

**Wyre Forest District Council
Statement of Common Ground**

with

Persimmon Homes South Midlands

1. Introduction

- 1.1. This statement of common ground is between Wyre Forest District Council (“the Council”) and Persimmon Homes South Midlands (“PH”), who are represented by RPS Consulting Services Ltd (“RPS”).
- 1.2. PH is the sole landowner and promoter of the proposed residential allocation of ‘Catchem's End’ (“the Site”) in Bewdley town. The land is proposed for allocation as site WA/BE/3 under Policy 34.3 of the Submission Wyre Forest District Local Plan 2016-2036 (“WFLP”). The indicative capacity of the allocation is 75 dwellings.
- 1.3. This Statement of Common Ground (“SoCG”) sets out the areas of common ground and disagreement between the two parties in relation to the Site. It focuses only on matters relating to the developability and deliverability of the site, including addressing specific areas of supporting technical evidence base, its consistency with the Wyre Forest Core Strategy 2006-2026 and Site Allocations and Policies Local Plan 2006-2026 and the National Planning Policy Framework (“NPPF”). It does not discuss wider policy matters raised by PH through their representation to the WFLP.

2. Need for Green Belt Release at Bewdley

- 2.1. The Council’s Settlement Hierarchy Technical Paper [EXAM SH01 July 2019] identifies a list of settlements in the District, ranked in terms of sustainability (pages 8 and 9 refer). On this list, Bewdley is ranked as the third most sustainable location, behind the towns of Kidderminster and Stourport-on-Severn.
- 2.2. In terms of future locations for growth in Bewdley, the evidence underpinning this strategy is outlined as part of the 2019 Site Selection Paper [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 refers) and the most suitable sites to bring forward are to the east of the town. In terms of apportionment, the Site Selection Paper goes on to note that the current allocations strategy will only be providing for 34% of what would be expected in terms of a stock-based approach. This highlights the importance of the current allocations strategy for Bewdley, and part of the Exceptional Circumstances for Green Belt release.

3. Technical Evidence Supporting the Deliverability of WA/BE/3

Availability

- 3.1. In terms of availability, the Site is owned freehold by PH, who would act as the sole developer of the Site, with a commitment to delivery in the early years following Plan adoption. PH are also the freehold owner of land to the west of the Site, which is proposed to be transferred to an appropriate body (preferably Bewdley Town Council) for the land to be classified as public open space.

Suitability

- 3.2. PH has developed an initial evidence base to better understand the context of the Site and factors affecting capacity. On the basis of current evidence, PH consider that the Site is capable of supporting around 80 dwellings, a 6% increase on the indicative capacity of 75 dwellings as expressed in draft Policy 34.3. This figure has been derived through consideration of site-specific evidence, aligned with testing of PH' house types, to best utilise the land whilst ensuring a good standard of design.
- 3.3. RPS considers that this increase above the emerging policy remains consistent with the broad thrust of the Plan and national policy, which expects an effective use of land using appropriate densities. The delivery of around 80 dwellings on this Site would equate to a density of 23 dwellings per hectare ("dph"). This is lower than the Council's expectation of 35dph on greenfield sites in town centres (Draft Policy 8A), but considered to strike the right balance between growth and the local characteristics of the Site and surroundings.

Green Belt Release & Compensation

- 3.4. Noting the Council's Exceptional Circumstances for Green Belt release, RPS considers that the Site represents a strong location for growth, and the impacts on the Green Belt are justified and can be lessened as part of site-specific mitigation.
- 3.5. RPS notes that the Council's Green Belt assessment has been prepared without the benefit of detailed designs for the Site, including a landscape strategy that could demonstrate how the impacts of development here could be appropriately mitigated. Although harms to the Green Belt have been identified, the sustainability of the location and the potential for further 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.
- 3.6. 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. In line with Emerging Policy 34.3 (3), a green buffer will be provided along the northern boundary, which will soften the impact of the site coming into the town and provide an element of open space. The impact of this offset was not considered as part of the Council's Green Belt evidence, and RPS considers that this provides further mitigation to the impact of the Green Belt.
- 3.7. Furthermore, in the context of NPPF Paragraph 138, the Site is capable of providing compensatory improvements for the loss of the Green Belt, in the form of the land parcel to the west. PH is in a position to offer the western parcel of land to be gifted to an appropriate body, which will be secured in perpetuity as open space. The western parcel is not presently accessible to the public, and the offering will enable the land to benefit the existing community of Catchems End, in addition to the new development proposed by PH.

