

Taylor Wimpey UK Ltd

ID: 536839



MATTER 5: KIDDERMINSTER EASTERN EXTENSION (POLICIES 32, 32.1-32.4 AND SUPPORTING TEXT)



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DESIGN **ENVIRONMENT** **PLANNING** **ECONOMICS** **HERITAGE**

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5.1 (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?

5.1.1 The Concept Plan, contained within the submitted Local Plan [SD01] at Appendix B, has been developed in collaboration with officers at WFDC and a range of other key stakeholders. This Plan has evolved through the plan-making process and has been informed by the evidence base prepared as part of the Local Plan Review and a range of further technical assessments prepared on behalf of Taylor Wimpey UK Ltd (TW). The Concept Plan identifies a deliverable quantum of housing development for OC/6 and OC/13N and supporting infrastructure having regard to identified constraints, opportunities and community needs.

5.1.2 The smaller sites of OC/5 and OC/12 can be delivered independently.

(ii) Is there a clear rationale for their allocation as a whole and is it appropriate, compared with the reasonable alternatives?

5.1.3 The Sites Selection Paper August 2019 [SSP01] brings together a number of key strands of the Council's evidence base that has been utilised to determine the most appropriate allocations, having regard to reasonable alternatives.

5.1.4 This evidence provides clear conclusions that the continuation of a brownfield-led strategy would not yield sufficient deliverable/developable land to support the delivery of the identified housing requirement. It also demonstrates that brownfield sites within Kidderminster would not deliver sufficient growth to meet the needs arising within the town.

5.1.5 The Council considered a number of growth options through an Issues and Options consultation, including Option 3 (Brownfield regeneration focused on main towns plus expansion of Kidderminster to SE via sustainable urban extension). This was deemed a sustainable option with Options 2 and 3 providing the most sustainable greenfield locations within Wyre Forest District [LPP06], including land within the proposed Kidderminster Eastern Extension.

5.1.6 The Council has provided consideration of all site options and clear reasons why reasonable alternatives sites have not been allocated [SSP01a] and reasons why

many parts of the District would not be suitable for further large-scale development **[SD04/SSP01]**.

5.2 Are there exceptional circumstances that justify the proposed changes to the Green Belt boundary in this location?

5.2.1 The Green Belt Topic Paper **[ED20]** and its associated technical notes set out the exceptional circumstances which justify the proposed changes to the Green Belt at this location.

5.2.2 A significant proportion (57%) of the District lies within the West Midlands Green Belt.

5.2.3 Development needs within the District and the finite supply of viable brownfield land available result in a need to locate development beyond existing settlement boundaries.

5.2.4 Kidderminster, the main town and most sustainable settlement within the District, is inset within the Green Belt and therefore no non-Green Belt options exist beyond the existing urban area. The SA and other evidence produced by the Council determines that growth to the north and east of Kidderminster represents the most sustainable distribution of growth outside existing urban area of the town.

5.2.5 In conclusion, the exceptional circumstances that justify releasing this parcel of land comprise: the growth requirements determined for the District within the plan period and beyond; the lack of available sites within the existing urban areas; and the conclusions of the Council's evidence that has been utilised to determine a sustainable spatial distribution of growth, including a focus on growth to the most sustainable settlement within the District.

5.2.6 The Green Belt Review **[GB01]** considers that land to the north and east of the town make a more limited contribution to Green Belt purposes than land to the south and west of Kidderminster. The site lies within Parcel E1.

5.2.7 The Green Belt Review Part II **[GB02]** recognises that the site "*is reasonably well contained, largely sitting within a hollow and exposed on its southern extent adjacent to the A448.*" The Green Belt Review Part II recognises "*the establishment of significant outer boundary as part of strategic masterplanning would help to temper this effect.*"

5.2.8 Through strategic masterplanning, the Concept Plan demonstrates how a sensitive new relationship between town and country can be achieved to check the unrestricted sprawl of Kidderminster into open countryside beyond. This is achieved through the provision of a 30m wide green buffer along the eastern boundary to create a clear and defined new Green Belt boundary and a significant offset from Comberton Road and the Hoo Brook within the south east corner of the site as part of the site wide Green Infrastructure strategy.

5.2.9 The proposed new Green Belt boundary has been informed by a number of factors set out within a Landscape and Visual Appraisal submitted by TW at Regulation 19 stage. This demonstrates that together, the existing landscape components and the emerging proposals present an opportunity to redefine the Green Belt edge, using defined physical features of the landscape that will be robust and enduring.

