

Taylor Wimpey UK Ltd

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Matter 3: Overall spatial strategy, the Green Belt and the overall housing and employment land requirements (Policies 6B-6F, 7A, 7B and supporting text)



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DESIGN **ENVIRONMENT** **PLANNING** **ECONOMICS** **HERITAGE**

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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?

3.1.1 The spatial distribution of growth aligns to the identified settlement hierarchy, with development focused to the three main towns of Kidderminster, Stourport-on-Severn and Bewdley. Outside of these settlements, growth relates to meeting locally derived needs. The greatest proportion of growth is allocated to Kidderminster which is consistent with the town's role as a Strategic Centre, providing: the administrative centre of the District; a focus for public services; and a focus for employment. This approach to the broad apportionment of growth is consistent with the Plan's spatial vision and objectives, including the delivery of the Kidderminster Eastern Extension to meet local housing needs and provide extensive new green infrastructure.

3.1.2 The apportionment of growth has regard to brownfield site availability within Kidderminster and recognises the role of Kidderminster within the District as a focus for retail and commercial leisure opportunities, supporting a vibrant visitor economy and evening economy. In addition, the apportionment of growth to Kidderminster recognises the opportunities available for seeking to remedy current infrastructure issues, including traffic congestion in the town centre. Taylor Wimpey UK Ltd (TW) recognises that the delivery of new infrastructure will be necessary to support new development to mitigate for needs arising from new residents and the opportunities that may exist for assisting in delivering strategic infrastructure projects that have a far wider benefit to businesses and residents within the District and could assist in addressing a number of the objectives identified.

3.1.3 It is noted the Inspector questioned the lack of a single policy to set out the overall spatial distribution and quantity of the proposed development in the District **[ED6]**. The Council has responded to confirm a policy will be provided through Main Modification and this is supported by TW to provide further clarity and links back to the vision and objectives.

B) Is it based on adequate evidence, consistent with national planning policy, and is it deliverable within the plan period?

- 3.1.4 The spatial strategy has been informed by a wide range of evidence which TW considers 'sound'. The Site Selection Paper **[SSP01]** provides an overview as to how this evidence has informed the spatial distribution of growth, having regard to a range of alternative spatial options.
- 3.1.5 The spatial strategy has been informed by a Sustainability Appraisal process that has been iterative in the formulation of the Local Plan. The Council considered a number of growth options through an Issues and Options consultation, including Option 3 (Brownfield regeneration focused on main towns plus expansion of Kidderminster to SE via sustainable urban extension). This was deemed a sustainable option with Options 2 and 3 providing the most sustainable greenfield locations within Wyre Forest District **[LPP06]**. Option 3 included land within the proposed Kidderminster Eastern Extension.
- 3.1.6 The Council has provided consideration of all site options and clear reasons why reasonable alternatives sites have not been taken forward for allocation **[SSP01a]** and reasons why many parts of the District would not be suitable for further large-scale development **[SD04/SSP01]**.
- 3.1.7 The spatial strategy is considered deliverable within the plan period to 2036.

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?

- 3.1.8 Potential impacts on the natural environment, landscape, infrastructure, flood risk, air quality and other matters have been considered through evidence produced by the Council. Site specific issues and mitigatory measures, where necessary, are set out within site specific policies.
- 3.1.9 In respect of OC/6 and OC/13N, further evidence has been provided by TW to consider site constraints and opportunities. The Development Framework Plan has evolved through collaboration with WFDC officers and a range of other stakeholders.

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Further information is set out through representations submitted to the Regulation 19 consultation by TW.

3.1.10 It should be noted that likely significant effects in respect of OC/6 and OC/13N have been considered through the formal EIA Screening and Scoping process.

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?

3.1.11 Whilst TW recognises that brownfield opportunities exist within Kidderminster, these opportunities are finite and following successful regeneration of many of these sites in the past 10 to 20 years, the role that these sites can play in viably delivering development requirements has significantly diminished.

3.1.12 It is noted that 38 of the 58 proposed allocations relate to brownfield land. In addition, the Council maintains an up to date Brownfield Land Register. Therefore, it is considered that the Local Plan makes as much use as possible of previously developed land, recognising that greenfield release is necessary to achieve the growth requirements. This is evidenced through the HELAA [HOU04].

E) Does it promote the development of a good mix of sites for new homes?

3.1.13 A range of allocations have been identified to support the delivery of homes in line with the identified housing requirements. Allocations range in size to support the delivery of under 5 dwellings to the two strategic extensions associated with Kidderminster that would deliver approximately 1,400 dwellings each. The proposed allocations also provide for a good geographical coverage across the District, with development dispersed in line with the identified settlement hierarchy to achieve sustainable patterns of growth.

3.1.14 In line with the requirements of the NPPF [NPPF 2019 Para. 68], the Local Plan identifies, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.

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3.1.15 With a broad range of allocations identified across all sustainable settlements, the Local Plan promotes a good mix of sites to support the delivery of new homes in line with the Council's housing trajectory.

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?

3.1.16 The Local Plan proposes, through Policy 8A, to achieve a minimum average density of 35dph on greenfield sites within sustainable town centres. The policy also provides an element of flexibility to ensure new development reflects local character, which may be at a lower or higher density depending on the nature and location of the proposal. This is supported by Taylor Wimpey Strategic Land as 'sound.'

