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**WYRE FOREST LOCAL PLAN, MATTER 3**

Overall spatial strategy, the Green Belt and the overall housing and employment land requirements

Campaign to Protect Rural England (Worcestershire Branch)

November 2020

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***Matter 3: Overall spatial strategy, the Green Belt and the overall housing and employment land requirements***

*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. We generally support the balance of allocations between settlements, although not the quantum, but we believe there is further scope for housing within Kidderminster town centre, in particular, in some cases replacing redundant retail space, as well as above it, as set out in other answers.

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

2. As set out elsewhere, we believe it is not consistent with demographic evidence, or in relation to windfalls.

*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?*

3. We are concerned that insufficient weight has been given to the natural environment, particularly in relation to housing allocations.

4. We are particularly concerned that the landscape impact of the expansion of Lea Castle village beyond brownfield area has been ignored. Dr Peter King provided a detailed assessment of this in 2018 at the final objection phase. See objection by CPRE to Policy 31 and annex to that. The westward extension of Lea Castle village is incapable of being hidden. However, if (contrary to our wish and out view on housing need and the Green Belt) the eastern extension is developed, the planting

anticipated in a WFDC drawing<sup>1</sup> should be undertaken at least 10 years before development is commenced to enable trees to reach a suitable height to hide the development.

*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?*

5. As explained under Matter 2 the plan makes no allowance for windfalls in Table 6.0.2 of the Plan. However, we support Policies 6B, 8C and 35 which positively plan for windfalls to come forwards

6. We believe the council should positively encourage currently non-deliverable sites would come forwards in the future.

7. A further potential boost to windfall supply is the Government support for Conversions. Policy 18c supports that in general and is welcome with its appropriate safeguards. However, this could include further encouragement, for example, by identifying opportunities for extensions and additional storeys where this is in character with the area.

8. Moreover, the COVID crisis has accelerated changes to retail behaviour, which along with other post-COVID structural changes may well lead to sites becoming available (including larger sites) for development, particularly in town centres or on retail parks. While we support the principle of both Policy 10B and Policy 22A, we believe this will need to be a dynamic process so the Council an additional commitment by the Council to review Town Centre development opportunities may be appropriate.

9. Given the comments made in Matter 2 regarding currently 'non-deliverable' sites, a proactive approach to brining forwards such sites where appropriate would be welcome as well as specific policy support for ensuring vacancy rates stay low. A robust and successful strategy in the District on vacancies would be supported by CPRE and could be enshrined in the Plan.

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

10 No, the current proposals would provide too many sites in less sustainable locations and not place enough emphasis on brown field redevelopment.

*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?*

11. In terms of Density, Policy 8a of the Submission Plan refers to 'Greenfield houses in Town Centres' having a density of 35 dwellings per hectare. I assume the word 'greenfield' is, in this case, a typing error and should be 'brownfield'. Elsewhere the policy is vague. This could potentially allow for lower density sprawl on the large peripheral sites proposed in the plan.

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<sup>1</sup> Wyre Forest Plan Appendix B Maps, Page 81

12. The density policy also appears not particularly ambitious. The GL Hearn Study Strategic Growth Study of the Greater Birmingham HMA (2018) suggested 35 dph as an average across local authorities outside the urban core. Given that urban sites can have much higher densities, this seems a reasonable, perhaps conservative, aspiration. (Appendix 3.1)

13. While any detailed yield assessment this must inevitably include sites which cannot meet those level, (especially small sites with awkward boundaries) an overall yield based on a higher density should have been assessed.

14. Not least, this should be done so it is clear that the Council has fulfilled the requirement in Para 137 of the Revised NPPF to establish whether the plan:

*‘optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport.’*

15. This should certainly be done before any claim for exceptional circumstances for development in the Green Belt is put forwards.

16. It is perhaps also worth pointing out that the Plan’s dwelling mix which is skewed towards smaller houses (i.e. one and two bedroom) and which will almost certainly need to include smaller flat units for a growing elderly population, should lead of itself to higher average densities.

17. It would certainly have been helpful had the Council reviewed all the allocated sites based on a density of 30 dph but without that data it is hard to estimate how much additional housing could result from such an approach.

