



**Wyre Forest District Council  
Local Plan 2016-2036**

**Examination**

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

*(Policies 6B-6F, 7A, 7B and supporting text)*

**Wyre Forest District Council Response**

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## **Wyre Forest District Council**

### **Wyre Forest District Local Plan (2016-2036) Examination**

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

*(Policies 6B-6F, 7A, 7B and supporting text)*

**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:**

**Q3.1a) 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 of development?**

- 3.1.1 Yes, the Council considers that the broad apportionment of housing, economic and other development to the various centres, locations and rural areas throughout the District is consistent with the Local Plan's spatial vision and objectives, and the Plan does promote sustainable patterns of development.
- 3.1.2 The Plan's vision for the district is set out in table 3.0.1 of the Local Plan document (SD01). The Plan's Objectives are set out in table 3.0.2 of the Local Plan document (SD01). The Sustainability Appraisal (SD04) has appraised the sustainability impacts of the Local Plan vision and objectives, alternatives that were considered, individual proposed sites for development, and the strategic and detailed policies.
- 3.1.3 The Plan's spatial vision sets out that by 2036 the three main towns of Kidderminster, Stourport-on-Severn and Bewdley will continue to maintain their distinctive and separate identities. The outlying villages will have grown organically to meet their own needs. The vision also states that the Lea Castle site will be a new sustainable village with enough housing to generate a new village centre with its own local shop, primary school, employment uses and new and upgraded sports pitches. The Kidderminster Eastern Extension will be a well-designed residential development offering a choice of high quality new homes to meet local needs set within an extensive area of green space which is readily accessible to everyone in the area.
- 3.1.4 In terms of the economy, the Plan's vision states that by 2036 a vibrant and sustainable economy will exist in the district, primarily focussed around Kidderminster, Stourport-on-Severn and the Stourport Road Employment Corridor providing a range of jobs across the service, retail,

research and development and manufacturing sectors, with the infrastructure and a skilled population in place to support it. The vision goes on to say that the urban areas of Kidderminster and Stourport-on-Severn and the South Kidderminster Enterprise Park will be the main focus for employment but they are supported by the rural economy including several existing and significant industrial estates where sustainable growth will have occurred, and sustainable tourism.

- 3.1.5 The Housing Needs Study (2018) (HOU01) was undertaken following the publication of the 2016-based Sub-National household projections by the Government in September 2018. This study uses the Government's standardised methodology. Using the 2016-based household projections, it shows a minimum housing need of 276 dwellings per year. Further justification for the use of the 2016-based household projection can be found in the Housing Topic Paper (ED3). In addition to this, an additional 487 care home/nursing home bedspaces will be required (C2 uses) during the plan period. It should be noted that extra-care apartments, being full self-contained dwellings, form part of the housing supply. Policy 6A makes provision for this identified housing need during the plan period.
- 3.1.6 As set out in more detail in our response to Question 2.2, the Employment Land Review Update (2018) (ECON04) report appraised a range of employment land scenarios 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 Local Plan thus looks to allocate enough employment land to cater for this requirement. Policy 6A makes provision for this identified employment need during the plan period.
- 3.1.7 The use of the evidence base, including the Sustainability Appraisal (SD04), the Housing & Economic Land Availability Assessment (HELAA) (HOU04), the Site Selection Paper (SSP01), and the Green Belt Review Stages 1 and 2 (GB01, GB02), enabled the Council to take a spatially-balanced approach to identifying the key sites for the delivery of the development needs over the plan period. The Plan aims to site as much development as possible on brownfield land to achieve a sustainable pattern of development. Development opportunities in the existing urban areas have been thoroughly investigated and assessed. However, it was not possible to rely solely on brownfield sites in existing urban areas to meet the development needs. Flooding is also a constraint within all three towns within the district which restricts where new development can be located. It was therefore concluded that the development needs would require the use of some land within the current extent of the Green Belt. The Council has sought to prioritise brownfield land first,

followed by sustainable development on greenfield land, and sustainable development on Green Belt sites (some of which is previously developed and surplus public sector land). The Plan also includes two strategic sites that will accommodate a significant amount of the district's housing and employment needs whilst also providing social needs on site. The site at Blakedown railway station, which is allocated for a car park, will help to create a sustainable transport hub. Allocating land for a sufficient number of car parking spaces at Blakedown railway station is critical to the transport policies in the plan and the wider sustainability of Wyre Forest District.

