

WYRE FOREST DISTRICT LOCAL PLAN (2016-2036) EXAMINATION IN PUBLIC

**Matter 6: Other Allocations for Housing and Mixed Uses; Reserved
Housing Sites**

Persimmon Homes

PPS1694
Hearing Statement

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REPORT

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1 MATTER 6: OTHER ALLOCATIONS FOR HOUSING AND MIXED USES; RESERVED HOUSING SITES

- 1.1 This Matter 6 Hearing Statement has been prepared on behalf of our client Persimmon Homes ('Persimmon') for Wye Forest District Council's ('the Council') Local Plan 2035 ('the Plan') Examination in Public. Persimmon is the site 'Freehold' owner and developer for the Plan's 'Catchem's End' allocation at Bewdley (Policy WA/BE/3). The Statement should be read in conjunction with previous consultation responses RPS has submitted to the Council on behalf of Persimmon in relation to this Local Plan (some of which are referred to in this Statement).
- 1.2 RPS also notes the preparation of a draft Statement of Common Ground ('SoCG'), submitted alongside this Matter Statement as **Appendix 1**. This SoCG was shared with the Council in advance of the deadline for Matter 6(iii), with the intention of presenting a document agreed by both parties. Unfortunately, it has been indicated that the Council is unable to enter into such agreements with developers. As such, the SoCG remains draft, though for the Inspector's benefit seeks to identify those key areas of agreement/disagreement between PH and the Council. Should matters change in advance of the Examination Hearings, RPS and PH would welcome the opportunity to formalise this document, should the Inspector find it appropriate.

6.1 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? In particular:

a) have the assessments used suitable methodologies and applied them consistently?

- 1.3 Persimmon is of the view that the Council has used suitable methodologies in the selection of site allocations. Paragraphs 6.1 and 6.2 of the Council's 'Sites Selection Paper' (ref: EXAM SSP01) identifies the evidence base which has informed the site selection process. This includes:
- Sustainability Appraisal (which looked at all sites in the Council's Housing and Economic Land Availability Assessment)
 - Two Stage Green Belt Review
 - Strategic Flood Risk Assessment and Water Cycle Study,
 - Infrastructure Delivery Plan and Viability Study.
 - Ecological Appraisals
 - Heritage Impact Assessment
 - Transport Modelling

- An Open Space, Built Facilities and Playing Pitch Strategy
- Employment Land Review
- Retail Needs Assessment.

1.4 On the question of whether the methodologies have been applied consistently, Persimmon would make the following points. The Site Selection Paper is supported by a technical appendix which considers an analysis of constraints of each of the potential allocations (ref: EXAM SSP01a) and includes a ‘traffic light’ assessment of Persimmons’ ‘Catchem’s End’ site on page 12). In terms of the appraisal presented, a red score is marked against the site in terms of its location in the Green Belt -an approach consistently taken to all proposed allocations to be removed from the Green Belt. Two further red scores are recorded against the site in respect of fluvial and surface water flooding; however it is noted in the conclusion that the flooding largely affects the parcel of land which is to be proposed for public open space, rather than that for residential development. It is regarded that the assessment does not reflect the area proposed strictly for the residential allocation which, if ranked on the residential component alone, would be assigned more favourable scoring. For clarity, RPS would propose a revision to the site score, which is considered necessary to reflect a robust assessment of the land parcel. In particular, the following is noted:

- Heritage – Yellow to Green – parcel will not have an impact on the Grade II Church of All Saints
- SFRA Fluvial Flooding – Red to Green – Development land outside the floodplain
- SFRA Surface Water Flooding – Red to Green

1.5 The site is also considered in the July 2019 Sustainability Appraisal (‘SA’). As part of the appraisal (ref: EXAM SD04), **Table 5.2** records the site as passing the tests of sustainability, with a number of positive scores awarded. One ‘major negative’ score however is attributed to the assessment, in relation to the impacts on the historic environment. Turning to the detailed appendices of the SA (ref: EXAM SD04a), the assessment indicates that the negative score relates to the western parcel of land (page 205). The eastern parcel which is proposed for development is not referred to in this assessment as it is separated from the Grade II listed building referred to in the assessment, not just spatially, but also through a belt of existing development and vegetation. This distinction is important, as this can be seen to improve the SA score of the site when considered as a whole. We also raise concerns over the robustness of the SA due to the incomplete nature of its assessments which are later relied upon in the report’s conclusions

