

Wyre Forest Local Plan Examination

Hearing Statement on behalf of Richborough Estates

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

November 2020

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Client
Richborough Estates

Our reference
RICQ3010

24 Nov 2020

1. Introduction

- 1.1 This Hearing Statement has been prepared on behalf of Richborough Estates in respect to land they are promoting to the north west of Habberley Road, Kidderminster ('the site'). A site location plan is enclosed at **Appendix 1**.
- 1.2 The site forms proposed allocation WA/KF/3 (policy 30.21) in the emerging plan. It represents a sustainable and deliverable opportunity for a minimum of 120 new homes and public open space.
- 1.3 Richborough Estates is currently engaged in pre-application discussions with the local planning authority regarding the proposed submission of an outline planning application for the site in early 2021. The application will demonstrate that the site is deliverable in the short term, with no technical constraints which prohibit the early delivery of the site.
- 1.4 Richborough Estates will attend hearing session 3. This statement provides written responses to Q3.1 to Q3.2 b) inclusive, and welcome the opportunity to participate in the Matter 3 hearing session on 13 and 14 January 2021.

2. Response to the Inspector's questions

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:

Q3.1 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?

- 2.1 Overall, yes.
- 2.2 Together with policy 7A, the overall spatial strategy proposed by policy 6B is sound. It proposes an appropriate strategy which, as a minimum, seeks to meet the district's objectively assessed needs over the plan period. This includes releasing Green Belt land around the district's most sustainable settlements.
- 2.3 National Planning Policy Framework (NPPF) (March 2019) states that the planning system should actively manage patterns of growth, focussing significant development on locations which are or can be made sustainable.
- 2.4 The plan's strategy and overall distribution of housing reflects this aim of national planning policy. Housing and employment growth will be directed to the most sustainable locations within the district, principally the main town of Kidderminster.
- 2.5 When totalled up (as per table 6.0.2 of the pre-submission draft (**CD SD01**)), the amount of growth to be delivered at Kidderminster is **74.5%** (including 27.5% at Lea Castle and 27.5% at the Kidderminster Eastern Urban Extension), with 19.5% of growth at smaller allocations around the town.
- 2.6 This approach is supported by the plan's evidence base. The Council's settlement hierarchy paper (July 2019) (**CD SH01**) demonstrates Kidderminster is significantly the most sustainable settlement in the district (scoring 33 out of 33), is more than double the size of the next largest town (Stourport-on-Severn), has two secondary schools, 27 bus services, it has a railway station with regular services to Birmingham and Worcester, and significant employment opportunities. The pre-submission plan Sustainability Appraisal (July 2019) (**CD SDO4**) identifies that Kidderminster "*...is the largest of the three towns and is the main centre for retail, industry and housing*" (page 21) and that development is particularly focussed there given it "*...helps to ensure that services will be available to the new residents*", which has "*...the widest range of retail, employment and services*" (table 6.3, page 50).
- 2.7 To better reflect the overall spatial strategy and the evidence base underpinning it, the vision would however benefit from more clearly recognising Kidderminster's role as the key focus for growth. This could be effectively achieved through a minor modification and including the following line at point 1 after the first sentence, "**Kidderminster**

remains the district's principle focus for growth given its range of retail, employment and services".

Q3.1 b) is it based on adequate evidence, consistent with national planning policy, and is it deliverable within the Plan period?

- 2.8 Yes, it is evidenced and consistent with national planning policy, as set out in our response to Q3.1 a) above.
- 2.9 The plan is also deliverable. In particular the proposed allocation on land at Low Habberley (policy 30.21 – WA/KF/3) is viable and deliverable within the first five years following the plan being adopted. The site is controlled by Richborough Estates and an application is to be submitted for the site shortly, which will demonstrate the site's early deliverability. More detail regarding this will be provided in our Matter 6 hearing statement.

Q3.1 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?

- 2.10 Yes, all potential impacts have been adequately assessed and the plan does provide mitigation measures where necessary.
- 2.11 Policy 14 (strategic green infrastructure) however needs some refinement to ensure it is consistent with other plan policies and does not compromise the plan's ability to deliver the district's housing needs in full, in particular its requirement for development to deliver a minimum of 40% green infrastructure on site.
- 2.12 Then NPPF defines green infrastructure as a "*network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for communities*" (glossary, page 67). This definition indicates green infrastructure provides a qualitative role. In this context, delivering less than 40% green infrastructure on site could provide more benefits if it is high quality, including of exceptional ecological value, and very accessible.
- 2.13 Furthermore, it conflicts with emerging Policy 20c (provision for open space, sports pitches and outdoor community uses in housing development). Bullet three of policy 20c requires new development to provide sufficient green infrastructure in accordance with Policy 14, however the precise amount will be determined through local evidence, (i.e. the playing pitch strategy).
- 2.14 The Council's Open Space Addendum (October 2018) (CD OS09) must form 'local evidence'. The Addendum provides specific quantitative open space requirements (including all types of strategic green infrastructure) for each proposed allocation, based on site capacity and the associated population generation. In the case of land to the north west of Habberley Road, Kidderminster, the Addendum indicates the open space requirements total 1.59ha. This totals less than 40% of the gross total site area.

