# SITES SELECTION PAPER AUGUST 2019



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#### 1 Introduction

- 1.1 This paper aims to explain the process undertaken by Wyre Forest District Council to identify the sites to take forward into the Wyre Forest Local Plan Pre-Submission document. It aims to demonstrate that the approach adopted is sound and will enable the Council to meet its development requirements for the plan period 2016-36.
- 1.2 The Local Plan must seek to deliver sustainable development and be based on a sound evidence base.
- 1.3 The main aim of this paper is to bring together in a single document key conclusions arising from the following evidence base documents:
  - a) Housing and Economic Land Availability Assessment
  - b) Green Belt Review Stage 1 and 2
  - c) Sustainability Appraisal
  - d) Strategic Flood Risk Assessment / Water Cycle Strategy
  - e) Heritage Evidence Base
  - f) Ecological site appraisals and Green Infrastructure Concept Statements
  - g) Transport Evidence Base
- 1.4 This sites selection paper balances the key findings from the above studies and considers whether sites should be considered for allocation in the emerging Local Plan. In doing so, consideration has also been given to any cumulative effects or common circumstances which may affect whether or not a site, or group of sites, should go forward for consideration for allocation. Policy implications of allocation have also been taken into consideration.
- 1.5 This Background Paper will outline the discussions which have taken place as to which sites are most suitable for allocation in the emerging Local Plan. It aims to tell the story of how the initial site list was filtered down to the final list of sites selected for the pre-submission Local Plan.
- 1.6 The Pre-submission Local Plan needs to allocate enough land for both housing and employment to meet the needs of Wyre Forest District from 2016-36.

#### 2 Housing Requirements

- 2.1 An Objectively Assessed Housing Needs Study was initially undertaken by Amion and published in 2016. This established a requirement of 254 dwellings per annum for the plan period 2016-2032. Following the Brexit vote, and the release of updated household projection figures, the analysis was undertaken a second time and republished in May 2017. This gave an OAHN of 300 dwellings per annum which equated to 5,400 dwellings over the slightly amended plan period of 2016-34.
- 2.2 The plan period has now been extended to 2036 (20 years) and a refreshed Housing Needs Study was undertaken by Arc4 following the publication of the household projections by the Government in late September 2018. This study uses the Government's new standardised methodology and supersedes all previous studies. Using the 2016-based household projections, it shows a minimum housing need of 276 dwellings per year. In addition to this, an additional 487 care home/nursing home bedspaces will be required (C2 uses). It should be noted that extra-care apartments, being fully self-contained dwellings, will form part of the housing supply.
- 2.3 The updated NPPF and PPG now requires housing needs assessments to use the 2014-based household projections to set the baseline for the standard method calculation. In most cases this would give rise to a higher requirement figure but this recalculation would give a revised figure for Wyre Forest of 248 dwellings per annum. The Wyre Forest Local Plan is using the 2016-based data, so this departure from using the standardised methodology will need to be fully justified. In WFDC's situation, our housing need is actually higher using the 2016 data than the 2014 data so this helps to meet the Government's aspirations of delivering more housing.
- 2.4 The justification for using the higher housing number in the Local Plan is as follows:
  - Evidence from the Housing Needs Study (2018) suggests that there is a significant need for affordable housing within the District with 158 dwellings needed each year of the Plan period. It is however, not realistic to expect this amount of affordable housing to be delivered. Since April 2010, 777 affordable dwellings have been delivered an average of 86 a year. The majority of these have been provided by Wyre Forest Community Housing on 100% affordable sites. A target of 90 affordable homes per year has been set for the Local Plan. This is seen as realistic. Viability issues have reduced the amount of affordable housing being brought forward on large brownfield sites such as British Sugar (12%) and Georgian Carpets (24%). According to the Housing Needs Study, 22% of households cannot afford even social rent levels and therefore it is paramount that a higher housing figure is used in the plan to encourage social rent housing on private developments via S106 agreements.
  - Another argument for using a higher housing figure is to encourage economic growth in the District. The North Worcestershire Economic Development and

Regeneration team have been successful in bringing new firms into the district to replace jobs lost with the decline of the carpet industry. In order to attract high quality well-paid jobs into the District, we not only need to provide land for employment development but a wide range of housing on attractive sites at a range of locations. This will encourage people to relocate to the District, not just to live but also to work.

- The Council is now proposing an allocation of approximately 6,365 dwellings over a 20 year period (2016-36). The clear and firm legal advice is that the Council allocates around 15% more than required, to allow for sites not coming forward. Using the 276 figure, the Local Plan would be over allocating by 15%.
- A final reason for using a higher housing figure is to help with the overall national housing supply situation. An annual delivery of 276 dwellings is considered feasible. Proposals for a number of large brownfield allocations are now well-advanced and these are expected to have developers on site prior to the Local Plan examination where potential Green Belt releases will be debated.
- 2.5 Council Tax Base dwelling stock records (October 2017) show a housing stock of 46,640 dwellings in Wyre Forest. Current housing stock is split as follows between the different housing types:

Table 1 Analysis of Housing Stock at October 2017

Housing Type	Number of units (Oct.2017)	% of total stock
Bungalow	5,100	11
Flat / maisonette	5,950	13
Terraced house	9,810	21
Semi-detached house	13,710	29
Detached house	10,400	22
Annex / caravan	1,670	4
Total dwelling stock	46,640	100

- 2.6 In terms of Council Tax banding, around 75% of dwellings fall within bands A to C, with only 6.5% in bands F to H reflecting the lower house prices in the District compared with neighbouring areas. Figures from the 2018 Council Tax base show that the number of dwellings has increased by 265 to 46,905 dwellings.
- 2.7 On the basis that the whole district is affected by demographic and economic change, the following table illustrates, for indicative purposes only, how much growth each part of the district would need to accommodate if the proposed housing allocation of 6365 was distributed on a proportionate basis.

