



Wyre Forest District Council Local Plan 2016-2036

Examination

Matter 6: Other Allocations for Housing and Mixed Uses; Reserved Housing Sites

(Matter 6(ii) Stourport-on-Severn (Section 33))

[Note: Gypsy and Traveller/Travelling Showpeople sites will be considered in Matter 8; employment sites and previously developed sites in the Green Belt will be considered in Matter 9]

Wyre Forest District Council Response

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Wyre Forest District Council

Wyre Forest District Local Plan (2016-2036) Examination

Matter 6: Other Allocations for Housing and Mixed Uses; Matter 6(ii)

Stourport-on-Severn (*Section 33*) [Note: Gypsy and Traveller/Travelling Showpeople sites will be considered in Matter 8; employment sites and previously developed sites in the Green Belt will be considered in Matter 9]

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?

- 6.1.1 The Council considers that the site assessments have used suitable methodologies and that they have been applied consistently.
- 6.1.2 All potential sites were initially assessed through the Housing and Economic Land Availability Assessment (HELAA) (HOU04/04a). The methodology for this was prepared in accordance with the NPPF and the NPPG at section ID3. The HELAA aims to identify sites and broad locations with development potential, assess their potential and suitability, and finally their likelihood of being delivered. Chapter 2 of HOU04 sets out the methodology used. Much of this work was undertaken by Council officers. However, an independent panel of specialists met over a series of weeks to discuss all the potential sites put forward in terms of their likelihood of being developed.
- 6.1.3 The Sustainability Appraisal also assessed all of the potential allocations. A framework of sustainability objectives was developed for assessing the suitability of both the proposed policies and individual sites. A Policy Framework with 13 SA objectives has been used to assess the impacts of the Local Plan's vision and objectives, strategic options and policies. A specific SA framework was developed for the sites. This was revised in response to comments received at Preferred Options consultation and also to make it more practical and useful. To avoid duplication, the SA information was integrated into the HELAA site forms. Table 5.2 of the SA shows how the sites scored against the SA objectives.
- 6.1.4 A Green Belt Review has also been undertaken. This divided the Green Belt within Wyre Forest into 59 parcels for survey. Interested parties were consulted on the study methodology in May/June 2016. The methodology is based on that developed by Land Use Consultants and which has been informally agreed by various West Midlands authorities. The method deliberately does not use scoring to arrive at judgements as

this would create problems of consistency. A common survey proforma is used for the different parcels. A Stage 2 assessment was then undertaken looking at smaller parcels which were being considered as potential allocations. The same methodology was used as at the strategic level first stage.

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

- 6.1.5 The Site Selection Paper (SSP01/a/b) outlines the process undertaken starting with Issues and Options Consultation in 2015 followed by the Preferred Options Consultation in 2017. Several evidence base studies were commissioned in 2016 and many of these studies showed potential issues with some of the existing unimplemented allocations. Brownfield sites often have issues with flooding, both fluvial (from the Rivers Stour and Severn) and from surface water runoff. There are also viability issues affecting many of the brownfield sites. For this reason, a few of the existing allocations from the Site Allocations and Policies Local Plan (2013) (DPH02) were not taken forward into the Preferred Options. One of the key issues to come out of the 2017 Consultation was a wish to limit Green Belt release and revisit the potential pool of brownfield sites to see if there were any that could be redeveloped for residential use. A few sites which officers had previously discounted as being undeliverable were put forward for consideration together with new sites from landowners. New information was either received via the Preferred Options Call for Sites or else there was evidence of the site being marketed for redevelopment. During late 2017 a Brownfield Land Register was published and some of these sites are now proposed allocations.
- 6.1.6 The involvement of the Local Plan Review Panel was key to the process of discussing site selection. This group consisted of District Councillors across all political parties together with representatives from the three town councils. This Panel met several times to discuss sites and it was concluded that there was insufficient brownfield capacity to meet identified housing need and for the first time since 1974, Green Belt boundaries would have to be reassessed. The final development strategy builds on that of the Adopted Core Strategy (2010) which concentrated development on urban brownfield sites.
- 6.1.7 The appendices to the Site Selection Paper (SSP01/a/b) list those sites which were considered earlier on in the process and subsequently removed together with the reasons for those decisions. The Housing Topic Paper (ED3) also contains an updated spreadsheet of sites considered for allocation. In terms of Stourport-on-Severn sites, Appendix 2 lists 7 sites which were deleted after Preferred Options

