

**Wyre Forest District Site Allocations and  
Policies DPD  
Independent Examination**

**Green Belt Issues Technical Paper**

**October 2012**

## 1. Overview

- 1.1 This paper provides the background to the designation of the Green Belt within the Wyre Forest District and sets out details in relation to the saved Adopted Local Plan policies and the Adopted Core Strategy that directly relate to the Green Belt. It outlines the history and purpose behind the designation of Areas of Development Restraint (ADRs) and Major Developed Sites in the Green Belt within the District Local Plan.
- 1.2 It also sets out how the Green Belt provisions were considered in developing the Site Allocations and Policies DPD. In particular, how the changes to national planning policy brought about this year through the National Planning Policy Framework (NPPF) have necessitated a different approach to the designation of Previously Developed Sites in the Green Belt. It outlines details of those Previously Developed Sites that have been allocated within the Pre-submission DPD and the rationale for their selection.

## 2. Changes to National Planning Policy

- 2.1 Paragraphs 79-92 of the NPPF reaffirm the fundamental aims of Green Belt policy which remain largely unchanged from policies that were contained within PPG 2: Green Belts. However, the removal of reference to Major Developed Sites in the Green Belt under the terms of Annex C, PPG2 does have implications for Wyre Forest District. Paragraph 89 of the NPPF refers to:

*“Limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.”*

- 2.2 It is considered that this is the most appropriate national planning policy to apply to those areas that were previously identified as Major Developed Sites in the Green Belt.
- 2.3 The District Council has undertaken a NPPF Compatibility Self Assessment which included an assessment of the Green Belt policies in the plan and whether they accurately reflect NPPF Policy. The assessment asks whether policies:
  - Allow for the extension or alteration of a building rather than a dwelling
  - Include development brought forward under a Community Right to Build Order

Officers have proposed minor amendments to incorporate these subtle policy changes within the Green Belt policies of the Site Allocations and Policies DPD.

## 3. General Extent of the Green Belt within the District

- 3.1 Within Wyre Forest District, the extent of the Green Belt includes all the land as far west as the River Severn, but excludes the towns of Kidderminster, Stourport-on-Severn and Bewdley and the smaller settlements of Blakedown, Cookley and Fairfield. The precise boundaries of the Green Belt around Kidderminster, Stourport-on-Severn and Bewdley were determined in detail in 1989, upon the adoption of the Wyre Forest Urban Areas Local Plan.

- 3.2 In determining the Green Belt boundaries within the Wyre Forest Urban Areas Local Plan (1989), due regard was had to the longer term requirements of development. Land at Hurcott, Wilden and Worcester Road, Stourport-on-Severn was taken out of the Green Belt accordingly.
- 3.3 The previous Wyre Forest District Local Plan was adopted in May 1996. This made no changes to the established Green Belt boundary within the District, except in the rural areas where Green Belt boundaries were defined for the first time around the larger settlements of Blakedown, Cookley and Fairfield. These settlements are now excluded from the Green Belt.
- 3.4 The current Local Plan was adopted in 2004. This did not advocate any review of the Green Belt boundaries within the District as part of its review. Based on the availability of sites for housing and employment purposes it was not necessary to develop the Areas of Development Restraint or identify new Greenfield sites.

