

Wyre Forest District Council

KIDDERMINSTER CENTRAL AREA ACTION PLAN DEVELOPMENT PLAN DOCUMENT

FINAL SUSTAINABILITY APPRAISAL REPORT NON TECHNICAL SUMMARY JULY 2012



Wyre Forest District Council

LOCAL DEVELOPMENT FRAMEWORK

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Wyre Forest District Council



Kidderminster Central Area Action Plan - Final Sustainability Appraisal Report - Non-Technical Summary (July 2012)

1 This non-technical summary of the Sustainability Appraisal (SA) report should be viewed alongside the full SA and the Kidderminster Central Area Action Plan (KCAAP) Development Plan Document (DPD). The SA forms part of the evidence base and justification for the policies within the DPD. It has been an ongoing process which has evaluated and informed the identification of options, decisions around how these options were taken forward and development of the policies within the publication draft. This report aims to provide information which will support evaluation of the Kidderminster Central Area Action Plan DPD by stakeholders and members of the public and assist in the provision of feedback on the DPD. The District Council also welcomes any comments on the SA report itself.

2 SA is a process which enables Local Planning Authorities (LPAs) to assess how their plans and proposals help to achieve the Government's Sustainable Development objectives. The purpose of SA is to ensure that all DPDs and Supplementary Planning Documents (SPDs) conform to the Government's guiding principles of Sustainable Development. These are as follows:

- Living within Environmental Limits
- Ensuring a Strong, Healthy and Just Society
- Achieving a Sustainable Economy
- Promoting Good Governance
- Using Sound Science Responsibly

3 A quick reference guide to SA is available on the District Council's Forward Planning website at www.wyreforestdc.gov.uk. There are three key stages to preparing a SA:

- The production of a Scoping Report
- The production of a Sustainability Appraisal
- The production of an Adoption Statement

4 A Scoping Report was published for a six-week consultation between 30th April and 6th June 2008. The document reviewed relevant national, regional and local policies and present detailed baseline data on the current economic, social and environmental state of the District. The representations received during the consultation period were incorporated into the Revised SA Scoping Report published in January 2009. A table setting out the representations received and how they have been considered is available on the District Council's website.

5 The Scoping Report put forward an SA framework including objectives, decision-making criteria and monitoring indicators. The framework is based on the Core Strategy SA framework and was developed through joint working with Worcestershire County Council and its other District Councils.

6 The Final SA Report assesses the policy options and sites put forward at Issues and Options stage and any further alternative policy options and sites which were suggested as part of the Issues and Options consultation. The report also assesses the options set out within the Preferred Options paper against the SA framework. The indicators will be finalised as the DPD develops and will be used to monitor the the effects of the DPD once it is adopted. Monitoring information

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will be reported through the Annual Monitoring Report. This Final SA Report tests any additional changes to the Publication document and takes into account representations made on the draft report.

Structure of the SA Report

7 Section Three provides an Introduction to the SA Report by outlining the purpose of the SA and the background to it, including definitions of sustainable development and sustainability requirements within planning policy.

8 Section Four sets out the appraisal methodology followed by the District Council in undertaking SA as part of the preparation of Kidderminster Central Area Action Plan DPD.

9 Section Five reviews all relevant plans, programmes and sustainability objectives at the international, national, regional and local levels that have been taken into account in developing the Core Strategy. It also sets out the environmental, social and economic baseline for Wyre Forest District, highlighting the key social, economic and environmental characteristics and trends likely to be affected by the LDF. This provides the the basis for identifying sustainability issues/ problems and for predicting and monitoring effects. From this review of evidence, the key sustainability issues and problems facing the District are identified. The section also sets out the SA framework for Wyre Forest District as the basis for predicting and monitoring the social, economic and environmental effects of all local development documents making up the emerging LDF. This framework consists of 21 SA objectives, each of which is supported by a number of decision-making criteria and indicators. Targets are set for each of the indicators to assist with monitoring.

10 Section Six sets out the results of testing the KCAAP DPD site and policy options against the SA framework. It identifies those options which have been rejected and the reasons for this.

