

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

**Response on behalf of**

**Bloor Homes (Western)**

**MATTER 3**

**Introduction**

1. Harris Lamb Property Consultancy (HLPC) are instructed by Bloor Homes (Western) (BHW) to prepare a response to the Inspector's issues and questions in relation to Matter 3. BHW are promoting land at Hurcott Lane, on the eastern edge of Kidderminster, for residential development. The site is proposed for housing and employment development and is considered suitable for development to meet the needs of the District over the Plan Period. The site is not currently identified as a draft allocation but is considered suitable and deliverable should there be a need for the Council to identify any additional or alternative sites for development following the Examination. Our comments to Matter 3 should be read in this context. We set out our detailed responses to the Inspector's questions below.

***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:***

2. Yes. BHW agree that the Plan contains a sound spatial strategy that seeks to focus the majority of new development in the three main settlements in the District and that the majority of new development is to be focussed around Kidderminster. BHW agree that Kidderminster as the largest settlement in the District should be the focus for new growth as it already has a number of existing shops, services and facilities within the town along with employment opportunities. It is in our view correct to direct major new development to the most sustainable settlement and where there is the most need for housing and employment.
3. We understand that the Council has had discussions with its neighbouring authorities about whether any of them would be prepared to accommodate any of the District's development needs. Following these discussions, no agreement was reached about any of the neighbouring authorities accommodating any of the Council's need nor does the Plan seek to make provision to meet any unmet need arising from adjacent authorities.

***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?***

4. BHW agree that the broad apportionment of housing, economic and other development to the various centres throughout the District is consistent with the Plan's spatial vision and objectives. In light of BHW land interests on the edge of Kidderminster we particularly welcome the fact

that approximately 74% of the total residential allocations are being directed to the town, and in particular to the Kidderminster Eastern SUE. In allocating the Kidderminster Eastern SUE, the Council clearly consider that it is a sustainable location for new development. Additional land around the draft SUE has previously been considered in the course of the preparation of Plan, including the land at Hurcott Lane, which is now controlled by BHW. BHW are, therefore, of the view that the eastern side of Kidderminster is an appropriate location for new development and that the apportionment of development across the District will be sufficient to meet its development needs.

***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:***

5. Yes, BHW agree that the Plan is based on adequate evidence including the Site Selection Paper (SSP01), the Housing Topic Paper (ED3) and the Housing and Economic Land Availability Assessment 2019 (“HELAA”) (HOU04) and that these demonstrate that the minimum housing requirement is deliverable.
6. However, whilst BHW were generally supportive in its representations to the overall housing requirement set out in the Local Plan – Amendments To Pre-Submission Draft Consultation we did note that if sites did not come forward as expected then the Council should look to undertake an early review of the Plan and we maintain this position. Whilst we have no reason to suspect that the Council’s strategy is not deliverable at present, clearly time will tell if it is or not.

***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?***

7. Yes, we consider that they have been thoroughly assessed and which have resulted in the preferred allocations being identified. Clearly in identifying the Kidderminster Eastern SUE as a preferred allocation it demonstrates that potential impacts as identified above are considered acceptable by the Council and that the site is capable of accommodating development accordingly. BHW make the point that the land at Hurcott Lane, due to its proximity to the SUE would also perform in the same way as the SUE and would, therefore, accommodate development as well without having an adverse impact.

***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?***

8. In our view the Council have thoroughly assessed the availability of brownfield land through the HELAA and that suitable development opportunities on such sites are reflected in the draft allocations. Furthermore, we support the conclusions in the Site Selection Paper that there are not enough brownfield sites to meet the housing requirement (paragraph 3.20). In light of these conclusions and the lack of previously developed land in the urban area it is clear that there is need to release land from the Green Belt in the current Plan. Notwithstanding this, the lack of available brownfield or previously developed sites now means that in all likelihood there is not going to be sufficient land available when the Council comes to review this Plan and again they

will be faced with having to look at the Green Belt for suitable sites for development. As such, we agree its wholly appropriate to identify all possible sources of previously developed land now although in doing so, the Council need to be mindful of how they will meet their development needs when it comes to review the Plan. We return to this point in our response to Q3.2 a.

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

9. Yes. A good range of different types of housing sites are identified in the Plan, including the SUE on the edge of Kidderminster as well as the former Lea Castle Hospital site, both of which are allocated to deliver 1,400 dwellings. Once these are up and running they will deliver housing over the Plan Period. In addition, a range of smaller and medium sized sites are also proposed both in Kidderminster but also in the other two main settlements. This approach is consistent with both paragraph 72 of the Framework that 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 as well as paragraph 68 that 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.
10. The range of sites that are allocated provide choice to prospective purchasers whilst also allowing a wide range of different products to be constructed, thereby helping to meet a diverse range of needs.