- 3.1.8 Wyre Forest District has 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 three main towns of Kidderminster, Stourport-on-Severn and Bewdley from merging and retaining their individual characteristics. The eastern part of the District has good transport links to the West Midlands conurbation and onto the motorway network. This easy access to well-paid employment in the conurbation makes the eastern side of the District attractive to live in and more sustainable to develop. 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, with one crossing at Stourport and two at Bewdley. Two of these crossing points are in heavily congested town centres. Traffic would have to go through the heavily congested town centres to reach the main areas of employment in Kidderminster and further afield in the West Midlands conurbation. Kidderminster West is 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 Kidderminster 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. Large-scale development is not considered to be suitable to the west of Kidderminster as an extension of the town here 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.
- 3.1.9 A separate evidence paper entitled 'Site Selection Paper (2019) (SSP01)' has been prepared as part of the evidence base for the Local Plan and was consulted on at Pre-Submission stage. The Site Selection Paper draws together all the different streams of evidence in relation to each site and tells the story as to why some sites were allocated in the Local Plan and others were not.

- 3.1.10 The Settlement Hierarchy Technical Paper (2019) (SH01) assisted the Council in understanding the role that each urban area plays in terms of its sustainability and therefore its suitability for meeting development needs over the plan period. Policy 6B in the Local Plan sets out the settlement hierarchy in table 6.0.3. Policies 6C to 6F then set out the roles that each area will play in meeting development needs.
- 3.1.11 The Settlement Hierarchy Technical Paper (2019) (SH01) identifies Kidderminster as the main town within the district. The town has a full range of services and facilities and is well served by sustainable travel modes, including a mainline railway station, compared to the other parts of the district. Therefore, it is the most sustainable settlement and has been identified as the main focus for future development in the Plan.
- 3.1.12 Stourport-on-Severn is a large-sized market town and is considered to be the next most sustainable settlement in terms of the provision of services and facilities. The town has a range of shops and services which support the town but do not provide the range and choice available in Kidderminster (it has no main-line railway connection). Stourport-on-Severn does offer a range of employment opportunities. There is also direct public transport (bus) access to the South Kidderminster Enterprise Park which links Stourport-on-Severn to Kidderminster. Stourport-on-Severn is therefore considered to be the second most sustainable location in the district.
- 3.1.13 Bewdley is a smaller market town than Stourport-on-Severn and offers a more limited range of services and facilities. Bewdley is considered to be less sustainable and less suitable for growth because of a number of factors. Bewdley has a range of small local shops but does not have a large supermarket; therefore, Bewdley residents are reliant upon travelling to Kidderminster to access such facilities. Access to employment opportunities is also more limited in Bewdley, with many residents having to commute. Bewdley's ability to accommodate further growth is restricted for a number of reasons; there is little brownfield land available to develop either within or surrounding Bewdley, also topography, proximity to the River Severn and its floodplain. Bewdley is therefore considered to be the least sustainable of the three towns as a settlement for new development and growth is therefore more limited.
- 3.1.14 The district also has a number of outlying villages and hamlets and their level of service provision varies. The site allocation (WFR/CB/2) adjacent to Blakedown railway station has been chosen because of its close proximity to an existing public transport hub. The allocation for station car parking will provide a park and ride facility and create a sustainable

transport hub (as there is very limited car parking capacity at the station at present). The residential allocation at site (WFR/CB/3) will help address an identified local housing need in a location with access to a sustainable mode of transport.

3.1.15 As land to the west of the River Severn, Kidderminster West and Bewdley are so constrained; Kidderminster East and the strategic site allocations at Lea Castle and the eastern extension have been allocated for large-scale development and will require land to be released from the Green Belt. Both of these strategic sites have good transport links and are also within easy reach of railway stations at Kidderminster and Blakedown. As mentioned above, new station parking facilities are also planned at Blakedown Station.

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

3.1.16 Yes, the Local Plan is based on adequate evidence, consistent with national planning policy, and is deliverable within the Plan period 2016 to 2036. Appendix F of ED10a shows the site trajectory for delivering the spatial strategy as set out in the Plan. The sites are considered to be deliverable and developable.

3.1.17 Evidence can be considered to be robust where it is based on recognised or tried and tested methodologies including government guidance or best practice advice where this is available, up to date, tightly focussed, comprehensive and applied consistently.