11 Section Seven sets out the results of the testing of the plan policies and sites against the SA framework. It identifies the reasons for selecting the sites and policies which were taken forward. It considers the secondary, cumulative and synergistic effects of the policies within the plan and looks at the effect of the plan in combination with other plans, policies and programmes. The section also looks at proposed mitigation measures which could be incorporated into the policies within the DPD and sets out an overview of the uncertainties and risks associated with the SA process.

12 Section Eight covers the links to other plans, policies and programmes at the project level and sets out the proposals for monitoring.

Summary of the Baseline

13 A summary of the social, economic and environmental baseline characteristics of the Wyre Forest District is set out below.

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Economic:

- Unemployment in the District is higher than the county average, but lower than regional and national levels; however there are pockets in Kidderminster where unemployment is much higher.
- Tourism and manufacturing are important parts of the economy; however, manufacturing has been in continual decline.
- Educational attainment is below the regional and county average.

Social:

- The District has an ageing population and an increasing number of residents are aged 80 years and over.
- Ethnic minorities are significantly under represented compared to regional and national figures.
- Crime in the District is below the national average - although crime is highest in the Greenhill ward which covers Kidderminster town centre.
- House prices are lower than the county and regional average.

Environmental:

- The River Stour is a Special Wildlife Site and the river and Staffordshire & Worcestershire Canal form important green infrastructure and biodiversity corridors.
- Kidderminster has 4 designated conservation areas and many Statutory and Locally listed buildings.
- The River Stour presents a significant flood risk to parts Kidderminster.
- Kidderminster has an Air Quality Management Area (AQMA) which covers the area along St. Mary's ring road and into the Horsefair.

Puxton Marsh SSSI, Kidderminster



The SA Framework

14 The SA scoping report and subsequent consultation identified a range of significant sustainability issues for Wyre Forest District, based on a review of relevant policies, programmes and objectives and a survey of baseline data. These are summarised below:

Table 1 Summary of Baseline Information

| Social | Economic | Environmental |
|--|---|---|
| <ul style="list-style-type: none"> • Marked variation in the provision of community | <ul style="list-style-type: none"> • A high concentration of fuel poverty within the District, | <ul style="list-style-type: none"> • Need to control the further development of caravan sites in the District and restrict occupancy of existing caravans. |

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| Social | Economic | Environmental |
|--|---|---|
| <ul style="list-style-type: none"> facilities between the District's urban wards. A decline in rural services, particularly to the west of the District. Importance of safeguarding the District's Local Centres in order to serve their resident populations. Poor access to play facilities in some urban and rural wards. Variation in levels of health between the District's wards. Need to bring empty homes within the District back into use. The need to reduce crime within the District. The need to reduce drug and alcohol misuse within the District. Need to retain and enhance short stay parking facilities within the town centres. | <ul style="list-style-type: none"> particularly in the most deprived ward. Lack of affordable housing choice across the District. Noticeably higher unemployment forming a corridor between Kidderminster and Stourport-on-Severn. Significant levels of congestion in some areas of the District, specifically Bridge Street, Stourport-on-Severn and the Stourport Road. Could have a detrimental impact on businesses locating within the Stourport Road area. | <ul style="list-style-type: none"> Need to control the further development of existing chalets within the District and their replacement with permanent dwellings. Need to reduce noise pollution complaints in the District. The need to improve the condition of SSSI habitats, particularly marshland and heathland areas. The need to conserve and enhance the rich variety of habitat types within the District. The need to protect the variety of protected species from adverse development. Significant residential and urban areas are at risk from flooding. Declining air quality within the urban areas of the District. To safeguard and enhance the distinctive historic environment of the District. The need to conserve the District's rural landscape from inappropriate development. Need to increase the generation and use of renewable energy within the District. Need to improve energy efficiency in new and existing housing stock. Need to reduce CO₂ emissions within the District. Need to adapt to the present and future changes in climate that the District is experiencing. Need to conserve water resources and use them in a sustainable way. Need to reduce the total volume of waste produced and increase recycling. Need to focus new development on brownfield sites to preserve greenfield land and reduce the need to travel. Need to develop at densities greater than 30 dph in order to reduce the need to travel and preserve greenfield land. Impact of the Wyre Forest Schools Review on access to educational facilities and impact on travel patterns/increased journey times. Rapidly increasing growth in rail usage at both the District's rail interchanges. Need to provide safe cycle route networks to increase cycling levels within the District. Importance of safeguarding and enhancing the bus priority route network and the need to enhance public transport infrastructure. |

