



LAVIGNE LONSDALE

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22 Lemon St, Truro, Cornwall, TR1 2LS

t: 01872 273118

1st floor Stable Block, Newton St Loe, Bath BA2 9BR

t: 01225 421539

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## **Answers to Wyre Forest District Council Local Plan 2016-2036: Matters and Questions for the Examination (ED16)**

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**Representing Land Rear of Baldwin Road, Hurcott, Kidderminster: Barberry Hurcott Ltd.**

24<sup>th</sup> November 2020

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## 1.0 Matter 4.1 : Lea Castle Village

Matter 4.1 (i) – Is the site’s allocation for a new village and the proposed indicative quantity and mix of development justified by the evidence?

(ii) Is the allocation appropriate, compared with the reasonable alternatives.

### 1.1 Green Belt Review Evidence – Lack of Cumulative Assessment

With respect to Lea Castles impact upon the Green Belt, the assessment and evidence has been fudged.

We do not consider there is overwhelming evidence to justify an expanded allocation for Lea Castle over and above the proposed extension to Kidderminster East on Land to the Rear of Baldwin Road.

We do not consider that the site assessments were undertaken consistently or transparently, nor the process for selection.

Lea Castle Village in its entirety comprises 5 separate parcels of land - the existing former hospital site and three surrounding land parcels. These are for reference:

- WFR/WC/15 – Lea Castle Hospital (46.47ha housing)
- WFR/WC/15 – Lea Castle Hospital (1.96ha employment)
- WFR/WC/32 – Land Northwest of A451 Stourbridge Road
- WFR/WC/33- Land West of Lea Castle Hospital
- WFR/WC/34-Land North of Lea Castle Hospital

Other than the former hospital site (WC/15 housing and employment), which is heavily screened by existing mature tree cover the remaining three sites are all open and exposed.

These land parcels have only been assessed individually in terms of their effect on the Green Belt, in the 2017 and 2018 GB Reviews. Both reports have shown that other than the enclosed Lea Castle Hospital site, the other three parcels have most significant and damaging effects on the green belt. There has been no assessment of the cumulative effects of all five parcels on the green belt.

The latest Green Belt Topic Paper, released in October 2020, had an ideal opportunity to address this huge omission, but this fails too.

There is no evidence that shows an assessment of the cumulative effects of Lea Castle Village in its entirety on the Green Belt, be it in terms of;

- The openness of the Green Belt
- The coalescence between Kidderminster and Cookley
- The very substantial adverse landscape and visual effects on a wide range of landscape receptors and far reaching views.

This contradicts the statements made by WFDC that full consideration has been given to cumulative effects.

## 1.2 **Our Evidence Demonstrating the Extensive Substantial Adverse Cumulative Effects of Lea Castle Village**

In our submissions, we have provided our own evidence, particularly where the site we are promoting (Land to the Rear of Baldwin Road) and the expansion of Lea Castle have been assessed, to demonstrate the extensive substantial adverse effects on many landscape receptors and important views (many of which are far reaching) of the Lea Castle Village.

A summary of these effects, taken from our High Level Landscape and Visual Impact Assessment identified the following:

### **Landscape effects:**

**Green Belt = Very Substantial Adverse.** The proposed development will result in the physical and visual coalescence and merging of Kidderminster with Cookley; it will result in the extensive sprawl of Kidderminster to the north and east; it is at complete variance with safeguarding the countryside from encroachment. It would cause a total permanent loss to the openness and highly rural characteristics that currently prevail.

**Ancient Woodland, Axborough Wood = Substantial Adverse.** With the benefits of increased accessibility and wide provision of footpaths into and through the site to serve 1400 new homes, new school, sports facilities Local Centre and 12ha of employment land – and with it the huge increase in people - comes the greater threat to the protection and control of access to this highly sensitive and irreplaceable ancient woodland. There is no indication of how this rare habitat will be protected.

**Landscape Character = Very Substantial Adverse.** The proposed development will be at complete variance with the landscape character and will cause the permanent loss to a wide range of elements and features of the landscape and its aesthetic and perceptual qualities. The change in landscape character will be experienced from all sides – north, south east and west and also visually experienced from some considerable distance. It will change from open, elevated, rolling farmland in open countryside which provides an important green gateway both east and north into Kidderminster into an urbanised new settlement.

**Topography = Very Substantial Adverse.** There will be extensive changes to the undulating and rolling nature of the rising land to accommodate development. This will be particularly prevalent to the south where large warehouses associated with employment use are proposed with the need for large flat platforms and resulting extensive cut and fill and retention. This in turn will effect the root protection areas of the surrounding woodland, hedgerows and mature trees.

