

Matter 3: Overall spatial strategy, the Green Belt and the overall housing and employment land requirements

Response on behalf of

Euro Property Investments Ltd.

MATTER 3

Introduction

1. Harris Lamb Property Consultancy (HLPC) are instructed by Euro Property Investments Ltd. (EPIL) to prepare a response to the Inspector's issues and questions in relation to Matter 3. EPIL are promoting land at Stourport Road, Bewdley for residential development and the site is currently proposed to be removed from the Green Belt and is identified as a draft housing allocation in the Plan under Policy WA/BE/1. EPIL support the proposed allocation but wish to comment on other aspects of the Plan more generally. Our comments to Matter 3 should be read in this context. We set out our detailed responses to the Inspector's questions below.

Q3.1 Overall, does the Plan set out a sound spatial strategy for meeting development needs, including any unmet need from neighbouring areas, and protecting and, where possible, enhancing the environment? And in particular:

a) is the broad apportionment of housing, economic and other development to the various centres, locations and rural areas throughout the District consistent with the Plan's spatial vision and objectives, and does it promote sustainable patterns development?

2. EPIL agree that the broad apportionment of housing, economic and other development to the various centres throughout the District is consistent with the Plan's spatial vision and objectives. In light of EPIL's land interests in Bewdley we particularly welcome the Council's intention to allocate land for residential development at Bewdley and support the draft allocations that have been identified. In directing growth to locations such as Bewdley, this will enable the Council to meet the needs of the District in sustainable locations, thereby contributing to the objective of securing sustainable development.

b) is it based on adequate evidence, consistent with national planning policy, and is it deliverable within the Plan period? Wyre Forest District Local Plan 2016-2036:

3. Yes, EPIL agree that the Plan is based on adequate evidence including the Site Selection Paper (SSP01), the Housing Topic Paper (ED3) and the Housing and Economic Land Availability Assessment 2019 ("HELAA") (HOU04) and that these demonstrate that the minimum housing requirement is deliverable.
4. Our original representations supported the overall level of growth that is proposed within the Plan, specifically in regard to the quantum of housing proposed and we consider that the sites that the Council have identified to deliver this growth are suitable and deliverable. In terms of delivery, EPIL can confirm that it is currently preparing an outline planning application for the

site and intends to lodge this with the Council in advance of the Examination commencing. The application will be supported by a full suite of supporting reports which confirms that the site is free from any technical, physical or environmental reason that would prevent its development. As such, we can confirm that site WA/BE/1 will be deliverable and will contribute to the overall delivery of the whole plan.

c) have the potential impacts on the natural environment, landscape, infrastructure, flood risk, air quality and other matters been assessed adequately, and does the Plan provide for mitigatory measures where necessary?

5. Yes, we consider that they have been thoroughly assessed and which have resulted in the preferred allocations being identified. In respect of our own investigations at Stourport Road, Bewdley we can confirm that these matters have been investigated and have been demonstrated not to pose a constraint to development.

d) does it make as much use as possible of suitable, previously developed or 'brownfield' land, under-utilised land and buildings, land in public ownership and regeneration opportunities?

6. In our view the Council have thoroughly assessed the availability of brownfield land through the "HELAA" and that suitable development opportunities on such sites are reflected in the draft allocations. Furthermore, we support the conclusions in the Site Selection Paper that there are not enough brownfield sites to meet the housing requirement (paragraph 3.20) and that in light of this there is a need to consider release of land from the Green Belt in order to meet the development needs of the District going forward.

e) does it promote the development of a good mix of sites for new homes?

7. Whilst EPIL's focus is principally on Bewdley, we consider that the range of draft housing allocations in the town will deliver a good mix of sites for new homes. The sites chosen are all well related to the town centre and therefore, easily accessible to the range of shops, services and facilities that are present there. Furthermore, the distribution of sites around the town mean that they will meet different markets for new housing within the town, thereby creating choice and helping to satisfy demand. We consider that the sites identified can deliver a range of different homes of differing sizes and tenures including affordable housing. We will comment further on this in our response to Matter 6.

f) does the strategy seek to optimise the density of development in line with national planning policy to make the most effective use of land?