15 This analysis led to the development of sustainability objectives, which will form the SA framework. These are:

- To improve the health and well-being of the population and reduce inequalities in health.
- To improve the quality of and accessibility to, cultural services and local services and facilities.
- To provide decent, affordable housing for all, of the right quality and type, tenure and affordability for local needs in a clean, safe and pleasant local environment.

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- To enhance the quality of life for all residents within the District.
- To encourage pride and social responsibility in the local community and reduce crime.
- To manage waste in accordance with the waste hierarchy: reduce, reuse, recycling and composting, recovery, disposal.
- Reduce contributions to climate change and promote energy efficiency and energy generated from renewable and low-carbon sources.
- To reduce the need to travel and move towards more sustainable travel modes.
- Protect the use of water, soil and air, whilst maintaining or improving their quality.
- Ensure development does not occur in high-risk flood prone areas and does not adversely contribute to fluvial flood risks or contribute to surface water flooding in all other areas.
- Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening local distinctiveness and sense of place.
- To conserve and enhance the District's biodiversity and geodiversity.
- Conserve and enhance the historic and built environment through considerate siting and design and through respecting architectural, cultural and archaeological heritage.
- Ensure efficient use of land through the safeguarding of mineral reserves, the best and most versatile agricultural land and greenfield land; and maximise the use of previously developed land.
- To promote the regeneration of Kidderminster and Stourport-on-Severn.
- Mitigate against the unavoidable negative impacts of climate change.
- Reduce noise and light pollution.
- To raise the skills levels and qualifications of the workforce.
- To consult communities in accordance with the SCI, providing opportunities to participate in and contribute to the decisions that affect their neighbourhood and quality of life.
- Create and maintain a diverse, knowledge-driven economy, ensuring all have the benefits, urban and rural.
- Promote and support the development of new technologies, of high value and low impact, especially resource efficient technologies and environmental technology initiatives.

Sustainable Transport Infrastructure, Kidderminster



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Summary of the Objectives of the Kidderminster Central Area Action Plan DPD

16 The Kidderminster Central Area Action Plan DPD will, through the formulation of site specific allocations and policies, allocate and designate areas of land within the town for particular uses including housing, retail, offices and leisure. The KCAAP will go beyond the traditional role of land use planning and will include other key areas of economic, environmental and social activity. It will also set out clear mechanisms to ensure that the plan is delivered.

17 The broad objectives of the KCAAP are:

- To maximise the economic potential of the town centre including shopping, the evening and visitor economy, and office space.
- To realise the potential of the area's canalside setting.
- To open up the River Stour to enhance its biodiversity potential and environmental setting.
- To improve the environment by enhancing streets and spaces for people.
- To connect and integrate the main developments and environmental assets.
- To provide a framework for proactive town centre management.

How the SA Informed Development of Policies

18 The SA was undertaken by District Council officers and was an integral process of developing the policies and selecting the sites set out within the DPD. All of the policy and site options were tested against the SA framework and the baseline data, as well as information on likely changes set out within technical reports, was used to predict the effects. The process was limited by some uncertainties including a lack of baseline data in some areas, limited understanding of some of the effects and uncertainty where options could either lead to a positive or a negative effect depending on how they are implemented or how people react to them.