Table 2 Proportionate distribution of Housing Allocation across Wyre Forest District

Location	Housing stock October 2017	Potential allocation
Kidderminster East	13800	1883
Kidderminster West	12040	1642
Stourport-on-Severn	9760	1331
Bewdley (+ Upper Arley)	5710	779
Rock Parish	1150	157
Wolverley	1080	147
Cookley	1180	161
Blakedown	1230	168
Chaddesley Corbett	710	97
District wide	46640	6365

- 2.8 This is simply a starting point and not necessarily the distribution of growth that should be taken forward. There are a number of constraints that would limit growth at certain locations. For example, the West Midlands Green Belt extends across the eastern part of the district as far west as the River Severn and plays a very important role in stopping the 3 main towns of Kidderminster, Stourport-on-Severn and Bewdley from merging and retaining their individual characteristics. Land to the west of the River Severn is much more rural with dispersed settlements and access to services and employment is limited by few river crossing points.
- 2.9 The Plan needs to respond to different approaches for achieving sustainable development in different areas. The planning system must perform certain key roles, economic, social and environmental. The pursuit of sustainable development includes making it easier for jobs to be created in towns and villages, moving from a net loss of biodiversity to achieving net gains in the future, replacing poor design with better design, improving the conditions in which people live, work, travel and take leisure; and widening the choice of high quality homes. These roles must not be taken in isolation because they are mutually dependent.
- 2.10 It is highly unlikely, given the availability of suitable sites in different locations, the different characteristics of parts of the district and the capacity of infrastructure to accommodate growth in certain settlements that a mathematical proportionate split will be achievable or represent the most appropriate distribution pattern. However, it is helpful to understand what level of growth could reasonably be associated with each part of the district and to then explore to what extent such growth could be addressed.

#### 3 Housing Completions to Date and Remaining Requirement

3.1 The plan period for the emerging Local Plan started in April 2016 so any housing completions from that date and outstanding planning approvals need to be taken into account. Around 19% of the requirement has already been accounted for.

Table 3 Housing completions and outstanding permissions at 1 April 2019

Location	Completions April 2016 – end August 2018	Outstanding permissions at September 2018	Sub-total	Shortfall against Proposed Housing Allocation
Kidderminster East	92	300 (includes 91 dwellings adjacent urban area)	392	1491
Kidderminster West	310 (100 extracare flats)	72	382	1260
Stourport-on- Severn	104 (60 extra- care flats)	132	236	1095
Bewdley (& Trimpley /Arley)	17	27	44	735
Rock	10	38	48	109
Wolverley	11	5	16	131
Cookley	4	18	22	139
Blakedown area	5	18	23	145
Chaddesley Corbett	32	16	48	51
District wide	585	626	1211	5154

All figures are net of demolitions – Bewdley has seen 27 demolitions since April 2016

3.2 The majority of completions / outstanding approvals are on brownfield (previously developed) sites as the current Local Plan has a brownfield first strategy. Initial analysis of available brownfield sites has shown that a change in policy will be required to meet the proposed Housing Need as there are not enough deliverable brownfield sites available. The District to the east of the River Severn is highly constrained by Green Belt. Putting large amounts of development to the west of the River Severn would not be sustainable as there are few crossing points and traffic would have to go through highly congested town centres to reach the main areas of employment in Kidderminster and further afield in the West Midlands Conurbation. For this reason, a Green Belt Review has been undertaken as part of the background evidence base for the Local Plan Review.

### 4 Call for Sites and the Housing and Economic Land Availability Assessment

- 4.1 An initial 'Call for Sites' was undertaken during autumn 2014. This resulted in 75 sites being put forward by landowners for consideration for future development. Further sites were then submitted during 2015. Officers also undertook a comprehensive desktop review to identify any other potential sites which could help to meet future development needs. This included an analysis of the following types of site:
  - existing allocations without planning permission,
  - existing permissions which are not fully implemented,
  - planning applications which have been refused or withdrawn
  - local authority owned land
  - potentially surplus public sector land
  - Vacant / derelict land and buildings
  - Under-used sites such as garage blocks
  - Rural sites
  - Large-scale potential redevelopment areas
  - Sites in /adjoining rural settlements and rural exceptions sites
  - Potential urban extension sites around the 3 towns
- 4.2 All of these sites were outlined to Local Plan Review Panel members in March 2015 before being considered by an independent panel of experts drawn from local estate agents, planning agents and architects. This panel met towards the end of 2015 once officers had completed a detailed analysis of all the sites. The sites are detailed in the Housing and Economic Land Availability Assessment report (HELAA). The HELAA includes the following:
  - A list of sites, cross-referenced to maps showing locations and boundaries.
  - Assessment of the deliverability/developability of each identified site (in terms
    of its suitability, availability and achievability) to determine when an identified
    site is realistically expected to be developed.
  - Potential quantity of development that could be delivered on each identified site or within each identified broad location or on windfall sites.
  - Constraints on the delivery of identified sites.
  - Recommendations on how these constraints could be overcome
- 4.3 The HELAA was updated following the Preferred Options consultation in 2017 when another 'Call for Sites' was made. A further complete refresh of the HELAA was undertaken in 2019 to include all the site assessments in one single document.

#### 5 Local Plan Review – Issues and Options Consultation

- 5.1 In September 2015, the District Council undertook an Issues and Options Consultation on the Local Plan Review. This outlined 7 potential growth options.
- a) Option 1 Brownfield regeneration focussed on Kidderminster and Stourporton-Severn
- b) Option 2 Brownfield regeneration focussed on main towns plus expansion of Kidderminster to NE via sustainable urban extension
- c) Option 3 Brownfield regeneration focussed on main towns plus expansion of Kidderminster to SE via sustainable urban extension
- d) Option 4 Brownfield regeneration focus for Stourport-on-Severn
- e) Option 5 Allocate some development to Bewdley through an amendment to the town's settlement boundary to accommodate new development
- f) Option 6 Allocate more new development to the villages and settlements within the Rural East
- g) Option 7 Allocate more new development to the villages and settlements within the Rural West
- 5.2 There was widespread support for continuing with a brownfield-led strategy although concerns were raised about the viability of several of the remaining allocated sites that had not come forward for redevelopment. There was also general overall support for a sustainable urban extension based around Lea Castle (option 2) but local opposition to Option 3 especially from Spennells' residents. In Stourport, there was continuing widespread support for brownfield regeneration but many questioned whether Greenfield development was needed. In Bewdley there was acknowledgement that development was required to meet local needs which may entail a redrawing of the settlement boundary. In the eastern villages, it was acknowledged that any development should be proportional and in the more remote western villages, it was agreed that limited development to meet local needs would be required.

#### 6 Local Plan Review Evidence Base

- 6.1 Following on from the Issues and Options Consultation, an extensive evidence base was commissioned including a Green Belt Review, Strategic Flood Risk Assessment and Water Cycle Study, together with an Infrastructure Delivery Plan and Viability Study. A Sustainability Appraisal looked at all the sites in the HELAA, including those that had been discounted in the initial stages.
- 6.2 Further studies were undertaken in 2018 including ecological appraisals on a number of sites (suggested by the Green Infrastructure Partnership as requiring further assessment) and a Heritage Impact Assessment together with Transport Modelling. In 2019, the Transport Modelling was re-run as there had been a number of inaccuracies in the earlier report. The conclusions from these various studies are outlined in Appendix 1 to this report. An Open Space, Built Facilities and Playing Pitch Strategy report was also commissioned together with an Employment Land Review and Retail Needs Assessment. These studies helped to calculate the various requirements which are covered in the Local Plan.
- 6.3 The Employment Land Review (2018) report appraised a range of employment land projections for Wyre Forest District using a variety of methodologies. The report concludes that the employment land requirement for Wyre Forest District should be 29ha of land for the 20 year plan period 2016-36. The Pre-Submission Local Plan thus looks to allocate enough land to cater for this requirement.