5.3 Will the overall development provide for adequate compensatory improvements to the Green Belt?

5.3.1 The Council's approach to Green Belt compensatory improvements is set out in the Green Belt Topic Paper **[ED20 Chapter 9]**. This strategic approach to compensatory improvements is supported by TW.

5.3.2 The Kidderminster Eastern Extension complements this strategic approach. At present the opportunities for existing residents to access to the countryside between Comberton Road and Birmingham Road are restricted to a single PRow which links Kidderminster with a wider network of paths around Harvington. The proposed Kidderminster Eastern Extension proposes a comprehensive network of green infrastructure (approximately 50% of the OC/6 and OC/13N) linking the whole of the eastern edge of Kidderminster to the PRow network, including the provision of direct links to the long-distance Monarchs Way.

5.3.3 As part of the green infrastructure network provided, approximately 12 hectares will be retained within the West Midlands Green Belt. New green infrastructure will provide new walking and cycling routes providing new recreational access to the Green Belt.

5.3.4 The proposal will provide a net gain in biodiversity, including opportunities for new woodland planting and the creation of neutral grassland habitat within the green infrastructure network retained within the Green Belt.

5.3.5 This development proposal offers the opportunity to provide extensive public access to the countryside where there is currently limited access. In addition, the extensive green infrastructure provision will result in a net gain to biodiversity including opportunity for habitat creation (including woodland and neutral grassland) which will provide improved habitat connectivity. Therefore, it can be demonstrated that the proposed allocation would assist in providing adequate compensatory improvements to the Green Belt.

5.4 (i) What is the basis for expecting that around 1,440 dwellings will be delivered in the Eastern Extension by 2036?

5.4.1 OC/6 and OC/13N are under the control of TW. These two sites can deliver approximately 1,400 dwellings of the 1,440 identified for the Eastern Extension.

5.4.2 It is the intention of TW to submit a hybrid application in early 2021 following significant pre-application discussions with officers at WFDC and a range of key stakeholders including WCC Highways/Education/Heritage/Ecology, NHS South Worcestershire, Sport England and Worcestershire Wildlife Trust, undertaken to date.

5.4.3 A screening opinion (19/0411/EIASO) and scoping opinion (20/0228/SCO) have been undertaken and technical work to support the hybrid application is currently being finalised. A start on site will be determined by the timescales associated with the adoption of the emerging Local Plan and subsequent determination of the planning application.

5.4.4 The site will be delivered in phases, with the first phase located off Comberton Road. The first phase will include land for the community hub to include a new primary school and other community facilities. A second phase will commence off Husum Way and will deliver dwellings concurrently with phase 1.

5.4.5 TW has provided a trajectory for both OC/6 and OC/13N, which are in two family ownerships. It is considered realistic that 1,400 homes will be delivered within the plan period utilising a cautious delivery rate of 100 dwellings per annum from two sales outlets. This aligns with national evidence, including Lichfield's Start to Finish report (Second Edition Feb 2020) which concludes an average delivery rate of 107 dpa on sites of this size.

(ii) Are there infrastructure requirements, funding arrangements, phasing or other factors that may affect the timescale for the development and that should be addressed in the Plan?

5.4.6 The Infrastructure Delivery Plan **[IFT01]** and the Financial Viability Assessment (FVA) in relation to Kidderminster Eastern Extension April 2020 **[ED9A]** provide consideration of the infrastructure requirements to support the site. However, despite the evidence supplied to support the individual items the calculations behind the source of the figures utilised are not fully understood at this stage. It may be that there is a significant contingency within these costs that will be refined as an option or detailed scheme is worked up in order to address these needs, which will have a positive impact on the viability of the scheme. We suspect that this may be the case as the IDP notes **[IFT01 Page 91]**.

5.4.7 In some cases figures have been included which represent maximum figures rather than minimum figures. This applies to both the IDP and the Viability Study and every effort has been made to achieve consistency between the two parts of the technical evidence base. It is recognised that infrastructure costs will be refined in time.

5.4.8 In this case, it may be more appropriate to consider the viability at the decision taking stage, which is in line with the PPG **[PPG ID: 10-007]**.

5.4.9 The timing of infrastructure provision has been discussed with officers at WFDC and key infrastructure providers. The TW Concept Plan provides a community hub that can be delivered early in the construction of the Eastern Extension, to ensure the provision of a new primary school which needs to be fully operational by the time the 300th to 500th dwelling is occupied. This also provides opportunity to deliver a new doctor's surgery in the short term. The early delivery of these items is crucial to the place-making of the scheme. TW is committed to working with WFDC and WCC in respect of funding arrangements and to consider appropriate triggers for necessary obligations.

