

# Wyre Forest Local Plan Examination

Hearing Statement on behalf of Richborough Estates

Matter 6(i): other allocations for housing and mixed uses; reserved housing sites – Kidderminster

December 2020

**Turley**

# Contents

1.	Introduction	1
2.	Response to the Inspector's questions	2
	Appendix 1: Site location plan	7
	Appendix 2: Proposed Boundary Allocation Plan	8

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**Client**  
Richborough Estates

**Our reference**  
RICQ3010

3 December 2020

# 1. Introduction

- 1.1 This Hearing Statement has been prepared on behalf of Richborough Estates in respect to land they are promoting to the north west of Habberley Road, Kidderminster ('the site'). A site location plan is enclosed at **Appendix 1**.
- 1.2 The site forms proposed allocation WA/KF/3 (policy 30.21) in the emerging plan. It represents a sustainable and deliverable opportunity for a minimum of 120 new homes and public open space.
- 1.3 Richborough Estates is currently engaged in pre-application discussions with the local planning authority regarding the proposed submission of an outline planning application for the site in early 2021. The application will demonstrate that the site is deliverable in the short term, with no technical constraints which prohibit the early delivery of the site.
- 1.4 Richborough Estates will attend hearing session 6(i). This statement provides written responses to Q6.1 to Q6.5) inclusive, and welcome the opportunity to participate in the Matter 6 hearing session on 21 January 2021.

## 2. Response to the Inspector's questions

**Q6.1 Is the selection of the other site allocations in each of the identified areas based on an adequate assessment of all potential sites, including sustainability appraisal and assessment of their roles in serving Green Belt purposes? In particular:**

**a) have the assessments used suitable methodologies and applied them consistently?**

- 2.1 Yes, the Council's Site Selection Paper (August 2019) (**CD SSP01**) and pre-submission plan Sustainability Appraisal (SA) (**CD SD04**) is clear on this. The process taken is summarised below. From the process it is clear that all sites have been assessed consistency.
- **Call for sites** in Autumn 2014.
  - **Further call for sites** in September – October 2015.
  - **Local Plan Review issues and options consultation** in September – October 2015. This presented seven broad options for growth.
  - **Sites considered through Local Plan Review Panel** (comprising local estate agents, planning agents and architects) in winter 2015.
  - **Housing and Economic Land Availability Assessment** (HELAA) report published in June 2016 assessing each site submitted to date.
  - Five meetings of the Local Plan Review Panel (made up of District Councillors and Town Council representatives) in 2016 to discuss the overall plan strategy and brownfield focus and the HELAA findings.
  - **Further call for sites** in June – August 2017.
  - Four meetings of the Local Plan Review Panel in 2017 to discuss housing needs and the sites which were to be presented in the preferred options paper.
  - **Local Plan Review preferred options** consultation in May 2017. This combined the broad options for growth into two specific growth options, either few larger sites in the Green Belt to the east of Kidderminster, or more dispersed growth across the District.
  - Following the preferred options consultation each site promoted through the Council's call for sites was freshly assessed against the same relevant criteria, such as access to services, benefits to housing, travel, soil and land, water and flooding, landscape, biodiversity, employment, historic environment, Green Belt and community (as demonstrated at table 5.2 of the pre-submission plan SA (**CD SD04**)). Based on the assessment of a site's overall impact and its scoring it was either:

- not taken forward
  - taken forward as a reserved housing site
  - Taken forward for further consideration
- As per section 9 of the site selection paper (**CD SSD091**) meetings were then undertaken with the relevant statutory consultees (such as Historic England, the Environment Agency and Worcestershire County Council etc.) to further explore all sites based on all evidence based work that had been undertaken, including those which were not to be taken forward. At this point it was also considered whether smaller parcels of sites promoted would be suitable to come forward. This resulted in a number of sites being reassessed (mainly on highway and ecology grounds).
  - Six meetings of the Local Plan Review Panel in 2018 to discuss additional housing sites to be included in the plan and all proposed allocations.
  - **HELAA update** published in August 2019 (**CD HOU04**) assessing each site submitted to date.
  - The sites proposed for allocation are assessed in the pre-submission SA (**CD SD04**) which was published as part of the Local Plan Review pre-submission plan consultation in July 2019 (table 6.2 of the SA).
- 2.2 Notably Richborough Estates' site to the north west of Habberley Road, Kidderminster (policy 30.21 - WA/KF/3) was recommended to be an allocation when smaller parcels of larger sites were considered acceptable as per footnote 9 of the pre-submission plan SA (**CD SD04**).