3.1.18 Evidence for the Local Plan's overall spatial strategy for meeting development needs and for protecting and where possible enhancing the environment is based on a combination of evidence base studies. These include the Housing & Economic Land Availability Assessment (HOU04), the Site Selection Paper (SSP01), Settlement Hierarchy Technical Paper (SH01), Housing Need Study (HOU01), Employment Land Review update (ECON04), Green Belt Review (GB01, GB02, GB02a, ED20), Ecological Appraisals (GI06, GI07, GI08), Strategic Flood Risk Assessment (FR01), and Water Cycle Study (FR03, FR04, FR05), as well as the Sustainability Appraisal (SD04).

3.1.19 A Habitat Regulations Assessment (HRA) screening report was undertaken for the plan (SD15) and Natural England confirmed that an HRA was not necessary as there were no likely significant effects identified (SD16).

3.1.20 All the evidence base studies undertaken for the Plan are considered by the Council to be robust for the following reasons:

- a. All evidence is based on standard methodologies set out in government guidance or best practice advice which have been tested through examination. Where this is not the case as guidance or advice is lacking, methodologies are based on comparator studies which have been tested at examination. Where an assessment of a policy, site, location or need has been made, this has been consistent with the methodologies set out in the evidence study.
- b. All evidence studies are considered to be based on the most relevant and recent information in relation to where development should be apportioned in the District. This includes using the most up to date GIS mapping, evidence supplied to the Council by site promoters and assessments for specific uses such as housing and employment.
- c. All studies focus on the areas of the District which could contribute to meeting the development needs through a series of health checks, floorspace needs, site assessments and areas of search. The evidence is therefore considered to be tightly focussed and comprehensive.

3.1.21 As such, the Council considers that the evidence base used to support the Local Plan for the roles that various parts of the District will play in meeting development needs is robust.

3.1.22 The Green Belt assessment undertaken by Wood Group (previously Amec Foster Wheeler)<sup>1</sup> provides a coherent and substantive piece of evidence taken into account by WFDC in the preparation of the Local Plan.

3.1.23 Whilst there is no prescribed methodology for the preparation of Green Belt studies, there is a standard of good practice, now widely tested at Local Plan Examinations across the country, which sets out professional judgements on the role of the Green Belt against the purposes set for it within National Policy. Typically, this takes the form of a grading of the role of individual strategic parcels of Green Belt based on questions in respect of the maintenance of openness and permanence of the land in relation to current development. The Green Belt study undertaken for WFDC follows this approach and is comparable to studies produced by

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<sup>1</sup> (GB01) GB review – Part 1: Strategic Analysis (September 2016) - <https://www.wyreforestdc.gov.uk/media/2973292/Wyre-Forest-Green-Belt-Review-Strategic-Analysis-FULL-DOCUMENT-compressed.pdf>

(GB02) GB review – Part 2: Site Analysis (May 2018) - <https://www.wyreforestdc.gov.uk/media/3991681/Green-Belt-Review-Part-II-Analysis-of-Sites-May-2018-update.pdf>

(GB02a) GB review – Part 2: Site Analysis (May 2018) – Appendix C - <https://www.wyreforestdc.gov.uk/media/3991987/Green-Belt-Review-Part-II-May-2018-Appendix-C.pdf>



Wood for other Local Authorities which have subsequently been tested at Examination, including Waverley, Stevenage, Cheltenham, Gloucester & Tewkesbury and Staffordshire Moorlands.

**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?**

3.1.24 The Council considers that all potential impacts on the natural environment, landscape, infrastructure, flood risk, air quality and other relevant matters have been assessed adequately in the various evidence studies and appraisals/assessments, which have underpinned the development of the spatial strategy.

3.1.25 The sustainability appraisal (SA) assessed the impact of each plan policy and site, and of the plan as a whole, on biodiversity, the landscape, flood risk, agricultural land quality, whether the site is on greenfield or brownfield land, the historic environment, and distance from various amenities. Table 6.3 of the 2019 SA (SD04) summarises the overall impacts of the plan on these issues.

3.1.26 Chapter 7 of the 2019 SA lists the mitigation measures included in the plan. These include:

- Policy 11E on protecting and enhancing geodiversity which aims to protect geological sites and geodiversity generally.
- Policy 15A on water conservation and efficiency, which aims to reduce per capita water use; Policies 15B on sewerage and water quality and 15D on sustainable drainage systems which aim to prevent and reduce water pollution; and Policy 15C on flood risk management which aim to prevent and reduce flooding.
- Policies 11B and 26 on the historic environment, which aim to protect heritage assets and their settings, and make creative and sympathetic reuse of historic buildings.
- Policy 11C on landscape character which aims to protect and enhance the unique character of the district's landscape and establish a Severn Valley Regional Heritage Park; and Policies 11A and 27A on quality design and distinctiveness.
- Policy 11D on protecting and enhancing biodiversity which aims to deliver measurable net gains in biodiversity; and Policy 14 on strategic green infrastructure, which aims to provide a range of new green infrastructure as part of new development.