#### 7 Evolving Development Strategy

- 7.1 Housing development under both the Adopted Core Strategy (2010) and the previously Adopted Local Plan (2004) were based on 200 dwellings per annum (dpa). The requirement is now much higher at around 276 dpa which over a 20 year plan period would equate to 5,520 dwellings. It is advisable to plan an over allocation of at least 15%, meaning a minimum of an additional 830 dwellings should be added to the site capacity requirement. C2 dwellings (nursing and care home bedspaces) would be in addition to this requirement and the Housing Needs Study (2018) shows that 487 will be required over the plan period. It should be noted that extra-care apartments are also often classed as C2 use, but in Wyre Forest District these will be included as part of the housing supply and classed as C3 as long as they are fully self-contained apartments.
- 7.2 As a result of this uplift in the housing requirement, it is no longer possible to plan for all our housing needs on brownfield sites as initial analysis of deliverable sites has shown that just under half the requirement can be catered for on such

sites. Many of these sites have been allocated for a number of years and their development viability can often be marginal once decontamination and site clearance costs are taken into consideration. However, as town centre sites, they do score well on sustainability grounds with good access to transport, employment and services.

- 7.3 In order to make up the shortfall, Greenfield release will be required. Outside of the urban areas and larger inset villages, all land east of the River Severn is in the Green Belt. This part of the District has good transport links to the conurbation and onto the motorway network. This easy access to well-paid employment in the conurbation makes this side of the District very attractive to live in and more sustainable to develop. To the west of the River Severn, villages are smaller with few services and access is constrained by a limited number of river crossings with one crossing at Stourport and two at Bewdley. Two of these crossing points are in heavily congested town centres.
- 7.4 Officers from across the District Council met together in early 2016 following on from the Issues and Options consultation in autumn 2015 to discuss a way forward. Key points raised around each of the options were as follows:

#### Option 1 – brownfield regeneration

7.5 It was agreed that the capacity from brownfield sites would not be sufficient to meet the housing need identified in the OAHN Study (Amion). Officers recognised that brownfield regeneration will continue to make an important contribution to the overall development strategy. Sites would need to be viability tested which would inevitably reduce capacity still further. It was therefore agreed that Greenfield sites would be needed in the new Plan period and potentially Green Belt release would be required. It would be necessary to undertake a Green Belt Boundary Review to inform the new plan and location of future housing and employment sites. There were lengthy discussions about the large previously developed site at Lea Castle Hospital and it was agreed that a higher volume of housing than currently proposed (600 dwellings) would be required to make the site sustainable.

#### Option 2 – sustainable urban extension (SUE) to NE Kidderminster

7.6 It was generally accepted that the Lea Castle Hospital site on its own would not have sufficient critical mass for the creation of a stand alone community and therefore the additional capacity of a SUE would help to provide the supporting infrastructure and services so that its residents did not rely on facilities in Kidderminster Town Centre or Cookley village. It may be better to allocate some sites as future Areas of Development Restraint (ADRs) rather than bringing too much development forward in this plan period in this part of the District. Major concerns were voiced about the potential impacts on the historical settlement identity of Hurcott village and the surrounding pools system and nearby Sites of Special Scientific Interest (SSSIs). The reservoir and dam at Hurcott was expected to be

upgraded to high risk in the near future which could limit development in the surrounding area.

#### Option 3 – SUE to SE Kidderminster

7.7 There was much concern that the scale of development proposed under this option was too large but the decision was taken to not exclude sites at this stage. There was much discussion about the potential to deliver infrastructure, in particular a link road through the site from the A448 (Bromsgrove Road) to the A456 (Birmingham Road). If possible, a further link through to the A449 Worcester Road would be preferable. This would allow sites to the rear of Spennells to come forward. Concern was expressed as to when infrastructure would be delivered in relation to the delivery of housing. Officers considered that some sites could be allocated and perhaps others could be designated as Areas of Development Restraint to be released for housing in future Local Plan Reviews. It was considered that the northern sites nearest the A456 would be key areas for infrastructure provision with the sites south of Spennells best excluded at this time. The key conclusion was that options 2 and 3 should be considered in tandem and not separately.

#### **Option 4 – Stourport Greenfield development**

7.8 Officers were keen not to over-develop to the south of the River Severn. It was considered that the land at Pearl Lane would be too significant a scale to develop owing to the pressures on the transport network and in particular congestion across the bridge and in the town centre. Access to employment opportunities is also very poor on this side of the river. There would however be potential for development on the Ribbesford Road/Rectory Lane site as it was much smaller in scale. Although the sites around Burlish Crossing are in the Green Belt it was generally felt that these would be more acceptable to the local community and they are more sustainable with easy access to services and employment. It was considered possible to deliver infrastructure improvements at Burlish Crossing which is currently subject to considerable congestion at peak times. Land off the Kingsway could be identified as an ADR for release in a future Plan review.

#### Option 5 – Bewdley Greenfield development

7.9 Officers did not wish to overdevelop the town owing to its historical and topographical constraints. However, it was recognised that the town needs to see some development in this Plan Review. Previous plans had severely limited development in the town. Officers considered that there was potential to develop small pockets of land in the area around St. Anne's Primary School. The impact of noise from the bypass would have to be taken into consideration. Land at Grove Farm was considered to be totally inappropriate owing to landscape and accessibility issues. There was widespread support for the Stourport Road Triangle site and land at Catchem's End as long as the setting of the church was protected. They were both considered to be sustainable sites with good accessibility to services and

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facilities. Land at Grey Green Farm was considered to be a natural extension to the Queensway estate although there were concerns over accessibility and the scale of development proposed.

#### Option 6 – Further development to Eastern villages

7.10 There was a great deal of debate over Blakedown which was considered to be very sustainable in terms of access to transport links and local services. However it may not be possible to deliver larger sites in the village and few sites had been submitted by landowners. Officers were keen on the site at Lower Chaddesley as it was near the new school with easy access to village facilities. Officers were generally in support of development at Cookley and in Fairfield. The ADR sites were considered to be suitable and Lawnswood would allow planning gain in allowing improved footpath links to the village centre from existing residential development.