### **Visual Effects:**

Due to the open elevated nature of the land, visibility of the Lea Castle Village site is far reaching – 4km out to Kinvers Edge in the north-west; 2.5km to the north; 3.25km to the north east; 1.5km to the south

east; 2km to the south and 1.5km to the west. Views from highly sensitive receptors include users of the Staffordshire Way National Trail; visitors to Kinver Edge Scheduled Monument; users of the North Worcestershire National Trail. High and Medium Sensitivity receptors include scenic road and public right of way users and residents on the north eastern edge of Kidderminster.

The predicted levels of visual effect are **Very Substantial Adverse** to local residents at Broadwater and residents west of Hurcott; users of the A451 Stourbridge Road and the A449 Wolverhampton Road travelling both west and east, and; scenic road users on Perriford Lane, Axborough Lane and Beech Tree lane. For all these receptors the proposals will cause a very substantial deterioration to a large proportion of the existing rural view of exposed, elevated and open farmland.

**Substantial Adverse** visual effects are predicted to be experienced by users of the North Worcestershire National Trail approx 1.85km distance and users of public footpath 570 (C) both to the north of the site, where the development would degrade the integrity of the unique landscape characteristics to the northern part of the site and cause a major deterioration to the view.

**Moderate Adverse** visual effects are predicted to be experienced by users of the Staffordshire Way National Trail, visitors to Kinver Edge Scheduled Monument and users of public footpath Kinver 25. Whilst all are long-distance panoramic views, the open, elevated, green and rural nature of the site forms a moderate proportion of the view, which will be permanently lost with the proposed development.

As the findings of the High Level Landscape and Visual Assessment show, had the cumulative effects of the Lea Castle Village proposal been assessed it would have identified the many substantially adverse landscape and visual effects and it is unlikely that WFDC would have been able to justify its allocation.

### 1.3 The Lea Castle Allocation

Lea Castle was allocated as a previously developed site in the Site Allocations and Policies (SAP) Local Plan 2013 under Policy SAL PDS1. This states that when, *'considering development within the sites as being previously developed, proposals will be permitted providing that they do not have a greater impact on the openness of the green belt and the purposes of including land within it other than the existing development*'.

Lea Castle Village now proposes to expand from the former hospital site (48.4ha) into three large land parcels north, west and east and increase in size to a written stated area of 119 ha. Such an expansion contradicts entirely Policy SAL PDS1 – since the development, designed as a village in its entirety, will have a far greater impact on the openness of the green belt as it expands by over double its previous size into open, elevated countryside.

### 1.4 Inconsistencies in the amount of land to be removed from the Green Belt

Policy 31.0.1 states, 'all land bound by the A449 Wolverhampton Road, Axborough Lane, A451 Stourbridge Road and B4190 Park Gate Road will be taken out of the GB - Approximately 119 ha. However, other than the concept plan issued in October 2018, there is no updated plan or framework information on the WFDC or Homes England portal to confirm this.

This figure conflicts with a table in Policy 31.0.1 and Green Belt Topic Paper 2019 which both tally up to a different figure of 104.3ha.

**Policy 31 - Lea Castle Village**

The area identified on the Policies Map, is allocated for a sustainable, well-designed village. This should be developed in accordance with this policy and all general policy requirements, including any necessary developer contributions.

**Table 31.0.1 Lea Castle Village** [View Comments \(0\)](#) [Add Comments](#)

Table 31.0.1 Lea Castle Village					
Site Ref	Site description	Proposed Use	Indicative no. Dwellings / Employment ha	Gross Site Area (ha)	Removed from Green Belt?
WFR/WC/15	Lea Castle Hospital	M	600 <sup>(34)</sup>	48.4	Y
WFR/WC/32	Lea Castle East	M	300 / 7Ha	19.9	Y
WFR/WC/33	Lea Castle West	M	400	24.5	Y
WFR/WC/34	Lea Castle North	H	100	11.5	Y

Excerpt from GB Topic Paper 2020

Lea Castle Village					
WFR/WC/15	Lea Castle Hospital	M	600	48.4	Y
WFR/WC/32	Lea Castle East	M	300 / 7ha	19.9	Y
WFR/WC/33	Lea Castle West	M	400	24.5	Y
WFR/WC/34	Lea Castle North	H	100	11.5	Y

### 1.5 Site Selection, August 2019, Evidence Paper

This supports the Green Belt Topic Paper, October 2020, and draws together all the different streams of evidence in relation to each site and tells the story as to why some sites were allocated and others were not.