- For the *Green Belt*: Policy 25 on safeguarding the Green Belt which prevents development in the Green Belt except under strict conditions.

3.1.27 The SA also reviewed each of the major site allocations in terms of mitigation measures. The allocations include as mitigation:

- For *soil and land*: carrying out decontamination where necessary.
- For *water*: Locating dwellings outside of the area that is at risk of flooding, providing a buffer zone along a brook, hydraulic modelling to confirm the extent of the floodplain, preventing habitable rooms at ground floor level, providing sustainable drainage systems to control drainage on site, requiring no additional surface water discharge to leave the site.
- For *heritage*: Retaining buildings and views that are historically important, protecting the setting of heritage assets, relating the scale and design of the development to existing heritage assets, carrying out archaeological assessments.
- For *landscape*: Providing new landmarks, incorporating green areas into the development, providing areas of public open space, requiring buildings to be consistent with the local vernacular, using changes in site levels to reduce the overall height of the built form.
- For *biodiversity*: Protecting and enhancing woodland and river/canal-side areas, enhancing existing hedgerows, retaining mature trees, providing buffers, providing bat and bird boxes, providing living walls and green roofs, carrying out bat/otter/ecological surveys, preventing lighting at bat habitats, securing woodland management, limiting access to existing woodlands, exploring the possibility of opening up an existing highway drain, creation of a linear nature reserve.
- For the *Green Belt*: Limiting building heights to those of existing buildings, providing extensive landscaping and tree planting to screen boundaries, retaining existing boundary hedgerows and trees, limiting densities in parts of the site to create a more rural feel.

3.1.28 The Site Selection Paper (SSP01) also includes an analysis of constraints affecting potential allocations in appendix 1. This analysis was updated in appendix 4 of ED3 (Housing Topic Paper).

3.1.29 The effects of development on the openness and permanence of the Green Belt have been considered at the site scale (GB02 & GB02a) brought together in the Green Belt Topic Paper (ED20) and accompanying Technical Notes (ED20A/B). Together with the elements of the evidence base noted above, the Green Belt study provides a

reference point for judgements at strategic and local (site) scales on the likely impacts of development and appropriate mitigation to reduce those impacts to the smallest possible extent. As such the Green Belt study is not used as a decision-making tool in isolation.

3.1.30 Transport evidence papers (IFT02, IFT03 and IFT04) have also been produced to support the Local Plan. These consist of the Transport evidence paper (IFT02) which details the work undertaken to assess the growth and identify the transport interventions necessary to support the plan and the proposed housing and employment growth. The results of the transport modelling have been used to develop a combination of measures to mitigate the impacts of the increased traffic, including:

- Real Time Information Systems at bus stops in key corridors.
- Microprocessor Optimised Vehicle Actuation (MOVA) software within traffic signals to increase capacity by 15%.
- A series of highway schemes on the A449, A450, A451 and A456.
- Enhancements to rail station car parking at Blakedown Station.
- Investment in active travel corridors for walking and cycling to Kidderminster and Bewdley.
- Personalised travel planning on all new developments.

3.1.31 Together these schemes will assist in reducing the impact of development on the network and provide a realistic series of alternatives to car travel to aid modal shift. Providing alternatives to car travel will encourage the use of public transport, walking and cycling, which will reduce the reliance on car travel and their associated air pollution problems.

**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?**

3.1.32 Over the current adopted plan period most of the development within Wyre Forest District has taken place on previously developed or brownfield land. This type of development has had minimal effect on the Green Belt or community and settlement identities. The Council wants to continue with a brownfield-led strategy in the district's three towns because this protects green areas, reduces the need to travel and generally provides new homes near existing services and infrastructure. However, the capacity from brownfield sites is no longer sufficient to provide the number of homes that are required over the plan period. The SA states that "During the proposed Local Plan period there is not enough previously developed land for all the housing and employment need. Therefore, some greenfield sites, including some that are currently

in the Green Belt, will need to be developed.” (SA para 3.5). A Green Belt Review (GB01, GB02) was undertaken as part of the background evidence base for the Local Plan Review.

