

Gladman Hearing Statement

Wyre Forest Local Plan Review Examination

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



November 2020

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?

b) is it based on adequate evidence, consistent with national planning policy, and is it deliverable within the Plan period? Wyre Forest District Local Plan 2016-2036: Matters and Questions for the Examination 3

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

1.1.1 Gladman consider that it would be reasonable for the Council to consider further housing allocations in sustainable settlements such as Kidderminster, Stourport-on-Severn and Bewdley.

1.1.2 The apportionment of residential allocations to Bewdley & the surrounding rural area is less than its proportion of resident population. Within the District, the rural areas have the most expensive house prices, many local people are priced out of the market. The 2019 NPPF advocates that *"to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services"* (para 78).

1.1.3 Gladman consider this approach to be overly restrictive and remind the Council of the need for a degree of flexibility and contingency in case the planned developments do not come forward as envisaged and in order to be able to rapidly respond to changes in circumstances through the course of the plan period.

1.1.4 Bewdley is a sustainable settlement with a wide range of key services and facilities including a Co-op, Tesco, post office, doctors surgery, petrol station, two primary schools and a secondary school. Gladman reiterate the view that Bewdley can play a larger role in housing

delivery than that which is currently being planned for and additional allocations and flexibility for further growth should be included in the plan.

- 1.1.5 Gladman also consider it prudent for the Local Plan to include a review policy, however this would need to be clear, easily understandable and effective, by setting achievable targets for the completion of a review. The Review policy within the Local Plan needs to have specific triggers and timescales in order to ensure that it is a meaningful policy mechanism. The triggers for the review need to be meaningful, have teeth and contain an end date that is in the control of the Council. The policy should also include consequences for failing to meet the target dates.

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

- 1.1.6 It is noted that the above policy seeks to amend Green Belt boundaries to enable development to the north of Kidderminster to enable the Lea Castle Village development and the eastern edge of Kidderminster urban area together with smaller scale Green Belt releases in the market towns and villages.

- 1.1.7 Whilst Gladman do not object to the principle of releasing land from the Green Belt which no longer meets the purposes of Green Belt as defined by national policy, we do not consider the evidence provided by the Council is sufficient to justify the decisions arrived at. Indeed, to pass such a high bar in terms of demonstrating 'exceptional circumstances' the evidence which underpins Green Belt release must be substantive and detailed.

- 1.1.8 The Government's position on Green Belt release has recently been reaffirmed in the Revised Framework. Paragraph 137 states:

- 1.1.9 *'Before concluding that exceptional circumstances existing to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*

- 1.1.10 *Makes as much use as possible of suitable brownfield sites and underutilised land;*

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- 1.1.11 *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; and*
- 1.1.12 *Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.'*
- 1.1.13 As previously stated, Gladman do not in principle object to authorities undertaking Green Belt release, however, the requirements of the Revised Framework set out above is clear that the evidence which underpins the plan and the decisions taken has not occurred.
- 1.1.14 Gladman originally instructed FPCR to undertake a Green Belt Review which provided a thorough baseline desktop and site based analysis of the twelve sites identified within *Green Belt Review – Part II Sites* report for Kidderminster.
- 1.1.15 Following publication of the Council's updated 2018 Green Belt Review evidence base, Gladman requested FPCR to update this work and to provide a review of the sites identified within the update. This update was provided in our pre-submission representations.
- 1.1.16 It is apparent that there are inconsistencies when comparing the findings of the report with the recommendations then made for parcels which should be brought forward for draft allocation.
- 1.1.17 Indeed, the Council's Green Belt Review comments that sites WFR/WC/32 (Lea Castle East) and WFR/WC/34 (Land north of Lea Castle Hospital) are: -
- 1.1.18 *"sites where the impacts are judged to be significant and damaging to the Green Belt, through their likely effect on openness" and are "sensitive gateway sites where even modest development would have a disproportionate effect both on the function of the Green Belt (principally in terms sprawl and effect on setting), but also on the wider perception of openness reflecting their prominence".*
- 1.1.19 Yet this land is now proposed as part of the Lea Castle Hospital allocation.
- 1.1.20 It is therefore unclear why the Council has decided to go against its own evidence base and allocate land which will have a significant impact on Green Belt.
- 1.1.21 The sites which have been assessed in this report make a more significant contribution overall and have been brought forward whilst sites which have been assessed to make a less significant contribution to the Green Belt have not.
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1.1.22 There are also clear opportunities to meet housing needs outside of Green Belt areas. The Revised Framework is clear in its approach that exceptional circumstances must be demonstrated before releasing land from the Green Belt and that all other options for development should be fully explored. Accordingly, Gladman object to the decision to release land from the Green Belt on the basis that it is justified given that alternative options have not been fully explored and no discussion with neighbouring authorities has been undertaken through a SoCG.

3.3 Having regard to the housing and employment need figures and the spatial planning considerations above, is it justified to set 5,520 dwellings¹ (at least 276 dwellings per year) as the housing requirement for the Plan period and at least 29ha as the employment land requirement?

1.1.23 The Council has determined its housing need as 276 dwellings per annum, which totals 5,520 dwellings over the plan period. In our Matter 2 Hearing Statement we set out why we believe the Council could have been more ambitious in their calculation of housing need.