8. Chapter 11 of the Framework sets out policies in regard to making efficient use of land in new development. Policy 8A Housing Density & Mix sets out the Council's approach to density stating that new development on green field sites and in town centres should achieve an average density of 35 dph. The policy clearly sets out the intention to make effective use of land and as such is in accordance with national policy set out in the Framework. However, the need to make effective use of land from a density point of view has to be balanced with the Council's other objective of achieving 40% green infrastructure on sites over 1 hectare as set out in Policy 14. EPIL are concerned that the two policy objectives are not always achievable and that looking to deliver one will be at the expense of the other. EPIL argued in their representations to the

Pre-Submission Draft Local Plan that the requirement to seek green infrastructure on sites should be applied more flexibly in order to achieve a more efficient use of land.

g) is there a reasonable prospect that the necessary infrastructure will be delivered in a timely manner to support the planned development?

9. No comment

h) has the Plan been adequately informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development?

10. Yes. The Green Belt topic paper (ED20) confirms at paragraph 6.2 that the Council held Duty to Co-operate meetings with its neighbouring authorities and were asked whether they would be able to accommodate any of the District's needs. The Council confirm that no neighbouring authority was willing to accommodate any of its needs, principally because they are also Green Belt authorities that are also looking at removing land from the Green Belt in order to meet their own development needs. Signed Statements of Common Ground confirm this to be the case (ED10B, ED10C, ED10D, ED10E, ED10F, ED10G).

Q3.2 a) Taking account of national planning policy on exceptional circumstances, has the need for changes to the Green Belt boundary been established, and has due regard been paid to its intended permanence in the long term? Is the proposed designation of Reserved Sites likely to be adequate in this respect? [Note: Policy 7B on Reserved Sites will be considered in detail under Matter 6]

11. Paragraph 136 of the Framework confirms that one established Green Belt boundaries should only be altered in exceptional circumstances which are fully evidenced and justified and through the preparation or updating of plans. The Council set out its case for what the exceptional circumstances are for amending the Green Belt in paragraphs 7.13 to 7.16 of the Local Plan Submission Document (January 2020). The key reason for needing to remove land from the Green Belt is due to the unavailability of sufficient previously developed land within the urban area. The Council's ("HELAA") (HOU04) and Site Selection paper (SSP01) confirm that there are insufficient sites available to meet the housing requirement without Green Belt land release. In the absence of sufficient previously developed land within the urban area, the Council would not be able to meet its development needs over the Plan Period. As such, we agree that these demonstrate exceptional circumstances that warrant land being removed from the Green Belt.
12. As well as demonstrating exceptional circumstances to justify the release of land from the Green Belt, the Framework also states this needs to be evidenced. The Council have undertaken a detailed Green Belt review which we consider constitutes a sound evidential basis upon which decisions have been taken to remove land from the Green Belt.
13. As the promoters of Stourport Road, Bewdley site (WA/BE/1) which is proposed to be removed from the Green Belt and allocated for residential development we concur with the findings and conclusion of the Green Belt review and agree that the site is suitable to be removed from the Green Belt and that exceptional circumstances exist to justify this. Furthermore, once the site is removed from the Green Belt a new defensible boundary to the Green Belt will be formed by the existing roads that enclose the site.

b) Does the Plan provide adequately for compensatory improvements to the environmental quality and accessibility of remaining Green Belt land?

14. Yes, we are of the view that the compensatory measures outlined in the Green Belt Topic Paper (ED20) are appropriate. The compensatory measures include the creation of two new Country Parks, one in the Stour Valley to the north of Kidderminster and the other on part of the former Burlish Park Golf course, which lies to the north of Stourport on Severn. In combination, we consider that the two new facilities will provide improved recreational access to the Green Belt and will adequately compensate for the removal of land from the Green Belt.

3.3 Having regard to the housing and employment need figures and the spatial planning considerations above, is it justified to set 5,520 dwellings¹ (at least 276 dwellings per year) as the housing requirement for the Plan period and at least 29ha as the employment land requirement?

15. As detailed in our original representations to the Pre-Submission Draft Local Plan we support the proposed housing requirement of 5,520 dwellings (276 dpa). We note that the emerging Plan has identified an overall housing land supply of circa 6,365 dwellings, which is approximately 15% above the proposed housing need of 5,520 dwellings. This approach is supported as it will provide added flexibility in case the proposed allocations do not deliver as expected. It is, therefore, entirely appropriate for the emerging Plan to identify sites to deliver a greater number of dwellings than the minimum housing needs figure.
16. We also note that due to the presence of Green Belt throughout a large part of the District, should the Council experience a five year housing land supply shortfall, this will pose problems when seeking to engage the tilted balance set out in paragraph 11d) of the Framework as a way of seeking to increase the supply of housing outside of existing settlements. Allocating land over and above the minimum housing needs figure will help prevent this occurring and is therefore supported.

3.4 Should a housing requirement figure for each of the designated neighbourhood plan areas be set out in the Plan?

17. No comment