Site Deliverability

- 3.8. The Site is considered to score well in terms of planning suitability (as evidenced on page 12 of EXAM SSP01a and Table 5.2 of EXAM SD04), however PH offer further justifications beyond the Council's evidence base, informed by evidence prepared in advance of submitting a planning application for the emerging allocation.

Landscape Impact

- 3.9. The landscape context of the Site is contained by the combined influence of road and settlement infrastructure and the more natural combinations of landform and vegetation. The enclosure of the Site is then reinforced by surrounding land uses and features. Landscape character is defined by the Worcestershire Landscape Character Assessment (Supplementary Guidance, 2011). The Site is located in an area defined as the 'Sandstone Estatelands' Landscape Type (in a transitional area with the adjacent 'Principal Timbered Farmlands' LT).
- 3.10. A Preliminary Landscape and Visual Appraisal has been prepared, which concludes that effects on landscape character will occur at a site level and its immediate landscape context with little influence on the wider character of Bewdley. A full Landscape and Visual Impact Appraisal is currently in preparation, which will consider proposals for existing and green infrastructure and open space that respond to local landscape characteristics and consequently avoid or reduce landscape and visual effects.
- 3.11. In terms of landscape buffers, PH would anticipate that a buffer will be provided along the north eastern boundary, adjacent to the roundabout, and along the northern boundary following Kidderminster Road. Beyond this, the proposed development will include an increase of planting and appropriate internal buffering to be determined following a detailed layout and orientation.

Access and Transport

- 3.12. The Site will be accessed via a priority junction on Kidderminster Road, which represents the most appropriate area to serve the Site. Appropriate visibility can be achieved at the Site access junction which has been calculated using observed speeds. It is noted that there will need to be some removal of vegetation along the northern boundary to gain access to the Site, however this will be limited to enabling works only.
- 3.13. The Site currently comprises undeveloped land and is bound to the north by Kidderminster Road and to the south by the A456. The site forms an extension to the eastern extent of Bewdley. Kidderminster Road provides connections to Kidderminster to the east while the A456 connects to Stourport-on-Severn to the south.
- 3.14. Bus stops are located adjacent to the site on Kidderminster Road and are served by the number 2, 125, 291 and 292 bus services, providing connections to Kidderminster, Stourbridge, Bewdley and Bridgnorth. These services provide a minimum of two buses per hour during weekday daytimes to these locations, providing a realistic option for sustainable travel to employment locations within the surrounding area, as well as for shopping, leisure and education purposes.
- 3.15. A Transport Assessment will be prepared as part of the forthcoming application.

Flood Risk and Surface Water Drainage

- 3.16. The Environment Agency ("EA") Flood Map for Planning illustrates the eastern parcel of land to lie within Flood Zone 1; the lowest classification of flood risk. A drainage channel crosses the western parcel of land which puts parts of the Site within a 'low' to 'high' risk area of flooding. This parcel will be retained as open space and the land conditions and flood risk will be taken into consideration to enhance the ecological potential of the Site and make for the best possible community resource.
- 3.17. The majority of the development parcel is at 'very low' risk of surface water flooding. However due to the topography of the Site there is a small area of 'low' to 'high' risk of surface water

flooding in the north east of the Site. This does not pose a risk of flooding to the proposed residential development as it will be managed by levels, open space and a sustainable urban drainage system. Taking into account the local features on the Site, it is proposed that this attenuation basin will be located in the north east corner, as part of the public open space offering.

- 3.18. On-site attenuation will be included within the masterplan layout to ensure there is no detriment to downstream recipients of surface water, both in terms of water quality and quantity.

Ecology

- 3.19. The Site principally comprises of well managed agricultural land which is generally considered to be species poor and of low biodiversity value. The most valuable habitats on Site are the trees, hedgerows and woodland which all fall on the boundaries of the Site. These will be largely retained and protected by a buffer of open space, with the exception of creation of a new access which will require removal of a relatively small area of vegetation on the northern boundary to allow for access and visibility. This will be approached in conjunction with the Council's arboricultural officer.
- 3.20. The Site boundaries will be buffered by open space and enhanced to improve ecological connectivity around the Site. Historic woodland bordering the Site is identified as a woodland priority habitat and a woodland improvement area. As with the other boundary vegetation this will be retained and enhanced by the proposals.

Development Status

- 3.21. PH are committed to early delivery from the Site, and a full application is currently in development, which is intended to be submitted to the Council in advance of the adoption of the Local Plan.
- 3.22. Although PH does not expect development proposals to be determined until the plan is sufficiently developed, a front-loaded process is expected to give greater certainty to the Council of early housing delivery, to address the historic undersupply of growth to Bewdley.

