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Wyre Forest District Local Plan 2016 - 2036 Examination
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Hearing Statement

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

On Behalf Of:
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1.0 MATTER 3: OVERALL SPATIAL STRATEGY, THE GREEN BELT AND THE OVERALL HOUSING AND EMPLOYMENT LAND REQUIREMENTS

1.1 This Hearing Statement has been prepared by Harris Lamb Planning Consultancy (“**HLPC**”) on behalf of Barratt Homes West Midlands (“**Barratt Homes**”) in response to the Inspector’s Wyre Forest Local Plan examination Matter 3 questions. The Inspector’s questions are set out below, alongside Barratt Homes’ response.

Q3.1 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:

Meeting the development needs from neighbouring areas

1.2 The emerging Local Plan does not make any provision to meet the unmet housing needs from neighbouring authority areas. Emerging Local Plan (SD01) Policy 6A – Development Needs 2016-2036, advises that due consideration will be given through an early review of the Plan to the housing needs of neighbouring authorities where it has been clearly established through the Local Plan review process that these needs must be met within Wyre Forest District. Footnote 7 makes reference to the fact that the Black Country Authorities (Walsall, Wolverhampton, Sandwell and Dudley) are currently preparing a joint replacement Local Plan.

1.3 The Black Country Core Strategy Review Issues and Options Consultation document (June 2017) identifies a need for around 78,000 dwellings in the Black County up to 2036. It is estimated that sites within the Black Country urban area can accommodate 56,000 dwellings, leaving a shortfall of 22,000 dwellings. It is advised that 10,500 of these dwellings could be accommodated on employment land where businesses currently operate. However, there is also a need to accommodate 300ha of employment land

outside of the urban area in the Green Belt, and if more employment land is developed for housing, it will also need to be replaced.

- 1.4 The Black Country authorities will, therefore, have to review options to release land in the Black Country Green Belt for development, and work with neighbouring authorities to distribute the housing and employment land shortfall. As such, we welcome the reference in the emerging Plan to a potential early review. The position that the Black Country Authorities find themselves in, could result in Wyre Forest having to identify an increased amount of land for housing in the Local Plan review process.

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?

- 1.5 As noted by the Inspector in the 'Initial Queries and Points for Consideration by the Council (ED6)', the emerging Plan does not include a policy that confirms the distribution and quantum of development that is expected in the three main settlements and in the rural areas. The proposed amendment to the Plan to address this matter, referred to in ED7, is supported.

- 1.6 Table 6.0.2 of the emerging Plan identifies the various sources of housing land supply that are expected to deliver the Plan's housing requirement. The Table includes information on the total capacity of the allocations proposed at each settlement and in the rural area. Table 6.0.2 also confirms the number of completions, dwellings under construction, and commitments not started since the beginning of the Plan period. However, the distribution of these sources of supply is not identified. The emerging Plan does not, therefore, clearly indicate the distribution of the entire housing target. However, Table 6.0.2 does suggest that it is heavily skewed towards Kidderminster. Table 1 below is based on emerging Local Plan Table 6.0.2 and shows the distribution of development between the main towns and the

rural areas, excluding completions, dwellings under construction and commitments.

Table 1 - Distribution of Allocations

Location	No. of dwellings	Proportion
Strategic Allocation - Lea Castle Village	1,400	27%
Strategic Allocation - Kidderminster Eastern Urban Extension	1,440	28%
Kidderminster Town	990	19%
Stourport-on-Severn	984	19%
Bewdley	225	4%
Rural Settlements	115	2%
Total	5,154	100%

1.7 The two Strategic Allocations are located next to Kidderminster. As such approximately 74% of the allocated housing target is within, or adjacent to, Kidderminster. Just 19% of the housing requirement is directed to Stourport-on-Severn.

1.8 The emerging Local Plan advises that Wyre Forest has a total population of 100,600 people (paragraph 2.2 – 2.7) distributed as follows:

Table 2 – Distribution of Wyre Forest Population

Location	Population	Percentage
Kidderminster	56,538	56%
Stourport-on-Severn	20,542	20%
Bewdley	9,000	9%
Rural Area	14,520	14%
Total	100,600	100%

1.9 As the 'Main Town' we support Kidderminster being the focus of development and we support the quantum of development directed towards the town in numerical terms. However, Stourport on-Severn receives a disproportionately small percentage of the housing requirement compared to its population size. That being the case, should a policy be included in the Plan that identifies the overall distribution of the housing requirement, it

should advise that the quantum of development directed towards Stourport-on-Severn is a minimum that is expected to be exceeded.

