

WYRE FOREST DISTRICT LOCAL PLAN (2016-2036) EXAMINATION IN PUBLIC

**Matter 3: Overall Spatial Strategy, the Green Belt and the Overall
Housing and Employment Land Requirements**

Persimmon Homes

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Hearing Statement

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REPORT

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1 MATTER 3: OVERALL SPATIAL STRATEGY, THE GREEN BELT AND THE OVERALL HOUSING AND EMPLOYMENT LAND REQUIREMENTS

- 1.1 This Matter 3 Hearing Statement has been prepared on behalf of our client Persimmon Homes ('Persimmon') for Wye Forest District Council's ('the Council') Local Plan 2035 ('the Plan') Examination in Public. Persimmon is the 'Freehold' owner and developer for the Plan's 'Catchems End' allocation at Bewdley (Policy WA/BE/3). The Statement should be read in conjunction with previous consultation responses RPS has submitted to the Council on behalf of Persimmon in relation to this Local Plan (some of which are referred to in this Statement).

3.1 Overall, does the Plan set out a sound spatial strategy for meeting development needs, including any unmet need from neighbouring areas, and protecting and, where possible, enhancing the environment? And in particular:

a) is the broad apportionment of housing, economic and other development to the various centres, locations and rural areas throughout the District consistent with the Plan's spatial vision and objectives, and does it promote sustainable patterns development?

- 1.2 Persimmon considers that the Plan does set out a sound spatial strategy for meeting development needs, but that the apportionment of housing to the town of Bewdley could be stronger.
- 1.3 The Council's Settlement Hierarchy Technical Paper (ref: EXAM SH01 July 2019) identifies a list of settlements in the District, ranked in terms of sustainability (pages 8 and 9). On this list, Bewdley is ranked as the third most sustainable location, behind the towns of Kidderminster and Stourport-on-Severn. Yet, despite the identified sustainability credentials, in terms of the apportionment, growth at Bewdley is considerably lower than the aforementioned towns of Kidderminster and Stourport-on-Severn. As indicated in Table 6.0.2 of the Submission Plan (ref: EXAM SD1), only 225 dwellings are proposed for allocation at Bewdley, when compared to Kidderminster (990 dwellings) and Stourport (984 dwellings).
- 1.4 The Council's 2019 Site Selection Paper (ref: EXAM SSP01) confirms that land to the west of Bewdley is heavily constrained, both in topography and in terms of the historic environment (paragraph 12.2) and the most suitable sites to bring forward are to the east of the town. RPS would agree with this statement, however, considers that the Council should be doing all it can to boost delivery to Bewdley, commensurate to its role as sustainable town.

1.5 With this in mind, It is Persimmon’s view that the Council should ensure that housing allocations identified at Bewdley are used to their full capacity to help make sure the opportunity to deliver much need growth at Bewdley is driven through the plan-led process. This is considered further in detail below.

b) is it based on adequate evidence, consistent with national planning policy, and is it deliverable within the Plan period?

1.6 Persimmon consider that the spatial strategy is based on a robust evidence base including a Sustainable Appraisal (‘SA’) which has been prepared by a reputable and experienced consultant on behalf of the Council. There are however issues with parts of the evidence base and these are considered in detail below at paragraph 128.

1.7 To demonstrate that the Catchems End site is ‘deliverable’ as defined in the National Planning Policy Framework (NPPF), Persimmon have advised on the delivery trajectory set out at **Table 1**. On the presumption that the Plan is adopted in 2021, the start date for the delivery trajectory has been set at 2023-24.

Site name	Location	Capacity	Delivery				
			2021-22	2022-23	2023-24	2024-25	2025-26
Land at Catchems End	Bewdley	c88 dwellings		5	60	23	

Table 1 - Delivery trajectory for Site WA/BE/3

1.8 The site will be ‘built out’ and completed within the five-year period from 2021/22 to 2025/26 and will therefore assist the Council in demonstrating a five-year supply of deliverable housing sites. It is noted that the capacity indicated above (88 dwellings) is higher than the figure of 75 dwellings indicated in Policy 34.6, however as explored as part of the Matter Statement for that session, RPS consider that the Site can accommodate more growth, a finding drawn out of further evidence testing the capacity of the Site.

c) have the potential impacts on the natural environment, landscape, infrastructure, flood risk, air quality and other matters been assessed adequately, and does the Plan provide for mitigatory measures where necessary?

