



# MATTER STATEMENT

in respect of  
**Matter 3 – Overall spatial strategy, the Green Belt and the  
overall housing and employment land requirements**

on behalf of  
**Seven Homes Ltd – Representor ID: 1192551**

26 November 2020  
Client Reference: RCA716b

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## 1. INTRODUCTION

- 1.1. This Matter Statement has been prepared in response to the Inspector's Matters Issues and Questions in relation to the overall spatial strategy the Green Belt and the overall housing and employment land requirements. This Statement has been prepared on behalf of Seven Homes by RCA Regeneration Ltd.
- 1.2. I can confirm that RCA Regeneration Ltd would wish to speak at the Hearing sessions in connection with Matter 3 on behalf of their client Seven Homes.
- 1.3. The following section sets out our responses to the Inspector's questions.

## 2. MATTER 3 – OVERALL SPATIAL STRATEGY, THE GREEN BELT AND THE OVERALL HOUSING AND EMPLOYMENT LAND REQUIREMENTS

2.1. This section aims to respond to the Inspectors questions in regard to the above Matter.

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?

2.2. We refer to our earlier points raised in response to the SA at Matter 1 and would reiterate that we do not consider that this plan takes any account of unmet need within the neighbouring authority areas.

2.3. Further, the evidence on releasing Green Belt, in our view has been 'retrofitted' to suit a politically-driven spatial strategy that ignores sustainability principles at times. Whilst we consider the approach of incorporating as much brownfield land to be laudable aim, it is clear that these sites will not deliver the much-needed planning gain necessary to offset their impact. To that end, there is a considerably large infrastructure funding 'gap' which will remain very much that without the addition of further allocations on viable greenfield sites that will not only boost significantly the supply of housing but assist in delivering much needed strategic transport infrastructure and affordable housing.

2.4. Further, we consider there to have been a major missed opportunity to work together to deliver strategic infrastructure improvements with neighbouring Bromsgrove – particularly as two major routes that connect Wyre Forest to the strategic road network run through Bromsgrove District, where there are already serious problems with extensive congestion and air quality management. We consider this to be a majorly missed opportunity which potentially renders the plan unsound in their duty to cooperate.

Q3.1a In particular, 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 of development?

2.5. We have noted that the overall spatial distribution and quantity of the proposed development in the District is not expressed in a single policy which effects limits the effectiveness and readability of the Plan as a whole. We understand that the Council proposes a Main Modification (MM) to introduce a spatial development policy, although the details of this are yet to be reviewed and published.

2.6. The Plan's spatial vision focuses on Kidderminster as the strategic centre and Stourport on Severn and Bewdley as market towns to which we do not disagree. The apportionment of housing development focuses 74.5% of allocations in Kidderminster and on two strategic sites adjacent to Kidderminster. However, this focus may not meet the needs of communities outside of Kidderminster town itself.

2.7. In 2016, the resident population was 56,538 in Kidderminster, 20,542 in Stourport on Severn and 13,802 in Bewdley and the surrounding rural area. Within the District, the rural areas have the most expensive house prices, with many local people priced out of the housing market. We consider that Stourport on Severn (as a market town) should be attributed a larger proportion of housing allocations. The site at Bournewood Nurseries represents a good opportunity for a well-

located modest residential allocation to Stourport. It occupies a sustainable location on the edge of the town adjoining the current settlement boundary. Whilst it would require the release of land from the Green Belt, the planning gains associated with the redevelopment of the site would far outweigh the benefits of retaining the land within the Green Belt in this location. Allocation of sites such as that at Bournemouth Nurseries would add to the overall deliverability of the plan, increase the overall housing target and boost the delivery of affordable housing in general, thereby ensuring that the plan is robustly prepared and sufficiently justified against national planning policy.

