

Matter 4 – Dr Peter King

Q4.1 (i) *Is the site's allocation for a new village and the proposed indicative quantity and mix of development justified by the evidence?* (ii) *Is the allocation appropriate, compared with the reasonable alternatives?*

In Matters 2 and 3 CPRE Worcestershire set out its views on housing need and supply. The need for housing at this location is not justified beyond the existing permission as there are reasonable alternatives, which include an appropriate windfall allowance, additional examination of density of development and exploration of further opportunities in town centres, including Kidderminster, as well as sufficient alternative sites in the Green Belt which are more acceptable.

We consider the location inappropriate due to the landscape impacts of both the eastern and western extensions. The core is a brownfield site and those who established the hospital, many years ago, were careful to select a site between several woods and to plant shelter belts of conifers to hide the fact that this was a developed site in the midst of the Green Belt.

- The lie of the ground means that there is no feasible means of shielding the western extension.
- The eastern extension could be shielded by planting trees, but development should not start until a new shelter belt has been planted and reached a height of (say) 7 metres.
- The northern extension will only be visible from Axborough Lane (which is not much used) and distantly from Beechtree Lane.

This is also a significant intrusion into the Green Belt. The release of an ADR (site BW/4) and the development of the Lea Castle core together mean that development will stretch continuously from Kidderminster to Cookley with two short gaps of a mere couple of hundred metres each. This is contrary to the Green Belt principles of preventing sprawl and keeping settlements apart.

Q4.2 *Are there exceptional circumstances that justify the proposed changes to the Green Belt boundary in this location?*

As set out above, we do not believe there are exceptional circumstances for the release of housing because there are no clear strategic goals set out in the plan. The justification seems only to be to meet the housing requirement set out by the Council and as we set out in Matter 2 and 3, that is exaggerated when following the Government's Standard Methodology and inconsistent with the position set out in the Five-Year Land Supply.

We consider the appropriate place for housing for Kidderminster's needs to be in or near Kidderminster. Nevertheless, WFDC cannot be justified in allocating more land than it needs. As it is not in the Birmingham and Black Country Housing Market Area, it is not obliged to provide housing for them. These matters have been explored at length under preceding matters.

We consider that the plan allocates almost enough land for housing within urban areas, including former school sites, which may currently be within the Green Belt. If this still leaves a deficit, that might be met by one or other of the proposed sites that is less damaging to the countryside, its landscape, and its openness. Alternatively, some infill might be allowable in the village of Stone, by providing it with a village envelope.

If any part of the extensions is allocated, it should be provided that its use should be towards the end of the plan period, in accordance with the principle of "brownfield first".

Q4.3 *How will the development contribute to compensatory improvements to the Green Belt?*

No measures seem to be offered for compensatory improvements to the Green Belt. We do not think that it is appropriate to allocate a compensatory area as Green Belt. That would inevitably have to be west of the river Severn, but we consider the river to be the most robust boundary for the Green Belt. It is up to WFDC and the developers to propose appropriate compensatory improvements, but it is not obvious to us what these would be. They would inevitably have to be off-site, which probably means that a developer would not own the land necessary to deliver them.

Q4.4 No comment.

Q4.5 *Is the proposed provision for affordable housing on the site justified and deliverable?*
This is merely the general requirement for the whole district. We consider that target to be too low. We deal with this subject in detail under Matter 7.

Q4.6 No comment.

Q4.7 *Should provision be made for Gypsy and Traveller accommodation on the site, subject to identified need?*

Gypsy and Traveller accommodation ought to be allocated on the same principles as for the settled community, but preferably not concentrated in one part of the district. We have no particular view where this should be provided.

Q4.8 *With reference to Table 10.0.1 of the Plan, is it proposed to develop 2 separate parcels of land within Lea Castle Village for employment purposes and if so, is this sound?*

We set out in Matter 2 why we are opposed to employment on this site. However, if there is to be employment land it should be for offices, rather than industrial or warehouse development which will generate more larger HGV traffic. A451 is a relatively quiet road, but its access to the Strategic Highway network is poor. Traffic (see appended sketch map) from the site would need either to use:

- Hurcott Lane, which is narrow and wholly unsuited to HGV traffic, passing over a dam in respect of which there were once safety concerns or
- Stakenbridge Lane, which passes under an arched railway with a sharp turn beyond the bridge, making it unsuitable for HGV traffic, though suitable for lighter trucks. Immediately before the railway, it passes over the dam of Stakenbridge Pool, the dam being hundreds of years old and probably not built to take HGVs.

In both cases, traffic would feed into the most congested section of A456 (see appended sketch map). In the case of Stakenbridge Lane, this would be at a junction where there is a record of a significant number of accidents.

From the highway point of view, CPRE (but not Hagley PC) consider that it might be better for the Green Belt employment site to be part of site OC/5 and OC/6, as these have much better access to A456; that is if an employment site in the Green Belt is in fact necessary.