19 The SA, alongside wider sustainability considerations, played an important role in the evaluation of and decision-making around the options as well as refining those options into detailed policies. This included:

- Location of development - An analysis of the sustainability impacts of the various sites put forward. The Adopted Core Strategy directs development towards Kidderminster and Stourport-on-Severn, however, a large number of sites were assessed and ranked based on their sustainability implications. The final sites selected are mainly those which accord with the Adopted Core Strategy and score highly against the SA framework, however, a small number of sites which did not score so well mainly because of accessibility and car dependency issues have been allocated to deliver rural affordable housing. The sites selected generally promote non-car access to services and facilities.
- The SA supported giving priority to environmental concerns and ensuring that the site specific policies identified specific mitigation measures in response to many of the issues highlighted by the SA process. One of the key issues for Wyre Forest District is balancing the brownfield strategy with the need to deliver affordable housing and renewable energy. There will need to be some compromise on some sites because of viability issues. However, the viability policy set out will ensure that affordable housing thresholds can be lowered where there is a robust viability assessment supporting this. The strategy prioritises

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brownfield sites to regenerate the urban area and reduce the need to travel. Had a greenfield strategy have been set out then higher levels of affordable housing could have been delivered however, this would have significant implications for car use and additional congestion.

- The SA identified some potential issues in relation to loss of employment land. As a result, some sites have been allocated for a mix of uses retaining an element of employment land on-site where appropriate. Some sites were identified through the Employment Land Review as being potentially suitable for switching to residential development. Overall, the policies and allocations retain a suitable portfolio of employment land whilst delivering the required level of housing.
- Flooding is significant within the District and whilst some sites identified a risk of flooding, these sites will require a Flood Risk Assessment and mitigation has been built into the policies in response to concerns raised by the SA. The allocations are also supported by a detailed sequential assessment. The District's three towns all have rivers flowing through them so town centre regeneration will always raise some concerns relating to flooding.
- Some of the sites raised concerns relating to nature conservation and biodiversity and where appropriate, clauses have been added into site specific policies to ensure no detrimental impact on neighbouring nature conservation sites. Additionally, a number of policies included clauses requiring the retention of significant trees. Some of the sites identified the potential to enhance the streetscene. The design policy set out within the Site Allocations and Policies DPD, together with clauses relating to design in specific policies where relevant will ensure that benefits are secured.

Main Effects of the Kidderminster Central Area Action Plan DPD

20 The SA process has revealed the predominantly positive impact of the KCAAP on the sustainability objectives. The generic policies contained within Part A of the DPD support and contribute towards the SA objectives and will help to deliver positive impacts for the town. The fact that the KCAAP covers a town centre location means that many of SA objectives are met due its good access to transport, services and facilities. The pro-growth nature of the DPD means that increased housing and employment opportunities should be delivered.

21 The allocation of specific sites will also provide a range of benefits and help to meet a key priority of the KCAAP which is to regenerate Kidderminster. The sites selected will help to further unlock the potential of the town including green infrastructure provision, increased access to the river and canal, improved vibrancy and natural surveillance, and increased accessibility.

Boucher Building, Green Street Conservation Area



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22 It is clear from the SA findings that a number of negative effects could occur as a result of the policy options chosen and the sites allocated. Housing and employment growth will inevitably lead to additional noise and light within the areas where growth occurs, particularly in sensitive locations adjacent to the river and canal which could have a further knock-on impact on biodiversity. In addition to this, many key sites lie within flood risk areas and care will need to be taken to safeguard future development against any negative impacts. Design issues will also need to be sensitively handled with new development, particularly as the area has many heritage assets including conservation areas and listed buildings.

23 Many of these impacts will be mitigated against and these mitigation measures have been included within the policies for specific sites as well as being the purpose of some of the criteria-based policies set out within Part A of the KCAAP. For example, Part A includes policies on the River Stour, Staffordshire and Worcestershire Canal and Green Infrastructure which look to safeguard against flood risk and enhance biodiversity and green infrastructure provision. A number of design-based policies are also in place to ensure that new development is of a high-quality and enhances the character of the area. In addition to this, the Site Allocations & Policies and Core Strategy DPDs provide further guidance on such matters as flood risk, historic environment, open space, community and education facilities that will further protect and mitigate against negative impacts.

