



# MATTER STATEMENT

Matter 6 – Other allocations for housing and mixed uses  
and reserved housing sites

in respect of  
on behalf of  
Seven Homes Ltd – Representor ID: 1192551

3 December 2020  
Client Reference: RCA716b

QMS

DATE 03/12/2020 14:14:13

FILE LOCATION C:\Users\VictoriaLane\RCA Regeneration\RCA Share - General\Jobs\S - U\Seven Capital (RCA716)\Nursery Site, Lickhill Road North, Stourport on Severn (RCA716b)\EiP

AUTHOR VL

CHECKED BY SG

VERSION ISSUED TO

 Client LPA Other

VERSION FOR

 Checking Submission Client

## CONTENTS

1. INTRODUCTION .....	4
2. MATTER 6 – OTHER ALLOCATIONS FOR HOUSING AND MIXED USES; AND RESERVED HOUSING SITES.....	5

## 1. INTRODUCTION

- 1.1. This Matter Statement has been prepared in response to the Inspector's Matters Issues and Questions in relation to other allocations for housing and mixed uses and reserved housing sites. 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 6(ii) on behalf of their client Seven Homes.
- 1.3. The following section sets out our responses to the Inspector's questions.

## 2. MATTER 6 – OTHER ALLOCATIONS FOR HOUSING AND MIXED USES; AND RESERVED HOUSING SITES

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

Q6.1 Is the selection of the other site allocations in each of the identified areas based on an adequate assessment of all potential sites, including sustainability appraisal and assessment of their roles in serving Green Belt purposes?

2.2. We consider that the selection of other site allocations in Stourport-on-Severn has not been based on an adequate assessment of all potential sites. In particular, the site at Bournewood Nurseries (Ref: LI/6) was included in Appendix B to the Sustainability Appraisal Report for the pre-submission draft of the Local Plan (SD04a). It was considered as a result of the Call for Sites and the Officer views recorded that the *“site is well screened from road by mature hedging with much of site being planted. Potential loss of tree cover.”* It was also determined that the vehicular access is good, access to local facilities is good and access to public transport is good.

2.3. The site adjoins the built-up area of Stourport-on-Severn albeit the site is within the Green Belt. It was however discounted from taking the site forward due to highway constraints at the Burlish Crossing.

2.4. We consider that the site has not been adequately assessed and that the highway constraints could be adequately mitigated against. The site is in the control of a developer who has assessed the highways impacts and considers that this can be satisfactorily resolved to a suitable resolution. Indeed, the independent scoping note prepared for the site has determined that there is no impact on junction/link capacity but that this can be discussed in further detail with the Highways Authority. Further detail has been submitted to the Council in the form of a Vision Document which demonstrates how the site could be adequately delivered, limiting the harm to the loss of the openness of the Green Belt, and the introduction of new open spaces, as well as other impacts such as highways.

Q6.1a In particular, have the assessments used suitable methodologies and applied them consistently?

2.5. We would consider that the assessments have used suitable methodologies but have not applied them consistently. In particular, there are other sites within Stourport-on-Severn that are proposed to be released from the Green Belt which would result in greater harm to it than a release of land at Bournewood Nurseries.

Q6.1b In particular, is it clear why the Council has decided to allocate the specific sites and not others?

2.6. No. We do not consider that it is clear why the Council has decided to allocate specific sites and not others. The site selection paper (SSP01) sets out that Stourport-on-Severn meets 72% of its expected growth with 46% being on brownfield sites. We would question the validity of whether the extent of brownfield sites will come forward. Many of the previously developed sites in the District have been longstanding allocations, having appeared in previous development plans. Some of which are still occupied by businesses (Baldwin Road), but apparently are due to deliver housing within the first 5 years of the plan period.

Q6.1c In particular, is the proposed development of each of the allocated sites consistent with the Plan’s vision, aim and objectives and with national planning policy?