consultation together with the reasons. Appendix 3 lists 3 sites in Stourport-on-Severn which were submitted at Preferred Options via the Call for Sites or initially suggested by officers but did not get taken forward. Appendix 4 lists 8 sites in Stourport-on-Severn that were added in at Pre-Submission stage. Some of these were submitted through the Call for Sites at Preferred Options, others had previously been included in the HELAA. Two were also existing allocations in the Site Allocations and Policies Local Plan (AKR/10 and MI/7). One of these sites (AKR/18) was subsequently removed in 2019 as new information came to light which showed that the site's development would have severe ecological implications. The justification for the removal of the site can be found at Appendix 6 of SSP01.

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?

6.1.8 The aim of the Local Plan is to set out:

- the areas where development will take place.
- the areas that will be protected; and
- policies that will be used to determine planning applications.

6.1.9 The site allocations are consistent with the NPPF:

- Paragraph 8 by ensuring that there are sufficient homes built meeting the identified need.
- Paragraph 15 by ensuring a positive vision for the future of each area...addressing housing needs.
- Paragraph 67 ..." planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability".
- Paragraph 127 by ensuring that the site allocations "optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks."

6.1.10 The site allocations are consistent with the aim of the Local Plan, sites are allocated in areas where the Council consider that the sites are sustainable locations whilst protecting other areas of the District where site allocations have not been proposed. This complies with Plan objective 1 which encourages long-term sustainable development. Part C of the Submission Plan, Proposed Allocations, outlines specific detailed policies for each site.

- 6.1.11 The Council considers that all of the site allocations in Stourport-on-Severn are consistent with the spatial vision and objectives together with a Plan aim to address housing needs in order that existing and future residents' requirements are met... (objective 3) when read alongside other Plan policies. The site allocations also are consistent with plan objective 5 maximising the use of previously developed land ensuring the best use is made of available land.
- 6.1.12 These allocations will ensure that Stourport-on-Severn benefits from sustainable brownfield regeneration (vision 3) and to maximise the use of previously developed land in order to ensure the best use is made of available land both within and beyond the main towns (objective 5). Stourport-on-Severn as a large market town continues to be a focus for growth within the Plan period, but it is important that the towns maintain their distinctive and separate identities. Many of the allocations will also aid the vision of the River Stour and the Staffordshire and Worcestershire Canal together with green infrastructure providing valued links for both wildlife and residents both within Stourport-on-Severn and beyond (vision 1).
- 6.1.13 All of the proposed allocations directly support Objectives 1-3 to encourage sustainable development, address key challenges around housing, employment, health, and transport. The majority of the residential allocations in Stourport-on-Severn (13 out of 18) will redevelop brownfield sites, including former industrial sites which are now coming forward for redevelopment. These include Carpets of Worth, which was the site of a former carpet works (AKR/20), and Cheapside, a former manufacturing site (AKR/2).

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?

- 6.2.1 The specific requirements for the sites within the Local Plan are drawn from the conclusions within the evidence base documents assembled during the plan preparation process including the site selection methodology (SSP01), green infrastructure concept statements (GI01-GI03), Preliminary Ecological Appraisals (GI06-GI08), the Heritage Impact Assessment (HSR01), Strategic Flood Risk Assessment (FR01), and the Infrastructure Delivery Plan (IFT01).
- 6.2.2 Paragraph 29.7 within the Local Plan (SD01) outlines the structure of the sites allocations within policies 30 to 36. The policies also set out the

specific requirements for the individual sites, which are consistent with the National Planning Policy Framework (NPPF). The specific requirements as outlined within the individual site policies will be delivered by developers and through S106 agreements.