1.9 RPS considers that the impacts on the natural environment have been appropriately considered in the context of the growth strategy for the District. As outlined within the Sustainability Appraisal (‘SA’) (ref: EXAM SD04) and the Site Appraisals (ref: EXAMSD04a), environmental considerations have been accounted for as part of the SA process, both at the Plan level, and for the respective site allocations. In this context, the impact on the natural environment has been set within a wider context of site sustainability.

1.10 Consequently, this information has been used by the Council, as part of an assessment of sites (ref: EXAM SSP01a), where a wider view has been taken on which sites represent the most sustainable locations for growth, having regard to reasonable alternatives for each location.

d) does it make as much use as possible of suitable, previously developed or 'brownfield' land, under-utilised land and buildings, land in public ownership and regeneration opportunities?

1.11 Persimmon has no comment to make on this point.

e) does it promote the development of a good mix of sites for new homes?

1.12 Persimmon is of the view that the Plan does promote the development of a good mix of sites for new homes. This is evidenced in the site allocations at Bewdley which is a settlement that has seen only limited growth previously. This growth is important to help support local services and facilities and provide a range of dwelling types including affordable housing.

f) does the strategy seek to optimise the density of development in line with national planning policy to make the most effective use of land?

1.13 The NPPF emphasises the need to set minimum standards of density for cities and towns as part of the Local Plan. Policy 8A in the Plan identifies a standard of 35 dwellings per hectare ('dph'). The Council considers this density standard appropriate for most development on greenfield sites in town centres, and states it is up to the applicant to demonstrate whether circumstances justify the need for a viability assessment at the application stage. The Council also states that different density standards could be supported where necessary to ensure the development is in sympathy with the development context and existing neighbouring development.

1.14 As indicated in Table 34.0.1 of EXAM SD1, the 'Catchem's End' site is approximately 5.61ha, however this also captures land to the west, expected to remain undeveloped as public open space. The gross area for allocation allows for 'approximately' 75 dwellings, equating to a density of around 25dph. This is a significantly lower than the standard 35 dph set out in Policy 8A.

1.15 Persimmon would question therefore whether an allocation of 'approximately' 75 dwellings makes best and most efficient use of the, given it is only one of three allocations for Bewdley. It is acknowledged that the site is on the edge of Bewdley, and that the site is located within the Green Belt, but in making releases of Green Belt land the Council should be looking to ensure that land identified is used and developed efficiently to maximise the benefits of its release.

1.16 It is considered that through careful design (using key buildings etc...) the density could be increased above that within the policy across the site without impacting upon the local character. RPS and Permission will seek to work with the Council on this issue as a planning application progresses, though in principle, consider that the Council should look to be as flexible as they can be on emerging allocations, to ensure that the land proposed for allocation is utilised as robustly as it can be.

g) is there a reasonable prospect that the necessary infrastructure will be delivered in a timely manner to support the planned development?

- 1.17 RPS made representations to the Plan's Regulation 19 consultation on behalf of Persimmon Homes in relation to the submitted June 2019 Infrastructure Delivery Plan (ref: EXAM IFT01) as there does appear to be a lack of clarity on what is required exactly (in terms of infrastructure) for each allocation.
- 1.18 The representation expressed concerns in relation to Bewdley, where infrastructure requirements are calculated based on the total housing distribution to the town (225 dwellings) rather than on a site-by-site basis.
- 1.19 The position is further obscured when compared to the Council's viability testing of Persimmon's site (referred to in this case as 'Land at Kidderminster Road'). The Viability Update Note submitted by the Council (ref: EXAM IFT05) does not consider sites as such, it reflects only on changes that have occurred since the previous October 2018 Local Plan Viability Update ("2018 LPVA" – ref: EXAM IFT06).
- 1.20 The 2018 LPVA does consider 'Land at Kidderminster Road', where at Appendix 5 of the document, it provides an indication of strategic infrastructure requirements for the site and associated costs. This estimates a total contribution of £2,179,400, which is composed of contributions towards sports facilities, education, transport and emergency services. What is clear from this assessment is that of all strategic sites in this list, the cost per dwelling is the highest for 'Land at Kidderminster Road', in some instances by a significant margin, without clear qualification on how this has been established.
- 1.21 Although Persimmon considers that there are no insurmountable issues that would prevent the viability and deliverability of the Site, greater clarification is sought from the Council on what infrastructure will be required for their site. Until this is available, it is difficult to fully confirm whether there is a reasonable prospect that the necessary infrastructure will be delivered in a timely manner to support the planned development.