#### **4. Wyre Forest District Core Strategy – Development Strategy**

- 4.1 During the preparation and examination of the Core Strategy, extant guidance set out in PPG2: Green Belts stated that existing Green Belt boundaries should not be changed unless exceptional circumstances exist which necessitate such revision. During the development of the Core Strategy the need for a review of Green Belt boundaries was carefully considered. However, a review of the Green Belt within the District was not undertaken for a number of key reasons.
- 4.2 Firstly, the former emerging West Midlands Regional Spatial Strategy (WMRSS) guided the preparation of the Core Strategy. The principle elements of the development strategy for the West Midlands Region were to make the Major Urban Areas more attractive to retain an economically active population; to focus housing provision on named Settlements of Significant Development capable of balanced and sustainable growth and to provide for a spread of development to meet the requirements of other settlements, market towns and rural areas.
- 4.3 The WMRSS Panel Report specified that the District should accommodate the following levels of development during the period to 2026: 4,000 new dwellings and 44 hectares of employment land. Kidderminster was identified in the WMRSS as a Local Regeneration Area where the aim is to improve longer term economic prospects.
- 4.4 Secondly, the development of policy within the Core Strategy was informed by a robust evidence base. A Strategic Housing Land Availability Assessment (SHLAA) was undertaken to inform the Preferred Options and Publication versions of the Core Strategy. The SHLAA provides robust and up-to-date evidence and assessed all potential residential sites within the urban areas and villages, the Areas of Development Restraint (ADRs) and some smaller sites within the Green Belt with the potential for affordable housing exceptions schemes. The SHLAA indicated that all of the District's future housing requirements to 2026 can be met from brownfield sites. The District Council also commissioned consultants GVA Grimley to undertake a viability assessment of the potential residential sites within the SHLAA, which further assessed their deliverability.
- 4.5 An extensive 3 stage Employment Land Review was undertaken to inform the Preferred Options and Publication versions of the Core Strategy. This found that the

District had enough employment land of the appropriate type to be able to accommodate its employment needs to 2026. The strategy for future employment development is therefore to focus new employment on existing vacant and underused employment areas, which negates the need to consider further allocations on Greenfield land or within the Green Belt.

- 4.6 Moreover, at all stages of consultation on the Core Strategy, this proposed development strategy was supported. During the Issues and Options consultation a number of policy options were consulted on in relation to the strategic approach to growth within the District. These included:

SD)3 – Accommodate higher levels of housing growth through Greenfield Urban Sites or extensions including a review of the adopted Green Belt Boundary.

SD)4 – Accommodate a much larger number of dwellings by developing sustainable urban extensions, including Hoo Farm to the south of Kidderminster within well defined boundaries.

- 4.7 These options generated the highest level of negative response amongst consultees, which largely related to the integrity of the Green Belt. Whilst there were some calls for a selective review of the Green Belt boundary, the options did not receive general support at initial consultation stages and were considered to be contrary to emerging RSS Policy.
- 4.8 Sustainability Appraisal was also undertaken on these options. The Appraisal concluded that they would have a significant impact on the greenfield land resource within the District. In particular, the loss of best and most versatile agricultural land would be significant and could exacerbate flooding incidents through increasing surface water run off. There would be detrimental impacts on the landscape character of the area, particularly as large areas of the Green Belt to the east of the District are highly visible from the main road and rail transport corridors. Adverse impact on biodiversity and geodiversity within these areas could also be significant.
- 4.9 Sustainability Appraisal found that a more dispersed pattern of growth would be likely to encourage trip generation and access to services would be more difficult. Although these options, could help to deliver more affordable housing to meet local needs they would be the least beneficial towards town centre regeneration and the recycling of urban brownfield sites in sustainable locations. Significant infrastructure and mitigation measures would be required.
- 4.10 The Core Strategy does not advocate a Green Belt boundary review for the reasons set out above and therefore the ADRs will remain extant and are saved on the proposals map. Sustainability Appraisal work undertaken to inform the allocation of the ADRs identified them as the most sustainable locations to meet the District's long term development needs. The SHLAA considered the ADRs and their suitability in the long term for providing future housing developments, which could run beyond the plan period.

## **5. Allocation of Areas of Development Restraint (ADRs)**

- 5.1 Extant National Planning Policy at the time of the review of the current Local Plan (Paragraph 2.12 of Planning Policy Guidance Note (PPG) 2: Green Belts) specified

that in order to ensure the protection of Green Belts, this will in some cases mean safeguarding land between the urban area and the Green Belt which may be required to meet longer term development needs. Regional and strategic guidance should provide a strategic framework for considering this issue. In preparing and reviewing their development plans authorities should address the possible need to provide safeguarded land. They should consider the broad location of anticipated development beyond the plan period, its effects on urban areas contained by the Green Belt and on areas beyond it, and its implications for sustainable development. Paragraph 85, bullet points 3 and 4 of the NPPF reaffirm this approach.