- 6.2.3 The number and types of dwellings proposed within the Local Plan are drawn from the Housing Need Study (HOU01) which has evidenced the overall requirement for 276 new dwellings per annum plus 487 C2 institutional units over the whole plan period. The overall mix by dwelling type, size and tenure is summarised in Table 7.6 (HOU01). Table 8.0.1 shown in Policy 8A of the Submission Local Plan reflects this data. It should be noted that this data will be subject to regular review. The Plan period will see an increased demand for smaller two- and three-bedroom dwellings and a reduction in demand for four-bedroom dwellings. This is due to a variety of factors such as rising divorce rates, desire for downsizing in later life, and newly forming households as youngsters set up on their own. The average household size in the district is expected to be 2.1 by 2036, compared to 2.25 for Worcestershire as a whole, and 2.34 for England¹. The employment land provision and specific site allocations are drawn from the 2018 Employment Land Review update within the evidence base (ECON04).
- 6.2.4 Although Stourport-on-Severn does not have an existing Air Quality Management Area (AQMA), it does have an area with high pollution levels which are slightly below the level required to justify an AQMA. Policy 16A states that development proposals must be designed to avoid significant adverse impacts from pollution on the AQMAs. It is important that levels do not worsen because of proposed development within the town. Air quality within Stourport-on-Severn in the Plan period will be positively affected by the recent decision by the UK government to end the sale of new diesel and petrol cars by 2030 as part of the Green Revolution Plan². Policy 24B in the Local Plan also includes a requirement that all new developments should include electric car charging points. Appropriate noise mitigation measures have been referenced for the relevant specific site policies, which is consistent with paragraph 180 of the NPPF.
- 6.2.5 The specific requirements contained in a number of the site policies in relation to flood protection have been informed by the Strategic Flood Risk Assessment (FR01) within the evidence base. The Local Plan has applied a sequential risk-based approach to the location of development, consistent with paragraph 157 of the NPPF and the Flood Risk Sequential Test Assessment of Proposed Development Sites (FR02).

¹ WFDC Housing Topic Paper (June 2020), paragraph 4.9 (ED3)

² <https://www.gov.uk/government/news/pm-outlines-his-ten-point-plan-for-a-green-industrial-revolution-for-250000-jobs>

- 6.2.6 The specific requirements for the sites are considered to make sound provision for each site and are justified by the Infrastructure Delivery Plan within the evidence base (IFT01) to meet paragraphs 92-94 of the NPPF. This is a living document that details both the infrastructure required to support the proposals, the development sites in the plan, and the likely delivery partners. The IDP sets out future capacity requirement for education, health, utilities, community space and transport. Additionally, Travel Plans will be required for all major developments (Policy 13).
- 6.2.7 In terms of green and blue infrastructure, a number of proposed modifications are suggested for Policy 14 (see SD12) which will have implications for the many brownfield sites in Stourport-on-Severn. The Policy does not give an indication of the quantity of GI expected on brownfield sites. However, mitigation would be expected if the proposed development impacts negatively on protected sites or where brownfield sites have high environmental value. New development will be expected to retain, protect and enhance Green Infrastructure (GI) assets by integrating GI into developments and contributing positively to the District's green infrastructure network (Policy 14). A number of large brownfield sites are located alongside the Rivers Stour and Severn or the Staffordshire & Worcestershire Canal. Where appropriate, specific site requirements have included proposals to take into consideration the Waterfront Strategic Development Corridor Green Infrastructure Concept Statements (GI01-GI03).
- 6.2.8 Within table 3.0.1, the vision of Wyre Forest District by 2036, section 2 addresses the natural and historic environment, in that *'The District's varied natural habitats, together with its diverse and historical landscapes are thriving, and offer a range of outdoor interests, contributing to local educational opportunities and sustainable tourism'*. Any proposal that is likely to affect the significance of a heritage asset will have a specific requirement to submit a Heritage Statement with the planning application.
- 6.2.9 As outlined in paragraph 29.7 of the Plan, as well as any site-specific policies set out in Chapter 33 Stourport-on-Severn, any provisions of other relevant policies must also be taken into consideration by developers.

Q6.2 (ii) Should provision be made for Gypsy and Traveller accommodation on any of the sites, subject to identified need?

- 6.2.10 Gypsy and Traveller site provision is outlined in Policy 8F. This policy shows that all of the existing provision is within Stourport-on-Severn. The 2014 Worcestershire Gypsy and Traveller Accommodation Assessment (HOU05) identified a need for 29 pitches over the Plan

period of which 12 have already been provided or allocated. Since Plan submission a new GTAA has been produced for Wyre Forest (ED15). This new study also shows a net shortfall of 29 pitches for the Plan period.

6.2.11 Proposals for Gypsy and Traveller sites are predominantly residential and will be acceptable on previously developed land or in areas allocated primarily for residential development subject to all relevant policies within the Local Plan being met. However, it has been decided that no more gypsy sites should be identified within the Sandy Lane Area as the balance between the employment uses and gypsy pitch provision needs to be maintained. An allocation is proposed at Firs Yard in Wilden (MI/36). This site is already in use and the allocation will regularise its use for gypsy pitches.

