



## **Wyre Forest District**

### **Site Allocations and Policies Plan**

#### **Examination**

#### **Statement of Common Ground 4 (SOCG4)**

#### **Homes and Communities Agency (HCA)**

14<sup>th</sup> January

**WYRE FOREST DISTRICT SITE ALLOCATIONS & POLICIES  
EXAMINATION IN PUBLIC  
STATEMENT OF COMMON GROUND – HOMES AND COMMUNITIES  
AGENCY**

This “Statement of Common of Ground” has been developed in response to representations received from AMEC (on behalf of the Homes and Communities Agency), on the Pre-Submission Publication version of the Site Allocations & Policies in relation to the former Lea Castle Hospital site at Cookley, Kidderminster.

The relevant representations are summarised in the Regulation 22 (c)(v) Statement at Appendix B and specifically are set out below:

- SALPP207
- SALPP214
- SALPP211
- SALPP208

Officers from Wyre Forest District Council and representatives from AMEC and the Homes and Communities Agency held a meeting on 15<sup>th</sup> November to discuss the representations listed above.

At this meeting those parties present discussed common ground in relation to a number of issues and matters raised by the representations. The table attached at Appendix 1 outlines those areas where agreement has been reached on common ground. It also outlines those areas where it is considered that further discussion and clarification is required during the relevant hearing sessions at examination.

**Appendix 1 – Table of agreement and resulting proposed amendments to the Site Allocations & Policies Plan.**

APPENDIX 1 – WYRE FOREST DISTRICT SITE ALLOCATIONS AND POLICIES EXAMINATION IN PUBLIC STATEMENT OF COMMON GROUND – HOMES AND COMMUNITIES AGENCY

Homes and Communities Agency Representation	Paragraph / Policy	Director of Economic Prosperity and Place Response	Resulting Minor Amendment to the Site Allocations and Policies?	Response from Homes and Communities Agency	Common Ground Established?
<p><b><u>SALPP207</u></b></p> <p>Together these public sector bodies, the land owners of the former Lea Castle Hospital site, are keen to see a planning policy framework established that is suitably flexible to maximise alternative future uses which are able to support wider housing choice, job creation and necessary infrastructure provision and ensure positive change through delivery of the site’s comprehensive redevelopment.</p>		<p>Noted and agreed. A comprehensive approach based on a mix of uses would be welcomed to deliver the Lea Castle site within the plan period and to ensure that it contributes towards the overall regeneration of the District and delivers sustainable development which is based on a mix of uses.</p>	<p>N/A</p>	<p>N/A</p>	<p>Common ground has been established</p>
<p><b><u>SALPP214</u></b></p> <p>The District Council has acknowledged concerns about the viability of employment on this site; it also gave a commitment to explore other options through the Site Allocations process and to actively work with the site owners to consider the future redevelopment of this damaged and derelict site. The landowners have since met with the Council on several occasions to consider future uses for the</p>		<p>The concerns with regard to the site’s viability issues are noted and understood. However, having met with the landowners prior to the submission of the Site Allocations &amp; Policies Plan, it was</p>	<p><b>SALMOD64</b> <b>Policy SAL.PDS1</b> <b>Previously Developed Sites in the Green Belt</b> <b>Lea Castle Hospital</b></p>	<p>The HCA is satisfied that the proposed amendments to Policy SALPDS1 – Lea Castle, provide sufficient flexibility to help ensure that the opportunity</p>	<p>Common ground has been established</p>

