

## **Areley Kings – Save Pearl Lane & Dunley Road from Development**

We are a group of residents opposed to the construction of houses on beautiful fields adjacent to Pearl Lane & Dunley Road, Areley Kings, Stourport-on-Severn, Worcs.

The group was set up in response to the Wyre Forest District Council local plan 2016-2036 which identified site AKR/14 Pearl Lane as a possible development site for 250 homes.

Over 200 local residents have signed a petition against the proposal on grounds of loss of habitats for wildlife, roman remains, an increase in air dioxins along Dunley Road, more traffic congestion at Stourport bridge, history of flooding, loss of walking areas & both Stourport/ Kidderminster still have several areas of brownfield land lying undeveloped.

Barratts Homes along with Harris Lamb Property Consultancy suggested at their exhibition prior to the local plan even being formulated that in their opinion they could get 400 homes onto the site.

The proposed site has appeared in the local press regarding flooding issues.

The proposed site sits within the buffer zone for Areley Wood Site of Special Scientific Interest (SSSI), renowned for its Alder tree collection according to Natural England, a tree that requires damp, wet conditions.

A Facebook site named “Areley Kings – Save Pearl Lane & Dunley Road from Development” was set up & has over 60 members opposed to the inclusion of the site within the local plan.

There are no sites of employment in Areley Kings, apart from a couple of small shops.

Despite promises of a bypass only 1 bridge links Areley Kings to Stourport-on-Severn, Kidderminster & the West Midlands conurbation.

**Re: Major housing development, Pearl Lane/Dunley Road, Areley Kings, Stourport-on-Severn, Worcs.**

**Planning site reference AKR/14. Planning application 19/0554/EIASC.**

**Outline**

Wyre Forest District Council have conducted a local plan consultation up to the year 2036 stating that they will "encourage the use & re-use of available brownfield land" and "safeguard & enhance the open countryside" policy AM6B 2016-2036 WFDC local plan.

The Wyre Forest District Council Plan Preferred Options Sustainability Appraisal Report (May 2017) p29 states "development on land in Areley Kings could have a significant effect on congestion as access over the bridge is at a point which is already congested". It goes on to state "Gilgal in Stourport is an area of concern with poor air quality & additional traffic passing would have a detrimental effect on air quality".

The Wyre Forest District Council Plan Preferred Options Sustainability Appraisal Report (May 2017) p24 goes on to state "there are significant amounts of brownfield land available for development in Stourport- enough to accommodate development without the need for urban extension".

**Wyre Forest District Council Local Plan**

Many residents stated that they were completely unaware of the local plan & of the 250 homes suggested for Pearl Lane/Dunley Road in Areley Kings. Although comments on the local plan are now void many residents stated that they are extremely frustrated & did not receive the small A5 size Wyre Forest District Council flyer regarding "our local plan 2016-2036 pre-submission consultation".

Many of those who had received the small flyer amongst "junk mail" tried to comment on-line & had either experienced difficulties understanding the on-line planning consultation form, while others had sent the form electronically only for it to come back stating that their attempt was "unsuccessful". One resident claimed that she had complained about this via e mail to Wyre Forest District Council but has still not had any reply.

Talking to residents from Lickhill/Burlish and various parts of Bewdley & Kidderminster it was stated that Wyre Forest District Council had advertised the local plan 2016-2036 pre-submission consultation in the local press via the Kidderminster Shuttle newspaper. Unfortunately, Areley Kings residents no longer have the newspaper delivered & were oblivious to the matter. The deadline for comments on the local plan was Monday 14 October 2019.

Having missed the deadline on the local plan consultation in October 2019 relating to 250

homes, the first time many residents in Areley Kings became aware of a proposed development was in December 2019 after some Areley Kings residents received a postal flyer from Barratts Homes. By which time residents were told that they were too late to comment on the local plan as the consultation had been closed.

Barratt Homes along with Harris Lamb property consultancy were preparing a planning application to construct 370-400 homes on agricultural land sited on Dunley Road/Pearl Lane, over the bridge in Areley Kings. This to be located on land which Barratts claim was “set aside” by Wyre Forest District Council in their local plan. An exhibition on December 5<sup>th</sup> 2019 at Stourport Civic Hall (approx. 2 months after the local plan consultation was closed) came as a shock to many Areley Kings residents. The plans exhibited by Barratts & Harris Lamb had several errors contained. For example, Cotswold Avenue was shown as Langdale Road & Areley Kings was misspelt. Together with various other omissions this gave the impression of poor detailing & an overall lack of attention.