- 3.1.33 The Green Belt in Wyre Forest District covers 11,216 hectares of land. This equates to 57.4% (over half) of the district being covered by Green Belt. The Local Plan proposes a reduction in the Green Belt which amounts to 2.1% of the current designation. In total, including those sites already completed, under construction and committed, the Plan allocates 49% of housing on brownfield sites. This brownfield percentage includes the 600 dwellings at Lea Castle ex-hospital site (this takes into account viability and flood risk issues). The remainder of site allocations comprises greenfield land that is not in the Green Belt (7%) and Green Belt greenfield land (44%). There is limited greenfield capacity on suitable and sustainable sites to the west of the River Severn (i.e. non-Green Belt locations).
- 3.1.34 The release of Green Belt land is the most sustainable option for the district. The spatial strategy for the district is to focus development on the most sustainable settlements, and in order to achieve this, the Council needs to release Green Belt land. The Green Belt land take for the Plan equates to 2.1% for all of the Green Belt site allocations in the Plan.
- 3.1.35 The Housing and Economic Land Availability Assessment (HELAA) (HOU04) has assessed sites across the district and has considered whether development capacity could be identified from sites within the urban areas to limit the loss of greenfield and Green Belt land. It remains the case however, that a proportion of the development requirement for the district would remain unmet, unless Green Belt land is released for development to meet the full extent of the development need for the district. The HELAA included a number of ‘Call for Sites’ as well as a comprehensive desktop review to identify any potential sites which could help to meet future development needs. This included an analysis of the following types of sites:
- 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 areas

- Large-scale potential redevelopment areas
- Sites in / adjoining rural settlements and rural exception sites
- Potential urban extension sites around the three towns

3.1.36 All of the sites in the HELAA were presented to the Local Plan Review Panel members during the various stages of the Local Plan Review. (The Local Plan Review Panel is made up of the District Councillors together with representatives from the three Town Councils.) The Sustainability Appraisal (SD04) also looked at all of the sites in the HELAA, including those that had been discounted in the initial stages.

3.1.37 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, some brownfield sites have not been allocated in the Local Plan as they were considered to be not viable and undeliverable. The Site Selection Paper (SSP01) outlines the process undertaken and refers to the HELAA (HOU04) being revisited and the Brownfield Land Register first being published in December 2017.

3.1.38 The Council considers that it has undertaken a thorough assessment of potential sites during the Local Plan review, which included brownfield sites, under-utilised land and buildings, and land in public ownership. The Council is therefore satisfied that it has utilised as much as possible of suitable, brownfield land, under-utilised land and buildings, surplus land in public ownership and regeneration opportunities. The Plan allocates 49% of housing development on brownfield sites. It also utilises surplus public sector land at the Lea Castle site.

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

3.1.39 Yes. There are 59 sites proposed for allocation for housing. 38 of the proposed sites are brownfield. There are two large strategic allocations to the north-east of Kidderminster based around the former Lea Castle Hospital site and the eastern extension to the town. Both allocations are currently in the Green Belt. These two strategic allocations will enable the delivery of planned sustainable developments with around 1400 dwellings each together with primary school, community facilities, employment land, open space and infrastructure.

3.1.40 NPPF 2018 paragraph 68 a) states that, to promote the development of a good mix of sites, local planning authorities should identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved. The Council has undertaken an analysis of sites either proposed in the

Local Plan or on the Brownfield Register which are 1 hectare or smaller. Details can be found in Appendix 1 of the Housing Topic Paper (ED3). Small sites proposed for allocation total 406 dwellings with a further 243 dwellings available on small sites included on the Brownfield Register. Together this totals 649 dwellings which is more than 10% of the 5,520 housing requirement.

- 3.1.41 The mix of allocated sites in the Local Plan will appeal to different markets. There are also several large brownfield urban sites which would appeal to some people whilst the urban extensions would suit different groups.

**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?**

- 3.1.42 Yes, the density of development on site allocations is considered to make the most effective use of land. Individual site constraints have been taken into account and the net developable area and development capacity calculated accordingly. Policy 8A in the Plan sets out the housing density and mix requirements. The two strategic site allocations also include at least 40% green infrastructure on site, which is consistent with Policy 14 in the Local Plan. The Sustainability Appraisal update report produced in June 2020 (ED5) states: "The public response to Covid-19, including much greater use of green spaces, and increased walking and cycling, has also highlighted the importance to people of green spaces, homes with gardens, and facilities that are easily accessible by non-car modes." The Local Plan includes a number of policies to encourage green infrastructure and includes significant new areas of publicly accessible green space. The Council considers this to be important for the health and well-being of its residents, but also to help combat the challenges the district faces with climate change.