Q6.2 (iii) Are the policies clearly written and unambiguous?

6.2.12 The Council agrees with the Inspector that the site policies could be made much clearer to ease understanding. It is proposed to change the individual site policy numbering to reflect the Plan chapter and the HELAA reference. For example, Policy 33.2 Cheapside AKR/2 would be renamed as Policy 33 AKR/2 Cheapside. This will avoid confusion as all other policies are referenced by chapter followed by a letter of the alphabet. However, there are too many individual site policies to follow this system. Using the site reference number as part of the policy name for all the site specific policies will simplify any cross referencing to the evidence base where the HELAA reference numbers have been used and also allow cross referencing to the initial Policies listing the sites in the tables at the start of each of the allocation chapters.

6.2.13 The Council has taken on board the suggestions raised by the Inspector in the Initial Questions (ED6) and will ensure that each individual site policy specifies the site size and quantity and type of development expected. Suggested amendments to individual site policies can be debated during the hearing sessions.

6.2.14 Documents SD11 and SD12 already set out several modifications proposed to the site policies. These amendments consider suggestions made by respondents during the Regulation 19 consultations together with those agreed through Statements of Common Ground (SD10a-n).

6.2.15 It should be noted that redevelopment of site MI/6 is now well advanced. The Inspector is asked to consider whether Policy 33.11 Steatite Way is still required.

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?

- 6.3.1 The 2018 Wyre Forest Viability Update (IFT06) considered the deliverability of the development sites in the emerging Plan together with updates to the NPPF and PPG. In May 2019, the viability section of PPG was changed in relation to the establishment of the Benchmark Land Value (BLV). Viability assessment now uses Existing Use Value (EUV) as the starting point. The updated PPG (10-010-2018072) states that the purpose of viability testing is to ensure that the aim of the planning system to secure maximum benefits in the public interest through the granting of planning permission has been met.
- 6.3.2 Different site typologies were tested – large brownfield, smaller brownfield, large greenfield, medium greenfield and small greenfield. These different typologies were developed having regard to the potential sites identified through the HELAA. The greenfield sites were also split between east and west of the River Severn. A total of 25 site typologies were modelled (see table 9.5 in 2018 Local Plan Viability Update (IFT06). Initial viability was tested with 30% affordable housing and a S106 contribution of £2000 per dwelling. This showed all the brownfield typologies to be unviable as they would not generate a Residual Value greater than the Existing Use Value. However, these types of site have consistently come forward in Wyre Forest and have delivered affordable housing albeit at reduced levels. Subsequently, testing showed that at 25% affordable, most site typologies would become more viable.
- 6.3.3 Viability Assessments consider infrastructure costs but do not allow for grant funding to help with such costs. It is possible that Registered Providers on sites in Stourport-on-Severn may be able to access additional grant funding to increase the delivery of affordable dwellings as they have been able to do elsewhere in the District in 2020.
- 6.3.4 The Council is confident that the proposed allocations will come forward as set out in ED11. These tables show the indicative 5-year phasing period for when the sites will be developed. Appendix F of ED10A shows the proposed housing trajectory for all the sites. This information is based on information received from landowners, agents and developers as set out in the Engagement Statement (ED12/A). Until planning applications are submitted for the sites, the capacity and timeframes for delivery can only be best estimates.
- 6.3.5 Of the allocations in Stourport-on-Severn, only MI/6 is on site. This Taylor Wimpey development known as Soapstones is providing 106 dwellings with only 14 affordable dwellings (all will be Affordable Rent). This former industrial site had additional decontamination costs which

meant that only 13% affordable housing was possible. An application for the redevelopment of Site AKR/20 Carpets of Worth has recently been submitted by Barratts. This has yet to be determined. Public consultation has been undertaken by developers on another two sites, AKR/14 Pearl Lane and at MI/38 School site Coniston Crescent.

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

6.4.1 In September 2020 the Town and Country Planning (Use Classes)(Amendment) (England) Regulations amended the Town and Country Planning (Use Classes) Order 1987 (UCO). Significant changes to the system of use classes were introduced. They include the reclassification of a number of uses. Class B1 which includes offices and light industrial are removed and incorporated within a new Use Class E which also includes previous use classes A1 (Shops), A2 (Financial and professional services), A3 (Restaurants and cafes), D1 (Non-residential institutions) and D2 (Assembly and leisure). Change of use to another use within Class E will be allowed without the need for planning permission.

