setting as part of the environmental role of the Plan. It is not clear why these are not included. Historic England recommend revising the wording of this point to ensure it addresses all heritage assets and their setting – *‘heritage assets and their setting’* could be used instead of setting out individual assets and would cover designated and non-designated heritage assets in line with NPPF requirements and terminology and for the avoidance of doubt to ensure the Plan sets out a positive approach to the historic environment.

Policy 6E – Policy 6E regarding market towns would be more effective and demonstrate a positive approach to the historic environment within the Plan if a reference to the local historic environment was included. Historic England suggest that paragraph 1 of Policy 6E is amended to read: “Within the District’s market towns of Stourport-on-Severn and Bewdley, both of which have Conservation Areas (& other heritage assets?) at their town centres, the following development proposals will be sought.” Add bullet point: “Development affecting any of the three conservation areas should conserve or enhance the character or appearance of those areas.”

Policy 26 – Historic England continue to object to the inclusion of a policy which indicates support for ‘enabling development’ in respect of the historic environment. A policy indicating support for heritage at risk, or the conservation or enhancement of heritage assets is a different matter but support for ‘enabling development’ could be misinterpreted.

Historic England recommends the wording related to ‘enabling development’ is removed from the Plan. Any such schemes could be dealt with sufficiently and appropriately under proposed historic environment policies and the proposed viability policies within the Plan.

Policy 31.2 – The Lea Castle Village principles for development do not refer to the potential archaeology or recording of above ground assets as set out in the LPA’s site allocation heritage assessment work. Historic England note that outline permission has been granted but this could expire and the requirements would not be clear since the policy makes no provision for the consideration of heritage assets but does for other matters.

It is recommended the principles for development (Policy 31.2) include a criteria relating to the historic environment requirements as set out in the LPA’s own site allocation heritage assessment information to demonstrate a positive approach to the historic environment and to ensure future developers are clear about the heritage requirements for the site.

Policy 36.4 – Typographical error – ‘Conservation instead of ‘Conservation Area’. Include ‘Area’ after ‘Conservation’ for completeness and clarity.

Environment Agency

The EA have suggested some additional comments/changes to the following policies in the draft Local Plan:-

Policy 12: Strategic Infrastructure – The Environment Agency support the integrated approach to strategic infrastructure. In particular, EA note the reference to the potential provision of a contribution towards infrastructure such as flood alleviation schemes (new or maintenance of existing), flood warning provision for example relevant to the EAs remit. The EA suggest that, for some site specific sites which may be reliant upon flood warning and/or contribute to flood defence infrastructure, the District Council includes some reference to such within the policy/reasoned justification.

Policy 14: Green Infrastructure (GI) – The EA supports the approach to incorporating, protection/enhancement of GI within the locality. The EA would encourage GI that would help to enhance and maintain habitat for those species protected under the Conservation of Habitats and Species Regulations 2010. Within Policy 14 the EA recommend the addition of the need to enhance blue infrastructure. The EA would seek appropriate blue infrastructure i.e. ‘blue’ landscape elements are linked to water such as pools, ponds and wetland systems, artificial basins or watercourses. Along with green infrastructure they help form an interconnected network of environmental enhancements within and across catchments. The EA would also welcome identification of opportunities for and measures to secure net gains for biodiversity, and other environmental improvements, in line with the NPPF.

Policy 15A: Water Conservation and Efficiency – The EA note the inclusion of Policy 15A to secure higher (more stringent) levels of water efficiency for residential development throughout the district. In line with the approach for justifying higher levels of water efficiency policies, the EA has recently produced mapping which show areas of water stress and/or catchments that are likely failing due to low flows. This is within appendix A of the Water Cycle Study evidence. It should be noted that whilst this does not cover the whole area, it covers most of Wyre Forest District (covering the east of the district). The EA suggest that the Council may want to secure higher water efficiency throughout the district as proposes in Policy 15A to help achieve this water resource reduction objective. Note – primary sources of evidence which might support higher water efficiency standards for new dwellings are detailed on appendix A.

Section 15.5 – The EA consider that the text provided in section 15.5 of the draft Local Plan is currently not entirely accurate. The EA suggest to remove this line and replace it with the following text: “The Wyre Forest area covers surface and groundwater bodies that are either at risk of or have been impacted by abstraction. In areas such as this the Environment Agency is working with abstractors including water companies to reduce the impact of abstraction on the environment and bring it to more sustainable levels.”

The EA also advise considering whether to include a water efficiency policy for non-residential development. For non-residential, the EA would recommend the inclusion of the following text: “Ensuring/supporting developments that follow the water conservation hierarchy. Where standards currently exist for a particular non-domestic building type in BREEAM, maximum points should be scored on water and a minimum of 25% water savings for any other development.”

BREEAM (BRE Environmental Assessment Method) is a widely used environmental assessment method for non-domestic buildings. It sets the standard for best practice in sustainable design and is used as a measure to describe a building's environmental performance (<http://www.breeam.com/index.jsp>).

Policy 15B: Sewage Systems and Water Quality – The policy currently states “Strategies to help mitigate the impact of development on water quality will be required at planning application stage.” The EA ask for reference to the inclusion of Water Framework Directive (WFD) objectives. The EA seek measures to improve water quality and water body status to help achieve good ecological status. The EA suggest the policy be amended to include – “Proposals should seek opportunities to improve water quality and help achieve good ecological WFD status.” The Reasoned Justification text (15.12) could include – “WFD data is available from the Environment Agency’s Catchment Data Explorer tool at: <http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/9>”

The EA are satisfied with the evidence provided in the Water Cycle Study.

Policy 15C: Flood Risk Management – The EA would support Policy 15C subject to the following amendments:

- Part ii – bullet point add – confirms “any opportunities for wider flood risk benefits” “Flood management and flood warning plan requirements”.
- Bullet Point 5 of Policy 15cii) after ‘flood storage will be maintained’ could say “improved” (where possible).
- Additional point within 15cii: Bullet point 3 could also include “Where necessary any flood proofing/resistance measures are incorporated into the design”.
- 15Cii) Where appropriate, the FRA could recommend contributions towards new or existing flood defence infrastructure maintenance and/or improvement where necessary and flood warning contributions where development is reliant upon that service, in accordance with the NPPG tests for such obligations.
- Part iii appears to duplicate some texts from within the NPPG (flood risk). The EA suggest making it more locally specific by amending it/adding the following: “iii) Consideration of wider benefits and opportunities, including from cumulative impact assessment, to help ensure development will be safe, and reduce flood risk in the catchment where possible.”
- Amend Part v) so it reads: “A minimum 8m access strip is provided adjacent to watercourses for maintenance purposes. It should be appropriately landscaped for biodiversity benefits. The width of the strip may be reduced for smaller ‘Ordinary’ watercourses, i.e. to separate out from those EA Main River ones.”

Policy 16B: Pollution and Land Instability – Where developments are subject to an Environmental Permit from the EA, the EA would encourage pre-application discussions. The EA suggest the inclusion of the following text in Policy 16B: “We would encourage the parallel (twin) tracking of an Environmental Permit application with the planning application to provide reasonable degree of certainty on the land use planning impacts and pollution control measures.” “These applications should provide an appropriate level of detail to inform a reasonable degree of certainty on the planning application and to ensure the principle of the development and use of the land is acceptable with cross reference to permitting constraints.” The EA would support the inclusion of

the need for developers to consider the EA's Groundwater Protection position statements in relation to protection of groundwater (EA recommends putting a link to it in the reasoned justification para 16.6).

Policy 28B: Chalets, Caravans, Mobile Homes – The EA supports the policies set out for Chalets, Caravans, Mobile Homes, as well as conforming to flood risk management policies set out in the draft Local Plan and NPPF.

Proposed Allocations – The EA notes that allocations have been assessed against relevant technical evidence, including the Water Cycle Study and level 1 and 2 SFRA.

Severn Trent

Severn Trent finds the Wyre Forest draft Local Plan to be 'sound' and legally compliant. They also consider the Local Plan to comply with the Duty to Cooperate. In addition, Severn Trent is supportive of the following policies:

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

As part of their response Severn Trent has submitted the results of their high level sewage capacity assessment for the housing sites listed in the Pre-Submission Consultation. Severn Trent would like to draw the Council's attention to the following sites that have been classed as either high or medium risk:

Policy 30:-

- BW/4 - Stourbridge Road ADR – Medium risk
- WA/KF/3 - Land at Low Habberley Phase 1 – Medium risk

Policy 31:-

- WFR/WC/15 - Lea Castle – Medium risk
- WFR/WC/32 - Lea Castle – Medium risk
- WFR/WC/33 - Lea Castle – Medium risk
- WFR/WC/34 - Lea Castle – Medium risk

Policy 32:-

- OC/5 - Husum Way – Medium risk
- OC/6 - R/O Offmore – Medium risk
- OC/12 - Comberton Lodge – Medium risk
- OC/13N - Land at Stone Hill North – Medium risk

Policy 33:-

- AKR/10 – Queens Road Shops – Medium risk

- AKR/14 – Pearl Lane – High risk
- M/6 – Steatite Way – Medium risk
- MI/38 – School Site Coniston Crescent – Medium risk
- LI/11 – Land west of former school site – Medium risk

Policy 34:-

- BR/BE/1 – Bewdley Fire Station – Medium risk
- WA/BE/3 – Catchems End – Medium risk
- WA/BE/5 – Land south of Habberley Road – Medium risk

Highways England

Highways England is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England. The network includes all major motorways and trunk roads, and in the vicinity of Wyre Forest comprises the M5 motorway.

Highways England has outlined the potential implications of development traffic on the SRN; specifically at M5 Junction 4. Although this part of the SRN lies within the adjacent Worcestershire district of Bromsgrove the traffic implications of development can inherently be cross boundary in nature depending on the origin and destination of journeys. In this regard M5 Junction 4 is one of two principal accesses to the SRN, along with M5 Junction 3, for longer distance and regular commuting journeys that either begin or end within Wyre Forest District.

Technical work carried out for Highways England, including traffic modelling, has demonstrated that the effects of Local Plan growth in Wyre Forest will be expected to exacerbate existing traffic congestion issues on the A491 Sandy Lane arm of M5 Junction 4 with wider consequences for the operation of the junction. This arm has a direct relationship with traffic accessing Wyre Forest and consequences include the blocking of traffic seeking to exit the M5 northbound off-slip resulting in queuing on the slip road.

An update to Wyre Forest’s Infrastructure Delivery Plan (IDP) will be necessary to ensure the transport implications of the plan for the SRN are mitigated and for the plan to be sound in the view of Highways England. This is likely to require policy support through the wording contained within the main Pre-Submission Plan document.

Sport England

Policy 6B: Locating New Development – Sport England finds this policy to be unsound because the table does not include sports and recreation uses as suitable development within Stourport-on-Severn, notwithstanding that the settlement including a significant sports hub to the south. This is inconsistent with the rest of the Plan, and in particular the final bullet of Policy 6E which appropriately includes sufficient protection/provision of outdoor sports facilities. This is important to ensure consistency in the Plan and to ensure that the existing sports facilities in Stourport are suitably protected/enhanced in accordance with paragraph 97 of the NPPF and the evidence in the Council’s Playing Pitch Strategy and Built Sports Facilities Strategy which were adopted in 2017.

Sport England recommend adding sport and recreation uses to Table 6.0.3 for Stourport-on-Severn.

Policy 6E: Role of Stourport-on-Severn and Bewdley as Market Towns, Paragraph 6.36 – Sport England supports the final bullet in Policy 6E that provides protection/provision of outdoor sports facilities as this is consistent with paragraph 97 of the NPPF and the evidence in the Council’s Playing Pitch Strategy adopted in 2017. The reference to the playing pitch strategy in paragraph 6.36 is also supported as this is the appropriate evidence base for development affecting outdoor sports facilities in accordance with paragraph 96 of the NPPF.

Policy 9: Health and Wellbeing – Sport England generally supports this policy, and in particular the references in part 2 to active travel, in part 3 to Sport England’s Active Design guidance in respect of encouraging sport and physical activity through good design, and part 4 regarding providing opportunities for formal and informal physical activity. This is consistent with the guidance in the NPPF, particularly paragraphs 91 and 92 relating to promoting healthy and safe communities. However, the policy fails to cross-refer to other policies in the Plan that inter-relate to health and well-being namely Policy 20A-C. Linking the policy that promotes health and well-being with the policies for community facilities, open space, sport and recreation policies would be consistent with paragraph 96 of the NPPF, which recognises that having access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.

Sport England recommends amending the wording of Policy 9 by adding cross reference to Policies 20A-C.

Policy 10A: A diverse Local Economy – Sport England objects to the allocation LI/12 Former Clubhouse at Golf course for proposed employment development as this would result in the loss of an existing sports facility.

Sport England recommends amending Table 10.0.1 (Policy 10A) to remove allocation LI/12, or to include provision within the plan for appropriate investment in an equivalent or better provision of sports facilities in a suitable location to accord with paragraph 97 of the NPPF, and in accordance with the evidence in the Council’s Playing Pitch Strategy and Built Sports Facilities Strategy.

Policy 12: Strategic Infrastructure – Sport England supports Policy 12 which requires developments to provide or contribute towards infrastructure needed to support it, and that such infrastructure should be in place when it is needed. The reasoned justification includes reference to social infrastructure and green infrastructure which Sport England takes to include sport and recreation facilities including playing fields, but this is not explicitly stated referring to the Infrastructure Delivery Plan in paragraph 12.8, and so this should be made clear for the avoidance of any doubt.

Sport England recommends adding sport and recreation facilities to the types of infrastructure referenced in paragraph 12.8.

Policy 14: Strategic Green Infrastructure – Sport England generally supports this policy. However, in part B the wording of the policy only makes provision to retain, protect and enhance Green Infrastructure. It fails to reference providing new green infrastructure which is required to be consistent with other policies in the Plan, particularly those relating to Strategic Infrastructure (Policy 12) and Open Space (Policy 20B-C), the Lea Castle allocation which makes provision for new playing field, and to be consistent with the guidance in paragraph 96 relating to the new provision of

open space, sport and recreation facilities based on robust and up-to-date assessments of need, in this case the adopted Playing Pitch Strategy.

Sport England supports part 4 of the policy which requires masterplanning for all major developments to be informed by Green Infrastructure concept plans, and the reference in part 5 to undertaking early engagement to agree such infrastructure priorities.

In respect of part 6 of the policy, Sport England objects to the exclusion of site allocations from the requirement of this part of the policy to appropriately address the loss of Green Infrastructure as this is not consistent with paragraph 7 of the NPPF.

In respect to the application of part 6 of the policy to all development sites that would have a detrimental impact on GI (whether they are allocated sites or not), and in so far as this relates to sport and recreation facilities including playing fields, the wording of *part ii) of at least equal community... benefit is secured for the locality or wider area* is not consistent with paragraph 97(b) of the NPPF where the relevant test is for equivalent or better quantity and quality in a suitable location. Sport England is concerned that the interpretation of what is equal benefit might not necessarily provide *equivalent or better quantity and quality* and the wording *suitable location* is also more appropriate than *locality or wider area* (to address circumstances where replacement GI is proposed in an unsuitable location).

Sport England recommend amending the wording of part B to read “New development will be expected to retain, protect, enhance and provide Green Infrastructure...”.

Sport England recommend deleting the words “*Other than specific site allocations in the development plan from part 6 of the policy*” to accord with paragraph 97 of the NPPF.

Policy 20A: Community Facilities, Paragraph 20.2, 20.3, and 20.6 – Sport England supports policy 20A and the associated justification in paragraph 20.6 which accords with paragraph 97 of the NPPF and Sport England’s policy guidance regarding development affecting existing sport and recreation facilities including playing fields. Sport England supports the exclusion of sport and recreation facilities from the viability test in part iv) of the policy since viability is not part of the test to be applied from paragraph 97 of the NPPF.

Sport England supports the first bullet point which provides support for new community facilities to meet identified local needs (and the associated reference to paragraph 20.3 to the Playing Pitch Strategy and Built Sports Facilities Strategy), as this will accord with paragraph 96 of the NPPF to plan positively for sport and recreation based upon robust up to date evidence base.

The inclusion of Built sports facilities and formal sports pitches and courts is also supported in paragraph 20.2.

Policy 20B: Open Space, Paragraph 20.12 – Sport England supports Policy 20B and the associated justification in paragraph 20.12 which accords with paragraph 97 of the NPPF and Sport England’s policy guidance regarding development affecting existing sport and recreation facilities including playing fields.

Policy 20C: Provision for Open Space, Sports Pitches and Outdoor Community uses in Housing Development – Sport England supports Policy 20C and the associated justification in paragraph 20.14 – 20.19 which accords with paragraph 96 of the NPPF regarding the need to plan positively for meeting the needs for open space, sport and recreation facilities.

Sport England considers the Council to have prepared up to date evidence in accordance with paragraph 96 of the NPPF in the form of the Playing Pitch Strategy (PPS) and Built Sports Facilities Strategy (BFS).

Sport England supports paragraph 20.18 which identifies that to ensure that the evidence base remains up to date; the Playing Pitch Strategy will be reviewed during the plan period as this accords with Sport England’s advice for assessing the needs for playing pitches to take into account any changes that may affect the supply and demand over time.

Policy 25: Safeguarding the Green Belt – Sport England generally supports Policy 25 which recognises that outdoor sport and recreation are recognised as not being inappropriate development in the Green Belt in accordance with paragraph 145 of the NPPF. However, the wording of the policy is not consistent with the recent amendment to the NPPF paragraph 145(b) which has clarified that this includes being in connection with the existing use of land or a change of use.

Sport England recommends amending the wording of Policy 25 part ii) to read: *“Provision of appropriate facilities (both for existing use of land or a change of use) for outdoor recreation...”* to ensure that the wording of the policy is consistent with paragraph 145(b) of the NPPF.

Policy 30: Kidderminster Town, and Policy 30.9: Former Burlish Golf Course Clubhouse (LI/12) - Sport England objects to the allocation of site LI/12 Former Burlish Golf Course Clubhouse. Sport England object as this allocation would result in the loss of an existing sports facility. Neither the Council’s playing pitch strategy or built sports facilities strategy assesses the need for gold courses. No evidence has been prepared to demonstrate that the golf course is surplus to requirements to address NPPF paragraph 97(a).

The Council’s Playing Pitch Strategy identifies that there are shortfalls of provision to meet quantitative needs for football (including the need for additional match sessions on grass pitches and additional 3G artificial grass pitches), and rugby union, with provision for cricket and hockey currently being met. Future demand at the end of the proposed plan period (2033) to take into account population growth is also assessed where existing shortfalls of provision are maintained or exacerbated.

The site adjoins existing playing fields. Sport England advises that additional playing field provision in this location could therefore make a positive contribution to addressing identified needs set out in the Playing Pitch Strategy (in the event that the golf course was demonstrated to be surplus to requirements).

The Council’s Built Sports Facilities Strategy identifies the need to make qualitative improvements to existing sports halls and swimming pools at existing school sites and to provide new/improved facilities including potential replacement of the athletics track at Stourport Sports Club close to the

golf course site. Sport England therefore considers that there is the potential to invest in alternative sports provision close by that would align with this evidence base.

Sport England conclude that there is no provision within the policy allocation for securing equivalent or better re-provision elsewhere to address NPPF paragraph 97(b) in accordance with the evidence in the Playing Pitch Strategy. Therefore, the allocation of site LI/12 for employment development does not accord with the guidance in paragraphs 96 and 97 of the NPPF.

Sport England recommend amending Table 30.0.1 to remove site allocation LI/12, or to include provision within the Plan for appropriate investment in an equivalent or better provision of sports facilities in a suitable location to accord with paragraph 97 of the NPPF, and in accordance with the evidence in the Council's Playing Pitch Strategy and Built Sports Facilities Strategy.

Policy 31: Lea Castle Village, and Policy 31.1: Lea Castle Vision - Sport England supports this proposed housing allocation which includes the provision of new and upgraded sports facilities and a primary school.

There is a strategic need for a 3G artificial grass pitch (AGP) in this area as detailed in the Playing Pitch Strategy, as currently there is no provision on that side of Kidderminster. The PPS identifies a need for 2 additional 3G pitches within the District to meet identified needs for football. The provision of land for an AGP is therefore supported by Sport England. However, the policy does not make provision for ensuring the management, operation and maintenance of the pitches which should be secured as part of the development. As set out, the policy therefore does not fully secure the proposed sports facilities in accordance with paragraph 96 of the NPPF and the evidence set out in the Playing Pitch Strategy.

Sport England therefore recommends amending part 4 of policy 31.1 to read "Retain and upgrade 3 existing grass playing pitches, provide new changing facilities, provision of car parking, provision of land for an artificial grass pitch (3G), together with an agreed financial contribution towards off-site built sports facilities, and securing on-going arrangements for the management, operation and maintenance of the new sports facilities that shall be clearly established as part of the outline planning application for the development of the site. This will ensure that the proposed new sports facilities are suitably secured in accordance with paragraph 96 of the NPPF and the evidence set out in the Playing Pitch Strategy.

Policy 32: Kidderminster Eastern Extension, Policy 32.3 and 32.4 – Sport England considers that the development of over 1400 dwellings in this allocation should make appropriate provision for new outdoor sports and recreation facilities to meet the needs of the proposed development, given the evidence in the Playing Pitch Strategy that there are current shortfalls of provision for football and rugby union and the evidence in the Built Sports Facilities Strategy regarding the need for investment in sports facilities within the catchment of this development.

The policy does not include any on-site provision for new playing field, or for the allocation of land elsewhere for new playing field to meet the needs of the proposed housing development. Sport England notes that the allocation includes provision of a new primary school which may be expected to include some playing field, however the extent to which this will address playing field needs from this development is not addressed within the policy.

In addition, the Council's Built Sports Facilities Strategy includes scenario testing to consider the demand for built sports facilities generated by this development using Sport England's Sports Facility Calculator. The strategy identifies the need to invest in improving the quality of existing sports halls and swimming pools at school sites within the catchment of this development, along with various other identified projects for new or improved sports facilities where s106 funding could be applied. Sport England considers that the policy should identify that an off-site contribution will be expected in accordance with policies 12 (strategic infrastructure) and 20C (provision for open space, sports pitches and outdoor community uses) for sports facility investment in line with the Built Sports Facility Strategy to the needs of the development.

Sport England recommends amending policies 32.3 and 32.4 to include the provision of on-site playing fields to meet the needs of the development in accordance with Policy 20C, or to require an equivalent contribution for off-site investment in accordance with policies 12 and 20C and the evidence in the Playing Pitch Strategy. Include provision for an off-site contribution towards built sports facilities in accordance with policies 12 and 20C and the evidence in the Built Sports Facilities Strategy. This will ensure that new sports and recreation facilities are suitably secured in accordance with paragraph 96 of the NPPF and the evidence set out in the Playing Pitch Strategy.

Policy 33.30: Stourport-on-Severn site allocations, Policy 33.8 Land west of former school site Coniston Crescent, Policy 33.16 School Site Coniston Crescent MI/38 – Sport England objects to the allocation of the following sites:

- LI/11 Land west of former school site Coniston Crescent – this allocation would result in the loss of an existing sports facility at the disused Burlish Golf course. The Council's playing pitch strategy does not assess the need for golf courses. No evidence has been prepared to demonstrate that the golf course is surplus to requirements to address NPPF paragraph 97(a).
- MI/38 School site Coniston Crescent – the allocation would result in the loss of existing school playing fields. The allocation of the site for residential development is contrary to the evidence in the PPS which recommends protecting and enhancing the playing field and to secure its use for the wider community to address identified needs for playing pitches. Sport England therefore considers that the evidence in the Playing Pitch Strategy demonstrates that the playing field is not surplus to requirements to meet paragraph 97(a) of the NPPF.

Sport England recommends amending Table 33.0.1 (Policy 33.30) to remove allocations LI/11 and MI/38, or to amend the wording of policies 33.8 and 33.16 to require equivalent or better provision of sports facilities in quantity and quality in a suitable location in accordance with paragraph 97(b) of the NPPF.

Policy 33.20: Mister Road Outdoor Sports Area, Paragraph 33.39 – Sport England supports policy 33.20 which encourages proposals to further develop outdoor sports facilities at the existing sports hub site. However, the policy does not sufficiently set out how this will be achieved, nor does it reference the Playing Pitch Strategy nor the Built Sports Facilities Strategy. Sport England recommends amending policy 33.20 and the associated reasoned justification in paragraph 33.39 to identify that the proposals will be delivered via developer contributions and other funding sources in

accordance with the Playing Pitch Strategy and Built Sports Facilities Strategy in order to ensure that the policy is consistent with paragraph 96 of the NPPF.

Worcestershire County Council – Place Partnership

WCC Place Partnership welcomes and supports the proposed allocation of Naylor’s Field (FPH/18) for 35 dwellings. WCC confirm that the site has been officially declared surplus to educational requirements and is available immediately for development. WCC Place Partnership consider a development of 35 class C3 dwellings would be very much in-keeping with the existing residential area in which it would be situated. The proposed allocation of Naylor’s Field clearly represents the effective use of land held in public ownership to deliver much needed new homes in the District, as envisaged and supported by Chapter 11 (paragraphs 117-123) of the NPPF (2018). This in turn helps support the delivery of the Government’s objective of boosting the supply of homes (paragraph 59) and helps the Council to plan for a mix of housing in the District for different groups (paragraph 61).

Policy 33 and 33.9 – paragraph 33.16 – The County Buildings sites in Stourport-on-Severn (MI/1) provides a very significant brownfield regeneration opportunity in the town. WMP are in the process of moving out of the County Buildings site and re-location to the Stourport Civic Centre. This will be completed by Spring 2019. The other two occupiers are subject to leases that expire by the end of 2021, whereupon the whole County Buildings site will become available for redevelopment. This confirms that new housing can be delivered within the next five years, as recognised by the conclusion of the District Council’s Housing and Economic Land Availability Assessment 2016 (updated October 2018) on the site. WCC Place Partnership concludes that the site will be fully available for redevelopment from the beginning of 2022 onwards. WCC therefore supports the District Council’s assessment of the site alongside Policies 33 and 33.9, which allocate the site for 40 dwellings. WCC also support the fact that the total given is specified as being indicative, as there may well be potential for more dwellings at the site. This can be tested appropriately at the planning application stage.

The Coal Authority

The Coal Authority supports the inclusion of ‘Policy 16A – Pollution and Land Instability’, which identifies that where land stability is identified it should be fully addressed as part of the development.

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:

Chaddesley Corbett Parish Council

Chaddesley Corbett Parish Council does not consider the Local Plan to be ‘sound’ because Policy 6B allocates sites for development in Villages washed over by the Green Belt without establishing that there are any exceptional circumstances that would justify it. The Parish Council also objects to site WFR/CC/8 Fold Farm being allocated for housing development. The Parish Council recommends that site WFR/CC/8 is withdrawn from the draft Local Plan, so that it does not prejudice or pre-empt the Parish Council’s review of their Neighbourhood Plan.

Bewdley Town Council

The proposed housing allocation sites for Bewdley are supported by Bewdley Town Council. The establishment of a Severn Valley Regional Heritage Park to link the historic towns and landscape (Policy 11C – B) is also supported by the town council.

The following key issues were raised:

Policy 34.1 – Bewdley Fire Station BR/BE/1 – is allocated for the development of residential apartments (15 dwellings). Bewdley Town Council do not think the policy addresses traffic management issues which will arise from additional vehicle use in this already congested area.

Additional traffic congestion – Proposed site allocations for Bewdley at the Stourport Road triangle (100 dwellings – WA/BE/1), Catchem’s End (75 properties – WA/BE/3), and Land south of Habberley Road (35 properties – WA/BE/5) will exacerbate existing traffic problems and make congestion in this area far worse. The proposed Local Plan acknowledges traffic congestion but offers no permanent solution to address the problem.

Flood zone – Land south of Habberley Road – Environment Agency Flood Zones maps for Bewdley indicate that the proposed location on land south of Habberley Road (WA/BE/5) for an indicative number of 35 dwellings is classified as a Medium/Low Risk Flood Zone. Viability and suitability for sustainable housing on this land is therefore questionable. Bewdley Town Council consider that this land would be better suited for provision of a link road between the A456 Bewdley to Kidderminster road and the B4190 Habberley Road, i.e. linking to the existing Mercure Hotel entrance road, thereby enabling one main exit onto this already busy road. This proposal would ease traffic congestion, reduce the need for high cost water management and improve the local road infrastructure. However, the need should be weighed against the loss of valuable Green Belt land, the potential increase in noise/decrease in air quality caused to residents in New Road, the impact of additional traffic entering Habberley Road/Kidderminster Road and the impact on the green infrastructure around the Mercure Hotel.

Wolverley and Cookley Parish Council

Wolverley and Cookley Parish Council voted in support of the Wyre Forest District Local Plan review Pre-Submission Publication.

Kidderminster Foreign Parish Council

Legally Compliant / Positively Prepared – The Parish Council contend that the District Council has been negligent in advertising this Local Plan Review to the district electorate. Not everyone has access to the local Kidderminster Shuttle or Local Press (and there are no deliveries of this in the parish), nor do residents in the parish have access to the internet. Leaflets (A5 glossy leaflets) were not received by parishioners. The Parish Council asks the question “How are local people to know about the Review and developments planned if the District is negligent in advertising these to ALL the people in the district, and not just those in the towns?” The Parish Council therefore challenge the statement that this Review was either legally compliant or indeed positively prepared as many of the district electorate, particularly those in this parish, were unaware of the Review and its implications.

Justified – the Parish Council feel that the proposed development WA/KF/3 for Low Habberley is not “an appropriate strategy” to meet the housing needs of this area. Whilst the Parish Council understands the need for affordable housing as starter homes for young couples, they feel that there are other more appropriate sites within the district (particularly brownfield sites, and the town centres), where there are opportunities to provide sufficient and more suitable housing. The Parish Council consider the proposal to develop site WA/KF/3 is particularly unsuitable as it comes within a couple of hundred yards of the village boundary of Low Habberley, and will swamp the village, being more than double the number of dwellings, and irrevocably change the total character of this small rural village. The Parish Council also object on Green Belt grounds, claiming that the site does not comply with at least 3 (possibly 4) of the Green Belt five purposes, as set out in the NPPF.

The Parish Council also object by adding that this proposed development is on the wrong side of the urban area of Kidderminster whereby access to the West Midlands Conurbation would prove difficult. A high proportion of district inhabitants commute to the larger industrial areas of Stourbridge or Worcester, and development of this site would mean that the supporting road infrastructure is not in place to take commuting traffic away from the town centre areas.

The Parish Council are unanimous in objecting to development of site WA/KF/3. Apart from the fact that this land provides an important buffer between the town and the village of Low Habberley, it is also agricultural land with the valuable addition of irrigation. The agricultural output on these fields, therefore, on this site is significantly enhanced by this irrigation feature, and in recent years has provided valuable onion and salad crops – which may be in short supply after Brexit. The Parish Council therefore feel that it is in the national interest that such land is kept in production for the good of the country as a whole, when other more suitable unproductive sites for housing development could be chosen.

Churchill and Blakedown Parish Council

Policy 31 – Lea Castle Village

The Parish Council are concerned with Lea Castle and other developments that they consider to result in increased traffic through Churchill and Blakedown. The Parish Council do not think the draft plan shows any consideration for highway infrastructure in terms of roads or public transport. They have concerns regarding the sustainability of those projects, without the necessary infrastructure.

The Parish Council does not object in principle to the house building proposals but has major concerns regarding traffic on the A456. They raise concerns about how commuters will get from Lea Castle to the A456 and Blakedown Station. The Parish Council does not believe that one-track rural roads are suitable to take traffic from these developments. The increase in traffic from elsewhere coming through Blakedown needs to be considered. There are currently major tailbacks on both the Birmingham and Worcester Roads at Hagley.

The Parish Council requests that its concerns regarding lack of plans regarding major traffic infrastructure, especially in relation to transport, be noted and it requests input to future discussion on plans to alleviate the problems which will be caused by developments outside the Parish boundary. They have also submitted a ‘Transport Technical Note’ with their response.

Rock Parish Council

Rock Parish Council support the proposals generally with the following caveat and objection:-

- The Parish Council endorsed the proposed changes to the settlement boundaries for Far Forest, Bliss Gate, Rock, Callow Hill and Clows Top.
- The Parish Council support the Policy 36.2 relating to Alton Nurseries at Long Bank (BR/RO/210) having previously supported planning approval for 4 dwellings under planning application no: 18/0413/FULL. The Parish Council firmly believes that the remainder of the site should be used for Employment Use only.
- The Parish Council considered Policy 36.1 at Lem Hill Nurseries (BR/RO/2) and conclude that this site has never previously been considered publicly and the Parish Council resolve to totally oppose this site moving forward in the process. The Lem Hill Nursery site is completely outside the Wyre Forest District Council settlement boundary and has poor access off the busy A4117. The land suffers from surface water flooding in bad weather. A previously proposed development along New Road has been dropped due to local unrest and objections. The local primary school is over subscribed and the site is landlocked for any possibility of future expansion. Development on this site would put severe pressure on the Education Authorities in finding placements in schools outside of the parish boundary. The Far Forest does not have good local amenities for a village of its size and adding up to 20 dwellings would add severe pressure on the already over stretched doctors surgery and dental practices. Finally, the Parish Council believes there has been no locally identified need for this proposal and it does not comply with the Parish Plan or the Housing Needs Survey. Rock Parish Council unanimously opposed this site being carried forward.

Stone Parish Council

Stone Parish Council are supportive of the proposals in the Local Plan pre-submission document.

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:

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.

4d) Other Non-Resident Representations – Key Issues

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

Worcestershire Wildlife Trust

Policy 6D – Strategic Allocation Sites

WWT notes the substantive changes to these allocations. In particular WWT are pleased to see the revisions proposed for the Kidderminster East site (Part ii), which allay most of WWT's previous concerns regarding this allocation. Reducing the overall size of the allocation, removal of the eastern

relief road, limiting the allocations proximity to designated ecological assets and making use of the GI Concept Plan to deliver positive enhancements should all help to make the allocation sound in terms of relevant NPPF policy.

Policy 8G – Site Provision for Travelling Showpeople

WWT support the removal of the previously proposed site at Heath Lane, Stone from this policy. The Heath Lane site posed significant risks to ecological receptors including Corn Buntings (listed under S41 of the NERC Act 2006) and therefore its retention in policy would have made the policy's soundness questionable, particularly in relation to its consistency with national policy on biodiversity.

Policy 11D – Protecting and Enhancing Biodiversity

WWT welcome this policy and consider that it is both legally compliant and sound. In particular we consider that the policy meets the requirements of the NPPF and also responds appropriately to the Government's ambitious 25-year Environment Plan. In this regard, the commentary on the mitigation hierarchy, protecting ecological networks and embedding the need for measurable net-gains in biodiversity are all particularly relevant, necessary and welcome.

Policy 14 – Green Infrastructure

WWT welcome Policy 14 and consider that it is both legally compliant and sound. In particular, WWT consider that the policy meets the requirements of the NPPF and also responds appropriately to the Government's ambitious 25-year Environment Plan. Embedding GI in the heart of development is essential if the level of growth proposed is to deliver the full range of social and environmental benefits available. WWT are especially pleased to support the commentary regarding the GI Concept Plans.

Policy 15D – Sustainable Drainage Systems

WWT welcome Policy 15D and consider that it is both legally compliant and sound. In particular, WWT consider that the policy meets the requirements of the NPPF and also responds appropriately to the Government's ambitious 25-year Environment Plan. Requiring SUDs that deliver biodiversity and GI improvements is in line with these documents and offers considerable benefits to the environment and the communities which utilise new development. The local plan offers a unique opportunity to properly embed SUDs in GI and GI benefits into SUDs, an opportunity that would otherwise be missed to the detriment of the environment and the public.

Policy 28C – Equestrian Development

WWT welcomes Policy 28C and considers that it is both legally compliant and sound. In particular, WWT consider that the policy meets the requirements of the NPPF and also responds appropriately to the Government's ambitious 25-year Environment Plan. The provisions of Part B are particularly necessary given the considerable capacity of this sort of development to have adverse impacts on semi-natural grasslands, for which Worcestershire is especially important.

Policy 30 – Kidderminster Town

WWT consider that this policy is both legally compliant and sound. WWT consider that it meets the requirements of the NPPF and also responds appropriately to the Government's ambitious 25-year Environment Plan. In particular, WWT note the deletion of site FPH/1 Settling Ponds from the allocations, which WWT consider to be essential if the policy is to be considered sound. WWT had previously objected to this allocation because the council has a statutory duty to take steps to protect and where possible enhance the adjacent SSSI and WWT could not see how this duty could be properly discharged if FPH/1 were to be allocated.

Policy 31.1 – Lea Castle Village Vision

WWT note this policy and consider that it is both legally compliant and sound. In particular, WWT consider that the policy meets the requirements of the NPPF and also responds appropriately to the Government's ambitious 25-year Environmental Plan, especially through welcome reference to the need for development here to deliver biodiversity net-gain (as set out in parts 5, 6 and 7). These requirements will be fundamental to delivering sustainable development that is consistent with national policy on this site.

Policy 31.2 – Lea Castle Village Principles of Development

WWT note this policy and consider that it is both legally compliant and sound. In particular, WWT consider that the policy meets the requirements of the NPPF and also responds appropriately to the Government's ambitious 25-year Environment Plan, especially through welcome policy requirements for biodiversity net-gain, the need for development here to meet high GI standards (measured by accepted methods in 'Building with Nature') and the need for development to be guided by the Lea Castle GI Concept Plan. In addition WWT support the specific policy requirements set out in parts 9, 12, 13, 14 and 17-24. These requirements will be fundamental to delivering sustainable development that is consistent with national policy on this site.

Policy 32 – Kidderminster Eastern Extension

WWT note this policy and consider that it is both legally compliant and sound. In particular, WWT consider that the policy meets the ecological requirements of the NPPF and also responds appropriately to the Government's ambitious 25-year Environment Plan. In particular WWT welcome the deletion of some development parcels that were proposed in the previous consultation document. Allocations at BW4 and OC4 were likely to have significant impacts on the nearby Hurcott and Podmore Pool SSSI, creating potentially serious conflicts with national policy on the environment, and so their removal is welcome and in line with the background evidence base, SA findings and wider biodiversity policy. In addition, WWT welcome the commentary on the use of the Kidderminster East GI Concept Plan in the RJ to this policy.

Policy 32.4 – Site Specific Principles of Development

WWT note this policy and consider that it is both legally compliant and sound. In particular, WWT consider that the policy meets the ecological requirements of the NPPF and also responds appropriately to the Government's ambitious 25-Year Environment Plan. In particular, WWT support the requirements set out in parts b, e-i, k-o, q, s and t. Taken together these requirements respond

effectively to national policy drivers and reflect current NPPF guidance. The need to demonstrate how development has been guided by the Kidderminster East GI Concept Plan and how GI layouts match expectations in accepted standards such as 'Building with Nature' is very welcome by WWT. Use of these mechanisms should help the development to enhance local ecological networks and deliver net-gain in biodiversity in line with the NPPF.

Policy 33 – Stourport-on-Severn Allocations

WWT object to the site allocation at Yew Tree Walk (AKR/18). WWT believe this site cannot be delivered in a manner consistent with national policy. Accordingly, WWT do not consider that the proposed allocation is sound.

Policy 33.6 – Yew Tree Walk (AKR/18)

WWT are concerned that this allocation cannot sustain the high numbers of dwellings proposed. Capping of the landfill will effectively remove all the semi-natural habitat within the site boundary, making buffering and augmentation of the nearby ecological receptors and protection of reptiles (a requirement set out in the associated ecological appraisal) extremely challenging. Moreover, it does not seem likely that enough suitable habitat could be retained on site to maintain the population or reptiles, or indeed other wildlife, likely to be present. Coupled with the potential adverse impacts on the local ecological network, including nearby designated sites, these matters suggest to us that development on the scale proposed cannot be delivered in a manner consistent with national policy, especially in light of the fact that this site falls within the Green Belt. Accordingly, WWT do not consider that the proposed allocation is sound.

