



**Wyre Forest District Council
Local Plan 2016-2036**

Examination

Matter 4: Lea Castle Village
(Policies 31, 31.1-31.2 and supporting text)

Wyre Forest District Council Response

Contents page

	Page No.
Response to question 4.1	1
Response to question 4.2	3
Response to question 4.3	4
Response to question 4.4	5
Response to question 4.5	7
Response to question 4.6	7
Response to question 4.7	8
Response to question 4.8	9
Response to question 4.9	10
Response to question 4.10	12
Response to question 4.11	12
Response to question 4.12	16

Wyre Forest District Council

Wyre Forest District Local Plan (2016-3036) Examination

Matter 4: Lea Castle Village *(Policies 31, 31.1-31.2 and supporting text)*

Q4.1(i) Is the site's allocation for a new village and the proposed indicative quantity and mix of development justified by the evidence?

- 4.1.1 Lea Castle is surplus public sector land and includes previously developed land. An outline planning application for redevelopment of this redundant former hospital site was submitted in March 2017 to provide up to 600 dwellings, up to 3,350sqm B1 uses, 150sqm A1/A3/D1 uses (local shop/café/community space), public open space, ecological mitigation, drainage works, infrastructure and ancillary works. This application was approved by committee in November 2017 subject to the signing of a Section 106 Agreement. Following the Preferred Options consultation in summer 2017 there was widespread support for the creation of a stand-alone village based around this former hospital site as it was concluded that the development of only 600 dwellings would mean residents relying on existing services and facilities in Cookley and Kidderminster. All of the land at Lea Castle is in the ownership of Homes England and thus there were no ownership constraints in bringing forward the land for development. It is now proposed to allocate this wider site as a stand-alone village of approximately 1400 dwellings which will be large enough to support its own village centre with a convenience store, primary school, community facilities and the potential for a GP surgery. Housing will be a mix of types, sizes and tenures to cater for all sections of the community. It is also envisaged that a large amount of employment land will be provided with direct access onto the A451 Stourbridge Road together with new and upgraded sports pitches. All of this will be built around the existing wooded landscape.
- 4.1.2 The Site Selection Paper (SSP01) sets out the background to how the site came to be allocated. Following the Issues and Options consultation in 2015, officers discussed the various options going forward. It was agreed that a higher volume of housing than currently proposed (600 dwellings) would be required to make the site sustainable. SSP01a Site Selection Paper Appendix 1: Analysis of Constraints affecting Potential Allocations summarises the findings of the key pieces of evidence including the Green Belt Review, Green Infrastructure, Heritage, Strategic Flood Risk Assessment, Wastewater Treatment, Transport and Sustainability Appraisal. Using a traffic light system, the sites scored 17 ambers, 10 greens and 1 red.

4.1.3 SSP01 sets out the reasoning behind the decision to go with a stand-alone village based around the former Lea Castle Hospital site. Availability and deliverability of sites will dictate where sites are proposed for allocation rather than where existing development is based. Western Kidderminster is highly constrained by the need to safeguard the strategic gap between Kidderminster and Bewdley and a shortage of large viable brownfield sites. Bewdley is also constrained both by its historic core and topographically. Thus, the shortfall in both Kidderminster West and Bewdley has been taken up by the allocations at both Lea Castle and Kidderminster Eastern Extension. 1400 dwellings is considered to be the optimum size for a new community at this location. A smaller number of dwellings would not generate enough pupils to require a new school and would thus impact on nearby facilities in Cookley where there is no potential for expansion. A greatly increased number of dwellings would mean a much higher net developable area which would detract from the woodland and landscaped parkland setting. Discussions between officers from the Council, County Council and Homes England led to agreement that 1400 dwellings was the optimum size for this new settlement.

Q4.1(ii) Is the allocation appropriate, compared with the reasonable alternatives?

4.1.4 The Council considers that this allocation is appropriate. The alternative of just developing the brownfield central core where the former hospital buildings stood, would mean that the residents would have to rely on existing facilities in Cookley or Kidderminster. Cookley School and GP surgery are already at full capacity with little scope for expansion. The site is also separated from Cookley village by a busy fast road which does nothing to encourage sustainable non-car-based access to the school, GP surgery, shops and sports and social club in the village.