**Q3.1b In particular, is it based on adequate evidence, consistent with national planning policy, and is it deliverable within the Plan period?**

- 2.8. Viability will be a key issue in determining the soundness of the Local Plan as we have alluded to in previous submissions. In plan-making, viability is inseparable from deliverability. As set out in the 2019 NPPF, the contributions expected from development including the level and types of affordable housing provision required and other infrastructure for education, health, transport, flood and water management and open space etc should be set out in the Local Plan (Paragraph 34).
- 2.9. Furthermore, as stated in the 2019 NPPF, development should not be subject to such a scale of obligations that the deliverability of the Local Plan is threatened (Paragraph 34). The Council's 2017 Viability Assessment (IFT07) showed that brownfield sites and strategic sites were unviable unless policy requirements were flexed, particularly that in relation to affordable housing. The 2018 Viability Assessment Update (IFT06) continues to show brownfield sites as unviable on a full policy compliant basis and 25% affordable housing provision as set out in Policy 8B (see Table 10.11). There are 58 sites proposed for allocation for housing of which 38 are brownfield. The Viability Assessment advises caution in relying on brownfield sites (Paragraph 10.49 of IFT06) and we consider that it is right to do so, knowing the likely abnormal costs associated with developing a brownfield contaminated site. As such, we consider that there is an over-reliance on likely unviable brownfield sites which is another important factor in determining the deliverability of the Plan.

**Q3.1d In particular, 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?**

- 2.10. As alluded to under Q3.1b we consider that the plan is currently over-reliant on potentially unviable brownfield sites. Whilst we consider this a laudable aim of the plan, we are concerned over the likely delivery of the number of brownfield and previously developed sites within the District. As such, we continue to maintain that sites such as the former Bournemouth Nurseries in Stourport on Severn as viable and suitable alternatives to such an over-reliance on brownfield sites coming forward over the plan period. It is already noted and accepted that individual viability cases have been/or are likely to be put forward on the two strategic allocations of Lea Castle Hospital and the Kidderminster Eastern Extension. This would render the delivery of affordable housing and other contributions unlikely due to the larger abnormal costs associated with the delivery of these sites in general.

**Q3.1e In particular, does it promote the development of a good mix of sites for new homes?**

- 2.11. The mix of sites by location is limited. As set out in answers to Questions 3.1a and 3.1b above, most allocations are located in Kidderminster and Stourport on Severn and two major strategic allocations. There are far fewer allocations in Bewdley and Villages in the rural area. There would

appear to be an over-reliance on the allocation of brownfield sites within the Plan which we would inevitably question the soundness of the plan for the deliverability of such sites to come forward, particularly in line with the ambitious housing trajectory set out in ED10A.

**Q3.1g In particular, is there a reasonable prospect that the necessary infrastructure will be delivered in a timely manner to support the planned development?**

- 2.12. We would question this. The necessary infrastructure outlined to deliver the planned development across the District is finely balanced on viability grounds and in particular, strategic highway infrastructure projects have failed to take into account any cooperation with neighbouring authorities (in particular, Bromsgrove District). This could have major implications in the delivery of such infrastructure projects which will be required to be implemented to allow such strategic development to come forward in a timely manner and certainly within the emerging plan period.

**Q3.1h In particular, has the Plan been adequately informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development?**

- 2.13. It is acknowledged that during the preparation of the Local Plan, the Council held various meetings with neighbouring authorities to discuss whether they were able to accommodate any of Wyre Forest District's development needs. No neighbouring authority indicated a willingness to assist because they are either unable to accommodate their own needs and are looking to their own neighbouring authorities to export some of their growth or they are themselves Green Belt authorities.
- 2.14. Indeed as set out in Statements of Common Ground with the Black Country Authorities (SD10f), South Staffordshire (SD10e) and Birmingham (SD10g) there are suggestions that any uplift above the minimum standard methodology LHN in Wyre Forest should be seen as meeting their unmet housing needs. This is unjustified proposition. It is understood that WFDC propose a MM as a pragmatic response to Policy 6A(b) which we understand to state *'as required by the Duty to Cooperate, due consideration will be given, through a future early review of the Wyre Forest Local Plan where necessary and in accordance with the NPPF, to the housing needs of neighbouring local authorities in circumstances when it has been clearly established through the Local Plan process that these needs must be met through provision in the Wyre Forest District area. The review will consider the need for additional growth and plan appropriately for this if the need has been clearly evidenced and justified.'* We would of course express caution of this approach of an early review of the Plan and do not consider that matters such as these should be kicked down the line and that they should be addressed now.

