



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

Examination

Matter 5: Kidderminster Eastern Extension
(Policies 32, 32.1-32.4 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 5: Kidderminster Eastern Extension (*Policies 32, 32.1-32.4 and supporting text*)

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?

- 5.1.1 The Council is of the opinion that the proposed allocations across the 4 sites forming the Kidderminster Eastern Extension are justified by the evidence.
- 5.1.2 All of these sites were submitted via the Call for Sites at the start of the Local Plan Review except for OC/6. This northern site was initially suggested by officers as part of the Preferred Options consultation. In response, Taylor Wimpey submitted plans showing that they also had control of this northern land parcel and this would then allow a second access onto their site. Following the submission of an additional parcel to the east of OC/6 and OC/13N at Preferred Options stage (WFR/ST/10), Taylor Wimpey have been able to slightly amend the site boundary to the rear of Offmore Farm where access over the stream was very tight by agreeing an option on a small part of this additional land.
- 5.1.3 Site OC/12 is a small site fronting the A448 in private ownership. It was formerly a plant nursery and has more recently been used by a landscaping business. The Spennells Housing Estate lies on the opposite side of the A448 and there are residential buildings on both sides of the site. The site is constrained by the Hoobrook and its associated flood zones together with existing woodland on the site. Evidence base studies have concluded that the site is suitable for limited development and the allocation is for 10 dwellings. Access will be using the existing one onto the A448.
- 5.1.4 Site OC/5 is in a separate ownership. Part of this site may be required for junction improvements with the A456. A very low-density development with extensive landscaping is proposed for this gateway site. Any development must respect the rural setting of the adjacent Hodge Hill Farm Barns complex.

Q5.1 (ii) Is there a clear rationale for their allocation as a whole and is it appropriate, compared with the reasonable alternatives?

- 5.1.5 Since 2010 most development in Wyre Forest District has been on brownfield land and the Council wish to continue with this brownfield-led strategy. However, the capacity of the remaining brownfield sites is only

sufficient to cater for just under half the housing requirement. Therefore, at Issues and Options consultation in 2015 a series of 7 options/alternatives for growth locations were considered. All these alternatives still promoted brownfield regeneration alongside potential Greenfield release. However, there are viability issues with a number of the remaining brownfield sites which impact on their deliverability. The allocation of the Kidderminster Eastern Extension sites alongside town centre brownfield regeneration would make the most of employment opportunities in the South Kidderminster Enterprise Park and provide good opportunities for access to natural greenspace. A strategic development to the east of Kidderminster would also provide additional facilities such as community infrastructure. This site scores well in terms of its sustainability with good access by foot/cycle to Kidderminster Station as well as the town centre. The entire development parcel is bounded by the A456 to the north and the A448 to the south. A Sustainable Urban Extension to the east of Kidderminster is spatially preferable to one to the south or west of Kidderminster.

Q5.2 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 sets out the exceptional circumstances which justify the proposed changes to the Green Belt at this location.
- 5.2.2 All 4 sites fall within the wider parcel E1 as set out in the Green Belt Review Part 1. (GB01) This parcel forms a substantial part of the Green Belt to the east of Kidderminster. It was scored as making an overall contribution to Green Belt purposes. (figure 3.1 on page 20 of GB01). The two larger sites do not currently have a firm boundary which has led to fears of sprawl into the wider countryside. However, as the development framework for OC6/13N has been continually refined throughout the process, a 30m wide green buffer is now proposed along the eastern boundary which would prevent future sprawl into the open countryside beyond. Thus, the site will be contained and will not encourage sprawl. Development of this site will minimise encroachment into the countryside and maintain the visual separation of Kidderminster from neighbouring settlements to the east (Blakedown) and south-east (Stone). The release of these sites will not compromise the setting of Kidderminster, nor will it prejudice the recycling of derelict and other urban land. It is therefore considered that this land represents appropriate Green Belt release which will deliver residential development in a sustainable location.
- 5.2.3 In addition to this, the Council maintains that the housing requirement cannot be met from sites assessed as suitable for development within

the main urban areas and larger settlements and that the release of land from the Green Belt is the most sustainable solution to this issue. Another justification is that there are inherent constraints on the supply and availability of land which is seen as suitable for sustainable development. Much of the land outside of the Green Belt, that is to the west of the River Severn, is only suitable to meet local needs as there are limited opportunities for employment to the west of the River Severn and already the few crossing points are heavily congested. To concentrate development in the non-Green Belt areas in the western part of the District would not be sustainable. As a result of these constraints, the development needs of Wyre Forest cannot be met without allocating land within the Green Belt. There are consequent difficulties in achieving sustainable development without impinging on the Green Belt. There is insufficient capacity on suitable sites within Kidderminster, Stourport-on-Severn and Bewdley as well as the larger settlements within the Green Belt which have settlement boundaries and adequate access to services to meet the District's development needs. Discussions with neighbouring authorities have not resulted in any of the need being exported to beyond the District's boundaries.