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

- 3.1.43 The Infrastructure Delivery Plan (IFT01) sets out a schedule of the necessary infrastructure for the spatial development strategy put forward in the Plan. Appendix 1 lists the key elements required in terms of transport infrastructure and education provision. The largest schemes are Churchfields Link Road (already funded and construction on course to complete by December 2020) and Blakedown Rail Station car parking phase 1 and phase 2. There are also several small highways schemes estimated to cost £1-2 million which will require S106 contributions from a number of the sites. Two new primary schools will be required on the strategic sites. Each site is expected to provide the land required

together with a contribution of £13 million. The potential for GP surgeries (either satellite or relocations of existing) is also being explored for the strategic allocations. This would also be covered by developer contributions. The Council considers that the necessary infrastructure will be provided in order to allow the planned development to go ahead as scheduled in the site phasing tables (ED11). It should be noted that the costings provided in the IDP are worst case scenario without any external funding being made available. There are no sites proposed which require major highways infrastructure to enable their development which have not already been externally funded.

**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?**

- 3.1.44 The Council held Duty to Co-operate meetings with its neighbouring authorities during the preparation of the Local Plan. During these meetings, the Council specifically asked neighbouring authorities whether they are able to accommodate any of the District's development needs. No neighbouring authority has indicated a willingness to accommodate any of the development needs for Wyre Forest District. This is mainly because they are Green Belt local authorities themselves, or they cannot accommodate their own needs and are looking to export some of their growth to their neighbouring authorities. This is evidenced in the Statements of Common Ground (SofCG) prepared by WFDC, which form part of the Duty to Co-operate Statement (SD10). The SofCG also include minutes of the meetings held, which includes minutes of the question being asked. The SofCG were formally signed off by Wyre Forest District Council and the relevant neighbouring authorities.
- 3.1.45 The Council had prior knowledge that some nearby local authorities were already looking to export their growth so knew they had no capacity to take on additional growth from Wyre Forest District. For further information, please see the GL Hearn work for the 'Greater Birmingham HMA Strategic Growth Study (2018)'.

**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?**

- 3.2.1 The Green Belt study conducted for WFDC (GB01, GB02, GB02a) considers the role of the Green Belt at strategic and local (site) scales, the analysis focusing on the principal purposes of the Green Belt, being openness and permanence. The analysis is transferred to the Green Belt Topic Paper (ED20) via the accompanying Technical Notes (EB20A/B).

The matter of Green Belt permanence, as interpreted as the quality of Green Belt boundaries of individual parcels and sites, focuses on whether existing boundaries can contain development or whether these need to be created as part of site masterplanning. Longer term permanence of the Green Belt is a matter for subsequent plan review, informed by its evidence base.

- 3.2.2 The Reserved Housing Sites specified within Policy 7B (ADR sites) have been considered as part of the Green Belt assessment and conclusions for likely harm to the openness and permanence of the Green Belt are set out in GB02 and GB02a. ADRs are treated as Green Belt land until they are allocated for development through the plan-making process and Exceptional Circumstances tests will be applied prior to approval of development, as guided by the NPPF (paras. 137 & 138). The proposed designation of the Reserved Housing Sites is therefore considered to be adequate and will complement the consideration of wider development needs in the future.

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

- 3.2.3 The Wyre Forest Local Plan contains detailed proposals for the enhancement of the wider Green Belt through the creation of a new Country Park to the north of Kidderminster and land between Kidderminster and Stourport (see Green Belt Topic Paper section 9, ED20). This, along with the proposals of larger developments through implementation of the District's Planning Obligations SPD makes provision for off-site compensation of sites in the Green Belt. Stour Valley Country Park as proposed will cover 116 hectares (of which 72 hectares is Green Belt) and the former Burlish golf course proposal is 51 hectares of Green Belt land. In addition to these, the Kidderminster Eastern Extension strategic site allocation will provide 12 hectares of recreational land within the Green Belt as part of the proposal.
- 3.2.4 There is no formal guidance on the extent or type of compensatory / enhancement measures to be undertaken, assuming that case-by-case determination is appropriate.



