



Wyre Forest Local Plan Examination

Matter 4: Lea Castle Village

18 January 2021

Homes England (representor no. 1193261)

Question 4.1 (i) Is the site's allocation for a new village and the proposed indicative quantity and mix of development justified by the evidence?

- 1.1.1 The site's allocation is justified by the Council's evidence including its site selection and Sustainability Appraisal Process. There is a need to accommodate development and meet housing and employment needs which cannot be achieved solely on land outside of the Green Belt and which cannot be accommodated in neighbouring authorities. The development is making best use of a brownfield site and surplus public sector land. The allocation is of sufficient size that ensures the sustainability of the core site is enhanced through provision of a local centre, primary school, employment, new playing pitches and extensive open space.
- 1.1.2 The policy should not be overly prescriptive about the number of dwellings on each parcel of land as this is subject to detailed masterplanning work that will ensure that the more sensitive parts of the site, such as the northern parcel are designed to the appropriate density. However the current policy wording needs to be updated to reflect the land area available for residential, particularly on the eastern parcel.

Question 4.1 (ii) Is the allocation appropriate, compared with the reasonable alternatives?

- 1.1.3 The Council's site selection work and Sustainability Appraisal finds that the site is appropriate when compared with the reasonable alternatives and Homes England supports this. The Core site within this allocation already benefits from planning permission for a mixed-use development and the site is surplus public sector land.
- 1.1.4 Providing further mixed-use development at this location is entirely logical and represents good planning. The scale would create a new sustainable village which, in addition to a considerable amount of new market and affordable housing, would benefit from a new primary school, local centre including retail community uses and employment. As such, the development would be self-sufficient for everyday needs, reduce pressure on existing local facilities and would provide good sustainable transport connectivity beyond the village. However, being close to Kidderminster the development would also support facilities within the town.
- 1.1.5 The site is within Homes England's ownership. Homes England is the Government's housing accelerator tasked with using public land and working collaboratively with partners to deliver houses where they are most needed.
- 1.1.6 Survey work has confirmed that there are no overriding constraints to delivery of the allocation. Homes England has been working closely with the District Council and key Stakeholders to establish



the appropriate mix of uses for the scheme and will continue to do so throughout the planning application process. Homes England is committed to bringing forward a high quality sustainable scheme as quickly as possible to deliver much needed new development in the District and to assist the District in meeting the Government's housing delivery targets.

Question 4.2 Are there exceptional circumstances that justify the proposed changes to the Green Belt boundary in this location?

- 1.1.7 The Council's justification for reviewing Green Belt boundaries is set in the context of needing to accommodate development and meet its housing needs. The Council has considered the reasonable options for meeting its housing need. It has confirmed that neighbouring authorities are unable to accommodate any of its needs and there are insufficient suitable brownfield or non-Green Belt sites to the east of the River Severn. Based on its evidence base and Sustainability Appraisal findings, the Council considers that there are exceptional circumstances that justify the change to the Green Belt at this location to enable a mixed-use development of sufficient scale to be sustainable.
- 1.1.8 The allocation is surrounded by the local road network, creating a long-term defensible boundary to the village which will contain the development and avoid coalescence with other settlements, whilst still allowing pedestrian and cycle connections to Cookley and Broadwaters.

Question 4.3 How will the development contribute to compensatory improvements to the Green Belt?

- 1.1.9 The site currently has no public access other than via a Public Right of Way. The wider site is agricultural and of low ecological value. Homes England has been working with the Worcestershire Green Infrastructure (GI) Partnership to consider opportunities to improve GI on and around the site by ensuring that the site's woodland is protected and opportunities for wider biodiversity and recreational links are created. Access to the woodland on site is to be opened up with footpaths and a trim trail through the area. A significant area of acid grassland habitat, a priority habitat in Worcestershire is proposed, and sustainable drainage features will be integrated into the scheme.
- 1.1.10 Around 40% of the allocation area will be GI, providing significant opportunities for physical activity close to people's homes. The provision of new playing pitches in addition to the existing will significantly improve provision for not only the local community, but also for the district. The Concept masterplan includes land for allotments or community orchards, encouraging healthy living.
- 1.1.11 These environmental improvements along with opening up the site for public access offer significant benefits and compensatory improvements in accordance with section 64-002-20190722 of the National Planning Practice Guidance.