Looking at the plans created by Barratts many residents were shocked & upset by the suggested placement of two high rise (ie 3 storey) blocks of flats sitting against the existing bungalows in Longmynd Way. Many of the existing residents have living spaces fronting the fields & many are retired. The placement of high buildings overlooking will have a serious detrimental effect on their quality of life. Many are so worried by the plans they feel that they will be forced out of properties which they have cherished for over 50 years.

Many residents' fears were raised at the meeting including congestion on Stourport bridge & still no by-pass, encroachment into the Areley Wood SSSI (Site of Special Scientific Interest) zone, serious flooding issues, poor planning with the demolition of the adjacent school on Dunley Road reducing school places, this combined with fears that popular open views would be lost & the effect on wildlife including ground nesting birds would be negative.

To summarise, as reported in the local newspaper the Kidderminster Shuttle 21/02/2020 “Wyre Forest District Council Local Development Plan given the go-ahead despite objections”. The article discusses the councils pledge to deliver more than 6,000 homes before 2036, this to include Pearl Lane, Areley Kings. Public speakers it is claimed referred to the “consultation” as “a sham”. Cllr Marcus Hart of the Conservative Party argued “the housing figure which underpinned the local plan was set too high” & stated “therefore his party were not persuaded that it is sound”.

Following the exhibition, a signed petition of over 200 local residents against this Barratt plan & for the removal of AKR/14 from the Wyre Forest development plan was undertaken. This opposed the development on grounds of the loss of habitats for wildlife, roman remains, increase in air dioxins along Dunley Road, more traffic congestion at Stourport bridge, history of flooding, loss of walking areas as well as the fact that both Stourport & Kidderminster still have several areas of brownfield land lying undeveloped. The petition was signed by all age groups as well as by local businesses.

## **Site**

The site in question is purely open agricultural land with many mature trees & is located to the west of the settlement of Areley Kings, Stourport-on-Severn. The site is 15.09 hectares in total.

The fields in question are high grade agricultural land of grade 2. This means of “very good quality”, a wide range of agricultural/horticultural crops can be grown. Land of this quality produces high yields. With few remaining spaces of this calibre in Wyre Forest many residents consider it is appalling that Wyre Forest District Council identified the site for development in the local plan. As the Wyre Forest District Council Plan Preferred Options Sustainability Appraisal Report (May 2017) p29 confirms "land at Areley Kings is high quality agricultural land".

Well over a hundred existing properties fronting Pearl Lane have open views across the site & the fields are well used by walkers from nearby residential areas.

Letters issued by a councillor confirmed that trees planted in the fields were for "landscape protection" with no threat of development.

There is evidence of roman remains to the northern part of the site.

There are no employment sites nearby, no industry, just a handful of small shops in the village.

The local school on Dunley Road adjacent to Heightington Place has now gone. Remaining school, St Bartholomews on the Walshes estate is full with already large classes of 35+.

## **Environment & Wildlife**

Many residents have seen badgers, deer, hedgehogs & various birds & other wildlife within the site.

Skylarks use the site for nesting purposes.

The site falls within the buffer zone of Areley Wood Site of Special Scientific Interest (SSSI). Natural England state “Areley Wood is the largest example of damp alder & oak woods present within the Midlands Plateau”. Re-iterating that development here would encroach open countryside & extra traffic here would push pollution levels high & lead to a new Air Quality Management Area being declared in the town centre as well as drainage issues in Pearl Lane. Natural England go on to state “local planning authorities have a responsibility to ensure that developments which result in negative environmental impacts are avoided & they should robustly consider the full breadth of environmental & other relevant factors when allocating sites for development within a local plan”, 4<sup>th</sup> Feb 2019.

The site in question has very clear open views to Areley Wood SSSI & is just 750 metres approx. away.

Despite such close proximity local authority officers have stated that “no Environmental Impact Assessment is to be carried out” this despite the fact that the site falls clearly within the SSSI

buffer zone. Indeed, in the Harris Lamb Consultancy report prepared by Holly Smith on behalf of Barratt Homes dated 13<sup>th</sup> August 2019 it states on p9 "it is not anticipated that the scheme will require an Environmental Impact Assessment".