24 Any negative impacts should be balanced against the positive effects, in particular, meeting housing need, delivering affordable housing, increasing employment and supporting the local economy.

Secondary, Cumulative and Synergistic Effects

25 A range of cumulative effects are predicted arising from the KCAAP, both from the cumulative impact of all developments proposed in the DPD and from impacts in combination with other plans and programmes of relevance to Wyre Forest District:

- **Resource Use.** There is a strong emphasis on economic and housing growth, which is likely to lead to increased resource use including energy, water and minerals. The extent to which this will be offset by measures within the Core Strategy and KCAAP and Site Allocations and Policies DPDs to reduce the pressure on resource use is uncertain.
- **Waste generation.** The growth and development envisaged in Wyre Forest is highly likely to lead to increased waste generation. Again, the Core Strategy, KCAAP and Site Allocations and Policies DPDs and the Waste Core Strategy will help to encourage waste minimisation, although the extent to which this will be able to offset the effects of growth is unclear.
- **Climate change.** The strong emphasis on housing and economic growth is likely to lead to increased greenhouse gas emissions. Other policies are in place to promote energy efficiency, renewable energy and sustainable transport and it may be that this will enable greenhouse gas emissions to be reduced, although this is not certain.
- **Road networks.** The planned housing and economic growth in the District are likely to lead to increased demand for transport. This could have adverse impacts on the road network, although a number of measures are planned to address this, including locating most developments in accessible locations, promotion of cycling and walking, and support

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for rail and bus improvements. It is uncertain whether or not the number of vehicles on the roads will increase significantly despite the mitigating actions.

- **Flooding.** Although a large number of the proposed sites have flood risk issues, the Core Strategy contains policy requiring mitigation for any developments in areas with known flooding issues, and therefore adverse effects are unlikely.
- **Air quality.** Economic and housing growth and road improvements may lead to increased road traffic, although measures to promote more sustainable transport and reduce the need to travel are likely to offset that increase. Air quality in the Horsefair and Welch Gate AQMAs is likely to improve.
- **Water quality.** The level of growth promoted by the Site Allocations and Policies and KCAAP DPDs will increase the demand for water supply and wastewater treatment. There are constraints for both supply and treatment, although capacity can be provided to meet the development needs of the District.
- **Population.** The communities within Wyre Forest District are likely to experience positive cumulative effects. The key benefits will result from the increase in employment opportunities provided, and improved residential and urban environments, good access to services and facilities and more use of sustainable transport.
- **Ecosystems.** There is potential for adverse cumulative impacts on priority species and habitats from the level of development proposed, both from recreational pressure and the cumulative impacts arising from disturbance.
- **Cultural heritage.** Significant cumulative effects on designated assets are unlikely, and development provides a number of opportunities to protect and enhance designated assets.

26 It is recommended that policy SAL.UP5 in the Site Allocations and Policies DPD be amended to explicitly require cumulative effects on species and habitats to be assessed in ecological surveys.

Effects of the Kidderminster Central Area Action Plan on other Plans, Policies and Programmes

27 The KCAAP is in compliance with the National Planning Policy Framework and compliments its objective for sustainable economic growth. The KCAAP also has a strong relationship with the other DPDs included with the Local Development Framework. In particular it will help to deliver the objectives and strategic guidance within the Adopted Core Strategy as well as implementing the Site Allocations and Policies DPD. A further key document is the Kidderminster Regeneration Prospectus which highlights key themes and action areas in the town. The KCAAP provides the statutory planning framework to help achieve the ambitions of the Prospectus and the ReWyre Initiative. The KCAAP is also strongly linked and complimentary to many of the County Council's guidance such as the Local Transport Plan 3.

Next Steps and Monitoring

28 The KCAAP will undergo a publication period giving people the opportunity to raise issues relating to its 'soundness'. The SA Report will also be made available for comment during this time. Following consultation on the pre-Submission Publication Version, the KCAAP will be submitted to the Secretary of State together with the SA Report as part of the evidence base

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for an independent Examination in Public. Following this process, the KCAAP will be adopted by the District Council if found 'sound'. Monitoring of the KCAAP will take place following its adoption and will be reported through the District Council's Annual Monitoring Report.