Question 4.4 (i) What is the basis for expecting that around 1,400 dwellings will be delivered by 2036?

- 1.1.12 Homes England is committed to delivering 1,400 dwellings and community facilities on site by 2036. Homes England's remit is to increase the number of new homes built and accelerate housing delivery and therefore it is well placed to deliver the requirements of this site by 2036. The single ownership will reduce complications or delays that can be associated with multiple ownership land assembly.



- 1.1.13 Clear evidence of Homes England's commitment is the fact that construction has already started on the Core Site, and the developer, Vistry Homes has committed to accelerate the pace of delivery, working alongside Citizen to deliver new homes. First occupation is anticipated in Spring 2021. Early delivery of the Core site has significant benefits for the of delivery of the local centre, school and new playing pitches, ensuring the site's sustainability from an early stage of development.
- 1.1.14 The nature of the site, with separate accesses means that there is potential for more than one parcel to be delivered at once, increasing delivery rates. The unique character of each area and opportunity for more than one developer including SMEs will offer considerable choice of housing. Homes England can take on the master developer role, delivering strategic infrastructure and ensuring excellent placemaking. It is anticipated that around 80 to 160 dwellings could be completed per annum.
- 1.1.15 The Core site is anticipated to be complete in eight years and first completions on the wider site would be in 2024. If 80 dwellings were completed per annum on the wider site, then the development would be complete by 2034. However, it is anticipated that the pace of development will be increased through multiple outlets, thus reducing this timescale.

Question 4.4 (ii) Are there infrastructure requirements, funding arrangements, phasing or other factors that may affect the timescale for the development and that should be addressed in the Plan?

- 1.1.16 The Core site is under construction, very clearly demonstrating that the site is deliverable. Funding arrangements are in place for this phase to provide 40% affordable housing, over and above the policy and S106 requirement.
- 1.1.17 Homes England has access to a range of investment tools and is currently investing in infrastructure schemes to unlock the development of sites. Homes England is working with WFDC and WCC Highways and Education, and the CCG to establish the phasing of key physical and social infrastructure and is exploring opportunities to accelerate the delivery of key highways, education and utilities infrastructure where this can accelerate the pace of development. Homes England considers that funding arrangements and phasing are best dealt with through the planning application process as this enables detailed technical work to be undertaken and feed into these decisions rather than trying to fix these too early in the process, reducing flexibility.
- 1.1.18 Homes England is currently working with stakeholders to identify ways of delivering a temporary community hub on the Core site within the next 12 months. This will support the new residents of the Core site prior to the Local Centre being delivered on the western parcel of land.

Question 4.5 Is the proposed provision of affordable housing on the site justified and deliverable?

- 1.1.19 Policy 8b requires a minimum of 25% affordable housing. Homes England considers that this is justified in order to meet the affordable housing requirements of the District. Homes England is committed to provision of policy compliant levels of affordable housing on the site and has access to a range of funding tools that could support the delivery of affordable homes on the site
- 1.1.20 Homes England is also working with local community groups and partners to develop proposals for an element of self-build housing and is currently working with local community groups to identify appropriate locations for this provision on site.



Question 4.6 (i) How will any competing demands on funding for affordable housing, infrastructure and various facilities be resolved?

- 1.1.21 Homes England has a range of investment tools that it can access and is able to provide upfront investment in infrastructure where necessary to unlock sites and ensure good placemaking by putting key facilities in early. It is also committed to providing policy compliant levels of affordable housing on the site.
- 1.1.22 The Council's Infrastructure Delivery Plan (IDP) forms the basis of establishing the infrastructure requirements, and costs will be refined as detailed work and designs for infrastructure on a site wide basis are progressed.

Question 4.6 (ii) Overall, is the allocation viable?

- 1.1.23 Homes England is confident that the site is viable, and this is clearly demonstrated by construction starting on the Core site. Homes England will work closely with WFDC and WCC regarding the phasing of infrastructure and facilities to ensure the viability of the scheme.

