



Wyre Forest District Council Local Plan 2016-2036

Examination

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

*(Matter 6(iii) Bewdley (Section 34); Matter 6 (iv) Reserved
Housing Sites (Policy 7B); Matter 6(v) Rural Wyre Forest
(Section 36))*

[Note: Gypsy and Traveller/Travelling Showpeople sites will be considered in Matter 8; employment sites and previously developed sites in the Green Belt will be considered in Matter 9]

Wyre Forest District Council Response

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Wyre Forest District Council

Wyre Forest District Local Plan (2016-2036) Examination

Matter 6: Other Allocations for Housing and Mixed Uses; Matter 6(iii) Bewdley (Section 34) Matter 6 (iv) Reserved Housing Sites

(Policy 7B); Matter 6(v) Rural Wyre Forest (Section 36) [Note: Gypsy and Traveller/Travelling Showpeople sites will be considered in Matter 8; employment sites and previously developed sites in the Green Belt will be considered in Matter 9]

Q6.1 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?

- 6.1.1 The Council considers that the site assessments have used suitable methodologies and that they have been applied consistently.
- 6.1.2 All potential sites were initially assessed through the Housing and Economic Land Availability Assessment (HELAA) (HOU04/04a). The methodology for this was prepared in accordance with the NPPF and the NPPG at section ID3. The HELAA aims to identify sites and broad locations with development potential, assess their potential and suitability, and finally their likelihood of actually being delivered. Chapter 2 of HOU04 sets out the methodology used. The majority of this work was undertaken by Council officers. However, an independent panel of specialists met over a series of weeks to discuss all the potential sites put forward in terms of their likelihood of being developed.
- 6.1.3 The Sustainability Appraisal also assessed all of the potential allocations. A framework of sustainability objectives was developed for assessing the suitability of both the proposed policies and individual sites. A Policy Framework with 13 SA objectives has been used to assess the impacts of the Local Plan's vision and objectives, strategic options and policies. A specific SA framework was developed for the sites. This was revised in response to comments received at Preferred Options consultation and also to make it more practical and useful. To avoid duplication, the SA information was integrated into the HELAA site forms. Table 5.2 of the SA shows how the sites scored against the SA objectives.
- 6.1.4 A Green Belt Review has also been undertaken. This divided the Green Belt within Wyre Forest into 59 parcels for survey. Interested parties were consulted on the study methodology in May/June 2016. The

methodology is based on that developed by Land Use Consultants and which has been informally agreed by various West Midlands authorities. The method deliberately does not use scoring to arrive at judgements as this would create problems of consistency. A common survey proforma is used for the different parcels. A Stage 2 assessment was then undertaken looking at smaller parcels which were being considered as potential allocations. The same methodology was used as at the strategic level first stage.

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

- 6.1.5 The Site Selection Paper (SSP01/a/b) outlines the process undertaken starting with Issues and Options Consultation in 2015 followed by the Preferred Options Consultation in 2017. A number of evidence base studies were commissioned in 2016 and many of these studies showed potential delivery issues with some of the existing unconsented / unimplemented allocations. One of the key issues to come out of the 2017 Consultation was a wish to limit Green Belt release and revisit the potential pool of brownfield sites to see if there were any that could be redeveloped for residential use.
- 6.1.6 The involvement of the Local Plan Review Panel was key to the process of discussing site selection. This group consisted of District Councillors across all parties together with representatives from the three town councils. This Panel met a number of times to discuss sites and it was concluded that there was insufficient brownfield capacity to meet identified housing need and for the first time since 1974, Green Belt boundaries would have to be reassessed. The final development strategy builds on that of the Adopted Core Strategy (2010) which concentrated development on urban brownfield sites.
- 6.1.7 The appendices to the Site Selection Paper list those sites which were considered earlier on in the process and subsequently removed together with the reasons for those decisions. In terms of Bewdley and the rural sites, Appendix 2 lists 5 sites that were deleted after Preferred Options consultation together with the reasons. Appendix 3 lists 5 sites in Bewdley and 19 in the rural villages which were submitted at Preferred Options via the Call for Sites but did not get taken forward as allocations. The decision was taken to have a policy (18B) which would cover small infill sites within the villages subject to certain criteria. This meant that many of the sites previously included at Preferred Options could come forward through this policy and would not require a specific allocation. Appendix 4 lists 1 site in Bewdley that was added in at Pre-Submission stage. This site was the Bewdley Fire Station which was due to be closed as planning permission had been granted for the new Wyre Forest

Emergency Hub which would see all 3 fire stations merged onto a single site. There were also 7 sites, mainly located within rural villages and hamlets, which were added in at this stage for residential uses. These are mostly in areas washed over by Green Belt. The largest site is at Blakedown where a mixed residential and station parking scheme is proposed. Justification for this allocation is included at Appendix 6 of SSP01.