***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?***

11. BHW agree that on the whole the strategy seeks to optimise the density of development with Policy 8A suggesting that a target density of 35 dph be sought unless local characteristics would prevent this being achieved.

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

12. The delivery of new housing in the District is heavily dependent on two large SUEs coming forward to deliver up to 2,800 dwellings. If the necessary infrastructure is not delivered in a timely manner then this could slow down the delivery of new housing, and possibly leading to a five year housing land supply shortfall. The respective wording for the two allocations makes reference to creation of new junctions on to the A449 and A448. One would hope that these were deliverable and would not frustrate a start being made on the site. Clearly, if there are concerns over infrastructure and when this will be delivered, particularly on the larger allocations, it reinforces BHW's view that a range of other sites should be identified that can come forward to deliver new housing in the short terms as the larger more infrastructure dependent come on stream.

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

13. Yes. The Green Belt topic paper (ED20) confirms at paragraph 6.2 that the Council held Duty to Co-operate meetings with its neighbouring authorities and were asked whether they would be able to accommodate any of the District's needs. The Council confirm that no neighbouring authority was willing to accommodate any of its needs, principally because they are also Green Belt authorities that are also looking at removing land from the Green Belt in order to meet their own development needs. Signed Statements of Common Ground confirm this to be the case (ED10B, ED10C, ED10D, ED10E, ED10F, ED10G).
14. Whilst the Council are not proposing to accommodate any of the unmet needs of its adjoining neighbours and vice versa, we note that in Policy 6A(b) reference is made to carrying out an early review of the Plan and in doing so considering the housing needs of neighbouring authorities. Whilst there is no need for the Council to accommodate any of the unmet needs arising from its neighbours, there is the potential that this may change in the future. BHW welcome the intention to carry out an early review of the Plan if there is a need for the Council to meet some of the unmet needs arising in other local authority areas nearby.

***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]***

15. Paragraph 136 of the Framework confirms that once established Green Belt boundaries should only be altered in exceptional circumstances which are fully evidenced and justified and through the preparation or updating of plans. The Council state in paragraphs 7.13 – 7.16 what they consider the exceptional circumstances to be that warrant releasing land from the Green Belt. Central to this is the lack of available previously developed land in the built up area. 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. In the absence of sufficient previously developed land within the urban area, the Council would not be able to meet its development needs over the Plan Period. As such, we agree that these demonstrate exceptional circumstances that warrant land being removed from the Green Belt.
16. In terms of whether the identified reserved sites will be sufficient to ensure that the amendments to the Green Belt that are proposed now will endure beyond the Plan Period, we do not believe they will. In our view, the Council should take a much longer term view in terms of releasing land from the Green Belt now and safeguarding it for development. The fact that Green Belt land is required now because of a lack of previously developed sites is a position that is not likely to change when the Council come to review the Plan. In all likelihood more land will need to be released from the Green Belt to meet future development needs. Paragraph 139 of the Framework advises that land can be removed from the Green Belt and safeguarded for future development well beyond the end of the Plan Period. BHW contend that additional land should be designated as reserved sites (or safeguarded) in order to avoid the situation where the Green Belt will have to be reviewed again in five years' time.
17. The need for more land for development may also be compounded if the Council do have to make land available to help meet the needs of the Black Country for example of its housing requirement significantly increases as a result of changes to the standard method. As such, BHW

suggest that more land is removed from the Green Belt now and safeguarded to guard against these potential eventualities.

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

18. Yes, the compensatory measures outlined in the Green Belt Topic Paper (ED20) are appropriate and include the creation of two new Country Parks, one in the Stour Valley to the north of Kidderminster and the other on part of the former Burlish Golf course, that lies to the north of Stourport on Severn. We consider that the creation of these two new facilities will provide improved recreational access to the Green Belt and will adequately compensate for the removal of land from the Green Belt.

***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<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?***

19. As detailed in our original representations we were generally supportive of the overall housing requirement of 5,520 dwellings (276 dpa). Similarly, we welcome the principle of over allocating against the housing requirement in order to provide some flexibility in case certain sites do not deliver. Due to the reliance on two large SUEs to deliver over half of the Council's housing needs we suggest that a slightly greater allowance of say between 20 – 25% was included rather than the 15% that is currently applied. Clearly if more sites are required then BHW would like its site at Hurcott Lane considered as a possible allocation.
20. We also note that due to the presence of Green Belt throughout a large part of the District, should the Council experience a five year housing land supply shortfall, this will pose problems when seeking to engage the tilted balance set out in paragraph 11d) of the Framework as a way of seeking to increase the supply of housing outside of existing settlements. Allocating land over and above the minimum housing needs figure will help prevent this occurring and is therefore supported.

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

21. No comment