5.5 Should specific provisions for affordable housing on the Eastern Extension sites be set out in the policies?

5.5.1 TW considers it necessary for specific provisions for affordable housing to be set out within the policies. This is necessary to provide consistency with policies relating to Lea Castle and to reflect evidence contained within the Kidderminster East FVA **[ED9A]**.

- 5.5.2 A SoCG **[SD10n]** reflects that based upon current identified developer contributions (of c.29m) identified within the latest IDP, emerging policy requirements and current appraisal assumptions it is agreed that the site can support the delivery of 15% affordable housing.
- 5.5.3 However, we consider that some of these costs are likely to be overly cautious and reflect the worst-case scenario. As stated above, and compliant with the PPG, it is agreed that further technical evidence and the outcome of further work with stakeholders should inform a final calculation of affordable housing through the development management process, to be based on:
- a) Appropriate technical and costing evidence (presented at the time); and
 - b) The ultimately agreed S106 payments
- 5.5.4 As set out in the Kidderminster East FVA **[ED9A para. 5.53]** the final calculation would be such that such that, for example:
- If the S106 payment requirements were to reduce from the current anticipated c. £29 million, then the affordable housing contribution would increase, from 15% to no more than 25% of all dwellings
 - If the requirement for abnormal foundations is confirmed as beyond the 30% of plots, then the affordable housing contribution would reduce, reflecting the additional cost, but adjusting to no less than 10% affordable housing.
- 5.5.5 This can be reviewed as the project meets key milestones to maximise the provision of affordable housing that can be delivered viably across the site. The PPG supports this approach where further information on infrastructure or site costs is required **[PPG ID: 10-007]** and sets out that there should be a clear agreement on achieving policy compliance over time **[ID: 10-009]**.
- 5.5.6 This approach is supported by TW, as set out in the SoCG **[ST10n]** and consider it necessary to reflect these conclusions within policy. The Policy should identify an affordable requirement of between 10% and 25% to be determined through the development management process and reviewed at key milestones (phases) of the development.

5.6 (i) How will any competing demands on funding for affordable housing, infrastructure and various facilities be resolved?

5.6.1 It is noted the Council has considered funding priorities through a recent Cabinet report **[ED13]**. This will provide a starting point for considering competing demands.

5.6.2 As set out in the SoCG **[SD10n]** TW and WFDC are committed to working with WCC and other stakeholders to explore alternative funding opportunities aligned to the strategic infrastructure identified/affordable housing requirement and to ascertain the scale of the appropriate developer contributions having regard to CIL Regulations 122, progressing 'best estimates' contained within the current IDP to firm up costs. This will inform the Heads of Terms submitted alongside a hybrid planning application.

5.6.3 In addition, site wide infrastructure costs (including abnormals) will continue to be refined through the production of detailed engineering and cost evidence produced by TW as part of the development management process.

(ii) Overall, are the proposed allocations viable?

5.6.4 A Financial Viability Assessment (FVA) has been prepared in relation to Kidderminster Eastern Extension **[ED9A]**. The FVA recognises the very large estimated S106 requirement of over £29m (almost £21,000 per dwelling) associated with the site, including the significant off-site highway/transport enabling element accounting for £13m (c. £9,300 per dwelling) of this total (for which detailed assumptions are not known).

5.6.5 The FVA concludes that based on a S106 estimate of over £29m, and current appraisal assumptions, the site could support the delivery of 15% affordable housing. However, it also concludes that if the S106 payment requirements were to reduce then the affordable housing contribution could increase, up to the policy requirement of 25%.

5.6.6 The S106 requirements are set out within the IDP **[IFT01]** which is a living document that will be updated and refined as further work is undertaken. WFDC has stated that these infrastructure costs represent the 'worst case scenario,' although the costings behind these assumptions have not been scrutinised by TW.

5.6.7 TW has questioned whether these identified costs are accurate or whether they are overly cautious estimates heavily weighted by optimism bias. It is also not clear which

elements of transport infrastructure relate to allocated sites and whether these costs have been artificially loaded upon the strategic allocations. This appears to be particularly the case in respect of the transport projects identified and the contribution sought from the Kidderminster Eastern Extension.