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?

6.1.8 The aim of the Local Plan is to set out:

- the areas where development will take place.
- the areas that will be protected; and
- policies that will be used to determine planning applications.

6.1.9 The site allocations are consistent with the NPPF:

- Paragraph 8 by ensuring that there are sufficient homes built meeting the identified need.
- Paragraph 15 by ensuring a positive vision for the future of each area...addressing housing needs.
- Paragraph 67 ..." planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability".
- Paragraph 127 by ensuring that the site allocations "optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks."

6.1.10 The site allocations are consistent with the aim and spatial vision of the Local Plan, sites are allocated in areas where the Council consider that the sites are sustainable locations whilst protecting other areas of the District where site allocations have not been proposed. This complies with Plan objective 1 which encourages long-term sustainable development. Part C of the Submission Plan, Proposed Allocations, outlines specific detailed policies for each site.

6.1.11 The Council considers that all of the site allocations in Bewdley and Rural Wyre Forest are consistent with the spatial vision and objectives together with a Plan aim to address housing needs in order that existing and future residents' requirements are met ... (objective 3) when read alongside other Plan policies. The site allocations also are consistent with

plan objective 5 maximising the use of previously developed land ensuring the best use is made of available land.

6.1.12 Bewdley as a small market town is the focus for some growth within the Plan period; however, it is important that the towns maintain their distinctive and separate identities. Many of the allocations will also aid the vision of the Rivers Severn, Stour and their tributaries and the Staffordshire and Worcestershire Canal together with green infrastructure providing valued links for both wildlife and residents both within Bewdley and Rural Wyre Forest. (vision 1).

6.1.13 All of the proposed allocations directly support Objectives 1-3 to encourage sustainable development, address key challenges around housing, employment, health and transport.

Q6.2(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?

6.2.1 The specific requirements for the sites within the Local Plan are drawn from the conclusions within the evidence base documents assembled during the plan preparation process including the site selection methodology (SSP01), green infrastructure concept statements (GI01-GI03), Preliminary Ecological Appraisals (GI06-GI08), the Heritage Impact Assessment (HSR01), Strategic Flood Risk Assessment (FR01), and the Infrastructure Delivery Plan (IFT01).

6.2.2 Paragraph 29.7 within the Local Plan (SD01) outlines the structure of the sites allocations within policies 30 to 36. The policies also set out the specific requirements for the individual sites, which are consistent with the National Planning Policy Framework (NPPF). The specific requirements as outlined within the individual site policies will be delivered by developers and through S106 agreements.

6.2.3 The number and types of dwellings proposed within the Local Plan are drawn from the Housing Need Study (HOU01) which has evidenced the overall requirement for 276 new dwellings per annum plus 487 C2 institutional units over the whole plan period. The overall mix by dwelling type, size and tenure is summarised in Table 7.6 (HOU01). Table 8.0.1 shown in Policy 8A of the Submission Local Plan reflects this data. It should be noted that this data will be subject to regular review. The Plan period will see an increased demand for smaller two- and three-bedroom dwellings and a reduction in demand for four-bedroom dwellings. This is

due to a variety of factors such as rising divorce rates, desire for downsizing in later life, and newly forming households as youngsters set up on their own. The average household size in the district is expected to be 2.1 by 2036, compared to 2.25 for Worcestershire as a whole, and 2.34 for England¹. The employment land provision and specific site allocations are drawn from the 2018 Employment Land Review update within the evidence base (ECON04).