4.1.5 The site selection paper illustrates at Table 2 how a proportionate distribution of 6365 dwellings (276 per annum plus 15%) based on existing housing stock (at 2017) would look. It concludes at section 12 that certain parts of the District are heavily constrained and that suitable, sustainable and deliverable sites are not available in Bewdley and Kidderminster West in sufficient quantity and thus the decision has been taken to allocate Lea Castle as a new stand-alone community based around the existing residential approval. This site, together with the proposed Kidderminster Eastern Extension, will absorb this shortfall whilst also providing much needed additional infrastructure.

4.1.6 The alternative scenario of pepper-potting development across several sites around the District would lead to increased use of already stretched facilities and services and add to congestion through the town centres.

The creation of a stand-alone new community will provide employment land in an area of the District which has very little employment offer other than the established Titan Steel Wheels production facility in Cookley village. The Lea Castle Village Employment Land Market Assessment by Lichfields (May 2019) (ECON05) concludes that without this allocation the District will not be able to meet its objectively assessed need for employment land.

- 4.1.7 In terms of sustainability appraisal, the eastern parcel along the A451 Stourbridge Road does not score well as it is not adjacent to a built area, has poor access to local facilities etc. However, when considered together with the other sites at Lea Castle it helps to provide the critical mass needed to provide a new school and other facilities. The site, as a whole, scores well in the Sustainability Appraisal other than for the SA objective to protect soil and land and that to maintain the integrity of the Green Belt. As the entire development will be designed around a woodland landscape, overall site density is very low. In terms of Green Belt land take, it is proposed to remove all of the land parcels bounded by the surrounding roads in order to make a defensible Green Belt boundary and thus this includes some land outside of Homes England ownership.
- 4.1.8 Overall, the proposed allocation at Lea Castle Village is considered to be appropriate when compared with reasonable alternatives.

Q4.2 Are there exceptional circumstances that justify the proposed changes to the Green Belt boundary in this location?

- 4.2.1 The current Local Plan has a brownfield first strategy. However, analysis has shown that there is insufficient brownfield land available to meet the housing need going forward. All land outside of the urban areas and larger settlements to the east of the River Severn is covered by the West Midlands Green Belt. Putting large amounts of development to the west of the River Severn and thus outside of the Green Belt would not be a sustainable option as there are limited crossing points on the river and residents would have to travel through the town centres in order to reach the main areas of employment in Kidderminster and further afield in the West Midlands.
- 4.2.2 The Green Belt Topic Paper (ED20) sets out what are considered to be the exceptional circumstances which justify the proposed changes to the Green Belt. If Green Belt is not released, the Council would not be in a position to meet its own development needs. Most of the neighbouring local authorities are also Green Belt authorities or are struggling to accommodate their own needs. The release of Green Belt land is the most sustainable option as it focuses development in the most sustainable locations with good transport access to services and employment.

- 4.2.3 The Sustainability Report (SD04b) identifies a neutral effect in respect of the use of Green Belt as the Plan balances the protection of the Green Belt and the release of enough land for development. The land proposed for release from the Green Belt at Lea Castle accounts for almost 50% of the total proposed. The sustainability appraisal concludes that this approach will help to prevent speculative development in less sustainable locations.
- 4.2.4 The table on pages 30-31 of the ED20 sets out the exceptional circumstances, mitigation and residual effects on the surrounding Green Belt of developing the 4 parcels of land at Lea Castle. The central brownfield area (WFR/WC/15) where the hospital buildings have recently been demolished will not compromise the openness and permanence of the wider Green Belt as the site is well contained within mature landscaped planting. The western parcel adjacent to the A449 (WFR/WC/33) is judged to meet Green Belt purposes moderately and the openness and permanence of the wider Green Belt are unlikely to be compromised. The benefits of releasing these two parcels from the Green Belt and developing them are judged to outweigh the disbenefits. Although the eastern parcel (WFR/WC/32) and the northern parcel (WFR/WC/34) would have a greater impact on the openness and permanence of the wider Green Belt if released for development, these sites together with the other parcels can make an important contribution to meeting the District's development needs and the Council considers that the benefits of release outweigh any disbenefits when the sites are considered as a whole.

