

Matter 5: Kidderminster Eastern Extension

Response on behalf of

Bloor Homes (Western)

MATTER 5

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 5. 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 5 should be read in this context. We set out our detailed responses to the Inspector's questions below.

Matter 5: Kidderminster Eastern Extension (Policies 32, 32.1-32.4 and supporting text)

5.1 (i) Are the proposed allocations for the 4 sites that comprise the Eastern Extension, including the indicative quantity and mix of development, justified by the evidence? (ii) Is there a clear rationale for their allocation as a whole and is it appropriate, compared with the reasonable alternatives?

2. BHW agree that there is clear evidence that underpins the need for the proposed eastern extension to Kidderminster and that it represents the most sustainable option to accommodate a significant proportion of the housing growth for not only the town but for the wider District. BHW have no specific comments to make on either of the 4 parcels of land that make up the SUE and generally support the indicative quantity and mix of development that is proposed for it.
3. The Site Selection Paper (SSP01) sets out the background and evolution of the draft allocation noting that at the Preferred Options stage two options were proposed; Option A focussed sites on and around the edge of Kidderminster Town, whilst Option B proposed a more dispersed set of sites, with a number of Core Sites that were common to both options. Whilst ultimately the Council did not pursue either Option A or Option b and chose a blend of the two, the Kidderminster Eastern SUE remained in the Plan as a preferred strategic housing allocation. In light of the work undertaken by the Council in deciding upon the preferred housing allocations as detailed in the Site Selection Paper, BHW consider that there is a clear rationale for the allocation as a whole and that it has been fully considered when compared against reasonable alternatives.

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

4. Yes. Our response to Matter 3 confirmed our agreement to the Exceptional Circumstances that the Council have identified that in their view warrant amendments to the Green Belt boundary in this location. The lack of available previously developed land in the urban area in sufficient quantities is the overriding reason as to why the Council need to release land from the Green Belt in order to meet their housing needs going forward.
5. In our response to Matter 3 BHW also noted that due to the lack of available previously developed land currently, and hence the need to release land from the Green Belt this time round, the same is likely to occur when the Council come to review the Local Plan. As such, BHW advocate that a far greater amount of land than is currently proposed should be removed from the Green Belt now and safeguarded for future development to meet the needs beyond the current Plan Period and to avoid having to review Green Belt boundaries again when the Plan is reviewed. BHW are of the view that further land adjacent to the current SUE is suitable for development and should be removed from the Green Belt and safeguarded as part of the preparation of this Local Plan.
6. The need to safeguard land in our view is compounded by the likely changes to the standard method that will see the housing requirement for the Council rise above the current levels that are proposed. Furthermore, the Council also acknowledge that it may have to help meet some of the unmet development needs of adjoining authorities in the future. As such, there are more than likely going to be exceptional circumstances in play that will warrant the release of further land from the Green Belt as part of the next Local Plan review. In light of this, BHW consider that the land to the east of Kidderminster is an appropriate location to safeguard land and to direct future growth to.

5.3 Will the overall development provide for adequate compensatory improvements to the Green Belt?

7. The SUE will include new areas of publicly accessible open space for use by new and existing residents of the town. Whilst these will help increase access to areas that were previously in the Green Belt, the Council's principal compensatory measures include the creation of two new Country Parks, one to the north of Kidderminster in the Stour Valley and the other at the former Burlish Golf Course. Together these are considered to provide adequate compensatory improvements to the Green Belt.

5.4 (i) What is the basis for expecting that around 1,440 dwellings will be delivered in the Eastern Extension by 2036? (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?

8. The Kidderminster Eastern SUE is allocated for 1,440 dwellings, which equates to 29% of the total housing requirement for the whole District. The Council have included it in the Plan first at the Preferred Options stage and then subsequently in the Pre-Submission Draft versions of the Plan. The Site Selection Paper (SSP01) sets out how the Council have considered the site over the course of preparing the Local Plan and it remains in the Plan as now submitted for

Examination. On this basis, the Council clearly consider that the site is deliverable and that it will contribute to meeting the housing needs of the District over the Plan Period.

9. Furthermore, the majority of the site is being promoted for development by a major PLC housebuilder, which should provide greater certainty that the site will come forward for development promptly once the allocation is confirmed and that planning permission is granted.
10. The Council's Infrastructure Delivery Plan (IFT01) makes reference to a highway improvement at Husum Way roundabout and identifies a cost of £1 million to constructing this. Whilst not an inconsequential sum of money one would hope that this could be funded through the development by the respective parties. As such, BHW do not envisage that the SUE would be held up by the need to implement essential new infrastructure.

5.5 Should specific provisions for affordable housing on the Eastern Extension sites be set out in the policies?

11. No comment

5.6 (i) How will any competing demands on funding for affordable housing, infrastructure and various facilities be resolved? (ii) Overall, are the proposed allocations viable?

12. We understand that the majority of the draft allocation is in the control of a single developer. As such, we would hope that if there were a need for some form of equalisation agreement then all parties would be capable of agreeing this. Clearly with an agreement in place this would make matters simpler in terms of addressing the competing demands on funding for affordable housing, infrastructure and other facilities.
13. At this time, we have no reason to believe that the proposed allocations are not viable.

5.7 Should provision be made for Gypsy and Traveller accommodation within the overall allocation, subject to identified need?

14. No comment

5.8 (i) What is the status of the Development Framework Plan in Appendix B and how should its relationship with the vision in Policy 32.3 and principles of development in Policy 32.4 be clarified? (ii) Should these policies be re-ordered and amended for clarity and effectiveness?

15. It is our understanding that the Development Framework Plan included in Appendix B is a concept masterplan only and has yet to be tested through a planning application. In terms of this relationship could be clarified, the submission of a planning application on the site with an attached masterplan would be the obvious answer. However, if an application was not forthcoming then the Council could consider producing a Supplementary Planning Document and working with developer to produce an agreed masterplan for the site.

16. BHW agree that the Overall Vision for the SUE should come before the site specific requirements.

5.9 (i) Does the policy framework provide clearly and comprehensively for sustainable transport choices and connectivity within and beyond the urban extension? (ii) How will the development be integrated into the public transport network? (iii) How will any adverse traffic impacts of the development be mitigated?

17. No comment

5.10 (i) Overall, are the detailed policy requirements clear, consistent, justified and deliverable? (ii) Will they guide the creation of a major urban extension with high quality buildings and places that relates well to its surroundings and the adjoining built-up area, promotes healthy and safe communities, and conserves and enhances the natural and historic environment?

18. Yes. BHW agree that the policy requirements underpinning the Kidderminster Eastern SUE are clear, consistent, justified and deliverable and that they will result in a sustainable, high quality development where people want to live. The site's accessibility to the town centre means that shops, services and facilities are easily accessible by modes of transport other than the private car. Similarly, the proximity of Kidderminster train station means that the site is well served by train services that link to the wider West Midlands area.

19. In light of the numerous benefits that the SUE can deliver, BHW consider that the Council should look at this location as a possible future expansion area to Kidderminster. The current plan confirms that land is suitable to be removed from the Green Belt around this part of town and in light of the future needs to remove further land from it, BHW contend that this would be a suitable area to investigate.

20. In conclusion, BHW consider a high quality, well designed development with high quality buildings will come forward that will help meet the housing needs of the District in the period up to 2036.