- 5.2.4 In conclusion, the exceptional circumstances that justify releasing this parcel of land comprise housing need for the plan period and beyond, identification of sites submitted through the Call for Sites (which are thus deemed available), the findings of the Sustainability Appraisal, environmental and landscape constraints together with the wider development strategy for distributing growth in the District.

Q5.3 Will the overall development provide for adequate compensatory improvements to the Green Belt?

- 5.3.1 There is currently no public access in this area of Green Belt other than along one public footpath at the southern end which runs from the A448 at Heathy Mill Farm to connect with the wider network to Blakedown and Harvington. The proposals put forward by Taylor Wimpey for sites OC/6 and OC/13N include an extensive network of green routes which will allow footpath access in the north of the site by the railway line with new connections throughout the site and out into the adjacent countryside where there are direct links with the long distance Monarch's Way. It should also be noted that not all of the planned allocation is proposed for removal from the Green Belt with approximately 12ha remaining within the Green Belt. These additional parcels will form important destinations for informal leisure with the southern area centred on the Hoobrook and its pools system and adjacent water meadows and the northern parcel being an area of higher ground with potential as an area of acidic grassland as proposed in the Kidderminster East Strategic Development Corridor Concept Plan (GI03). A network of footpaths is proposed to link

these areas. The objectives of the Kidderminster East strategic corridor include the provision of new routes for access and enjoyment of the local landscape and wider countryside together with habitat creation, particularly of broadleaved and wet woodland and acid grassland.

- 5.3.2 The site is designed around a series of green corridors which will link together with a series of footpaths. It is proposed to extend the Spennells Valley Nature Reserve (to the south of the A448) into the site along the western boundary. The existing watercourse runs through the site in a north-south direction and separates the site from the existing urban edge of Kidderminster. This area provides a unique opportunity to create a natural green open space which will be an asset to both new and existing residents. These natural wetlands and meadows will provide a traffic free walking route connecting through to Borrington Park to the west of the site and the wider site to the north. The eastern site boundary will be formed by a wide natural green buffer which will have footpaths running the entire length of this boundary. Further details are set out on the concept plan attached to the Statement of Common Ground.
- 5.3.3 Approximately 50% of the Taylor Wimpey site is proposed to be left as green and blue infrastructure, the vast majority being natural or semi-natural open space. This provision will open up a new network of footpaths where there is currently no public access allowed other than a single right of way in the southern part of the site.
- 5.3.4 This development proposal offers the opportunity to provide extensive public access to woodland and green corridors where there is currently very little access. Thus, it can be demonstrated that the proposed allocation will provide adequate compensatory improvements to the Green Belt.

Q5.4 (i) What is the basis for expecting that around 1,400 dwellings will be delivered in the Eastern Extension by 2036?

- 5.4.1 ED12 and ED12A (pages 29-31) set out progress to date with bringing the large Taylor Wimpey site forward. A screening opinion (19/0411/EIASO) and scoping opinion (20/0228/SCO) have been submitted and formal pre-application has been undertaken with WCC Highways and Children First, NHS South Worcestershire CCG, Sport England and officers across WFDC. It is intended to progress a hybrid application for the site. A range of technical work has already been undertaken including Phase 1 environmental risk assessment, extended phase 1 habitat surveys, preliminary landscape and visual appraisal, transport report including preliminary junction arrangements and a heritage desk-based assessment has also completed.

