

## **STATEMENT OF REPRESENTATIONS**

### **WYRE FOREST DISTRICT LOCAL PLAN 2016-2036**

#### **MATTER 6(V): QUESTIONS: 6.1/ 6.2/ 6.3/ 6.5**

#### **SPATIAL STRATEGY**

#### **OTHER ALLOCATIONS FOR HOUSING AND MIXED USES**

#### **RURAL WYRE FOREST**

#### **MARMARIS INVESTMENTS LTD**

#### **REPRESENTATION REF: 1188945**

#### **1 Exception Circumstances**

- a. The Green Belt Study Part 1 concludes the inset status of Blakedown should be continued and there is "*potential for modest expansion*", see ED20 paragraph 4.11.
- b. Blakedown is a sustainable settlement, having a good range of facilities: pub, shop, school, railway station and so on.
- c. The need for housing to meet assessed need / the requirement set out in the plan of 276 DPA provides the exceptional circumstances for land release at Blakedown (see ED20 paragraphs 8.1-8.15).
- d. The Green Belt Review concluded the site at Station Drive was the only site suitable for release at the village (ED20B, page 54). Thus, for the village to expand and grow, this site is in reality the only option (the only other site in the village allocated in the plan being within the urban area, small and not suitable for housing).
- e. Thus, the alteration of the green belt boundaries in this part of Blakedown and the allocation of the site for housing and car parking in this plan is supported by relevant exceptional circumstances. It represents a logical and sustainable development location.

## **2 Alleged Harm to the Green Belt**

- a. It is alleged by some representations to the plan that the release of the site for development causes unacceptable harm to the green belt in this location.
- b. This is not accepted for the reasons set out below,
  - i. Appendix 1 of ED20 page 57 sets out the site has an overall “*contribution*” to the green belt, rather than “*slight contribution*” or “*significant contribution*”.
  - ii. This document further confirms this contribution is limited to “*containment*” of the village (reference page 57), and so development of the site will not lead to other harms such as coalescence, landscape impact and so on. Every green belt site has a containment role to the settlement adjacent to it, so this contribution is not specific to this site.
  - iii. The site is well contained by existing vegetation, and following an appropriate landscape reinforcement scheme implemented as part of a subsequent application, the boundaries of the site can act as appropriate landscape edges to the village in a stronger way than the current boundaries (as required by ED20). Thus, containment to the village can be maintained.

## **3 Locational Advantages of this Site**

- a. The allocated site at Station Drive is well contained by two firm manmade features, the railway line and Birmingham Road (east and west), with a natural slope to the outward boundary of the site. Thus, its release will not lead to pressure for further outward expansion of the village, as noted in the Green Belt Assessment (ED20B page 55).
- b. The site is next to Blakedown railway station and the bus stops on Birmingham Road, so fulfils the locational guidance at paragraph 138 of the Framework to focus development where it has good links to public transport options.
- c. The site lies close to the primary school and shop in the village and is within walking distance of all village amenities.
- d. Blakedown is proven as a location where the market can and will develop and sell homes pursuant to this allocation.
- e. The site is of a scale that can include a variety of housing styles and sizes, including affordable housing.

- f. The site provides the opportunity to create station related car parking as may be required by the Transport Strategy that underpins the plan (subject to growth post COVID returning demand to pre COVID levels).

#### **4 Technical Aspects**

- a. In support of the allocation of the site various technical studies have been submitted to the Council. These are available to this Examination and cover aspects such as landscape / ecology, noise and vibration, transportation and access.
- b. There are no viability issues raised in the development of this site for the uses proposed in the plan.

#### **5 Mixed Uses**

- a. The plan allocates the site for station related car parking and housing.
- b. The parking element if required following the 2021 re-evaluation, will be brought forward and financed by Worcester County Council as part of the wider rail related upgrading of the train services on this line.
- c. The ability of the site to contribute to increased use of sustainable transport is an added benefit that flows from the release of this site.

#### **6 The Suggested Modifications (March 2020)**

- a. MA/36.1, this amendment is noted and accepted. The detail of this can be included in a subsequent planning application.
- b. MA/36.2, follows our suggested wording amendments and gives the policy the required degree of flexibility at the application stage.
- c. MA36.3, "*no dwellings are to be constructed until car parking has been approved on site*", is vague and ambiguous. It does not reflect the latest position of the WCC rail strategy, which requires a reassessment of the demand for rail usage during 2021 post COVID. Only at that stage will it be known if part of the site is required for station related car parking. The suggested "*reason for change*" does not support the proposed wording in any event.
  - i. The site is released from the green belt arising from the green belt study, not via an exceptional circumstances route relating to the provision of the car park.
  - ii. The requirement for an approval of a scheme for the parking element of the allocation does not reflect the latest position of WCC. This should be omitted. If required, which we do not support, the policy should at most state "*Any*

*application for the site should set out if rail related parking is required and if so, deal with both the housing and car parking elements so a comprehensive solution is approved”.*

- iii. There should be no constraint on bringing forward this housing in the local plan policy wording, it is unnecessary. The housing is required to ensure housing needs are met within the District as a whole.
  
- d. MA/36.4, the first of these amendments follows our suggested wording amendments and is acceptable. The second amendment wording relates to the EA requirements and is also acceptable.