**b) is it clear why the Council has decided to allocate the specific sites and not others?**

- 2.3 Yes, it is. As per our response to **Q6.1 a)** above, all sites promoted through the plan were freshly assessed against the same criteria following the preferred options consultation as per table 5.2 of the pre-submission plan SA (**CD SD04**).
- 2.4 All sites, included those recommended to be discounted by the process undertaken at table 5.2, were reassessed as part of discussions with stakeholders, the result of which was some discounted sites were then recommended for allocation.

**c) is the proposed development of each of the allocated sites consistent with the Plan's vision, aim and objectives and with national planning policy?**

- 2.5 Yes. In particular Richborough Estates' site to the north west of Habberley Road (policy 30.21 - WA/KF/3) will see growth being focussed at the district's most sustainable settlement, Kidderminster, contributing to its viability and vitality, whilst having minimal impact on the surrounding environment.

**Q6.2 (i) Are the specific requirements for development of the sites justified, consistent with national planning policy, and likely to be effective? Do they make sound provisions for the number and types of dwellings, mixed uses and other needs, air quality, noise and flood protection, infrastructure requirements including green and blue infrastructure, and protection and enhancement of the natural and historic environment?**

2.6 The specific requirements for the development of land west of Habberley Road (policy 30.21 - WA/KF/3) at emerging policy 30.21 are justified, consistent with national planning policy and will be effective, subject to our comments below.

2.7 An outline planning application is to be submitted for the allocation in January 2021, the pre application discussions informing this have explored the requirements set out in Q6.2(i). The application will demonstrate that these requirements can be met in full.

- **Access to be taken from Habberley Road** – the transport assessment work undertaken by Richborough Estates identifies that this is the most suitable location for the site to be accessed. The Council’s Transport Evidence paper (June 2019) (**CD IFT02**) demonstrates that development at the site will not adversely impact the local road network, and Richborough Estates’ site specific highways assessment aligns with this conclusion.
- **retention of hedgerows and trees** – this will ensure that the site meet’s the emerging plan’s requirement for sites to provide a minimum of 40% green infrastructure (policy 14). This also contributes to compensating for the loss of Green belt as per NPPF paragraph 138 and ensuring that the site delivers a net gain in biodiversity in accordance with NPPF paragraph 170. As part of the pre-application process Richborough Estates have presented two illustrative masterplan concepts which both provide a minimum of 40% green infrastructure and as part of the wider green infrastructure provision are able to demonstrate a net gain in biodiversity.
- **setting back development to protect the setting of High Habberley House** – High Habberley House is not included on the Wyre Forest District Local Heritage List, nor is it a listed building, with the Historic Environment Record (HER) noting that it is a *‘Partially extant 19th century unlisted farmstead with converted buildings...There has been significant loss (greater than 50%) of traditional buildings.’*

A Heritage Assessment has been prepared as part of the site specific evidence base, and identified that there is currently no inter-visibility between Habberley House and the site, this is predominantly due to the strong tree planting and existing high hedgerows along the southern boundary of the study site and the southern boundary of the bridleway lying beyond. In addition modern care home buildings that have been constructed to the north and east of Habberley House which further limit its connectivity to the wider landscape and the site.

Notwithstanding this, the illustrative masterplan prepared as part of the pre-application process includes a suitable offset from the south western boundary and identifies additional planting along the boundary.

Given that Habberley House is not listed, nor is it on the Wyre Forest District Local Heritage List and in addition to the modern care home buildings and substantial vegetation between the site and Habberley House, Richborough Estates consider that this element of the policy wording should be removed.

- **Rear hedgeline to be reinforced by wider landscape buffer as this will form new Green Belt boundary** – the site, as proposed for allocation, can deliver a landscape buffer along the north western boundary which will provide a clearly recognisable and defensible Green Belt boundary.

As identified in Richborough Estates' **Matter 3 hearing statement**, further compensatory improvements (as required by NPPF paragraph 138) can be provided through extending the red line allocation boundary of the proposed allocation at Low Habberley (policy 30.21 – WA/KF/3).