#### Option 7 – Further development in Western villages

- 7.11 There was an understanding amongst officers that this part of the District was more remote in terms of service provision despite not being washed over by the Green Belt. Officers supported proposals at Upper Arley and in Far Forest (limited numbers) as these developments would safeguard the village schools and were well placed to access local services. The site in Rock village was not considered to be sustainable as there were no local services other than a village hall.
- 7.12 It was decided that a combination of options was probably the best route forward with infrastructure requirements, especially schools and highways being critical to the final strategy. During 2016, a number of meetings were held and potential sites for allocation were discussed.

#### **8 Preferred Options Consultation**

8.1 Towards the end of 2016, it was decided that the best option would be to consult on 2 distinct development options, with Option A being centred on an urban extension to the east of Kidderminster and Option B being a more dispersed development strategy. A number of 'core' sites were common to both options. There were 24 core sites in Kidderminster including 10 for employment plus an optional site for residential/employment use. The proposed Kidderminster SUE included 10 core sites (2 for employment), with optional sites to the south of Spennells and at Lea Castle. In Stourport-on-Severn there were 11 core sites with an additional 4 under option B. At Bewdley 3 core sites were proposed with an additional site under option B. In the rural west 6 sites were proposed for allocation. There were no proposed

allocations in the eastern villages as it was considered that the SUE for Kidderminster would also absorb any requirement here. The 'core' sites were simply common to both development options. The public would be able to comment on any of the sites. The 'core' sites were not a 'done deal'.

- 8.2 A number of evidence base studies have been undertaken and potential sites analysed. Many of these studies have shown potential issues with some of the sites. Brownfield sites frequently have problems with flooding, both fluvial and from surface water runoff. There are also viability issues affecting many of the town centre sites. For this reason, many of the existing allocations were not taken forward into the Preferred Options.
- 8.3 The Preferred Options consultation took place in June-August 2017 over an eight week period. The Council proposed an allocation of 6,304 dwellings under Option A and 6,559 dwellings under Option B over an 18 year period (2016-34).
- 8.4 The Preferred Options consultation resulted in over 5,000 responses. The key issue centred around a wish to limit Green Belt release and revisit the potential pool of brownfield sites that could be redeveloped for residential use. A Call for Sites also ran alongside the Preferred Options consultation. This resulted in a number of new sites being put forward by landowners together with some sites which officers had previously discounted as unsuitable. Work was also undertaken in late 2017 to publish a Brownfield Land Register and some of these sites are now being considered for allocation.
- 8.5 Key concerns raised by residents were that brownfield sites should be developed before any Greenfield Green Belt land and issues around traffic congestion and loss of land for recreational access if development goes ahead. It was also felt by many residents that insufficient investigation had been undertaken into all the potential brownfield sites. Loss of high quality agricultural land was also highlighted. An alternative location for a new village at Lea Castle was suggested by several groups of residents. The proposal for an eastern relief road from the A456 Birmingham Road connecting through to the A449 Worcester Road was unpopular with many residents in the area.
- 8.6 As a result of the consultation responses, officers looked at the possibility of allocating a larger area based around the Lea Castle Hospital complex. The surrounding agricultural fields are also in the ownership of Homes England. This would give a large enough settlement to have its own primary school, employment and community facilities. Existing brownfield allocations and sites included on the Brownfield Land Register were also revisited to see if any would be viable and deliverable.

#### 9 Site Discussions following Preferred Options Consultation

- 9.1 Discussions have taken place with statutory consultees including Historic England, Environment Agency, Natural England, Worcestershire Wildlife Trust and officers from Worcestershire County Council. A greater understanding of the various issues affecting the sites which were not picked up from the original pieces of evidence base work has now been gleaned and this has led officers to reassess a number of sites. Ecological assessments were also undertaken on several sites in 2018. Transport modelling was also undertaken on all the potential sites for allocation.
- 9.2 A series of meetings were held between officers from the County Council and the District including planning policy, development management, ecology, landscape, heritage, education and transport. Officers from the North Worcestershire Water Management and the North Worcestershire Economic Development and Regeneration teams were also involved together with Worcestershire Wildlife Trust. These meetings looked at all the potential constraints affecting the sites. The Worcestershire Green Infrastructure Partnership has produced a number of Green Infrastructure Concept Plans following these meetings. These documents now form part of the evidence base.
- 9.3 At these meetings, officers reconsidered all of the sites that had been included in the Preferred Options. A number of sites were removed for mostly ecological and highways reasons. All of the sites which had been submitted through the Preferred Options Call for Sites exercise were also assessed via this cross-departmental officer group. They were also assessed through updates to the evidence base studies. The results of these assessments can be found in Appendix 1 to this paper.
- 9.4 The HELAA document was also revisited in order to reassess sites that had been previously discounted. In December 2017 the first Brownfield Land Register was published and this was also assessed as a potential source for suitable sites for allocation through the Local Plan.

#### 10 Role of the Local Plan Review Panel

10.1 The Local Plan Review Panel is made up of District Councillors together with representatives from the 3 Town Councils. It has met regularly throughout this Local Plan process to discuss key pieces of evidence base as well as details of potential sites. There were 5 meetings in 2016 where members discussed how realistic it was to continue to pursue a brownfield-led strategy with a much higher housing requirement and issues around deliverability and viability of the remaining brownfield

sites. At another meeting, members also discussed the findings of the Housing and Economic Land Availability Assessment, both the desk-top analysis and the conclusions of the independent panel which was appointed to look at all the potential sites. Members agreed with officers that there was not enough brownfield capacity to meet the identified need and for the first time since 1974, Green Belt boundaries would need to be reassessed.

- 10.2 In 2017, the Local Plan Review Panel met a further 4 times. The first 3 meetings discussed the Preferred Options Document and the key challenges facing the District, including how to provide sites for a much greater number of homes than in previous Plans. Viability of development was also an important issue with many of the existing allocations proving difficult to bring forward. The sites going forward into the Preferred Options document took account of an extensive evidence base and Duty to Cooperate meetings with neighbouring authorities, Worcestershire County Council, statutory organisations and key infrastructure providers.
- 10.3 Following the 8 week consultation on the Preferred Options, the panel then considered the initial summary of responses. As well as comments from statutory consultees, a number of petitions were received. There was widespread concern over the release of Green Belt land and the effect this would have on food production and local wildlife. The proposed eastern extension to Kidderminster had also included a proposal for an eastern relief road which was very unpopular with both residents and nature conservation groups. The key point to come out of the consultation was concern that brownfield land should be built out before releasing any Green Belt land. There were also concerns that infrastructure such as roads, schools and doctors' surgeries would not be able to cope with the proposed development. In terms of the proposed Options A and B, there was criticism of both options, and many considered that a combination of the two options would provide better sustainable deliverable growth for the District.
- 10.4 In 2018, the Panel met a further 6 times to discuss firstly the additional sites submitted during the Preferred Options Consultation and then, at subsequent meetings, the suggested sites for allocation in the pre-submission document. Following the Preferred Options Consultation, officers had also revisited available brownfield sites in the HELAA which had not been taken forward at that stage together with any other sites which had been included in the new Brownfield Land Register from December 2017. This was in answer to the criticism that too few brownfield sites had been put forward for allocation at the expense of Green Belt. The Preferred Options Consultation Report was also discussed at length. One of these meetings was specifically to discuss this site selection paper with Members.
- 10.5 Following on from the Pre-Submission Consultation in November / December 2018, the Panel reconvened in July 2019. Key items on the agenda included feedback to the consultation from statutory consultees, transport modelling,

Infrastructure Delivery Plan update and revisions to proposed site allocations as a result of consultation responses.

