



**Wyre Forest District Local Plan
Pre-Submission Publication
2018**

OFFICE USE ONLY:
Representor number:
Representation number:
Plan reference:
Tests of soundness:

Consultation Response Form

1st November – 17th December 2018

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)

Personal Details		Agent's Details (if applicable)
Title	Mrs	
First Name	Elsie	
Last Name	Whitehouse	
Organisation	Kidderminster Foreign Parish Council	
Job title	Clerk and RFO	
Address – line 1	Lark Rise	
Address – line 2	Romsley Lane	
Address – line 3	Shatterford	
Address – line 4	Bewdley	
Address – line 5	Worcestershire	
Postcode	DY12 1RT	
E-mail Address	clerk.kiddfor.pc@googlemail.com	
Telephone Number	01299 861026	

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

KIDDERMINSTER FOREIGN PARISH COUNCIL

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

Paragraph

Policy

Other:

(e.g. Policies map, table,
figure, key diagram)

WA/KF/3

4. Do you consider the Local Plan is:

- | | |
|--|--|
| 4.1 Legally Compliant | No <input checked="" type="checkbox"/> |
| 4.2 Sound | No <input checked="" type="checkbox"/> |
| 4.3 Complies with the Duty to co-operate | No <input checked="" type="checkbox"/> |

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

- | | |
|---------------------------------|--|
| Positively Prepared | No <input checked="" type="checkbox"/> |
| Justified | No <input checked="" type="checkbox"/> |
| Effective | <input type="checkbox"/> |
| Consistent with National Policy | No <input checked="" type="checkbox"/> |

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.

Legally Compliant / Positively Prepared - we would challenge this on these grounds:

- a) Echoing comments made by councillors in other parts of the District, the Parish Council contend that the District Council have 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 free deliveries of this in the parish), nor in this rural parish of Kidderminster Foreign do they have good access to the internet, if at all. Leaflets (A5 Glossy leaflets) we were advised would be posted out to parishioners. These did not arrive. 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? We would challenge therefore 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.
- b) The documentation states that the Review has been “informed by agreements with other authorities” Which authorities? How can this statement be truthfully claimed? Certainly, we, Kidderminster Foreign as the local parish authority (the first tier of local government) have neither been consulted nor have we given any agreement to a development such as proposed under WA/KF/3 for the Land at Low Habberley which is within the parish boundary of Kidderminster Foreign. There has been no consultation or agreement with our Parish Council about this proposed development.

Justified - we would challenge this on these grounds:

- a) We 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 we understand the need for affordable housing as starter homes for young couples, we feel that there are other more appropriate sites within the district (particular brown belt sites, and the town centres) where we feel that there are opportunities which could provide sufficient and more suitable housing to meet the Government stipulation with careful and inventive planning.
- b) 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.
- c) In Wyre Forest District Council’s Pre Submission document (Oct 2018) it states on page 224 under “Reasoned Justification” 30.51 for inclusion of land for development that “This site is well contained by solid boundaries on three sides”. However, in Wyre Forest Local Plan Issues and Options Paper (Sept. 2015) on Page 27 under **environmental constraints** point 6.12 it says that the area falls within the West Midlands Green Belt, and is therefore subject to Green Belt Policy which **“restricts development except for very special**

circumstances”. We do not believe that having a boundary on three sides is a **“very special circumstance”**. Also, the open boundary side of the development proposed invites further sprawl towards the small village of Low Habberley, encouraging a serious erosion of the green belt buffer zone between the urban town of Kidderminster, and the small rural village of Low Habberley. This green belt buffer zone must be maintained at whatever cost to maintain the integrity and individuality of this small village from being swallowed by the town.

- d) The Local Plan Review seems to have total disregard for maintaining the integrity of the Green Belt, and does not give any importance or weight to the five purposes of Green Belt as specified:
- Check unrestricted sprawl of large built up areas
 - Prevent neighbouring towns (*or indeed villages*) merging into one another
 - Assist in safeguarding the countryside from encroachment
 - Preserve the setting special character of historic towns
 - Assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The plan to develop on site WA/KF/3 does not comply with at least 3 (possibly 4) of these five purposes, and indeed in the Local Plan Preferred Options Sustainability Appraisal of May 2017, the District Council comment that development of this *site* **“would have a significant negative impact on the integrity of the Green Belt and would not positively address any of the 5 purposes of the Green Belt”** and furthermore the District comments in the same document that although close to an existing road network **“a development of this site in this location would have a significant negative impact on the surrounding road network”**. How can opinion have changed so much in just a few months?

- e) We would 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. Planners need to place developments which have easy access to take commuting traffic easily away from the town, not make it worse, and be close to major highway networks; this point should be given a high priority to avoid expensive capital outlay on highway improvements on the wrong side of the town, away from main highways, in this rural area.
- f) The Parish Council of Kidderminster Foreign 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. It is in the national interest therefore 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.

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.

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.

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

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 : Elsie Whitehouse. Clerk and RFO to Kidderminster Foreign Parish Council.

Date 16/12/18

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

Email: **LPR@wyreforestdc.gov.uk**

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

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