



WFDC/Matter 7

# **Wyre Forest District**

# **Site Allocations and Policies Plan**

# Examination

Matter 7: A Unique Place

WFDC Response

14<sup>th</sup> January 2013

### Matter 7 - A Unique Place

#### 1. Are policies SAL.UP1 & UP6 consistent with the Framework?

### Policy SAL.UP1 -Green Belt

- 1.1 One of the Core Planning Principles set out within the Framework (SD001) refers to the protection of Green Belts. SAL.UP1 seeks to protect the Green Belt from inappropriate development. Section 9 of the Framework provides the detailed guidance for protecting Green Belt land. The section starts by setting out the 5 purposes of the Green Belt as established in PPG2. These purposes were the basis for the original Green Belt designation in the Hereford and Worcester County Structure Plan.
- 1.2 Paragraph 82 of the Framework requires planning authorities to plan positively to enhance the beneficial use of the Green Belt. Policy SAL.UP1 recognises that outdoor sport and recreation are appropriate uses of the Green Belt.
- 1.3 In accordance with paragraph 83 of the Framework, the Site Allocations and Policies Plan seeks to continue the existing West Midlands Green Belt designation. In accordance with the Core Strategy (SD003), a full review of the Green Belt boundary is not considered necessary at this time. Therefore, the Green Belt remains safeguarded in its entirety. The Plan also retains the Areas of Development Restraint (ADRs) in order to make provision for long-term development needs, with the exception of the Blakedown ADR which is now allocated for residential development in the Site Allocations plan.
- 1.4 Paragraph 89 sets out the circumstances in which new development within the Green Belt will be allowed, these are reflected in points i-v and points a-c of policy SAL.UP1. A number of minor amendments have been proposed to the policy to bring the criteria set out in points i-v into line with the criteria set out within the Framework (SALMOD28 and SALMOD29). This includes the re-wording of point ii to reflect the Framework, the widening of point iii to include replacement buildings of all uses rather than just replacement dwellings and the inclusion of a point relating to development approved under a Community Right to Build Order.

#### Policy SAL.UP6 – Safeguarding the Historic Environment

- 1.5 Paragraph 7 of the Framework sets out the three aspects of sustainable development social, economic and environmental. The protection and enhancement of the historic environment is recognised as part of the social aspect of sustainable development. This is also recognised at paragraph 9 of the Framework which sees sustainable development as involving "seeking positive improvements in the quality of the built, natural and historic environment". The Framework sets out 12 core planning principles, one of which relates to the conservation of heritage assets in a manner which is appropriate to their significance. Policy SAL.UP6 seeks to conserve and enhance the historic environment in with these elements of the Framework.
- 1.6 Chapter 12 of the Framework relates specifically to conserving and enhancing the historic environment and requires local authorities to set out in their Local Plan "a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk." The District Council considers that SAL.UP 6 sets out a positive framework for the conservation and enhancement of the historic environment. It is considered that the suggested revisions to the policy as a result of representations made at the Publication stage, together with further discussions held with English Heritage under the Statement of Common Ground (SOCG2), further improve the policy's consistency with the Framework. This is particularly relevant in relation to the emphasis which the Framework places on significance and on the range of both designated and non-designated assets. The amendments also provide a more positive approach to addressing proposals which secure the future of a heritage asset which is at risk. This strengthens conformity with paragraphs 129 and 140 of the Framework.

### 2. Will the policies in the SAPDPD deliver open space?

2.1 Yes. The Adopted Core Strategy (SD003) provides the strategic framework for delivering open space through new development. Objective 5 of the Adopted Core Strategy recognises the importance of delivering green infrastructure and policy CP13 sets out the requirements for green infrastructure in new developments. Policies SAL.UP3 and SAL.UP 4 will ensure that development contributes to the network of green and blue infrastructure within the District. This will include the delivery of open

space in accordance with the current Planning Obligations SPD (SD012). The District Council considers that the table at Appendix D, which sets out the required standards for open space, should be deleted. This is taken directly from the Open Space, Sport and Recreation Assessment (EB045) and sets out the quantity, quality and accessibility standards established through that report. In order to future proof the Site Allocations and Policies DPD it is considered that this table should be removed. A modification has been introduced to provide further clarification and this is set out at SALMOD71.

#### 3. Should the SAPDPD identify the amount of space required for green infrastructure?

- 3.1 No, it is not considered necessary to identify the amount of space required for green infrastructure.
- 3.2 Green infrastructure is an over-arching theme within the Adopted Core Strategy (SD003) and the development strategy for the District. Development objective 5 of the Adopted Core Strategy recognises the importance of safeguarding and enhancing the District's landscape character and natural environment as well as delivering green infrastructure. Policy CP13 establishes the basic principles for development delivering green infrastructure. Policy SAL.UP3 sets out more detailed information on the green infrastructure requirements within new development generally and the site specific policies provide further details on the requirements for individual allocated sites.
- 3.3 The Green Infrastructure Strategy (EB047) has identified the basic requirements which will be expected from each of the sites in terms of green infrastructure provision. These have been included within the site specific policies set out within the Plan.
- 3.4 It is not possible to quantify exactly how much space will be required for green infrastructure because the exact provision will be negotiated on a site-by-site basis in accordance with the principles set out within the Green Infrastructure Strategy and the policies within the Adopted Core Strategy and Site Allocations and Policies Plan.

#### 4. Is Policy SAL.UP13 positively prepared and sound?

4.1 The District Council considers policy SAL.UP13 to be positively prepared and sound. The policy is centred around the impact of proposals on landscape character and biodiversity. Both are issues which are identified within the NPPF. The impact of equestrian developments on biodiversity is an important issue that has been identified for the District through the Sustainability Appraisal scoping process.

- 4.2 Landscape Character Supplementary Guidance (ED21) has been produced by Worcestershire County Council following the completion of a Landscape Character Assessment (EB053). This guidance will provide the background for determining the impact of proposals on the character of the landscape.
- 4.3 The Worcestershire Biodiversity Action Plan (EB054), together with advice from the District Council's Countryside Officer, will be used as a basis for determining the suitability of applications on biodiversity grounds.