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

- 1.10 We are generally supportive of the evidence base that underpins the Plan. As detailed in our Matter 2 Hearing Statement, we are of the opinion that the minimum housing needs figure is robustly evidenced. In addition, as detailed in our response to Q3.3, the emerging Plan identifies a supply of housing sites in excess of the minimum housing needs figure. This is also supported. This additional flexibility will help to ensure that the minimum housing needs figure is met.
- 1.11 We are of the view that the evidence base documents, including the Site Selection Paper (SSP01), the Housing Topic Paper (ED3) and the Housing and Economic Land Availability Assessment 2019 (“**HELAA**”) (HOU04) demonstrate that the minimum housing requirement is deliverable.
- 1.12 However, as referred to above, Stourport-on-Severn receives a disproportionately small proportion of the housing allocations compared to its population. As such, the emerging Plan should make it clear that additional development will be supported in Stourport-on-Severn on appropriate sites, or through increased densities on the proposed allocations where appropriate.

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?

- 1.13 Barratt Homes are the promoters of proposed allocation AKR/14 – Peal Lane, Areley Kings. The potential implications of the development of this site on the natural environment, landscape, infrastructure, flood risk, air quality

and other matters have all been properly assessed in allocating the site for development. We comment on this matter further in our Matter 6 Hearing Statement.

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?

1.14 Barratt Homes support the allocation of suitable under-utilised land and buildings and suitable brownfield sites for residual development. However, it is clear that the housing requirement cannot be met without greenfield land being allocated for development.

1.15 The HELAA assesses urban and rural brownfield and greenfield opportunities. The suitable brownfield development opportunities identified by the HELAA are reflected by the allocations in the emerging Plan. The Site Selection Paper concludes that there are not enough suitable brownfield sites for development to meet the housing requirement (paragraph 3.20). We support this conclusion. It is, therefore, necessary for the emerging plan to allocate greenfield land adjacent to existing settlements for development to meet the housing requirement.

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

1.16 Yes, a range of housing sites are identified in the emerging Local Plan. A notable proportion of the housing requirement is directed to two large scale Strategic Allocations. These allocations will provide a steady source of housing land supply over a sustained period of time. The Strategic Allocations are complimented by a series of medium sized and smaller allocations within, and adjacent to, the three main settlements that can be brought forward independently of one another. It is expected that the medium sized and smaller sites can be brought forward for development promptly.

- 1.17 This approach is consistent with the provisions of the Framework. Paragraph 72 of the Framework confirms that the supply of a large number of new homes can often be best achieved through planning for large scale development, such as significant extensions to existing villages or towns, provided they are well located and supported by necessary infrastructure. Paragraph 68 of the Framework confirms that small and medium sized sites can make an important contribution to meeting the housing requirements of an area and are often built out relatively quickly.
- 1.18 As detailed in our Matter 6 Hearing Statement, Barratt Homes are preparing a full planning application for the Pearl Lane, Areley Kings (AKR/14) allocation. Pearl Lane is a greenfield urban extension site that will provide high quality residual development with a range of different property types.

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?

- 1.19 Yes. The number of dwellings that are expected to be developed on the various allocations, and the site sizes, are identified in the Site Allocation policies in the emerging Plan (Policies 33 to 36). We are of the view that the corresponding densities are generally appropriate, having regard to on site infrastructure requirements, such as Green Infrastructure and Public Open Space.
- 1.20 In terms of proposed allocation AKR/14 – Pearl Lane, Policy 33 advises that the site is 15.09 ha in size, and it has an indicative capacity of 250 dwellings. Once an allowance is made for 40% Green Infrastructure in accordance with the requirements of emerging Local Plan Policy 14, this suggests that the site will be developed at a net density of just 27dph. However, paragraph 33.9 of the emerging Plan confirms that a greater number of units can be accommodated on the Pearl Lane allocation subject to the capacity of Local Schools and the implications of the Roman Villa that is potentially located on part of the site. These matters have both been assessed in the preparation

the planning application and can be addressed. As such, a greater number of units will be delivered on the Pearl Lane site optimising the density of development. Our Matter 6 Hearing Statement outlines the changes we believe are necessary to the Pearl Land allocation policy to clarify this matter.