#### 11 Final Site List

- It is important to assess whether there is enough capacity available on deliverable sites to satisfy the housing requirement during the plan period 2016-36. At Preferred Options, officers were assuming a housing requirement of 300 dpa which over the 20 year plan period would mean finding sites for 6000 plus an additional 900 (15%). Soon after this consultation closed, the Government released details of a proposed standard methodology for assessing housing requirement. For Wyre Forest the suggested figure was 246 dwellings. This meant that we had too large a pool of potential sites to choose from and a detailed analysis of the various evidence base studies was required to determine the best sites to carry forward. In late September 2018, the Government released the household projections and this led to a further increase in the housing need and a figure of 276 dwellings per annum will now be used for the pre-submission plan. In early 2019 the Government announced that local planning authorities should revert back to using the 2014based household projections as a starting point for assessing housing need, Wyre Forest District Council decided to continue using the 2016-based figure as this gave us a higher requirement (see chapter 2 for further information).
- 11.2 The final development strategy builds on the Core Strategy which concentrated development on the large amount of brownfield land in the urban areas. However, with this resource being insufficient to cater for the higher housing need figure, Greenfield land take will be required. It is sensible to release Greenfield land adjacent to the urban areas, especially Kidderminster. Two strategic allocations at Lea Castle and an extension to the east of Kidderminster (between the A456 Birmingham Road and the A448 Bromsgrove Road) are now proposed. These allocations will enable the delivery of planned sustainable developments with accompanying primary school, local services and infrastructure.
- 11.3 Sites in the Spennells area have been removed from the Plan, mainly for ecological reasons. Sites around Hurcott Village have also been removed in order to protect the setting of this historic hamlet and its pool and also for ecological reasons with the two Sites of Special Scientific Interest (SSSI) adjacent to the village. Sites that could potentially have an adverse effect on nearby SSSIs or Local Wildlife Sites in terms of hydrology have been discounted. These include the southern part of BW/4 which lies adjacent to Hurcott Pastures SSSI which is being allocated as a Green Gap and the Settling Ponds (FPH/1) which lies adjacent to Wilden Marshes SSSI. Further development at Captains & The Lodge has also been ruled out as concerns have been raised about the potential adverse impact on the adjacent ancient woodland and pools system. Further details can be found at appendix 1. An

additional small allocation to the north of Kidderminster (WA/KF/3) has been included but a larger allocation on this side of town would not be sustainable and would also encroach into open countryside stretching north towards Trimpley with no firm boundary to the Green Belt. The original site submitted was over 90 hectares in size whereas the proposed allocation is 5.6 hectares and has good access to local services.

- 11.4 In Stourport-on-Severn, the emphasis on large-scale brownfield regeneration continues but with some Greenfield release on the urban edges, both to the south of the River Severn (non-Green Belt) and to the north of the town. Sites around Burlish Crossing have now been discounted owing to highway capacity issues at the junction. Following representations from local residents and Worcestershire Wildlife Trust the decision has been taken to remove the proposed allocation at Yew Tree Walk from the final site list. Further justification for this decision can be found at Appendix 6.
- 11.5 In Bewdley, the site at Highclere to the west of the town has been discounted owing to ecological and hydrological concerns. The rural settlements to the west in Rock Parish have had minor amendments made to their settlement boundaries. This will allow for small developments of up to 6 dwellings to be brought forward.
- 11.6 In the eastern rural settlements, Neighbourhood Plans are expected to bring forward development on a number of existing Areas of Development Restraint. These will now be known as Reserved Housing Sites. A limited number of small sites within rural settlements washed over by Green Belt have also been allocated. This will allow some housing to come forward to meet local needs identified in parish housing needs surveys. At Blakedown there are two sites proposed for station car parking; one also includes a housing allocation. Further justification for the larger allocation can be found at Appendix 6.

#### 12 Conclusions

- 12.1 This paper has outlined how the sites have been filtered out as a result of various pieces of evidence base work including Green Belt Review, Strategic Flood Risk Assessment, heritage impact assessment, landscape character /green infrastructure assessment, ecological assessment, transport evidence, sustainability appraisal and viability assessment.
- 12.2 The proposed sites have been grouped together to reflect the six areas used in the evidence base studies, namely Kidderminster Town, Kidderminster North, Kidderminster East, Stourport-on-Severn, Bewdley and Rural Villages. In Kidderminster the canal is used as the divide between east and west. Availability and deliverability of sites will dictate where sites are proposed for allocation rather than where existing development is. Bewdley, for example, is heavily constrained both

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topographically and historically to the west of the River Severn and the most suitable sites to bring forward mostly lie in the Green Belt to the east of the town. Care needs to be taken to maintain the separation between Bewdley and Kidderminster in this location and for this reason there are no allocations to the western fringe of Kidderminster. Potential sites in Bewdley and Arley would provide just 34% of what would be expected if sites were apportioned based on existing dwelling stock. Stourport-on-Severn, however, meets 72% of its expected growth with 46% being on brownfield sites. Development on some key brownfield sites is expected ahead of the Local Plan adoption, thereby ensuring that many of these sites are regenerated before any Greenfield release. Kidderminster West is also highly constrained by the need to safeguard the strategic gap between Kidderminster and Bewdley and a shortage of large viable brownfield sites. Development on the western edge of town would also be very exposed as the current urban edge of Kidderminster is at a much higher level than the open countryside between the two towns. As Kidderminster West and Bewdley are so constrained, Kidderminster East and the proposed strategic allocations at Lea Castle and the eastern extension will absorb the shortfall. Both of these strategic sites have good transport links and are also within easy reach of railway stations at Blakedown and Kidderminster. As part of the Local Plan, new station parking facilities are also planned at Blakedown Station.