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<p>site; they are therefore disappointed that the Council has not made any further changes to the policies and the specific inclusion of C3. It is noted that this mix of uses was also supported in separate representations by a wide range of respondents to both consultations on the Site Allocations and on Gypsy/Traveller proposals at Lea Castle.</p> <p>As drafted, the DPD potentially sets up a policy for the site which is undeliverable, leaving considerable uncertainty around the future of this derelict site and the likely negative effect on the local community.</p> <p>The PDS boundary in the SALDPD (Figure 4) does not accurately correspond to the changes in landownership and does not accurately reflect the extent of developed land remaining on the site. To ensure that comprehensive redevelopment proposals for the site can be considered in the future it is requested that the boundary is revised as shown.</p> <p>Identify that guidance in the NPPF requires Councils to respond positively to improve derelict land in areas designated as Green Belt and includes policy</p>		<p>agreed that viability evidence would be provided to the Council. Unfortunately, due to circumstances beyond the Council's control, suitable evidence was not available in time to inform a change in policy at the Pre-Submission Publication stage.</p> <p>The District Council welcomes the HCA's recent commission for the preparation of a detailed viability assessment to look at redevelopment options for the site. The Council supports the sustainable redevelopment of the Lea Castle Site within the plan period and</p>	<p><b>Site</b></p> <p>Within the Previously Developed Land (PDL) boundary of the former Lea Castle Hospital, the following development is acceptable in principle:</p> <ul style="list-style-type: none"> <li>• C3 (Dwelling Houses)*</li> <li>• C2 (Residential Institutions)</li> <li>• B1 (Business); and,</li> <li>• health and sport facilities</li> </ul>	<p>exists for this important brownfield site to be brought back into use during the plan period.</p>	

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<p>changes intended to allow proposals on previously developed sites to be considered more flexibly. The recent Ministerial Statement specifically encourages Councils to make the best use of previously developed land in the Green Belt.</p> <p>The HCA, Department of Health and the Coventry and Warwickshire Partnership Trust have jointly commissioned Drivers Jonas Deloitte to prepare a detailed viability assessment looking at different redevelopment options including B1 and C2, plus C3. It is the intention to present the findings of the viability work to the Council, findings which they believe will support the case for a revision to Policy SAL.GPB1. It is hoped that this will form the basis for further discussion with the District Council to progress a Statement of Common Ground in order to achieve a deliverable policy for the site.</p>		<p>recognises that the specific nature of the site means that issues of viability and deliverability will be of particular concern. The initial results of the viability assessment and market testing demonstrate that without an element of C3 enabling development then the delivery of the site during the plan period is highly unlikely. The Council acknowledges that the evidence has now been made available to support this.</p> <p>The Development Options for uses will be of critical importance for the Council's</p>	<p>Planning permission for the development/ redevelopment of any part of the site will not be granted in isolation unless the application is accompanied by a comprehensive masterplan for the whole site, which has been prepared in consultation with the local community and the District Council.</p> <p><b>Development Principles for the Site</b></p> <p>As a minimum, the District Council will require development proposals to:</p> <ul style="list-style-type: none"> <li>• demonstrate</li> </ul>		

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		<p>consideration of a planning application for the site in the future. The Council does not consider that a large, wholly residential development would be in line with the overarching development strategy for the District. Furthermore, it is mindful of the parameters set out under the NPPF (Paragraph 89, bullet point 6). The Core Strategy focuses residential development on regenerating brownfield sites within Kidderminster and Stourport town centres. Consequently, large scale, high density residential development</p>	<p>no greater visual impact on the openness of the Green Belt than existing development</p> <ul style="list-style-type: none"> <li>• be focused on the previously developed parts of the site</li> <li>• supplement and enhance existing strong landscape framework surrounding the site to improve ecological and</li> </ul>		

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		<p>at the Lea Castle site could jeopardise the delivery of some of the District’s key regeneration sites within the town centres. For these significant reasons, the District Council is unable to support large scale residential development at the Lea Castle site during the Core Strategy’s Plan Period to 2026.</p> <p>The report “Viability Testing Local Plans” (June 2012) recognises that there are significant challenges for planning authorities seeking to make plan policies that both provide for acceptable development and avoid</p>	<p>landscape value</p> <ul style="list-style-type: none"> <li>• retain Talbotshill Coppice</li> <li>• retain existing sport pitches</li> <li>• investigate opportunities for providing safe, attractive and convenient pedestrian and cycle links between the site, Cookley and Kidderminster to ensure</li> </ul>		