The Green Belt Topic Paper, 2020, states that,

*'Consideration was given to the Green Belt Review Stages 1 +2, " and any cumulative effects/common circumstances which could affect whether a site, or groups of sites, should be taken forward for allocation'.*

**There is no evidence in this document, or the raft of other evidential documents, to suggest that the cumulative effects of Lea Castle Village have been assessed.**

## 1.6 Worcestershire Green Infrastructure Partnership: Local Plan (2016-2034) Preferred Options Constraints and Opportunities Analysis

This document, prepared by WFDC officers constituting a task group of The Worcestershire Green Infrastructure Partnership, identifies the likely and significant constraints and opportunities for future development of sites brought forward as preferred options up to Jan 2018.

### Caveat

Due to limited availability of 'desktop data', the initial comments come with a strong caveat: new data could emerge later in the process potentially leading to a reduction in developable areas or even a need to delete sites entirely. Due to this risk, a number of broad requirements have been set out for further environmental study for all sites:

- **Ecology** - Strong recommendation that the council requires (or commissions) PEAs (Preliminary Ecological Appraisals) of key sites in order to identify those sites which have realistic potential to support protected species or important habitats, as these may subsequently require space or mitigation in subsequent planning applications. NOTE: specific recommendations are made for a number of the sites in the report.
- Recommend that biodiversity enhancements are site specific, seek to link ecological enhancement to the wider area and take opportunities to link biodiversity with other elements of GI, notably drainage, historic landscape character and access.
- Long term management of retained and created habitats will be critical in delivering sustainable development across the district and discussion of this should be started at the earliest possible stage of the development process for each allocated site.
- **Hydrology** - SuDS should be required on all sites and used to their full potential.
- **Landscape** - With the exception of climate, landscape is the physical whole that unifies all other environmental and cultural characteristics. Assessments of landscape character, inherent sensitivities and opportunities for enhancement will be a requirement for all sites to ensure the best possible outcome for multifunctional benefits delivered through Green Infrastructure. Site-based assessments should however be set within a strategic context so that opportunities for enhanced connectivity, views and setting can be maximised.
- **Historic Environment** - Inherited historic character, a result of historic land use, is an integral part of most landscapes often commonly expressed through field boundaries, roads, lanes and footpaths, woodlands, modified watercourses and the structures and remains of historic buildings and past human activities. Green Infrastructure design should be informed by site-based assessments to identify opportunities to protect heritage assets and protect and enhance the setting of assets and historic buildings.
- **Sites Highlighted in Amber** = greatest risk of impact and requiring further investigation
- **Sites in Red** = multiple and/or potentially critical issues requiring further investigation

### **Assessment of Lea Castle – (Highlighted Amber ) WFR/WC/15 and WFR/WC/32 - Lea Castle Hospital and East of Lea Castle**

This assessment only assesses WFR/WC/15 – Lea Castle Hospital Site (48.43ha) and WFR/WC/32 – Land east of Lea Castle Hospital (19.9ha).

It fails to include the other two large land parcels WFR/WC/33-Land West of Lea Castle Hospital (23.5ha) and WFR/WC/34 – Land North of Lea Castle Hospital, which are dealt with separately further into the report.

Again, the evidence fails to assess the cumulative effects of the Lea Castle Village proposals.

Findings and Recommendations to address the key landscape sensitivities of WFR/WC/15 – Lea Castle Hospital Site and WFR/WC/32 – Land east of Lea Castle Hospital:

**Site WFR/WC/32 East** is identified as a ‘highly sensitive site with open south-east views’.

- Development should consider ‘*a low density masterplan that includes areas of GI - we also recognise that this approach risks impacting the neighbouring settlements by dint of much greater impact to landscape character particularly in relation to openness and topography of the site and its setting*’.
- Integrated planting and street trees to soften the visual impact and tie-in with the wooded setting to the north-west.
- Axborough Wood and the A451 should be substantially buffered and development should be avoided along the higher north-western boundary to preserve views of the existing linear tree line.
- The north-eastern boundary of the site should incorporate a strategic corridor working with the topography to preserve open views on approach. Existing mature boundary trees along A451 should be retained and enhanced to partially screen and allow filtered views from the development.