- 12.3 Lea Castle Hospital and the surrounding land is all in the ownership of Homes England. It is now proposed to develop a stand-alone settlement based on this wider area of land complete with a school, employment land and community facilities. This site could provide approximately 1400 dwellings.
- 12.4 The analysis of all the various pieces of evidence has shown that certain parts of the district would not be suitable for further large-scale development. This is especially true of West Kidderminster where further extension of the town out into the Green Belt would cause a narrowing of the gap between the towns and would be very exposed owing to the topography. To the north of Kidderminster, the landscape is also very open and further large-scale development here would encroach into open countryside.
- 12.5 Details of sites considered at Preferred Options but subsequently rejected are included in Appendix 2. Appendix 3 shows additional sites considered for allocation following the Preferred Options consultation but not taken forward into the Pre-Submission document. Appendix 4 lists those sites which were not included at Preferred Options but now form part of the Pre-Submission Local Plan. Appendix 5 shows amendments to sites following the 2018 Pre-Submission consultation. Appendix 6 sets out a justification for these amendments. Appendix 7 summarises the sites proposed for allocation.

### Appendix 2 Housing Sites in Preferred Options not taken forward to Pre-Submission Local Plan

HELAA Ref.	LOCATION	Reason for discounting
Kidderminster Town		
FPH/6	Oasis, Goldthorn Road	Site no longer available for development as lease renewed to safeguard local jobs
FPH/1	Settling Ponds	Adverse impact on adjacent SSSI from noise, lighting, pets, people, hydrological uncertainties
FPH/25	r/o Vale Industrial Estate	Adverse impact on adjacent Local Wildlife Site in terms of ecology
LI/1	Former Ceramaspeed	Building being fully refurbished and extended so redevelopment unlikely
Kidderminster North		
WFR/WC/16	Land south of Wolverley Road/ Park Gate Road	Development here would remove strategic gap between Kidderminster and Lea Castle. Open rural landscape - distinct from suburban edge of Kidderminster
Kidderminster East		
OC/4	Land r/o Baldwin Road	Adverse impact on setting of Hurcott village and adjacent SSSIs. Visual impact of development on elevated site.
WFR/CB/7	Land south of Birmingham Road	Adverse impact on openness of Green Belt and setting of Hodge Hill Farm and Barns
WFR/ST/1	Captains & The Lodge	Ecological constraints – adverse impact on ancient woodland and LWS
WFR/ST/2	Land off Stanklyn Lane	Very sensitive open landscape with wayside settlement along Stanklyn Lane. Protected species
OC/13S	Land at Stone Hill South	Adverse ecological impact on streams and pools system. Known site for corn buntings. Road access would have unacceptable impact on ecology
AS/10	r/o Spennells	Perceived loss of popular field for dog walking and health pursuits. Traffic impact on

		Spennells Estate road systems
Stourport-on-Severn		
AKR/1	Bridge Street Basins	Limited development possible – bring forward as a windfall
AKR/15	Rectory Lane Areley Kings	Adverse landscape impact
LI/2	Wyre Forest Golf Club academy course	Highway constraints at Burlish Crossing
LI/5	Burlish Crossing	Highway constraints at Burlish Crossing
LI/6	Bournewood Nursery	Highway constraints at Burlish Crossing
LI/7	Bradleys Paddock	Highway constraints at Burlish Crossing
MI/17	Stourport Manor	Development would encroach into open rural landscape. Not sustainable location
Bewdley		
BR/BE/6	Land off Highclere Bewdley	Ecological and hydrological constraints
Rural Villages		
BR/RO/1	Land at Clows Top	Unviable to develop – sewerage connection
BR/RO/4/6	Land adj.Tolland Far Forest	Ecological constraints will limit development. Potential to bring forward via Policy 18B as settlement boundary amended to include site
BR/RO/7	Land at New Road Far Forest	Highways issues. Landscape harm
BR/RO/26	Land at Walnut Cottage Bliss Gate	Bring forward via Policy 18B as settlement boundary amended to include site

## Appendix 3 Sites considered following Preferred Options but not taken forward to Pre-Submission Local Plan

HELAA Ref	Location	Source of Supply	Reason for decision
Kidderminster 1	Town		
AS/2/22	Stadium Close/Harriers	LPRPO	Dependant upon stadium relocation going ahead
BHS/21	East Field, Bewdley Hill	LPRPO	Would encroach into strategic gap between towns.
BHS/22	Selba Drive	LPRPO	Important well-used local area of open space with woodland. Protrudes into open landscape of adjoining Green Belt
Kidderminster I	Vorth		
FHN/7	Land north of Marlpool	HELAA	Potential site for release in future plan
FHN/8	Snowdon Close	HELAA	Access issues
WA/BE/13	Land off Habberley Road (r/o Salisbury Drive)	LPRPO	Would extend development into gap between Kidderminster and Bewdley. Sensitive landscape. Highways issues on bend
WA/KF/2	Land off Ferndale Crescent	LPRPO	Would extend development into open countryside. Unacceptable impact on landscape
WA/KF/3 ph2	Land at Low Habberley	LPRPO	Site stretches up towards Trimpley. It would be very difficult to define a firm defensible new Green Belt boundary on this large site
WFR/WC/5	Gaymore Farm Cookley	LPRPO	Adverse impact on the setting of Gaymore Farm and the historic character of dispersed settlement
WFR/WC/13	Land south of Cookley	LPRPO	High risk of coalescence between Kidderminster and Cookley. Very open landscape
WFR/WC/17	Land at Wolverley Road	HELAA	Development would be very visible in open landscape of scattered buildings
WFR/WC/19	Sion Hill playing fields	HELAA	Site would be suitable for development but is not required at this time.
WFR/WC/20	Wolverley Camp, Brown Westhead Park	LPRPO	Adverse impact on woodland and adjacent canal conservation area.  Development would not fit in with dispersed settlement