As demonstrated by the proposed allocation boundary plan enclosed at **Appendix 2**. This additional land would retain Green Belt status, thus preventing any residential development in this specific area, and comprise enhanced landscaping planting to complement existing hedgerows and trees and enable public access to Green Belt which would otherwise remain in agricultural use. It would further reinforce and formalise the Green Belt boundary. All development proposed would be located within the extent of the draft allocation.

**Q6.3 Is each of the allocated sites viable and likely to be delivered within the expected timescale? Does the evidence, including any up-to-date information, support the housing trajectory for the individual sites?**

- 2.8 Richborough Estates' site west of Habberley Road (proposed allocation WA/KF/3) is viable and will be fully delivered within the first five years following the plan's adoption, including a policy compliant provision of affordable housing. Indeed an outline planning application will be submitted in January 2021 which will demonstrate the deliverability of the site.
- 2.9 The Council's pre-submission version Infrastructure Delivery Plan (June 2019) (IDP) (**CD IFT01**) demonstrates that there are no significant infrastructure requirements for the site beyond those expected for greenfield sites of this nature, such as financial contributions towards education provision.

**Q6.4 Regarding the changes to the Use Classes Order in September 2020, are any modifications required for the soundness of the allocation policies?**

- 2.10 The changes to the Use Classes Order (September 2020) are focussed around the creation of the new Use Class E which replaces existing A1/2/3 and B1.

- 2.11 The proposed residential allocation of land west of Habberley Road, Kidderminster (WA/KF/3) is for a residential use only (class C3). Use class C3 remains as previous following the changes to the Use Classes Order and so no modifications are required to this proposed allocation.

**Q6.5 Taking account of the specific characteristics of the allocation sites that are currently within the Green Belt, are there exceptional circumstances that justify the proposed alterations to the Green Belt boundary?**

- 2.12 We set out in our **Matter 3 hearing statement** that there are exceptional circumstances for releasing land from the Green Belt to meet the district's housing needs, meeting the test established at NPPF paragraph 137.
- 2.13 Kidderminster, the district's most sustainable settlement, is where the overall spatial strategy seeks to deliver the majority of growth given its existing provision of services and facilities. The town is wholly surrounded by Green Belt, therefore the release of land from the Green Belt is necessary to ensure the plan delivers the district's housing needs in full whilst promoting a sustainable pattern of development as required by NPPF paragraph 138.
- 2.14 As part of delivering this strategy to focus growth at Kidderminster a mix including smaller, shorter term sites which require limited infrastructure improvements is necessary to ensure the district can deliver its needs following adoption of the plan, with the larger allocations delivering later in the plan period.
- 2.15 A site specific Landscape Visual Impact Assessment has been prepared to inform the pre-application process, identifying that the site does not lie within a landscape that is designated at either a national or a local level for its landscape value or quality. In assessment of the proposed development with regard to the local landscape, the proposed development has been found to give rise to only limited and localised landscape and visual impacts. In line with the proposed wording of Policy 30.21 – WA/KF/3, development of the site will provide improved recreational benefits with new footpaths and additional publicly accessible green spaces with new tree and hedgerow planting and SuDS attenuation. The western site boundary (new robust Green Belt boundary) is retained and enhanced, with a development set back providing a buffer for new tree planting to improve the appearance of the developed edge from the north west.
- 2.16 Therefore exceptional circumstances exist to support the proposed allocation of Richborough Estates' site on land west of Habberley Road, Kidderminster (WA/KF/3).



## **Appendix 1: Site location plan**





Key

Allocation site boundary  
5.64ha (13.94 acres)

