
Matter 6(iv) Hearing Statement

Wyre Forest District Local Plan Examination
Response on Behalf of Gaynor Gillespie and W4
Estates Limited

Representor ID: 859769

Questions: 6.6



Contents

1. Introduction	1
1.1. Introduction.....	1
2. Matter 6: Reserved Housing Sites	1
2.1. Question 6.6.....	1

1. Introduction

1.1. Introduction

- 1.1.1. Savills has been instructed by Gaynor Gillespie and W4 Estates Limited to submit a Hearing Statement in response to Matter 6(iv) (Question 6.6) of the Wyre Forest District Local Plan Examination.
- 1.1.2. Gaynor Gillespie and W4 Estates Limited are promoting land (ref WFR/ST/1) that was shown by Wyre Forest District Council (WFDC) to be included within the proposed Core Housing Site to the east of Kidderminster within the Preferred Options consultation document, but was removed by WFDC from subsequent consultation stages of the emerging Local Plan.

2. Matter 6: Reserved Housing Sites

2.1. Question 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?”.

- 2.1.1. The NPPF¹ makes specific reference to identifying areas of safeguarded land between the urban area and the Green Belt where necessary, when defining Green Belt boundaries, in order to meet longer term development needs stretching well beyond the Local Plan period. Local authorities also need to be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period². The principle for being able to safeguard land has therefore been established in national planning policy.
- 2.1.2. It is noted that, with the exception of WFR/WC/12 (Lawnswood, Cookley), the proposed reserved housing sites are all former Area of Development Restraint (ADR) sites which WFDC is proposing to continue to

¹ NPPF paragraph 139 c).

² NPPF paragraph 139 d).

safeguard for future housing development. It is recognised that the 'in principle' suitability of these sites for housing development has already been considered through the previous Local Plan reviews and although these sites have not been developed so far it is understood that this is due to the sites not being required to meet the District's housing needs rather than due to any specific issues with these sites or their immediate context. It is also noted that the 0.31ha of site WFR/WC/12 identified for development "*would have minimal impact on Green Belt*"³.

- 2.1.3. The WFDC settlement hierarchy⁴ shows that the Main Town of Kidderminster is at the top of the settlement hierarchy and is therefore the most sustainable settlement in the District. Kidderminster is described within the settlement hierarchy as being the focus of large scale housing provision and a location where appropriate brownfield and greenfield sites should be developed subject to the provisions of the more detailed policies of the Local Plan. Therefore the choice of Kidderminster as being the focus of the majority of the residential allocations, located both within and on the edge of the settlement in the Green Belt, is considered to be appropriate.
- 2.1.4. In considering potential sustainable locations for additional allocations for this Plan period, if required, the approach should accordingly reflect the settlement hierarchy starting with the Main Town of Kidderminster, then the Large Market Town of Stourport-on-Severn, followed by the Market Town of Bewdley. None of the proposed safeguarded housing sites are immediately adjoining the built up area of Kidderminster (or adjoining the other main towns) or can accommodate a significant quantum of development. It is therefore understandable why WFDC has chosen a strategy of removing land from the Green Belt for allocations in specific locations in advance of releasing the identified reserved housing sites for development in this Plan period.
- 2.1.5. Reserved housing sites are still however considered to play a role as part of the Local Plan strategy. If site-specific constraints or other considerations do delay or slow down the delivery of development on some of the allocated housing sites then it will be important for WFDC to be able to still demonstrate that it does have a wider suitable and flexible supply of deliverable sites in sustainable locations which can come forward to assist with maintaining a five year housing land supply position against the Local Plan housing

³ Examination Document SSP01a Sites Selection Paper Appendix 1: Analysis of constraints affecting potential allocations. WFR/WC/12.

⁴ Examination Document SD01. Wyre Forest District Local Plan Review Submission Document (January 2020). Table 6.0.3.

need target. As acknowledged in the supporting text to the proposed policy⁵, and unless alternative sites are allocated through a further (partial) review of the Local Plan, reserved housing sites “*provide the first option to consider for development if sites are not available to meet the desired requirement in other, sequentially preferable locations*”.

- 2.1.6. As set out in our client’s response to Matter 2⁶, the most recent household projections for the District are higher than the level of growth currently chosen by WFDC as its housing need figure for the Local Plan period. If WFDC does not acknowledge and plan for this projected increase within this Local Plan review then it should be mindful of the anticipated future requirement to plan for meeting an increased need, both through making additional allocations in the next Local Plan Review and ensuring the ability of WFDC to demonstrate a deliverable five year housing land supply position based on a greater housing need position.
- 2.1.7. The expectation is that future Local Plan Reviews will also find that there are insufficient previously developed sites within the urban areas to meet the housing need and therefore there will still be a need to review and alter Green Belt boundaries. There is accordingly considered to be a need to give regard to the requirement for Green Belt boundaries to endure beyond the end of the Plan period by safeguarding additional land in suitable and sustainable locations as part of the current Local Plan review process.
- 2.1.8. The total identified capacity within the current proposed reserved housing sites a-e amounts to 116 dwellings⁷. This would not make a significant contribution to the housing land supply and is accordingly not considered to be sufficient to meet the anticipated increase in local housing need and resultant pressure for further releases from the Green Belt. It is contended that WFDC should accordingly be planning for additional reserved housing sites, notably around the edge of Kidderminster, if it does not increase its local housing need figure from the 5,520 dwellings currently identified for the new Local Plan period.
- 2.1.9. If it is ultimately demonstrated through the Local Plan Examination process that the current Local Plan strategy does not require the allocation of land at Captains (in site WFR/ST/1) for residential development

⁵ Examination Document SD01. Wyre Forest District Local Plan Review Submission Document (January 2020). Paragraph 7.19.

⁶ Gaynor Gillespie and W4 Estates Limited response to Matter 2.

⁷ Analysis based on Examination Document SSP01a Sites Selection Paper Appendix 1: Analysis of constraints affecting potential allocations: WFR/WC/23 (14 units); WFR/WC/22 (26 units); WFR/WC/10 (30 units); MI/21 (37 units); and WFR/WC/12 (9 units).



then this site should be included as a reserved housing site to ensure the proposed strategy is robust, takes account of the available evidence, maximises the contribution that previously-developed land can make to

- 2.1.10. the achievement of the Plan's objectives and assists with enabling the longer term permanence of Green Belt boundaries. Further details for land at Captains is provided within our client's responses to Matters 1, 3 and 5⁸.

⁸ Gaynor Gillespie and W4 Estates Limited responses to Matters 1, 3 and 5.