3.2 a) Taking account of national planning policy on exceptional circumstances, has the need for changes to the Green Belt boundary been established, and has due regard been paid to its intended permanence in the long term? Is the proposed designation of Reserved Sites likely to be adequate in this respect? [Note: Policy 7B on Reserved Sites will be considered in detail under Matter 6]

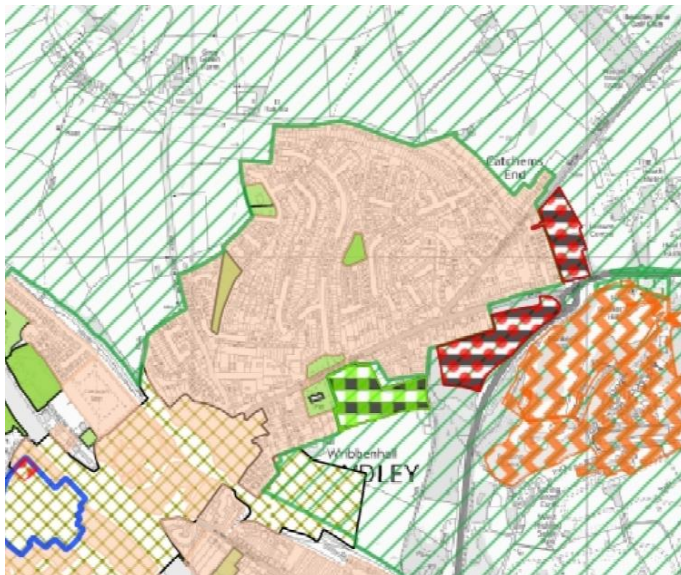
- 1.22 Paragraph 135 of the National Planning Policy Framework (NPPF) states:
"The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions."
- 1.23 The Council has made it clear through its Sustainability Appraisal ('SA') (ref: EXAM SD04) and other supporting studies that Exceptional Circumstances to release Green Belt are justified on

- the basis that the housing need, identified to be at least 5,520 homes to 2036 (based on 276 dwellings per annum) cannot be physically accommodated within the existing urban areas. Given the emphasis within the NPPF to meet housing need (market and affordable) the Council has considered realistic alternative options through its Local Plan review and the Duty to Co-operate. Existing urban areas and non-Green Belt land has been considered, but existing Green Belt land is also required to meet the District's housing needs, including identified needs for affordable housing.
- 1.24 The SA states on page 8 of the Technical Summary that:
- “Since 2010, almost all development in the district has been on previously developed (‘brownfield’) land. This is a sustainable approach because it protects green areas, reduces the need to travel, and provides new homes near existing services and infrastructure. However, there is not enough brownfield land in the district to provide for 5,520 homes. More than half of the new homes will need to be built on greenfield land.”*
- 1.25 It is clear that the Council cannot meet its housing need on previously developed sites alone. The SA also explains over half of the District falls within the West Midlands Green Belt; therefore, it is inevitable that some parts of the Green Belt will need to be developed in order to meet housing targets. The challenge for the Council is to identify the most appropriate sites in the Green Belt for development.
- 1.26 In consideration of the need for Bewdley and in particular the ‘Catchem’s End’ allocation, the SA states (page 8 of the Technical Summary):
- “Bewdley needs some development but this should not overdevelop the town’s heritage or landscape. The Stourport Road Triangle site and land at Catchem’s End are sustainable sites with good access to services and facilities.”*
- 1.27 As a point of note, the Council undertook a Green Belt Review initially at a strategic level with a Part II based upon site analysis. The Strategic Analysis (ref: EXAM GB01) concluded that areas that make a ‘significant contribution’ to the Green Belt are predominantly located around the western edge of Kidderminster.
- 1.28 The subsequent Part II Strategic Analysis (ref: EXAM GB02) considers Persimmon’s site (as part of a wider tract of land identified as ‘Parcel SW2’), noting that the area makes a contribution to the separation of Bewdley and Kidderminster, serving to prevent encroachment and sprawl (Page 6 of Appendix B6 refers). Whilst the appraisal considers that development would reduce openness and uncharacteristically urbanise the land, it is noted that development here would act as a long-term edge for the settlement.
- 1.29 Furthermore, the assessment was prepared without the benefit of detailed designs for the site, including a landscape strategy that could demonstrate how the impacts of development could be appropriately mitigated. Although some harm to the Green Belt has been identified, the sustainability of the location and the potential for further mitigation provides sufficient justification for the site to be released from the Green Belt through this process. This is consistent with the Council’s aims to deliver a fair share of growth to Bewdley, whilst ensuring that protection is given to land to more sensitive land to the west of the River Severn.