Q4.3 How will the development contribute to compensatory improvements to the Green Belt?

- 4.3.1 NPPG at 64-002-20190722 sets out potential compensatory improvements with new or enhanced green infrastructure, woodland planting, new or enhanced walking and cycling routes and improved playing field provision.
- 4.3.2 The proposals for the wider Lea Castle Village include new sports pitches, upgrading of existing pitches, additional native planting of hedgerows and woodland, creation of acid grassland and provision of new footpath and cycle links throughout the site and into both Kidderminster and Cookley. Circular woodland trails within the site will encourage both residents and others to use the site and thus relieve pressure on the nearby SSSI at Hurcott. The Reserved Matters approval for the central part of the site already includes a comprehensive network of such routes and the concept plan illustrates how a network of new footpaths will be created throughout the wider site creating recreational routes within the proposed

Village. The Concept Plan shows that additional open space provision within the additional non-previously developed parcels excluding amenity greenspace, drainage and sports provision would total approximately 15.8ha. Thus, it can be demonstrated that release of these land parcels from the Green Belt would contribute large areas of compensatory improvements to the Green Belt. At present there is one public footpath which crosses the northern part of the central site (WFR/WC/15). This extensive network of paths within the site will then connect into the wider footpath network in the area, including the long-distance Worcestershire Way.

Q4.4 (i) What is the basis for expecting that around 1,400 dwellings will be delivered by 2036?

4.4.1 The Council believes that the planned delivery of 1400 dwellings will be completed before the end of the Plan period in 2036. Work has already started on construction of the first 600 dwellings on the central part of the site. The wider site lends itself to multiple developers as different parcels are accessed from multiple points. An indicative phasing plan (Wood April 2020) shows a potential for 6 phases across the wider site starting with the local centre followed by low density residential development on the northern parcel before further residential development on the western parcel and provision of a primary school. More detailed master planning is programmed for 2021 which will determine the timeframes and different delivery parcels. As there may be up to 5 access points serving the different housing parcels, there is the potential to bring different parcels forward in tandem and involve a number of different developers. It is estimated that with at least two developers on site at any one time, the wider parcels could be developed with around 80-160 dwellings a year, taking up to 8 years to build. With three distinct parcels and multiple access points, there is the potential to create different character areas with a different offering to attract a range of buyers and tenants with much lower densities proposed in the northern parcel with the potential for self-build plots.

Q4.4(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?

4.4.2 The development of over 1400 dwellings was fully assessed by delivery partners for infrastructure requirements and will require appropriate infrastructure both on and off-site, including a new primary school and new highways infrastructure. As the central part of the site has high abnormal costs relating to site clearance and removal of underground tunnels, the Council has accepted that site viability will be constrained. Viability work undertaken by HDH in 2018 (IFT06) identified that the site

would only be deliverable with less than 5% affordable housing contribution and £2,000 S106 contribution per dwelling. However, once site specific costs were calculated, an affordable housing contribution of 15% was agreed along with other contributions of around £8500 per dwelling. This suggests that detailed site viability is likely to show an improved viability position over the plan (high) level viability.

- 4.4.3 The Pre-Submission Viability Note (IFT05) notes that a greater level of developer contributions is now being sought. Table 4.7 compares residual values to the benchmark land value with 30% affordable housing provision and full s106 contributions as set out in the Infrastructure Delivery Plan. The June 2019 results for the Lea Castle sites show that the remaining sites which make up the complete Lea Castle allocation are still deliverable. However, it is expected that some costs could be lower as these are top estimates for each infrastructure requirement based on a maximum cost and completed as a desktop exercise without understanding site specifics. This was undertaken without knowledge of the master planning and exact location of each infrastructure piece and is the best that could be achieved in the summer of 2019. The costs therefore could be reduced but will be dependent on how build costs change in the next five years and the exact positioning of the infrastructure.
- 4.4.4 In terms of on-site infrastructure, the biggest requirements are the two-form entry primary school and the village centre. The primary school will need to be operational when there are no longer sufficient places in existing primary schools to take the additional children generated by the first phases of the development. This will be determined by Worcestershire County Council utilising the developer's proposed phasing alongside the pupil forecasts based on known children living in the area. Funding arrangements for the school will be undertaken to ensure the school is forward funded as necessary. This should not delay delivery of the site.
- 4.4.5 Transport infrastructure will be delivered in more various ways with some on site projects being delivered by the developers and off-site matters being constructed by delivery partners of Worcestershire County Council. Funding for off-site matters will come from section 106 contributions and appropriate local growth funding bids. The key transport infrastructure matters are the new roundabout at Wolverley Road for the main access to the site and the additional car parking at Blakedown Station. The car park is already fully funded and will be delivered early in the build process for the wider site. Homes England have also secured the right to make additional connections for the laying of utility services to the wider site.