Policy 34 – Bewdley Site Allocations

WWT note and welcome the deletion of the previously proposed allocation at Highclere (BR5/BE6), a site that gave WWT considerable cause for concern during the previous consultation because of the high risk of adverse effects on nearby ecological receptors.

Policy 36 – Villages and Rural Areas Site Allocations

WWT welcome this policy and consider that it is both legally compliant and sound. In particular, WWT consider the policy meets the requirements of the NPPF and also responds appropriately to the Government's ambitious 25-year Environment Plan. WWT raised a number of queries regarding some of the proposed rural sites at the previous plan stage on the grounds that their inclusion did not appear to be supported by the required evidence base. Updates to the background environment evidence base and SA have been very helpful and WWT welcome the fact that some sites have been ruled out because they cannot be made compatible with the requirements of Government policy in relation to the environment and biodiversity in particular.

Table 3.0.2 - Aims and Objectives

WWT note the text in bullet point seven regarding the need to safeguard and enhance the district's biodiversity. Protecting and enhancing the natural environment is an essential requirement in delivering a sound local plan and WWT fully support the inclusion of this important wording.

Sustainability Appraisal and the background Evidence Base to Local Plan

WWT note that considerable additional work has been completed in relation to the Sustainability Appraisal (SA) since the previous round of consultation. This is very welcome by WWT and they consider that the findings of the SA now more accurately reflect the likely implications of policies and allocations in the Submission Document. Accordingly, WWT now believe that the SA is fit for purpose, legally compliant and sound.

WWT note that considerable additional work has been completed in relation to the environmental evidence base underpinning the Local Plan since the previous round of consultation. In particular, the 'Preliminary Ecological Appraisal of potentially ecologically sensitive sites on WFDC's list of sites for allocation' (and its addendums) has apparently helped the council develop a much better understanding of the ecological implications of site allocation choices. This is welcomed by WWT and they consider that the findings presented have helped to underpin sound decisions (with the exception of site allocation AKR/18 Yew Tree Walk). Accordingly, WWT consider that the ecological evidence base is now both legally compliant and sound.

National Federation of Gypsy Liason Groups

Policy 8 – The National Federation of Gypsy and Liason Groups consider this policy not to comply with the NPPF as it fails to address the requirement to allocate sufficient land to meet the need for Traveller sites for at least a five year period. Furthermore, they consider the policy to be too restrictive. As and when applications for Traveller pitches are received, they should be dealt with in accordance with a realistic policy. Restricting sites to those which are “on previously developed land or in areas allocated primarily for residential development subject to all relevant policies” will effectively prevent any sites being acceptable since sites which comply with this restrictive policy will be equally acceptable for mainstream housing and will thus inevitably be beyond the reach of Travellers. The NFGLG states that given the shortfall in allocated sites it is essential that the policy is sufficiently flexible to ensure that “windfall” sites come forward and are approved. That will not happen on the basis of the policy wording at present.

4e) Petitions and Residents Groups – Key Issues

A total of 2 petitions (with signatures) and 2 responses from resident groups were submitted to the Council in relation to the plan. The petitions and resident group responses submitted are shown in the table below and include the site it is in relation to.

Petition / Resident Group	Sites	Details
Friends of Patricks Field (Petition)	Yew Tree Walk (AKR/18)	193 signatures.
Low Habberley Petition	Land at Low Habberley (WA/KF/3)	25 signatures.
Bewdley Say No to Gladman		Residents group – no signatures.
Burlish Concerned Residents Group	Land west of former school site Coniston Crescent (LI/11)	Residents group – no signatures.

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

Friends of Patricks Field (Petition) – Key issues:

- The Local Plan Review does not provide a valid justification for removal of the site from the Green Belt as required by NPPF 2018.
- There are significant contradictions in the document and both the Landscape and Ecological statements indicate that the site makes a significant contribution to four of the five purposes of the Green Belt and a contribution to the fifth.
- The proposed development of site AKR/18 will add quite significant numbers to the current traffic congestion.
- The Plan tells us that the housing target figure is 5500 units with a contingency of 825 units (15%). As the number of units in the Plan appropriate to AKR/18 is 85 units, the contingency reduces to 13.5%. This would still exceed the DCLA standard.
- There are 16 housing sites in Stourport under consideration, excluding AKR/18. It becomes apparent that to maintain the 15% it is necessary to spread 85 at a little over 5 per site. As some of the sites are quite small this statement is a generalisation but brings the requirement in to perspective. As in most cases developers request a change in numbers, post approval due to a change in market, it is not unreasonable to assume that the 1.5% loss overall will quickly be replaced.
- The group believe the District Council have not demonstrated the requirements of the NPPF Section 13 by proving that this Green Belt site is essential to their calculations given the other safeguards required in that section.
- Despite statements at a number of locations through the District Local Plan there has never been a sand and gravel working at the location of AKR/18. This information is confirmed in a number of places through the response submitted to the Council and by maps and an aerial photograph.
- The group are concerned for the ecology/biodiversity on site.
- The site is well used by local residents for recreational purposes and has been for many years.
- Concern for traffic issues if the site were to be developed.
- Land stability of the site is questionable.

The Friends of Patricks Field residents group submitted a petition (193 signatures) and also submitted documentation to support their submission, which will be made available to the Planning Inspector.

Low Habberley (Petition) – Key issues:

- The petition is against the site at Low Habberley (WA/KF/3).
- Traffic concerns have been raised in relation to this site due to present traffic conditions, challenging access to and from existing residential areas which will be compounded by proposed site build.
- The B4190 has a number of issues already in existence, speed of traffic and volume. It can be witnessed on a daily basis with traffic being backed up from the island on Low Habberley road past the present turning to the Habberley estate down towards Bewdley.

- Residents attempting to leave Hillside Drive and the Habberley estate have tremendous difficulty due to traffic levels and this proposed build would make the access to Hillside in particular incredibly difficult.
- Volumes of traffic on B4190 Habberley Road also impact Low Habberley and access onto the Ferndale estate which if planning were to go ahead could prove to be a 'rat run' for commuters increasing risk to residents in particular elderly and school children that already need to cross the very busy B1490 road to access services.

Bewdley Say No to Gladman (Resident Group) – Key issues:

- BSNRG welcomes the opportunity to support the Pre-Submission Publication (October 2018) of the Wyre Forest District Local Plan.
- The Plan is sound, justified and consistent with the needs of the Wyre Forest District; as well as compliant with the NPPF.
- Policies 6B and 6E are fully supported.
- The sites shown in the section 34 policies are considered to be the most appropriate for future growth.
- The group consider that Policy 16A will safeguard the Welch Gate area of Bewdley from further deterioration due to inappropriate development.
- Bewdley has a range of visually distinctive landscape settings which are of great interest and value to residents and visitors alike. This aspect of landscape value has recently been confirmed by the Appeal decision (reference APP/R1845/W/17/3173741) on land at the top of the western slope of the Severn Valley as it changes from the rolling topography of older, more resistant rocks (Carboniferous in age) to the flatter landscape where softer rocks (Triassic) predominate to the south-east. This occurs due to the underground presence of a significant fault line which has effectively created this geological juxtaposition and deserved to be recognised as part of policy 11E. In addition, policy 11C concerning Landscape Character and Severn Valley Regional Heritage Park, is of significant relevance to the continued appreciation of Bewdley's highly valued and distinctive landscapes.

Burlish Concerned Residents Group (Residents Group) – Key issues:

- The residents group includes approximately 50 residents of Burlish Park Estate who wish to speak as one voice to register their objection to the site 'Land west of former school site Coniston Crescent' (LI/11).
- The group feel they have not been given adequate time to consult on and object to the site as part of the Local Plan Review process. They are therefore dissatisfied with the consultation process.
- Development of site LI/11 would impose unacceptable pressure on local infrastructure; specifically roads and road junctions.
- They consider that alternative sites nearby in the same geographical area as this site was included earlier in the gestation of the Local Plan but have now been removed. Site LI/11 will utilise the exact same roads and junctions and will inflict similar, unacceptable pressure on them as were the cause of sites being withdrawn from the Local Plan earlier in the process.

- While this site was within the green belt and allocated for sporting use it was managed as a golf course which allowed a number of sensitive species to colonise the land including skylarks.

5) Responses received to Policies in the Local Plan Pre-Submission Publication Document (October 2018)

The following graphs show the number of responses received for each of the policies within the Pre-Submission Publication consultation document. Within those responses the graphs also show:

- Number that considered the plan to be Legally Compliant
- Number that considered the plan was not Legally Compliant
- Number that considered the plan to be Sound
- Number that considered the plan to be Unsound
- Number that considered the plan complied with the Duty to Cooperate
- Number that considered the plan did not comply with the Duty to Cooperate
- Number who proposed Modifications to the plan

Summaries of responses to each chapter of the document can be found at Appendix 3.

Chapters 1-4

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

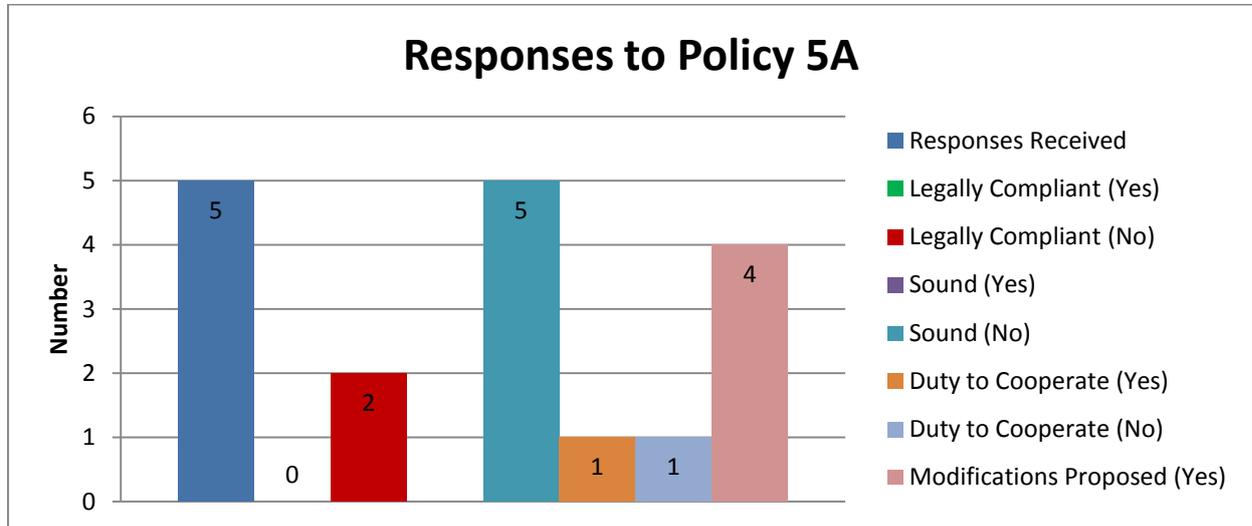
1. Introduction and Context
2. Key Issues and Challenges
3. Vision for the Area in 2036
4. Core Policies Introduction

A summary of the responses received for these Chapters can be found at Appendix 3 of this document.

Chapter 5 - Overarching Sustainable Development Principles

The policies contained within this Chapter are:

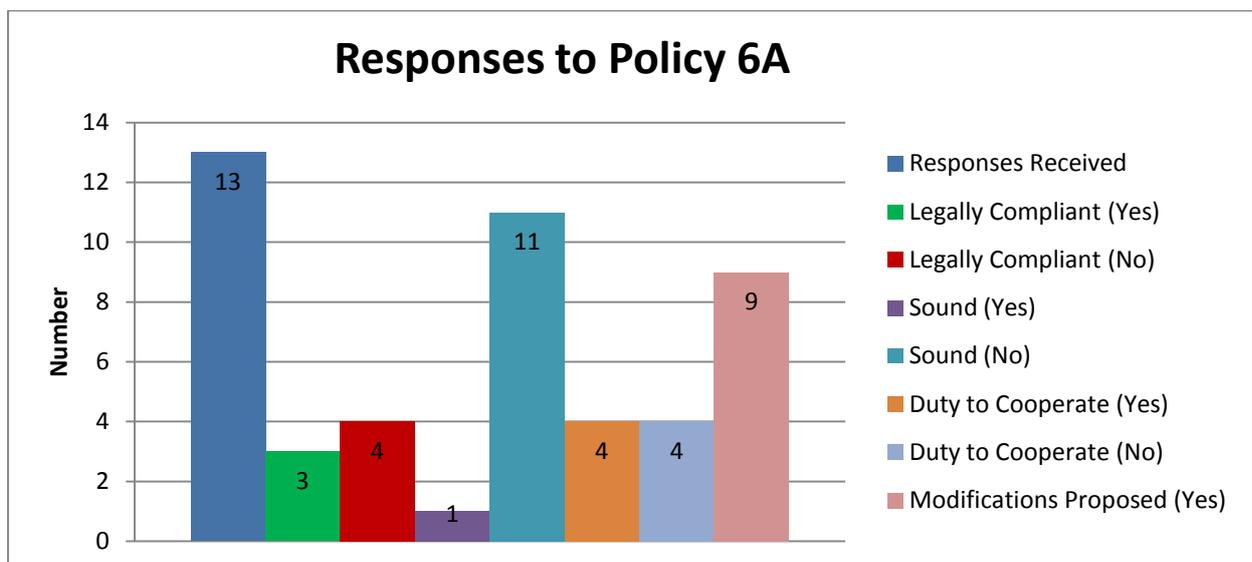
- Policy 5A – Sustainable Development

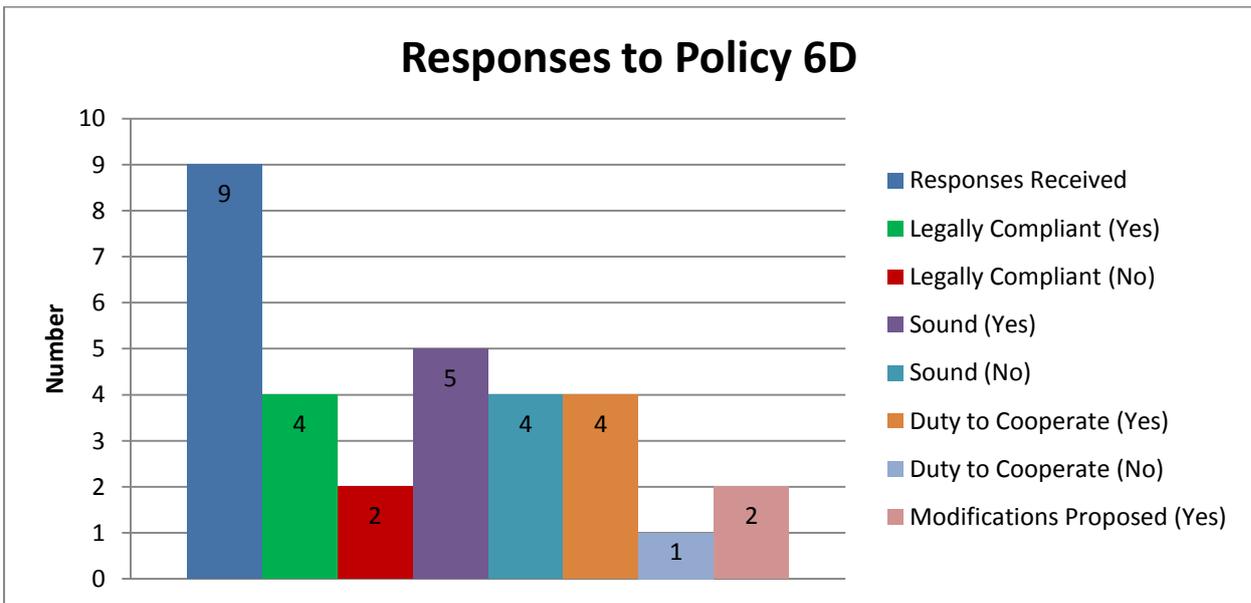
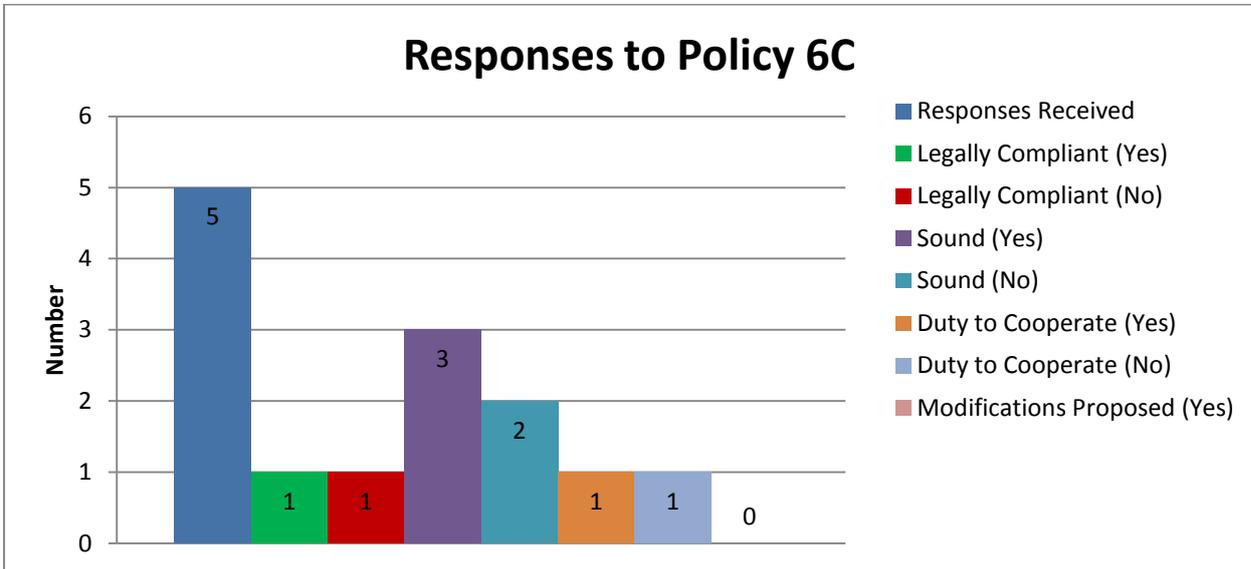
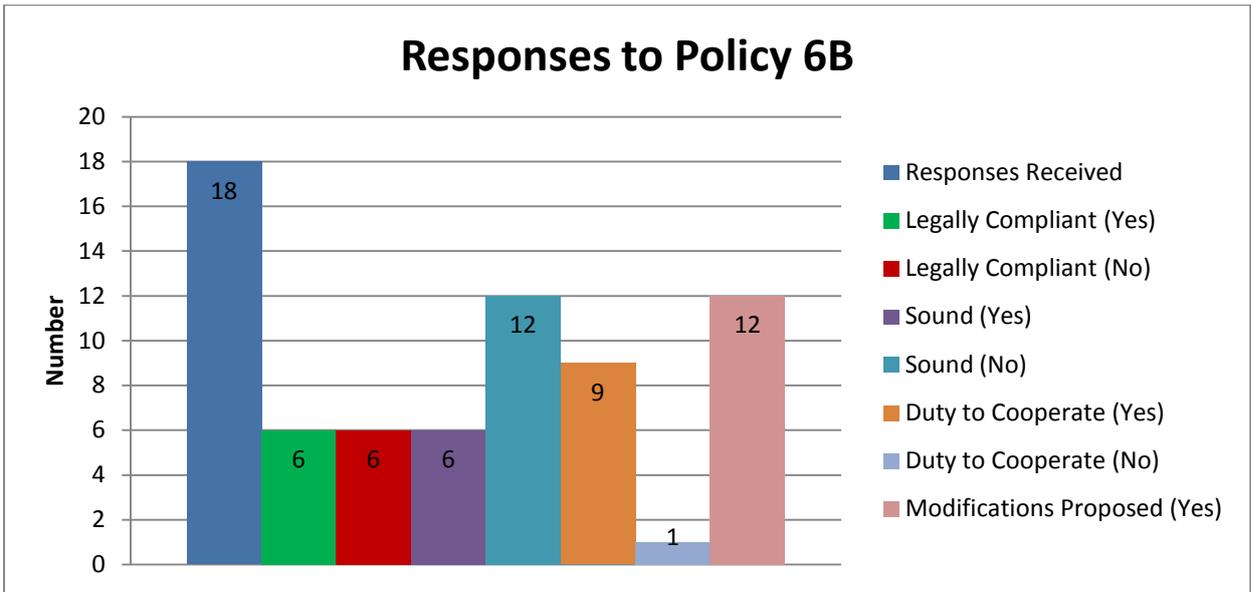


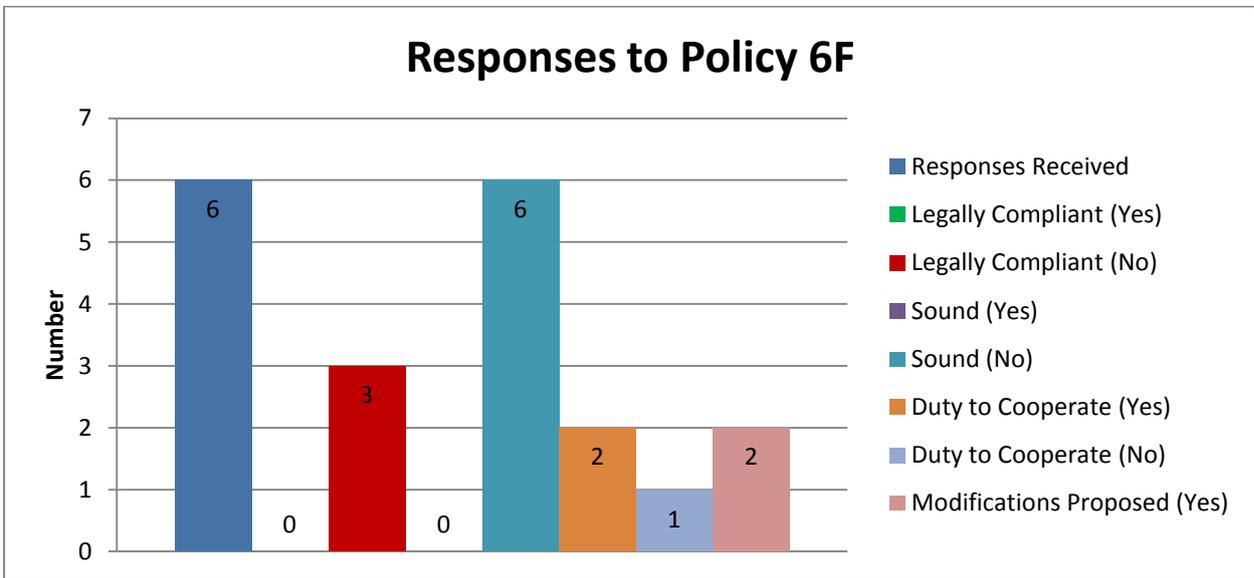
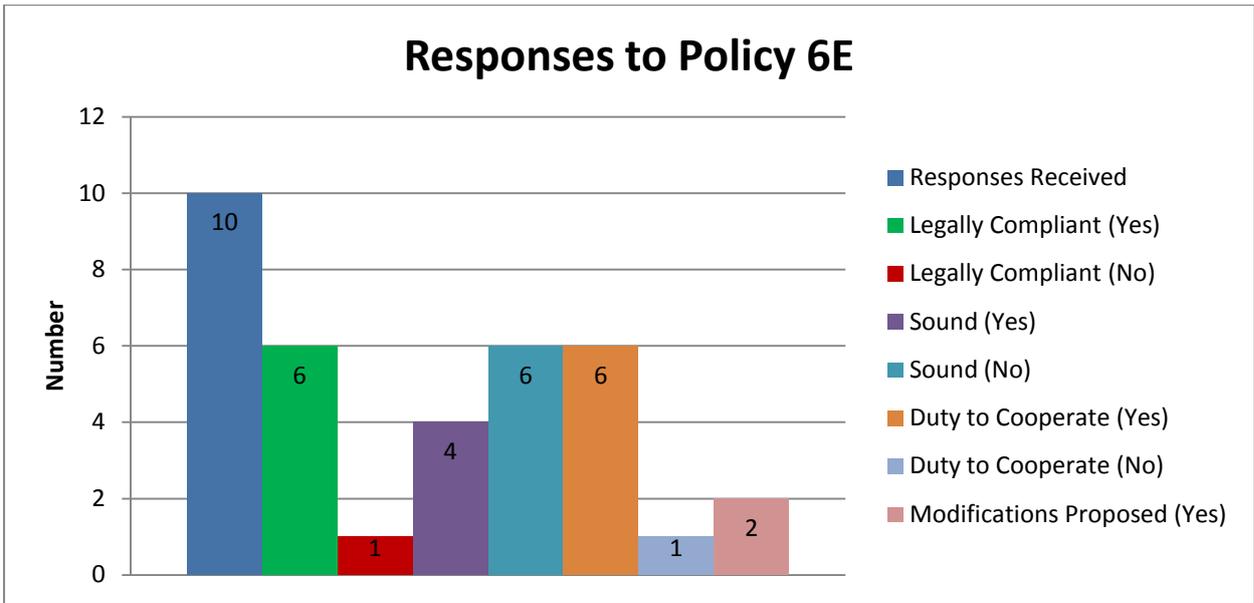
Chapter 6 – A Sustainable Future- Development Strategy

The policies contained within Chapter 6 are:

- Policy 6A - Development Needs 2016 - 2036
- Policy 6B - Locating New Development
- Policy 6C - Kidderminster town as the strategic centre of the District
- Policy 6D - Strategic Allocation Sites
- Policy 6E - Role of Stourport-on-Severn and Bewdley as Market Towns
- Policy 6F - Role of the villages and rural areas



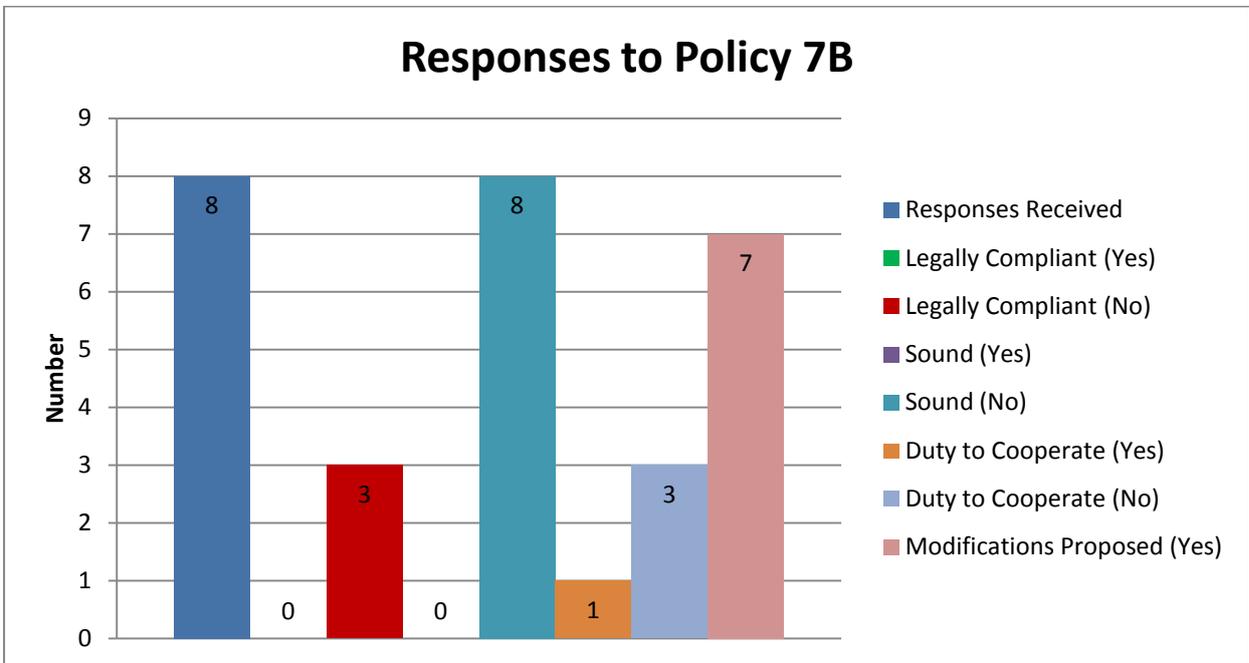
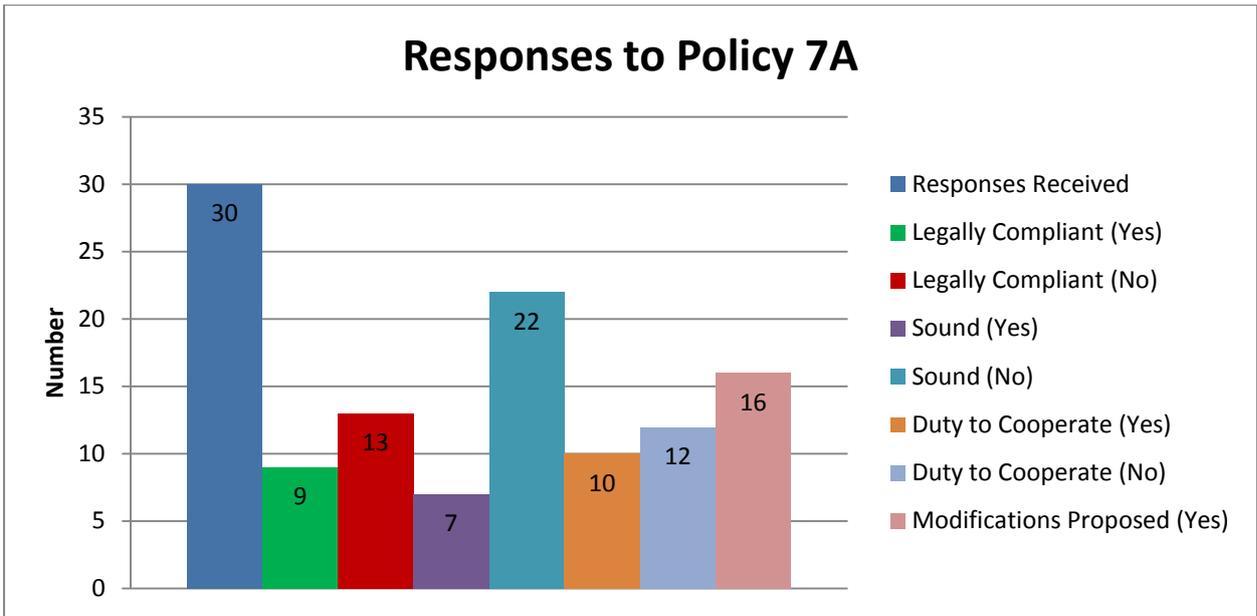




Chapter 7 – Strategic Green Belt Review

The policies contained within Chapter 7 are:

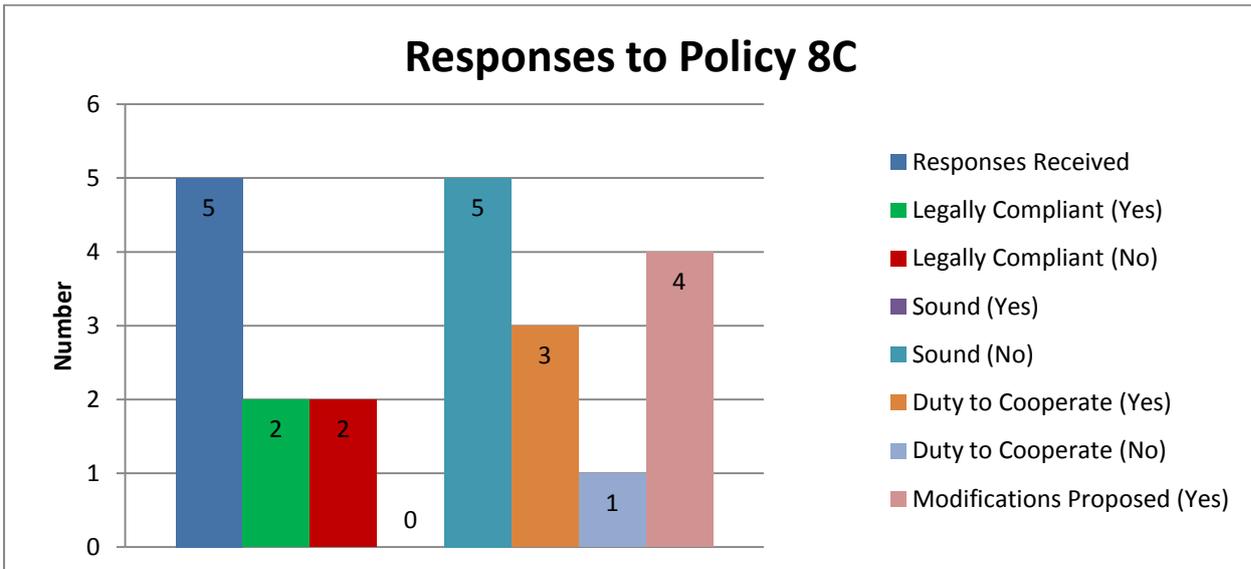
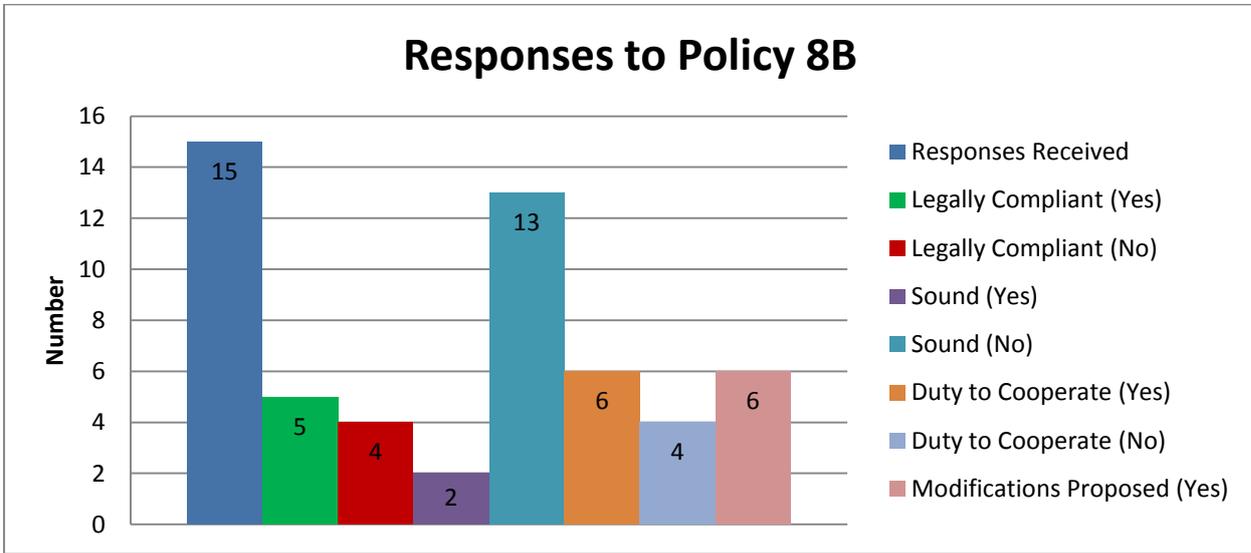
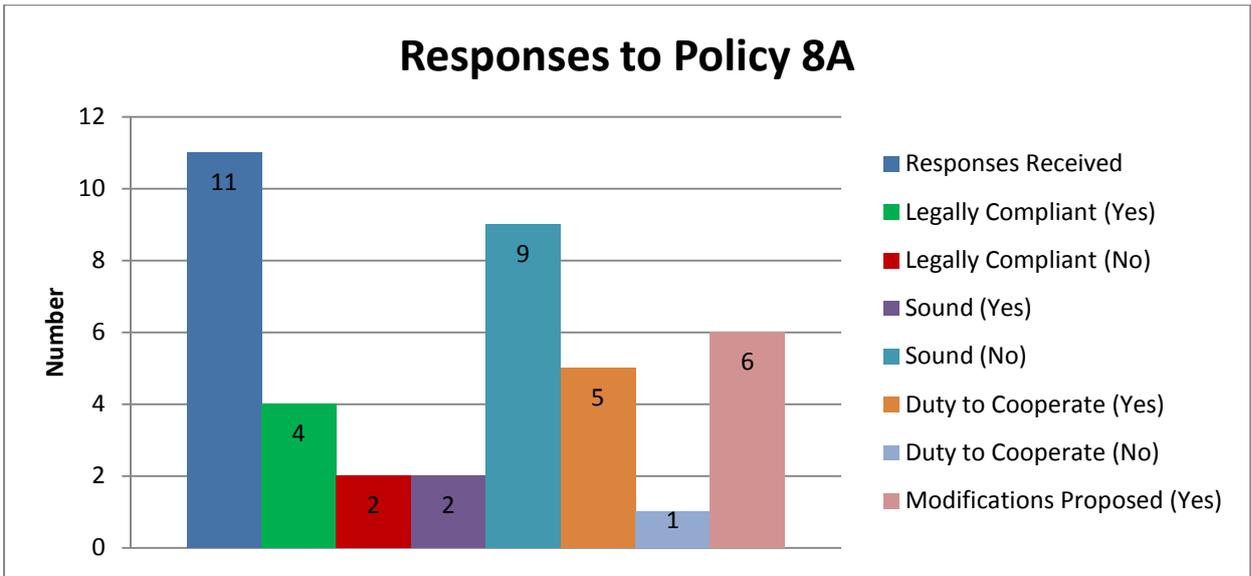
- Policy 7A - Strategic Green Belt Review
- Policy 7B - Reserved Housing Sites in the Green Belt