We apologise for the quality of the sketch map, but lack the copyright licence to produce something better.

Q4.9 *Do the recently implemented changes to the Use Classes Order in respect of employment and retail uses indicate that any modifications should be made to the policy requirements for this allocation?*

The employment use is limited to B1 with conversion to B8 (other than plain storage) prohibited for the highway reasons (outlined by Hagley Parish Council under Matter 1).

Q4.10 (i) *What is the status of the Concept Plan in Appendix B of the Plan and how should its relationship with the vision in Policy 31.1 and development principles in Policy 31.2 be clarified?* (ii) *Should these policies be re-ordered and amended for clarity and effectiveness?*

We hope this will not be implemented at all. If it is, the development should be deferred until new shelter belts have been planted and have reached a height of (say) 7m.

The plan shows a series of entrances off main roads. This would have the undesirable effect of urbanising a significant amount of Green Belt countryside. The original purpose of Green Belt was for preventing ribbon development along main roads. This goes back to 1930s legislation, even before the Green Belt was formalised as such, promoted both by CPRE and by motoring organisations, such as Automobile Association, which wanted open roads.

A449 is a trunk road (or former on) and has had a reputation for having fatal accidents. It is an extremely busy road. Accordingly, multiple entrances off A449 ought to be unacceptable. It has a 60-mph limit road, where a speed of 50 mph is likely to be common. It is not (and should not become) an urban road where only a limit of 30 mph would be appropriate. A451 would currently be safe at 70 mph and used regularly to be used at 60 mph. For reasons not clear to us, an inappropriately low speed limit of 50 mph has been imposed. Axborough Lane is merely a lane. It would be appropriate for an emergency (and pedestrian and cycle) access, nothing more.

Q4.11 (i) and (ii) No comment.

Q4.11 (iii) *How will any adverse traffic impact be mitigated?*

1. We can do no more than repeat the objection made by Hagley Parish Council under Matter 1. It is out view that no mitigation is offered or provided and therefore the development should not proceed. This objection is fully detailed in our response to Matter 11. We include here a short summary of these objections:
2. Specifically, Hagley suffers from a major congestion issue on the A456, A450 and A491 roads that run through Hagley. The A456 and A491 have been proposed for inclusion in the government's proposed Major Road Network which is aimed to complement the Strategic Road Network as roads which carry a high proportion of traffic with a national economic significance. These roads through Hagley are already running close to (or at certain junctions above) capacity with consequent problems of congestion, air quality, and safety. In particular, the A456/A450 junction at Cross Keys, the A456/B4187/Western Road/Summervale Road junction, and the A456/A491 junctions at the Hagley Island and at the Cattle Market are severely congested in both the morning and evening peaks. Outside of Hagley the Hayley Green Roundabout and the Grange Roundabout in Halesowen, both on the A456 towards Birmingham, show similar congestion. The local highway network is shown in the Transport Demand in the Hagley Area report (TDHA)¹ – Para 1.3
3. The A456 carried 31,852 vehicles in a day in 2011 (Annual Average Daily Traffic – AADT, taken from TDHA) and this can only be expected to have increased since then.
4. The WFLP proposes major developments at Lea Castle and the Kidderminster Eastern extension and many of the new residents can be expected to commute to Birmingham

¹

http://www.worcestershire.gov.uk/download/downloads/id/12238/transport_demand_in_the_hagley_area_january_2020.pdf

or the Black Country generating more traffic on these roads (and the A456 and A450 in particular) making the existing problems worse.

5. Furthermore, these developments are part of an overall Plan which proposes a housing target in excess of the Objectively Assessed need (see responses to Matter 2 and 3).
6. BDC has raised these issues with WFDC and despite considerable discussion there has been no resolution. The Statement of Common Ground between WFDC and BDC sets out specific areas of disagreement (Document SD-10b). Hagley supports BDC in its stance. Hagley has sought to engage with WFDC and has, on various occasions, sought meetings; these approaches have not had any positive response from WFDC.
7. Please refer to HPC's response on Matter 11 for a fully explanation of our objection.

Q4.12 *(i) Overall, are the detailed policy requirements clear, consistent, justified and deliverable? (ii) Will they guide the creation of a village with high quality buildings and places that relates well to its surroundings and nearby settlements, promotes safe and healthy communities, and conserves and enhances the natural and historic environment?*

It is desirable that there should be a village centre at the core of the development, within easy walking distance of all houses, but we fear that decisions already taken as part of planning approval for the former hospital site may have already rendered that impossible.

We see no prospect of this new village having any useful or meaningful relationship to Cookley, despite their edges being a mere couple of hundred metres apart. This is another reason why the expansion of Lea Castle beyond the Brownfield part is completely inappropriate.