Question 4.7 Should provision be made for Gypsy and Traveller accommodation on the site, subject to identified need?

- 1.1.24 Subject to confirmation of need for Gypsy and Traveller accommodation and evidence based assessment of suitable sites in the District, there is the potential for provision of a small number of pitches at Lea Castle Village, with the most appropriate location being considered as part of the detailed design. This will need to be balanced alongside the need for other land uses, appropriate residential densities and a critical mass that can support the primary school and local centre. Timing of delivery of Gypsy and Traveller pitches could be early in the plan period, subject to confirmation of the most appropriate location within the site and how this relates to provision of services.

Question 4.8 With reference to Table 10.0.1 of the Plan, is it proposed to develop 2 separate parcels of land within Lea Castle Village for employment purposes and if so, is this sound?

- 1.1.25 The Core site planning permission included an element of employment uses, but given the wider site allocation, Homes England now considers it more appropriate to consolidate all of the employment land on the eastern parcel. This would enable the new and existing playing pitches to be co-located, creating a single sports hub. Table 10.0.1 should be updated to reflect this.
- 1.1.26 The Council's evidence base sets out the need for employment land to meet District requirements and suggests that the allocation of this level of employment at Lea Castle is justified. Homes England supports the provision of employment land on the site in the context of the need for this land being regularly reviewed and the policy being flexible so that it can respond to changes in economic circumstances and allow for new and flexible working practices in accordance with the NPPF, paragraph 81d. This is considered to be particularly important in light of the uncertainty around the longer-term implications of COVID-19 and Brexit.



Question 4.9 Do the recently implemented changes to the Use Classes Order in respect of employment and retail uses indicate that any modifications should be made to the policy requirements for this allocation?

- 1.1.27 The recent changes would not affect the requirements for the allocation as set out in Policy 31 as the policy itself refers only to employment. However, Policy 31.1 Lea Castle Village vision refers to delivery of B1 employment land. This would now fall under the new E class of development as would the Local Centre uses. It is however anticipated that there could potentially be some demand for smaller users of B2 uses, and therefore the policy wording could introduce some flexibility by referencing the new E class with some potential for smaller scale B2 uses. It could also make reference to employment generating uses to support the new community. It is anticipated that the Council will condition the type of employment uses through the outline planning permission once specific demand is established.

Question 4.10 (i) What is the status of the Concept Plan in Appendix B of the Plan and how should its relationship with the vision in Policy 31.1 and development principles in Policy 31.2 be clarified?

- 1.1.28 The Concept Plan is the initial concept for the site and illustrates how the allocation could be achieved. The plan has been informed by detailed technical work undertaken for the outline application for the core site, as well as initial technical work undertaken for the wider parcels, and opportunities and constraints identified.
- 1.1.29 Further detailed assessments and masterplanning for the wider land parcels is currently being undertaken and will be used to refine the more detailed layout, housing mix and densities, and specific location of land uses. The illustrative layout and key parameters will be agreed at the planning application stage. However, it is considered that the mix of land uses and overall level of housing as set out in Policy 31 and shown on the Concept Plan is achievable. Homes England will clearly set out the findings of any technical, environmental or design work that results in any significant changes to the Concept Plan.
- 1.1.30 The Concept Plan was included in the Statement of Common Ground agreed between Homes England and Wyre Forest District Council. This should be referenced in the supporting text rather than the policy itself as a Concept Plan that indicates how the allocation could be achieved, but make clear that this is subject to more detailed design work as part of the planning application.

Question 4.10 (ii) Should these policies be re-ordered and amended for clarity and effectiveness?

- 1.1.31 The principles of development (Policy 31.2) to be included as part of any outline planning applications for the allocation will reflect the vision for the new village as set out in Policy 31.1. The wording and order of these policies is clear and, as such, it is not considered that they need to be re-ordered.

Question 4.11 (i) Does the policy framework provide clearly and comprehensively for sustainable transport choices and connectivity within and beyond the new village?