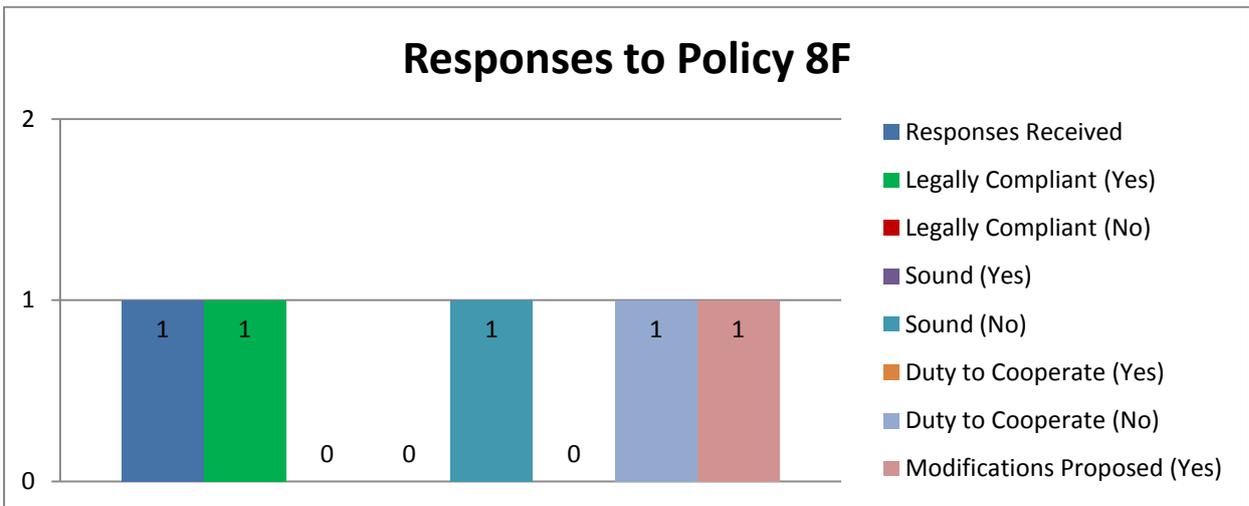
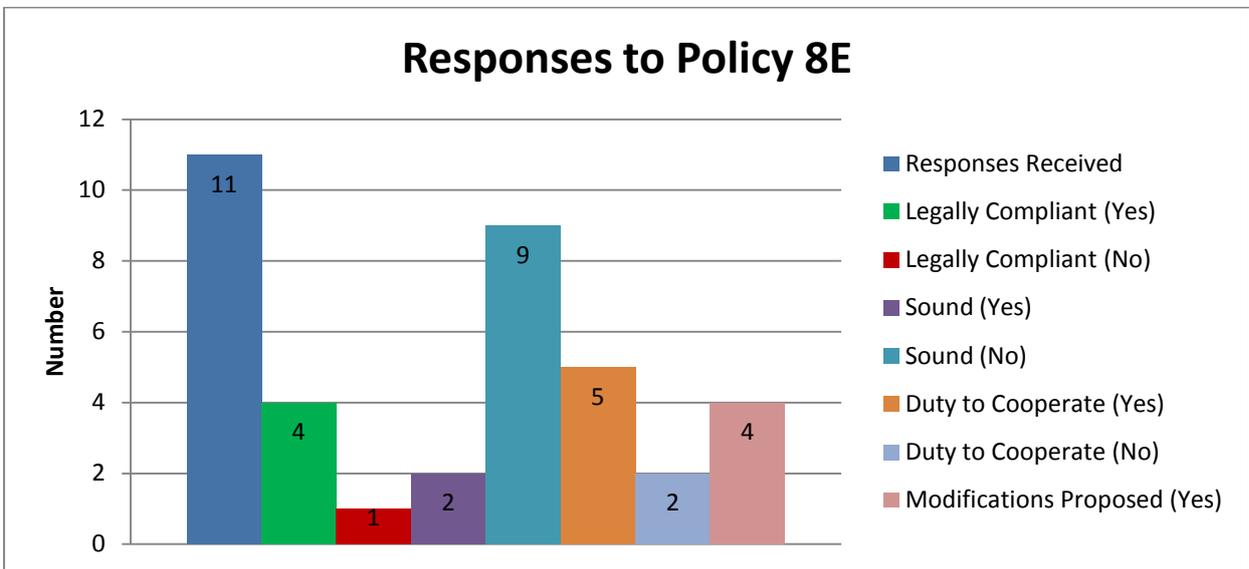
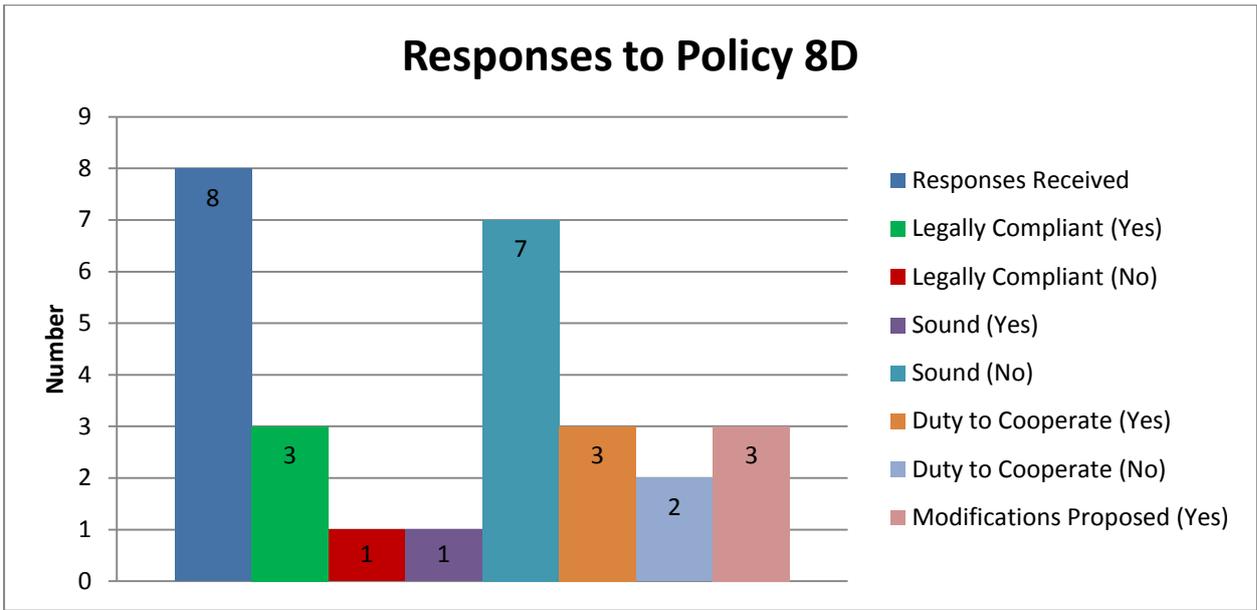


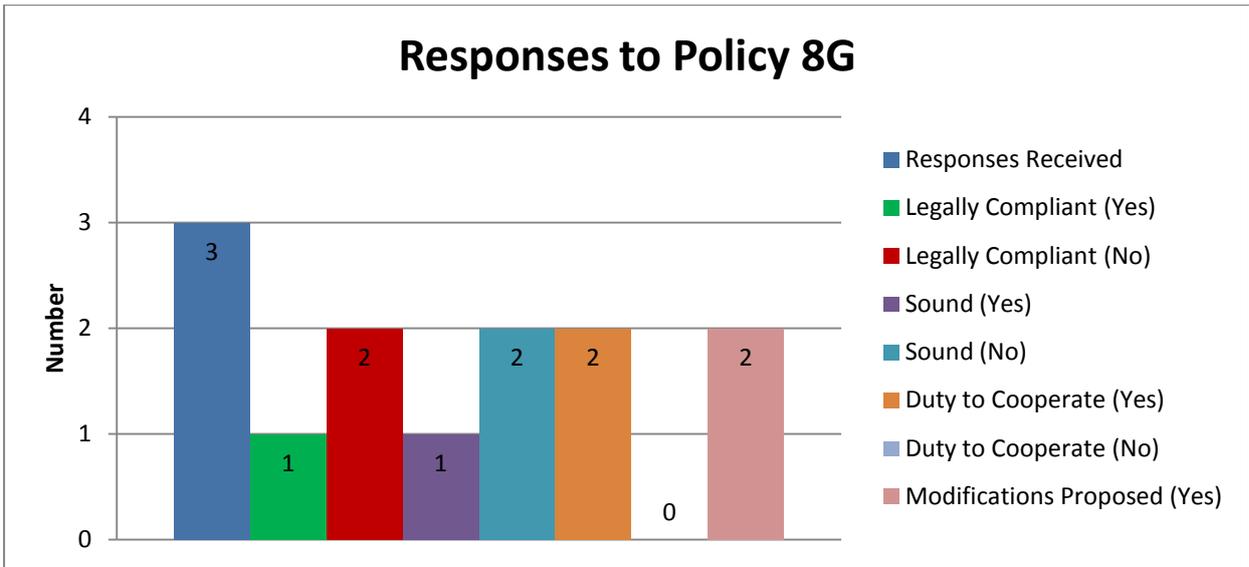
Chapter 8 – A Desirable Place to Live

The policies contained within Chapter 8 are:

- Policy 8A - Housing Density & Mix
- Policy 8B - Affordable Housing Provision
- Policy 8C - Addressing Rural Housing Needs
- Policy 8D - Self Build and Custom Housing
- Policy 8E - Housing for Older People and others with special housing requirements
- Policy 8F - Gypsy and Traveller Site Provision
- Policy 8G - Site Provision for Travelling Showpeople



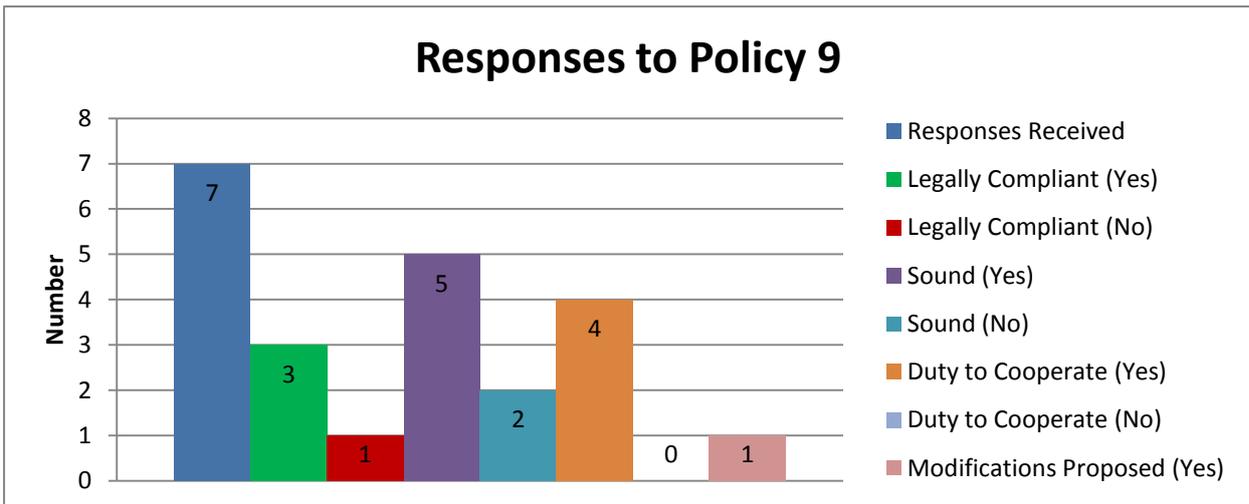




Chapter 9 – Health and wellbeing

The policies contained within Chapter 9 are:

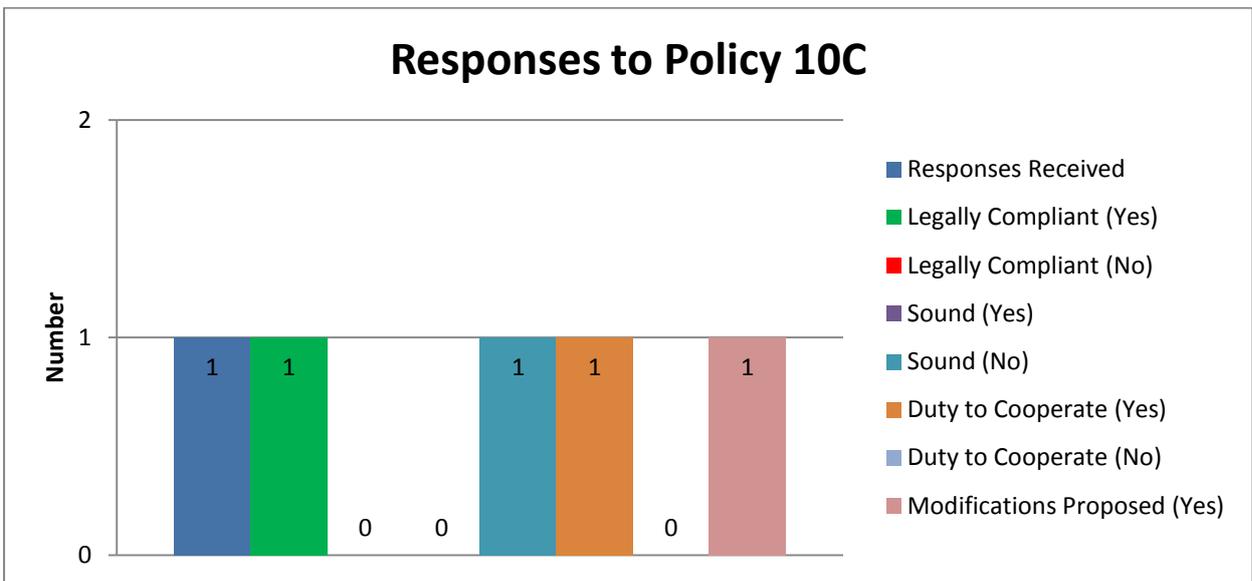
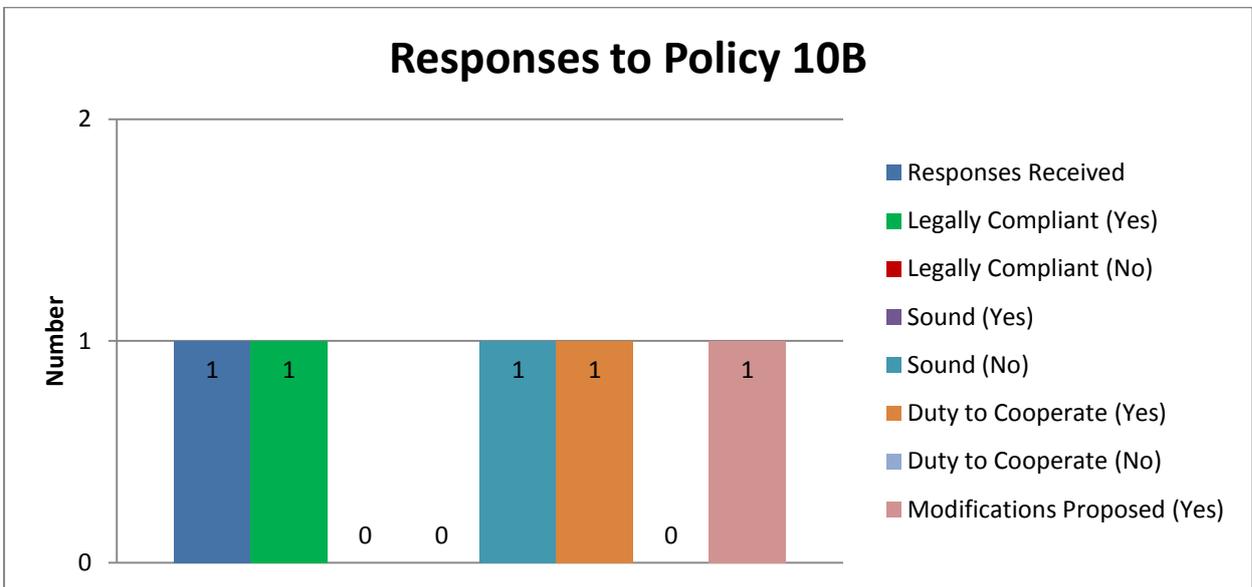
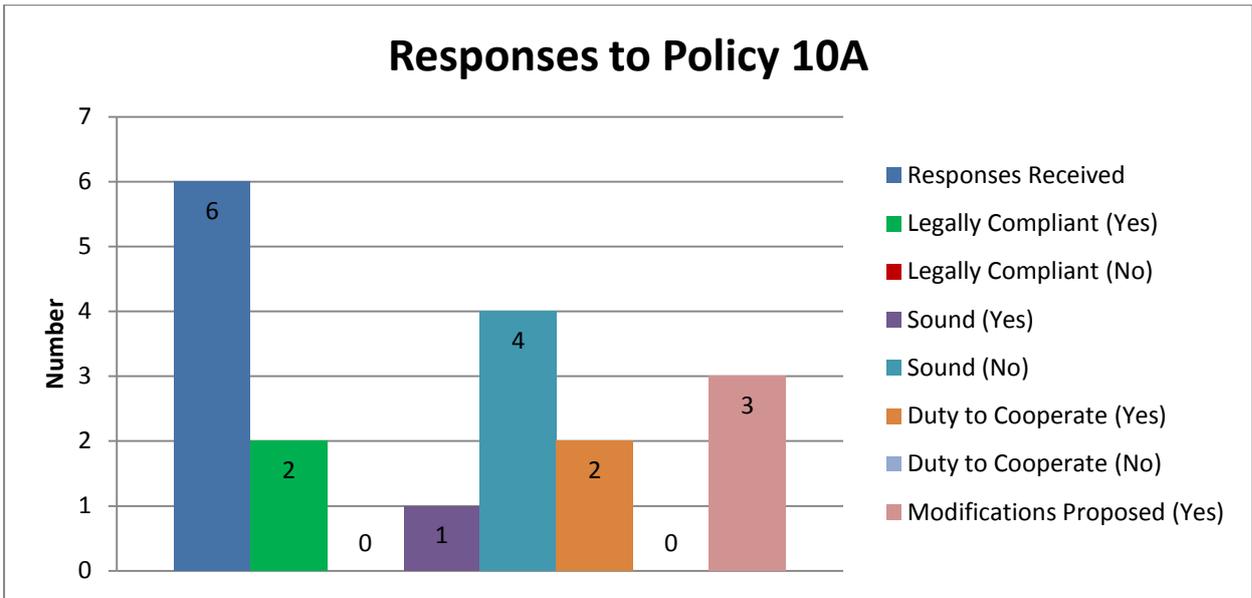
- Policy 9 Health and Wellbeing



Chapter 10 – A Good Place to do Business

The policies contained within Chapter 10 are:

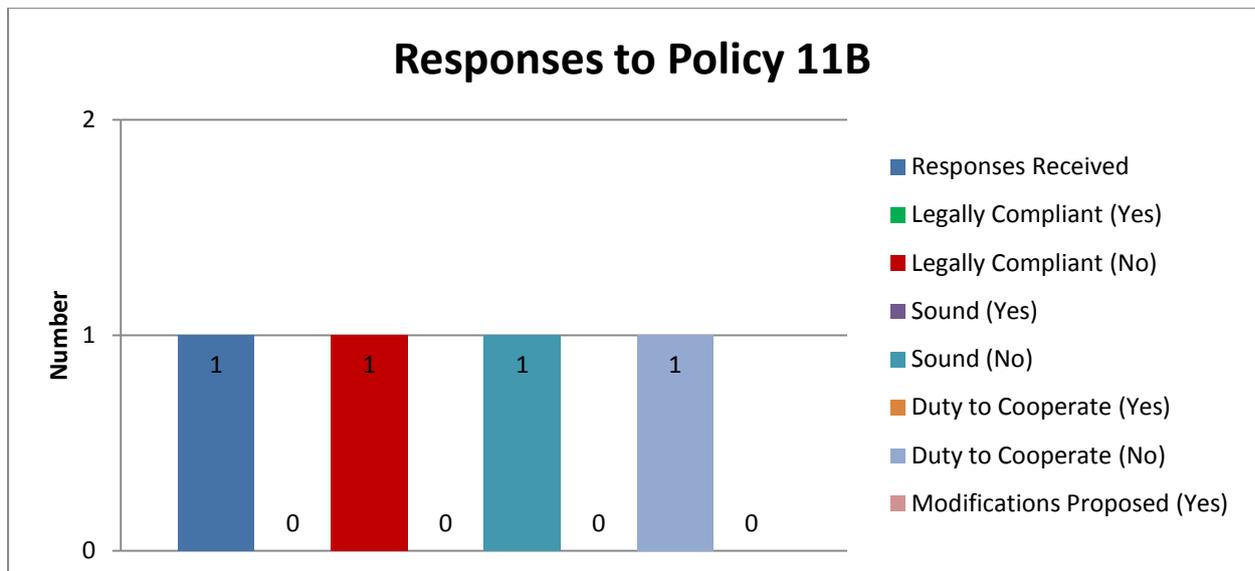
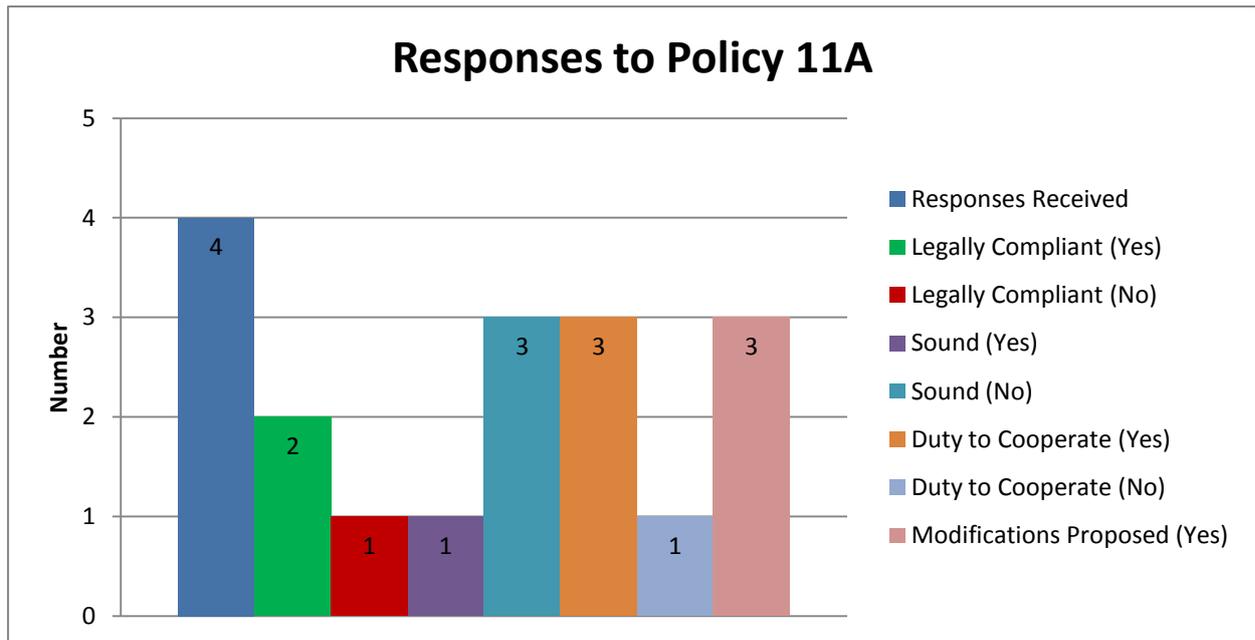
- Policy 10A - A Diverse Local Economy
- Policy 10B - Town Centre Development
- Policy 10C - Sustainable Tourism

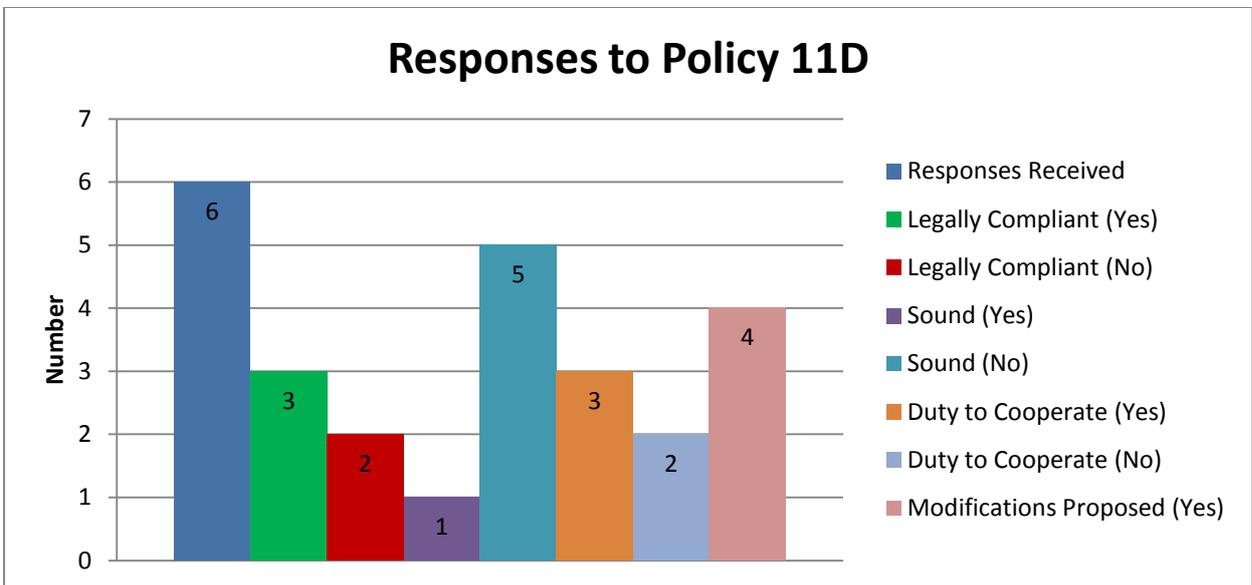
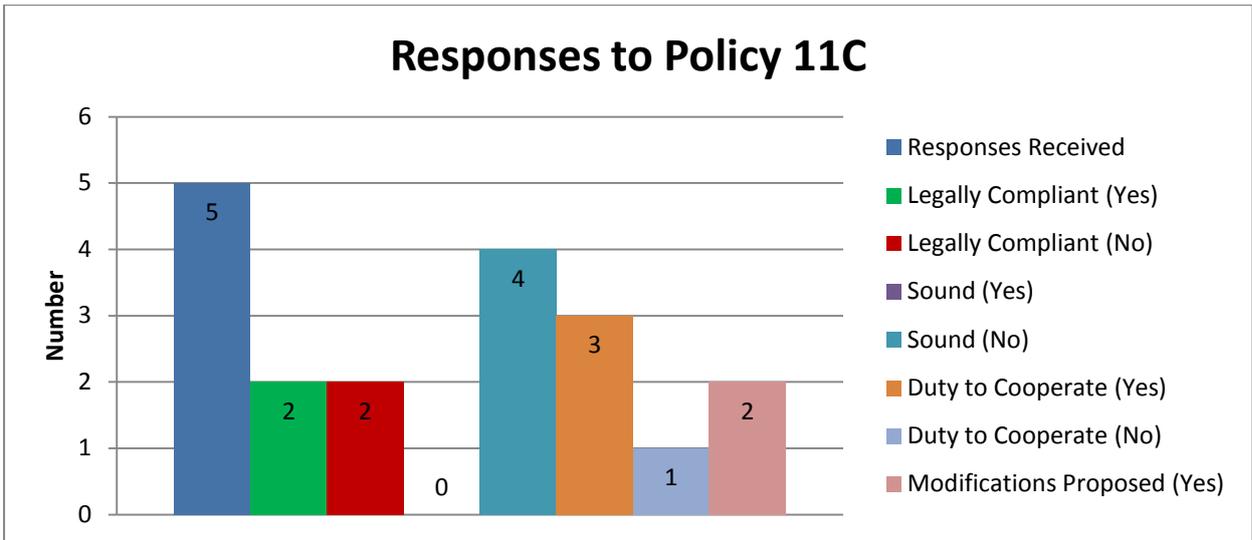


Chapter 11 – A Unique Place

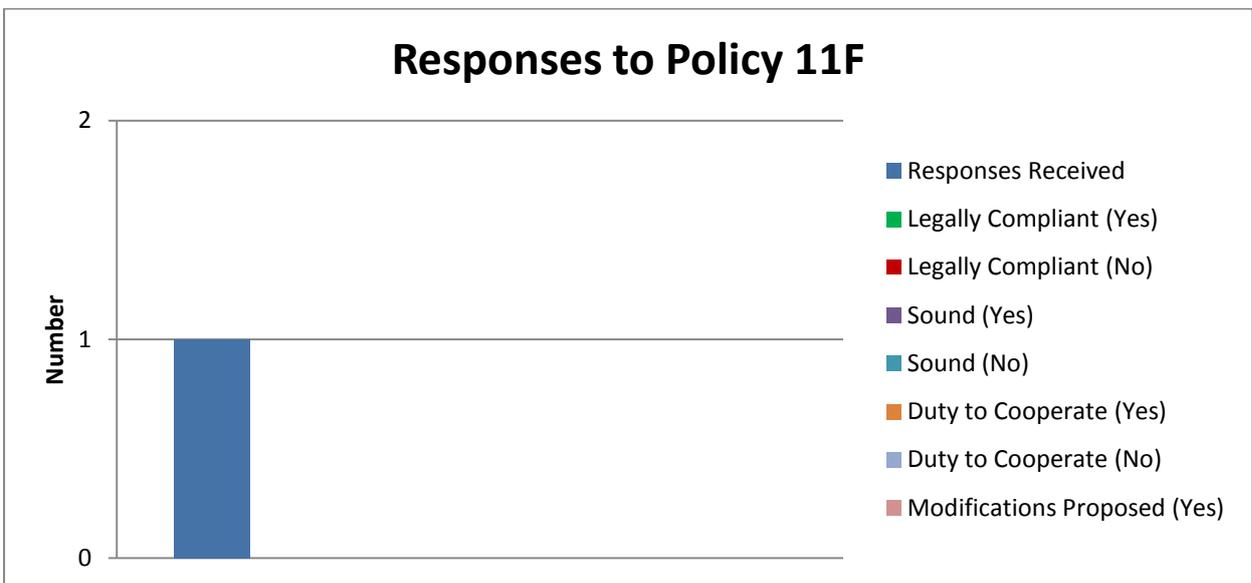
The policies contained within Chapter 11 are:

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





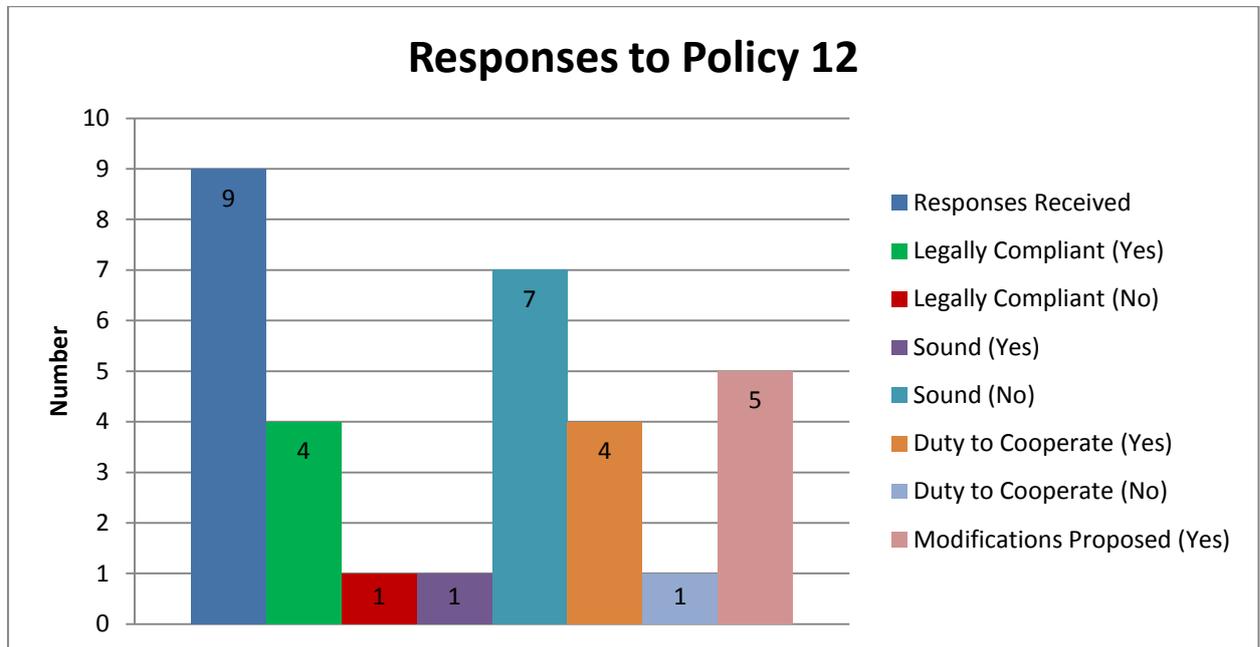
There were no responses to Policy 11E.



Chapter 12 – Strategic Infrastructure

The policies contained within Chapter 12 are:

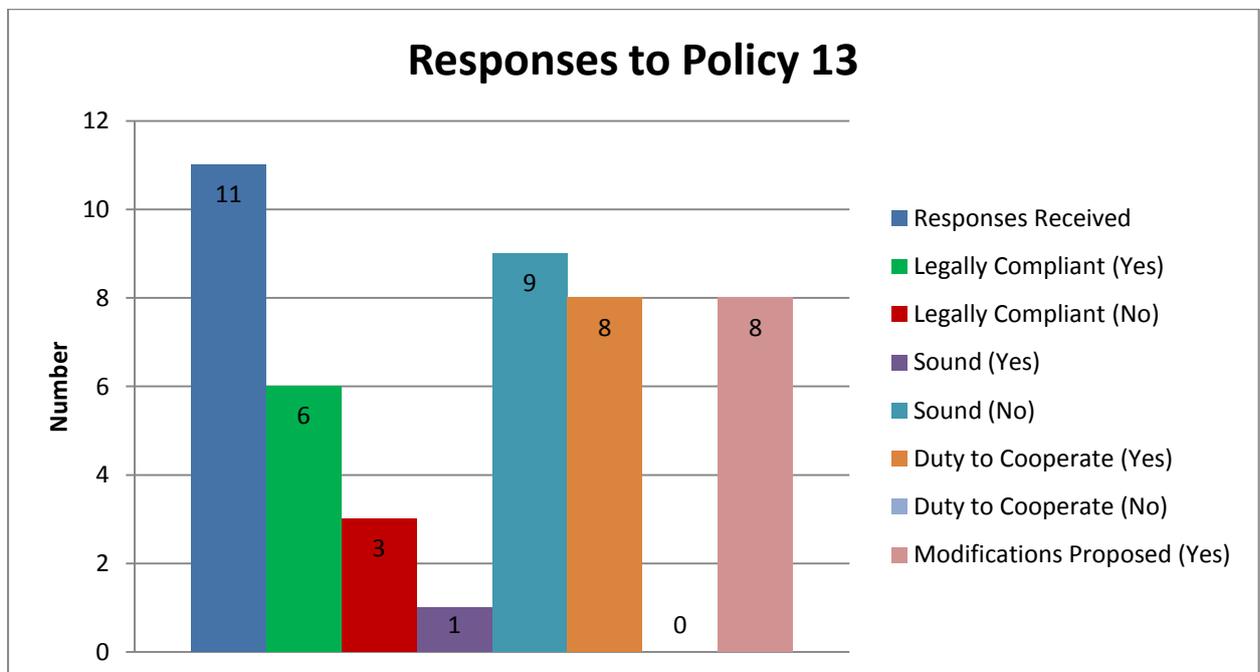
- Policy 12 - Strategic Infrastructure



Chapter 13 – Transport and Accessibility

The policies contained within Chapter 13 are:

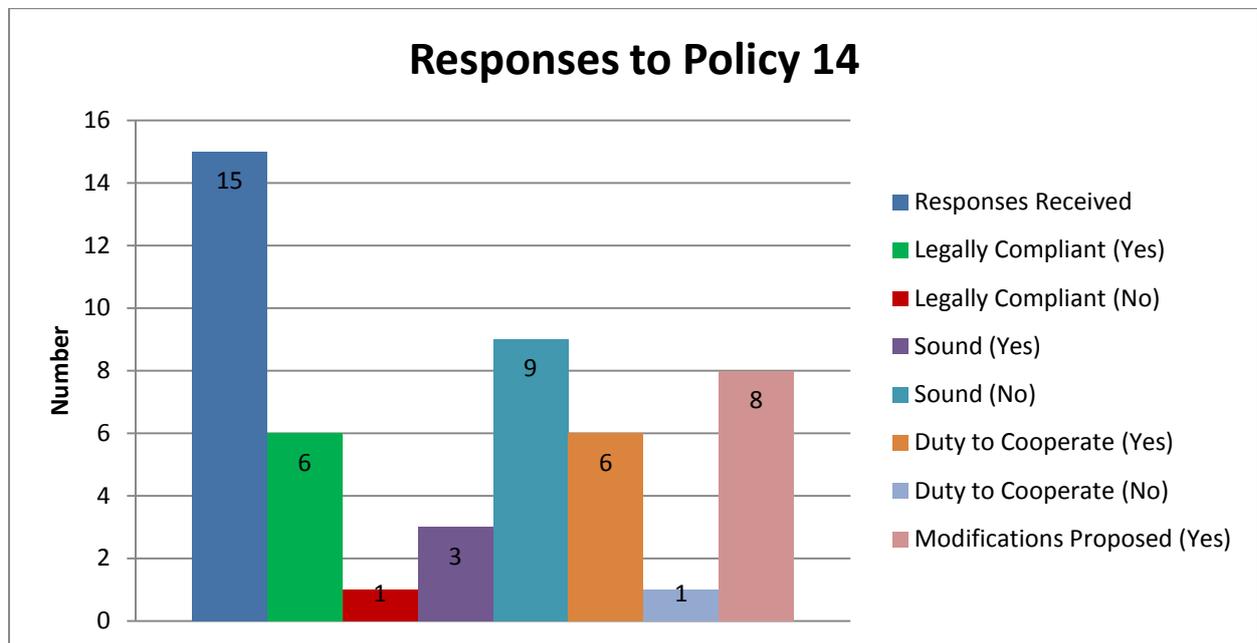
- Policy 13 - Transport and Accessibility in Wyre Forest



Chapter 14 – Strategic Green Infrastructure

The policies contained within Chapter 14 are:

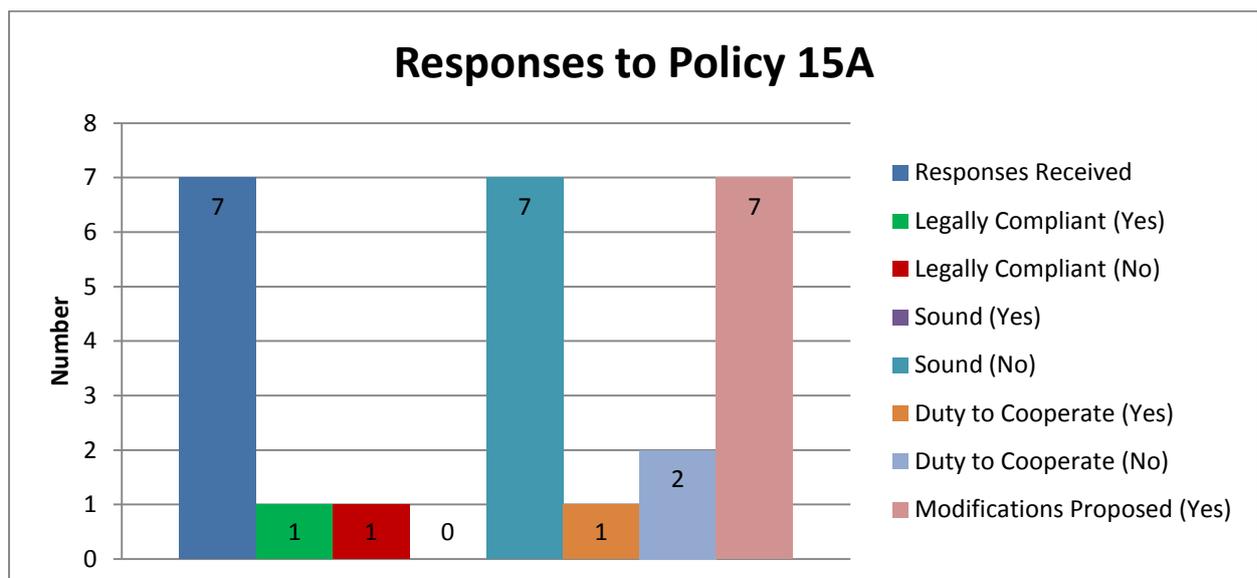
- Policy 14 - Strategic Green Infrastructure