Other land under control of  
applicant



01050 m



Richborough  
Estates



nineteen47  
CHARTERED TOWN PLANNERS  
& URBAN DESIGNERS

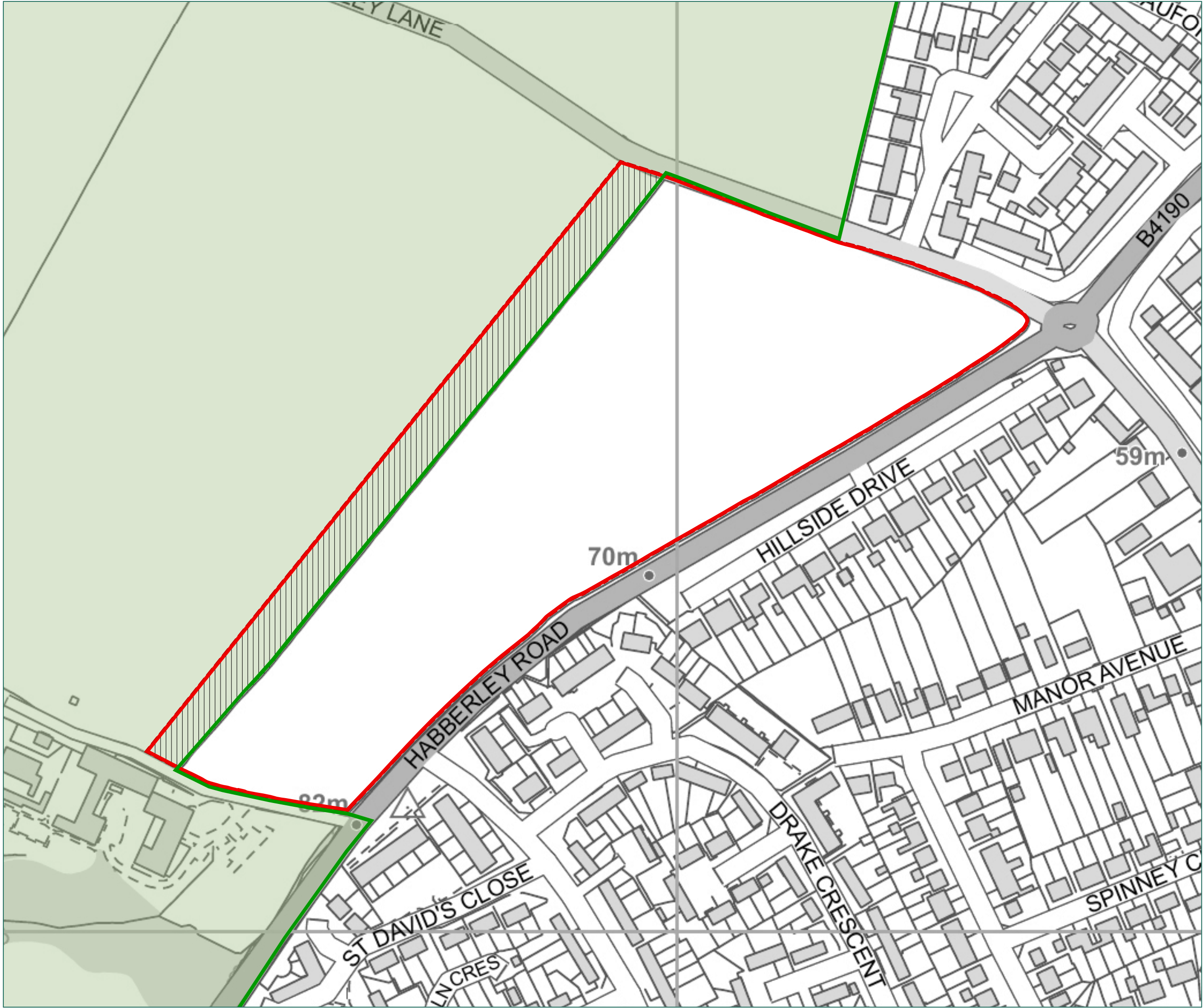
Project  
Habberley Road, Kidderminster

Drawing Title  
Site Location Plan





Project Code n1476	Drawing Nr 001-10	Rev -
Date 26.11.2020	Drawing Scale 1:1,250 @ A1	

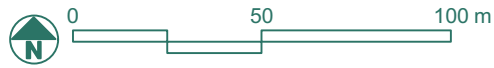


## **Appendix 2: Proposed Boundary Allocation Plan**



Key:

-  Proposed Allocated Site Boundary (5.62ha)
-  Strengthened Green Belt Boundary (1.04ha)
-  Settlement Boundary
-  Green Belt



Project  
Low Habberley

Drawing Title  
Site Allocation Plan

Project Code	Drawing Nr	Rev	Drawing Scale
n1204 004 001-01	B		1:2,000 @ A3

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