			pattern
WFR/WC/21	Land off Mill Lane Fairfield	LPRPO	Sensitive site which could take
			limited development. Access
			from private road
WFR/WC/35	Hurcott Kennels	LPRPO	Need to safeguard setting of
			Hurcott village and SSSI. Would
			extend built development on
			south side of A451 beyond
			Hurcott Lane.
WFR/WC/38	Land south of Fairfield Lane	LPRPO	Very open landscape above
			Honeybrook valley
WFR/WC/39	Lea Castle (Strong Farms)	LPRPO	Proposed leisure use likely to
	, , ,		have adverse impact on rural
			parkland character and mature
			woodland
WFR/WC/40			Proposed leisure use and
. , -			marina would have adverse
			impact on adjacent canal
			conservation area and local
			wildlife site
Kidderminster	East		
AS/9	Railway Corner, Stanklyn Ln	LPRPO	Site abuts railway embankment
·	, , ,		which acts as dam holing
			surface water after heavy rain.
			Access would need to be
			through neighbouring flats on
			Stanklyn Lane
WFR/CB/6	Land north of Birmingham	LPRPO	Proposed for employment –
,, -	Road		adverse impact on openness of
			Green Belt at this important
			gateway to Kidderminster.
WFR/ST/3	Land north of Stone Hill	LPRPO	Development here would have
, 5., 5	Zarra rioren or Storie riii.	2 0	adverse impact on rural
			approach to Kidderminster
			where there is limited
			dispersed wayside
			development
WFR/ST/4	Land west of Stanklyn Lane	LPRPO	Highly sensitive rural
vv111/J1/4	Land West of Stanklyn Lane	LINIO	landscape. Woodland setting
			and Stanklyn Lane would be
			adversely affected
WFR/ST/10	Extension to land at Stone	LPRPO	Major development here
VV FN/31/1U	North	LFRFU	would harm the rural
	NOITH		
			landscape and extend built
			development into open
Stournart			countryside
Stourport	Land at Aralay Comman	LDDDO	Advorce landscane impact and
AKR/13	Land at Areley Common	LPRPO	Adverse landscape impact and
NAL/12	Dobbing Decet Marris D.	LIELAA	drainage issues
MI/12	Robbins Depot, Manor Rd	HELAA	Allocated site in commercial
			use. Washed over residential

			zoning so could come forward
			as windfall
MI/35	106 Minster Road	BLR	Owner wishes to retain
			commercial use. Washed over
			residential zoning so could
0			come forward as windfall
Bewdley	The Lakes Dry Mill Lane	LDDDO	Adverse landscane impact
BR/BE/10	The Lakes, Dry Mill Lane Snuff Mill Walk	LPRPO LPRPO	Adverse landscape impact
BR/BE/15	Shull Will Walk	LPRPO	Complex topography, hydrology and ecology issues.
			Listed Building adjacent
WA/BE/4	Northwood Lane	LPRPO	Potential issues with land
VVAy DE/ 4	Northwood Lane	LITTI	stability and amenity of future
			residents
WA/BE/14	Crundalls/Hoarstone Lane	LPRPO	Adverse impact on heritage
1	,		assets, landscape impact,
			potential biodiversity issues
WA/KF/1	Grey Green Lane	HELAA	Limited development could
			potentially be brought forward
			in a future Local Plan if
			required. Access would need to
			be off new housing
			development on Shaw Hedge
D I.V. CH			Road
Rural Villages BR/RO/14	Land at Pound Bank	LPRPO	Remote from settlement and
bK/KU/14	Land at Pound Bank	LPRPO	any facilities
BR/RO/22	Rectory Lane Rock	LPRPO	Potential for limited
51,110,22	Recedity Zame Rock	211110	development under Policy 18B
			so does not require specific
			allocation
BR/RO/27	Oxleys Clows Top	LPRPO	Outside of village,
			unsustainable location, poor
			access
BR/RO/29	Wain House Lye Head	LPRPO	Unsustainable location.
			Remote.
BR/RO/30	Fingerpost Cottage Callow	LPRPO	Adjacent SSSI with poor access
)	Hill	1,0000	near dangerous junction
WA/UA/5	Hill House Farm	LPRPO	Adverse impact on openness of
	Shatterford		Green Belt as limited
			development on this side of lane. Not sustainable location
WFR/CB/3	Station Drive Blakedown	HELAA	Site may be required for
VVIII/CD/3	Station Drive DidNedOWII	112200	additional station car parking.
WFR/CC/7	Bromsgrove Road, Lower	HELAA	Important gap between
, 55, ,	Chaddesley		Chaddesley Corbett village and
	,		development around new
			school and garden centre
			should be retained
WFR/CC/10	Adj. Chaddesley Corbett	LPRPO	Substantial surface water flow
	School		on site. Nearby ponds. Other

			sites available in parish which are more suitable
WFR/CC/11	Adj. Bentley Grove Mustow Green	LPRPO	Open countryside characterised by scattered farmsteads. Adverse impact on openness and adjacent listed building
WFR/ST/9	Cursley Distribution Park	LPRPO	Not considered sustainable location for residential development. Allocate as Previously Developed Site in the Green Belt for employment use

# Appendix 4 Sites included in Pre-Submission Local Plan (October 2018) but not in Preferred Options

HELAA Ref	Location	Source of supply	Reason for inclusion
AS/3	Chester Road South	HELAA	Outline permission for residential
	Service Station		development
AS/20	Land north of Bernie	HELAA	Small Greenfield site in sustainable
	Crossland Walk		location
BHS/10	Frank Stone Building	HELAA	Brownfield site now being actively
			marketed – most suitable for
			employment uses
BHS/17	Rock Works	HELAA	Brownfield site – local group looking to
			buy site and relocate there from
			Industrial Estate – employment use as
			minimal natural daylight
BHS/38	Kidderminster Fire	HELAA	Relocating to new Emergency Services
	Station		Hub on Stourport Road. Site available for
			conversion / redevelopment for
			residential use
BHS/39	Boucher Building	BLR	Brownfield site – suitable for residential
			use. Town centre site
FHN/11	BT Building Mill Street	BLR	Brownfield site being marketed.
			Surrounded by mainly residential uses
FPH/5	Ambulance Station	HELAA	Small brownfield site in residential area
FPH/15	Severn Grove Shops,	LPRPO	Current allocation – bring forward
	Rifle Range Estate		during plan period – subject to viability
FPH/19	164/5 Sutton Park	LPRPO	Small Greenfield site. Application
	Road		submitted
LI/12	Former Burlish Golf	Other	Fire damaged buildings - golf course now
	Course Clubhouse		closed. Back in WFDC ownership.
			Suitable for small-scale employment use
WA/KF/3ph1	Land at Low Habberley	LPRPO	Release single field from Green Belt for
			housing. Rear boundary to be reinforced
			with additional planting to provide
			robust Green Belt boundary.
WFR/WC/12	Lawnswood, Cookley	HELAA	Suitable for small-scale housing scheme
			to meet local needs – bring forward via
			Neighbourhood Plan
WFR/WC/33	Lea Castle West	LPRPO	Allocate as part of wider new village at
	(A449)		Lea Castle
WFR/WC/34	Lea Castle North	Other	Allocate as part of wider new village at
	(Axborough Lane)		Lea Castle
WFR/WC/36	Rock Tavern Car park	LPRPO	Small brownfield site in hamlet of
	Caunsall		Caunsall. Remain as washed over Green
			Belt
WFR/WC/37	Land at Caunsall Road	LPRPO	Allow limited development along
			frontage of site only – continue building
			line along Caunsall Road