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		<p>placing unrealistic pressures on the cost and deliverability of development. These challenges are exacerbated when market conditions reduce the scope for delivering plan policies through lack of development value.</p> <p>Within the context of the viability evidence provided and the NPPF, which encourages the effective use of brownfield land, the Council considers that an element of flexibility to allow for enabling C3 uses should be incorporated into Policy SAL.PDS1. The Policy will focus on the existing previously</p>	<p>that local facilities are accessible by alternatives to the car</p> <ul style="list-style-type: none"> <li>• make a financial contribution to the provision of affordable housing off-site in accordance with the adopted Core Strategy Policy CP04.</li> </ul> <p>*Any application for C3 (Dwelling Houses) must be accompanied by a viability assessment that supports the</p>		



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		developed area footprint within the site. However, the exact details of the developable area and the development mix will be required as part of a comprehensive master plan for the site and this will be set out as a policy requirement.	case for the proposed mix, tenure and overall quantum/ density of housing on site.		
<p><b><u>SALPP211</u></b></p> <p>The site is located just beyond the north-eastern fringe of Kidderminster and is bounded by the A449 (Wolverhampton Road) to the north and the A449 (Kidderminster Road) to the west, by the A451 (Stourbridge Road) to the south east, the B4189 (Park End Road/Wolverley Road) to the south, and Axborough Lane to the north east. The site can be accessed off Park End Road, Wolverhampton Road and Axborough Lane via a series of smaller roads which lead through the site.</p> <p>The central area of the site currently comprises a mixed cluster of one and two storey derelict</p>		<p>The detailed information on the characteristics of the site is welcomed for clarification purposes and it is considered that it would be helpful to incorporate some of this into the reasoned justification for the policy.</p> <p>The comments relating</p>	<p><b>SALMOD64</b></p> <p>Amend the reasoned justification at paragraph 18.6 for the Lea Castle Hospital Site to read as follows:</p> <ul style="list-style-type: none"> <li>- Area 105ha (approx)</li> </ul> <p>18.6 The former Lea Castle Hospital Site</p>	<p>The proposed amendments to the reasoned justification in support of Policy SALDPD SALPDS1 – Lea Castle, are considered helpful and better reflect the site’s background, existing site conditions and</p>	<p>Common ground has been established</p>

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<p>prefabricated buildings dated principally from the 1950s and previously used as a hospital for people with learning difficulties which has since closed. These buildings, together with other former hospital buildings located in the north west corner of the site, have a total estimated footprint of approximately 25,000 sq.m and a gross floor area of around 30,000 sq.m. There is also an extensive network of underground ducts serving the buildings. Asbestos is also present in the ducts and buildings.</p> <p>A sports pitch and club house is located immediately to the south of the main hospital site. The remainder of the undeveloped part of the site comprises a significant area of farmland.</p> <p>Land beyond the PDS boundary is mainly under agricultural use apart from the former nurses' accommodation located adjacent to the site's north west boundary which is now in use as private residential accommodation. Approximately 200 metres in the same direction lies the village of Cookley.</p> <p>The SALDPD includes a map setting out details of the proposed Previously Developed Site (PDS)</p>		<p>to a revised boundary area of the Previously Developed Site are noted and Officer's have considered them in detail against new policy as set out in the National Planning Policy Framework (NPPF).</p> <p>The NPPF identifies that the essential characteristics of the Green Belts are their openness and their permanence. The construction of new buildings is inappropriate development in the Green Belt however an exception to this is the limited infilling or the partial or complete redevelopment of previously developed</p>	<p>lies <u>just beyond the north eastern fringe of Kidderminster</u> between the A449 Wolverhampton Road and the A451 Stourbridge Road. It contains a variety of buildings set out in an attractive landscape, well screened from the surrounding agricultural land by extensive belts of trees. <u>The central area of the site comprises a mixed cluster of one and two storey derelict prefabricated buildings dating principally from the 1950s and previously used as a hospital for people with learning</u></p>	<p>development context.</p> <p>The HCA agrees with the proposed amendment to the site boundary.</p>	