- 5.4.2 There is an agreement in place between the landowner and Taylor Wimpey to facilitate development. All the technical work undertaken to date concludes that there are no physical or other constraints to bringing the site forward. Subject to the land being removed from the Green Belt and gaining planning approval, it is considered feasible to deliver the entire proposed allocation within the Plan period. The final pieces of technical work required to support an outline planning application are expected to be finalised by the end of 2020. In terms of actual delivery, as there are two distinct access points, the northern site can be built out concurrently with the larger parcel. Initial development will be at the southern end from the A448. Within 2 years, delivery is expected to be at least 100 dwellings a year with multiple sales outlets being used. A hybrid planning application is expected to be submitted in 2021 with a full application for the first phase of residential development in the southern parcel and an outline application for the remainder of the site. This will allow development to go ahead much earlier than if a purely outline application route was followed.
- 5.4.3 The 2 smaller parcels will come forward independently of the larger Taylor Wimpey site. OC/12 is expecting to deliver dwellings in 2021/22 with preliminary plans already submitted. The northern parcel at OC/5 may lose some land to an amended road junction. No decision has yet been made as to whether this will be in the form of a 3-arm roundabout or a traffic light junction. Pre-application discussions of a potential scheme for this site in 2016/17 were deemed to be premature at the time and thus not progressed.

Q5.4 (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?

- 5.4.4 The Infrastructure Delivery Plan (IFT01) and the Financial Viability Assessment in relation to Kidderminster Eastern Extension April 2020 (ED9A) list the requirements for this site. The development of over 1400 dwellings was fully assessed by delivery partners for infrastructure requirements and will require appropriate infrastructure both on and off-site, including a new primary school and new highways infrastructure. The timing of provision has been discussed with the developer.
- 5.4.5 The various costs referred to in ED9A are the top estimates for each infrastructure requirement based on a maximum cost and completed as a desktop exercise without understanding the site specifics. This was undertaken without knowledge of the master planning and exact location of each infrastructure piece and is the best that could be achieved in the summer of 2019. The costs therefore could be reduced but will be

dependent on how build costs change in the next five years and the exact positioning of the infrastructure.

- 5.4.6 The principle infrastructure requirements are the redesigning of the Mustow Green roundabout on the A450 and the provision of a new primary school together with revised junctions at the two site entrances. The new school will take 2 years to build and needs to be fully operational by the time the 300th dwelling is occupied. Funding arrangements for the school will ensure that the school is forward-funded as necessary and will not delay delivery of the site. Transport infrastructure will be delivered in various ways with some on site projects being delivered by the developers and off-site matters being constructed by delivery partners of Worcestershire County Council. Funding for off-site matters will come from section 106 contributions and appropriate local growth funding bids.

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

- 5.5.1 The SOCG (SD10n) refers to the agreement reached between TW and WFDC that the site can support the delivery of 15% affordable housing. This is due to the large amount of developer contributions identified within the IDP which have impacted on site viability. Policy 32.3 as currently worded does not make any reference to affordable housing unlike Policy 31.1 for Lea Castle Village where mention is made of significant infrastructure costs and the potential for the affordable housing provision to not be policy compliant.
- 5.5.2 It is now proposed to amend the wording for Policy 32.3 1 to read: "The delivery of around 1,400 new dwellings. Affordable housing provision is expected to be in line with Policy 8b. However, it is accepted that provision will be a minimum of 15% across the various phases owing to significant infrastructure costs." This is an additional modification to those proposed in SD12.

Q5.6 (i) How will any competing demands on funding for affordable housing, infrastructure and various facilities be resolved?

- 5.6.1 The Wyre Forest District Council Cabinet members considered a report on viability priorities in September 2020 (ED13). This report sets out how the Council will prioritise the funding allocations through planning obligations for education, highways and affordable housing where a viability assessment has shown that all the obligations cannot be met. The priority agreed by Members was as follows:
- On and off-site infrastructure necessary to make the development acceptable

- Affordable housing
- Open space and recreation
- Education
- Other requests e.g. Health provision, police

Q5.6 (ii) Overall, are the proposed allocations viable?

- 5.6.2 The Infrastructure Delivery Plan (IFT01) sets out the infrastructure required to support the proposals in the Local Plan to 2036 together with delivery mechanisms, the responsible body and potential funding sources.
- 5.6.3 Key costs affecting this development are education and highway with proposed contributions amounting to some £29 million. The strategic infrastructure and mitigation costs (updated in 2019) caused viability to worsen on this site. Various options to overcome this such as increasing numbers of dwellings, looking for other funding sources and revisiting the strategic infrastructure requirements, affordable housing and density requirements were considered by the Local Plan Review Panel. Discussions have taken place between the developer and the Council's viability consultant to try to come to an agreement on a way forward.
- 5.6.4 The Kidderminster East Viability Assessment (April 2020) (ED9A) sets out the different calculations of costs affecting the proposed development. The off-site highway/transport enabling element accounts for around £13 million or £9,300 per dwelling which is very high. It is concluded that this figure is likely to reduce as requirements become clearer. This would then enable additional affordable housing to be provided. The report concludes that the site is viable with 15% affordable housing. However, if the S106 requirements were to reduce from the anticipated £29 million, then the affordable housing contribution would increase from 15% to a maximum of 25% (ie. Policy compliant).
- 5.6.5 Funding from other sources will be sought, in particular Local Growth Funding for transport infrastructure and potential Education Funding Agency support for the delivery of the school. If this is successful, then affordable housing provision is expected to be nearer the 25% as per Policy 8b.

