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**Wyre Forest District Local Plan 2016 - 2036 Examination**  
**Town and Country Planning Act 1990**  
**Planning and Compulsory Purchase Act 2004**  
**Localism Act 2011**

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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:**  
**Taylor Wimpey West Midlands (ID1126171)**

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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 Taylor Wimpey West Midlands (“**Taylor Wimpey**”) in response to the Inspector’s Matter 3 questions. The Inspector’s questions are set out below, alongside Taylor Wimpey’s 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 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 through provision in Wyre Forest. 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 consider accommodating 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 different settlements and the rural area. The proposed amendment to the Plan referred to in ED7 to address this matter 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 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 area, excluding completions, dwellings under construction and commitments.

***Table 1 - Distribution of Allocations***

<b>Location</b>	<b>No. of dwellings</b>	<b>Proportion (rounded)</b>
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%
<b>Total</b>	<b>5,154</b>	<b>100%</b>

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**

<b>Location</b>	<b>Population</b>	<b>Percentage (rounded)</b>
Kidderminster	56,538	56%
Stourport-on-Severn	20,542	20%
Bewdley	9,000	9%
Rural Area	14,520	14%
<b>Total</b>	<b>100,600</b>	<b>100%</b>

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 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 Taylor Wimpey are the promoters of proposed allocation MI/38 – School Site Coniston Crescent. The potential impact on the natural environment, landscape, infrastructure, flood risk and air quality and other matters have all been properly assessed in allocating this 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 We are of the view that the emerging Local Plan allocates as much suitable brownfield land for development as possible. 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. We support the conclusions in the Site Selection Paper that there are not enough brownfield sites to meet the housing requirement (paragraph 3.20).

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

1.15 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 will provide a steady source of housing land supply over a sustained period of time. These are complimented by a series of smaller allocations adjacent to the three main settlements that can be brought forward independently of one another.

1.16 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, provide 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.

1.17 Taylor Wimpey are the promoters of proposed allocation MI/38 – School Site Coniston Crescent. This site is entirely deliverable. Its allocation is supported by adequate evidence. A planning application is currently being

prepared that will be submitted early in the new year We comment on this matter further in our Matter 6 Hearing Statement.

***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?***

- 1.18 Yes. The number of dwelling that are expected to be developed on the various allocations, and the size the allocated sites, 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 appropriate, having regard to on site infrastructure requirements, such as Green Infrastructure and Public Open Space (we comment further on the Green Infrastructure Policy in our Matter 10 Hearing Statement).
- 1.19 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.
- 1.20 We support the reference in Policy 8A to greenfield development sites within town centres having an average density of 35 dph, unless local characteristics indicates 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.
- 1.21 It is imperative 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?***

- 1.22 As referred to in our response to Q3.1c Taylor Wimpey are the promoters proposed allocation MI/38 – School Site Coniston Crescent. 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 are taking place between Taylor Wimpey and the Council regarding the development of this site, including how onsite and offsite infrastructure will be delivered.

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

- 1.23 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 Forrest'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 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 version 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]***

- 1.24 Yes. 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.
- 1.25 Taylor Wimpey are the promoters of proposed allocation MI/38 – School Site Coniston Crescent. The emerging Plan proposes the removal of this site from the Green Belt and its allocation for residential development. As detailed in our Matter 6 Hearing Statement, there are exceptional circumstances that support the removal of this site and its allocation for residential development regardless of the need to remove land from the Green Belt to meet development requirements. The Trust needs to generate significant funds to pay for essential repair work to the school. The only way this can be achieved is to sell surplus land in their control for development. This is an exceptional circumstance in its own right.

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

- 1.26 Yes, we are of the view that the compensatory measures outlined in the Green Belt Topic Paper (ED2) are appropriate. The compensatory measures include the creation of a new Country Park on part of the former Burlish Golf course, that lies to the north of Stourport on Severn. It will create new leisure opportunities to the public, increase public access to the Green Belt and increase wildlife value in this location. It is also noted that the Woodland Trust are in discussions with the Council regarding the planting of c30,000 trees on this site. The proposed Country Park is located to the north of the Green Belt allocations at Stourport on Severn.

***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?***

- 1.27 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.
- 1.28 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 not to 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 that the minimum housing needs figure.
- 1.29 Furthermore the Green Belt wraps around the edge of all of Kidderminster 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.
- 1.30 In addition, the minimum housing needs figure is not sufficient to meet 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 though planning obligations.

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

1.301 No comment

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