**Site WFR/WC/15** is thought to contain acid grassland a highly sensitive and scarce habitat, broadleaved woodland, mixed woodland and yew woodland resources. These habitats will likely hold value for protected species.

- Biodiversity Action Plan Habitats retained on site wherever possible.
- Take a wider strategic approach to GI and create a linked corridor with other nearby sites to create a wildlife corridor from Lea Castle down to the woodlands and pools at Hurcott/Podmore.
- Partition of acid grassland habitat into managed nature conservation area. There is no indication of where this lies on the site in relation to the proposed concept masterplan.
- Thickening of hedgerow corridors
- Protection and enhancement of woodland

Summary – ‘On balance, the impact upon local landscape setting associated with "Option B" (WFR/WC/32) might become more acceptable if appropriately mitigated and broader, tangible Green Infrastructure benefits are secured’.



## Assessment of Lea Castle – (Highlighted Amber ) WFR/WC/33 / 34 Lea Castle west and Lea Castle North

The assessment is limited to that stated below:

‘A sensitive site that should provide a buffer of existing woodlands and provide visual screening to the south. The western boundary with the A449 should be enhanced to provide screening to the west and enhance the wider Lea Castle site GI network. The north-west of the site should consider buffering the setting of Castle Barns and the avoidance of visual coalescence with Cookley.

Otherwise extensive comments have been made by the WGIP on the Lea Castle complex and we refer you to those comments for these two additional sites’.

### 1.7 **Worcestershire Green Infrastructure Partnership (WGIP): Kidderminster North GI Concept Statement, August 2018**

Lea Castle forms part of this Kidderminster North area. This detailed document sets out a GI framework for this development area that incorporates multi-functional GI, biodiversity, SuDS, access etc.

The partnership contend that the following 5 principles for development are of critical importance for the Kidderminster North area:

1. Overall net gain for biodiversity must be achieved
2. Restoration and recreation of large manageable blocks of the distinctive Wyre Forest acid grassland habitat
3. A strong multifunctional woodland network which contributes to the locations’ biodiversity, landscape and visual amenity. At a larger scale, opportunities are realised to enhance linkage to Kidderminster East area.
4. Containment and on-site surface water treatment utilising SuDS approaches.

Connectivity to the Kidderminster East GI corridor is seen as being inexorably linked.

Drainage from Lea Castle directly into Podmore Pool SSSI

This document identifies that the existing Lea Castle Hospital Site drains directly via a culverted watercourse into Podmore Pool, by Hurcott, part of the Hurcott and Podmore Pools SSSI.

This illustrates WFDC’s lack of consistency shown towards site selection in the extreme, since one of the reasons given to not allocate our promoted site is because it could cause potential harm to the SSSI. An erroneous supposition that we refute – and demonstrate, with our fully considered Drainage Strategy, that our proposals protect and prevent any harm to the SSSI.

Doormouse and Lesser Horseshoe Bats preservation.

It also confirms a dormouse population at the ‘core’ Lea Castle site, **which, considering there are no records within the Wyre Forest District, makes this, ‘even more significant.’**

*'Given the small size of Axborough Wood, it is unlikely this block of ancient woodland alone would support a colony and therefore we anticipate the breeding colony will utilise other blocks of woodland and hedgerows throughout the Kidderminster North and Kidderminster East areas, adding importance to maintaining links around and through developments and site boundaries as well as supporting the favourable management of woodland for dormouse and horseshoe bats through means such as financial contributions'.*

*'We contend that the adjacent highway constitutes a likely obstacle rather than an impermeable barrier to dormouse movement meaning that operations such as removal of roadside verge scrub or hedgerows (e.g. for visibility) may cause significant impact on dormice and horseshoe 'crossing points'. **Preservation of biodiversity value for these protected species within dense residential settings will be highly challenging'.***

#### Proximity of development to Axborough Wood Ancient Woodland

The document identifies a need to protect and buffer the existing Ancient Woodland and that the current proximity of development is inappropriate. A minimum buffer zone of at least 15m is required.

*'Development within WFR/WC/32 (Land East of Lea Castle Hospital) should withdraw from and feather densities in to the ridgeline separating this site from the adjacent WFR/WC/15. This approach will have a dual benefit of protecting and buffering the GI corridor between the two developments whilst also reducing light pollution, and therefore will pose reduced visibility footprint during day and night time along what is a visibly prominent area of the site from receptors to the south and users of the A451'.*

Based upon the concept plan and table in 1.4, the proposed residential and employment land is shown right up the boundary with WFR/WC/15, with a proposed development footprint of 300 houses and 7ha of employment. Neither of these densities/ha will be achievable if the recommendation to withdraw and feather densities from the ridgeline, plus maintain a strong green highway corridor is to be implemented. As the report boldly states; *'Preservation of biodiversity value for these protected species within dense residential setting will be highly challenging'.*

## **1.8 Conclusion**

Based on these findings and the clear lack of cumulatively assessed evidence, the site's allocation for a new village and proposed indicative quantity and mix of development is not justified by the evidence.