Q5.7 Should provision be made for Gypsy and Traveller accommodation within the overall allocation, subject to identified need?

- 5.7.1 The Eastern Extension is comprised of 4 sites and is a proposed urban extension, taking land from the Green Belt. There are a number of sensitivities on these sites, including landscape and ecology. The sites are also in three different ownerships which would possibly make it

more difficult to allocate pitches on these sites. This location is not considered suitable for GTAA provision.

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 the principles of development in Policy 32.4 be clarified?

5.8.1 The Development Framework Plan in Appendix B of the Submission Plan should be read alongside the site policies at 32.3 and 32.4. A more recent version can be found in the SOCG (SD10n). This 'concept plan' was included as part of the consultation document to assist local residents in visualising how the development would sit within the context of the existing built fabric. This 'concept plan' reflects twenty one principles of development for the site which are set out in Policy 32.4 which include approximately 50% of the site being greenspace, the creation of distinct "village green" character areas, alongside those to protect and enhance the natural setting of the site. It sets out how the vision contained in Policy 32.3 could be implemented. A cross reference is required in the introduction to the two policies to signpost readers to Appendix B. It should be noted that this Concept Plan is likely to be further modified as more information is gathered. This plan should be regarded as purely illustrative in policy terms as it is not finalised.

Q5.8 (ii) Should these policies be re-ordered and amended for clarity and effectiveness?

5.8.2 The Council does not consider that there is any justification in re-ordering these policies. These policies were worked up jointly with the developer and their agents. Suggested amendments are outlined in the Table of Modifications (SD12) to take account of modifications outlined in the SOCG with the Environment Agency (SD10j) plus additional modifications requested by Sport England and the Environment Agency – MA/32.1-4.

5.8.3 Additional minor modifications (SD11) have also been suggested (MI/32.1-6) including an introductory paragraph to explain what Policy 32.4 contains. (MI/32.5)

5.8.4 If the Planning Inspector can explain the rationale for reordering the policies, then the Council is happy to do so.

Q5.9 (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?

5.9.1 The Plan makes provision for effective integration of the 2FE primary school and community uses. Pedestrian and cycle links will be provided

from the site connecting with existing development on Comberton Estate (through Borrington Park) and on Offmore Estate (via Offmore Farm Close) and on through to the rail station and town centre (set out in Local Plan Policy 32.3). The County Council has a track record of working with developers to promote quality design principles with attractive and safe routes within the development site.

- 5.9.2 The Plan also makes provision for an active travel corridor on A448 Comberton Road with a new cycle way (on and off road) from Spennells Valley Road towards Kidderminster Railway Station (set out in Local Plan Policy 32.3) This is a significant opportunity to increase travel options for the eastern side of Kidderminster promoting wider benefits beyond the Allocated sites for the Kidderminster.
- 5.9.3 This follows on from historic work undertaken by the County Council examining sustainable connections between the East side of Kidderminster, the Town Centre and railway station. It is envisaged that this infrastructure will be secured by planning condition/ obligation, and it is currently being considered as part of the pre-application discussions for the two larger sites. Where additional funding may be required to deliver the entirety of the infrastructure, wider S106 obligations and Local Growth Funding options are available should this not be entirely delivered by developers as part of planning applications.
- 5.9.4 Contributions towards site-wide personalised travel planning will be secured through the S106 agreement for each emerging parcel as outlined in Wyre Forest District Council Infrastructure Delivery Plan (WFIDP) June 2019 at 3.1.22. (IFT01)
- 5.9.5 The County Council uses the Modeshift STARSfor (Sustainable Travel Accreditation and Recognition Scheme) system which is the national travel plan rating scheme that has been established to recognise excellence in supporting walking, cycling and other forms of sustainable transport. As sites emerge, it is anticipated that travel planning will form a significant component of the sustainable transport strategy as already embraced for other developments within Wyre Forest.
- 5.9.6 The Plan makes provision for contributions required as part of maximising sustainable travel opportunities as set out in the WFIDP (IFT01)
- 5.9.7 The submitted Environmental Impact Assessment Scoping Report confirms that a Transport Assessment will be prepared, supported by an Interim Travel Plan, with the overarching strategy to minimise the effect of car trips from the proposed development¹. Following the assessment,

¹ Environmental Impact Assessment: Scoping Report, Taylor Wimpey, (Pegasus Group), February 2020, 4.13.21

appropriate recommendations for mitigation measures to reduce any adverse effects will be incorporated into the design where possible.