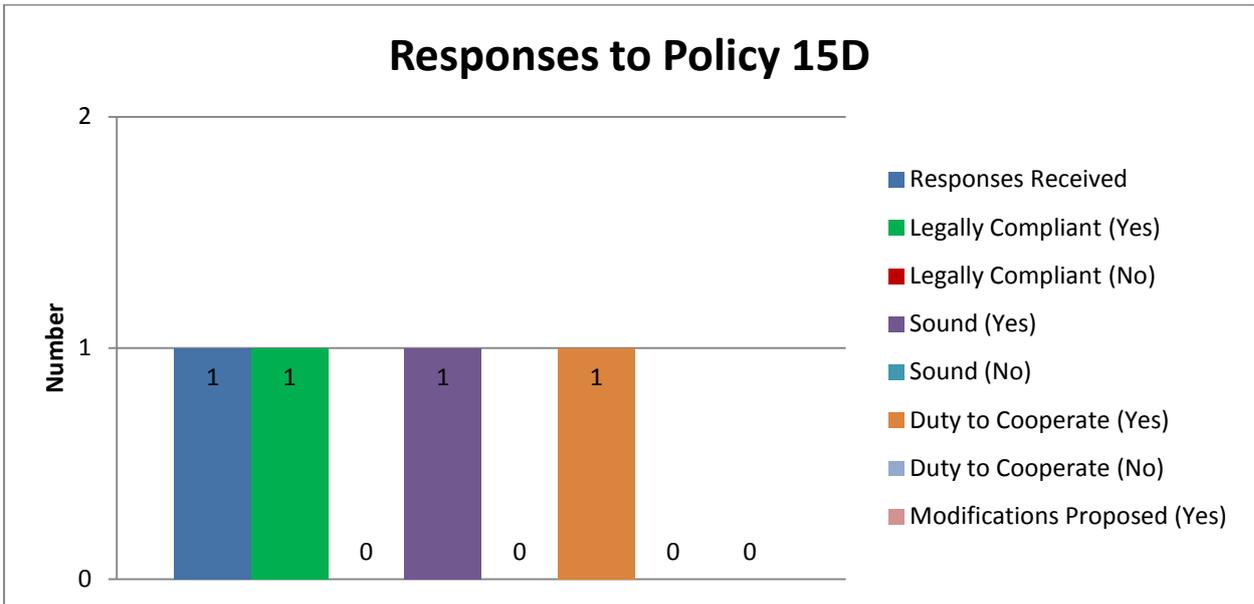
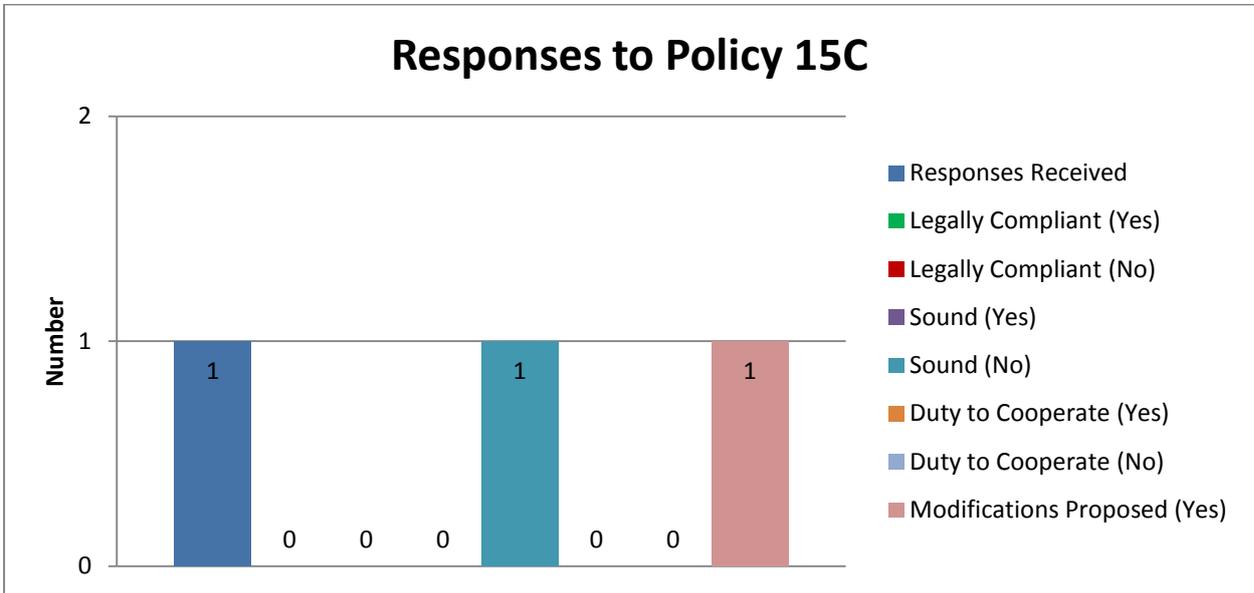
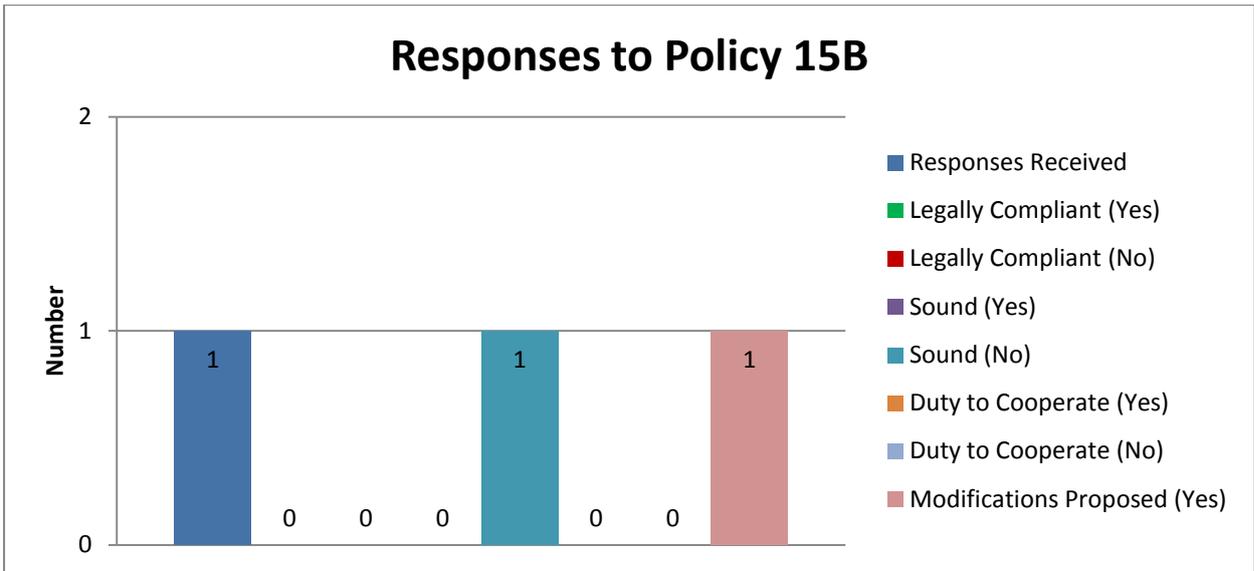


Chapter 15 – Water Management

The policies contained within Chapter 15 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)

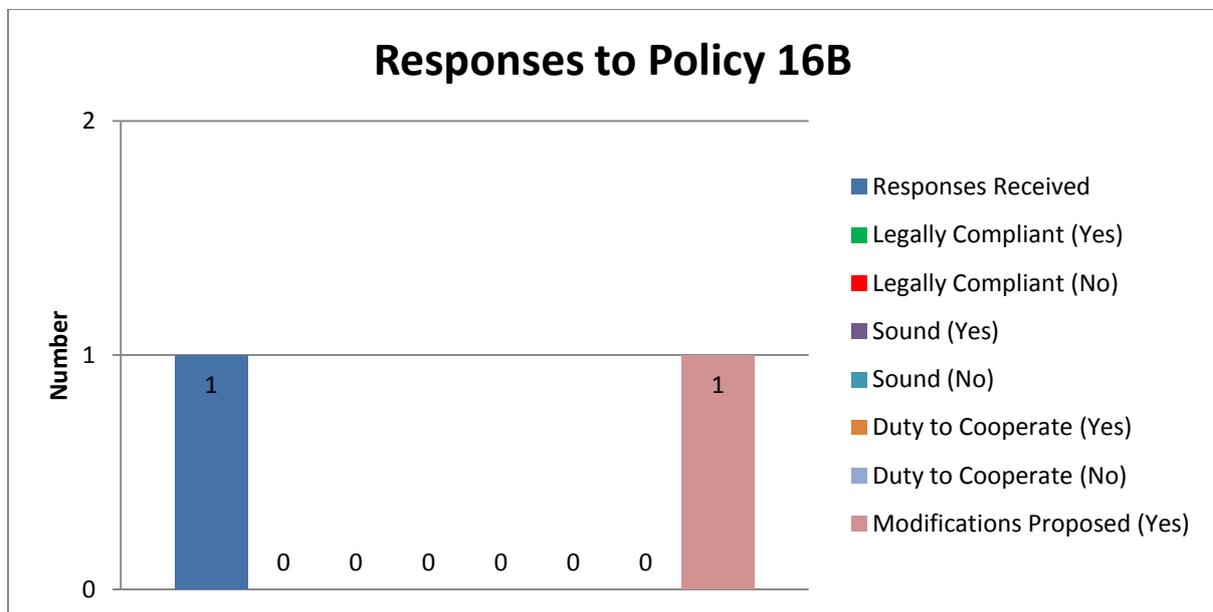
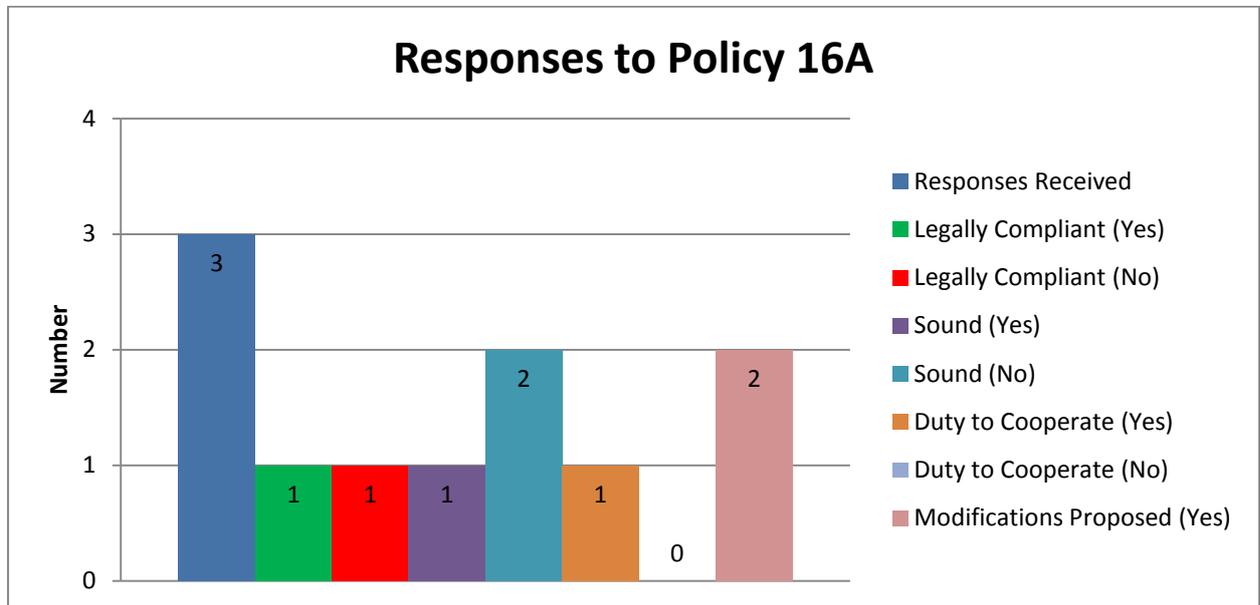


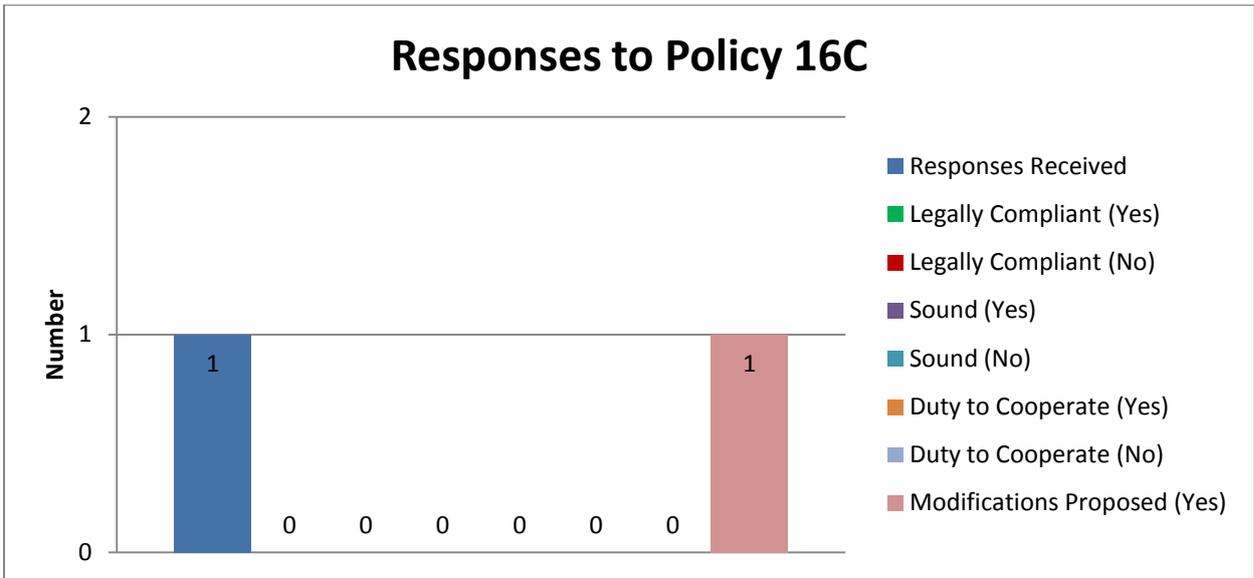


Chapter 16 – Pollution, Minerals and Waste

The policies contained within Chapter 16 are:

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





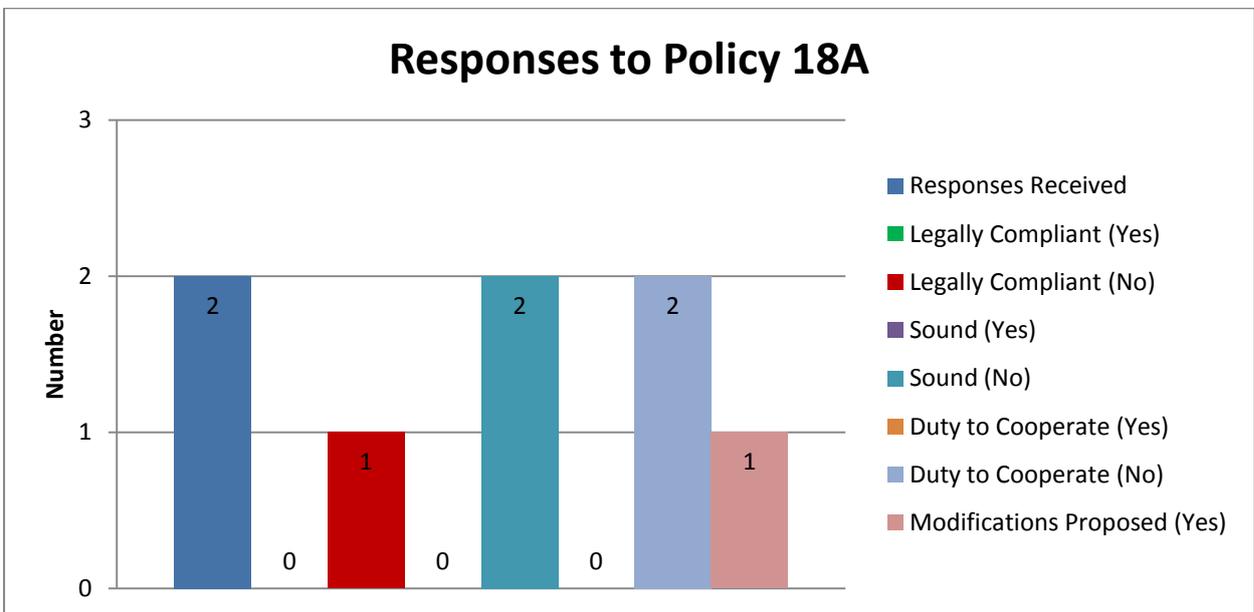
Chapter 17 – Development Management Introduction

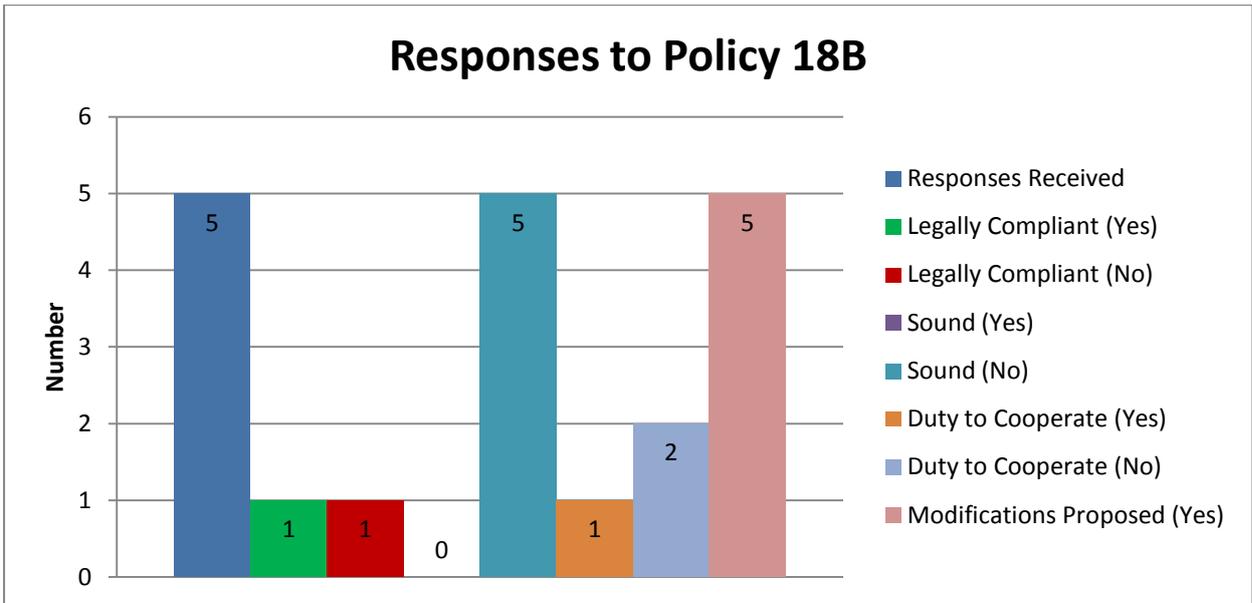
There are no policies in Chapter 17.

Chapter 18 – A Desirable Place to Live

The policies contained within Chapter 18 are:

- Policy 18A - Financial Viability
- Policy 18B - Residential Infill Development
- Policy 18C - Flat Conversions
- Policy 18D - Residential Caravans and Mobile Homes



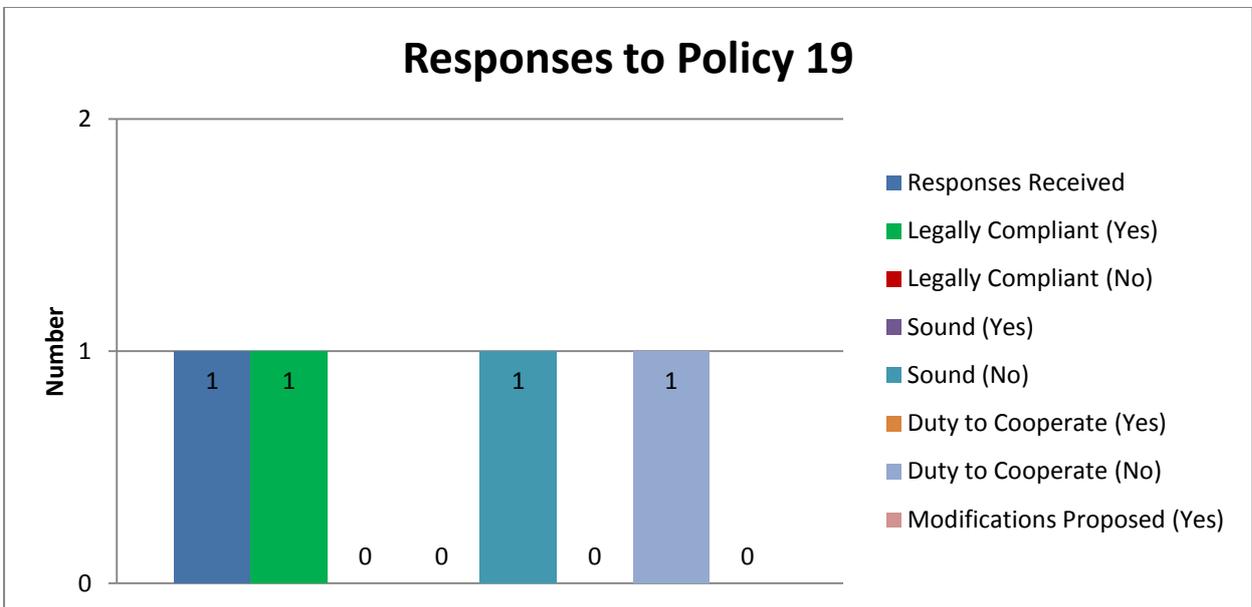


There were no responses to policies Policy 18C - Flat Conversions and 18D - Residential Caravans and Mobile Homes.

Chapter 19 – Providing Accommodation for Gypsies, Travellers and Travelling Showpeople

The policies contained within Chapter 19 are:

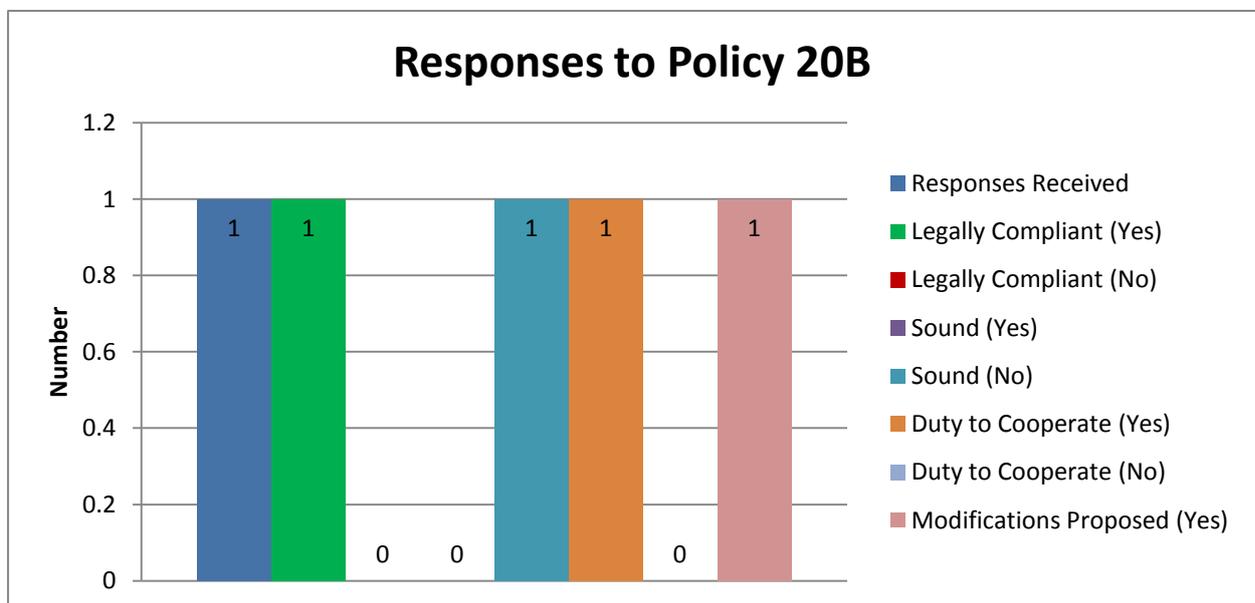
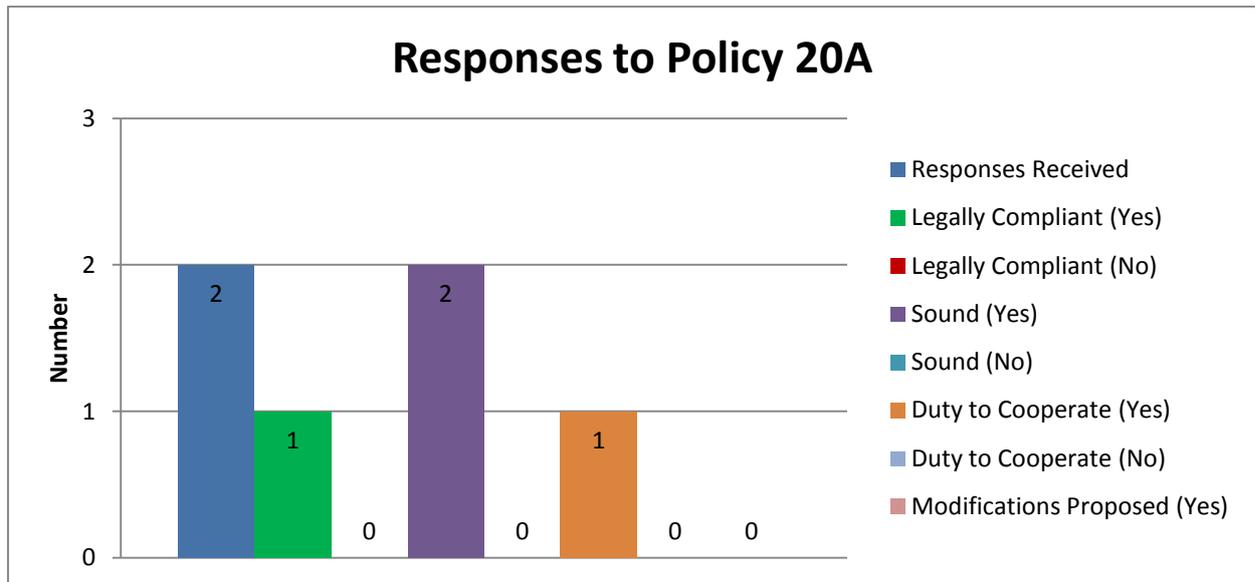
- Policy 19 - Site Standards for Gypsies, Travellers and Travelling Showpeople

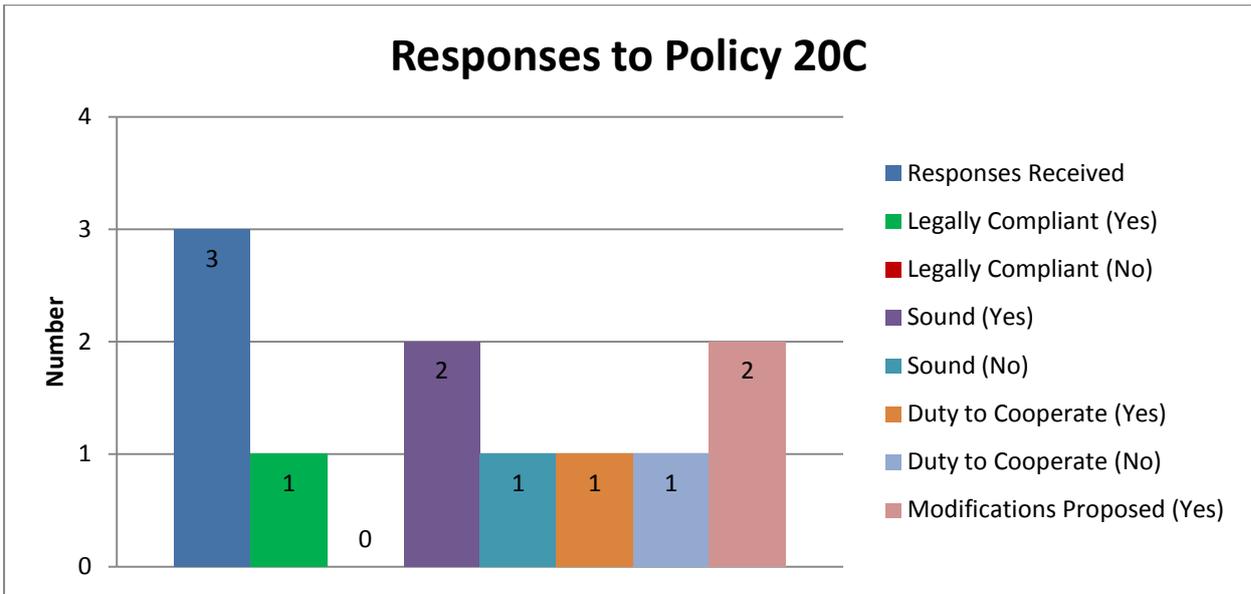


Chapter 20 – Community Facilities

The policies contained within Chapter 20 are:

- Policy 20A - Community Facilities
- Policy 20B - Open Space
- Policy 20C - Provision for Open Space, Sports Pitches and Outdoor Community Uses in Housing Development

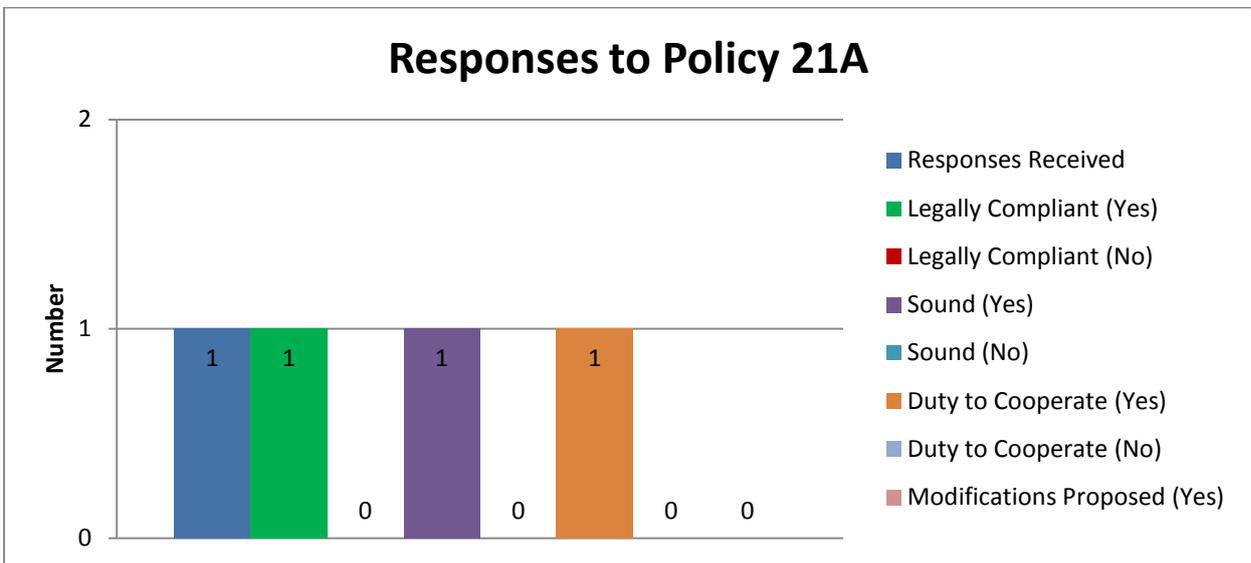




Chapter 21 – Employment Land

The policies contained within Chapter 21 are:

- Policy 21A - Economic Development
- Policy 21B - Rural Employment
- Policy 21C - Live Work Units
- Policy 21D – Offices



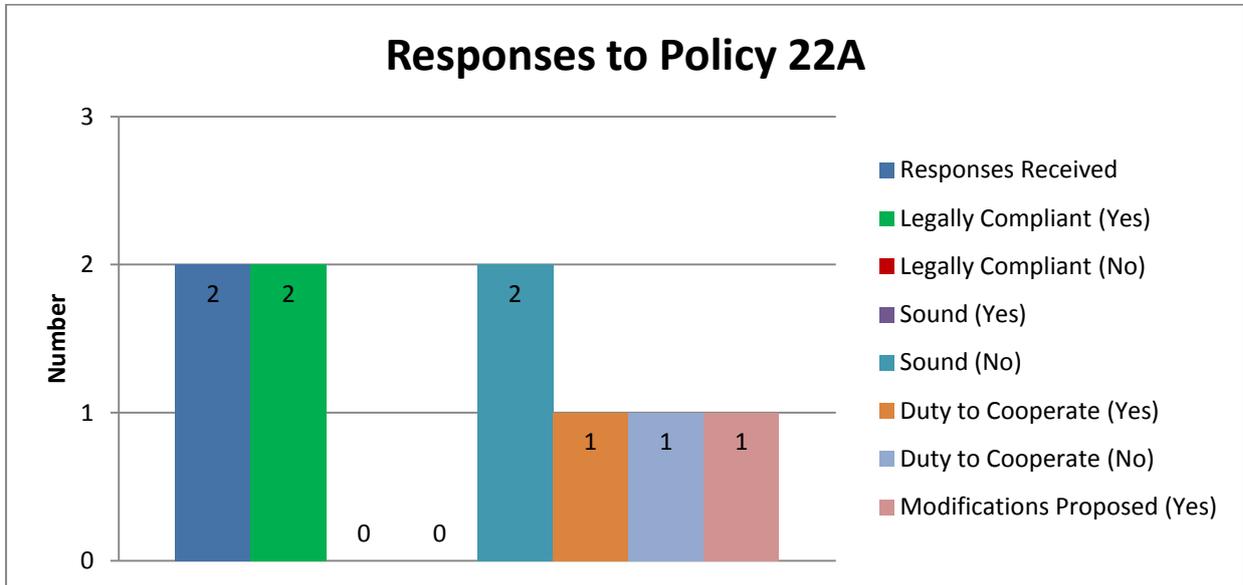
No responses were received for Policy 21B - Rural Employment, Policy 21C - Live Work Units and Policy 21D – Offices.

Chapter 22 – Town Centre Development and Retail

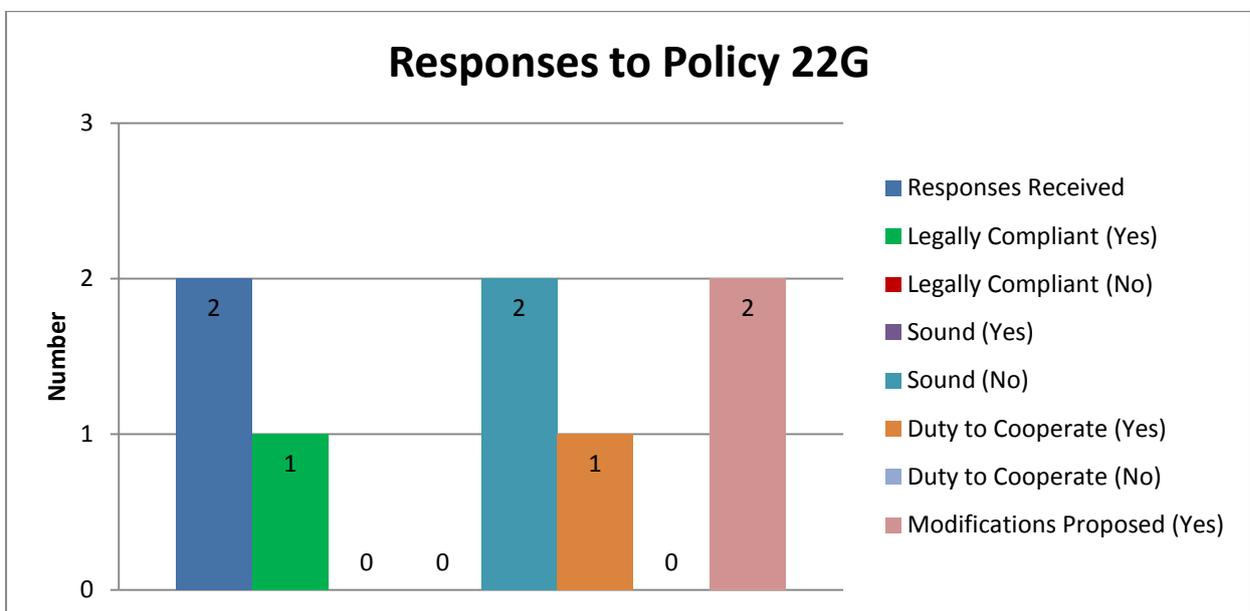
The policies contained within Chapter 22 are:

- Policy 22A - Town Centre development
- Policy 22B - Edge of Centre and Out of Town development

- Policy 22C - Change of use from retail to alternative uses in local centres
- Policy 22D - Local Shops
- Policy 22E - Specialist Retailing
- Policy 22F - Food and Drink Retailing
- Policy 22G Hot Food Takeaways



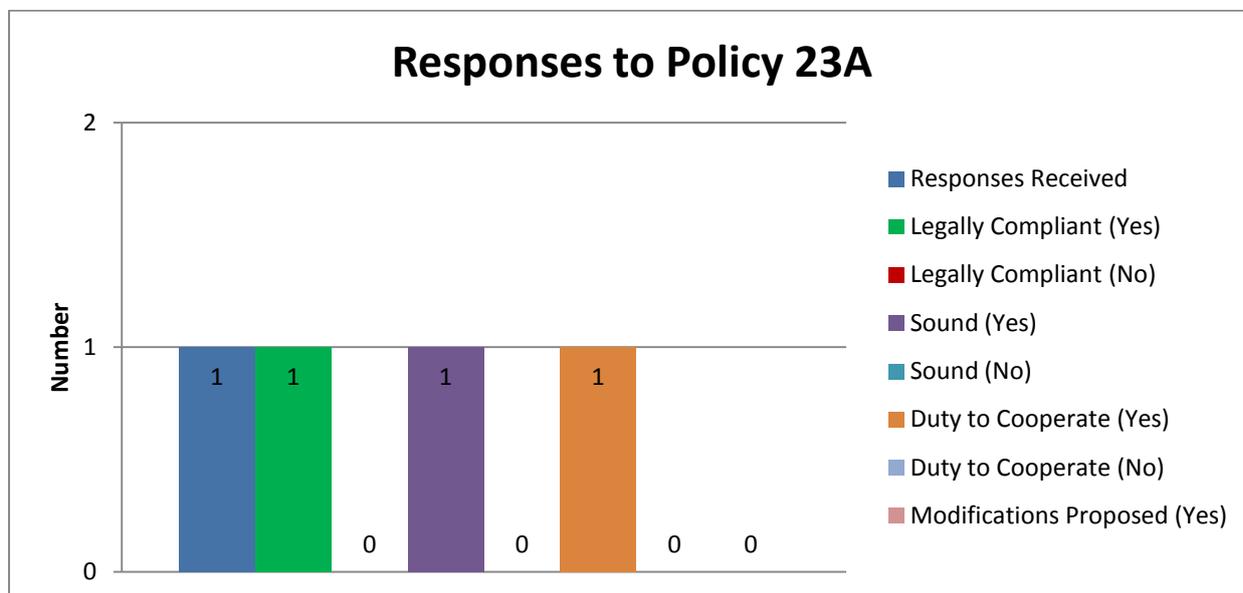
No responses were received for Policy 22B - Edge of Centre and Out of Town Development, Policy 22C - Change of use from retail to alternative uses in local centres, Policy 22D - Local Shops, Policy 22E - Specialist Retailing and Policy 22F - Food and Drink Retailing.