- 1.1.32 Yes, the policy provides a framework by requiring a range of facilities as part of the new village that will ensure a self-sufficient scheme for everyday needs, reducing the car dependency of new



residents and encouraging walking and cycling within the scheme. This in turn would reduce pressure on existing facilities within the local area as well as the local highway network.

- 1.1.33 Worcestershire County Council are satisfied that the sustainable transport choices being promoted by the developer for the core site are viable and will provide good sustainable transport connectivity beyond the village, particularly when this allocation is considered.
- 1.1.34 The policy requires provision of pedestrian and cycle links both within and off the site (where deliverable) to connect to facilities in Kidderminster. Improved pedestrian and cycle links to Broadwaters are already consented as part of the Core site permission, and Homes England is committed to identify further opportunities to enhance pedestrian and cycle routes, including improved crossing facilities.

Question 4.11 (ii) How will the development be integrated into the public transport network?

- 1.1.35 As part of the Core site proposals, one of the existing bus services that provides a service between Kidderminster and Cookley, is to be re-routed through the site, with new bus stops located within the development. This will ensure that new residents are within a short walking distance of bus stops and is likely to encourage public transport use. The wider site is also within a short walking distance of some existing bus stops, but with the larger scale of development there is further opportunity to increase the frequency of bus routes through the site and to consider the options for greater bus links to Kidderminster railway station, with the potential for re-routing the 125 bus service through the site. The feasibility of a shuttle bus to Blakedown railway station would also be investigated. School bus provision to Wolverley High School and its funding will be dealt with through the planning application.

Question 4.11 (iii) How will any adverse traffic impact be mitigated?

- 1.1.36 Highway improvements will be necessary to mitigate the impact of the development. Worcestershire County Council undertook a series of model runs using the Wyre Forest Transport Model to model the local plan allocations and establish the cumulative impacts of the development. This work also identified mitigation measures and strategic infrastructure improvements that will mitigate the impacts of the increases in traffic. The WFDC IDP identifies the strategic measures and potential funding sources for each of the projects.
- 1.1.37 Once the detail of the proposals are worked up as part of the planning application, the Transport Assessment will establish the specific mitigation measures required to be agreed with WCC Highways. A Framework Travel Plan will also be prepared for the application to set out various measures that can be put in place to encourage sustainable transport choices.

Question 4.12 (i) Overall, are the detailed policy requirements clear, consistent, justified and deliverable?

- 1.1.38 It is considered that the policy requirements are clear, consistent and justified. The more detailed layout, housing mix and land uses will be subject to pre-application discussions with the Council and further detailed technical and design work for the site. Therefore the indicative number of dwellings in Table 31.0.1 should be updated to reflect the changes to the Concept Plan, although the exact split of dwellings numbers between parcels is subject to more detailed masterplanning.



- 1.1.39 The policy should set out a commitment for the regular review of employment land to ensure that there is scope for change should circumstances change or market demand for employment land changes considerably. This is consistent with paragraph 81(d) of the NPPF that advises planning policies to allow for new and flexible working practices and to enable a rapid response to changes in economic circumstances.
- 1.1.40 Policy 31.2 should be updated to reflect the replacement of Building for Life 12 with Building for a Healthy Life.
- 1.1.41 Policy 31.1 Vision should be updated at point 4 to reference provision of land for an artificial grass pitch (3G) or new grass pitches so that the most appropriate option can be agreed at planning application stage.
- 1.1.42 The start of construction on the Core site is evidence of the site's deliverability. Homes England's remit is to accelerate the delivery of housing, and it is committed to deliver the Lea Castle Village as a high quality new development with good placemaking at its heart.

Question 4.12 (ii) Will they guide the creation of a village with high quality buildings and places that relates well to its surroundings and nearby settlements, promotes safe and healthy communities, and conserves and enhances the natural and historic environment?

- 1.1.43 The detailed principles set out in the policy provide clear guidance for the development and will form part of the more detailed technical, environmental and design work that will be undertaken as part of the planning application work.
- 1.1.44 Homes England is committed to delivering places that are well planned, respond to the context of their surroundings and serve the needs of their communities. We are committed to delivering a high quality design that meets the standards required for Building for a Healthy Life accreditation and seek to achieve a 10% biodiversity net gain on the site.