- 5.9.8 The Transport Report² shows the proximity of parts of the National Cycle Route Network (NCN) to the urban extension which will allow opportunities to connect to the NCN routes. There are also approximately nine buses an hour in both directions serving the local area, with services to Bewdley, Droitwich Spa and Stourbridge³. The internal spine road is designed to be 6.3 m wide to accommodate two-way bus movements, with 1.5m on-carriageway cycleway on both sides allowing for cyclist priority, and 2m footways either side⁴.
- 5.9.9 The Community Hub within the urban extension is proposed to contain a community bike share hub and a Transport Information Centre (TIC). The TIC will promote sustainable travel by providing information in relation to bike sharing, car clubs, carpooling, demand responsive transport and electric vehicle charging points. Information on walking, cycling and public transport and maps will also be provided⁵.
- 5.9.10 Within the sustainability report the urban extension has been categorised as having a minor positive (OC/5, OC/6, OC/12) and major positive (OC/13N) to the current situation to SA objective 5 to reduce the need to travel and move towards more sustainable travel modes. (SD04)
- 5.9.11 The proposed car parking allocations for Blakedown station (WFR/CB/2 & WFR/CB/3) will also encourage sustainable transport for rail users on the commuter line to the Black Country and Birmingham. Other transport related projects within the plan period have been identified within the Infrastructure Delivery Plan. (IFT01)

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

- 5.9.12 The Transport Evidence in support of the Plan utilised the 2036 WFTM which tested the entirety of the Allocation. The strategic modelling identified network constraints relevant to the Kidderminster Eastern extension where there are network constraints on the A449, A456 and A448; these links are impacted by the Plan allocations in both AM and PM peak periods.
- 5.9.13 The Plan makes provision for capacity enhancements at junctions along these key links as set out in Wyre Forest District Council, Infrastructure Delivery Plan, June 2019. Specifically, the Plan identifies the following

² Taylor Wimpey Appendix 4 Comberton Road Transport (Vectos) December 2018. Figure 2.5, p10.

³ Taylor Wimpey Appendix 4 Comberton Road Transport (Vectos) December 2018. Figure 2.8, p14

⁴ Taylor Wimpey Appendix 4 Comberton Road Transport (Vectos) December 2018. Paragraph 3.11

⁵ Taylor Wimpey Appendix 4 Comberton Road Transport (Vectors) December 2018. Paragraph 3.36-38.

key junctions in Kidderminster and areas where enhancements will be required to deal with the traffic impacts of the Allocation based upon the traffic modelling (Wyre Forest District Council, Infrastructure Delivery Plan, June 2019, Appendix 1: Schedule of Infrastructure):-

- Capacity enhancements to A449 Chester Road North/A456 Birmingham Road junction
- Capacity enhancements to A449 Chester Road south/Comberton Road
- Capacity Enhancements to A448/Spennells Valley Roundabout
- Capacity Enhancements to A449/Spennells Valley Road/Chester Road South Roundabout
- Capacity enhancements to A449/A442/Wilden Lane Roundabout
- Capacity enhancements to A448 Comberton Hill/A451 the Ringway Roundabout
- Capacity enhancements to A456 Husum Way Roundabout
- Capacity enhancements to Carpet Trades Way/Park Butts Ringway/St Marys Ringway
- New Roundabout Wolverley Road (Lea Castle site)
- Enhancements to A451 Stourbridge Road/Broadwaters Drive/Chester Road North Roundabout

5.9.14 Having identified key locations requiring capacity enhancement utilising the strategic model, and defining the broad mitigation strategy in the Infrastructure Development Plan, the development of the Transport Assessment and appraisal procedure by the Developer will use a microsimulation model of the Kidderminster area to analyse the effects of 1400 dwellings on journey times, queuing and congestion, and impacts at the key junctions detailed above. In addition, local individual junction models will be developed to test specific interventions in detail.