4.4.6 The site contains extensive woodland areas. All the proposed road and foot/cycle links will be through these areas. Those areas of woodland affected by the link road proposal are expected to be replaced with broadleaved planting over several phases and these can coincide with construction.

Q4.5 Is the proposed provision of affordable housing on the site justified and deliverable?

4.5.1 Policy 31.1 criteria 1 refers to affordable housing provision being expected to be in line with Policy 8b ie. 25%. However, it was thought likely that provision on the previously developed part of the site would be lower owing to the significant site clearance and infrastructure costs. The outline approval was for 600 dwellings with only 15% (90) being affordable. However, additional grant funding has been secured by the developer and there will now be an additional 150 affordable units provided bring the total affordable provision up to 40%. Delivery of the first dwellings is underway. Affordable housing provision on the wider site is still expected to be policy compliant at 25%. The site aims to meet the housing needs of the District as a whole and although it sits within Wolverley and Cookley Parish, it is not purely meeting their housing needs. The development is seen as a stand-alone sustainable village and is not part of Cookley.

Q4.6 (i) How will any competing demands on funding for affordable housing, infrastructure and various facilities be resolved?

4.6.1 The Wyre Forest District Council Cabinet members considered a report on viability priorities in September 2020 (ED13). This report sets out how the Council will prioritise the funding allocations through planning obligations for education, highways and affordable housing where a viability assessment has shown that all the obligations cannot be met. The priority agreed by Members was as follows:

- On and off-site infrastructure necessary to make the development acceptable
- Affordable housing
- Open space and recreation
- Education
- Other requests eg. Health provision, police

4.6.2 The Infrastructure Delivery Plan (IFT01) sets out the infrastructure required to support the proposals in the Local Plan to 2036 together with delivery mechanisms, the responsible body and potential funding sources.

Q4.6(ii) Overall, is the allocation viable?

- 4.6.3 HDH Planning & Development Ltd undertook viability appraisals for the various proposed allocations in 2017 and then reran this again in 2018 once more detailed costs were known. This study used a range of site typologies together with specific ones for strategic sites such as Lea Castle. This modelling showed that Lea Castle would be viable if some of the policy requirements were more flexible.
- 4.6.4 The 7ha of employment proposed at Lea Castle is excluded from the modelling. Calculations in May 2019 put S106 costs at just under £20,000,000. It should be noted that this includes the central part of the sites which already has planning approval for 600 dwellings. The Pre-Submission Viability Note uses different scenarios to compare the residual land value based on different percentages/tenure mixes of affordable housing but still providing all the other S106 contributions as set out in the IDP. Table 4.9 shows that at 5% affordable housing, all of the additional land parcels would be viable and that at 15% affordable housing the Eastern parcel would still be viable, but the western and northern parcels would be marginal. These models are based upon social rent rather than affordable rent as this reflects the nature of need within Wyre Forest. Further tables then demonstrate how a different tenure mix affects viability. At 25% affordable housing, with the affordable housing for rent delivered as Affordable Rent rather than Social Rent, the potential developer contributions could be increased by £2500/unit. Table 4.14 shows that at 25% affordable housing (35% Intermediate/65% social rent) and S106 as per IDP, viability is still marginal as none of the sites generate a Residual Value above the Benchmark Land Value.
- 4.6.5 In conclusion, the wider Lea Castle allocations demonstrate mostly marginal viability if all the policy requirements are satisfied. Funding from other sources will need to be sought, particularly Local Growth Funding for transport infrastructure and potential Education Funding Agency support for the delivery of the school. If other funding sources for both affordable housing and key infrastructure costs are available, then this site will be viable. It should be noted that the central core part of the site has consistently been shown to be unviable, but housing construction began on site in October 2020 and thus the site is deliverable.