- 6.2.4 Bewdley has an existing Air Quality Management Area (AQMA) at Welch Gate in the town centre. Policy 16A states that development proposals must be designed to avoid significant adverse impacts from pollution on the AQMAs. Air quality together with topography and impact on the historic core is one of the key constraints limiting new development on the western side of the River Severn. Air quality within Bewdley in the Plan period will be positively affected by the recent decision by the UK government to end the sale of new diesel and petrol cars by 2030 as part of the Green Revolution Plan². Policy 24B in the Local Plan also includes a requirement that all new developments should include electric car charging points. Appropriate noise mitigation measures have been referenced for the relevant specific site policies, which is consistent with paragraph 180 of the NPPF.
- 6.2.5 The specific requirements contained in a number of the site policies in relation to flood protection have been informed by the Strategic Flood Risk Assessment (FR01) within the evidence base. The Local Plan has applied a sequential risk-based approach to the location of development, consistent with paragraph 157 of the NPPF and the Flood Risk Sequential Test Assessment of Proposed Development Sites (FR02)
- 6.2.6 The specific requirements for the sites are considered to make sound provision for each site and are justified by the Infrastructure Delivery Plan within the evidence base (IFT01) to meet paragraphs 92-94 of the NPPF. This is a living document that details both the infrastructure required to support the proposals, the development sites in the plan, and the likely delivery partners. The IDP sets out future capacity requirement for education, health, utilities, community space and transport. Additionally, Travel Plans will be required for all major developments (Policy 13).
- 6.2.7 In terms of green and blue infrastructure, new development will be expected to retain, protect and enhance Green Infrastructure (GI) assets by integrating GI into developments and contributing positively to the District's green infrastructure network (Policy 14). Where appropriate,

¹ WFDC Housing Topic Paper (June 2020), paragraph 4.9 (ED3)

² <https://www.gov.uk/government/news/pm-outlines-his-ten-point-plan-for-a-green-industrial-revolution-for-250000-jobs>

specific site requirements have included proposals to take into consideration the comments made by the Worcestershire GI Partnership (GI04).

- 6.2.8 Within table 3.0.1, the vision of Wyre Forest District by 2036, section 2 addresses the natural and historic environment, in that '*The District's varied natural habitats, together with its diverse and historical landscapes are thriving, and offer a range of outdoor interests, contributing to local educational opportunities and sustainable tourism*'. Any proposal that is likely to affect the significance of a heritage asset will have a specific requirement to submit a Heritage Statement with the planning application.
- 6.2.9 As outlined in paragraph 29.7 of the Plan, as well as any site-specific policies set out in Chapters 34 Bewdley and 36 Rural Wyre Forest, any provisions of other relevant policies must also be taken into consideration by developers.

Q6.3 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?

- 6.3.1 The 2018 Wyre Forest Viability Update (IFT06) considered the deliverability of the development sites in the emerging Plan together with updates to the NPPF and PPG. In May 2019, the viability section of PPG was changed in relation to the establishment of the Benchmark Land Value (BLV). Viability assessment now uses Existing Use Value (EUV) as the starting point. The updated PPG (10-010-2018072) states that the purpose of viability testing is to ensure that the aim of the planning system to secure maximum benefits in the public interest through the granting of planning permission has been met.
- 6.3.2 Different site typologies were tested – large brownfield, smaller brownfield, large greenfield, medium greenfield and small greenfield. These different typologies were developed having regard to the potential sites identified through the HELAA. The greenfield sites were also split between east and west of the River Severn. A total of 25 site typologies were modelled (see table 9.5 in 2018 Local Plan Viability Update (IFT06). Initial viability was tested with 30% affordable housing and a S106 contribution of £2000 per dwelling. This showed all the brownfield typologies to be unviable as they would not generate a Residual Value greater than the Existing Use Value. However, these types of site have consistently come forward in Wyre Forest and have delivered affordable housing.

- 6.3.3 The Council is confident that the proposed allocations will come forward as set out in ED11. These tables show the indicative 5-year phasing period for when the sites will be developed.
- 6.3.4 Details of the progress on each of the sites can be found in ED12/12a WFDC Engagement Statement. Site capacities may still change on those sites yet to enter the Development Management process.
- 6.3.5 In Bewdley, a planning application has recently been submitted for site BR/BE/1. This application is for a mixed-use scheme consisting of a small supermarket with six flats above. Although this proposal is not purely residential as envisaged by Policy 34.1 Bewdley Fire Station, it is in conformity with the existing policy SAL.BE1 which allows for small-scale retail use to meet local need. This application has been submitted following pre-application discussions. Pre-application discussions have also been held about site WA/BE/1 and an outline planning application is expected prior to the owners selling the site onto a housing developer. Pre-application discussions have also been held in autumn 2020 on the other 2 proposed sites at Catchem's End (WA/BE/3) and Land South of Habberley Road (WA/BE/5). Thus, it can be shown that all the allocations proposed in Bewdley are well advanced and likely to be delivered within their expected timescales. It also suggests that the owners / developers have confidence in their viability. The Inspector's attention is also drawn to the fact that these allocations have the support of Bewdley Town Council.
- 6.3.6 Of the 9 proposed residential allocations in the rural areas, only one, that at Alton Nurseries on Long Bank near Bewdley (BR/EO/21), has a planning permission in place. The pre-start conditions have been discharged/agreed. An application was received at the end of August 2020 for 3 bungalows and 1 2-storey dwelling at site WFR/CC/8 in Chaddesley Corbett. A decision is awaited. An outline application was also submitted for site WFR/WC/37 in Caunsall in late 2019. This was refused on the grounds of inappropriate development in the Green Belt as it did not meet the definition of limited infilling in villages as per paragraph 145e of the NPPF. The Housing Topic Paper (ED3) at Appendix 3 discusses how the proposed allocations align with parish housing needs surveys. It should be noted that in Upper Arley, the allocation for 10 dwellings on the allotments has ecological constraints and may be only able to accommodate a far smaller number of dwellings. Most of the proposed rural allocations are on brownfield sites. All the sites were submitted through the Call for Sites and are available for development.