- 1.30 The Council's Green Belt evidence also confirms that development on this site will run up to the boundary of the A456, which serves as both a defensible physical boundary but also a feature that ensures the enduring nature of Green Belt to the east.
- 1.31 RPS considers that there is a clear and compelling case for Green Belt releases at Bewdley, and as indicated above, release of land at Catchems End is justified in the interests of ensuring growth, whilst not compromising features of historic and landscape importance to the west of the town.

b) Does the Plan provide adequately for compensatory improvements to the environmental quality and accessibility of remaining Green Belt land?

- 1.32 In short, yes. A substantial area to the west of the 'Catchem's End' allocation will be 'gifted' by Persimmon as part of the proposal to provide for open space, compensatory improvements to the environmental and access to remaining Green Belt land.
- 1.33 Below is an extract from the submitted Plan's 'Proposals Map' which identifies the size and full extent of the land to be gifted. The green check on the map designates the area, which Persimmon can confirm to be 2.54ha of land. The area proposed for residential development is in the region of 3.5ha, however only 2.3ha of this land is anticipated to be developed.
- 1.34 As illustrated, the proposed open space is significant, and commensurate in size to Persimmon's proposals for development. The designation will open up this area of the Green Belt to public access and ensure the preservation of its openness. This is a significant compensatory proposal in line with Paragraph 138 of the NPPF, and notably, the most significant offer of all the proposed allocations for Bewdley.



Wye Forest District Local Plan 2016 - 2036 Proposals Map Extract

- 1.35 This fact is also recognised in WA/BE/3 for the allocation which states:

“7. The western site parcel is allocated as open space. The potential to use some of this land for allotments should be explored with the Town Council”

3.3 Having regard to the housing and employment need figures and the spatial planning considerations above, is it justified to set 5,520 dwellings (at least 276 dwellings per year) as the housing requirement for the Plan period and at least 29ha as the employment land requirement?

- 1.36 RPS on behalf of Persimmon made representations to the Plan’s Regulation 19 consultation in relation to housing numbers (Policy 6A).
- 1.37 In terms of the affordable housing need in the District, a figure of 158 dwellings per year is identified in the Plan at paragraph 8.11. Policy 8B proposes a *‘minimum annual average target of 90 affordable dwellings’* to be delivered during the plan period to 2036 (1,800 dwellings).
- 1.38 The policy goes on to seek a *‘minimum of 25% (affordable homes) on sites of 10 or more homes, or sites of an area of 0.5 hectares or more, will generally be required.’* Persimmon notes that the policy then states that, *‘Individual site characteristics may mean that this level of provision is not achievable on all development sites...’*, suggesting that the Council accepts that viability issues may impact on the delivery of affordable housing.
- 1.39 As it stands, the Plan will only deliver around 1,380 affordable homes up to 2036 (25% of 5,520), or 69 affordable dwellings per year. This is lower than recent average completion rates of affordable housing achieved in the District (96 affordable homes per year based on figures set out in the Plan (paragraph 8.11). Consequently, it is evident that the Plan would fail to deliver the necessary numbers of affordable homes required based on the preferred housing requirement of 276 dwellings per year and the affordable housing target of 90 homes per year, a shortfall of 21 affordable homes per year.
- 1.40 As such, there is an inconsistency between the Plan’s affordable housing objectives and its strategy to achieve them. To deliver 90 affordable homes per year, or 1,800 homes over the Plan period (as a minimum), a housing target of 7,200 is required (25% of which is 1,800) between 2016 and 2036 or 360 dwellings per year.
- 1.41 An annual housing target of 360 dwellings per year was advised by Persimmon in its Regulation 19 consultation based on the above points, the Plan however still only proposes 276 dwellings per year.
- 1.42 There is clear justification for a housing requirement that is higher than the minimum housing need of 276 homes per year. Persimmon continues to advise that the uplift required to the preferred minimum local housing need figure should be set at a such a level sufficient to provide every opportunity for the preferred affordable housing target to be met year-on-year. A housing requirement of 360 dwellings per year, which would properly and effectively support the delivery of 90 affordable homes per year as a minimum (at 25% as per Policy 8B).
- 1.43 Not only would this increased annual housing requirement deliver a greater number of affordable housing, it would also provide an essential buffer to the proposed housing delivery thereby making the Plan resilient to any future changes. The Council should be planning positively for growth and the proposed increased annual housing requirement would do just

that. As part of the solution to addressing the need for affordable housing, the Council should look to maximise the development potential for the proposed allocations as indicated above. Although it is unlikely that this move alone will address the extant affordable housing need, it will make an important and incremental change to close the gap.

3.4 Should a housing requirement figure for each of the designated neighbourhood plan areas be set out in the Plan?

1.44 Persimmon has no comment to make on this point.