- 5.2 The Worcestershire County Structure Plan was adopted in June 2001. It included Policy D.41 – Areas of Development Restraint (ADRs), which required District Planning Authorities to review the ADRs identified in their Local Plans against sustainability criteria. As part of the re-assessment of ADRs, District Councils should consider whether limited adjustments to Green Belt boundaries are necessary in order to identify new ADRs which meet the sustainability criteria in the Structure Plan for possible development needs beyond 2011.
- 5.3 Provision for ADRs was made for the first time in the Wyre Forest District Local Plan (Adopted in 1996). In order to satisfy the requirements of the 2001 Structure Plan Policy, the District Council undertook sustainability appraisal of the ADRs during the last Local Plan Review to inform its adoption in 2004. The Sustainability Appraisal concluded that the existing ADRs satisfied the sustainability criteria and represented potentially sustainable locations for development, if needed in the longer term.
- 5.4 Policy SAL.UP2 Areas of Development Restraint within the Site Allocations and Policies DPD identifies and safeguards the following “Areas of Development Restraint” in line with the provisions set out in the NPPF. These are also allocated with due regard to the fact that the Site Allocations and Policies and Kidderminster Central Area Action Plan have identified sites in sequentially preferable locations, that are considered to be available to meet the desired quantum of development indicated in the Adopted Core Strategy:
  - Land between the A451 and Hurcott Village, Kidderminster
  - Land off Hayes Road, Fairfield, Kidderminster
  - Land off Lowe Lane, Fairfield, Kidderminster
  - Land off Kimberlee Avenue, Cookley
  - Land off Wilden Top Road, Wilden, Stourport-on-Severn
  - Four Acres Caravan Park, Stourport-on-Severn

## **6. Saved Wyre Forest District Adopted Local Plan Policies**

- 6.1 The Wyre Forest District Adopted Local Plan contains a number of Green Belt policies, which have been saved pending replacement by appropriate policies within the appropriate Development Plan Documents (DPDs). These are as follows:
  - GB.1 Control of Development in the Green Belt
  - GB.2 Development in the Green Belt
  - GB.3 Outdoor Sport and Recreation
  - GB.4 Major Developed Sites in the Green Belt
  - GB.5 Re-Use of Existing Industrial Premises in the Green Belt
  - GB.6 Protection of Visual Amenity
  - DR.1 Areas of Development Restraint

6.2 The above listed policies were not replaced by policy set out within the Core Strategy and were saved until appropriate policy is developed and adopted through the Site Allocations and Policies DPD. It is therefore intended that they will be replaced through the following policies contained within the Pre-submission DPD:

- SAL.UP1: Green Belt
- SAL.PDS1: Previously Developed Sites in Green Belt
- SAL.UP11: Re-use and Adaptation of Rural Buildings
- SAL.UP2: Areas of Development Restraint

## **7. Saved Worcestershire County Structure Plan Policies**

7.1 The following relevant Worcestershire County Structure Plan Policies were saved beyond 2007:

- D.12 Housing in the Green Belt
- D.28 New Building for Business Purposes in the Green Belt
- D.39 Control of Development in the Green Belt
- D.40 Green Belt Boundary Definition
- T.8 Interchange Facilities in the Green Belt

7.2 Structure Plan Policy D.41 Areas of Development Restraint was not extended beyond 2007. The Secretary of State's reasoning for not saving this policy was as follows: *"ADRs seem to be an outmoded concept from a superseded PPG7. With the new advice in PPS1, PPS3 and PPS12 it seems no longer appropriate to continue with the concept of ADRs."*

## **8. Previously Developed Sites in the Green Belt**

8.1 The 2004 Adopted Local Plan identified two major developed sites (consistent at the time with guidance contained in Annex C, PPG 2), within the Green Belt under Saved Policy GB.4. The former Lea Castle Hospital site lies to the north east of Kidderminster, between the A449 Wolverhampton Road and the A451 Stourbridge Road. The site has been developed since the late 1950s and was used until recently by a variety of National Health Service uses. The gradual consolidation of these activities to other locations arising from changes to service delivery has led to the majority of the site becoming surplus to requirements. The site has therefore been identified as a major developed site under the provisions of PPG2 Annex C to allow the opportunity for well screened and sustainable redevelopment in the future.