Q4.7 Should provision be made for Gypsy and Traveller accommodation on the site, subject to identified need?

- 4.7.1 There is scope for provision on the site if the allocation of the land for Lea Castle goes ahead. Depending on the requirement of the households, it could help meet the need for employment land use on the site; the phased development of the site could match the phased requirement in the GTAA (ED15) needs survey and ownership of the site (Homes

England) might mean that this site is more likely to see Gypsy and Traveller provision than other sites.

Q4.8 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?

- 4.8.1 Table 10.0.1 does currently indicate 2 separate parcels of land within the Lea Castle site for employment purposes. Outline planning permission was granted in 2017 for a mixed-use development on the previously developed part of the site at Lea Castle for 600 dwellings and a small area of B1 light industrial use. The previously developed part of the site was transferred to the developer Vistry; this includes all land north of the existing sports pitches. The land allocated for employment use and the sports pitch and changing rooms has not been transferred to Vistry and remains in the ownership of Homes England.
- 4.8.2 The Council and Homes England have worked together and signed a Statement of Common Ground (SD10m) which includes a concept plan for the Lea Castle Village. Following this, the Council and Homes England have discussed exchanging the small employment allocation with the proposed new sports pitch adjacent to the large employment allocation fronting the A451. This would mean that all the employment land is sited as a single block, and all the sports pitches will be accessed off Lea Castle Drive. The total amount of land proposed for employment remains the same. The allocation is just amended to form one parcel instead of two. If the allocation remained as two separate sites, it may cause difficulties in bringing the smaller site forward for development due to its size and therefore it is preferable for them to be consolidated into a single entity. The Inspector's attention is drawn to MA/31.1 (SD12) which proposes an amendment to criteria 2 of Policy 31.1. The figure should be amended to read 7.34 hectares of employment land.
- 4.8.3 The proposed allocated employment sites at Lea Castle are considered sound. The Council's consultants Lichfields assessed the employment land requirement for Wyre Forest District (ECON04). The requirement was for at least 29 hectares. The Council is flexible with the type of employment uses that could be provided on the site as long as they support the District's existing strengths in industrial and knowledge-based industries. A mix of employment types would be most appropriate at this location.
- 4.8.4 It has been demonstrated in the Employment Land Review October 2018 (ECON04) that there is a need for additional employment land in Wyre Forest District and the proposed allocation of employment land is justified and positively prepared.

- 4.8.5 North Worcestershire Economic and Development Regeneration and Wyre Forest District Council [WFDC] appointed Nathaniel Lichfield & Partners [Lichfields] with Lambert Smith Hampton [LSH] to prepare an Employment Land Market Assessment of Lea Castle Village (ECON05). It examined the amount of employment land that could be justified on the site. It considered market demand as well as the existing amount of offices and industrial sites in Wyre Forest District.
- 4.8.6 Much of the existing employment land is situated south of Kidderminster between Kidderminster and Stourport on Severn. The employment land allocation at Lea Castle Village is the only one situated to the north of Kidderminster. At present, the Lea Castle area is not an established employment location and therefore the amount of employment land needs to be of a sufficient size to appeal to the market to ensure that it is effective. The site is located between the A449 Wolverhampton Road and the A451 Stourbridge Road to the north-east of Kidderminster. These are both key road links to the Black Country, which means that the allocation may attract employees from the northern part of Kidderminster as well as out of the District from adjoining authorities.

Q4.9 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?