**Q3.3 Having regard to the housing and employment need figures and the spatial planning considerations above, is it justified to set 5,520 dwellings<sup>1</sup> (at least 276 dwellings per year) as the housing requirement for the Plan period and at least 29ha as the employment land requirement?**

- 3.3.1 There are 11,216 hectares covered by the West Midlands Green Belt in Wyre Forest District. This equates to 57.4% of the total area. The Council proposes through the Local Plan to reduce this amount by 2.1%. The Council considers that it is justified to have a housing requirement of 276 dwellings per annum. The justification for using a requirement of 276 is set out in the Housing Topic Paper (ED3).
- 3.3.2 This requirement is purely to meet the local housing need; it does not aim to meet unmet need from surrounding districts. Wyre Forest District is a standalone housing market area. It does not form part of the Greater Birmingham and Black Country Housing Market Area. The Housing Needs Study 2018 (HOU01) concludes that Wyre Forest District is a largely self-contained housing market area in terms of migration. Also, the 2011 Census showed that of those working in the District, 74.4% also live there. Also, having a housing requirement of at least 276 dwellings per year will help to boost the housing supply at a national level and is consistent with the NPPF aim of "significantly boosting housing supply".
- 3.3.3 At the Issues and Options stage in 2015, seven alternatives for accommodating future growth were considered. All these options prioritised brownfield development but reflected different ways of providing the necessary additional greenfield development. Option 7 to promote further development to the rural settlements west of the River Severn would protect Green Belt but would not be sustainable as there is limited employment in this area and most villages have limited facilities. Residents would be dependent upon services and employment in the larger towns adding to congestion in those town centres and at the few river crossing points.
- 3.3.4 Analysis of available sites has shown that even if a lower requirement figure of 248 (based on the Standard Method) is used, this would still require the release of Green Belt sites as there are insufficient previously developed and urban greenfield sites which are deliverable. In total, including those sites already completed, under construction and committed (at 1<sup>st</sup> April 2019), the Local Plan allocates 49% of housing on brownfield sites, including on brownfield sites within the Green Belt. The remainder comprises greenfield land outside of the Green Belt (7%) and Green Belt greenfield land (44%).

- 3.3.5 Thus the Council concludes that the spatial development strategy would still require the release of Green Belt land even if a lower housing requirement figure were used. Brownfield urban sites are increasingly difficult to bring forward with site viability being a real issue. Duty to Cooperate Statements with neighbouring authorities in the Black Country show that meetings have been held to discuss the shortfall in housing provision facing these authorities. However, no justification has been provided to Wyre Forest District Council to justify why these areas should be looking to Wyre Forest District to accommodate some of the shortfall. Wyre Forest does not form part of their Housing Market Area.
- 3.3.6 Wyre Forest District Council (WFDC) appointed Nathaniel Lichfield & Partners (Lichfields) to undertake an Employment Land Review (ELR) which was produced in 2016; it was updated in 2018 (ECON04). An assessment of the Green Belt was also undertaken (GB01, GB02, ED20).
- 3.3.7 The ELR was required to ensure that sufficient suitable employment sites are provided to accommodate the scale of economic growth projected for the District over the plan period. Sites have been assessed through the Housing and Economic Land Availability Assessment (HELAA) (HOU04) to ensure that sites are suitable, available and achievable for economic development over the Local Plan period. The ELR considered the existing situation, assessed future employment land requirements and analysed existing employment sites and the need for any additional sites to address the gap between demand and supply.
- 3.3.8 The ELR Update was prepared in the context of requirements set out in the revised National Planning Policy Framework (the Framework) published in July 2018 and the Planning Practice Guidance (Practice Guidance) with regards to planning for economic development needs to ensure that it was consistent with national policy and to facilitate the delivery of employment sites. Both quantitative and qualitative methods were used to assess the need for, and supply of, employment land. This involved analysis of economic, demographic and commercial property market data and consultation with a range of stakeholders.
- 3.3.9 The ELR followed the approach outlined in the PPG and modelled five future employment land growth scenarios:
1. Projections of employment growth in the main B-Class sectors (labour demand) derived from economic forecasts produced by Experian in June 2018. The first scenario comprised a baseline projection from Experian which was predicated on a net job growth of 1,100 over the period 2016-36 in Wyre Forest District. The second, policy-on or 'regeneration' scenario involved testing whether there were concrete

policy justifications for accelerating growth in certain industrial sectors. These key growth sectors were derived from discussions with WFDC Officers and the LEP Target Growth Sectors for both LEPs that Wyre Forest falls within (Worcestershire LEP and GBSLEP).

