



**Wyre Forest District**

**Site Allocations and Policies Plan**

**Examination**

**Matter 10: Green Belt**

**WFDC Response**

14<sup>th</sup> January 2013

**Matter 10 - Green Belt****1. Concerns are raised about the viability of development on the former Lea Castle Hospital site. Is the relevant section of Policy SAL.PDS1 sufficiently flexible to ensure that the re-development of the site is deliverable?**

1.1 The concerns with regard to the site's viability issues are noted and understood. However, the Viability Assessment was not made available to the District Council until the deadline for pre-submission publication representations had closed. Therefore, unfortunately due to circumstances beyond the Council's control, suitable evidence was not provided in time to inform a change in policy at the Pre-Submission Publication stage.

1.2 The District Council welcomes the Homes and Communities Agency's (HCA) recent commission for the preparation of a detailed viability assessment to look at redevelopment options for the site. The Council supports the sustainable redevelopment of the Lea Castle Hospital site within the plan period and recognises that the specific nature of the site means that issues of viability and deliverability will be of particular concern. The results of the viability assessment and market testing demonstrate that without an element of C3 enabling development then the delivery of the site during the plan period is highly unlikely. The Council acknowledges that the evidence has now been made available to support this.

1.3 The Local Housing Delivery Group's report "Viability Testing Local Plans" (June 2012), recognises that there are significant challenges for planning authorities seeking to make plan policies that both provide for acceptable development and avoid placing unrealistic pressures on the cost and deliverability of development. These challenges are exacerbated when market conditions reduce the scope for delivering plan policies through lack of development value.

1.4 Paragraph 89 of the NPPF (SD001) makes it clear that the partial or complete redevelopment of previously developed sites (brownfield land), which would not have a greater impact on the openness of the Green Belt than the existing development, is not inappropriate development in the Green Belt.

- 1.5 Within the context of the viability evidence the Council considers that an element of flexibility to allow for enabling C3 uses should be incorporated into Policy SAL.PDS1. Accordingly, the Council and the HCA have agreed proposed modifications to the Policy for the Inspector's consideration through the examination process. More detailed information relating to the discussions is set out in the Statement of Common Ground (SOCG4) and the specific related proposed modification SALMOD64.
- 1.6 It is considered that these proposed amendments to the policy would make it sufficiently flexible whilst remaining in conformity with national guidance and the District's Adopted Core Strategy (SD003) and address the HCA's concerns. Accordingly, it is the Council's view that the questions raised under this matter have been fully addressed through the proposed wording (as agreed with the HCA), arising from the Statement of Common Ground.