- 4.9.1 In September 2020 the Town and Country Planning (Use Classes) (Amendment) (England) Regulations amended the Town and Country Planning (Use Classes) Order 1987 (UCO). Significant changes to the system of use classes were introduced. They include the reclassification of several uses. Class B1, which includes offices and light industrial, has been removed and is now incorporated within a new Use Class E which also includes the previous use classes A1 (Shops), A2 (Financial and professional services), A3 (Restaurants and cafes), D1 (Non-residential institutions) and D2 (Assembly and leisure). Change of use to another use within Class E will be allowed without the need for planning permission.
- 4.9.2 Lichfields were commissioned by Wyre Forest District Council to produce an Employment Land Review (ELR) in 2016 and this was updated in 2018 (ECON04).
- 4.9.3 At Lea Castle Village, 7.34ha of employment land is proposed to be allocated. The Council's vision for Lea Castle Village is to create a new sustainable village including residential development, a shop and land for employment uses. Lea Castle Village, by having land allocated for employment and community facilities including a shop, should minimise the impact of the development on nearby social infrastructure. Lichfields

with Lambert Smith Hampton were commissioned by Wyre Forest District Council to produce a Lea Castle Village Employment Land Market Assessment May 2019 (ECON05).

- 4.9.4 The Council is flexible with the type of employment that could be provided as long as it supports the District's existing strengths in industrial and knowledge-based industries. A mix of B-Class employment types would be most appropriate including uses that were previously in the B1 use class such as offices, digital & creative industries as well as advanced manufacturing. The majority of the demand may come from indigenous companies seeking to expand/relocate from outdated premises elsewhere in the District. (ECON05)
- 4.9.5 The Council would wish to use conditions and planning obligations in order to ensure that the use is consistent with the vision of Lea Castle being a sustainable village and meeting the economic development needs of the District. This would also comply with NPPF paragraph 8 where it states that "an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity"². This could be achieved by removing references to the old A1 and B1 use class and refer to shops, offices, research and development and light industrial. This would not affect B2 and B8 uses which are unchanged in the Use Classes Order 2020. This could make clear the Council's intention to use conditions and/or planning obligations to restrict new floor-space to a particular use only within Class E, in order to achieve the policy objectives and to prevent change of use to other uses within Use Class E without applying for planning permission.
- 4.9.6 It is proposed that the following condition could be attached to any planning permission on the allocated employment sites and the site for a shop:-

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking or re-enacting that Order with or without modification), the premises/building(s)/site(s) shall be used for shop/offices/research and development, light industrial and for no other purpose including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 2020, (or in any provision equivalent to that Class in any statutory instrument amending, revoking and/or re-enacting that Order with or without modification).

Reason: In order to define the permission in accordance with Policy 31.1 of the Wyre Forest District Local Plan and the National Planning Policy Framework.

Q4.10 (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?

4.10.1 The Concept Plan shown at Appendix B is the version which was consulted upon at Regulation 19 in 2018 and again in 2019. An updated one is attached to the Statement of Common Ground with Homes England. Consultants will be working on a more detailed masterplan in tandem with the Hearing sessions, but this is not expected to be finalised in time for inclusion with the Local Plan. The latest version available is that attached to the SOCG. This Concept Plan sets out visually how the Vision set out in Policy 31.1 and Principles of Development outlines at Policy 31.2 could look in practice. Additional text will be required either before or after the policies to signpost readers to the Plan in Appendix B. It should be noted that this plan is purely illustrative in policy terms.

Q4.10 (ii) Should these policies be re-ordered and amended for clarity and effectiveness?

4.10.2 The Council considers that the two policies follow a logical order with a general vision policy setting out what should be provided on the site and the second policy giving the details to be considered as part of any planning application. These two policies have evolved through detailed discussions between the Council, Homes England and other statutory consultees. If, however, the Planning Inspector can explain her rationale for reordering the policies, the Council would be happy to do so.

Q4.11 (i) Does the policy framework provide clearly and comprehensively for sustainable transport choices and connectivity within and beyond the new village? (ii) How will the development be integrated into the public transport network?

4.11.1 The first two questions will be taken together. Worcestershire County Council set out the opportunities apparent to maximise sustainable travel options in the following paragraphs.

4.11.2 It is important to understand the sustainable transport choices provided for by that part of the allocation which already has planning consent and the potential to extend the approved pattern of development across the entire allocation. The Plan allocates the whole site comprising 1400 dwellings. Lea Castle Village will also provide land for employment uses, and new and upgraded sports pitches.