**Q3.2a 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?**

- 2.15. We consider that the Council's approach to Green Belt review and subsequent release has been wholly inconsistent and it is almost impossible to assess whether adequate compensatory measures for Green Belt sites are provided within the plan.
- 2.16. The need for changes to the Green Belt boundary has been successfully established in national planning policy and guidance. This is set out in the 2019 NPPF, where fully evidenced and justified Green Belt boundaries can be altered in "exceptional circumstances" through the

preparation or updating of Local Plans (Paragraphs 136 and 137). In general, we support the findings of the Council's Green Belt Topic Paper (ED20), which justifies the release of Green Belt land for allocation and safeguarding, however, we would comment that further work is required to ensure that the release of sites is sufficient for the purposes of this emerging plan period and beyond to ensure the permanence of the Green Belt remains and is not further eroded.

- 2.17. The Council proposes to designate five reserved sites which would deliver around 130 dwellings. This is just 2% of the overall housing target which offers no flexibility within the Local Plan should affordability continue to worsen and the market showing no signs of stabilising.
- 2.18. The 2019 NPPF requires policies in Local Plans to be reviewed at least once every five years (Paragraph 33). There is also the possibility of an earlier review as set out in proposed MM to Policy 6A (b) to which we do not agree as previously alluded to. At the time of a Local Plan Review, it is likely that the LHN figure will have increased as evidenced by 2018-based SNHP and the revised standard methodology (see our Matter 2 Hearing Statement) and as such more sites are likely to be needing to be allocated for growth and development.
- 2.19. The Council has identified that the capacity for residential development from brownfield sites is no longer sufficient to provide the number of homes required over the plan period. Whilst we applaud the Council in trying to deliver as much development on brownfield sites as they are able, the reality is that many of these sites have stagnated for some time and have struggled to come forward, even during times of regional grant and gap funding. As such, the Council have to acknowledge that in order to deliver the infrastructure required to improve the economic profile of the district, that more Green Belt land must be released.

**Q3.3 Having regard to the housing and employment need figures and the spatial planning consideration above, is it justified to set 5,520 dwellings<sup>1</sup> (at least 276 dwellings per year) as the housing requirement for the Plan period and at least 29ha as the employment land requirement?**

- 2.20. No, for the reasons given above and in our previous Matter Statements, we consider the housing need figure is set too low. We consider that should the Government's revised housing methodology be adopted, the local housing need figure for Wyre Forest will represent a significant change and will be significantly more justifiable given the current economic climate.
- 2.21. Looking at the Council's past track record on housing delivery, it is as follows:
- 2015/16 – 226
  - 2016/17 – 262
  - 2017/18 – 184
  - 2018/19 - 183
- 2.22. Over the last four years the Council have delivered an average of around 200 dwellings per annum, against a requirement of 200 that was clearly very low (based on the now abolished RSS figure). The Council will clearly need to step-up delivery rates significantly to meet their new housing target (whether utilising the current standard methodology or revised methodology), clearly demonstrating that if anything, allocations within the plan must increase to deal with level of LHN.
- 2.23. The Council has determined its housing need as 276 dwellings per annum, which totals 5,520 dwellings over the plan period. As set out in the Matter 2 Hearing Statement, the Council could

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<sup>1</sup> And in addition, 487 Class C2 units of accommodation



have been more ambitious in its calculation of housing need based on the latest demographic data and to deliver more affordable housing.

- 2.24. The Council proposes that its housing need and housing requirement figures are the same. However, it is critically important to distinguish between housing need and the housing requirement.
- 2.25. The NPPG states that *'the standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure'* (ID 2a-002-20190220). So presumably the Council's alternative approach to calculating housing need will not result in a housing requirement figure. The NPPG clarifies that need and requirement are distinct processes by stating that *'housing need is an unconstrained assessment of the number of homes needed in an area. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations'* (ID 2a-001-20190220).
- 2.26. The Council have identified an overall housing land supply of circa 6,365 dwellings (circa 15% above the proposed housing need of 5,520 dwellings) so there is scope for both higher housing need and housing requirement figures within this emerging plan. We consider that this needs to be considered during the Examination of the Plan to determine whether the LHN figure for the plan is robust and sound and subsequently whether the plan can proceed to adoption.