Q6.4 Regarding the changes to the Use Classes Order in September 2020, are any modifications required for the soundness of the allocation policies?

- 6.4.1 In September 2020 the Town and Country Planning (Use Classes) (Amendment) (England) Regulations amended the Town and Country Planning (Use Classes) Order 1987 (UCO). Significant changes to the system of use classes were introduced. They include the reclassification of a number of uses. Class B1 which includes offices and light industrial are removed and incorporated within a new Use Class E which also includes previous use classes A1 (Shops), A2 (Financial and professional services), A3 (Restaurants and cafes), D1 (Non-residential institutions) and D2 (Assembly and leisure). Change of use to another use within Class E will be allowed without the need for planning permission.
- 6.4.2 The change to the Use Classes Order does not make changes to residential and therefore all of the housing allocated sites will be unchanged. A number of sites allocated in the Submission Plan are mixed use sites.
- 6.4.3 The Submission Plan lists the following allocations as mixed-use sites.

Table 6.4.3 Mixed Use Sites

Site Ref	Site Description	Details of mixed use.
BR/RO/21	Alton Nurseries, Long Bank	Residential and employment use.
WFR/CB/3	Land off Station Road	Residential and car parking.

- 6.4.4 To protect the integrity of the Local Plan and the amenities of residents and other sensitive uses within the vicinity of employment developments amendments to the policies for mixed use sites could be made. This does not include the two sites that are 100% residential as there is no change to policy required. The policies for mixed use sites could , if required, be subject to a condition through planning permission:

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking or re-enacting that Order with or without modification), the premises/building(s)/site(s) shall be used for shop/offices/research and development/light industrial and for no other purpose including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 2020, (or in any provision equivalent to that Class in any statutory instrument amending, revoking and/or re-enacting that Order with or without modification.

Reason: In order to define the permission in accordance with Policy 31.1 of the Wyre Forest District Local Plan and the National Planning Policy Framework.

6.4.5 Table of sites where Use Class is or is not listed.

Site Ref	Site Description	Policy changes
BR/RO/21	Alton Nurseries, Long Bank	No use classes listed in policy, no policy change proposed.
WFR/CB/3	Land off Station Road	No use classes listed in policy, no policy change proposed.

Q6.5 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?

- 6.5.1 There are three proposed residential allocations on Green Belt sites in Bewdley and a further 7 in the rural areas. Only one of the rural sites will require alteration to the Green Belt boundary. The other 6 small rural allocations are in areas 'washed over' by the Green Belt.
- 6.5.2 The Site Selection Paper (SSP01) sets out the process undertaken by the Council from initial Issues and Options consultation in 2015 to the sites as proposed in the submission Local Plan. Any proposal for residential development in and around Bewdley has to be carefully weighed against the constraints of a tight knit historical core and topographical constraints on the western side of the River Severn. This means that if Bewdley is to meet its development needs, land will need to be released from the Green Belt. Greenfield sites outside of the Green Belt to the west of the river were judged to have landscape, ecological and accessibility issues, and development on this side of town would also potentially exacerbate existing air quality issues. As a result, three sites on the eastern side of the river are proposed for removal from the Green Belt. The lack of suitable sites to meet the development needs of the town contributes to the 'exceptional circumstances' for releasing them from the Green Belt.
- 6.5.3 The Green Belt Topic Paper (October 2020) (ED20) concludes that site WA/BE/1 makes a Contribution to Green Belt purposes but has strong boundaries (Bewdley Bypass and Stourport Road) and thus any effect on sprawl or encroachment would be limited. The site is well placed to make an important contribution to meeting the development needs of Bewdley. It lies in a sustainable location with schools and leisure facilities opposite and is within a level walk to the town centre facilities. The benefits associated with the release of the site from the Green Belt are judged to outweigh the disbenefits. The Housing Topic Paper Appendix 4 Analysis

of Constraints affecting Potential Allocations (ED3) demonstrates that the site performs well across the evidence base as a whole. Early sketch plans show that the site can deliver approximately 100 dwellings but still provide 40% green infrastructure.