Chapter 23 – Sustainable Tourism

The policies contained within Chapter 23 are:

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

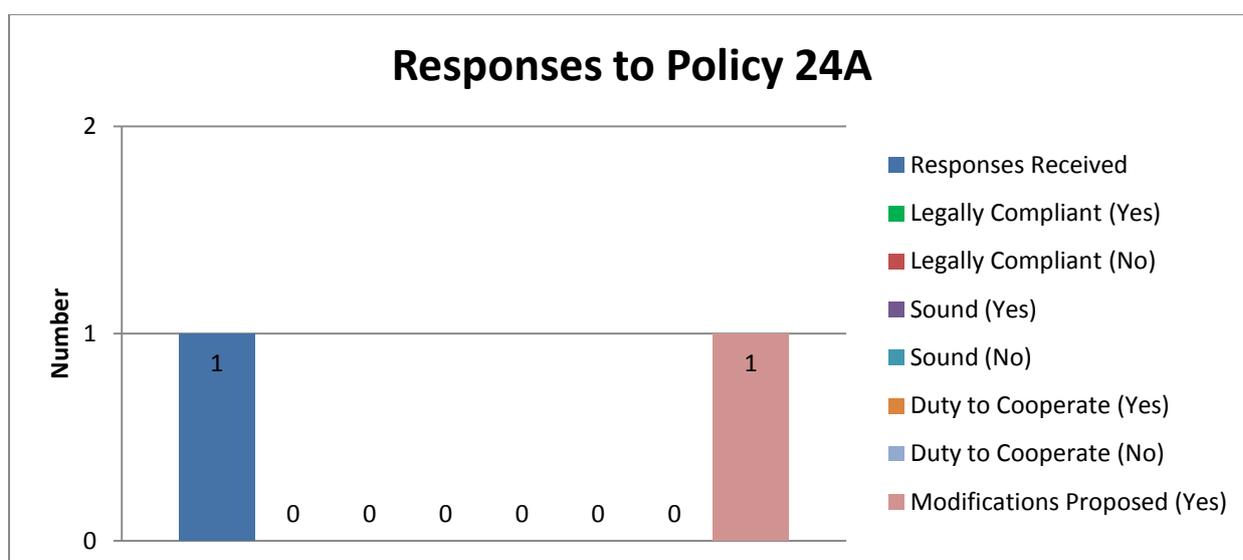


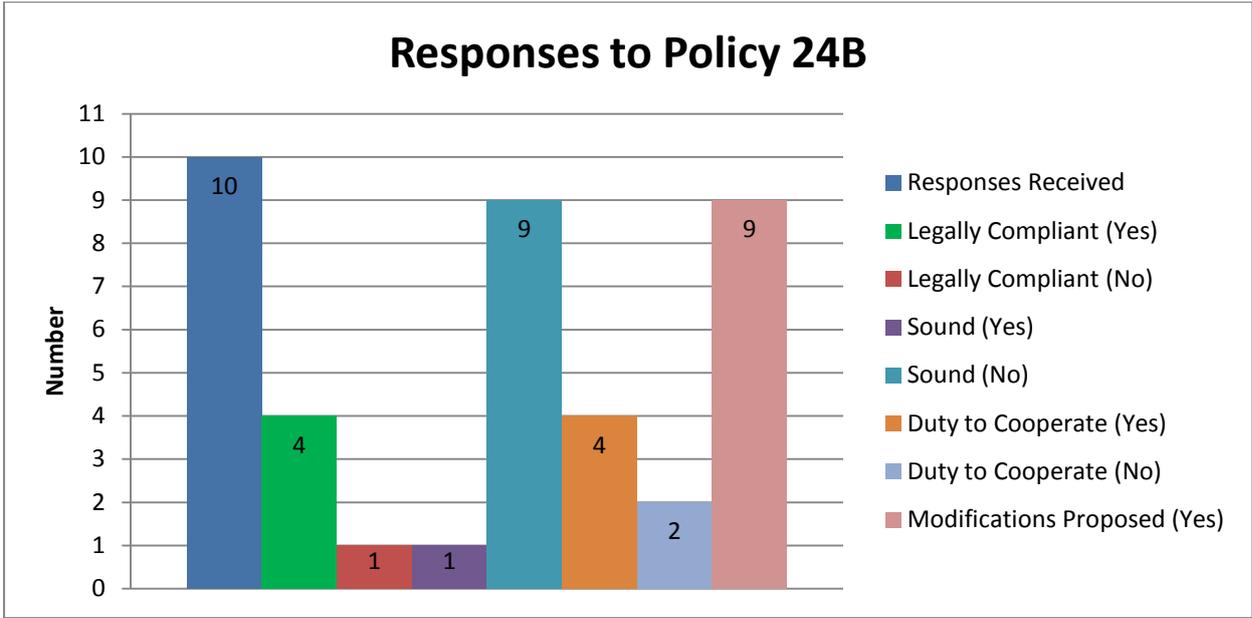
There were no responses for Policy 23B - Supporting Tourist Attractions or Policy 23C - Tourist Accommodation.

Chapter 24 – Telecommunications and Renewable Energy

The policies contained within Chapter 24 are:

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

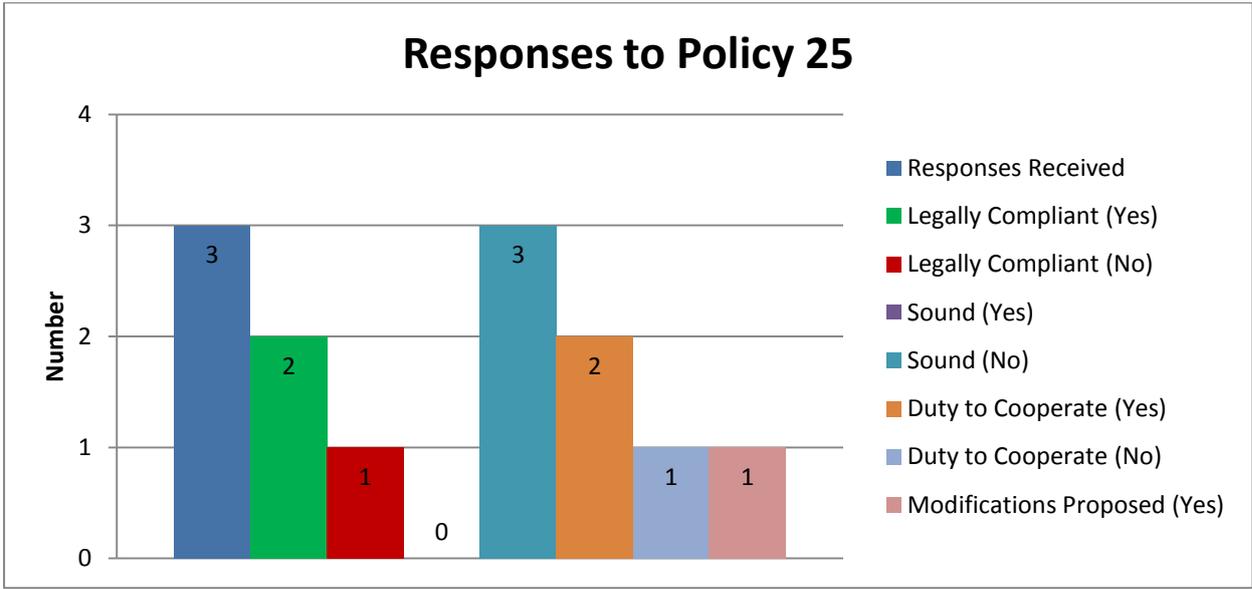




Chapter 25 – Safeguarding the Green Belt

The policies contained within Chapter 25 are:

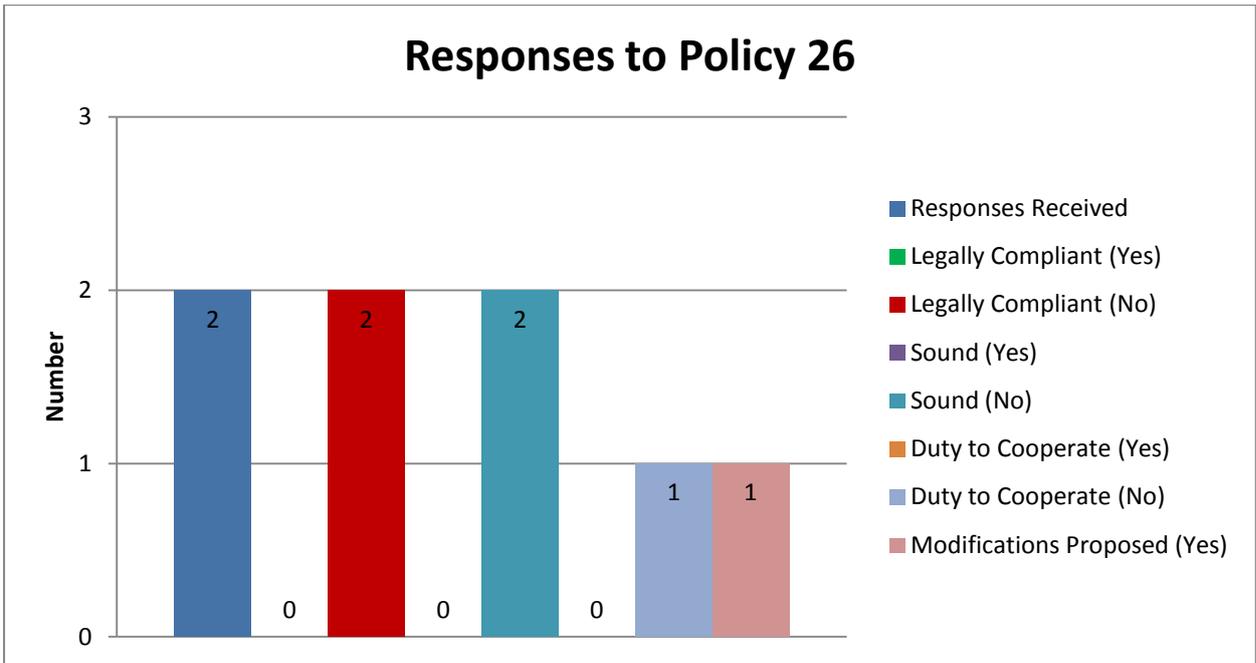
- Policy 25 - Safeguarding the Green Belt



Chapter 26 – Safeguarding the Historic Environment

The policies contained within Chapter 26 are:

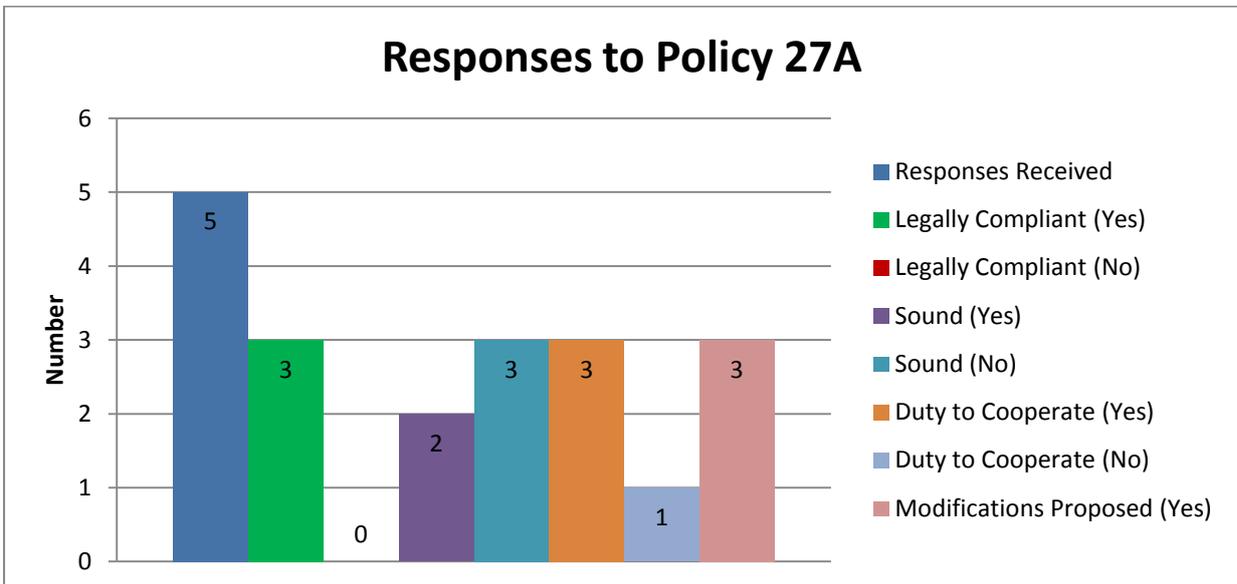
- Policy 26 - Safeguarding the Historic Environment



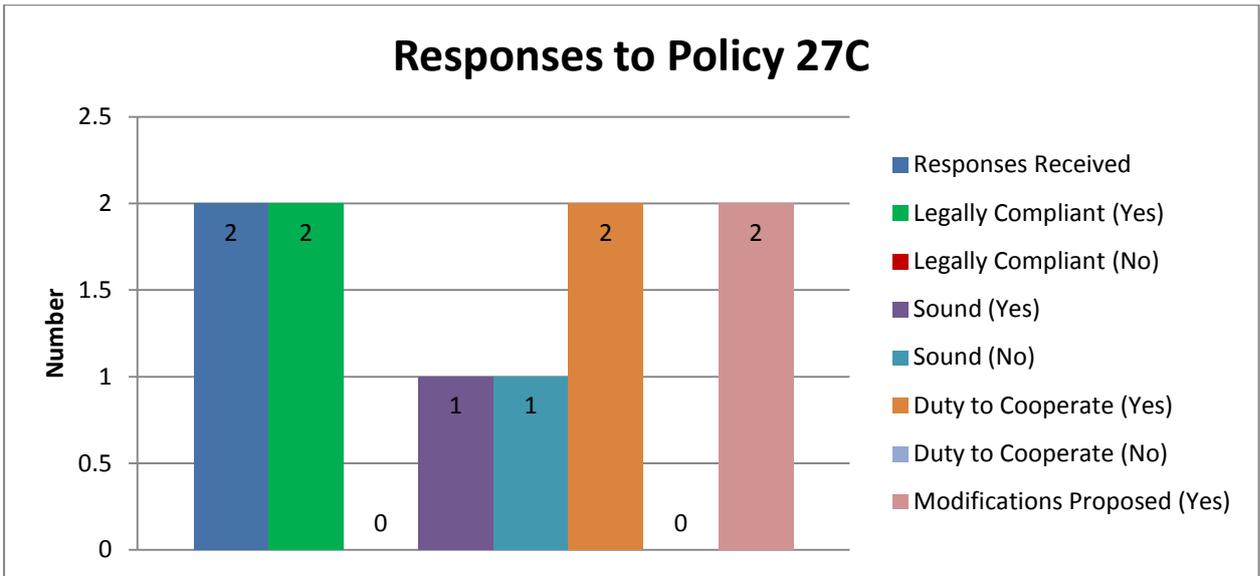
Chapter 27 – Quality Design and Local Distinctiveness

The policies contained within Chapter 27 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



There were no responses for Policy 27B - Design of Extensions and Alterations.

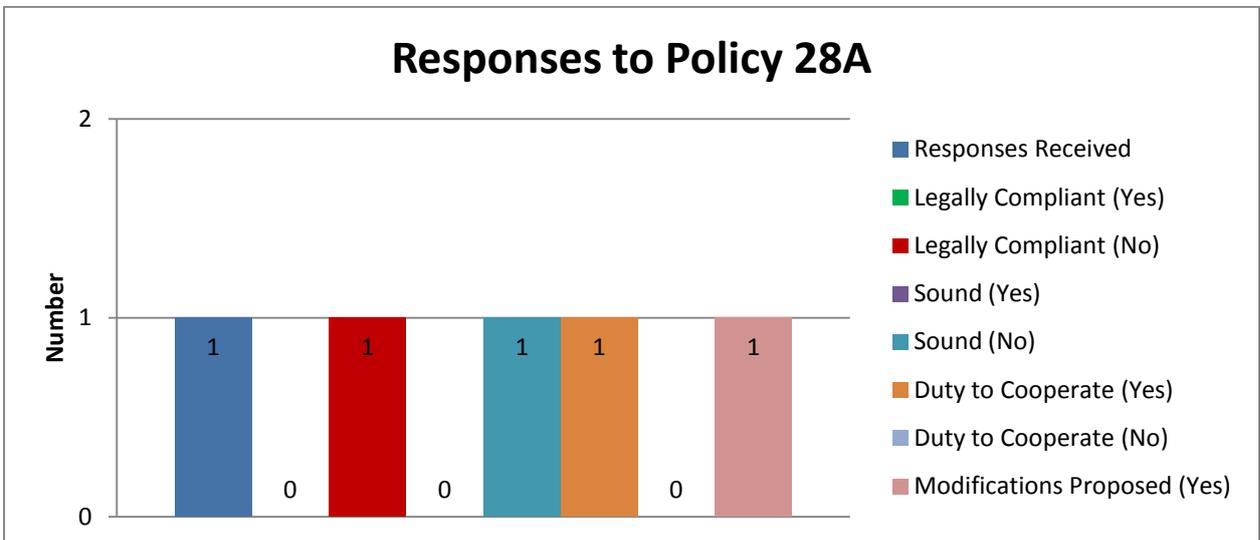


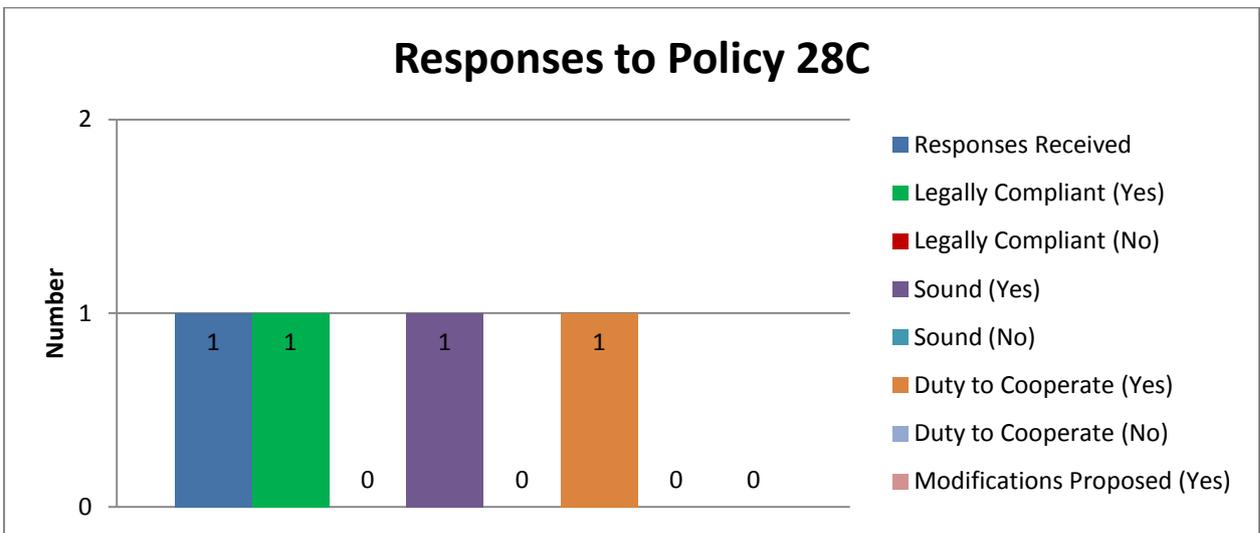
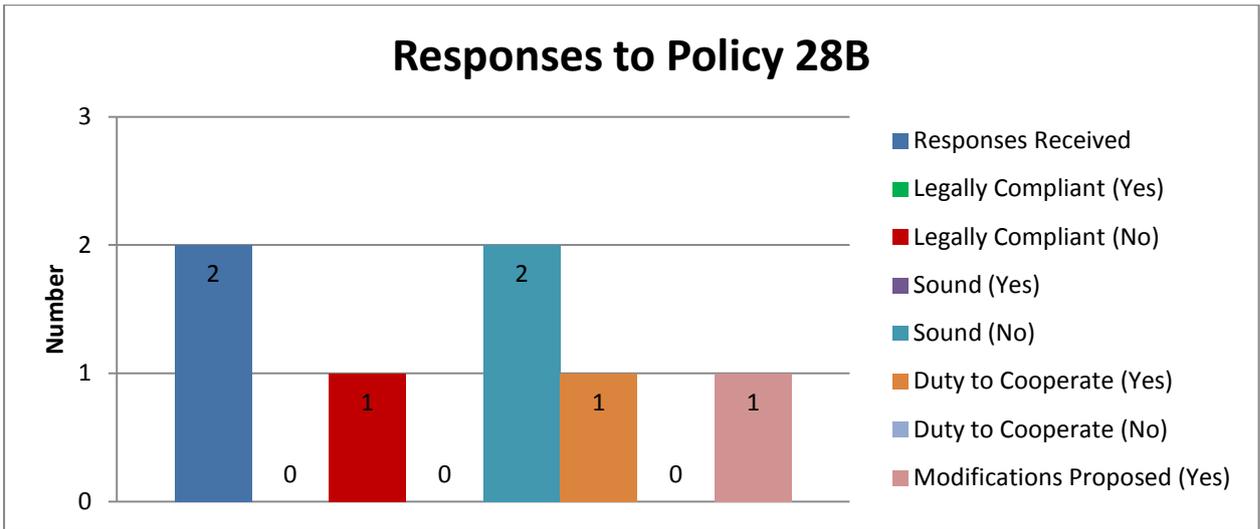
There were no responses for Policy 27D – Advertisements and Policy 27E - Wyre Forest Waterways.

Chapter 28 – Rural development

The policies contained within Chapter 28 are:

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





Chapter 29 – Site Allocations Introduction

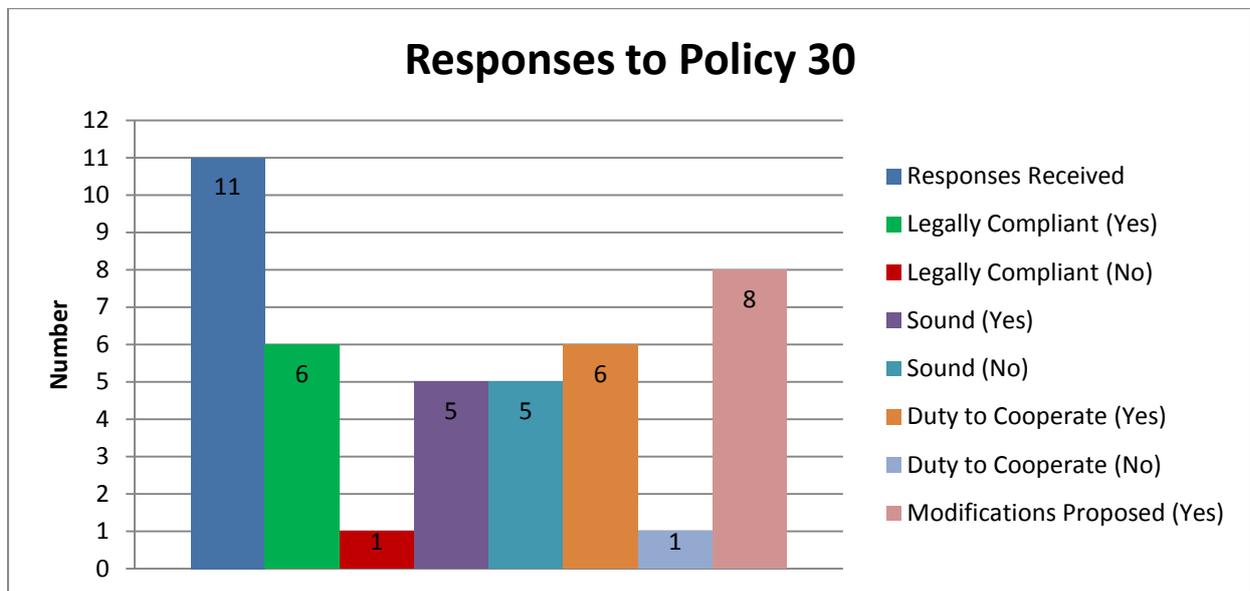
There are no policies in Chapter 29

Chapter 30 – Kidderminster Town

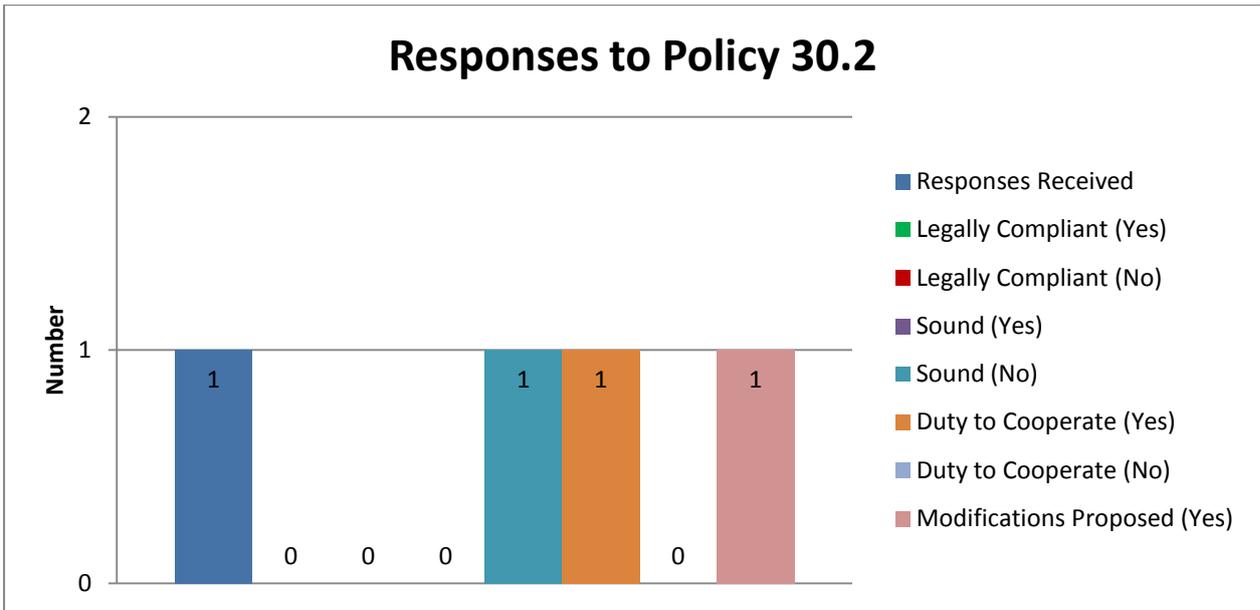
The policies contained within Chapter 30 are:

- Policy 30 Kidderminster Town
- Policy 30.1 Chester Road South Service Station AS/3
- Policy 30.2 Former Victoria Sports Ground AS/5
- Policy 30.3 Lea Street School AS/6
- Policy 30.4 Land North of Bernie Crossland Walk AS/20
- Policy 30.5 Land at Bromsgrove Street (Lion Fields) BHS/2
- Policy 30.6 Timber Yard Park Lane BHS/16
- Policy 30.7 Kidderminster Fire Station BHS/38
- Policy 30.8 Boucher Building Green Street BHS/39
- Policy 30.9 Churchfields BW/1
- Policy 30.10 Limekiln Bridge BW/2

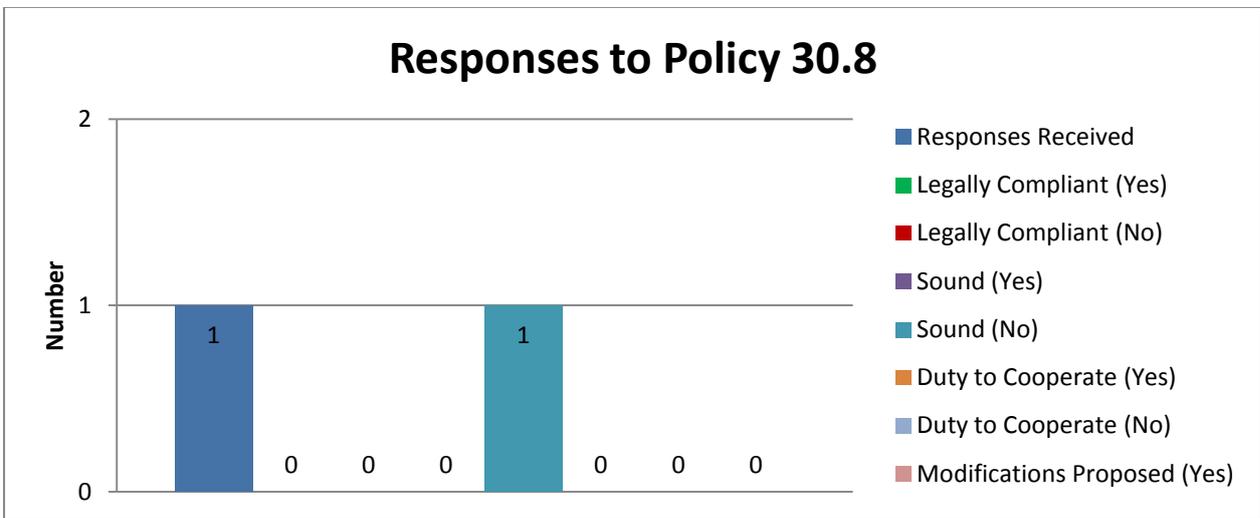
- Policy 30.11 Sladen School Site BW/3
- Policy 30.12 Land at Stourbridge Road BW/4 south
- Policy 30.13 BT Building Mill Street FHN/11
- Policy 30.14 Kidderminster Ambulance Station FPH/5
- Policy 30.15 Silverwoods FPH/10 & FPH/23
- Policy 30.16 Severn Grove Shops FPH/15
- Policy 30.17 Naylor’s Field FPH/18
- Policy 30.18 164/5 Sutton Park Road FPH/19
- Policy 30.19 Stourminster School Site OC/11
- Policy 30.20 Sion Hill School Site WFR/WC/18
- Policy 30.21 Land at Low Habberley WA/KF/3
- Policy 30.22 Land rear of Zortech Avenue LI/10
- Policy 30.23 Frank Stone building BHS/10
- Policy 30.24 - Rock Works BHS/17
- Policy 30.25 SDF site FPH/8
- Policy 30.26 Easter Park extension FPH/27
- Policy 30.27 Land at Hoobrook FPH/28
- Policy 30.28 VOSA FPH/29
- Policy 30.29 Former Burlish Golf Course Clubhouse LI/12



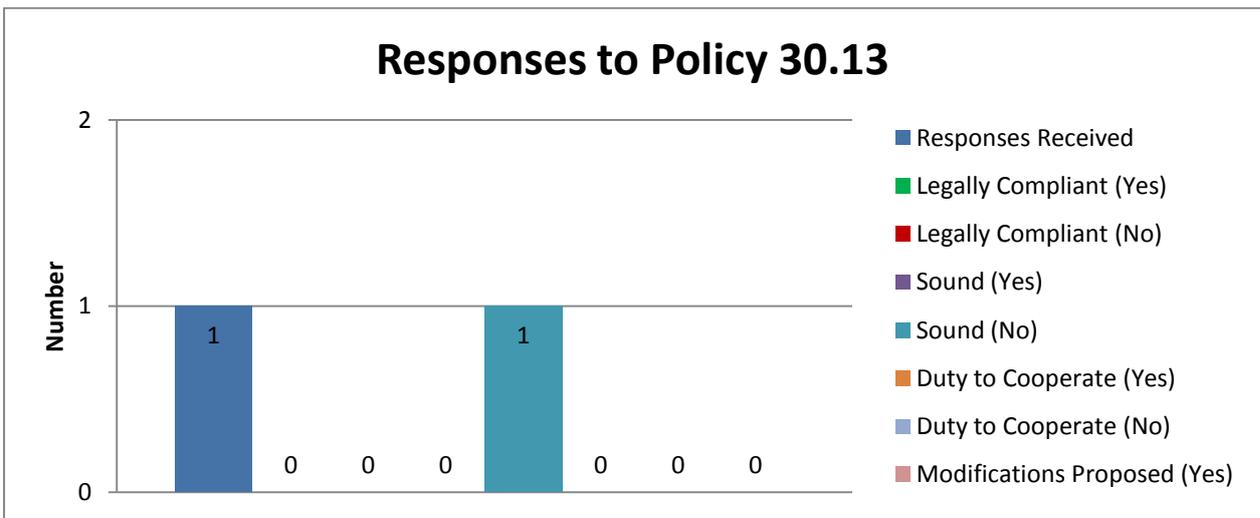
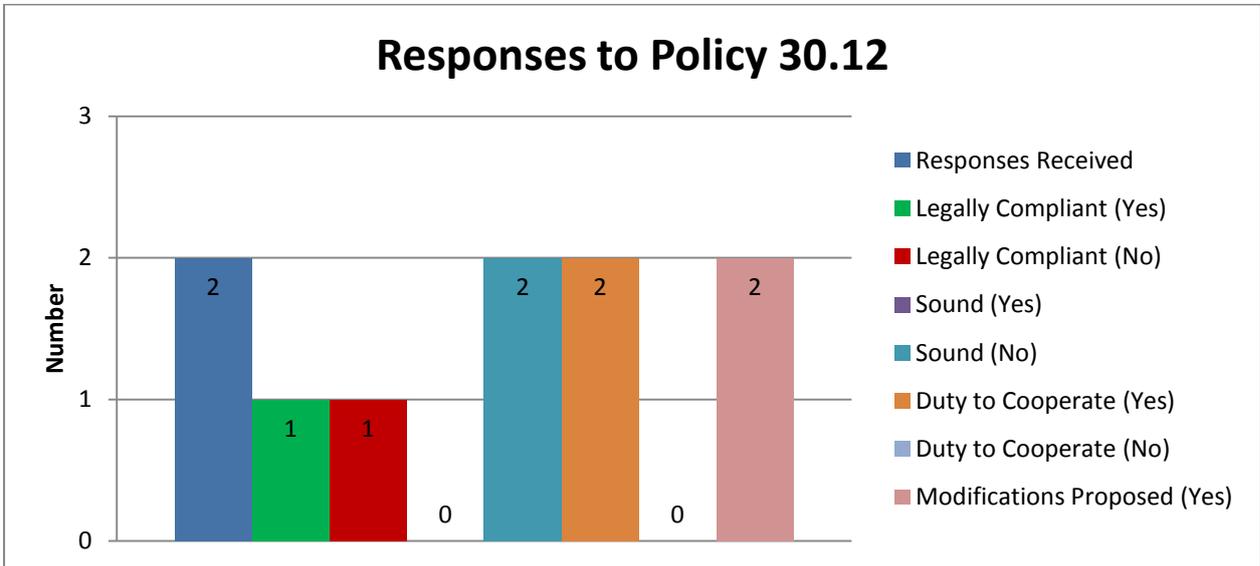
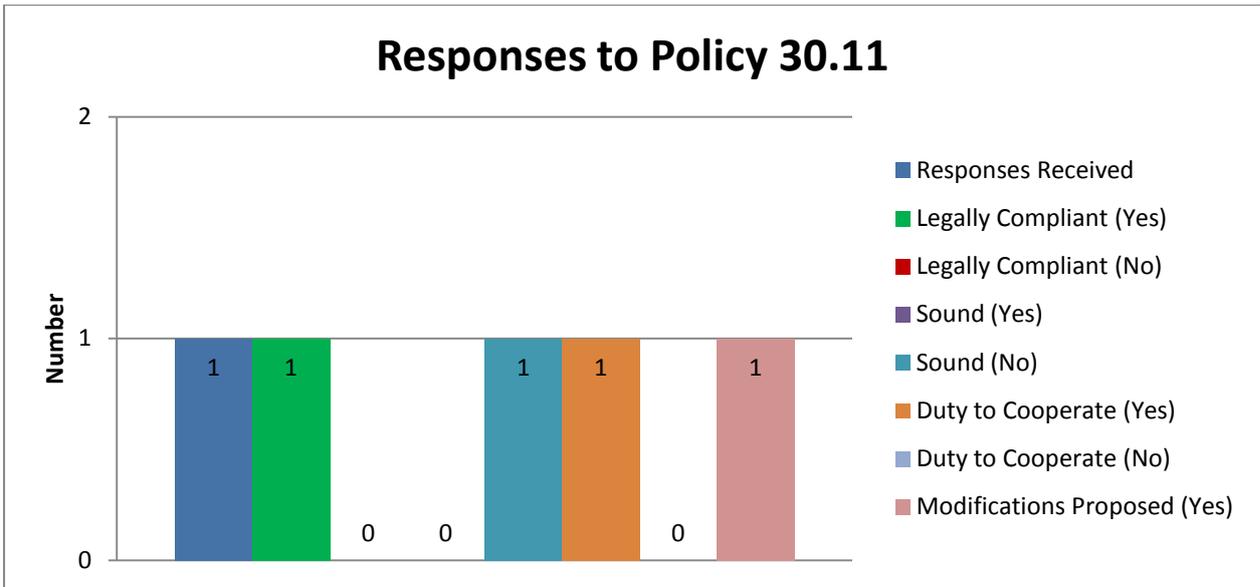
There were no responses to Policy 30.1 Chester Road South Service Station AS/3



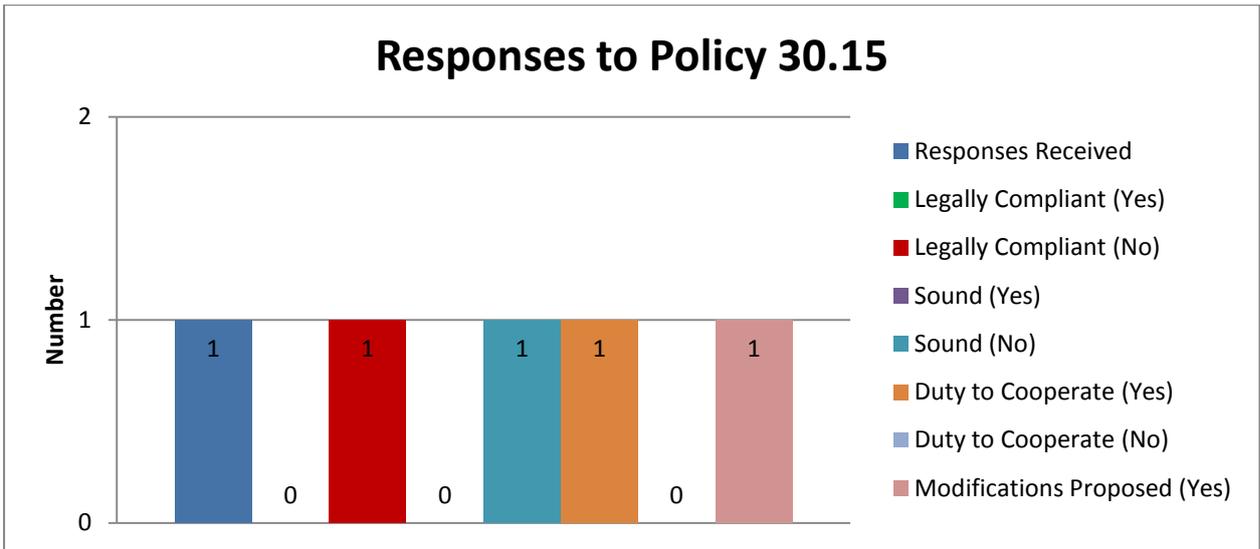
There were no responses to Policy 30.3 Lea Street School AS/6, Policy 30.4 Land North of Bernie Crossland Walk AS/20, Policy 30.5 Land at Bromsgrove Street (Lion Fields) BHS/2, Policy 30.6 Timber Yard Park Lane BHS/16 or Policy 30.7 Kidderminster Fire Station BHS/38.