4. PH Regulation 19 Consultation Response

- 4.1. PH is the site promoter and developer with a controlling interest in the whole of the Catchems End site (WA/BE/3) and is supportive of the site's allocation in the WFLP. There are however elements of Policy 34.3 which PH considers are not sound and could, with relatively minor modifications, be made sound. The matters raised by PH are not replicated below, but are clearly set out as part of our Regulation 19 Representations, available to the Inspector.

5. Delivery of Site WA/BE/3

- 5.1. To demonstrate that the site is 'deliverable' as defined in the NPPF, PH have advised on the delivery trajectory set out at Table 1. On the presumption that the Wyre Forest District Local Plan is adopted in 2021, the start date for the delivery trajectory has been set at 2023-24. It is anticipated that a full application will be submitted to the Council, giving a greater certainty of delivery in the period immediately following adoption of the Plan.

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

Site name	Location	Capacity	Delivery				
			2021-22	2022-23	2023-24	2024-25	2025-26
Land at Catchems End	Bewdley	80 dwellings		5	60	15	

- 5.2. As shown at Table 1, the site will be 'built out' within the five-year period from 2021/22 to 2025/26. Site WA/BE/3 will therefore assist WFDC in demonstrating a five-year supply of deliverable housing sites.

6. Areas of Common Ground

- 6.1. WFDC and PH are agreed on the following matters:
- The site is deliverable and developable as defined in the NPPF. It is available for development now and it will be delivered within the five-year period starting from the adoption of the Wyre Forest Local Plan.
 - Bewdley is one of the most sustainable settlements in the District based on its level of service provision and its accessibility to employment and rail services.
 - Bewdley has been historically constrained in terms of housing delivery and needs to be able to grow to meet future housing need. The providing housing site allocations at the settlement would be consistent with the role of the settlement identified in Policy 6E.
 - That the analysis of the Site as part of the Council's Site Assessment Paper [Appendix 1] relates to land wider than that proposed for residential development, and that the proposed allocation is not known to flood from fluvial or surface water sources. Additionally, that the impact on heritage identified in the 2019 SA is related not to the proposed development parcel, but the parcel to the west, which PH intend to remain undeveloped, and opened up for public access;
 - Parties agree that subject to evidence of good design and site efficiencies, the Site could yield growth beyond the indicative figure of 75 dwellings stated in emerging Policy 34.3.
 - There are exceptional circumstances that justify the release of Site WA/BE/3 from the Green Belt, and an offset is provided in the form of the transfer of land into public open space, providing a compensatory arrangement.
 - The Site can be served by a single point of access, capable of being taken directly onto Kidderminster Road, and whilst it is accepted that this will involve the loss of some vegetation, PH will look to compensate for through the development.

- The Site should look to provide a mix of units, in line with PH house types, though it is expected that the majority would be 2 and 3 bed units, in line with the local aspiration for starter homes and to encourage new families into the area.
- Parties agree that the north east corner of the Site represents the most appropriate area to locate the sustainable drainage arrangements, linked to the topography of the Site. In addition to the open space buffer on the northern flank, parties agree that a landscaping strategy which increases cover along the eastern boundary and along Kidderminster Road will assist in mitigating impact and attenuating noise from the adjacent roads.
- Parties agree that there are no abnormalities which would prevent the viability of the Site and that evidence on this matter can be made available, if needed, to support the Examination process.
- Parties agree that opportunities for walking and cycling will be explored, in line with emerging Policy 34.3, however there is no need for a dedicated cycle route through the Site.
- It is agreed that the western parcel of land (to be used as public open space) should in the first instance be offered to Bewdley Town Council for adoption, though could be dealt with by a management company in the event that the Town Council does not want to take ownership of the Site.
- It is agreed that the residential component of the Site is sufficiently screened from the west and that there will be no impact on the Grade II Listed All Saints church, which is adjacent to PH's land proposed to be transferred as public open space.

7. Areas of Disagreement

7.1. The minor areas of disagreement between WFDC and PH are as follows:

- PH consider that the emerging allocation should be amended to around 80 dwellings, to make optimal use of the site area;
- Site WA/BE/3 makes a 'significant contribution' to the Green Belt in line with the Council's evidence base. RPS considers that the assessment should be amended to 'contribution';
- Soundness amends to draft Plan policies, as indicated in the RPS Regulation 19 submission.