AKR/10	Queens Road Shops Areley Kings	LPRPO	Brownfield redevelopment site. Current allocation. WFCH propose to redevelop for housing and also provide convenience store and meeting facility
AKR/18	Land at Yew Tree Walk Stourport	LPRPO	Site in Green Belt adjacent to urban edge. Sustainable location
LI/11	Land west of former school site Coniston Crescent (formerly part of golf course)	Other	Logical rounding off of the northern urban edge of Stourport with access to be taken off the Kingsway
MI/7	Worcester Road Car Sales (southern part)	HELAA	Residential redevelopment suitable as extension to housing estate to rear of site
MI/11	3 Sandy Lane Titton	HELAA	Vacant former scrap yard with dwelling on site – residential uses to rear
MI/24	Land adj. Rock Tavern, Wilden Lane	HELAA	Small infill plot – to remain washed over Green Belt
MI/36	Firs Yard, Wilden Lane	LPRPO	Allocate as gypsy site – existing use
MI/38	School site Coniston Crescent	LPRPO	Logical rounding off of the northern urban edge of Stourport with access to be taken off the Kingsway. Empty former school buildings to be demolished
BR/BE/1	Bewdley Fire Station	HELAA	Town centre location – will become surplus when Emergency Services Hub opens on Stourport Road Kidderminster
BR/RO/2	Lem Hill Nurseries Far Forest	HELAA	Brownfield site just outside of settlement boundary.
WA/UA/1	Bellman's Cross Shatterford	HELAA	Brownfield site. Access from Arley Lane by village hall. Frontage development to continue terrace along A442
WA/UA/6	Red Lion Court, Bridgnorth Road	LPRPO	Brownfield site suitable for 2 dwellings adjacent recent redevelopment (in Shropshire). Remain washed over Green Belt
WFR/CB/2	Station Yard Blakedown	LPRPO	Allocate for station car parking as residential use not suitable on amenity grounds
WFR/CC/8	Fold Farm Chaddesley Corbett	LPRPO	Suitable for small infill development to meet local housing need

# Appendix 5 Amendments to Sites included in Pre-Submission Local Plan (July 2019)

HELAA Ref	Location	Source of supply	Reason for inclusion
AKR/18	Land at Yew Tree Walk	LPRPO	Site removed – see Appendix 6
WFR/CB/3	Land at Station Drive Blakedown	HELAA	Rail Investment Strategy and Worcestershire Local Transport Plan – allocation for station parking with housing development – see Appendix 6
LI/10	Land r/o Zortech Ave	PO	Now proposed for employment
LI/12	Former Burlish Golf Course Clubhouse	other	Proposed site for travelling showpeople
LI/13	Land off Zortech Ave	other	Additional employment site

### Appendix 6 Justification for Key Site Amendments in Pre-submission Local Plan (July 2019)

### Land off Yew Tree Walk – AKR/18 – justification for removal from Pre-Submission Local Plan (June 2019)

Pre-submission Local Plan (Oct.18) proposes allocation of 85 dwellings.

A number of issues have come to light since this site was proposed:

- 1. Information provided by residents on the site's history shows that the site does not meet the NPPF (2019) definition of previously developed land. The site was used as a sports field and owned by the MEB prior to September 1957 when it was sold to the Patrick family. Its use continued as a sports field even after the power station closed, primarily for junior football. There is no evidence of the field ever being previously developed. There has been no extraction of sand and gravel at this site as mentioned by the agent for the landowner.
- 2. The plateau was formed by the deposit of unwashed and ungraded PFA plus other waste materials onto an area of rough pasture which was (and still is) subject to flooding.
- 3. Information provided from the residents' group also questions the stability of the land and the practicality of actually building on the site. A landslip occurred earlier this year after a relatively dry winter. Any development would require extensive piling to depths of possibly 15m. Network of badger setts on site would make this problematic. Any development is unlikely to be viable.
- 4. Protected species on site would severely limit the developable area
- 5. Impact on biodiversity along Severn Valley corridor as the site forms part of a wildlife corridor
- 6. Impact on views from Conservation Area at Areley Kings St.Bartholomew's Church is clearly visible from the site even in mid summer; the Conservation Officer has now reviewed his previous advice and has flagged this up
- 7. Contamination issues site is made up of pulverised ash brought from the power station and tipped in order to provide an improved playing surface for sports pitches. Only trees that are PFA tolerant have managed to populate the site. Evidence of poisoning in surrounding areas where contaminants have leached out
- 8. Development would exacerbate horrendous traffic congestion around 2 schools nearby
- 9. Residents are keen to see land protected as open space and nature area
- 10. Ecological appraisal suggests a large buffer is required to protect sensitive areas from development. Driven piles would have catastrophic impact on wildlife.
- 11. Development would have to demonstrate biodiversity net gain in order to be approved

#### Land at Station Drive Blakedown - WFR/CB/3 – justification for inclusion in Pre-Submission Local Plan July 2019

The above site is proposed for removal from the Green Belt and allocation as a car park for rail users and approximately 50 dwellings.

The rail stations at Kidderminster and Blakedown have seen a growth of over 146% in passenger numbers over the last 20 years. They currently provide a total of 234 car park spaces which equates to 1 space for every 12 passengers. The Worcestershire average is 9. The proposed 80 spaces at Station Yard in Blakedown (WFR/CB/2) will bring local capacity up to the County average of 1 space per 9 passengers. However, allowing for the projected 99% growth during the 30 years of Network Rail's plan would require a further 310 plus spaces. Although Kidderminster Station is currently being rebuilt, there is limited capacity for further car parking on the site and the local highways network is so congested that any expansion would be precluded.

The land at Station Drive would be suitable for up to 170 car park spaces. This would help to address this shortfall and encourage sustainable growth in rail. The current station only offers car parking for 10 spaces. As a result of this, there are many vehicles parked on the local streets next to the railway. The additional car park would help to relieve the pressure for parking on the local roads. The significant growth proposed at Lea Castle and East of Kidderminster within the Wyre Forest Local Plan Review provide further justification for an increased demand and therefore parking capacity at Blakedown railway station.

Blakedown village is also a well-serviced village with a 2-form entry primary school, modern sports facilities, village hall and local shop. Medical facilities are available in Hagley which is easily accessible by bus or rail. Both the Neighbourhood Plan and the Housing Register show there is a requirement for more housing in the village. A development of up to 50 dwellings is also proposed on the site to cater for this need. The site is well-contained in Green Belt terms with the stream and wildlife corridor forming a natural boundary. The site is well-screened from the A456. It is adjacent to key facilities such as the school, sports facilities, village shop as well as being on a bus route with a bus stop adjacent to the site boundary.