1.6 Finally, in the Regulation 19 consultation response RPS made on behalf of Persimmon, it was stated that on a fair and proportionate consideration of the evidence presented in the Council’s Green Belt Review (updated May 2018) (ref: EXAM: GB02a) the assessment of ‘significant contribution’ to the purpose of Green Belt had not been robustly derived. In terms of the five Green Belt purposes, the Council had scored the site as making a ‘significant contribution’ against two purposes, as ‘contributing’ to two more purposes, and making a ‘limited contribution’ against one purpose. On this basis alone, RPS considered that the site had not been appraised correctly, and suggest a more reasoned conclusion would be that the site, in overall terms, merely makes a ‘contribution’ towards the purpose of Green Belt when considered on the basis of the Council’s evidence.

- 1.7 Furthermore, RPS disagreed with the Council's suggestion that the site makes a 'significant contribution', in terms of the separation it provides between Bewdley and Kidderminster.

b) is it clear why the Council has decided to allocate the specific sites and not others?

- 1.8 Persimmon is of the opinion that that the Council is clear in why it decided to allocate specific sites and not others. Reasons for taking some sites forward and not others are set out in the various supporting evidence documents / studies, in the SA and in the Green Belt Assessment. Although there are anomalies in these documents (as explained above), Persimmon believes the Council is clear, in the wider context, in how it came to its allocation decisions.
- 1.9 In the context of Bewdley, the Council has presented a strong narrative why the direction of growth needs to be to the east of the River Severn, including land around Catchems End. Land to the west of Bewdley presents a more sensitive location for growth, accounting for landscape/topographical considerations and the historic environment, which creates a greater challenge for growth in this area.

c) is the proposed development of each of the allocated sites consistent with the Plan's vision, aim and objectives and with national planning policy?

- 1.10 As identified above, the Council recognises and acknowledges constrained land to the west of Bewdley (in topographic and historic environment terms) and has developed the strategy for the settlement around this.

6.2 (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?

- 1.11 As identified in our 'Matter 3' Statement, Persimmon would question whether an allocation of 'approximately' 75 dwellings at the 'Catchem's End' allocation at Bewdley (Policy WA/BE/3) makes best and most efficient use of the site when the site has capacity to deliver a greater number of homes. Policy 8A in the Plan identifies a standard of 35 dwellings per hectare (dph), but with the site being some 3.5ha the density at 'Catchem's End' would be delivering at a density of only 21 dph.

- 1.12 It is acknowledged that the site is on the edge of Bewdley, and that it is located within the Green Belt, but in making releases of Green Belt land the Council should be looking to ensure that land identified is used and developed efficiently to maximise the benefits of its release.
- 1.13 It is considered that through careful design (using key buildings etc...) the density could be increased above that within the policy WA/BE/3 to bring delivery in line with policy 8A without impacting upon the local character. RPS and Permission will seek to work with the Council on this issue as a planning application progresses.
- 1.14 The Matter 3 Statement also questions infrastructure delivery as the submitted June 2019 Infrastructure Delivery Plan (ref: EXAM IFT01) only has infrastructure requirements based on the total housing distribution to Bewdley (225 dwellings) rather than on a site-by-site basis.
- 1.15 Persimmon has requested greater clarification on what infrastructure will be required for their site, but this information has not been forthcoming from the council. Until this is available, it is difficult to fully confirm whether there is a reasonable prospect that the necessary infrastructure will be delivered in a timely manner to support the planned development.
- 1.16 Other provisions are made in the policies themselves for example, Policy WA/BE/3 relating to Persimmon's site at 'Catchem's End' requires the following:
- A play area should be provided as part of the open space provision.
 - Site boundaries should be buffered and enhanced to benefit Green Infrastructure connectivity. Mature broadleaved trees along boundary should be retained to help screen the development.
 - Building heights should be limited to 2 – 2.5 storeys to limit impact on setting of All Saints Wribbenhall and Churchyard (Grade II).
 - The western site parcel is allocated as open space. The potential to use some of this land for allotments should be explored with the Town Council.
 - The opportunity to open up Riddings Brook should be investigated.
 - A footpath/cycle link should be provided alongside the Brook to link in with the existing local footpath network.
 - The possibility of providing a footpath/cycle link to rear of Lodge Close through the wet woodland should be explored. This would connect the new housing with the open space on the western parcel. Access into the wet woodland between the 2 sites should be limited to this link path to protect the sensitive habitat.
 - Bat and bird boxes should be integrated into buildings with hedgehog access provided under garden fences.
- 1.17 Persimmon believe these requirements to be clear and justified by the evidence base referred to above at paragraph 1.2 and consistent with national planning policy.