Fields nearby at the southern end of Pearl Lane twixt Areley Common, just over the boundary in Malvern Hills District, have been outlined for approx. 70 homes. This in addition to the recreational land fronting The Beams public house on Dunley Road, Areley Kings (between Harold Davies Drive & The Rough) being lost to take the new medical centre for Stourport. Residents are really concerned about the rapid loss of green spaces within the Areley Kings area & the obvious negative knock-on effect for flora & fauna.

The Areley Kings West elections on 25<sup>th</sup> February 2020 witnessed a surge in support for the Green Party & its opposition to "unsustainable & speculative developments on agricultural land". The largest ever vote witnessed for the Green Party in the area, running a very close second place to the ruling Conservative administration. Candidate Luke Clasper supported local people in the call for an Environmental Impact Assessment for the housing development proposal, identifying that the proposal encroaches on a Site of Special Interest impact risk zone.

A Facebook page "Areley Kings – Save Pearl Lane & Dunley Road from Development" has been created.

### **Traffic & congestion**

Stourport is a tourist town with sudden peaks of traffic during bank holidays/weekends/summer Friday's especially car boot congestion. As Policy 5.34 p34 in the Wyre Forest DC Appraisal Report states "Stourport is a bottleneck- traffic can be heavy & slow moving with serious air quality concerns".

The bridge over the River Severn, built in 1870, remains the only means of access to/from Areley Kings. Obviously, the construction of up to 400 homes will lead to more traffic on Wilden Lane & Minster Road as people commute to & from work. There are fears of even more congestion on the Dunley Road A451 with the construction of homes at the Hundred House site in nearby Great Witley.

There are no train services nearby, the nearest being at Kidderminster over 5 miles away distant, there are also no direct bus services from Areley Kings to the train station at Comberton Hill, Kidderminster.

Newspaper the Kidderminster Shuttle 12<sup>th</sup> December 2019 featured an article "Traffic fears as developer unveils plan for 370 homes". Resident Jerry Hjelter whose house sits next to the site argued "the plans are a recipe for disaster & said I find it inconceivable that planners could ever consider any major housing plans on the Areley Kings side of Stourport bridge". He went on to state "Any additional housing in the Areley Kings area can only increase traffic problems as the lack of public transport means residents have no option but to drive to Stourport". Another

worried resident went on to say "I can't believe what they are proposing- the traffic is getting worse & worse".

Public transport provider Diamond Bus were reprimanded for poor time keeping specifically on the Service 3 route Areley Kings to Kidderminster. Following a series of reports from Areley Kings residents the Traffic commissioner had no choice but to intervene. As the Kidderminster Shuttle newspaper reported in August 2018 "Diamond Bus hit with a £9,000.00 penalty for the poor punctuality of services on the problematic Kidderminster to Areley Kings route 3 service". A public inquiry was held at Wyre Forest District Council headquarters where it was decided that Bus Company Diamond couldn't take revenue for a whole week. This being a penalty for poor time keeping issues, specific to the Service 3 route to Areley Kings. Diamond Bus blamed heavy congestion & suffered a loss of revenue totalling £9075.00 as a consequence. The Express & Star report of August 2018 quotes commissioner Nick Denton who branded the number 3 route to Areley Kings as a "problematic" route.

Areley Kings is already suffering disruption as Malvern Hills District Council have approved approx. 70 properties to be constructed against the Wyre Forest district boundary on farmland twixt Pearl Lane/Areley Common. Commenting in March 2014 our local Wyre Forest MP Mark Garnier in an article featuring in the Kidderminster Shuttle "MP slams planning recommendations". MP Garnier states "I fully support opposition to this development which will put too much pressure on the local infrastructure" further straining limited local Wyre Forest services. While we wait for these homes to be constructed Barratt have stepped in with their additional proposal.

Barratts claim to have monitored the road network adjacent & claim that there were no issues. Did the monitoring take place while Pearl Lane was diverted off to through traffic? What about during bank holidays/weekends & summer Friday's especially when the popular Wobbley Wheel car boot takes place, or even the Steam Rally at Coney Green Farm, Ribbesford Road. Obviously, it is too soon yet to see the effect that the additional 70+ homes in addition to the relocation of the medical centre to Dunley Road will have on the flow of traffic over Stourport bridge & town centre.

Bewdley, the next town upstream the River Severn had a similar large-scale housing application on surrounding fields. Bewdley has the distinct advantage of a by-pass, but the plan was rejected due to fears of traffic congestion across the bridge. Stourport with its larger population & no by-pass will be even more congested. Despite promises of a by-pass been constructed nothing has been undertaken.