4.11.3 This residential figure includes 600 dwellings at Lea Castle ex-hospital site which also has outline planning approval (17/0205OUTL); Decision Notice dated 27th June 2019. On the 20th May 2020, a Reserved Matters planning application was approved (19/00724/RESE) which considered

the details of the street design requirements, the internal layout, footways, internal connections, bus stop locations and street lighting. These matters were considered in detail and approved, subject to formal technical approval as part of the Section 38 Highways Adoption process. The transport assessment work which supported the consented part of the allocation had sustainable travel choice at its heart with the internal connectivity being well defined and the remainder of the site will likely continue in the same vein as required by Policy 13.

- 4.11.4 Attached to consent 17/0205/OUTL, the supporting bus strategy considered the existing commercially operated services, current and future patronage, routeing, phasing and timetabling. The majority of buses in Kidderminster are currently provided by Diamond Buses. Bus routes 9A and 9C connect the town centre with Cookley. The Developer is promoting the diversion of bus route 9 away from Wolverhampton Road, into the site of Lea Castle Hospital. The County Council are satisfied that the alterations to bus services being promoted by the developer and which are secured by condition are viable and will provide a good sustainable transport connectivity beyond the village, particularly when the remainder of the allocation is taken into account whilst remaining to serve existing residential catchment areas and would add 1.4km to the journey or approximately 5 minutes journey time.
- 4.11.5 Timing for the delivery of this bus service for the consented development, will be considered in conjunction with the phasing of construction and occupation for the 600 dwellings. The bus timetable promotes a circular route with provision for an interim/temporary route provided by the new roads of the development during the construction phase to achieve sustainable travel choices as early as possible. The average walking distance within the development to the new bus stops will be approximately 450 metres. In accordance with the Bus Strategy, it is agreed that all works related to the bus route (bus stops, timetable information etc) would be completed prior to the final occupation of the consented development.
- 4.11.6 Enhancements to the walking and cycling network have been promoted by the developer for the first 600 dwellings with a comprehensive network of internal connections as well off-site improvements. Specifically, the developer will provide footways along the site frontage where accesses are proposed, together with a new 3m unsegregated shared use footway/cycleway provided adjacent to the southbound section of the A449 between a new pedestrian crossing and another new uncontrolled crossing in the direction of Broadwaters and Kidderminster. Both of these crossings will be provided by this development.
- 4.11.7 Policy 13I sets out the requirement for the Transport Assessment Strategy following a similar evidence led approach to engagement with commercial

operators to developing a frequent bus service continuing the momentum of the obligated service for the 600 dwellings.

- 4.11.8 The Plan also makes provision for upgrading bus infrastructure, ensuring high quality bus stops to actively promote the usage of bus services, secured through planning conditions/ obligations. The County Council would expect stops to be provided with solar powered shelters & Real Time Information at Stop Displays (with RNIB React). This is set out in Wyre Forest District Council Infrastructure Delivery Plan, June 2019, Appendix 1: Schedule of Infrastructure (ITP01).
- 4.11.9 It is recognised that more demand-responsive forms of public and community-based transport, such as community buses, dial-a-ride cars and taxis, will also be required if the needs of these residents are to be fully met. Developments in new technology are likely to enhance the ability of community transport providers to offer flexible, accessible and responsive solutions to assist in meeting unmet local transport needs.
- 4.11.10 A contribution towards a site-wide personalised travel plan has been secured through the S106 agreement for the 600 dwellings. The County Council uses the Modeshift STARSfor (Sustainable Travel Accreditation and Recognition Scheme) system, which is the national travel plan rating scheme that has been established to recognise excellence in supporting walking, cycling and other forms of sustainable transport. As sites emerge, it is anticipated that travel planning will form a significant component of the sustainable transport strategy as already embraced for the 600 dwellings.
- 4.11.11 In addition, the Plan makes provision for further enhancement of the off-site walking and cycling infrastructure compatible with improvements to the A449 delivered by the developer for the first 600 dwellings. This includes a cycleway on the A451 Stourbridge Road from Park Gate Inn to A449 (Wolverhampton Road) mini roundabout, connecting the Lea Castle site to Kidderminster. Further developer contributions for this will be sought as sites emerge. This is outlined in Wyre Forest District Council Infrastructure Delivery Plan, June 2019, Appendix 1: Schedule of Infrastructure (IFT01).