3.1.17 Land East of Offmore (OC/6) and Stone Hill North (OC/13N) will make effective use of land by providing new homes at a net density of 40 dwellings per hectare alongside significant new green infrastructure and community facilities.

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

3.1.18 TW has worked collaboratively with officers at WFDC, WCC and other infrastructure providers to determine the required infrastructure to support the delivery of OC/6 and OC/13N. These discussions have informed the Development Framework Plan including the location of the community hub to allow for the early delivery of a new primary school, potential doctor's surgery and other community facilities.

3.1.19 The Kidderminster East FVA **[ED9A]** makes an assumption of £29m in S106 obligations to support the delivery of infrastructure in a timely manner, recognising that this represents the worst-case scenario.

3.1.20 Further work will be carried out to inform a hybrid application to determine the appropriate obligations to mitigate the impact of the development, particularly in respect of off-site transport infrastructure. Triggers within a S106 that accompanies the hybrid application will ensure necessary infrastructure to mitigate the impact of the proposals will be delivered in a timely manner.

H) Has the plan been adequately informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development?

3.1.21 The Duty to Co-operate Statement and appended Statements of Common Ground provide confirmation that Wyre Forest District Council is not required to accommodate any unmet development needs for neighbouring LPAs. In addition, there is no published evidence that demonstrates WFDC is unable to meet its own development needs within its own administrative boundaries.

3.1.22 It should be noted that, in respect of housing markets, Wyre Forest District is relatively self-contained, with neighbouring South Staffordshire District, Dudley and Bromsgrove lying within the Greater Birmingham and Black Country Housing Market Area, Malvern Hills and Wychavon forming part of the South Worcestershire Housing Market Area and Shropshire representing a further self-contained housing market area.

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]

3.2.1 The Council recognises the need to release land from the Green Belt in order to meet the identified housing needs and other development requirements across the Plan period. It is noted that the strategic allocation on the eastern edge of Kidderminster urban area is identified as an area to be removed from the Green Belt. This is supported by TW as 'sound.'

3.2.2 A Strategic Review of the Green Belt (September 2016) **[GB01]** prepared by Amec Foster Wheeler forms part of the Local Plan Review evidence base. The Green Belt Review assesses a number of parcels of land against the five purposes of the Green Belt as set out within the NPPF.

3.2.3 Sites are identified as either making a 'significant contribution', a 'contribution' or a 'limited contribution' to the Green Belt purposes.

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- 3.2.4 The exceptional circumstances for releasing land from the Green Belt of increased housing demand coupled with a reduced level of brownfield land opportunities and a tightly drawn Green Belt boundary restricting the ability to deliver sustainable growth, are endorsed by TW.
- 3.2.5 The NPPF, at paragraph 138, is clear that when reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. Kidderminster is the most sustainable location for growth within the District and the town is completely enveloped by Green Belt. Whilst brownfield sites may represent development opportunities within the existing urban area, this source of supply is diminishing or becoming increasingly difficult to bring forward for development due to identified barriers, therefore Green Belt release is necessary to support the sustainable growth of the town and to ensure identified issues and objectives are met within the plan period.

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

- 3.2.6 The Council's approach to Green Belt compensatory improvements is set out in the Green Belt Topic Paper **[ED20 Chapter 9]**. This strategic approach to compensatory improvements is supported, including the proposals for Stour Valley Country Park.
- 3.2.7 In respect of land east of Kidderminster, the current opportunities for existing residents to access to the countryside between Comberton Road and Birmingham Road are restricted to a single PRoW which links Kidderminster with a wider network of paths around Harvington. The proposed Kidderminster Eastern Extension proposes a comprehensive network of green infrastructure (approximately 50% of the OC/6 and OC/13N) linking the whole of the eastern edge of Kidderminster to the PRoW network, including the provision of direct links to the long-distance Monarchs Way.
- 3.2.8 As part of the green infrastructure network provided, approximately 12 hectares will be retained within the West Midlands Green Belt. New green infrastructure will provide new walking and cycling routes providing new recreational access to the Green Belt.
- 3.2.9 The proposal will provide a net gain in biodiversity, including opportunities for new woodland planting (broadleaved and wet woodland) and the creation of neutral

grassland habitat within the green infrastructure network retained within the Green Belt.

- 3.2.10 This development proposal offers the opportunity to provide extensive public access to the countryside where there is currently limited access. In addition, the extensive green infrastructure provision will result in a net gain to biodiversity including opportunity for habitat creation (including woodland and acid grassland) which will provide improved habitat connectivity. Therefore, it can be demonstrated that the proposed allocation would assist in providing adequate compensatory improvements to the 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?

- 3.3.1 The Council has determined its housing requirement to be 276 dwellings per annum, which totals 5,520 dwellings over the plan period. This is supported by TW as a minimum housing requirement. The growth requirements set out in the Local Plan are justified, having regard to the spatial planning considerations outlined above. These spatial planning considerations have been informed by 'sound' evidence including Sustainability Appraisal [**SD04**] and consideration of viability.