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

18. This is not something we can comment on in detail. However, the strategy of attracting in-migrants, who we suspect will largely come from the West Midlands is likely to put additional pressure on transport infrastructure and we are not convinced the implications of that have been fully appreciated.

*h) has the Plan been adequately informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development?*

19. Worcestershire CPRE agrees with the Council that the housing market for Wyre Forest is self-contained. However, we are aware that both the Black Country and Birmingham argue for an allowance to meet their unmet need.

20. As set out in Matter 2 the unmet need in the Black Country is significantly lower if the 2016 ONS figure is adopted under the Standard Methodology. That is also true for Birmingham, (though not to the same extent).

21. We also do not agree that the overspill need which they refer to as ‘established’ in the 2017 Plan, can still be justified. CPRE argued at the Birmingham Examination that it was over-estimated and we believe that has proven right.

22. In the case of windfalls, for example, the Inspector refers to an assumption of:

*‘a windfall allowance for some 7,600 dwellings over the remainder of the BDP period (up to 2031). This figure is based on an annual allowance that is initially set some way below the lowest windfall completion rates of recent years, and then increases gradually over the period to reflect the expected recovery in the housing market.’*

23. He went on to say he was:

*‘satisfied therefore that the overall windfall allowance is based on sound evidence and is realistic and achievable. Indeed, in practice it is likely to be exceeded.’ (Appendix 3.2)*

24. In just the two years after the adoption of the Plan there were 4,425 windfall completions. CPRE argued that an allowance of 1,000 dwellings per year should be included and that has been far exceeded since 2016. (Appendix 3.3)

25. Furthermore, the level of housing need in Birmingham also drops if one adopts the 2018ONS figures, and very significantly drops from 3577 to 3056 if one adopts the New Standard Methodology with the 2018ONS figures.

26. In other words, the level of actual shortfall in Black Country and Birmingham, are not matters which we accept are established. Nor do we agree that sacrificing further Green Belt in Wyre Forest to meet that need.

*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]*

27. The updated supply side housing figures are given in table 6.0.1 of the Pre-submission Plan as 6365. These roughly equate to the 20-year OAN figure of 5,520 plus 15% (6348).

28. Unhelpfully this is not broken down in a way that makes it easy to assess how much is previously developed land and how much is greenfield land in the Green Belt. However, analysis of the tables in policies 30-36 suggests there are 3591 homes which would be in Green Belt (See Table 1) and 2774 from non-Green Belt supply.

29. The only difference we can identify with the pre-submission stage is the removal of AKR/18 (Yew Tree Walk) and the addition of WFR/CB/3.

30. As we set out in Matter 2 an OAN of 4620 would be in line with the Government’s Standard Methodology and meet the development needs of the District, providing

sufficient economically active people, or 4851 homes including a 5% buffer for non-delivery.

31. Of those 2774 could be provided on sites not in the Green Belt according to the Council. Allowing 784 homes on windfall sites would create a supply of 3558 homes. This would leave a shortfall of 1293.

Table 1

Plan Table	Ref	Site (indicates highest concern to CPRE*)	Dwellings	Hectares	Housing/Mixed
30	WFR/WC/18	Sion Hill School Site	56	2.1	H
30	WA/KF/3	Land at Low Habberley	120	5.6	H
31	WFR/WC/15	Lea Castle Hospital	600	48.4	M
31	WFR/WC/32	Lea Castle East*	300	19.9	M
31	WFR/WC/33	Lea Castle West*	400	24.5	M
31	WFR/WC/34	Lea Castle North*	100	11.5	H
32	OC/5	Land at Husum Way*	30	2.1	H
32	OC/6	Land East of Offmore*	300	28.36	H
32	OC/12	Comberton Lodge Nursery*	10	0.8	H
32	OC/13N	Stone Hill North*	1100	57.1	M
33	LI/11	Land West of Former School Site, Coniston Crescent	200	9.53	H
33	MI/38	School Site, Coniston Crescent	115	3.64	H
34	WA/BE/1	Stourport Road Triangle*	100	3.67	H
34	WA/BE/3	Cathcem's End	75	5.61	H
34	WA/BE/5	Land South of Habberley Road	35	1.71	H
36	WFR/CB/3	Land off Station Drive, Blakedown*	50	2.74	H
<b>Total</b>			<b>3591</b>		

Wyre Forest Green Belt housing sites from Tables 30-36 in Submission Plan (not including Traveller Sites and Economic Development Proposals)

32. However, that does not include any allowance for increasing density or reducing vacancies which could yield further housing supply.