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<p>boundary for Lea Castle, a boundary which is smaller than the one currently included in the Adopted Local Plan. Whilst some parts of the site have been sold by the landowners since the Local Plan was adopted, including former nurses' accommodation located off The Crescent for example, the PDS boundary in the SALDPD does not accurately correspond to such changes in landownership and does not accurately reflect the extent of developed land remaining on the site. For this reason, and to ensure that comprehensive redevelopment proposals for the site can be considered in the future, it is requested that the PDS boundary is revised as shown in Figure 5.</p>		<p>sites (brownfield land) whether redundant or in continuing use (excluding temporary buildings) which would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development.</p> <p>The District Council considers that in order to protect the Green Belt areas within the District in accordance with the NPPF, Policy SAL.PDS1 must ensure that any development proposals for the Lea Castle site must not have a greater impact on the openness of the Green Belt than the</p>	<p><u>difficulties, which has since closed. These buildings, together with other former hospital buildings located in the north-west corner of the site, have a total estimated footprint of approximately 25,000 sq.m and a gross floor area of around 30,000sq.m. There is also an extensive network of underground ducts serving the buildings.</u></p> <p><u>A sports pitch and club house is located immediately to the south of the main hospital site. The remainder of the undeveloped part of</u></p>		

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		<p>existing development. For this reason, it is proposed that the Policy should include some specific principles for new development which reiterate the requirement to limit the impact on the openness of the Green Belt. If these safeguards are clearly set out in the Policy including the need to protect the undeveloped pavilion and playing field and Talbotshill Coppice to the north west of the site,</p> <p>then the District Council accepts that the Proposed Revised PDS Boundary more accurately reflects the recent changes in land ownership and the</p>	<p><u>the site comprises a significant area of farmland.</u></p> <p><u>Land beyond the Previously Developed Site boundary is mainly under agricultural use apart from the former nurses' accommodation located adjacent to the site's north west boundary which is now in use as private residential accommodation.</u></p> <p>Amend the last sentence of Paragraph 18.10 to read as follows:</p> <p>"It is considered, therefore that there</p>		

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		<p>extent of developed land remaining on the site.</p>	<p>is general public support for a proactive policy to be implemented that helps to deliver a <u>viable development based on a potential mix of uses</u> whilst being mindful of the unique landscape and Green Belt setting that the site has.”</p> <p>Amend bullet points listed under Paragraph 18.11 to include C3 Dwelling Houses, to read as follows:</p> <ul style="list-style-type: none"> <li>- B1 (Business)</li> <li>- C2 (Residential Institutions)</li> <li>- <u>C3 (Dwelling Houses)</u></li> </ul>		

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			<ul style="list-style-type: none"> <li>- Health Uses</li> <li>- Sport and Recreation Facilities</li> </ul> <p>Amend the Previously Developed Site Boundary included at Page 165 adjacent to Paragraphs 18.7 to reflect the wider area for inclusion within the boundary that was submitted by the HCA.</p>		
<p><b><u>SALPP208</u></b></p> <p>Welcome the inclusion of Lea Castle as a Previously Developed Site. However, the range of uses set out in Policy SAL.PDS1 are objected to as it is considered they render the policy undeliverable.</p> <p>No interest has been shown in the development of the site for employment purposes. Market advice</p>		<p>Noted. Please refer to the response as set out above.</p>	<p>Please refer to the proposed amendments as set out above.</p>	<p>N/A</p>	<p>N/A</p>

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has confirmed not only a lack of interest in development of the site for major commercial development but also highlighted that without some reference to C3 (residential) within the mix of uses considered appropriate, there is little prospect of delivering development on the site					
<p><b><u>SALPP207</u></b></p> <p>Together these public sector bodies, the land owners of the former Lea Castle Hospital site, are keen to see a planning policy framework established that is suitably flexible to maximise alternative future uses which are able to support wider housing choice, job creation and necessary infrastructure provision and ensure positive change through delivery of the site’s comprehensive redevelopment.</p>		Noted and agreed. A comprehensive approach based on a mix of uses would be welcomed to deliver the Lea Castle site within the plan period and to ensure that it contributes towards the overall regeneration of the District and delivers sustainable development which is based on a mix of uses.	N/A	N/A	Common ground has been established