6.3 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

- 1.18 There will be no issues affecting a timely delivery of the ‘Catchem’s End’ allocation at Bewdley (Policy WA/BE/3). Persimmon is the ‘Freehold’ owner and single developer of the site who is currently expanding the evidence base to support a planning application to be submitted shortly after adoption of the Plan. As indicated on the indicative plan for the site (**Appendix 2**), PH consider that the site can be developed to a capacity of around 80 dwellings, supported by infrastructure, including public open space and attenuation. Although higher than the emerging plan figure of 75 dwellings, RPS and PH consider this to be an appropriate density for the site, whilst still providing adequate green buffers.
- 1.19 To demonstrate that the site is ‘deliverable’ as defined in the National Planning Policy Framework (NPPF), Persimmon have advised on the delivery trajectory set out at Table 1. On the presumption that the Plan is adopted in 2021, the start date for the delivery trajectory has been set at 2023-24.

Site name	Location	Capacity	Delivery				
			2021-22	2022-23	2023-24	2024-25	2025-26
Land at Catchems End	Bewdley	c80 dwellings		5	60	15	

Table 1 - Delivery trajectory for Site WA/BE/3

- 1.20 The site will be ‘built out’ and completed within the five-year period from 2021/22 to 2025/26 and will therefore assist the Council in demonstrating a five-year supply of deliverable housing sites.

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

- 1.21 Persimmon has no comment to make on this matter.

6.5 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 alterations to the Green Belt boundary?

- 1.22 The Council consider that Exceptional Circumstances to release Green Belt are justified on the basis that the housing need, identified to be at least 5,520 homes to 2036 (based on 276 dwellings per annum) cannot be physically accommodated within the existing urban areas. Given the emphasis within the NPPF to meet housing need (market and affordable) the Council has considered realistic alternative options through its Local Plan review and the Duty to Co-operate. Existing urban areas and non-Green Belt land has been considered, but existing

- Green Belt land is required to meet the District's housing needs, including identified needs for affordable housing.
- 1.23 The Council's Settlement Hierarchy Technical Paper (ref: EXAM SH01 July 2019) identifies Bewdley as the third most sustainable location within the District, behind the towns of Kidderminster and Stourport-on-Severn, making it an available, deliverable and suitable location for development.
- 1.24 Furthermore, the 2019 Site Selection Paper (ref: EXAMSSP01) indicates that land to the west of Bewdley is heavily constrained, both in topography and in terms of the historic environment (paragraph 12.2) and the most suitable sites to bring forward are to the east of the town. This highlights the importance of the current allocations strategy for Bewdley, and part of the Exceptional Circumstances for Green Belt release.
- 1.25 Paragraph 7.9 of the Paper states (with reference to Bewdley):
"Officers did not wish to overdevelop the town owing to its historical and topographical constraints. However, it was recognised that the town needs to see some development in this Plan Review. Previous plans had severely limited development in the town.... There was widespread support for the Stourport Road Triangle site and land at Catchem's End as long as the setting of the church was protected. They were both considered to be sustainable sites with good accessibility to services and facilities."
- 1.26 Linked to this, the Council's Sustainability Appraisal (SA) (ref: EXAM SD04) states on page 8 of the Technical Summary that:
"Since 2010, almost all development in the district has been on previously developed ('brownfield') land. This is a sustainable approach because it protects green areas, reduces the need to travel, and provides new homes near existing services and infrastructure. However, there is not enough brownfield land in the district to provide for 5,520 homes. More than half of the new homes will need to be built on greenfield land."
- 1.27 The SA also explains over half of the District falls within the West Midlands Green Belt; therefore, it is inevitable that some parts of the Green Belt will need to be developed in order to meet housing targets. The challenge for the Council is to identify the most appropriate sites in the Green Belt for development.
- 1.28 In consideration of the 'Catchem's End' allocation specifically, the SA states (page 8 of the Technical Summary):
"Bewdley needs some development but this should not overdevelop the town's heritage or landscape. The Stourport Road Triangle site and land at Catchem's End are sustainable sites with good access to services and facilities."
- 1.29 The Council undertook a Green Belt Review initially at a strategic level with a Part II based upon site analysis. The Strategic Analysis (ref: EXAM GB01) concluded that areas that make a 'significant contribution' to the Green Belt are predominantly located around the western edge of Kidderminster.
- 1.30 The subsequent Part II Strategic Analysis (ref: EXAM GB02) considers Persimmon's site (as part of a wider tract of land identified as 'Parcel SW2'), noting that the area makes a contribution to the separation of Bewdley and Kidderminster, serving to prevent encroachment and sprawl (Page 6 of Appendix B6 refers). Whilst the appraisal considers that development