- 6.5.4 Site WA/BE/3 consists of two separate land parcels in the ownership of a national housebuilder. The eastern parcel is a gateway site into Bewdley adjacent to the bypass. Development here is judged in the Green Belt Topic Paper (ED20) to make a 'significant contribution' to Green Belt purposes as it forms part of the wider tract of land that separates the three towns. Development of this parcel would bring the edge of Bewdley out to meet the A456 although this would then act as a long-term edge. The western parcel of land is proposed as open space to serve this part of Bewdley. This will help to protect the historic setting of All Saints Church. This western parcel will also provide compensatory recreational provision for the release of the eastern parcel for housing. The design of the development is very important to mitigate some of the 'urbanisation' of this gateway site.
- 6.5.5 Site WA/BE/5 is a smaller land parcel which is judged to meet Green Belt purposes moderately. Any impacts on the Green Belt can be mitigated to some extent by site design. This site forms part of an important gap between Bewdley and Kidderminster which also contains a hotel and its extensive grounds. It is important to create a firm new boundary to inhibit any further expansion into this gap in the future.
- 6.5.6 There is one allocation in the rural villages which will require land to be released from the Green Belt. WFR/CB/3 is adjacent to the railway station at Blakedown and thus situated in a very sustainable location. It also satisfies a housing requirement shown by the Parish Housing Needs Survey. The site is judged to meet Green Belt purposes moderately. The site has clear boundaries of roads and railway on three sides with a wetland corridor on the fourth. Thus, it can be shown to have firm defensible boundaries. It is considered that the benefits of releasing this site for a mixed-use transport hub and housing scheme outweigh any disbenefits to the Green Belt.
- 6.5.7 The proposed allocations which will remain washed over by the Green Belt are all judged to either make a limited contribution or a contribution to Green Belt purposes. The benefits of releasing 3 of them for limited development are judged to outweigh the disbenefits – WA/UA/4 & 6, WFR/WC/36. The other sites at Shatterford, Chaddesley Corbett and Caunsall Road are all judged to compromise openness to a certain degree. However, they are considered to be in sustainable locations and will meet an identified local housing need.

Q6.6(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?

6.6.1 The Sustainability Appraisal (SD04) has considered the alternative sites for development in the district. The SA has also assessed the sustainability impacts of Policy 7B 'Reserved Housing Sites in the Green Belt'.

6.6.2 The Sustainability Appraisal report (SD04) assessed Policy 7B in the Local Plan and found positive and neutral impacts of policy on SA Objectives. There were some minor negative impacts identified but no mitigation was proposed. The SA assessment of Policy 7B is shown in table below. Further justification is provided in the Green Belt Topic Paper (ED20).

Policy 7B. Reserved housing sites in the Green Belt		
SA objectives that are not relevant to this policy	1, 2, 4, 10	
SA objective	Impact of policy	
3. To ensure that the housing needs of all residents and communities are met	+	Allows for housing provision in the Green Belt under restricted conditions
5. To reduce the need to travel and move towards more sustainable travel modes; to reduce associated effects of air quality & greenhouse gas emissions	+/-	The policy allows development in the Green Belt in a number of locations, most of which are on the edge of towns and so help to minimise the need to travel.
6. To protect soil & land	-	The policy allows some development in the Green Belt. Most of this will be on greenfield sites, with consequent impacts to soil, water/flooding, the landscape, biodiversity and the historic environment.
7. To protect water resources and quality; reduce flood risk.		
8. To protect and enhance landscape and townscape		
9. To conserve & enhance the District's biodiversity and geodiversity		
11. To protect & enhance the historic environment & its settings	-	The policy aims to minimise development in the Green Belt, but releases some sites in the Green Belt.
12. To maintain the integrity of the Green Belt within the District.		
13. To maintain & enhance community & settlement identities	0	By restricting what can be built in the Green Belt, this policy helps to maintain the strategic gaps between the district's settlements, and therefore their identities.