5.9.15 The County Council are working closely with the Promoter on the development of the transport assessment and transport modelling exercise. It is the intention to align the site appraisal with the existing Wyre Forest Strategic model to understand how the two models correlate within the urban area and, additionally, to use the wider strategic model results to understand constraints on the flow of traffic outside of the area covered by the microsimulation model across the District and neighbouring Authorities.

5.9.16 This is a 3-stage approach: having already tested the strategic effects of the allocation, develop a Town Centre microsimulation model and following this the development of junction assessment models for

junction improvement optioneering. Contributions will be sought and/or planning conditions will be advised to deliver enhancements where necessary as sites emerge in greater detail. The Plan makes provision for multiple funding and delivery mechanisms outlined in the Wyre Forest District Council, Infrastructure Delivery Plan, June 2019, Appendix 1: Schedule of Infrastructure (ITP01).

5.9.17 The County Council has a track record delivering major transport schemes on-time and on budget, successfully obtaining consents for major infrastructure and, internal resourcing and governance requirements for major schemes & packages, developing and maintaining good working relationships with key partners and stakeholders and, delivering schemes and packages via a suite of term contracts.

5.9.18 This is evidenced by schemes such as: -

- A38 BREP Package 1 works to Barley Mow Lane – complete – and works to M5 Junction 4 and M42 Junction 1 (under construction)
- Worcestershire Parkway Railway Station
- The Worcester Southern Link Road (SLR), phases 1, 2, and 3
- SLR Phase 4 (Under Construction)
- Kidderminster Railway Station Building
- The Hoobrook Link Road (Phase 2)
- The Worcester Transport Strategy (Phase 1) Major Scheme (WTS)
- Multi-Modal Corridor Enhancement Schemes: i) Newtown Road Corridor; and ii) Bromyard Road Corridor.

Q5.10 (i) Overall, are the detailed policy requirements clear, consistent, justified and deliverable?

5.10.1 The detailed policy requirements for Kidderminster Eastern Extension are clear, consistent and justified. The specific requirements are drawn from the evidence base of the plan preparation including the site selection methodology (SSP01), green infrastructure concept statement (GI01-GI02), the Heritage Impact Assessment (HSR01), Strategic Flood Risk Assessment (FR01) and the Infrastructure Delivery Plan (IFT01). The deliverability of the site is based on the Housing and Economic Land Availability Assessment report (HOU04a) within the evidence base of the local plan. The detailed policy requirements have been drawn up with cooperation of our colleagues in the Development Management team to ensure that they are justified and deliverable.

5.10.2 Sites OC/6 and OC/13N as discussed within Policy 32.3 of the Local Plan, will deliver a 1400 major urban extension to the east of Kidderminster

town. Given the comprehensive scale of the development, this will be able to support additional features such as a community hub to include land for a primary school and junior grass football pitch, retail provision and a community facility to accommodate a meeting room, café and potentially a GP surgery.

5.10.3 Pedestrian and cycle links will be provided from the site to connect with existing developments on Comberton Estate and Offmore Estate, and through to the rail station and the town centre. Approximately 50% of the site area is proposed as green space which will promote a healthy and safe area for both the new and existing communities.

Q5.10(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?

5.10.4 All developments will be expected to be of a high-quality design, to be consistent with Policy 27A. A Design and Access statement will be required to demonstrate design that integrates effectively with its surroundings, to reinforce local distinctiveness and conserve, where appropriate, enhance cultural and heritage asset, landmarks, and their settings. The development will aim to achieve Building for a Healthy Life and Building with Nature accreditation.

5.10.5 A financial viability assessment has been prepared for the development. This demonstrates that with a reduced % of affordable housing and full S106 contributions, development can be delivered. (ED9A)

5.10.6 The development site is located near to the historic Lord Foley's irrigation scheme, which is an extensive system of well-defined ditches and channels. Sensitive management of this scheme is raised within the Kidderminster East Strategic Development Corridor Concept Plan (GI03) along with other key green infrastructure principles. A Heritage Based Assessment has already been prepared for the development⁶.

5.10.7 A comprehensive green infrastructure strategy will be developed in line with the Concept Plan. The Flood Risk Assessment will also include consideration of the irrigation system⁷.

⁶ Appendix 5 Comberton Road Heritage Desk Based Assessment, CSA (December 2018). Consultation reference LPPS1011.

⁷ Environmental Impact Assessment: Scoping Report Comberton Road, Kidderminster. Pegasus Group (February 2020), Paragraph 4.12.27. 20/0228/SCO Application via WFDC Planning Portal.