would reduce openness and uncharacteristically urbanise the land, it is noted that development here would act as a long-term edge for the settlement.

- 1.31 Whilst RPS agrees with the Council's recommendation to remove Land at Catchems End from the Green Belt for housing, RPS does not agree that the Site makes a significant contribution towards the Green Belt. Although harm to the purposes of the Green Belt has been identified, the sustainability of the location and the potential for further benefits including mitigation provides sufficient justification that the Site can be released from the Green Belt. This is consistent with the Council's aims to deliver a fair share of growth to Bewdley, whilst ensuring that protection is given to land to more sensitive land to the west of the River Severn. As indicated in the Council's Green Belt evidence, the development of this Site will run up to the boundary of the A456, which serves as both a defensible physical boundary but also a feature that ensures the enduring nature of Green Belt to the east.
- 1.32 In addition, RPS does not consider that the Council's assessment has properly considered the impact of the compensatory land offered for public benefit as part of the overall Green Belt assessment. As part of the development proposals, Persimmon Homes is expecting to transfer a land to the west of the site (currently earmarked as public open space on the proposals map) to an appropriate body to be managed as public open space. This site measures around 2.5ha of compensation. On the basis of initial testing, Persimmon Homes considers that the developable area of the residential site (totalling 3.5ha) is expected to be around 2.3ha. The open space provided by Persimmon Homes is therefore expected to serve as a commensurate offset to the development proposals.

6.6 (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?

- 1.33 As identified above, the Council's Settlement Hierarchy Technical Paper (ref: EXAM SH01 July 2019) identifies Bewdley as the third most sustainable location in the District, behind the towns of Kidderminster and Stourport-on-Severn, making it an ideal and suitable location for development.
- 1.34 Bewdley is heavily constrained and as such has seen very limited growth over previous years. Planned growth is important as it helps support local services and facilities and provides a range of new dwelling types including affordable housing to ensure a varied mix of homes to meet local market and affordable need. The Council recognises this, and this is evidenced in the site allocations at Bewdley in the Plan.

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- 1.35 It is noted that there are no 'Reserved Housing Sites' at Bewdley. As such, if any of these sites were allocated instead of the allocations at Bewdley (which has seen limited growth previously) the town would not get the level of support required and there is a real risk that its services and facilities could begin to suffer and decline.
- 1.36 It is therefore important, in the interests of sustainable development and settlement preservation, that all the Bewdley allocations remain in the Plan and are not substituted for any of the 'Reserved Housing Sites' at Bewdley.
- 1.37 Linked to this, it is noted that the first Local Plan Objective (as identified on page 20 of the Plan) is:
"1. To encourage the long term sustainable development of Wyre Forest and its communities."
- 1.38 The housing allocations at Bewdley are very much in-line with this objective. Again, to replace them would not bring about long term sustainable development and could have a negative effect on the town's current sustainability through neglect.