- 2.15 Policy 14, as drafted, is therefore not justified by the evidence base and could compromise the plan's ability to effectively meet the district's housing needs over the plan period. It should therefore be modified to remove the 40% requirement for strategic green infrastructure and instead reflect the local evidenced needs (in particular the Open Space Addendum).

Q3.1 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?

- 2.16 Yes. The Council's own brownfield register (December 2017) identifies capacity for 2,598 dwellings only on brownfield land. This predominantly comprises the Lea Castle Hospital site, which is a proposed allocation in the Pre-Submission Plan. This is not sufficient to meet the Council's housing needs alone.

Q3.1 e) does it promote the development of a good mix of sites for new homes?

- 2.17 Yes. A mix of smaller, short term sites which require limited infrastructure improvements (such as the proposed allocation on land at Low Habberley (policy 30.21 – WA/KF/3)) and larger, longer term sites (such as the Kidderminster East SUE) are necessary to ensure the district can deliver housing immediately upon adoption of the plan and maintain a five year housing land supply across the plan period.

Q3.1 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?

- 2.18 For the development management process policy 8A provides sufficient flexibility through requiring an 'average' density 35 dwellings per annum unless it can be demonstrated it should be lower in response to surrounding landscape. This reflects that sites, in response to their surrounding context, may require a density proportionally higher or lower than 35 dwellings per annum.
- 2.19 In achieving the most appropriate density on a site the flexibility the policy provides in terms of housing mix is also welcomed, in particular the acknowledgement that the *"...actual mix of housing will be influenced by both the market and housing needs specific to the site"*.
- 2.20 This flexibility allowed in a site's density will ensure the plan is able to adapt to rapid change, as required by NPPF paragraph 11, and ultimately effective in meeting the district's housing needs.

Q3.1 g) is there a reasonable prospect that the necessary infrastructure will be delivered in a timely manner to support the planned development?

- 2.21 Yes. But should there be any delay, the mix of housing allocations proposed ensures the Council's five year housing land supply can be maintained through deliverable short term sites not reliant on significant infrastructure, such as the proposed allocation at Low Habberley (policy 30.21 – WA/KF/3).

Q3.1 h) has the Plan been adequately informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development?

- 2.22 Yes. Section 7 of the Green Belt Topic Paper (June 2020) (**CD ED2**) demonstrates that discussions were undertaken with all neighbouring authorities, none of whom were able to accommodate any of the Wyre Forest's identified housing needs. As per the Duty to Cooperate Statement (March 2020) (**CD SD10**) this includes Bromsgrove District, the South Worcestershire authorities, Shropshire, the Black Country authorities, South Staffordshire, and Birmingham City.
- 2.23 A number of these authorities are already not able to meet their own needs, including Birmingham whose adopted plan establishes a 37,900 dwelling shortfall up to 2031, and the Black Country authorities that indicated they have a shortfall of circa 26,000 dwellings up to 2038. A number of authorities, including Shropshire and South Staffordshire whom are Wyre Forest's neighbours, are already contributing to meeting these existing shortfalls.

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]

- 2.24 Yes, as demonstrated by our responses to Q3.1 d), e), f) and h).
- 2.25 Over **50%** of Wyre Forest is located within the West Midlands Metropolitan Green Belt. It completely surrounds the district's most sustainable town, Kidderminster, and covers at least half the area around the district's second and third largest settlements (Stourport-on-Severn and Bewdley respectively). The Green Belt has not been reviewed for the district's long term needs since the Local Plan adopted in 1996, over 22 years ago.
- 2.26 Densities are maximised on all proposed allocations and the Council has spoken to all its neighbours to explore whether they could accommodate any of their housing needs. None are able to do so.
- 2.27 Exceptional circumstances have therefore been established for reviewing Wyre Forest's Green Belt boundaries to ensure they are capable of enduring beyond the plan period, as required by NPPF paragraph 99. Indeed Green Belt release is necessary to ensure the plan is positively prepared and the district's housing needs are met in full, as well as ensuring the overall spatial strategy is effective and deliverable across the plan period.

Q3.2 b) Does the Plan provide adequately for compensatory improvements to the environmental quality and accessibility of remaining Green Belt land?

- 2.28 Section 9 of the Green Belt Topic Paper (**CD ED2**) sets out the Council's Green Belt compensatory improvements, including at Stour Valley Country Park and at the former Burlish Golf Course.
- 2.29 As set out Richborough Estates' **Matter 6 hearing statement**, further compensatory improvements can be provided through extending the red line allocation boundary of the proposed allocation at Low Habberley (policy 30.21 – WA/KF/3).
- 2.30 This additional land would retain Green Belt status and comprised enhanced landscaping planting to complement existing hedgerows and trees and enable public access to Green Belt which would otherwise remain in agricultural use. It would reinforce and formalise the Green Belt boundary. All development proposed would be located within the extent of the draft allocation. The site's open space strategy will also see the creation of a new, permanent and defensible Green Belt boundary to the west.

Appendix 1: Site location plan



Key

Allocation site boundary
5.64ha (13.94 acres)

Other land under control of
applicant

01050 m

Richborough
Estates

nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

Project

Habberley Road, Kidderminster

Drawing Title

Site Location Plan

Project Code	Drawing Nr	Rev
n1476	001-10	-
Date	Drawing Scale	
26.11.2020	1:1,250 @ A1	

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