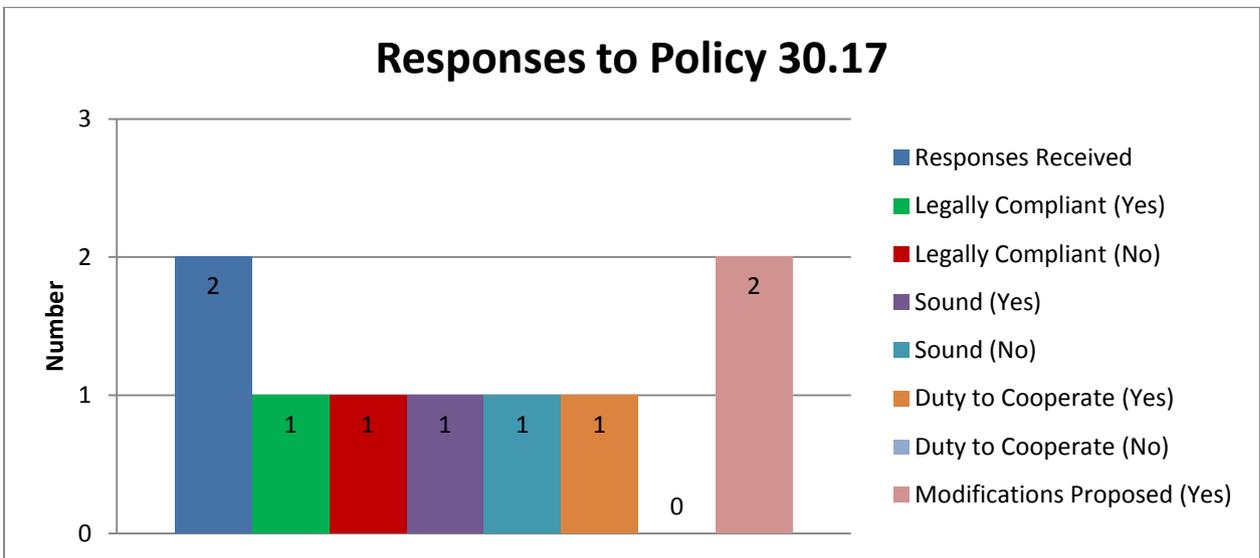
There were no responses to Policy 30.9 Churchfields BW/1 or Policy 30.10 Limekiln Bridge BW/2



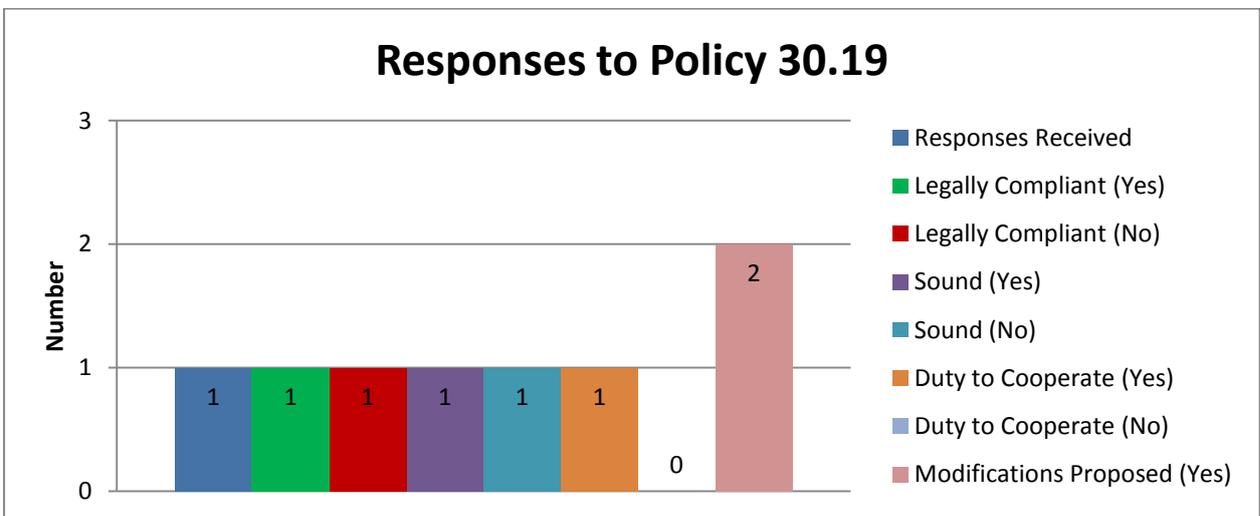
There were no responses to Policy 30.14 Kidderminster Ambulance Station FPH/5.



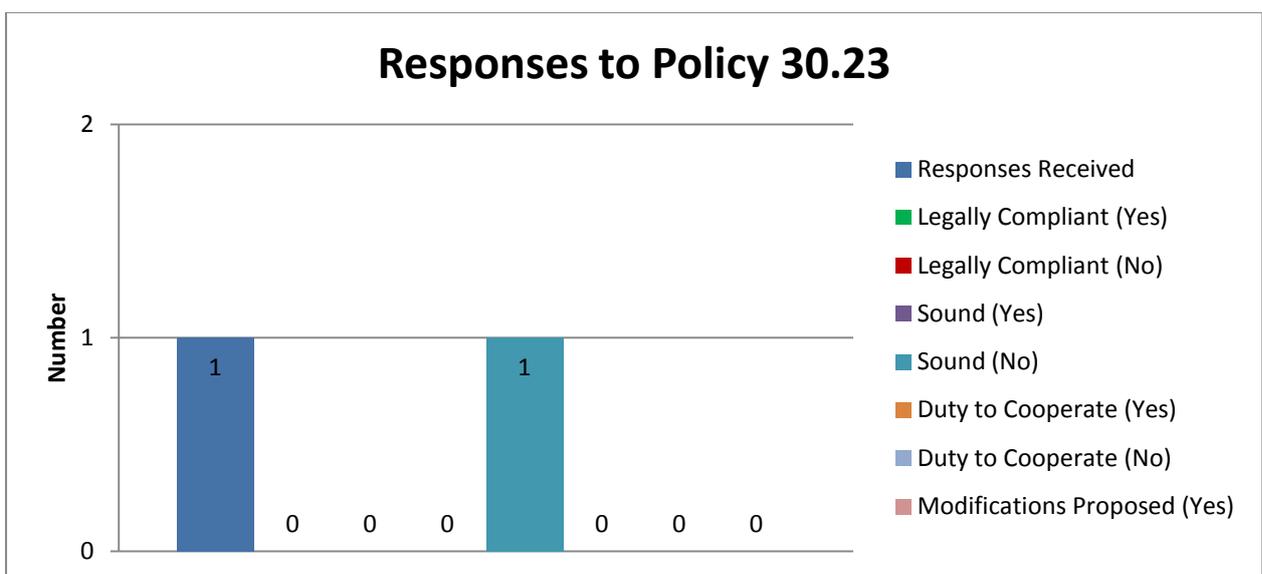
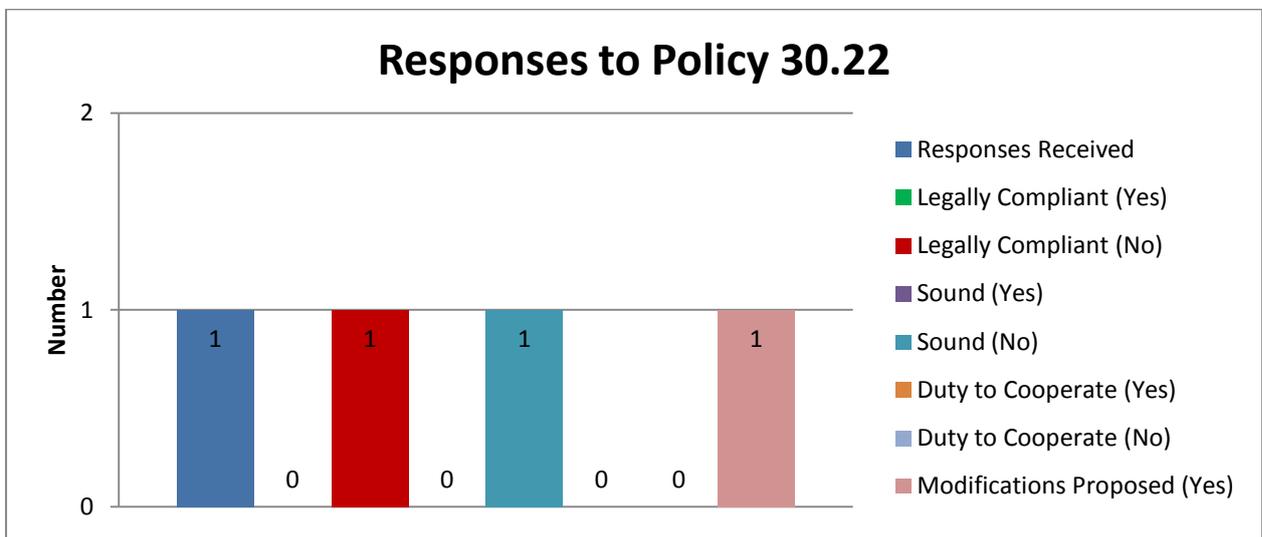
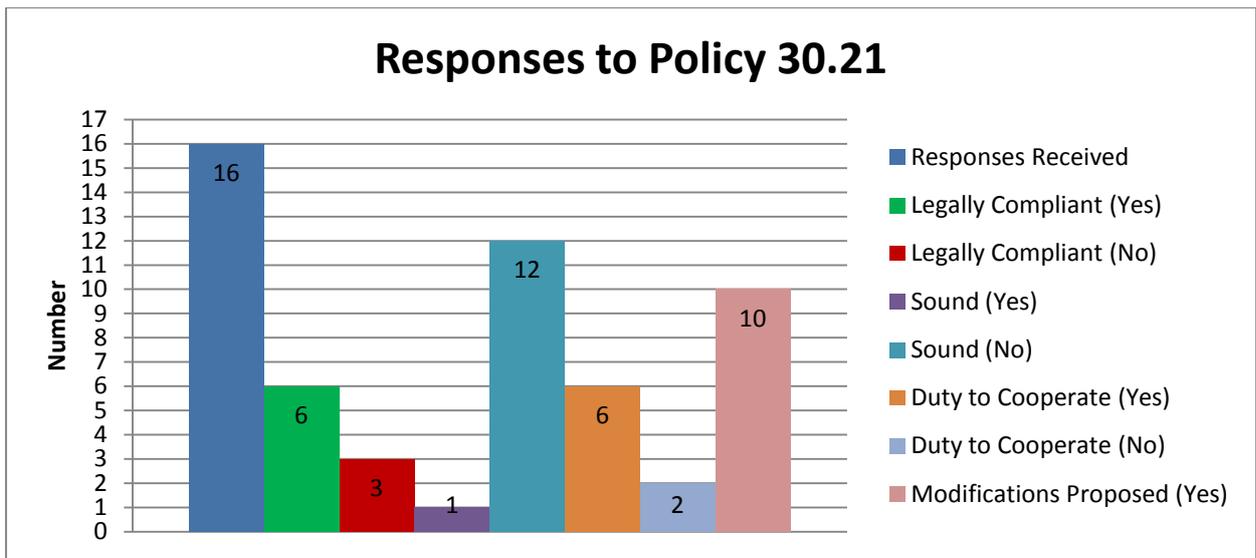
There were no responses to Policy 30.16 Severn Grove Shops FPH/15.

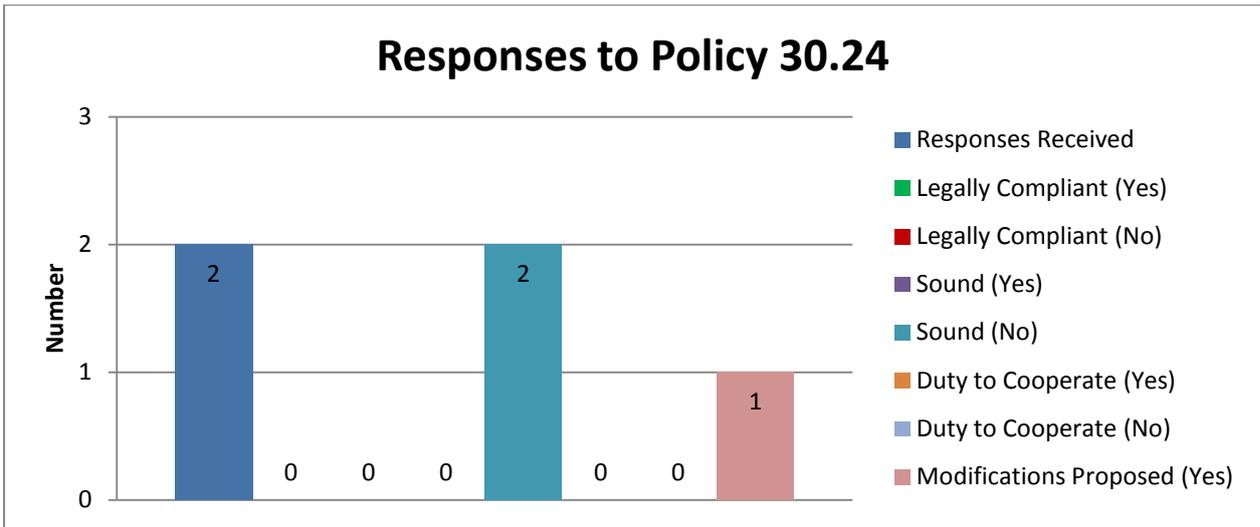


There were no responses to Policy 30.18 164/5 Sutton Park Road FPH/19.

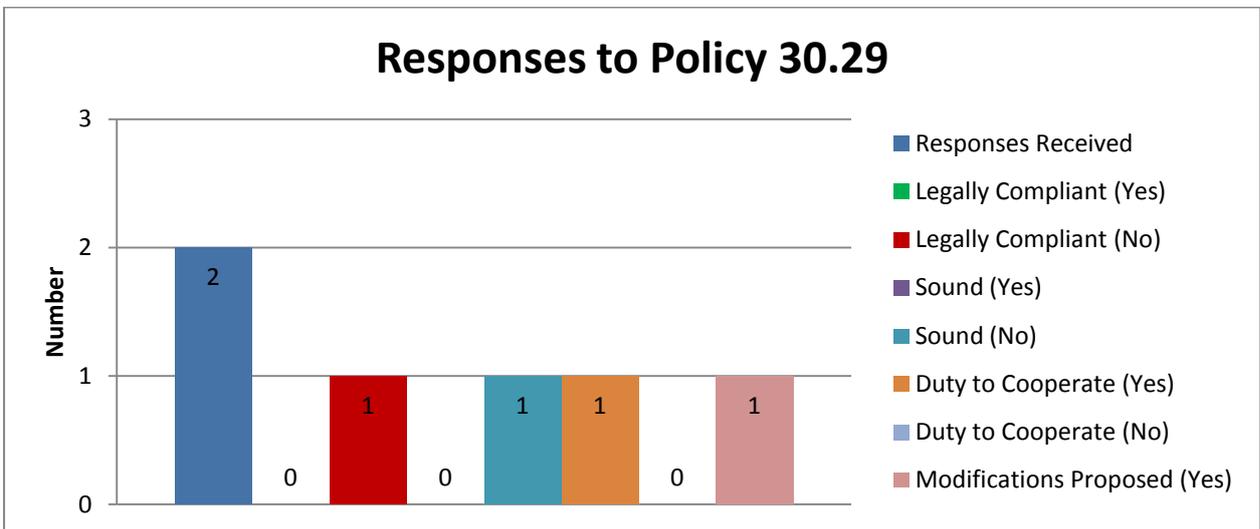


There were no responses to Policy 30.20 Sion Hill School Site WFR/WC/18.





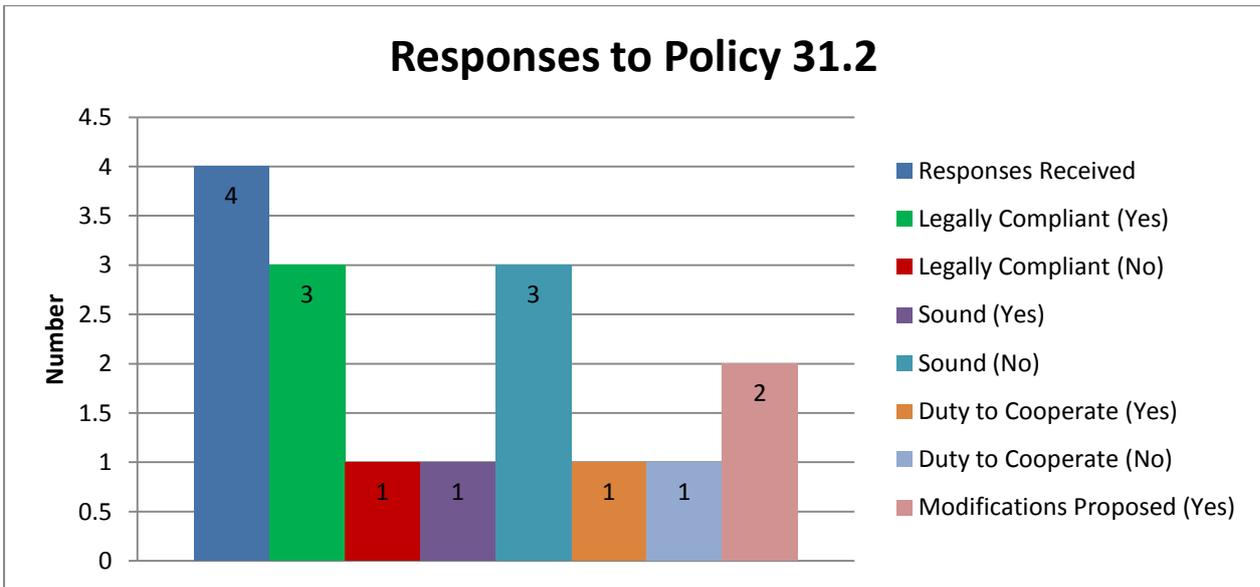
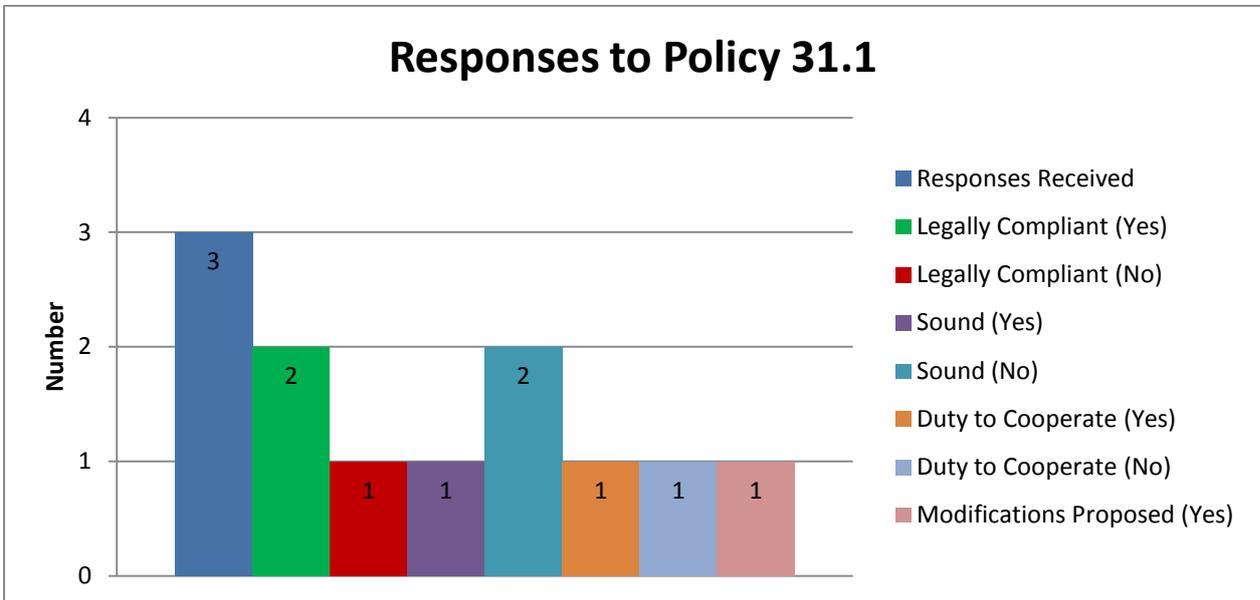
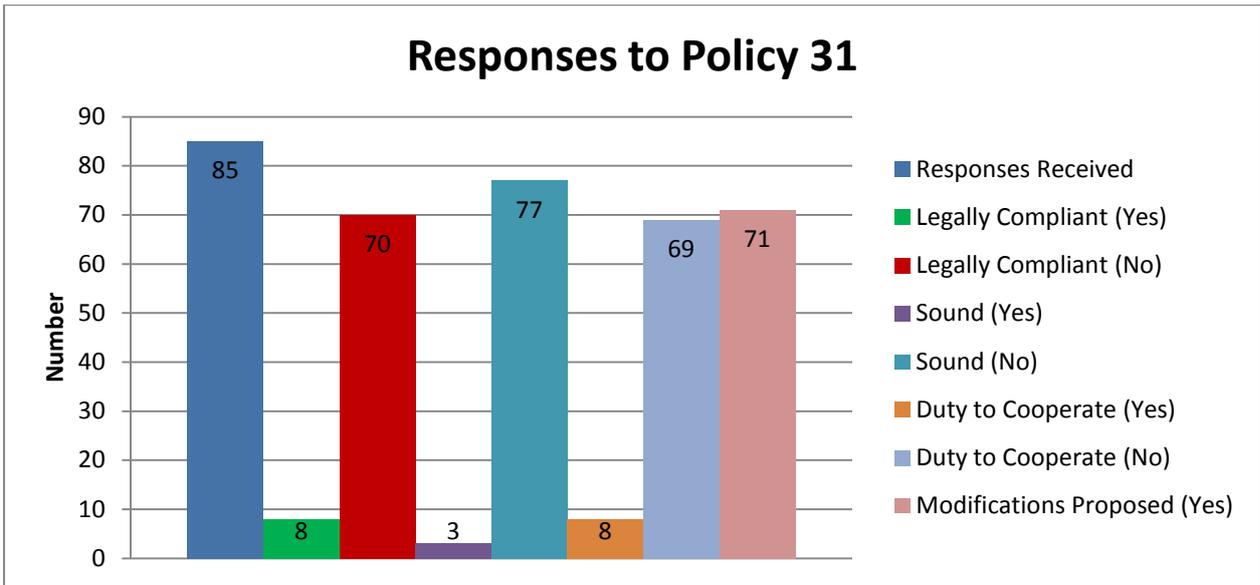
There were no responses to Policy 30.25 SDF site FPH/8 Policy 30.26 Easter Park extension FPH/27, Policy 30.27 Land at Hoobrook FPH/28 and Policy 30.28 VOSA FPH/29.



Chapter 31 – Lea Castle Village

The policies contained within Chapter 31 are:

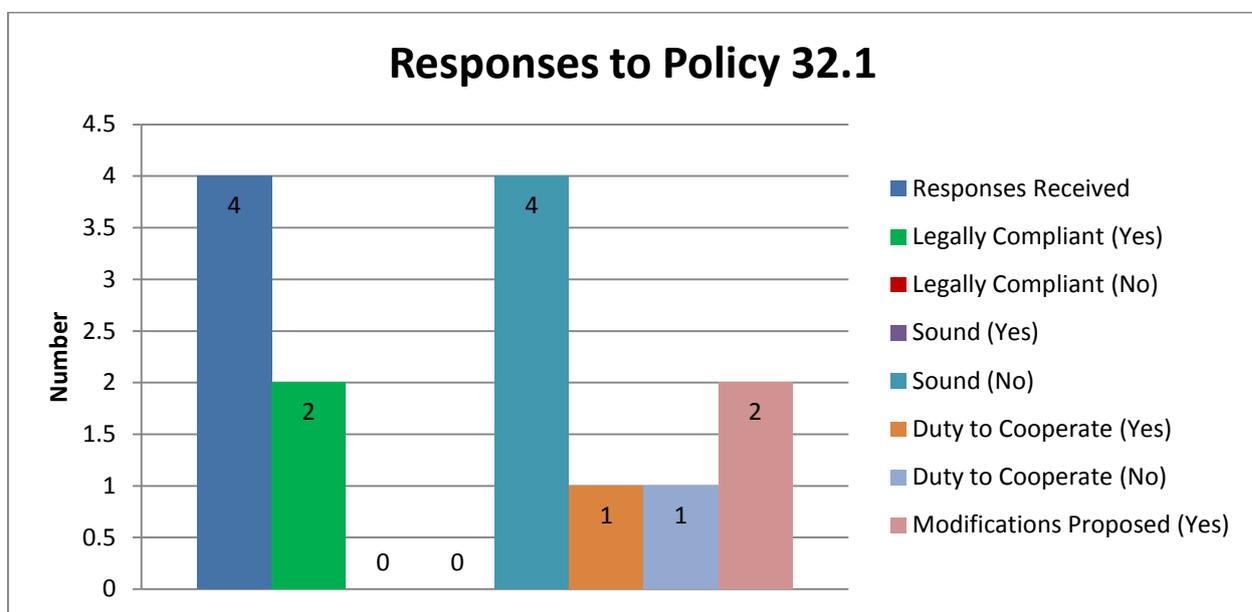
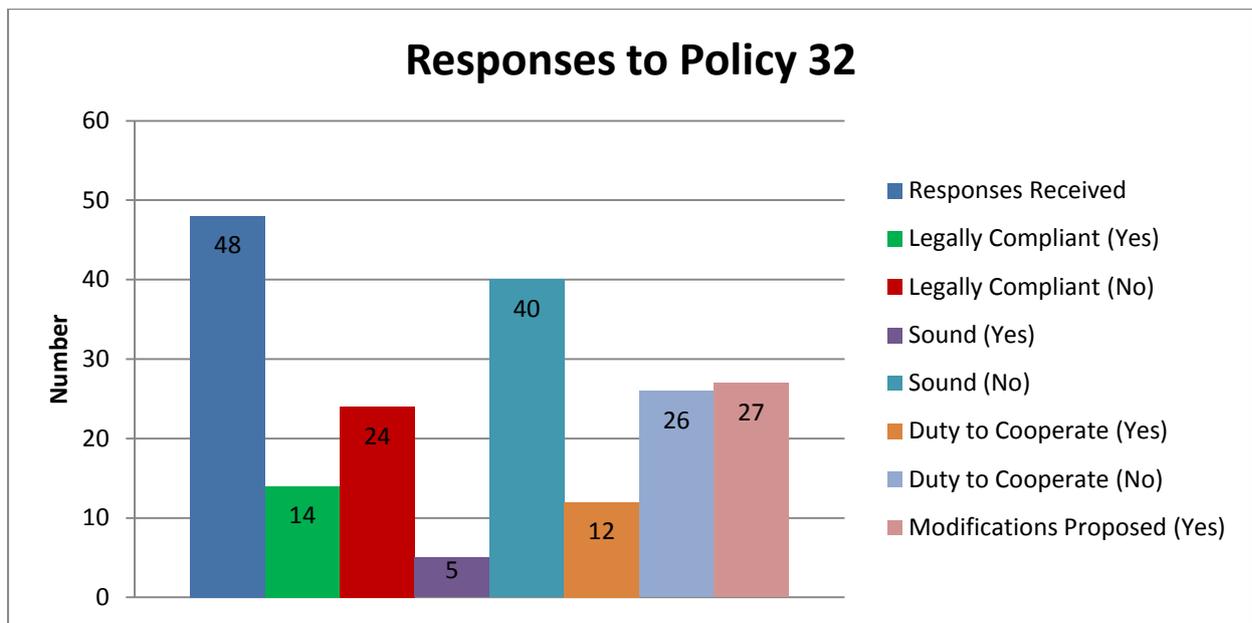
- Policy 31 - Lea Castle Village
- Policy 31.1 Lea Castle Village vision
- Policy 31.2 Lea Castle Village Principles of Development

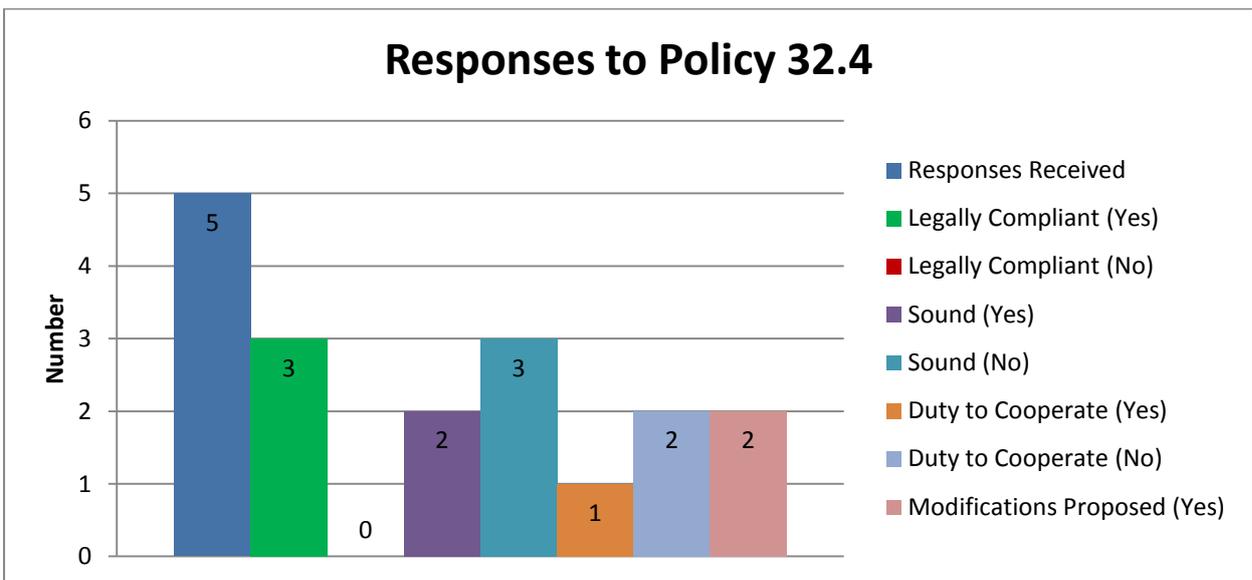
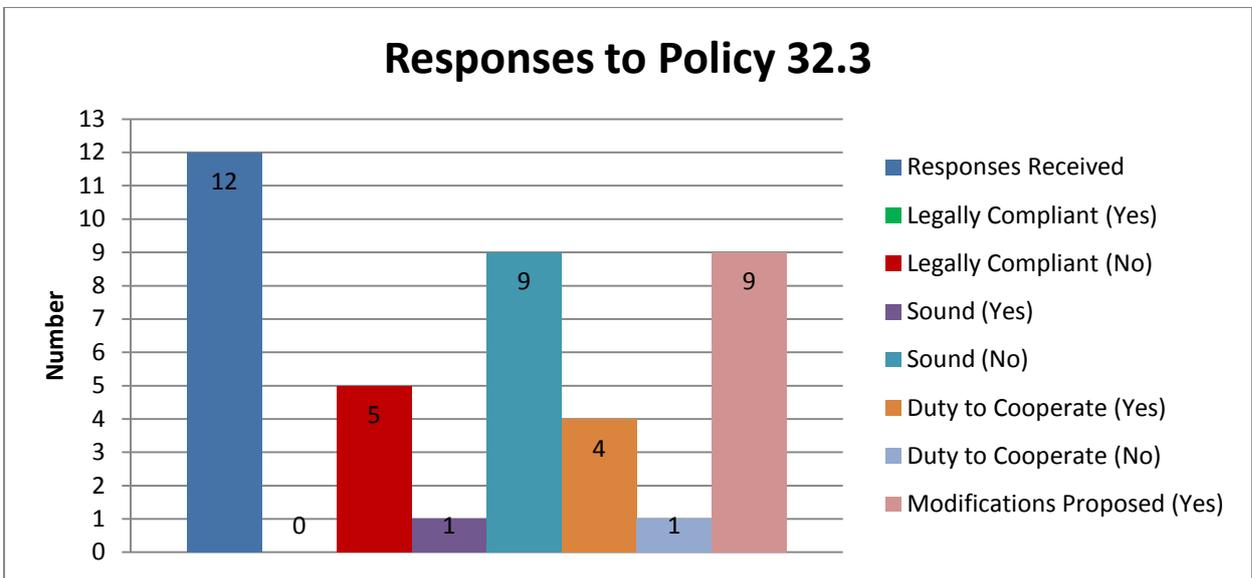
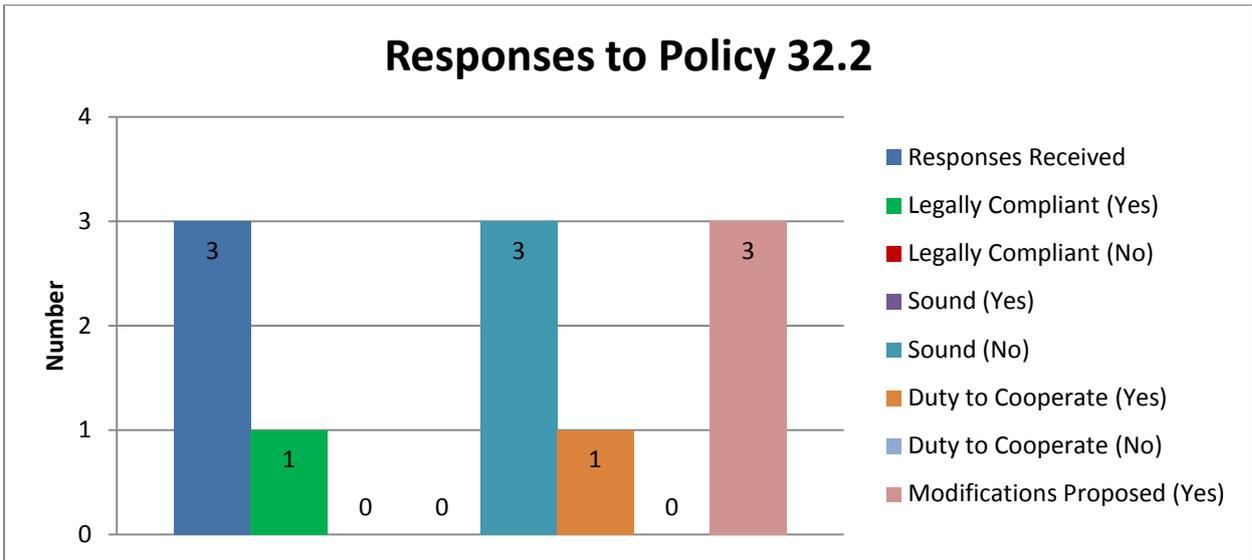


Chapter 32 – Kidderminster Eastern Extension

The policies contained within Chapter 32 are:

- Policy 32 - Kidderminster Eastern Extension
- Policy 32.1 Land at Husum Way OC/5
- Policy 32.2 Comberton Lodge Nursery OC/12
- Policy 32.3 Land East of Offmore (OC/6) and Land at Stone Hill North (OC/13N) Overall Vision
- Policy 32.4 Site specific Principles of Development

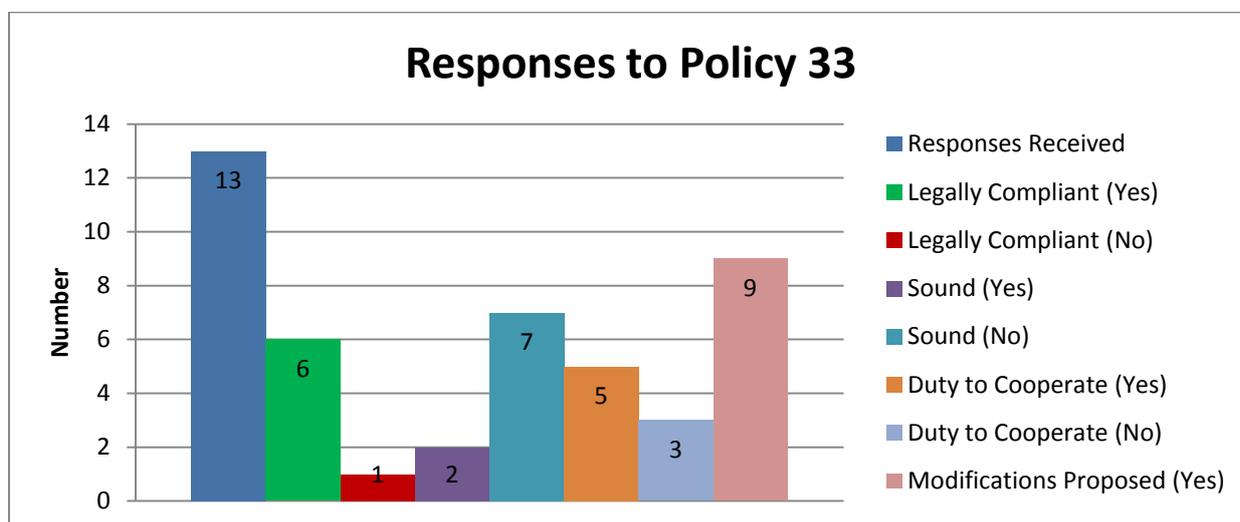




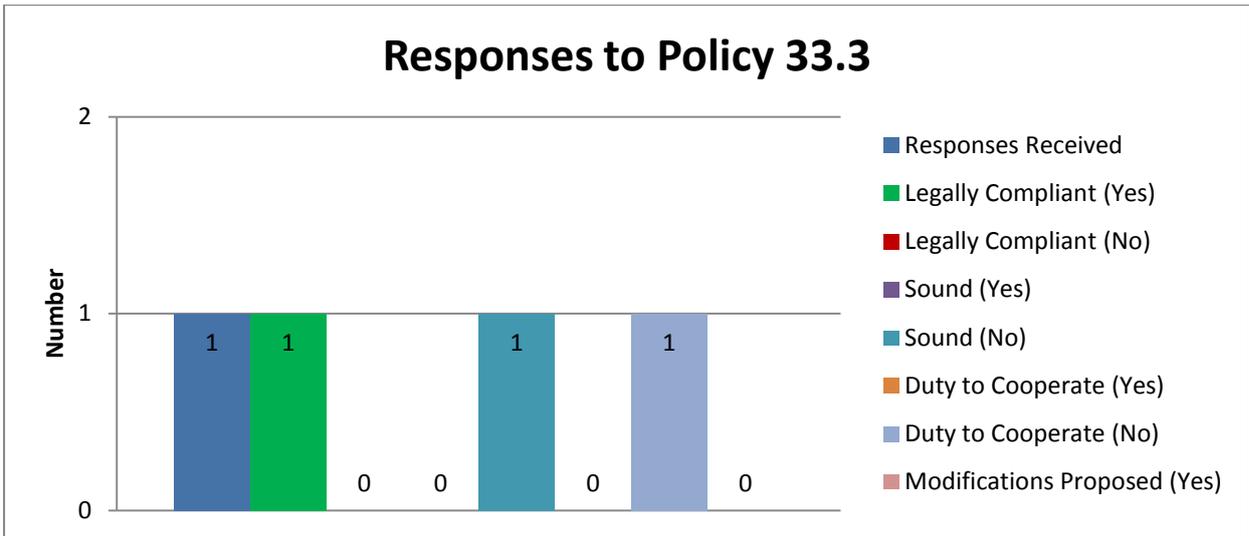
Chapter 33 – Stourport-on-Severn

The policies contained within Chapter 33 are:

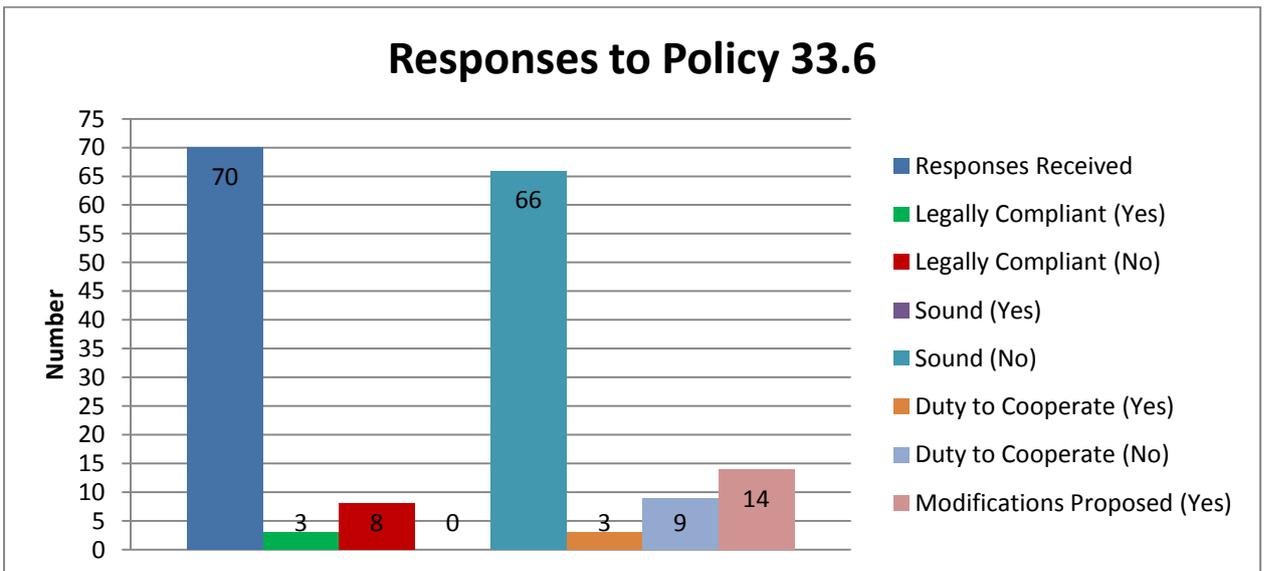
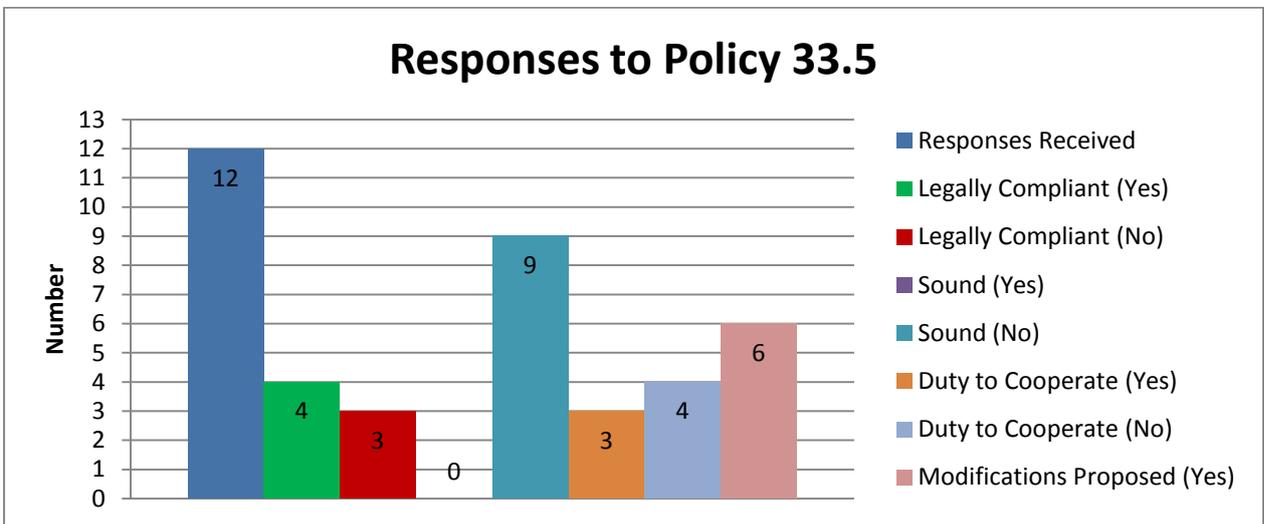
- Policy 33 Stourport-on-Severn Site Allocations
- Policy 33.2 Cheapside AKR/2
- Policy 33.3 Swan Hotel / Working Men’s Club AKR/7
- Policy 33.4 Queens Road Shops AKR/10
- Policy 33.5 Pearl Lane AKR/14
- Policy 33.6 Yew Tree Walk AKR/18
- Policy 33.7 Former Carpets of Worth AKR/20
- Policy 33.8 Land west of former school site Coniston Crescent LI/11
- Policy 33.9 County Buildings MI/1
- Policy 33.10 Baldwin Road MI/5
- Policy 33.11 Steatite Way MI/6
- Policy 33.12 Worcester Road Car Sales (southern part) MI/7
- Policy 33.13 Four Acres Caravan Park MI/10
- Policy 33.14 Land at 3 Sandy Lane Totton MI/11
- Policy 33.15 Land adjacent Rock Tavern Wilden Lane MI/24
- Policy 33.16 School site Coniston Crescent MI/38
- Policy 33.17 Firs View Yard Wilden Lane MI/36
- Policy 33.18 Parsons Chain MI/3
- Policy 33.19 North of Wilden Lane Industrial Estate MI/18
- Policy 33.20 Wilden Lane Industrial Estate MI/33
- Policy 33.20 Minster Road Outdoor Sports Area



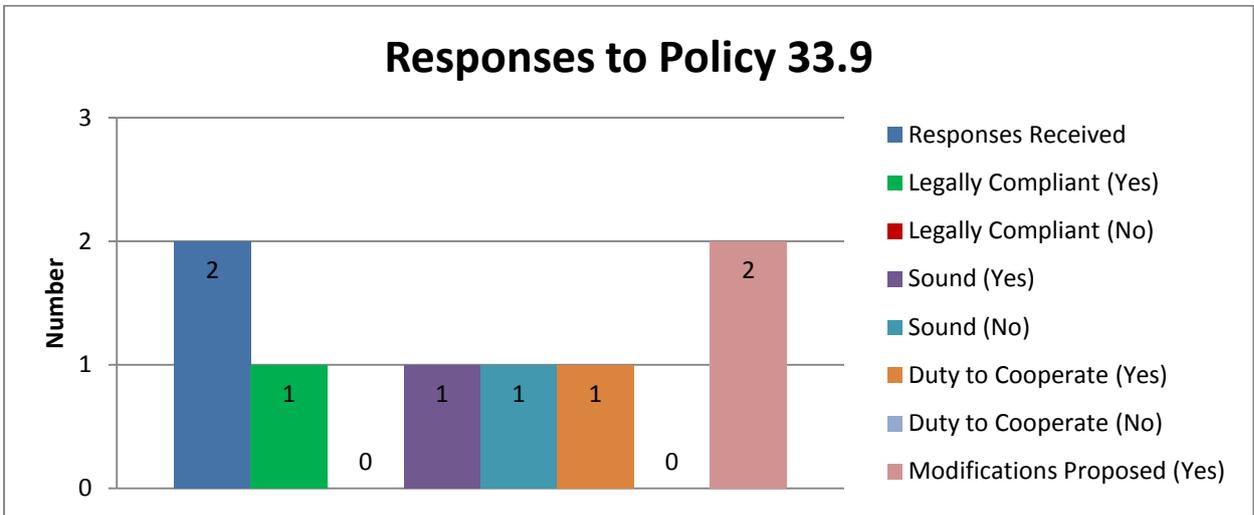
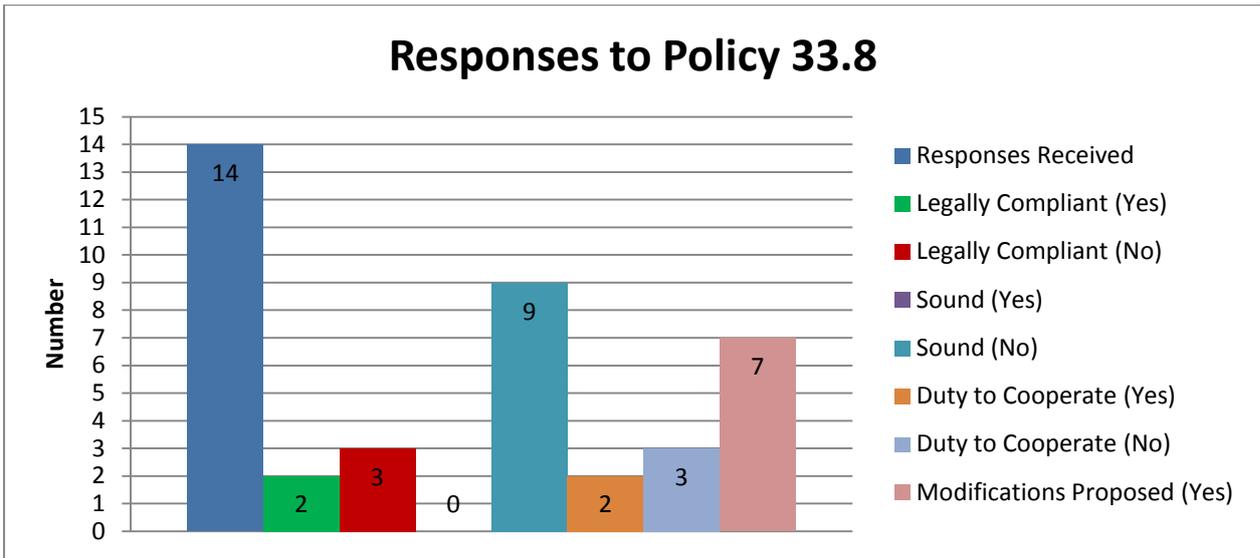
There were no responses to Policy 33.2 Cheapside AKR/2.



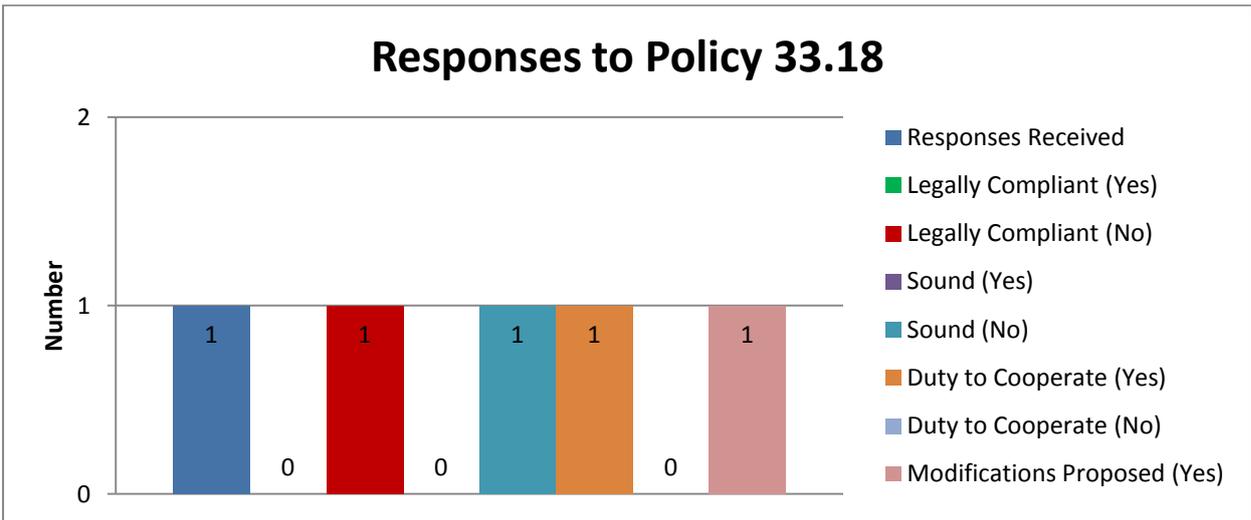
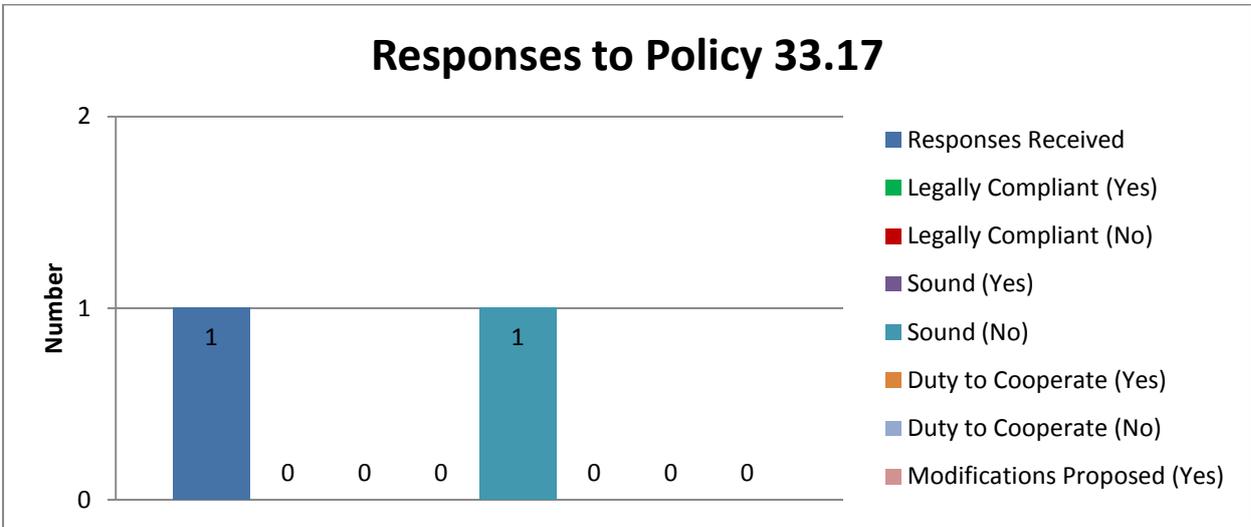
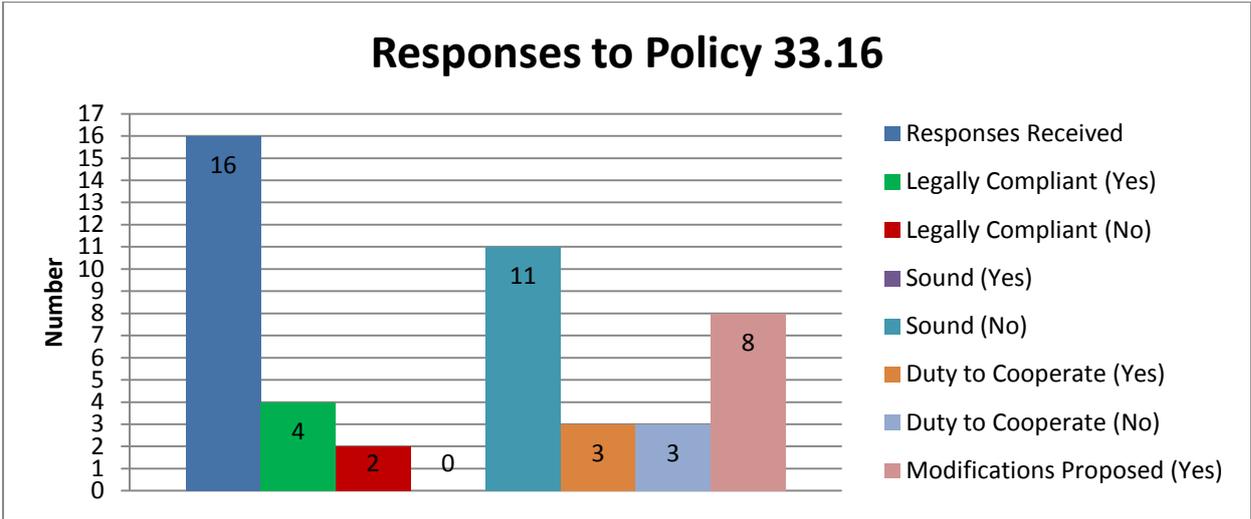
There were no responses to Policy 33.4 Queens Road Shops AKR/10.

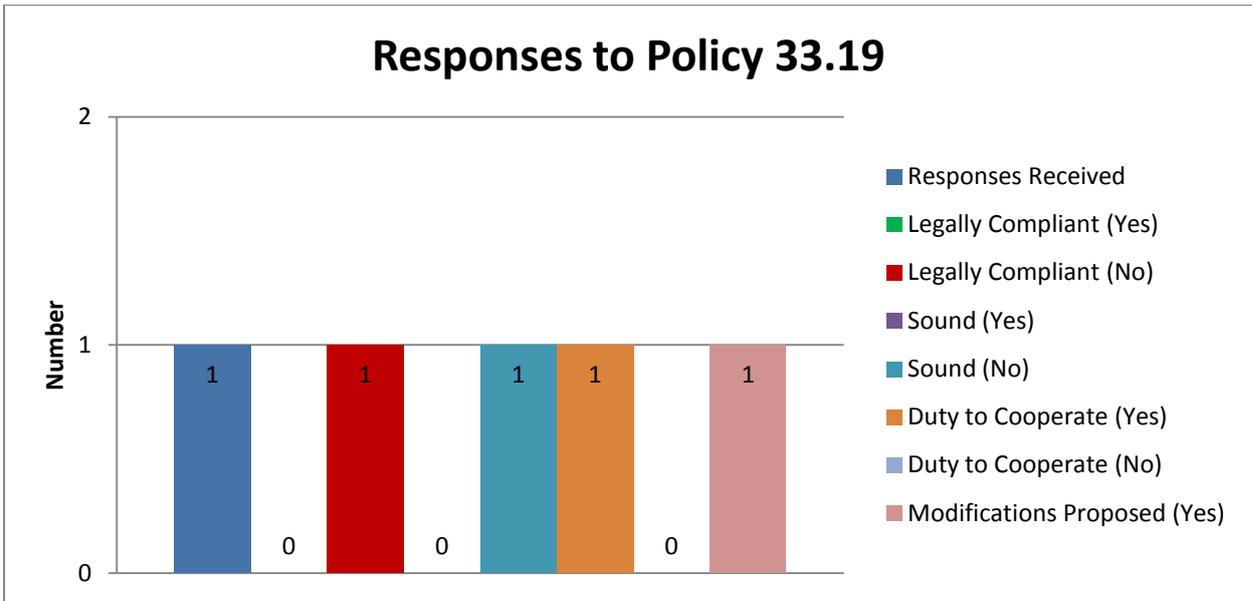


There were no responses for Policy 33.7 Former Carpets of Worth AKR/20.



There were no responses for Policy 33.10 Baldwin Road MI/5, Policy 33.11 Steatite Way MI/6, Policy 33.12 Worcester Road Car Sales (southern part) MI/7, Policy 33.13 Four Acres Caravan Park MI/10, Policy 33.14 Land at 3 Sandy Lane Titton MI/11 or Policy 33.15 Land adjacent Rock Tavern Wilden Lane MI/24.



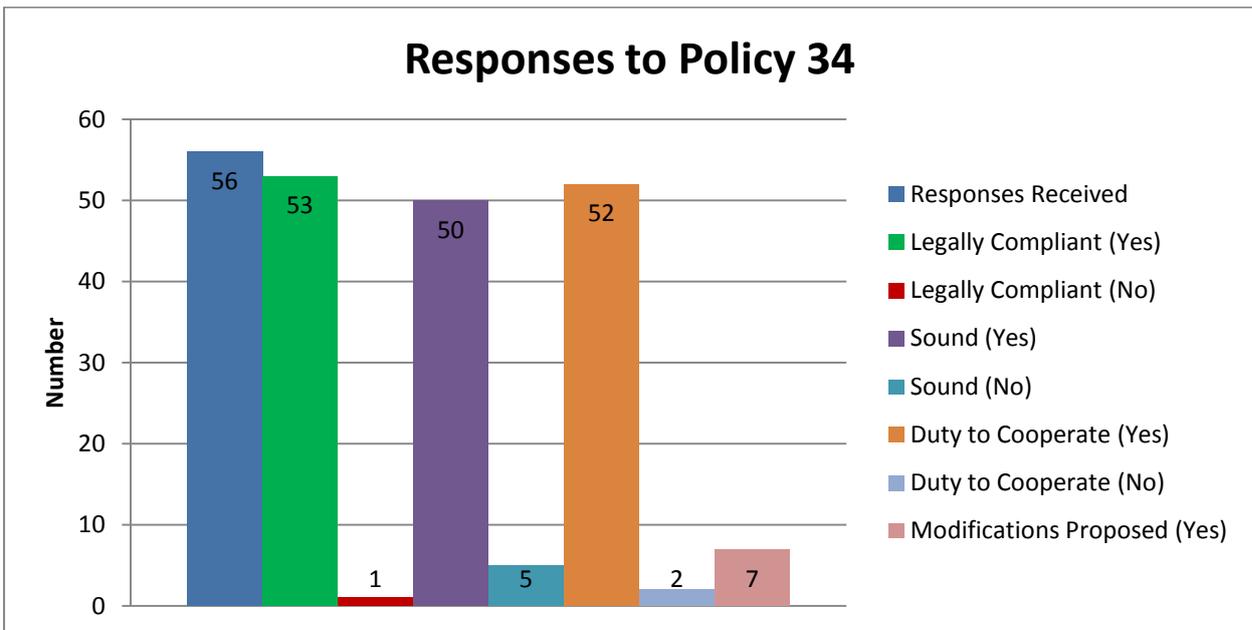


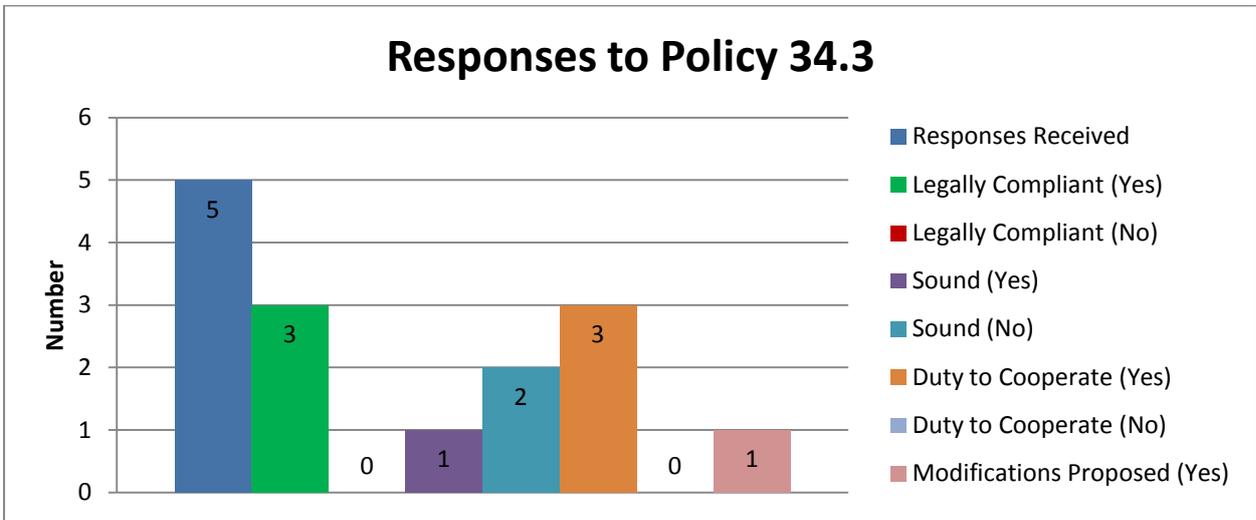
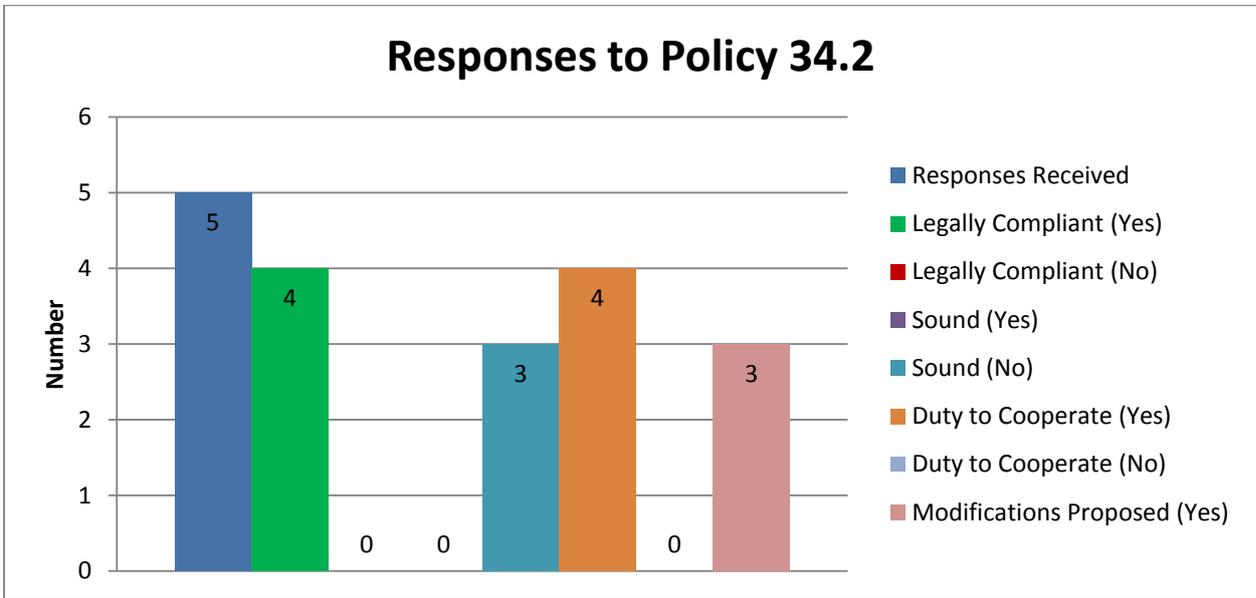
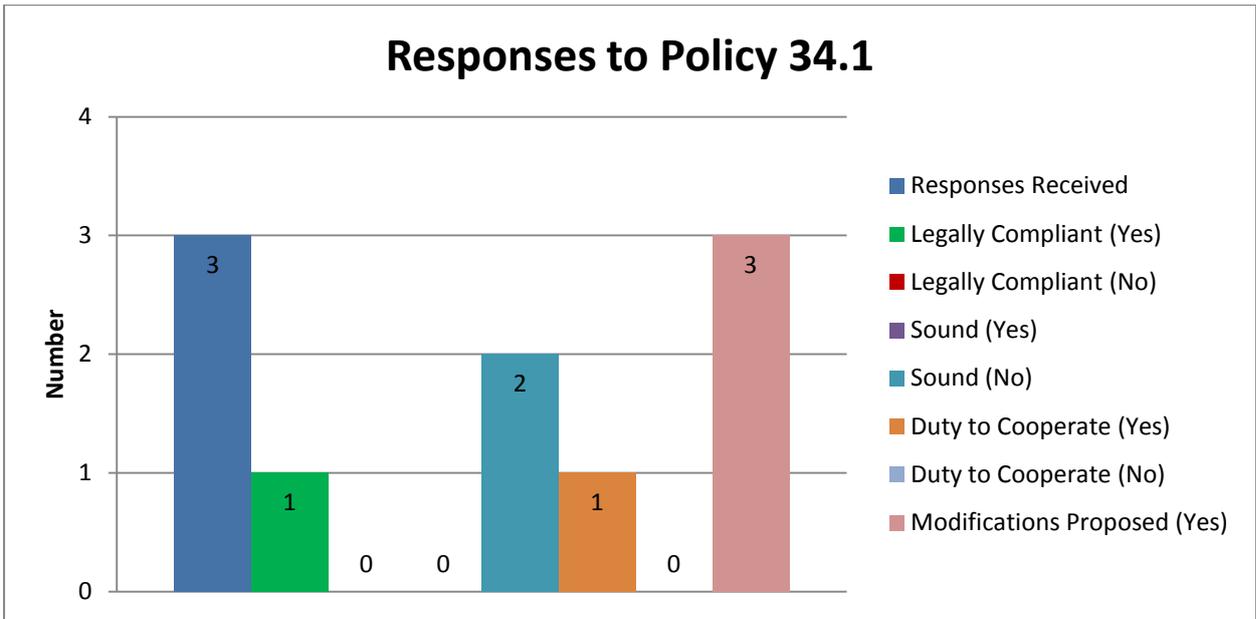
There were no responses for Policy 33.20 Wilden Lane Industrial Estate MI/33 or Policy 33.20 Minster Road Outdoor Sports Area.

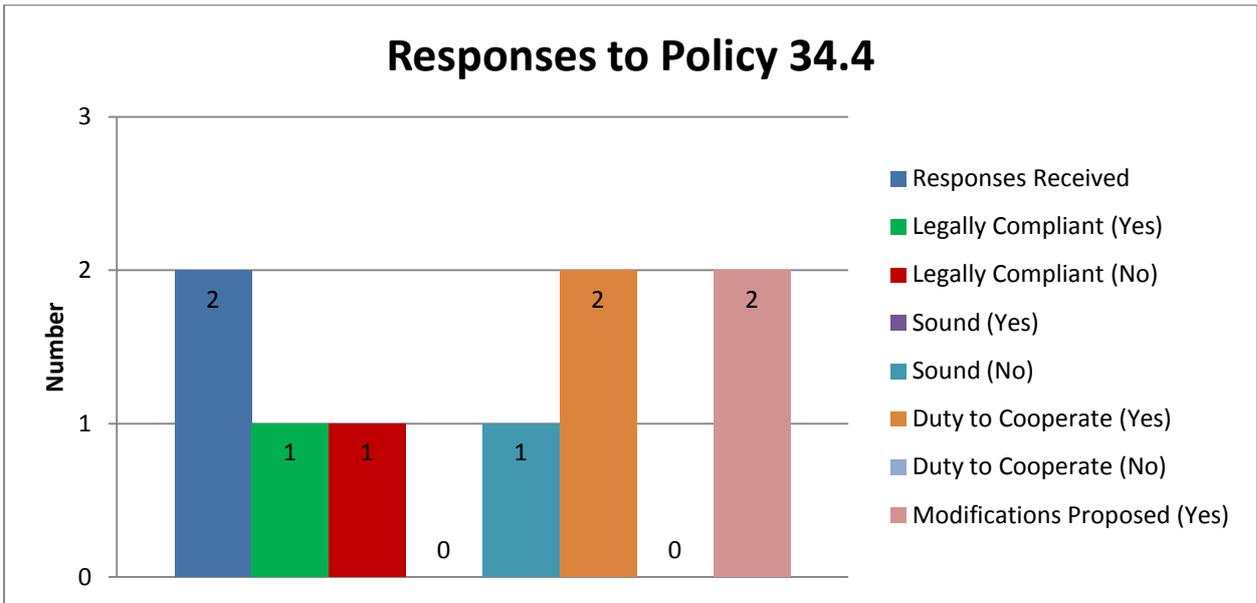
Chapter 34 - Bewdley

The policies contained within Chapter 34 are:

- Policy 34 - Bewdley Site Allocations
- Policy 34.1 - Bewdley Fire Station BR/BE/1
- Policy 34.2 - Stourport Road Triangle WA/BE/1
- Policy 34.3 - Catchem's End WA/BE/3
- Policy 34.4 - Land south of Habberley Road WA/BE/5



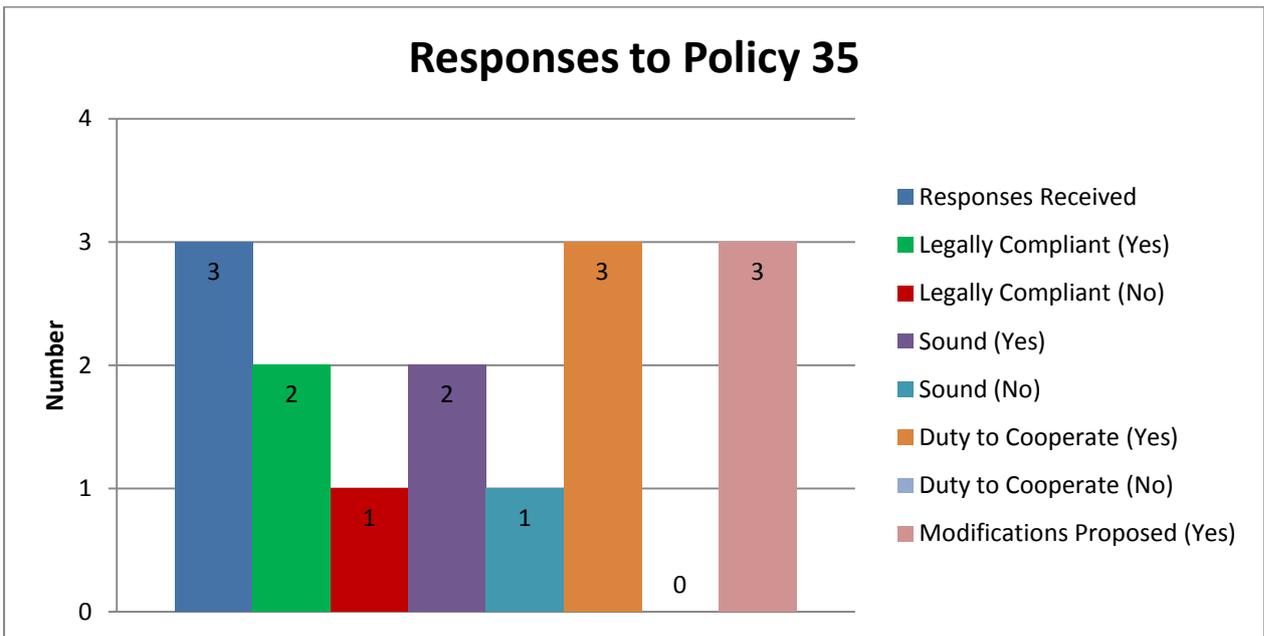




Chapter 35 – Previously developed Sites in the Green Belt

The policies contained within Chapter 35 are:

- Policy 35 - Previously Developed Sites in the Green Belt

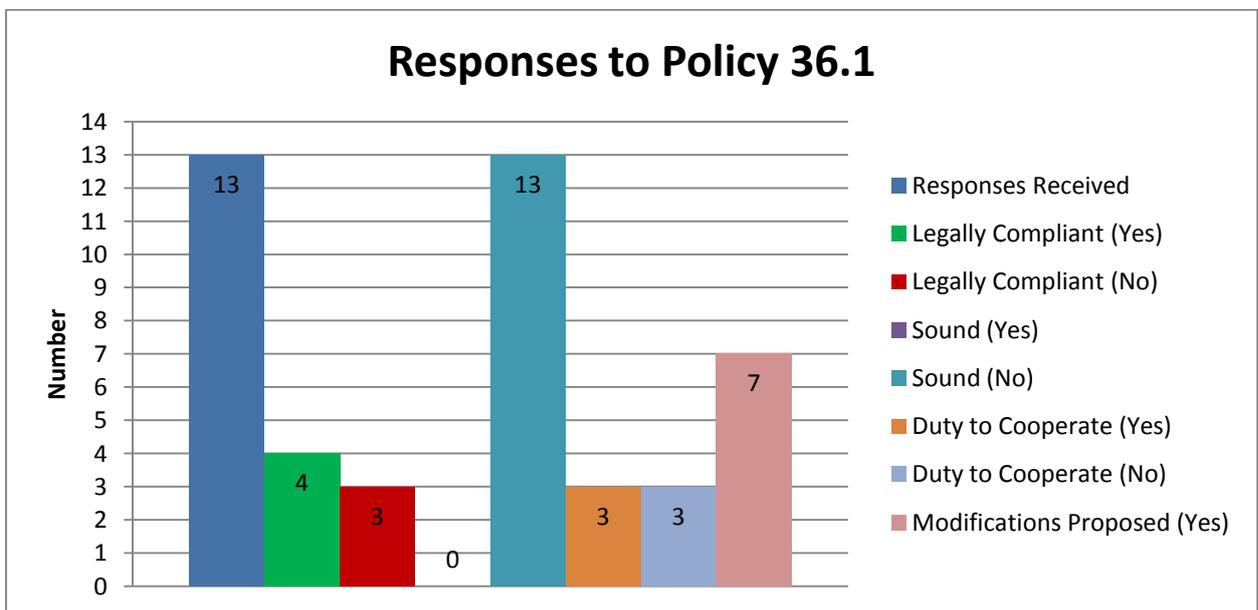
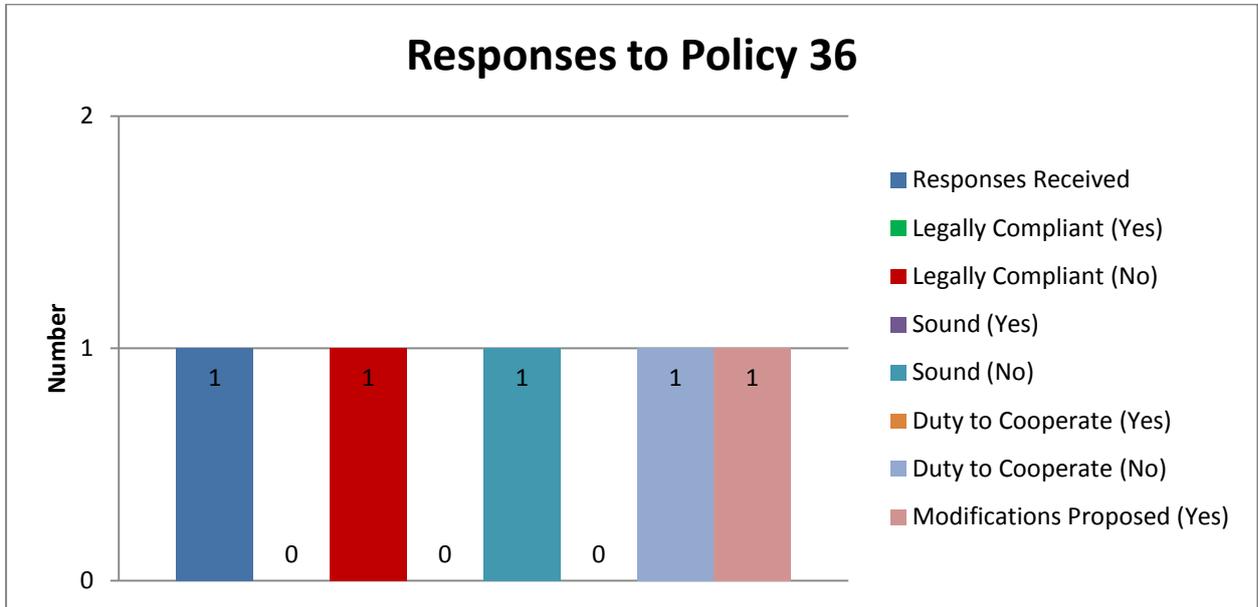


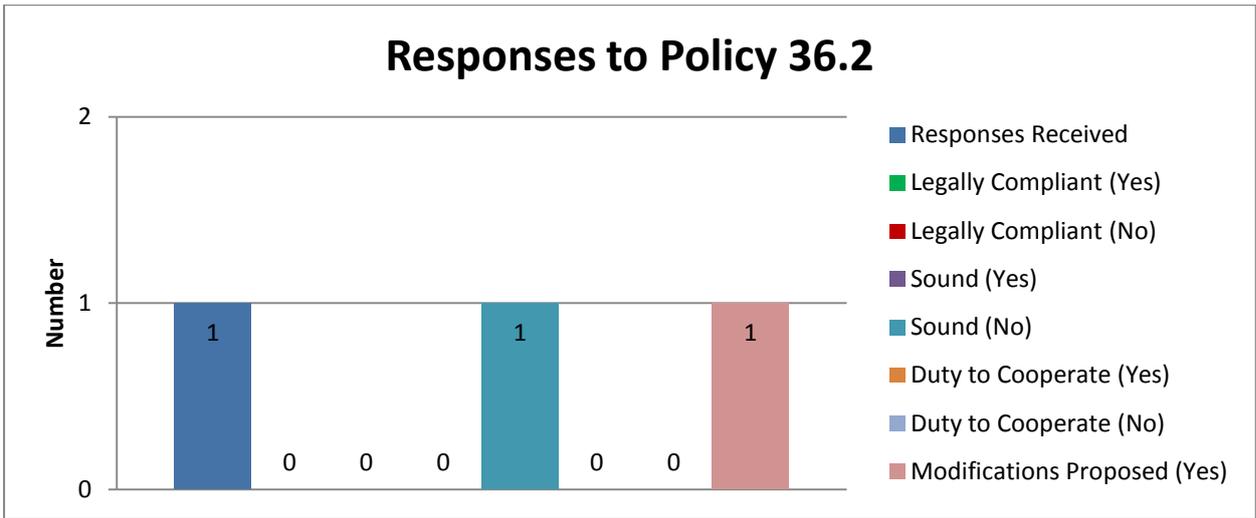
Chapter 36 – Rural Wyre Forest

The policies contained within Chapter 36 are:

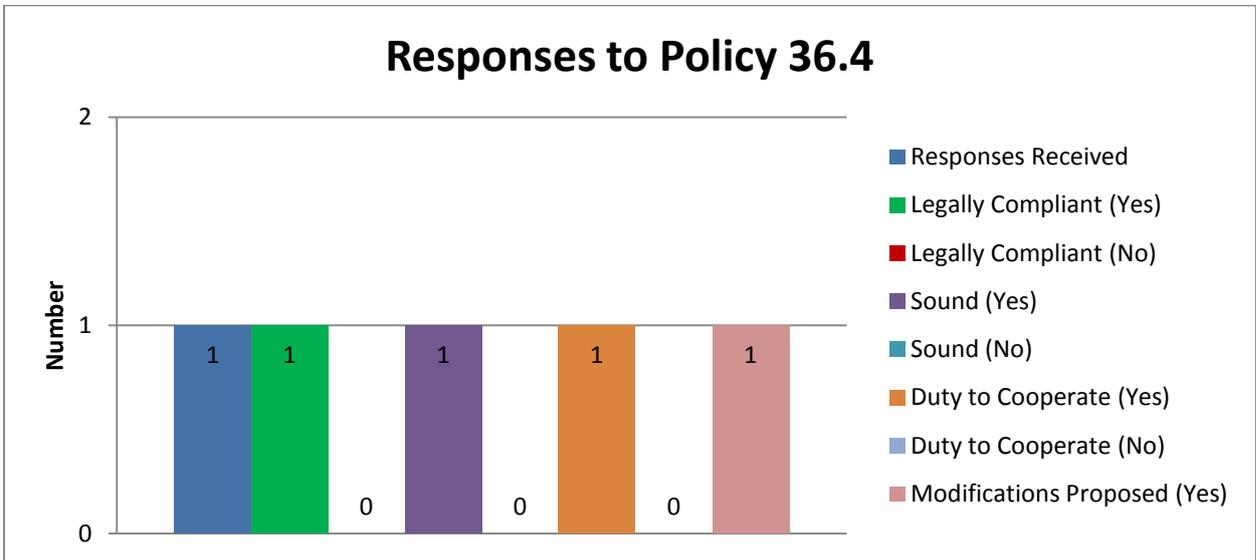
- Policy 36 Villages and Rural Areas Site Allocations
- Policy 36.1 Lem Hill Nurseries BR/RO/2
- Policy 36.2 Alton Nurseries Long Bank BR/RO/21
- Policy 36.3 Bellman's Cross Shatterford WA/UA/1
- Policy 36.4 Allotments, Upper Arley WA/UA/4

- Policy 36.5 Red Lion Car Park WA/UA/6
- Policy 36.6 Station Yard Blakedown WFR/CB/2
- Policy 36.7 Fold Farm Chaddesley Corbett WFR/CC/8
- Policy 36.8 Land at Lowe Lane Fairfield WFR/WC/22
- Policy 36.9 Rock Tavern Car Park Caunsall WFR/WC/36
- Policy 36.10 Land at Caunsall Road Caunsall WFR/WC/37

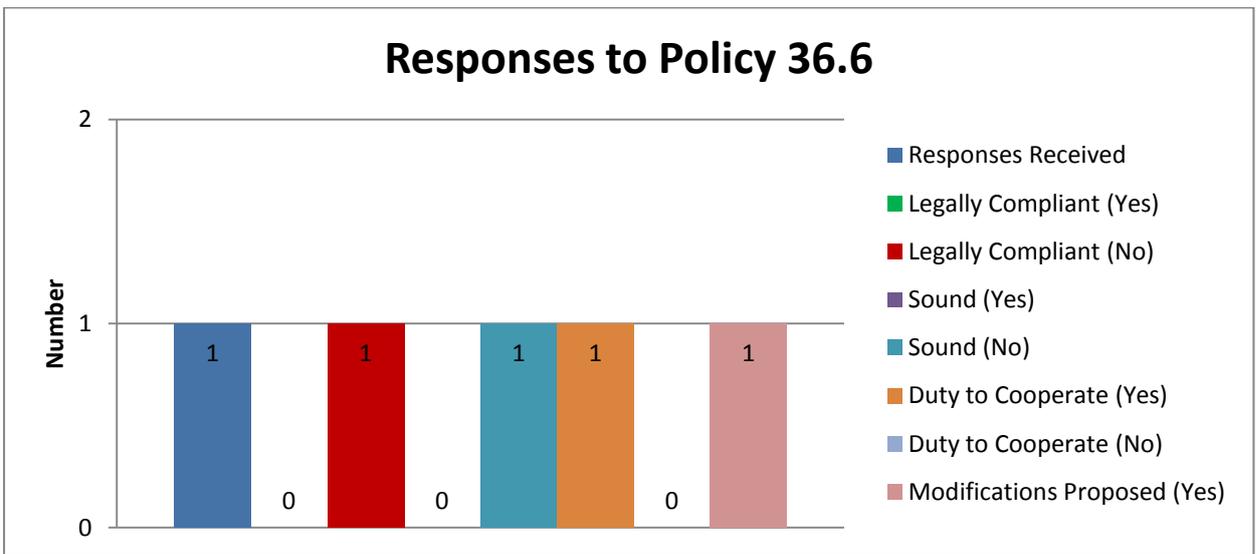


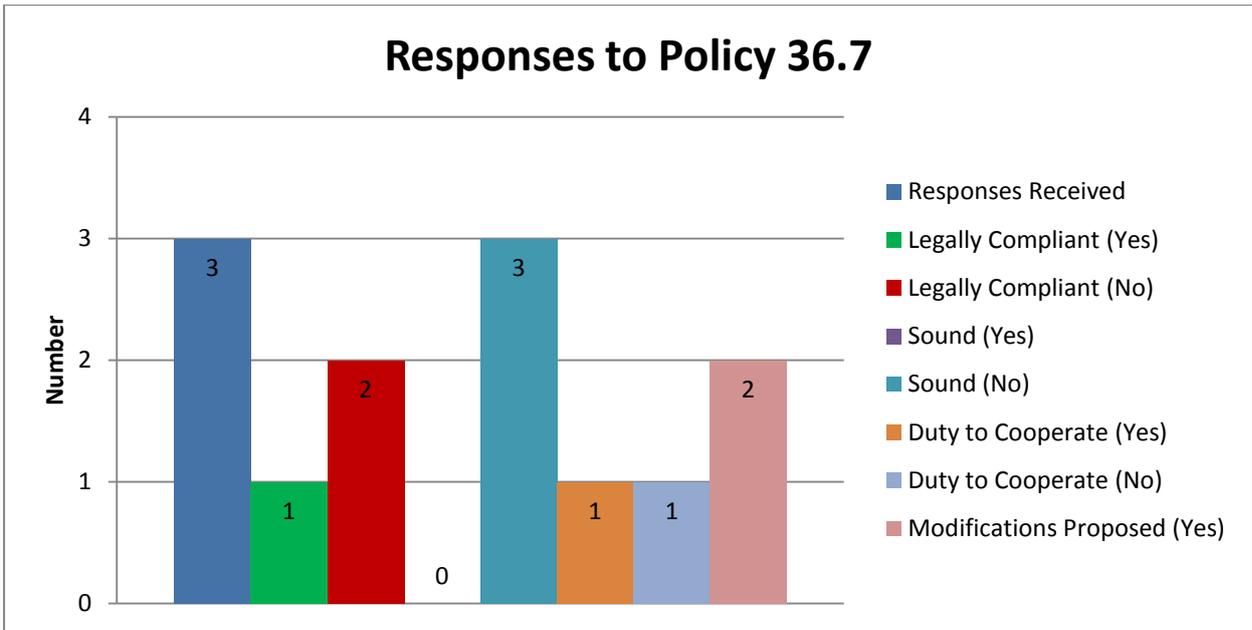


There were no responses to Policy 36.3 Bellman's Cross Shatterford WA/UA/1.

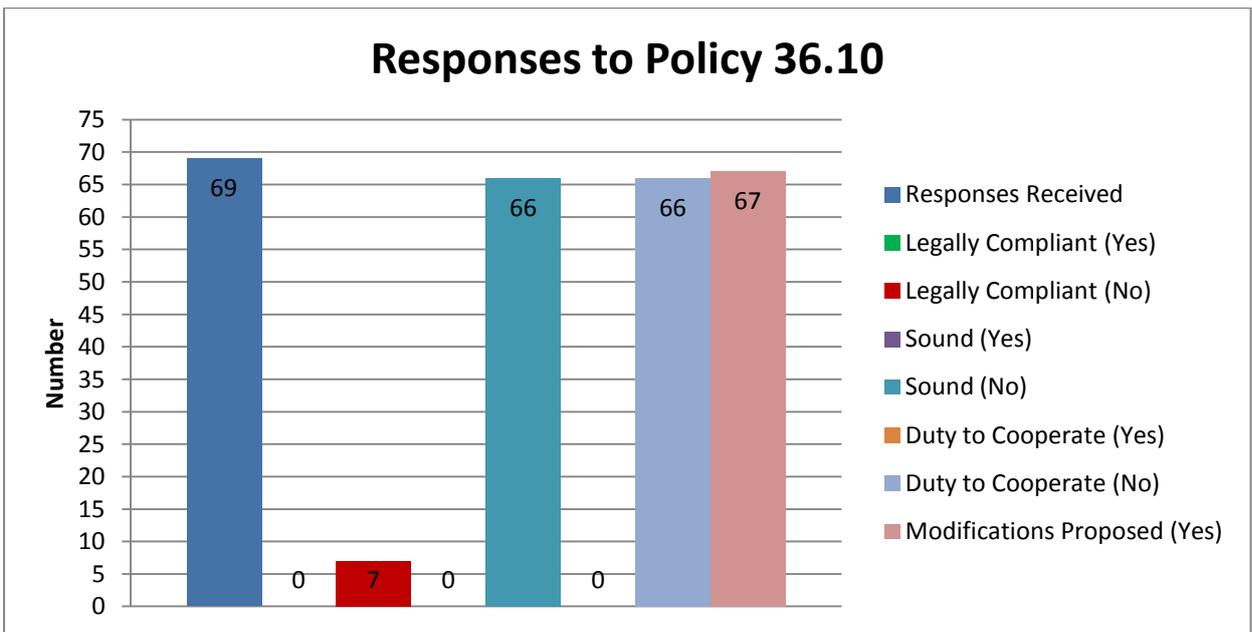


There were no responses to Policy 36.5 Red Lion Car Park WA/UA/6.





There were no responses to Policy 36.8 Land at Lowe Lane Fairfield WFR/WC/22 or Policy 36.9 Rock Tavern Car Park Causall WFR/WC/36.



Chapter 37 – Monitoring and Implementation Framework

There are no policies in Chapter 37.

Wyre Forest District Local Plan Pre-Submission Publication 2018

Consultation Response Form

1st November – 17th December 2018

REF OFFICE USE ONLY:

Representor number:

Representation number:

Plan reference:

Tests of soundness:

This form has two parts: **Part A** Personal Details and **Part B** Your Representation

To help present your comments in the best way for the inspector to consider them, the Planning Inspectorate has issued this standard comment form for you to complete and return. We ask that you use this form because it structures your response in the way in which the inspector will consider comments at the public examination. Using the form to submit your comments also means that you can register your interest in speaking at the examination.

Please read the guidance notes carefully before completing the form.

Please fill in a separate part B for each issue/representation you wish to make.

Any additional sheets must be clearly referenced. This form can be submitted electronically. If hand writing, please write clearly in blue or black ink.

Consultation response forms can be completed and submitted online at www.wyreforestdc.gov.uk/localplanreview

Representations must be received by 5:00pm on 17th December 2018. Representations received after this time will not be considered duly made.

Part A

(Please complete in full; in order for the Inspector to consider your representations you must provide your name and postal address).

1. Personal Details		2. Agent's Details (if applicable)
Title		
First Name		
Last Name		
Organisation (where relevant)		
Job title (where relevant)		
Address – line 1		
Address – line 2		
Address – line 3		
Address – line 4		
Address – line 5		
Postcode		
E-mail Address		
Telephone Number		

Part B - Please use a separate sheet for each representation

Your representation should cover all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation

3. To which part of the Local Plan does this representation relate?

Paragraph

Policy

Other: e.g. Policies map, table, figure, key diagram

4. Do you consider the Local Plan is:

4.1 Legally Compliant

Yes

No

4.2 Sound

Yes

No

4.3 Complies with the Duty to co-operate

Yes

No

5. If you do not consider the Local Plan is sound, please specify on what grounds

Positively Prepared

Justified

Effective

Consistent with National Policy

Please Tick as appropriate

6. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the Duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the Duty to co-operate, please also use this box to set out your comments.

Expand Box / Continue on a separate sheet if necessary

7. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the Matter you have identified at 6 above where this relates to soundness. (NB Please note that any non-compliance with the Duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Expand box / continue on a separate sheet if necessary

Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. **After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No I do not wish to participate at the oral examination.

Yes I would like to participate at the oral examination.

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

Expand box / continue on a separate sheet if necessary

***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

Data Protection

The information you provide on the form will be stored on a database used solely in connection with the Local Plan. Representations will be available to view on the council's website, but address, signature and contact details will not be included. However, as copies of representations must be made available for public inspection, they cannot be treated as confidential and will be available for inspection in full. Copies of all representations will also be provided to the Planning Inspectorate as part of the submission of the Wyre Forest District Local Plan. By submitting this form you are agreeing to these conditions.

Please see the Councils Data Protection and Privacy statement:

<http://www.wyreforestdc.gov.uk/the-council/data-protection-and-privacy.aspx>

If you are submitting this form electronically you will need to agree to our data protection policy. Please tick here if you agree.

Signature

Date

Please return the completed form by **no later than 5:00pm on 17 December 2018** to:

Email: LPR@wyreforestdc.gov.uk

Or post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, DY11 7WF

Consultation response forms can be completed and submitted online at: www.wyreforestdc.gov.uk/localplanreview

Wyre Forest District Council – Local Plan Pre-Submission Consultation

Guidance Note for Consultation Response Form

Where do I send my completed consultation response form?

Please return the completed consultation response form by **5pm on Monday 17th December 2018**.

Response forms may be submitted to the Council in the following ways:

Online at: www.wyreforestdc.gov.uk/localplanreview

Via email to: LPR@wyreforestdc.gov.uk

Post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF.

Please note that late representations cannot be accepted.

You can complete the form online or download electronic copies at:

www.wyreforestdc.gov.uk/localplanreview

What can I make comments on?

You can make representations on any part of the publication draft of the Local Plan, Policies Map or Sustainability Appraisal. Comments may also refer to the justification and evidence in the supporting technical evidence base documents. The purpose of this consultation is for you to say whether you think the plan is legally compliant and 'sound'. These terms are explained as follows:-

Legal compliance

To be legally compliant the Local Plan has to be prepared in accordance with the Duty to Co-operate and legal and procedural requirements, including the 2011 Localism Act and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Soundness

Soundness is explained in paragraph 35 of the National Planning Policy Framework (NPPF). The Planning Inspector conducting the Examination in Public has to be satisfied that the Local Plan is 'sound' – namely that it is:

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

- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework (NPPF).

Do I have to use the consultation response form?

Yes please. This is because further changes to the Local Plan will be a matter for a Planning Inspector to consider and providing responses in a consistent format is important. For this reason, all responses should use this consultation response form. Please be as succinct as possible and use one response form for each representation you wish to make (topic or issue you wish to comment on). You can attach additional evidence to support your case, but please ensure that it is clearly referenced. It will be a matter for the Planning Inspector to invite additional evidence of, or during the Public Examination.

Additional consultation response forms can be downloaded from the Council's website at www.wyreforestdc.gov.uk/localplanreview or use the **online consultation portal** to submit your comments. Hardcopies can also be collected from the main Council Offices and the Customer Service Centre. However you choose to respond, in order for the Planning Inspector to consider your comments you must provide your name and address with your response.

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

Due to recent changes in Data Protection Law, we will only accept responses submitted using the consultation response form.

Can I submit representations on behalf of a group or neighbourhood?

Yes, you can. Where there are groups who share a common view on how they wish to see the plan modified, it would be very helpful for that group to send a single representation that represents that view, rather than for a large number of individuals to send in separate representations that repeat the same points. In such cases the group should indicate how many people it is representing; a list of their names and addresses, and how the representation has been agreed e.g. via a parish council/action group meeting; signing a petition etc. The representation should still be submitted on the standard consultation response form with the information attached. Please indicate in Part A of this form the group you are representing.

Do I need to attend the Public Examination?

You can indicate whether at this stage you consider there is a need to present your representation as a hearing session during the Public Examination. You should note that Planning Inspectors do not give any more weight to issues presented in person than written evidence. The Planning Inspector will use his/her own discretion in regard to who participates at the Public Examination. All examination hearings will be open to the public.

Where can I view the Wyre Forest Local Plan Pre-Submission Publication Consultation documents?

You can view the Local Plan consultation documents:

- **Online** via our website: www.wyreforestdc.gov.uk/localplanreview
- Council Offices:
 - Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF
 - Customer Service Centre (The Hub), Town Hall, Vicar Street, Kidderminster, DY10 1DB
- Libraries:
 - Kidderminster Library – Market Street, Kidderminster, DY10 1AB
 - Stourport Library – Civic Centre, New Street, Stourport on Severn, DY13 8UN
 - Bewdley Library – Dog Lane, Bewdley, DY12 2EF

Or by visiting any of the drop-in sessions being held during the public consultation period.

List of Drop-in Sessions:

Date	Time	Venue
Friday 16 th November 2018	3pm – 7pm	Cookley Village Hall
Saturday 17 th November 2018	10am – 2pm	Offmore Evangelical Church Hall, Kidderminster
Tuesday 20 th November 2018	5:30pm – 8pm	Heronwood Primary School, Spennells, Kidderminster
Friday 23 rd November 2018	3pm – 7pm	Areley Kings Village Hall
Saturday 24 th November 2018	10am – 2pm	Stourport Civic Hall
Tuesday 27 th November 2018	3pm – 7pm	St Georges Hall, Bewdley
Thursday 29 th November 2018	3pm – 7pm	Kidderminster Town Hall
Friday 30 th November 2018	3pm – 7pm	St Oswalds Church Centre, Broadwaters Drive, Kidderminster

**Have
your
say**

Our Local Plan 2016-2036

Pre-submission consultation

We are planning for this generation and the next with our Local Plan 2016-2036

We need to make sure that we have enough homes in the district to meet our current housing need as well as for our children and grandchildren. We want the local economy to grow and offer employment opportunities for them too. To achieve this we need to make land available across the district – for homes and businesses. The Local Plan identifies the sites where the developments will go.

Your views are important

From **Thursday 1 November** to **Monday 17 December** we are consulting on the pre-submission publication version of the Wyre Forest District Local Plan. This is your last chance to have your say before it is submitted to the Government's Planning Inspectorate to be examined.



Wyre Forest
District Council



then

now

the future?

Find out more online

You can view a copy of the Plan at:
www.wyreforestdc.gov.uk/localplanreview

Or in person at:

- Our Customer Service Centre at Kidderminster Town Hall
- Wyre Forest House, Finepoint Way, Kidderminster
- Kidderminster Library
- Stourport Library
- Bewdley Library



Our Local Plan 2016-36

Have your say

Visit any Local Plan drop-in session to find out more

Date	Location	Time
Friday 16 November	Cookley Village Hall	3pm – 7pm
Saturday 17 November	Offmore Evangelical Church Hall, Kidderminster	10am – 2pm
Tuesday 20 November	Héronswood Primary School, Kidderminster	5.30pm – 8pm
Friday 23 November	Areley Kings Village Hall, Stourport	3pm – 7pm
Saturday 24 November	Stourport Civic Hall	10am – 2pm
Tuesday 27 November	St George’s Hall, Bewdley	3pm – 7pm
Thursday 29 November	Kidderminster Town Hall	3pm – 7pm
Friday 30 November	St Oswald’s Church Centre, Kidderminster	3pm – 7pm

Making comments

To submit your comments complete the online form at www.wyreforestdc.gov.uk/localplanreview

The form can also be downloaded online and emailed to LPR@wyreforestdc.gov.uk

If you do not have internet access, copies of the form can be picked up from the drop-in sessions, our Customer Service Centre at Kidderminster Town Hall and Wyre Forest House. Send completed forms to:

Planning Policy Team
Wyre Forest District Council
Wyre Forest House
Finepoint Way
Kidderminster
Worcestershire
DY11 7WF

Deadline for comments:
5pm, Monday
17 December
2018

Comments must be submitted using the council’s Local Plan Consultation Response Form





Helen Smith
Spatial Planning Manager

tel: 01562 732928

fax: 01562 732556

email: LPR@wyreforestdc.gov.uk

my ref: HS/HET/FP-LPPRESUB

your ref:

date: 1 November 2018

Dear Sir/Madam

Wyre Forest District Local Plan Pre-Submission Publication (October 2018)
Consultation in compliance with Regulation 19 of the Town and Country Planning
(Local Planning) (England) Regulations 2012

I am writing to inform you about the opportunity to comment on the Local Plan Pre-Submission Publication (October 2018) document.

The emerging Local Plan aims to support the District's housing and economic growth, provide much needed housing and help shape future development over the next 15 years and beyond. It balances the need for housing and employment growth with protecting Wyre Forest's unique natural and built environment.

You may be aware that the Local Plan has been prepared over a number of stages. Previous consultation has taken place on Preferred Options (2017), and Issues and Options (2015), which you may have been involved with. The Council has considered the responses received at all stages, together with other available evidence, as part of preparation of the plan.

The Council is now publishing the Wyre Forest District Local Plan Pre-Submission Publication to provide an opportunity for representations to be made regarding legal compliance and the 'soundness' of the Local Plan, before it is submitted for Examination in Public by an independent Government appointed Planning Inspector.

Economic Prosperity and Place Directorate

Wyre Forest House

Finepoint Way

Kidderminster

Worcestershire DY11 7WF

Mike Parker, Corporate Director: Economic Prosperity and Place

The consultation period for the Local Plan Pre-Submission Publication (2018) document starts on **Thursday 1st November 2018**. All consultation material will be live on the Council's website (www.wyreforestdc.gov.uk/localplanreview) and available in libraries across the District from this date. Drop-in sessions will also be held during the consultation. Please see the Statement of Representation Procedure document, which accompanies this letter for more information.

Representations must be received by 5pm on Monday 17th December 2018 and should be made on a consultation response form. Response forms are available on the Council's website (www.wyreforestdc.gov.uk/localplanreview) and can be completed online using the consultation portal or emailed to LPR@wyreforestdc.gov.uk. Alternatively, hard copies are available from the Council's main reception at Wyre Forest House or from the Customer Service Centre (the Hub).

Any representation received will be considered alongside the Local Plan when it is submitted for Examination in Public. The purpose of the Examination is to consider whether the Local Plan complies with relevant legal requirements for producing Local Plans, including the Duty to Co-operate, and meets the national tests of 'soundness' for Local Plans (see below). Therefore, representations submitted at this stage must only be made on these grounds and, where relevant, be supported with evidence to demonstrate why these tests have not been met.

Legal compliance

To be legally compliant the Local Plan has to be prepared in accordance with the Duty to Co-operate and legal and procedural requirements, including the 2011 Localism Act and Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

Soundness

Soundness is explained in paragraph 35 of the National Planning Policy Framework (NPPF). The Planning Inspector conducting the Examination in Public has to be satisfied that the Local Plan is 'sound' – namely that it is:

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

To help you respond, guidance notes are included as part of the consultation response form and it is recommended that you read this note fully before responding. The guidance notes are available on the Council's website: www.wyreforestdc.gov.uk/localplanreview

At this stage, unless you indicate you wish to appear at the Examination to make a representation you will not have the right to do so. Any written representations made will be considered by the independent Planning Inspector.

All of the consultation and further evidence base documents published at previous rounds of consultation will also be available on the Council's website at www.wyreforestdc.gov.uk/localplanreview from 1st November 2018.

If you require any further information on the consultation please contact the Planning Policy Team on tel. 01562 732928.

I look forward to receiving your comments.

Yours faithfully

Helen Smith
Spatial Planning Manager

Enc. Statement of Representation Procedure

Wyre Forest District Council
Statement of Representations Procedure
and
Statement of the Fact that the proposed Submission Documents are Available for
Inspection and how they can be Inspected
Wyre Forest District Local Plan Development Plan Document
The Town and Country Planning (Local Planning) (England) Regulations 2012
Regulation 19 – Wyre Forest District Local Plan Pre-Submission Publication

Wyre Forest District Council (“the Council”) has produced the publication version of the Wyre Forest Local Plan Review and is proposing to submit this version of the Wyre Forest Local Plan to the Secretary of State. The Council is now publishing this version of the Wyre Forest Local Plan in accordance with Regulation 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012.

Title of Document: Wyre Forest District Local Plan Pre-Submission Publication

Subject Matter: The Wyre Forest Local Plan Pre-Submission Publication sets out how and where development will take place in the administrative area of Wyre Forest District (“the District”) and guides future planning decisions up to 2036. The Local Plan, when adopted, will form part of the development plan for the District.

Area Covered: Whole of the administrative area of the Wyre Forest District.

Publication Period: Thursday 1st November 2018 until 5pm on Monday 17th December 2018.

All representations on the document must be **received by the Council no later than 5pm on Monday 17th December 2018. Please note that late representations cannot be accepted.** This statement provides details on how to make representations.

Statement of fact – How to view the documents

During this public consultation period, copies of the Wyre Forest District Local Plan Pre-Submission Publication and other proposed submission documents listed below will be available to view on the Council’s website at www.wyreforestdc.gov.uk/localplanreview and will also be available for inspection at the following locations:

Council Offices:

- Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF
- Customer Service Centre (The Hub), Town Hall, Vicar Street, Kidderminster, DY10 1DB

Libraries:

- Kidderminster Library – Market Street, Kidderminster, DY10 1AB
- Stourport Library – Civic Centre, New Street, Stourport on Severn, DY13 8UN
- Bewdley Library – Dog Lane, Bewdley, DY12 2EF

Drop-in Sessions:

Copies of the documents will also be made available at the drop-in sessions being held throughout the district during the consultation period. The drop-in sessions are as follows:

Date	Time	Venue
Friday 16 th November 2018	3pm – 7pm	Cookley Village Hall
Saturday 17 th November 2018	10am – 2pm	Offmore Evangelical Church Hall, Kidderminster
Tuesday 20 th November 2018	5:30pm – 8pm	Heronswood Primary School, Spennells, Kidderminster
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Thursday 29 th November 2018	3pm – 7pm	Kidderminster Town Hall
Friday 30 th November 2018	3pm – 7pm	St Oswalds Church Centre, Broadwaters Drive, Kidderminster

Documents which are available to view:

- Wyre Forest District Local Plan Pre-Submission Publication Draft (October 2018)
- Wyre Forest District Local Plan Pre-Submission Publication Draft Policies Maps (October 2018)
- Sustainability Appraisal incorporating Strategic Environmental Assessment (October 2018)

There are also a considerable number of supporting documents and evidence base reports which underpin the Local Plan and these can be viewed on the consultation page at:

www.wyreforestdc.gov.uk/localplanreview

Representations:

Representations on the plan can be made throughout the consultation period but must be made before **5pm on Monday 17th December 2018**. Please note that late representations cannot be accepted. All representations should include your name and postal address.

To structure your response in the way the Planning Inspector will consider comments at the public examination, the consultation response form follows the same structure as the standard response form issued by the Planning Inspectorate. This is so consultation responses are set out in the way the Planning Inspector will consider comments at the public examination. The consultation response form will be made available on the Council's website: www.wyreforestdc.gov.uk/localplanreview

Due to recent changes in Data Protection Law, we will only accept responses submitted using the consultation response form.

The Council strongly encourages responses to be submitted using the on-line response form via the District Council's interactive consultation system; however, you can submit response forms in any of the following ways:

Online at: www.wyreforestdc.gov.uk/localplanreview

Via email to: LPR@wyreforestdc.gov.uk

Post to: Planning Policy Team, Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF.

Alternatively you can collect a response form from the main reception at Wyre Forest District Council, Wyre Forest House, Finepoint Way, Kidderminster, Worcestershire, DY11 7WF, or from the Customer Service Centre (The Hub), Town Hall, Vicar Street, Kidderminster, DY10 1DB.

All individual representations received will be submitted to the Secretary of State together with a summary of the main issues raised during the consultation period and considered as part of a public examination by an independent Planning Inspector. Representations at this stage should only be made on the legal and procedural compliance and the soundness of the Wyre Forest District Local Plan Pre-Submission Publication Draft, and whether it is in conformity with the Duty to Co-operate. Please refer to the guidance on the consultation response form when preparing representations.

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

Request for Notification:

Representations at this stage may be accompanied by a request to be notified about:

- The submission of the local plan for independent examination;
- The publication of the recommendations of the inspector appointed to carry out the independent examination; and
- The adoption of the Local Plan.

For further details, please visit the consultation webpages at:

www.wyreforestdc.gov.uk/localplanreview

If you have any questions about the plan which are not covered by this statement of representations or the material published on the Council's website or available at the Council's offices, please contact the Planning Policy Team on email: planning.policy@wyreforestdc.gov.uk



Helen Smith
Spatial Planning Manager

tel: 01562 732928

email: planning.policy@wyreforestdc.gov.uk

my ref:

your ref:

date: 1st November 2018

Dear Sir/Madam,

Wyre Forest District Local Plan Review
Pre-Submission Publication Consultation

Wyre Forest District Council is now proceeding with the next stage of its Local Plan Review with the Pre-Submission Publication consultation, which runs from 1st November until 5pm on 17th December 2018.

The Local Plan Pre-Submission Publication document and the accompanying documentation is now available to view and download from our website at:

www.wyreforestdc.gov.uk/localplanreview

Officers will also be available to discuss the Pre-Submission Publication consultation at a series of drop in sessions which Councillors would be welcome to attend. The dates and times of these are included in the attached consultation poster for information. We would be grateful if you could display this consultation poster on the Town Council's notice board.

If you would like to discuss the Local Plan Review in more detail then please contact the Planning Policy Team on email planning.policy@wyreforestdc.gov.uk or tel: 01562 732928. We look forward to receiving [your views and comments.](#)

Yours faithfully,

Helen Smith
Spatial Planning Manager

Economic Prosperity and Place Directorate

Wyre Forest House
Finepoint Way
Kidderminster
Worcestershire
DY11 7WF



Helen Smith
Spatial Planning Manager

tel: 01562 732928

email: planning.policy@wyreforestdc.gov.uk

my ref:

your ref:

date: 1st November 2018

Dear Sir/Madam,

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Pre-Submission Publication Consultation

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If you would like to discuss the Local Plan Review in more detail then please contact the Planning Policy Team on email planning.policy@wyreforestdc.gov.uk or tel: 01562 732928. We look forward to receiving your views and comments.

Yours faithfully,

Helen Smith
Spatial Planning Manager

Economic Prosperity and Place Directorate

Wyre Forest House
Finepoint Way
Kidderminster
Worcestershire
DY11 7WF



Local Plan 2016-2036

Pre-submission consultation

We are planning for this generation and the next with our Local Plan 2016-2036

It identifies where development sites for homes and businesses will be and the services and infrastructure needed to support them. This is your last chance to have your say before the Local Plan is submitted to the government's Planning Inspectorate to be examined.

Find out more

Visit our website

www.wyreforestdc.gov.uk/localplanreview

Come along to one of our drop-in sessions:



Date	Location	Time
Friday 16 November	Cookley Village Hall	3pm – 7pm
Saturday 17 November	Offmore Evangelical Church Hall, Kidderminster	10am – 2pm
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Friday 23 November	Areley Kings Village Hall, Stourport	3pm – 7pm
Saturday 24 November	Stourport Civic Hall	10am – 2pm
Tuesday 27 November	St George's Hall, Bewdley	3pm – 7pm
Thursday 29 November	Kidderminster Town Hall	3pm – 7pm
Friday 30 November	St Oswald's Church Centre, Kidderminster	3pm – 7pm

How to comment

Comment online at www.wyreforestdc.gov.uk/localplanreview or pick up a Consultation Response Form from our customer service centre at Kidderminster Town Hall or Wyre Forest House, Finepoint Way, Kidderminster.

Deadline for comments:
5pm, Monday
17 December
2018

Comments must be submitted using the Council's Local Plan Consultation Response Form



Wyre Forest
District Council

Wyre Forest District Local Plan Pre-Submission Publication

Consultation Plan

1.0 Background

- 1.1 It is a cornerstone of the planning system that communities and stakeholders should be able to influence the matters addressed in planning policy. The National Planning Policy Framework (NPPF) published in July 2018 reinforces the importance of community involvement in paragraph 15: *“The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.”* In accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Wyre Forest District Local Plan Pre-Submission Publication document has been published to allow representations to be made before it is submitted to the Secretary of State. Consultation on the Local Plan Pre-Submission Publication document (known as the Publication document) will run from 1st November to 17th December 2018. All representations received will be submitted with the draft Local Plan to the Secretary of State for examination in public.
- 1.2 At this publication stage, the full Sustainability Appraisal report is also available for consultation. This report includes a non-technical summary setting out the key stages in the Sustainability Appraisal process and the main findings.

2.0 What is the Local Plan Review?

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

3.0 Adopted Statement of Community Involvement Requirements

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

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

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

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

4.0 The Duty to Cooperate

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

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

5.0 Targeting Consultation and Methods

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

5.2 It is proposed to consult in a variety of ways. Examples include drop-in sessions in Kidderminster, Stourport-on-Severn, Bewdley and in other areas, mini poster displays in a wide range of accessible locations throughout Wyre Forest District, a press release to be circulated to the local newspapers and radio stations as well as a leaflet distribution to householders within the District. All Town and Parish Councils will be sent a consultation notice and be asked to display it on their notice boards.

6.0 Involving Harder-to-reach Groups

6.1 Within the District there are groups which are hard to reach through consultations. The District Council recognises that these groups in particular may have different levels of access to information and therefore may find it harder to get involved in the decision making process. In particular, the District Council will employ the following methods for engaging hard to reach groups: leaflet distribution to households within Wyre Forest District, drop-in sessions at public locations (detailed at 6.2).

7.0 Drop-in Sessions

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

7.2 Drop-in Sessions

Date	Time	Venue
Friday 16 th November 2018	3pm – 7pm	Cookley Village Hall
Saturday 17 th November 2018	10am – 2pm	Offmore Evangelical Church Hall, Kidderminster
Tuesday 20 th November 2018	5:30pm – 8pm	Heronwood Primary School, Spennells, Kidderminster
Friday 23 rd November 2018	3pm – 7pm	Areley Kings Village Hall
Saturday 24 th November 2018	10am – 2pm	Stourport Civic Hall
Tuesday 27 th November 2018	3pm – 7pm	St Georges Hall, Bewdley
Thursday 29 th November 2018	3pm – 7pm	Kidderminster Town Hall
Friday 30 th November 2018	3pm – 7pm	St Oswalds Church Centre, Broadwaters Drive, Kidderminster

7.3 **Poster Displays**

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

- Kidderminster Library
- Stourport Library
- Bewdley Library

KIDDERMINSTER

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

STOURPORT

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

BEWDLEY

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

RURAL AREAS

- Wyre Forest Discovery Centre
- Cookley – Tesco and/or Post Office
- Blakedown Post Office
- Chaddesley Corbett Post Office
- Wolverley Stores
- Fairfield Shop
- Upper Arley Post Office
- Rowberry Farm Shop
- Far Forest Post Office/stores
- Colliers Farm Shop and/or Clows Top Post Office

8.0 Awareness raising – Media

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

9.0 Publishing on the Web

9.1 An interactive version of the Pre-Submission Publication document will be made available to enable electronic representations to be made. The interactive consultation response form can be filled in via the On-line portal or downloaded and emailed to LPR@wyreforestdc.gov.uk. The Council strongly encourages responses to be submitted using the on-line response form via the Council's interactive consultation system. (See section 9 below for full details on how to comment).

9.2 The evidence base documents will also be made available on the Council's website and copies will also be made available at the consultation drop-in sessions (see 6.2 for venues).

9.3 The District Council will also use social media (Twitter and Facebook) to promote the consultation period and the drop-in sessions.

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

10.1 The seven week consultation of the Pre-Submission Publication will start on Thursday 1st November 2018 and will close promptly at 5pm Monday 17th December 2018. **No late responses will be accepted.**

10.2 The consultation response form follows the same structure as the standard response form issued by the Planning Inspectorate. This is so consultation responses are set out in the way the Planning Inspector will consider comments at the public examination. The consultation response form will be made available on the Council's website: www.wyreforestdc.gov.uk/localplanreview. **We will only accept responses submitted using the consultation response form.**

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

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

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

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

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

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

11.0 Formally Processing Comments – Procedures

11.1 All consultation response forms submitted to the District Council online, by email or post will be acknowledged within five working days of their receipt. After the Pre-Submission Publication consultation period ends, the Planning Policy Team will consider all of the consultation response forms received during the consultation period and may, as a result, update the Submission version of the Local Plan. A consultation summary report will also be produced detailing the key issues raised from the consultation response forms received. This will be presented to and considered by the Overview and Scrutiny Committee and Cabinet. The consultation summary report will be made available for public viewing on the Council’s website.

11.2 The Council will then submit the Submission version of the Local Plan for examination by an independent Government appointed Planning Inspector. The Submission version will be approved by a meeting of the full Council which is expected to happen in July 2019. Consultation response forms received for this Local Plan Pre-Submission Publication document and the updated evidence base studies will be passed to the Planning Inspector. It should be noted that only those who make a representation seeking a change to the plan within the advertised publication consultation period will have the right to appear at the Examination.

11.3 The Council anticipates that an examination in public will be held on the Local Plan in late 2019 with adoption of the Local Plan taking place in 2020. However, the timetable after submission is beyond the Council’s control and will be in the hands of the Government appointed Planning Inspector.

Appendix A – List of Consultees

Specific Consultees

Wyre Forest District Parish/Town Councils

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

Adjacent Parish Councils

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

Other Specific Consultees

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

Appendix A – List of Consultees

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

General Consultees

Organisations and individuals registered in the Planning Policy database including:

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

Appendix A – List of Consultees

Service Providers

Hard to Reach Groups

Age UK Wyre Forest

Derbyshire Gypsy Liaison Group

Friends Families and Travellers

National Federation of Gypsy Liaison Groups

Offmore Comberton Action Group

The Showman's Guild of Great Britain Midland Section

Statutory and Specific Consultees

Birmingham City Council
British Telecom
Bromsgrove District Council
Centro- WMPTA
Dudley Metropolitan Borough Council
EE
Environment Agency
Greater Birmingham and Solihull Local Enterprise Partnership
Hereford & Worcester Ambulance Service
Hereford & Worcester Fire & Rescue Service
Highways England
Historic England
Homes England
Malvern District Council
National Grid
Natural England
Network Rail
NHS England
Office of Rail Regulation
Oil and Pipelines Agency (The)
Redditch Borough Council
Sandwell Council
Severn Trent Water Ltd
Shropshire Council
Solihull Council
South Staffordshire District Council
South Staffordshire Water Plc
Sport England
Staffordshire County Council
Staffordshire Police and Crime Commissioner
The Coal Authority
Three
Vodafone and O2
Walsall Council
West Mercia Police
West Midlands Ambulance Service
Western Power Distribution
Wolverhampton City Council
Worcester City Council
Worcestershire Acute NHS Trust
Worcestershire Clinical Commissioning Groupss
Worcestershire County Council
Worcestershire Local Enterprise Partnership
Worcestershire Regulatory Services
Wychavon District Council

Wyre Forest District Parish/Town Councils

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Chaddesley Corbett Parish Council
Churchill and Blakedown Parish Council
Kidderminster Foreign Parish Council
Kidderminster Town Council
Rock Parish Council
Rushock Parish Council
Stone Parish Council
Stourport on Severn Town Council
Upper Arley Parish Council
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Astley & Dunley Parish Council
Bayton Parish Council
Belbroughton and Fairfield Parish
Council
Clent Parish Council
Cleobury Mortimer Parish Council
Dodford with Grafton Parish Council
Elmbridge Parish Council
Elmley Lovett Parish Council
Hagley Parish Council
Hartlebury Parish Council
Highley Parish Council
Kinlet Parish Council
Kinver Parish Council
Lindridge Parish Council
Mamble Parish Council
Pensax Parish Council
Shrawley Parish Council
Upton Warren Parish Council