33. Part of such a shortfall (656 homes) would be met by developing:

- the core element of the Lea Castle site (WFR/WC/15), which although currently Green Belt, is on previously developed land and less sensitive than other elements of Lea Castle identified in the plan
- the Sion Hill School Site (WFR/WC/18).

34. As a result, there does not appear to be a need for such large-scale Green Belt allocations elsewhere. The outstanding figure is 637. A further 545 homes are on the sites CPRE Worcestershire considers less damaging, (see table) leaving 92 outstanding. The reduction in the required housing allocation in Green Belt would be 2298.

35. We would, however, also stress there is a case for enhancing Green Belt to better ensure environmental and amenity benefits as was said at the Options Stage and this is something we support.

36. At a policy level the release of Green Belt requires exceptional circumstances. The Government's position as we understand it, is still that housing numbers alone do not represent exceptional circumstances and that Green Belt can act as a restraint which means Councils cannot meet their OAN<sup>2</sup>, contrary to what is said in para 7.14 of the Submission plan.

27. Policy 7 of the Submission document claims:

*In accordance with paragraph 136 of the National Planning Policy Framework, a number of changes will be made to the Green Belt boundaries to support the strategic development of Wyre Forest through this Plan...*

28. However, Paragraph 137 of the Revised NPPF is specific in terms of how exceptional circumstances might be established when there is an identified shortfall of development land and a plan maker needs to show he has considered all reasonable options. It identifies three particular avenues that need to be fully explored, specifically the use of brownfield and underutilised land, an increase in density and discussion with neighbouring authorities.

29. While it is made more difficult to assess whether Green Belt changes are needed to support strategic development in Wyre Forest since there still does not appear to be a policy in the plan which specifically sets out the strategic goals of the plan (as opposed to the numbers of houses and offices), the comments above on both density and windfalls suggest the first two elements of Para 137 have, quite simply, not been fulfilled.

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<sup>2</sup> NPPG: Housing and economic land availability assessment Paragraph: 002 Reference ID: 3-002-20190722

30. But even if housing numbers alone were enough to justify removal of Green Belt, our evidence suggests that the level of housing need and supply does not requires the loss of Green Belt on the scale the Council is suggesting (and that would even be the case if the ONS2016 Standard Methodology were applied in an up-to-date way.)

31. Without additional work to justify specific Green Belt releases and further consideration of reasonable alternatives, it is unclear whether the Green Belt review can, therefore, be considered a sound basis for the level of releases identified, given that the assumptions behind those release has not been properly established.

32. As well as impacting on whether sites should be released in this Plan Period, a corollary is that the Safeguarded Sites may not be required, or there may be sites allocated which should instead be Safeguarded Sites.

33. In terms of Industrial Land CPRE Worcestershire accepts that some Green Belt releases may be required. We address individual sites elsewhere, but we specifically do not agree that the allocation of a further 7 has at Lea Castle answers the 'exceptional circumstances'.

34. Whatever is decided, in general terms we support the concept that any Green Belt loss should be compensated elsewhere with new Green Belt.

*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?*

35. As set out above a housing requirement of 4620 dpa is in line with Government Policy, based on the Standard Methodology (4067 in terms of actual allocations). We see no pressing reason to increase that in Wyre Forest, based on the economic and environmental evidence) especially given that any increase directly impacts on the protection of the Green Belt.

36. A figure for employment land between 26 and 29 has is also appropriate. While there would be a small immediate short-fall if the additional Lea Castle Employment Land were not included, we consider the landscape and Green Belt considerations out-weight that small loss and alternative options should be pursued, perhaps through the Duty to Co-operate.

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

37. It is our view that it is not reasonable to expect a Neighbourhood Plan Team to determine the Objectively Assessed Need of a village. This needs to be determined as a strategic matter in the District's Local Plan. It is of course then open to the village to adopt a higher target. It is to be hoped that the Planning Committee will refuse applications in Neighbourhood Plan areas for sites not allocated under an adopted Neighbourhood Plan.