2. Consideration of past trends in completions of employment space based on monitoring data collected by WFDC, and how these trends might change in the future; and,
3. Estimating future growth of local labour supply based on the latest housing requirements contained in Wyre Forest District Housing Need Study 2018 (HOU01), and the amount of jobs and employment space that this could support, based on the Housing Need Assessment's two main demographic model runs (SNPP-2016 and dwelling-led LHN, both of which are essentially predicated on a dwelling target of 276 dwellings per annum).

3.3.10 Based on the alternative scenarios modelled, the ELR considered a range of factors to inform a judgment on the appropriate level of need and these are set out in paragraphs 7.74-7.76 of the ELR. Balancing these considerations, the ELR recommended that Wyre Forest District's B-Class employment land OAN was 29 ha up to 2036. This equates to the Labour Supply (Dwelling-Led) scenario, which itself aligns with the Council's housing LHN. It also sits broadly in the middle of a wider range between Scenario 3 (SNPP-2016), at 26 ha at the lower end, and Scenario 5 (Past Take-Up Rates) at 31 ha at the upper end.

3.3.11 The assessed employment need is approximately 29 ha; however, the Submission Plan allocates 35.21 ha. This is because the NPPF requires that Planning policies should "*be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances*" (paragraph 81 d). The Council considered that an additional uplift to the overall supply was necessary to be consistent with national policy. The Council also considered that an over allocation would build in a buffer to provide some flexibility for the possible non-delivery of some employment sites.

3.3.12 Changes to the Use Class Order 2020 mean that existing light industrial employment sites within the District may, without the need for planning permission change the use to other uses within Class E. An over allocation of allocated employment sites may offset any loss of employment sites to other uses. The employment allocation is justified and positively prepared, the requirement had considered different scenarios and evidence and provided a strategy to meet the District's employment needs.

### **Q3.4 Should a housing requirement figure for each of the designated neighbourhood plan areas be set out in the Plan?**

- 3.4.1 The Housing Topic Paper (ED3) at section 7 discusses the issue of housing allocations and neighbourhood plans. The submission Local Plan allocates enough sites to meet the housing needs for Wyre Forest District as a whole. Current Neighbourhood Plan coverage is very limited in Wyre Forest District with only 5 designated areas and 2 made plans. The Local Plan as submitted is flexible and further housing could be delivered through future Neighbourhood Plans. Para.7.3 of ED3 refers to the 5 Designated Neighbourhood Areas. All are either washed over Green Belt in their entirety (Chaddesley Corbett and Upper Arley) or are surrounded by the Green Belt. The hamlet of Caunsall is also washed over Green Belt.
- 3.4.2 Appendix 2 of ED3 analyses the key findings of the housing needs surveys undertaken as part of the evidence base underpinning the Neighbourhood Plans and compares the housing requirement figures with housing completions and approvals together with the proposed Local Plan allocations (including those for Reserved Housing Sites). It should be noted that Cookley and Caunsall Neighbourhood Plan Area only covers the eastern part of the parish of Wolverley and Cookley. Of the 4 proposed Reserved Housing Sites in the Parish, only 2 are located within the Neighbourhood Plan Designation – Lawnswood and Kimberlee Avenue.
- 3.4.3 The largest allocation is at Blakedown where there is a mixed-use proposal for housing and rail station parking. Analysis shows that this proposal can meet the local need as shown in the parish survey. This analysis shows that the proposed allocations within the designated Neighbourhood Plan Areas are justified by the requirements shown in the housing needs surveys undertaken within those areas. To allocate a specific housing requirement to each area through the Local Plan process would not be expedient.
- 3.4.4 The Council considers that the Plan as submitted is effective in ensuring that identified needs for housing in Wyre Forest District are met. There is therefore no requirement for Neighbourhood Plans to identify opportunities for additional housing development, although they could do so if they wished, as this would be consistent with Policy 6A which makes clear that the housing requirement is a minimum figure. In this context, the Council concludes that there is no need for the Plan to set out a housing requirement for any of the designated neighbourhood plan areas as referred to in the NPPF (paras. 65 & 66).
- 3.4.5 If the Planning Inspector is minded to do so, the Council can amend the text for Policy 6A to consent to providing an indicative figure for

Neighbourhood Areas if requested to do so. This figure would be based on the latest evidence of local need and the Plan's spatial development strategy and allocations. This approach would then give Neighbourhood Plan Areas the flexibility to decide whether they wished to provide additional housing development to that proposed in the Plan.