Taking into account all the landscape, ecology, hydrology and visual sensitivities, the site appears heavily overdeveloped and will not be able to deliver anywhere near the quantum of development currently indicated, particularly in light of the detailed and prescriptive recommendations / requirements identified in the GI Concept Statement.

This puts into question Lea Castle Village's sustainability, suitability and viability and allocation over and above other more suitable sites.

## 2.0 Matter 4.2: Lea Castle Village

Matter 4.2 - 'Are there exceptional circumstances that justify the proposed changes to the green belt in this location?'

### 2.1 Exceptional Circumstances

The latest Green Belt Topic Paper, October 2020, deals with this in section 8.2. It sets out that the December 2019 judgement on the High Court v Guildford BC's Local Plan by the judge, Sir Duncan Ouseley, provided some clarification on exceptional circumstances;

*"Exceptional circumstances" is a less stringent test than applied to planning applications for development that would normally be seen as inappropriate in the Green Belt, which requires "very special circumstances."*

Furthermore, the judge ruled that no more than one individual circumstance was needed and stated:

*"Exceptional circumstances can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgement, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary".*

### 2.2 Our findings

We have found no exceptional circumstances from a landscape and visual perspective. Indeed the nature of harm by Lea Castle Village to the Green Belt and landscape and visual receptors is of a Substantial Adverse nature and its cumulative effects have been deliberately ignored/avoided.

The 5 separate land parcels have been assessed separately by WFDC. This is disingenuous, since all 5 parcels have been designed as a 'village' to function as one entity.

The NPPF, in Para 138, states that;

*'When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary'*

Lea Castle Village is a standalone proposed new settlement, does not adjoin the existing development boundary, unlike the site that we are promoting (Land to the Rear of Baldwin Road) which is an immediate extension of developed land along the built eastern side of Kidderminster.

Indeed the Green Belt boundary at Land to the Rear of Baldwin Road is currently very weak and has been substantially eroded by residents claiming and extending their rear gardens. Our proposals would ensure a secure and physically fixed green belt boundary defined by Hurcott Lane.

### 3.0 Matter 4.3 : Lea Castle Village

Matter 4.3 - 'How will the development contribute to compensatory improvements to the Green Belt?'

#### 3.1 NPPG Advise

NPPG advise on the role of the Green Belt was published on 22 July 2019, after the WFDC pre-Submission publicated version had been approved by WFDC Cabinet on 16 July 2019. Due to the timing of NPPG guidance this has not been incorporated into the submitted version of the Local Plan.

However, the Green Belt Topic Paper, October 2019, sets out in Section 9 how they believe the plan meets the NPPG through the provision of Green Belt compensatory measures.

#### 3.2 Proposed Compensatory Measures

##### Stour Valley Country Park

Policy 14 – Green Infrastructure, safeguards an area of Green Belt land to the north of Kidderminster Town Centre in the Stour Valley, for future development of the Stour Valley Country Park. This has been a long-standing aspiration of WFDC and is confirmed under Policy SAL.UP3 of the Site Allocations and Policies Plan, 2013. The Council originally published its intention to create a Stour Valley Country Park in the 1996 Adopted District Local Plan and has continued to deliver elements of it since that date. The creation of a new country park would provide a new link between the town centre and the existing green corridor running from Springfield Park, Broadwaters, and Hurcott Pool via the important wetlands of the Stour and Blakedown Brook Valleys.

However, when looking at the adopted Green Infrastructure Strategy, 2012, whilst there is discussion of Stour Valley as an existing Green Infrastructure resource, there is no mention of it being developed as a Country Park. This talks of the need for local development along its corridor to provide a positive relationship with the River Stour, increase natural surveillance and improve pedestrian and cycle access to the Staffordshire and Worcestershire Canal towpath, which in areas is very poor and subject to the major issue of fly-tipping.

