

Matter 6: Other Allocations for Housing and Mixed Uses; Reserved Housing Sites
Matter 6(iii) Bewdley

Response on behalf of

Euro Property Investments Ltd.

MATTER 6

Introduction

1. Harris Lamb Property Consultancy (HLPC) are instructed by Euro Property Investments Ltd. (EPIL) to prepare a response to the Inspector's issues and questions in relation to Matter 6. EPIL are promoting land at Stourport Road, Bewdley for residential development and the site is currently proposed to be removed from the Green Belt and is identified as a draft housing allocation in the Plan under Policy WA/BE/1. EPIL support the proposed allocation but have some specific concerns about the wording of the specific policy for the site. Our comments to Matter 6 should be read in this context. We set out our detailed responses to the Inspector's questions below.

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?

2. Yes, we consider that the Council in assessing the site have used suitable methodologies and that they have applied them consistently. The Site Selection Paper (SSPO1) and Appendix 1 of it (SSPO1a) set out the process that the Council employed when assessing sites and considering their suitability for allocation. The Appendix 1 to the Site Selection Paper lists the different issues that were considered for each site and used a traffic light system to assess each of these. Having considered the assessment of each site a conclusion was reached as to its suitability for allocation.

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

3. Yes, referring again to Appendix 1 of the Site Selection Paper (SSPO1a) this details in the Conclusion column why certain sites were and were not deemed suitable for allocation. The findings more generally are also reported in the Site Selection Paper as decisions were made by the Council during the different stages of preparing the Plan as to when sites were to be removed or additional sites to be added, and the reasoning behind this is stated here.

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?

4. The Plan's Vision seeks to deliver new housing in the three most sustainable settlements in the District and to balance housing growth with job creation, helping those of working age to remain in the District. Specifically, for Bewdley the Vision seeks to ensure Bewdley remains as a thriving market town and that its historic character is preserved. In our view the proposed allocations for Bewdley will help to ensure the Vision is met.
5. Furthermore, having regard to national policy we consider that the proposed allocations (again focussing on Bewdley) will meet the objectives of delivering sustainable development, making efficient use of land and helping boost the supply of housing. As such, we consider that the proposed allocations are consistent with the Plan's Vision as well as national planning policy.

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?

6. Our response to this question focuses on the proposed allocation of land at Stourport Road, Bewdley (WA/BE/1 or the Triangle site). On the whole we agree that the proposals for the site will be effective particularly in relation to the capacity of the site. The Vision Document that accompanied our representations to the Pre-Submission Draft consultation set out a thorough assessment of existing conditions at the site including highways, flooding and drainage, ecology, heritage, noise, landscape and visual impacts. These were all considered in light of the proposed allocation for residential development and concluded that none of these would present any constraints which could not be satisfactorily accommodated in the successful development and subsequent early delivery of the site.
7. Furthermore, the baseline conditions were considered when preparing a concept masterplan for the site that demonstrated that other policy requirements such as the need to provide SUDS on site, provide Green Infrastructure and where to locate public open space on the site could all be achieved whilst still being able to deliver up to 100 dwellings as per the allocation. The promoter is currently preparing a planning application for the site and intends to lodge this with the Council shortly. The submission of the application at this time is intended to demonstrate to you that the site is deliverable and that there are no technical or environmental constraints that would prevent its development. As such, we consider that the proposed allocation is justified and consistent with national planning policy and will be effective in delivering much needed new open market and affordable housing for Bewdley in the early part of the Plan Period.

(ii) Should provision be made for Gypsy and Traveller accommodation on any of the sites, subject to identified need?

8. No comment.

(iii) Are the policies clearly written and unambiguous?

9. Whilst in principle we support the proposed allocation, we raised a number of detailed comments about the wording of Policy WA/BE/1 and the changes that we are seeking to it in

our representations to the Pre-Submission Draft version of the Local Plan. On the whole, the changes sought do not change the substance of the Policy or undermine what the Council are seeking to achieve through allocating the site, more that revisions are needed to ensure that EPIL are able to deliver a fully policy compliant development. Specific concerns were raised about the requirement in Part 1 of the policy that requires the existing gate in the wall of the former walled garden to be made available for pedestrian use. EPIL stated that the wall and the gate is outside of their control and as such, this policy requirement was not within their control to deliver. EPIL have no objection to the gate being made available for pedestrian use if the owner could be established by the Council and they were minded to deliver the linkage under their statutory powers as Local Planning Authority Alternative options have already been made for pedestrians and cyclists that are within the control of the promoter and will be approved under the grant of planning permission. As such, the development has no dependency on this gate being made available. Accordingly, we are seeking the deletion of the requirement to secure access through the gate/wall.