Q4.11 (iii) How will any adverse traffic impact be mitigated?

- 4.11.12 The traffic impacts associated with the first 600 dwellings were comprehensively assessed through a Transport Assessment. Assessed in 2013 and utilising the Wyre Forest Transport Model (WFTM), a 2031 with and without development scenario was tested. Following the strategic traffic model's identification of network constraints using the WFTM, individual junction assessments were undertaken to consider impacts in detail and the package off-site highway interventions as proposed by the

developer, appraised by the Highway Authority and secured via Planning Conditions. Schemes addressed both capacity and safety issues at the following locations:

- **A449 Wolverhampton Road / Park Gate Road (a significant improvement to the signalised junction)**
- **Wolverhampton Road / The Crescent (the provision of right-turn facility to promote free-flowing traffic and safety)**
- **Stourbridge Road / Park Gate Road (the provision of right-turn facility to promote free-flowing traffic and safety)**
- **A449 Wolverhampton Road / A451 Stourbridge Road (improvements to the arrangement of the junction)**
- **Multi-modal access points for the site**

4.11.13 The Transport Evidence in support of the Plan utilises the 2036 WFTM tested the entirety of the allocation. This is set out in the Wyre Forest Local Plan Review, Transport Evidence, June 2019. (IFT02)

4.11.14 The modelling identified issues at the above locations, where a mitigation strategy for the 600 dwellings has already been identified. Delivery Plan, June 2019, Appendix 1: Schedule of Infrastructure sets out the mitigation for the full allocation in full. The Plan makes provision for further contributions where additional mitigation is required as part of maximising sustainable travel opportunities.

4.11.15 The IDP makes provision for measures long the A449 enhancing the proposals already secured as part of the first 600 dwellings ((IFT01): Schedule of Infrastructure). This builds upon the previously detailed consideration of these junctions through individual junction assessment and option development. As set out in the IDP, contributions will be sought to deliver for enhancements where necessary as sites emerge in greater detail, building upon the extensive detailed work and transport appraisal already undertaken in development of the mitigation for the first 600 dwellings.

4.11.16 The Plan therefore aligns with the County's Council's aims as set out in the Local Transport Plan 4 which are to target investment in three broad areas:

- Transport Technology.
- Travel Choice; and,
- Capacity Enhancement.

Q4.12 (i) Overall, are the detailed policy requirements clear, consistent, justified and deliverable?

- 4.12.1 The detailed policy requirements for Lea Castle Village are clear, consistent and justified. The specific requirements are drawn from the evidence base of the plan preparation including the site selection methodology (SSP01), green infrastructure concept statement (GI01-GI02), the Heritage Impact Assessment (HSR01), Strategic Flood Risk Assessment (FR01), and the Infrastructure Delivery Plan (IFT01). The deliverability of the site is discussed in the Housing and Economic Land Availability Assessment report (HOU04d) within the evidence base of the Local Plan.
- 4.12.2 Policy 31.1 will deliver 1400 dwellings in a new village development. Given the comprehensive scale of the development this will be able to support additional features such as a community facility, primary school, and the provision of land for one artificial 3G pitch or one grass pitch, and 7ha of employment land. Lea Castle Village is considered in the Wyre Forest Viability Assessment (IFT06) which needs to be considered along with the wider evidence base. A separate review of the financial viability in respect to Lea Castle Village has also been prepared under examination document reference ED9C.

Q4.12(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?

- 4.12.3 All development will be expected to be of high-quality design, to be consistent with Policy 27A. A Design and Access statement will need to demonstrate design that integrates effectively with its surroundings, to reinforce local distinctiveness and conserve, where appropriate, enhance cultural and heritage assets, landmarks, and their settings.
- 4.12.4 The site has visual boundaries which will emphasise that this is a stand-alone development and not an extension of Cookley village. Axborough Wood, which is ancient woodland, will be appropriately buffered from any new development. Circular routes will be designed around the site to encourage cycle and pedestrian nature trails and limit additional pressure to the nearby SSSI of Hurcott. Further development principles required for Lea Castle Village are discussed within the Kidderminster North GI Concept Statement. (GI02)