8.2 The Rushock Trading Estate occupies a former military site within the Green Belt. It is accessed from the A442 Kidderminster-Droitwich Road. The application of the provisions of PPG2 Annex C to this Estate enables the currently permitted uses to continue, whilst creating flexibility within the planning policy framework to enable the re-use and redevelopment of sites within the curtilage.

8.3 The Pre-Submission Site Allocations and Policies DPD identifies a number of Previously Developed Sites in the Green Belt and sets out detailed site specific policies. The recognition of these sites for potential development is considered to be in line with the NPPF's focus on building a strong, competitive economy and the focus on local plans being pro-actively prepared to support an economy fit for the twenty first century. These are considered in turn below:

Rushock Trading Estate – has an approximate area of 14.5 hectares and is a former military site within the Green Belt. The estate is a thriving business area and is owned by Hovi Developments who have recently acquired the site and spent money refurbishing and upgrading the facilities within the estate boundaries. It is considered that by specifically identifying this site as a Previously Developed Site in the Green Belt the estate will benefit from the flexibility that the Planning Policy Framework provides and this will enable the re-use and redevelopment of sites within the curtilage to continue, subject to proposals being appropriate in terms of impact on the Green Belt.

Lea Castle Hospital Site – has an approximate area of 105 hectares and lies to the north east of Kidderminster. It contains a variety of buildings set out in an attractive landscape, well screened from the surrounding agricultural land by extensive tree belts. The developed element of the site is relatively small with the majority of land comprising significant areas of farmland. The site was developed from the 1950s onwards and was used for a number of years by a variety of National Health Service uses. When the Local Plan was adopted in 2004, only a small section of the site had become obsolete due to a consolidation of activities and was therefore identified as being suitable for redevelopment for a High Technology Business Park. However, this has failed to stimulate any interest and with the changes in the levels of ownership and occupation it is now considered that the whole of the site will need to be reviewed.

In early 2008 the Primary Care Trust (PCT) consulted on a number of options regarding the future use of the site. They later concluded that their preferred option was to relocate existing residents and close down operations. Therefore the large majority of the site is now currently vacant and subject to dereliction and vandalism. The Council is actively working with the site owners to consider its future redevelopment. The site has multiple ownerships but it is predominantly owned by the Homes and Communities Agency (89%), the remainder of the site is owned by the Primary Care Trust (8%) and the Department of Health (3%) with a small element being leased to Worcestershire County Council.

Recent consultation with regard to the future development of the site indicated a general level of support for a mixed use development, with suggestions such as a hospice, educational facility, leisure and residential uses being forwarded to the Council. This site is an attractive semi-rural location; however there are concerns about the viability of continuing the existing allocation of the site. As a consequence it is proposed that other options need to be explored through the Site Allocations process.

West Midlands Safari and Leisure Park – is one of the largest tourist attractions within the District. The Park is located entirely within the West Midlands Green Belt and is situated in a strategic gap between the two towns of Kidderminster and Bewdley. It is not only important locally but has regional and national attraction and provides a destination for visitors to the area. Due to the size and scale of the Park and its importance to the local economy it is felt important to specifically identify the site.

The predominant land use is open grassland, which despite the fences and ancillary animal houses maintains an openness of the Green Belt. However, there is a large part of the site that is considered to be Previously Developed and this is contained

primarily around the rides and leisure element of the park as well as the associated car parking.

Emerging policy outlines a positive approach for development within this area identifying that development proposals that support and enhance the park's operations as a leisure and tourism destination will be permitted.

## **9. Affordable Housing in Rural Areas**

- 9.1 Saved Local Plan Policy H.11 (**Affordable Housing in Rural Areas – Exception Schemes**) provides for the release of small sites which would otherwise not be allocated for housing development, within or adjoining existing villages. The release of such sites is dependent on the identification of a proven need for affordable homes arising from the locality and on securing suitable arrangements for the long term management of the scheme. Proposals must be supported by the Parish Council and must be considered with regard to the impact on the purposes of including land within the Green Belt.
- 9.2 Policy CP04: Providing Affordable Housing, within the Core Strategy replaces Adopted Local Plan Policy H.11. This encourages a proactive approach to the provision of affordable housing within the District's rural areas to be achieved through the site allocations process and through exceptions schemes on unallocated sites to meet identified local housing need.