

## **Matter 5 – Dr Peter King**

Note that the answers given, except Q5.1, 5.8 and 5.9, are essentially identical to those given for Matter 4.

**Q5.1** (i) *Are the proposed allocations for the 4 sites that comprise the Eastern Extension, including the indicative quantity and mix of development, justified by the evidence?* (ii) *Is there a clear rationale for their allocation as a whole and is it 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.

It has direct access onto the A456 and the problems of congestion on this road has been described by Hagley Parish Council under Matter 1, and are more fully covered by Hagley PC's response to Matter 11. In the immediate area the road mostly runs freely but it is heavily congested at Hagley and on Manor Way (south of Halesowen) at peak times. Nevertheless, it provides the best access to the Strategic Highway network. A448 suffers from the disadvantage that Bromsgrove has no eastern bypass, so that access to the Strategic Highway network is through the Bromsgrove town centre, making the A456 the more obvious choice of route. Access to M5 southbound is also available at M5 J6 via A449.

We would however question how suitable the whole of this land is for development, when the O.S. 1:25,000 map shows some of it with a symbol for marsh, along a minor brook, joining Bell Brook below Heath Mill. This is also reflected in the farm name of Offmoor: a moor is wet ground, but less so than marsh:

*Mor 'moor, upland waste' is common in placenames. The usual meaning is 'fen'. [It then refers to upland waste, e.g. Dartmoor] – E. Ekwall, Concise Oxford Dictionary of English Placenames (4<sup>th</sup> edn, 1960; repr. 1977), p. 330.*

**Q5.2** *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.

**Q5.3** *Will the overall development provide for adequate 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.

**Q5.4** No comment.

**Q5.5** *Should specific provisions for affordable housing on the Eastern Extension sites be set out in the policies?*

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.

**Q5.6** No comment.

**Q5.7** *Should provision be made for Gypsy and Traveller accommodation within the overall allocation, 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.

**Q5.8** *(i) What is the status of the Development Framework Plan in Appendix B and how should its relationship with the vision in Policy 32.3 and principles of development in Policy 32.4 be clarified? (ii) Should these policies be re-ordered and amended for clarity and effectiveness?*

If further industrial land is required due to our objection to its inclusion at Lea Castle, CPRE considers that land between Offmoor Farm and A456 would be suitable, as it would have good transport links to the Strategic Highway network (save at peak times). Hagley PC does not agree.

Part of the development is designated as “mixed use” (which could cover anything): this would be better expressed as “housing with school and local centre” to make the plan’s intentions clear.

**Q5.9** (i) and (ii) No comment.

**Q5.9** *(iii) How will any adverse traffic impacts of the development be mitigated?*

We can do no more than repeat the objection made by Hagley Parish Council under Matter 1. It is our view that no mitigation is offered or provided and therefore the development should not proceed. Our objection is explained at length under Matter 11. We have included here a short summary of our objection (which is the same as for Matter 4 – Lea Castle):

Specifically, Hagley suffers from a major congestion issue on the A456, A450 and A491 roads that run through Hagley (see appended sketch map). 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 Cala Development 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)<sup>1</sup> – Para 1.3

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.

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

Furthermore, these developments are part of an overall Plan which proposes a housing target in excess of the Objectively Assessed need (see our responses to Matter 2 and 3).

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.

Please refer to our response to Matter 11 for more detail of our objection.

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

**Q5.10** It is desirable that there should be a village centre at the core of the development, within easy walking distance of all houses.

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[http://www.worcestershire.gov.uk/download/downloads/id/12238/transport\\_demand\\_in\\_the\\_hagley\\_area\\_january\\_2020.pdf](http://www.worcestershire.gov.uk/download/downloads/id/12238/transport_demand_in_the_hagley_area_january_2020.pdf)