##### New Country Park at Former Burlish Golf Course

The site is located in Green Belt, between Kidderminster and Stourport - the southern side of town. Closed in 2017, owned by the DC, it has now been identified as a new Country Park. To be;

*'managed in a similar way to the adjacent Burlish Top Nature Reserve, which would increase the wildlife values whilst also providing public access to Green Belt land'.*

With; *'Approximately 75 hectares ...safeguarded for outdoor sports and recreation'.*

Under Policy AM8G and AM30.29 - Part of the site (former club house and associated buildings) that has been subject to arson attacks has been allocated as a site for Travelling Show People – which requires both residential and business use, since most show people need to live alongside their

equipment. Therefore it will also provide a secure, permanent base suitable for storage and maintenance of equipment (when it is not in use) as well.

Burlish Golf Course Vision Document (June 2019) confirms that the southern portion of the site is allocated for residential development – Site LI/11 = 200 units on a Gross Site Area of 9.52ha.

### **3.3 Our Observations**

The intention to create a Stour Valley Country Park was published over 24 years ago, and by the Councils own admission, has only delivered elements of it to date.

There is no timeline provided to its delivery, nor mention of the allocated sums required to achieve this.

Its location serves the residents of north and west Kidderminster however there is no mention of how it can be linked up to the proposed Lea Castle Site and also serve residents in north east Kidderminster who currently have a severe lack of publically accessible open space within a 1.5km radius.

The location of the Burlish Golf Course Country Park serves residents of south Kidderminster and has no impact or influence upon the Lea Castle Site.

### **3.4 Planning Obligations SPD, 2016**

The Green Belt Topic Paper, 2020, confirms that the SPD makes provision for off-site compensation of sites in the Green Belt.

However on review of this SPD, there is no mention of provision for off-site compensation of sites in the green belt.

The document does state in 1.58 that it is intended that the SPD will be reviewed as part of the Local Plan Review Process. No evidence can be found that suggests this has been done as part of the Emerging Local Plan.

## **4.0 Summary**

We do not consider there is overwhelming evidence to justify an extended allocation for Lea Castle over and above the proposed extension to Kidderminster East on Land to the rear of Baldwin Road. Indeed, there is overwhelming evidence, when unearthed and unpicked, that shows that the assessment of effects of Lea Castle Village on the Green Belt has been inconsistent, fudged and retrofitted. As too has the process of site selection.

One of the greatest omissions in all the supporting evidence is the complete lack of assessment of cumulative effects of Lea Castle Village.

The proposed development will result in the physical and visual coalescence of Kidderminster and Cookley; result in the extensive sprawl of Kidderminster to the north; is at complete variance with safeguarding the countryside from encroachment; would cause a total permanent loss to the openness

and highly rural characteristics that prevail, and; have very substantial adverse effects on a wide range of highly sensitive visual and landscape receptors.

This is affirmed in the Worcestershire Green Infrastructure Partnership's site analysis work carried out in 2018 and their subsequent Kidderminster North Green Infrastructure Concept Statement which identifies significant GI framework requirements to deal with a raft of sensitivities such as: the presence of the very rare Dormouse and Lesser Horseshoe Bats; Ancient Woodland of Axborough Wood; the rare and scarce acid grassland habitat; protection of existing mature trees -particularly to the A451 and internally within the hospital site, hedgerows and woodland, and; wide range of visual and landscape character issues that require mitigation. Such mitigation includes avoidance of development on the high ground and adjacent to woodlands; a low density masterplan; fully integrated planting and street trees to soften the visual impact; woodland and hedgerow protection, buffering and enhancement; light pollution mitigation etc. - to secure appropriately mitigated, tangible Green Infrastructure benefits.

All of these GI requirements will have a considerable impact on the developable areas.

Taking into account all the landscape, ecology, hydrology and visual sensitivities, the site appears heavily overdeveloped and will not be able to deliver anywhere near the quantum of development currently indicated, particularly in light of the detailed and prescriptive recommendations / requirements identified in the GI Concept Statement.

This puts into question Lea Castle Village's sustainability, suitability and viability and allocation over and above other more suitable sites.

The proposed compensatory measures that include Stour Valley Country Park are laudable. However, whilst this has been a long standing aspiration for over 24 years, by WFDC's own admission, they have only delivered elements of it to date. Its location does not serve residents of north/north east Kidderminster where there is a desperate lack of public rights of way and public open space within a 1.5km radius. Our promoted site would provide a much needed Country Park to this area of Kidderminster that would buffer and protect Hurcott Village and SSSI, meet a wide range of GI, biodiversity, health and wellbeing/community benefits in addition to providing housing.

