

Wyre Forest District Council Local Development Plan Examination

Statement in relation to Inspector's Matter 3

1.0 This statement has two particular concerns: changes to the Green Belt boundary and specific infrastructure needs which also relate to Matter 6 (iii).

2.0 Green Belt changes

Inspector's Matter 3.1 d) asks of the Plan *"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?"*

Policy 7A of the Plan covers a review of Green Belt designations and para 7.8 states that *"the time has come for the District Council to look beyond the boundaries of its urban areas for sites to meet the District's development needs"*

2.1 As a general point, Kidderminster, like so many of the nation's town centres, is now awash with vacant commercial and retail space. This trend, particularly in relation to retail and office space, has been accelerating during the current pandemic. Most influential observers, such as the British Retail Consortium and the British Chambers of Commerce, believe that this "trend" is here to stay. It must therefore be right to question the need to remove any land from Green Belt designation without first ensuring that Town Centres are appropriately transformed to meet undisputed housing shortages. In this respect it could be argued that WFDC's Development Plan, given its long period of gestation, is already out of date.

2.2 The introduction to Policy 7 reminds us that the stated aims of the Green Belt include the protection of open countryside and prevention of urban sprawl and the policy itself states that development *"will not be permitted unless very special circumstances exist"*. As regards the specific proposals for Bewdley, it is particularly disappointing to note that of the 4 housing development sites designated, 3 require such release. Furthermore, one of the very important roles of the Green Belt is that it provides physical separation of our three towns. The Plan pays insufficient regard to the NPPF requirement for maintaining Green Belts and this key function. Removal of the Green Belt on the Wribbenhall side of the A456 Bewdley By-Pass will seriously weaken this role. With the sites that have now been allocated for housing on the Wribbenhall side and, as para 35.5 reminds us, with Planning Approval granted back in 2016 for a *"hotel, conference centre and waterpark"*, this presents a radical change in the perceived rural setting of our towns, giving a much more urban feel and thereby a significant weakening of the Green Belt that will remain on the Safari Park side of the road only. If no alternative sites are available and these sites must be used to meet the required local housing need then effective measures should be incorporated in development proposals to mitigate this loss including additional tree screening and landscaping, reduced size, density and types of development as well as appropriate designs and choice of materials.

3.0 Infrastructure Needs

Inspector's Matter 3.1 c) asks *"have the potential impacts on the infrastructure been assessed adequately, and does the Plan provide for mitigatory measures where necessary?"*

3.1 With regard to Highways, Policy 34 includes no mention of traffic management within the Policy itself. The introductory paragraph of the reasoned justification simply refers to *"a new access onto Stourport Road."* The Inspector's attention is drawn to **Appendix 1** of this Statement which demonstrates that residents from along Stourport Road and the Housing Estate (Sandbourne Drive etc) adjacent to proposed development site WA/BE/1 have been experiencing serious traffic concerns even before the effect of the new residents' car journeys associated with a new, intense housing scheme is felt. Whilst these minutes reflect the views back in the summer of 2018, this Residents' Group was actually formed as far back as 2015 (ie pre-consultation on the WFDC Plan) as a vehicle with which to bring these concerns to the attention of the two local Headteachers, local Councillors, Police etc. Unfortunately no remedial action has ever been taken and the serious congestion problems, particularly around the schools' drop-off and pick up times have only got worse. The 3 photos also appended to this Statement, taken very recently up and down the Stourport Road from the entrance to Bewdley High School (only approximately 100 metres from WA/BE/1) clearly demonstrate this. Attention is drawn to the cyclist who apparently felt sufficiently threatened by the sheer volume of traffic to take to the pavement, thereby incidentally, representing a further danger to the school children and other pedestrians.

3.2 Given the particular residents' concerns above, which, as noted, did involve WFDC representatives, it was surprising that there was only one reference to Bewdley in the infrastructure Delivery Plan, cited as the WFIDP in the Plan's Evidence Base. This states at section 3.1.6 *"A key issue in Bewdley is the Air Quality Management Area (AQMA) at Welch Gate. This is a long standing issue which has been very difficult to resolve due to the historic nature of Bewdley. Additional development within Bewdley will need to be carefully managed and will need to ensure that appropriate mitigation is provided to prevent any further deterioration in air quality. Additionally, the lack of parking capacity located on the east side of the town forces traffic to travel through and close to the AQMA. **Additional car parking on the east side would benefit the air quality and would also serve Severn Valley Rail Station"***

3.3 Not only therefore does the proposed designation of WA/BE/1 as a housing site exacerbate existing serious traffic congestion and which is already hazardous to the adjacent secondary and primary school children, it also represents a significant missed opportunity for the additional east side car parking highlighted above. Indeed, Para 13.6 in the Plan tells us that *.."to tackle traffic congestion, significant changes in travel patterns and travel behaviour are necessary on a local neighbourhood and District wide level. This will require investment in transport infrastructure and services, and the adoption of policies that ensure the **closer integration of land use and transportation planning.**"* A much more holistic and integrated approach to developing the (AQMA , tourism etc) needs of Bewdley and the wider District would see site WA/BE/1 retained for the WFIDP's proposed east side

parking benefits (as referenced in 3.2 above) and/or community and recreational use. This would also address the lack of facilities and shortage of developable land in the town centre including the need for adequate long stay car and coach parking. If this site is to be developed for housing, then it becomes imperative that other sites on the river side of the road, i.e. the schools, Leisure Centre and piece of land up to the Bypass Bridge be earmarked for community and recreational use. In the past there has been talk of siting a theatre at the school for combined community use. The point here is that a comprehensive assessment of long term community and recreational need is required before land in this area is committed for housing and that in any event mitigating measures should be included with any new housing proposal to offset the current and potentially worsening traffic and parking issues. These measures could include for example: -

- a) The establishment of a long stay car park (ie as an alternative to using WA/BE/1 for this purpose) for the town including coach parking, preferably with toilet facilities that might also be used for the school, sports centre, tennis club and SVR visitors.
- b) 20mph zone from the By-Pass through to the town centre. Currently the schools will not encourage their pupils to cycle to school because of safety concerns on approach roads. This is a very sad state of affairs for a small town like Bewdley which ought to be fully supporting the National Campaign for more active lives.
- c) Improvements to the riverside walks from the town through to the By-Pass bridge with easy access points from Stourport Road
- d) Investigation of a possible relocation of the Tennis Club to a new site close to the sports centre to share in the use of community facilities. The Club's existing site could therefore become available for housing.
- e) Increased use of public transport, including exploring the possibility of shuttle buses running from the Bewdley estates through to the Wribbenhall estates calling in the town centre and the schools. All improvements to infrastructure should encourage walking, cycling and alternative access arrangement to the schools and other facilities to reduce the impact of car use, congestion and pollution. All of this, it would seem, is directly in line with other policies in the Plan, namely Policy 5 Overarching Sustainable development Principles, Policy 9 Health and Wellbeing and Policy 13 Transport and Accessibility.

3.4 Given all such considerations it is submitted that the Plan, once Examined should ensure that appropriate priority be given to MA/12.1 in The Table of Modifications document (SD12 in the Examination Library) which states that “.. *planning obligations will be required to fund infrastructure projects that are directly related to specific development, including but not limited to affordable housing, transport, green infrastructure, education, health and other social infrastructure.*”

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