Stourport-on-Severn has unfortunately experienced several serious incidents of vehicles colliding with properties. The Gilgal, Bewdley Road, Lion Hill to name a few. The shocking images of a car which crashed into a dwelling & destroyed the ground floor forcing residents out for fears of safety on Lower Lickhill Road was reported on BBC Midlands Today. In May 2008 two young men were killed when the car they were travelling in left the Dunley Road & crashed into a tree near the Pearl Lane junction. Large scale developments such as AKR/14 will only

exacerbate this on-going highway problem.

### **Flooding**

The fields have a history of flooding as identified in the Wyre Forest local plan yet still it has appeared as suitable for large scale housing development.

The Environment Agency flood risk map clearly shows that parts of the proposed site are identified as being of flood risk.

The Kidderminster Shuttle 27<sup>th</sup> February 2020 featured a report regarding flooding on the proposed site. Many residents feared concerns including Ms Newhill who stated “there’s an awful lot of water in this area- I can’t believe it, the plan just doesn’t seem to have been thought out properly”. Another resident Mr Wootton stated “It’s a crazy scheme to try & build houses on there, the land is on a slope & water is going to take everything with it”.

Many residents in Cheviot Close, Cleeve Close, Chiltern Close & Langdale Road have experienced flood water run-off from the fields & in to their gardens & homes. Many have photographic evidence.

Pictures identifying the ongoing issues of flooding on both the field itself as well as the problems experienced on surrounding roads & properties are attached to this document.

### **Brownfield sites**

Wyre Forest District contains a plethora of empty homes & brownfield sites.

As at 2017 Wyre Forest District Council identified 778 empty houses within the district many lying abandoned or in a state of disrepair. Even blatantly sitting alongside the proposed development site in Pearl Lane sits a bungalow (105 Abberley Avenue) which has stood empty for 10 years+ just rotting away, while at the same time we are told that there a housing shortage.

Stourport still has many clearly visible areas of brownfield land remaining. The former Lloyds garage in Bridge Street isn't identified in the local plan. The disused land in Vale Road again is not identified in the local plan & could be used. Many of the buildings in Bridge Street are no longer used, abandoned & quite honestly does Stourport need all these vacant, dilapidated shops in the age of computers with more & more people shopping on-line? Parsons Chain although identified in the local plan has been derelict for years, as have the disused garages in Queens Road, Walshes, Areley Kings. The large Co-op superstore is set to close & with the effects of covid recently many further stores including the former Boots store in High Street & A-Z Weddings have been left deserted. Why can't some of these buildings be utilised for housing needs?

Kidderminster, as I'm sure you are aware has even more brownfield land. Quite honestly Green

Street is a disgrace with numerous empty warehouses, plus the former magistrate court in Worcester Street still sits rotting away. As a result of Wyre Forest District Council's local plan well over a hundred residents arranged a walk in Kidderminster town centre to meet MP Mark Garnier at the Town Hall frustrated with the planning departments intent of destroying precious countryside while so many areas of Kidderminster & Stourport are still abandoned. The MP promised to take on board residents views.

Mayor for the whole West Midlands Combined Authority (WMCA) Mr Andy Street comments in an interesting article regarding brownfield sites reported by the Express & Star 31<sup>st</sup> December 2019. Mr Street who has adopted a "brownfield first policy" when it comes to housing said "I simply do not accept the Urban Capacity Review findings that green spaces need to make way for thousands of new homes". "For years the easy option has been taken in too many cases with green fields sacrificed for building homes when brownfield sites have been left derelict". "That approach has got to stop- we need homes to regenerate our urban areas & ease the pressure on remaining green fields". He concludes by stating "the focus must be on regenerating brownfield sites rather than building on cherished fields, we understand the need for new homes, but too often they are built on green areas in deals which benefit developers".

Examples of the many brownfield sites around the Wyre Forest district including empty warehouses, deserted homes & abandoned premises are attached to this report.

### **Conclusion**

To summarise, I urge you to oppose these plans on beautiful high-grade open countryside. With over 200+ residents adjacent to the proposed site signing a petition shows the seriousness of the issue. With issues involving encroachment into the buffer zone of a Site of Special Scientific Interest (SSSI) in addition to ongoing flooding problems, the placement of the AKR/14 site should be removed from the Wyre Forest District Council Development Plan. Various brown field sites remain available for development & hundreds of homes in the district are still unused.

Many of the concerns regarding the site have been raised above, but should you require any further assistance on this matter please do not hesitate to contact me.

Derek Duggan BSc Hon's