10. Part 3 of the policy seeks to restrict building heights to two storeys only due to potential adverse impacts on nearby heritage assets. We consider that this is unduly restrictive and not founded on credible evidence. Furthermore, the height of the proposed development can be adequately controlled once an application is submitted and which will be accompanied by a Heritage Assessment. The Heritage Assessment will consider whether three storey development (if this is even proposed) will adversely affect the nearby heritage assets and it will be down to the Council to consider this at that time, and if they do consider that there will be an unacceptable adverse impact then they will be able to seek an amendment to the scheme at this time. The promoter is not seeking or intending on proposing three storey development across the whole site and is very much of the view that the introduction of varying heights across the site can contribute to a better overall design and quality of development. The policy is, therefore, seeking to prevent something that may have little or no impact on heritage assets and which can be adequately controlled during the course of the determination of a planning application. The change that we are seeking is:

“3. Development should be designed to minimise adverse impact on both the SVR and Bewdley Conservation Area. Building heights should generally be restricted to 2 storeys to minimise impact on views from/to Winterdyne House (Grade II*).”

11. Part 5 of the policy requires SUDS to be provided. These would be proposed anyway through a detailed drainage design and to ensure that the site was adequately drained. Whilst the promoter has no in principle objection to the inclusion of this requirement we question whether it is necessary to be included in the policy. We suggest that this part of the policy is deleted.
12. Similar to above, Part 6 of the policy requires the submission of a site specific Flood Risk Assessment (FRA). As the site is larger than 1 hectare in size, an FRA would be required to be submitted anyway so again we question whether it is necessary to include this requirement in the policy. Our preference would be for it to be deleted as the need for an FRA is effectively covered elsewhere and would be required anyway.
13. In respect of Parts 7 and 8 of the policy, these appear to be a duplication. We suggest one should be deleted as it appears to be a minor drafting error.

14. Notwithstanding the above, the requirement to provide soft landscaping results in very little to no acoustic screening and, therefore, if the intention is to seek mitigation along the site boundaries from noise, we do not consider that soft landscaping will have much of an effect. However, if the policy is worded so that landscaping could mean hard landscaping such as fencing, the need for this would have to be justified. Our view is that there would only be a need to provide mitigation along the boundaries if, following a noise survey, it had been demonstrated that there was something that needed mitigating and that mitigation should be sought. We, therefore, propose that the wording of the policy is amended so that it requires an assessment of background noise conditions to be undertaken and that if following the results of the survey, mitigation is required, that a scheme of mitigation is submitted and approved. Parts 7 and 8 should be replaced by (or other wording to be agreed):

“A Noise Survey should be undertaken to establish existing background noise levels across the site. Should the findings of the survey indicate that these may adversely impact upon the amenity of new residents, then measures should be incorporated within the development to mitigate against this.

Hedgerows should be protected and enhanced, especially along the northern boundary to promote connectivity to nearby woodland.”

15. Our suggested wording of the policy as a whole should read:

“Policy 34.2 - Stourport Road Triangle WA/BE/1

The parcel of land is removed from the Green Belt and allocated for residential development.

1. Northern part of site adjacent Severn Valley Railway viaduct should remain as open space with no built development. ~~This is the site of the former walled garden (non-designated heritage asset). The wall to the former walled garden of Sandbourne House is to remain intact with the existing gate in the wall used to provide pedestrian access into the site~~

2. Development should respect the setting of the locally listed viaduct (northern boundary) and coach house and barn (west of site)

3. Development should be designed to minimise adverse impact on both the SVR and Bewdley Conservation Area. Building heights should generally be ~~restricted to 2 storeys~~ to minimise impact on views from/to Winterdyne House (Grade II*).

4. Enhanced green infrastructure should be provided alongside the Riddings Brook with a buffer strip provided alongside

~~5. SuDS should be provided on site to deal with additional surface water run-off. These can be used to enhance amenity areas and provide wildlife habitats.~~

~~6. A detailed site specific flood risk assessment should be undertaken to confirm the extent and depths of flooding in the future and ensure that finished floor levels will be above any future flooding levels~~

75. A Noise Survey should be undertaken to establish existing background noise levels across the site. Should the findings of the survey indicate that these may adversely impact upon the amenity of new residents, then measures should be incorporated within the development to mitigate against this.

6. Hedgerows should be protected and enhanced, especially along the northern boundary to promote connectivity to nearby woodland.

~~Enhanced landscaping should be provided along the site boundaries to provide noise buffering. Hedgerows should be protected and enhanced, especially along the northern boundary to promote connectivity to nearby woodland~~

~~8. Enhanced landscaping should be provided along the site boundaries to provide noise buffering. Hedgerows should be protected and enhanced, especially along the northern boundary to promote connectivity to nearby woodland"~~

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?*

16. Whilst we cannot speak for all the other sites that are included in the as to their viability and deliverability we would expect that over the course of preparing the Plan that the Council were satisfied that they were deliverable and viable. We can, however, confirm this to be the case with the Stourport Road, Bewdley site in that it is a viable development proposal and that is it the promoter's intention to secure planning permission and to take the site to market to be developed out by a housebuilder. To this end, work has commenced on the preparation of a planning application and the pre-application advice of the Council has been sought as to the scope and nature of the planning application, now on two occasions in the last 18 months. It is the intention of the promoter to lodge the application with the Council in the New Year.

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

17. In respect of the Stourport Road, Bewdley site the changes to the Use Classes Order have no bearing and the allocation does not need to be modified to reflect these.

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?*

18. Yes. Please see our response to Matter 3 which sets out why we agree that there are exceptional circumstances to release land from the Green Belt.

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?

19. No comment.