29 The following indicators are proposed for monitoring. These indicators are drawn from those set out within the SA framework. These indicators are also being used to monitor the sustainability impacts of the Core Strategy and as such, information should become available on these indicators as part of that process. These indicators will also be used to monitor the Site Allocations and Policies DPD. However, these indicators may need to be amended to reflect the availability of information.

- IMD health profiles
- Number of developments (applications approved) which benefit the green infrastructure network
- Life expectancy
- Adult participation in sport (NI8)
- % of new residential development within 30 minutes public transport travel time of key facilities.
- Loss of community facilities as a result of new development.
- % of villages with key facilities, i.e, primary school, post office, GP, pub, village hall, convenience store
- Number of affordable housing completions (net of demolitions)
- % of housing completions which are affordable (net of demolitions)
- % of housing completions by size (gross)
- % of housing completions by tenure (net of demolitions)
- Number of additional gypsy/traveller pitches granted permission
- Number of extra care units completed
- Number of residential applications refused as a result of poor quality design (applications refused using Policy D1 in Wyre Forest District Adopted Local Plan 2004)
- % of homes constructed to Code for Sustainable Homes level 4 or above
- NI3: Those who have participated in a local area
- Average number of neighbour and statutory consultation letters sent per planning application
- Number of new developments incorporating 'Secured by Design' principles (applications determined using policy D16 in the Wyre Forest District Adopted Local Plan, 2004)
- % of flatted residential and all commercial developments providing storage for recycling (permissions granted)
- Volume of household waste recycled (NI192)
- Household waste collected (excluding recycling)(tonnes)
- District per capita CO₂ emissions
- Number of major new developments incorporating on-site renewable energy generation
- Average energy rating of new housing
- % of residential completions within Kidderminster, Stourport-on-Severn and Bewdley
- Number of developments granted permission which provide cycle parking
- Number of developments granted permission which incorporate travel plans
- Number of AQMAs and areas of air quality concern within the District

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- % of new developments incorporating SUDS
- Number of new residential developments (permissions granted) where any part of the site is located in the floodplain (zone 2 and 3)
- Number of planning permissions granted contrary to EA advice
- Number of applications refused in Conservation Areas
- Number of planning permissions granted in Conservation Areas
- Number of Listed Building consents granted
- Number of new records added to the HER
- Number of applications approved contrary to Natural England recommendation
- Number of applications refused because of their potential impact on biodiversity/geodiversity.
- Condition of SSSIs
- Change in areas of local biodiversity importance
- Proportion of local sites where positive conservation management has been or is being implemented (NI197).
- Achievement of BAP targets
- Number of demolition consents (Listed Buildings)
- Number of demolition consents (Conservation Areas)
- Number of buildings on the national and local BARs
- % of Conservation Areas with Conservation Area Appraisals completed/updated within the last 5 years
- % of Conservation Areas with Management Plans completed/updated within the last 5 years.
- Number of derelict buildings brought back into use.
- Amount of best and most versatile agricultural land lost to development
- Number of planning permissions granted in the Green Belt
- Number of hectares of open space and recreational/amenity space lost to development
- % of new residential completions in Kidderminster and Stourport-on-Severn located on brownfield land
- Number of noise pollution complaints
- Number of light pollution complaints received
- % of school leavers with 5 A*-C grades
- % of the District's population qualified to NVQ level 4 or higher
- % of LDF consultations carried out in accordance with the SCI
- Number of consultation responses received on LDF documents
- Number of VAT registered businesses within the area
- Number of VAT registered businesses in rural areas
- Number of bed spaces developed (Hotels and Guest Houses)
- Number of tourism related jobs
- De-registrations of VAT registered businesses in the area
- New retail development within or on the edge of primary shopping area (Kidderminster and Stourport-on-Severn)
- Net new retail floorspace completed.
- % of employment land developed on brownfield land
- Number of B1 completions