Policy 7B. Reserved housing sites in the Green Belt	
SA objectives that are not relevant to this policy	1, 2, 4, 10
SA objective	Impact of policy
Possible mitigation	

Source: SA Report (July 2019) (SD04)

6.6.3 The land in the southern section of site BW/4 is proposed as a Green Gap on the Policies Map. This is the larger southern part of the Hurcott ADR site which was removed from the Green Belt in a previously adopted Plan. The smaller northern part is being redeveloped for 91 dwellings by Miller Homes. The proposed green gap consists of a large dry valley with higher ground to the south. Immediately abutting this site to the south are two SSSIs; Hurcott Pastures (dry) and Podmore Pools (wet). Any adverse hydrological impact on these sites from developing the southern part of the ADR would cause habitat deterioration. This land is also a sensitive landscape as it frames the setting of Hurcott village with its mill and pool. Hurcott village dates back to the middle ages when monks were known to have made paper there. Paper making continued until the 1970s. Hurcott Lane forms the eastern boundary to this site. It is a narrow historic lane with characteristic sandstone cuttings. It is not considered suitable for access to this site. This site should therefore not be released for development and should instead be protected as a 'green gap'.

6.6.4 Policy 7B states that the Reserved Housing sites will be brought forward for development either through the Neighbourhood Plan process or the next Local Plan review. This is to give local communities that are preparing Neighbourhood Plans a greater influence on the type of development that takes place in these areas in the future. This is consistent with the corporate approach of the Council through its 'Localism' agenda which is empowering local communities to operate services and take decisions at the community level. However, if the Inspector does not agree with the approach the Council has taken with its former ADR sites, then the Council would consider releasing the following former ADR sites for residential development, subject to the Inspector's approval:

- Land off Hayes Road, Fairfield (WFR/WC/23)
- Land off Lowe Lane, Fairfield (WFR/WC/22)
- Land off Kimberlee Avenue, Cookley (WFR/WC/10)
- Land off Wilden Top Road, Wilden (MI/21)

6.6.5 In total, these sites could generate an additional 107 dwellings to the overall housing supply for the district.

Q6.6(ii) Is there adequate justification for the identification of Lawnswood, Cookley (Policy 7B(e)) as a reserved housing site?

- 6.6.6 The Lawnswood site was originally submitted as part of the first SHLAA in 2008. At that stage, no sites within the Green Belt needed to be considered for allocation. A few years later, Council Officers were involved with a walkabout around Cookley village with some members of the Parish Council – an affordable housing subgroup. This also involved the then rural housing enabler for Worcestershire. Lawnswood was one of the sites visited by the group. At the time, the local councillors were very keen to consider a small part of the former garden as a rural exception site as it would deliver other benefits to the community besides affordable housing. They were not keen on the existing ADR at Kimberlee Avenue as that was remote from the existing village centre, whereas Lawnswood had the potential for a formal footpath access direct onto Lea Lane to access the sports facilities, school, church and GP surgery.
- 6.6.7 The site also scored well across all the Local Plan evidence base studies. The allocation for this small part of the landholding is justified in that it would meet the demand for a medium-sized development (9 dwellings approx.) which could meet local housing needs in the village but, in addition, could also allow for sustainable pedestrian linkages through to the village centre from the top part of the village.
- 6.6.8 The Lawnswood site is located within the Cookley and Caunsall Neighbourhood Plan area, which was formally designated as a neighbourhood plan area on 19th September 2018. The flexibility of Policy 7B will enable the Parish Council to allocate the Lawnswood reserved housing site in their neighbourhood plan for housing to meet local needs. The Council invites the inspector to agree that adopting this 'local' approach is sound.

Q6.6(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?

- 6.6.9 The Council is of the opinion that Policy 7B and the reasoned justification in paragraphs 7.17-7.21 are consistent with national planning policy on safeguarded land. Policy 7B provides flexibility should the Council not be able to demonstrate a five-year housing land supply or where the Housing Delivery Test has not been satisfied. The sites allocated as Reserved Housing Sites will provide the first option to consider for development if sites are not available to meet the desired requirement in other, sequentially preferable locations. Inappropriate development on non-allocated sites within the Green Belt will not be the 'first port of call'.

6.6.10 The Council considers the flexible approach in Policy 7B to adapt to rapid change (particularly in government policy and 'housing need' methodology) will support sustainable development and help to prevent speculative development elsewhere in the district in less sustainable locations.