- 1.21 The emerging Plan proposes the allocation of a variety of different development sites, ranging from town centre brownfield regeneration opportunities to rural greenfield sites, that are very different in character. As such, densities will vary across the allocations in the emerging Plan and this must be reflected in the emerging Plan's policies and the capacity of each site. Accordingly, Policy 8A 'Housing Density and Mix', recognises that the density of schemes must be sympathetic to the development context.
- 1.22 It is noted that policy 8A does not include a density requirement for brownfields sites. This approach is supported, as the density achieved on brownfield sites will be reflective of the character of the area and site constraints.
- 1.23 We support the reference in Policy 8A to greenfield development sites within town centres having an "average" density of 35 dph, unless local characterises indicate otherwise. This is a sensible starting density. Policy 8A should, however, clearly reference the fact that local characteristics could result in densities going up, as well as down.
- 1.24 It is imperative that the density assumptions in the Plan are not unrealistically high. If density assumptions are unrealistically high, it will result in the proposed allocations delivering fewer dwellings than they are allocated for. This will in turn mean that the housing requirement in the Plan may not be met. We are of the view that the density assumptions in the emerging Plan are realistic and should not be adjusted upwards.

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

1.25 As referred to in our response to Q3.1c, Barratt Homes are the promoters of proposed allocation AKR/14. All necessary infrastructure to serve this development can be provided in a timely manner. As detailed in our Matter 6 Hearing Statement, pre-application discussions have taken place between Barratt Homes and the Council regarding the development of this site, including how onsite and offsite infrastructure will be delivered. A planning application is expected to be submitted shortly.

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

1.26 Yes. The Green Belt Topic Paper (ED2) advises that during the preparation of the Local Plan the Council held discussions with neighbouring authorities regarding their ability to help accommodate Wyre Forest's development requirements. However, this is not possible as the neighbouring authorities are also having to remove land from the Green Belt to meet their own growth requirements. This position is confirmed in the Statements of Common Ground with South Staffordshire (SD10e), the Black Country authorities (SD10f) and Birmingham (DS10g). Indeed, as referred to above, it is quite possible that the Black Country authorities will have to ask Wyre Forest to help accommodate a proportion of their housing requirement in future versions of the Local Plan.

Q3.2 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]

1.27 As referred to in our Matter 2 Hearing Statement, the minimum housing requirement in the emerging Plan is appropriate. The Council's ("**HELAA**")

(HOU04) and Site Selection Paper (SSP01) confirm that there are insufficient sites available to meet the housing requirement without Green Belt land release.

1.28 The emerging Plan seeks to maximise development opportunities on non-Green Belt land. However, it is evident that non-Green Belt development opportunities are limited. The safeguarded sites will only be able to accommodate a limited amount of development. A large proportion of the emerging housing allocation has had to be accommodated on land currently in the Green Belt. If the subsequent version of the Local Plan has a similar or greater housing requirement, which is highly likely, a new Green Belt review will need to be undertaken to identify additional development sites. This approach is not in accordance with the requirements of paragraph 136 of the Framework, that requires Green Belt boundary reviews to endure beyond the plan period. It also emphasises the requirement to make the best use of the existing non-Green Belt land resource in the District.

1.29 That being the case, in future versions of the Local Plan, it is highly likely that additional land will need to be removed from the Green Belt and allocated for development. In addition, consideration should be given to the extension of Stourport-on-Severn beyond Wyre Forest's administrative boundaries into Malvern Hills District, adjacent to the proposed Pearl Lane allocation as this land is not within the Green Belt.

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

1.30 No comment.

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?

- 1.31 As detailed in our Matter 2 Hearing Statement, we are of the view that the 'minimum' housing requirement of 5,520 dwellings (276 dpa) is robust. There is a significant amount of supporting evidence to suggest that this figure should be treated as a minimum.
- 1.32 The emerging Plan has identified an overall housing land supply of circa 6,365 dwellings, approximately 15% above the proposed housing need of 5,520 dwellings. This approach is supported. It is not uncommon for some Local Plan allocations to not deliver as expected. Detailed site survey work undertaken in the preparation of planning applications may identify constraints that delay delivery or reduce the number of dwellings on site. Changes to the economy could slow down the number of dwellings constructed. Landowners aspirations may change. It is, therefore, entirely appropriate for the emerging Plan to identify sites to deliver a greater number of dwellings than the minimum housing needs figure.
- 1.33 Furthermore, the Green Belt wraps around the entire Kidderminster urban boundary and large parts of Stourport-on-Severn and Bewdley. That being the case, if a five-year housing land supply shortfall occurs, paragraph 11.d of the Framework will be of limited use as a tool in delivering additional development outside of settlement boundaries to boost the supply of housing. Allocating land over and above the minimum housing needs figure will help prevent this occurring.
- 1.34 In addition, the minimum housing needs figure is not sufficient to meet the affordable housing requirements of the District (as detailed in our Matter 2 Hearing Statement). Increasing the supply of housing land will help address the affordable housing shortfall by increasing the amount of affordable housing provided through planning obligations.

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

1.35 No comment

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