5.6.8 Table 3A of the IDP **[IFT01]** identifies a number of strategic infrastructure costs, including potential funding sources against each cost. A variety of funding sources are identified, aside from developer contributions, however, it appears the costs of all infrastructure are to be borne by the development industry which is wholly unrealistic. This results in an unrealistic scenario rather than a worst-case scenario. In respect of the strategic transport infrastructure costs there are a range of opportunities, including through HIF and Pinch Point Funding to deliver many of the identified projects.

5.6.9 As set out above, the Policy should identify an affordable requirement of between 10% and 25% for Kidderminster Eastern Extension, to be determined through the development management process and reviewed at key milestones (phases) of the development, in line with the PPG **[PPG ID: 10-007 and 10-009]**.

5.7 Should provision be made for Gypsy and Traveller accommodation within the overall allocation, subject to identified need?

5.7.1 TW does not consider the evidence in respect of Gypsy and Traveller accommodation justifies provision within the Kidderminster Eastern Extension. The Wyre Forest GTAA **[ED15]** concludes that there are no unmet needs in respect of permanent Gypsy and Traveller pitches and the needs for meeting permanent Travelling Showpersons will be met through a proposed allocation. In respect of transit site/stop over requirements, the GTAA identifies a range of alternative solutions to meet needs which would not justify provision within an identified urban extension to the East of Kidderminster.

5.8 (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?

5.8.1 The Development Framework/Concept Plan contained within Appendix B has been prepared by TW to illustrate how OC/6 and OC/13N can be developed, having regard to the vision and principles of development contained within Policies 32.3 and 32.4.

5.8.2 The Plan has evolved through the plan-making process to date and has been informed by evidence and collaborative discussions with officers at WFDC and other key stakeholders.

5.8.3 If the plan is referenced within Policy an element of flexibility is requested to allow for any future evolution of the proposals.

(ii) Should these policies be re-ordered and amended for clarity and effectiveness?

5.8.4 TW considers the vision and principles of development are clear as set out in Policies 32.3 and 32.4.

5.9 (i) Does the policy framework provide clearly and comprehensively for sustainable transport choices and connectivity within and beyond the urban extension?

(ii) How will the development be integrated into the public transport network?

(iii) How will any adverse traffic impacts of the development be mitigated?

5.9.1 The development site is located on the periphery of Kidderminster's eastern fringe, and as such there are ample and good opportunities for the site to connect well with all of the mobility networks, including walking, cycling, public transport and road, providing access by a choice of means of transport to day to day facilities and beyond.

5.9.2 Sustainable transport will be proposed to be at the heart of the development through the creation of choice, which is a fundamental feature in encouraging people to make use of sustainable modes of transport. The proposed development will be designed to provide a vibrant, active and healthy community which is built around green routes, footways and cycleways to encourage sustainable travel. The proposed pedestrian and cycle routes will permeate out into the surrounding area with the creation of new pedestrian and cycle facilities, which will connect to existing routes linking the site to nearby destinations.

5.9.3 In addition, the proposed development will be well served by the improvement/creation of a bus route linking the site to Kidderminster town centre and other local destinations. The proposed service will offer a quick and direct service

providing an attractive alternative to the private car and linking the site to the employment, retail, leisure and transport opportunities in the town centre. The feasibility of providing a demand responsive bus service, which allows users to call on waiting vehicles to pick them up and drop them off at the click of a button, to serve the development and the neighbouring areas will also be investigated.

5.9.4 Education trips represent approximately 40-50% of trips in the morning peak. The proposals include a primary school on site; therefore, the majority of primary education trips will be contained within the site. This will reduce the overall volume of traffic generated by the proposed site. We will work collaboratively with Worcestershire County Council to understand the likely traffic effects of the development. Extensive discussion with Worcestershire County Council have already been undertaken to agree the parameters of a traffic assessment. If highways improvements are required to mitigate the impact of the proposed site, further discussions with Worcestershire County Council will be undertaken to agree the design and package of improvements

5.10 (i) Overall, are the detailed policy requirements clear, consistent, justified and deliverable?

(ii) Will they guide the creation of a major urban extension with high quality buildings and places that relates well to its surroundings and the adjoining built-up area, promotes healthy and safe communities, and conserves and enhances the natural and historic environment?

5.10.1 TW considers the detailed policy requirements for Kidderminster Eastern Extension to be clear, consistent, justified and deliverable. The specific requirements have been informed by the Council's evidence base and supported by further technical appraisals undertaken by TW. The Concept Plan demonstrates how the vision and development principles can be delivered through OC/6 and OC/13N, including 1,400 homes, community facilities and a comprehensive green infrastructure network, that relate well to its surroundings promotes healthy and safe communities, and conserves and enhances the natural and historic environment.