2.7. No comment.

Q6.2 (i) Are the specific requirements for development of the sites justified, consistent with national planning policy, and likely to be effective? Do they make sound provisions for the number and types of dwellings, mixed uses and other needs, air quality, noise and flood protection, infrastructure requirements including green and blue infrastructure, and protection and enhancement of the natural and historic environment? (ii) Should provision be made for Gypsy and Traveller accommodation on any of the sites, subject to identified need? (iii) Are the policies clearly written and unambiguous?

2.8. No comment.

Q6.3 Is each of the allocated sites viable and likely to be delivered within the expected timescale? Does the evidence, including any up-to-date information, support the housing trajectory for the individual sites?

2.9. We would refer the Inspector to our earlier Matter Statements in relation to Matters 2 and 3 on this point. In particular, many of the brownfield sites allocated in Stourport-on-Severn are subject to unknown contamination and other site 'abnormals' and many have existing buildings requiring demolition or conversion. All of these factors point to schemes that are unlikely to deliver the planning gain for much-needed infrastructure investment. By their own admission, the Council have a funding gap in the infrastructure required to deliver their development plan aspirations.

Q6.4 Regarding the changes to the Use Classes Order in September 2020, are any modifications required for the soundness of the allocation policies?

2.10. No.

Q6.5 Taking account of the specific characteristics of the allocation sites that are currently within the Green Belt, are there exceptional circumstances that justify the proposed allocations to the Green Belt boundary?

2.11. We consider that there are exceptional circumstances which justify the need to release land from the Green Belt in the District. Wyre Forest by their own admission do not have sufficient previously developed sites that could meet their objectively assessed housing need. Clearly, Green Belt land must be released. However, a robust assessment of all potential sites within the Green Belt which could be utilised for development has not been undertaken consistently. The land at Bournwood Nurseries which is sustainable, has good access to local services, facilities and public transport and, is immediately adjacent to the built-up area of Stourport-on-Severn. Development here would have some impact to the openness of the Green Belt, but it offers an excellent opportunity to deliver a quantum of development within the first five years of the emerging plan period to assist in meeting the challenging housing trajectory set out by the Council and on a site that is low value in landscape and visual terms.

Q6.6 (i) With reference to Policy 7B for the reserved housing sites (a-d) that are defined as Areas of Development Restraint in the adopted Development Plan, is there adequate justification for not releasing them for development in this Plan, while removing other sites from the Green Belt for development during the Plan period? (ii) Is there adequate justification for the identification of Lawnswood, Cookley (Policy 7B(e) ) as a reserved housing site? (iii) Are Policy 7B and the reasoned justification in paragraphs 7.17-7.21 consistent with one another and with national planning policy on safeguarded land?

- 2.12. We have no particular comment on those sites proposed to be listed a-d as previous Areas of Development Restraint (ADR) in the adopted Development Plan. What we do question however, is the quantum of dwellings proposed to be allocated across the reserve housing sites. At just 130 dwellings from 5 reserve housing sites, this equates to around 2% of the housing target. We consider this offers no real flexibility in the plan, as required by the relevant parts of the NPPF/NPPG. We have alluded to this in our previous Matter 3 statement and would refer the Inspector to our responses there, rather than repeat them here.
- 2.13. We consider that the justification in paragraphs 7.17 to 7.21 are consistent with each other and the general thrust of national planning policy on safeguarded land. What we would point out however, is that the NPPF sets out the approach to defining Green Belt boundaries to ensure their permanence and that defensible boundaries are maintained. We do not consider that the Council have allocated sufficient land within the emerging plan period to ensure the permanence of the Green Belt boundary through future plan reviews. This will simply mean that the Council will have to review their Green Belt boundaries again in the next plan review to ensure sufficient land can come forward to meet the housing target for the district. We consider that the Council should consider allocating more sites, like that at Bournemouth Nurseries, as either an allocation or as an ADR to provide more of the flexibility required.