6.4.2 The change to the Use Classes Order does not make changes to residential and therefore all of the housing allocated sites will be unchanged. A number of sites allocated in the Submission Plan are mixed use sites.

6.4.3 The Submission Plan lists the following allocations as mixed-use sites.

Site Ref	Site Description	Details of mixed use.
AKR/2	Cheapside	Employment conversion and residential.
AKR/7	Swan Hotel/ Working Men's Club	Site includes existing commercial and leisure. All new build is likely to be residential,
AKR/10	Queens Road Shops, Areley Kings	Residential and possibility of a shop.
AKR/20	Carpets of Worth	Scheme is now totally residential.

6.4.4 To protect the integrity of the Local Plan and the amenities of residents and other sensitive uses within the vicinity of employment developments amendments to the policies for mixed use sites could be made. This does not include the two sites that are 100% residential as there is no change to policy required. The policies for mixed use sites could be subject to a condition through planning permission:

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) Order 2015 (or any Order revoking or re-enacting that Order with or without modification), the

premises/building(s)/site(s) shall be used for shop/offices/research and development/light industrial and for no other purpose including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 2020, (or in any provision equivalent to that Class in any statutory instrument amending, revoking and/or re-enacting that Order with or without modification.

Reason: In order to define the permission in accordance with Policy 31.1 of the Wyre Forest District Local Plan and the National Planning Policy Framework.

6.4.5 Table of sites where Use Class is or is not listed.

Site Ref	Site Description	Policy changes
AKR/2	Cheapside	No use classes listed in policy; no policy change proposed.
AKR/7	Swan Hotel/ Working Men's Club	No use classes listed in policy; no policy change proposed.
AKR/10	Queens Road Shops, Areley Kings	No use classes listed in policy; no policy change proposed.

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?

- 6.5.1 There are two proposed residential allocations on Green Belt sites in Stourport-on-Severn. They are neighbouring sites immediately adjacent to the northern edge of the town with easy access to schools, shops and services within the town as well as employment areas in the nearby South Kidderminster Enterprise Park. There are good bus links from both sites. MI/38 is the site of a former school and its associated playing fields. The neighbouring site to the west, LI/11, was previously part of Burlish golf course. The western site is currently allocated as part of the Minster Road Outdoor Sports allocation. All of the former golf course is now back in the ownership of the Council.
- 6.5.2 Both of these proposed allocations were assessed as part of the Green Belt Review. The Green Belt Topic Paper (ED20) assesses both parcels as making a significant contribution to the Green Belt as they form part of the open land between the towns of Kidderminster and Stourport-on-Severn. Thus, any proposal to develop these sites will have to be fully justified and firm Green Belt boundaries established to protect the Green Belt from further encroachment.
- 6.5.3 The Burlish Golf Course proposals are set out in OS02. The overall vision is to create a new Country Park which will act as a green buffer between the two towns and provide informal leisure opportunities for the

surrounding communities. The central part of the former golf course is being turned into a meadow using the Grazing Animals Project run by the Council ranger service. A network of footpaths throughout the site has been created. Plans to create a new cycle link through the site linking the neighbouring Stourport High School with the Burlish Top Nature Reserve Car Park and hence on to Bewdley are well advanced. This is being actively promoted by the Wyre Forest Cycle Forum. The annotated plan in OS02 shows the proposed uses on the different parcels which make up the former golf course. It demonstrates that the release of site LI/11 will help provide compensatory improvements to the remaining land which will benefit the existing adjacent residential estates.

- 6.5.4 Site MI/38 is being promoted on behalf of Stourport High School which will use capital receipts from the sale of this site for housing development to fund essential repairs to the school. This is the most realistic means of raising the finance required as there are no grants now available from the Department of Education for school buildings as the High School is part of an academy trust covering several schools. The land is surplus to school requirements. Mitigation for the loss of the existing playing fields will be in the form of alternative sporting provision which will be available to the wider community. The northern boundary abuts allotments, the eastern boundary the High School and Primary School, the southern boundary existing housing with the western boundary adjoining the proposed allocation at LI/11. Policies 33.8 and 33.16 both suggest that access should be taken from the Kingsway adjacent to the allotments. Land to the north will continue to be safeguarded as Minster Road Outdoor Sports Area. Site Mi/38 is expected to be developed by 2026 whereas LI/11 is further forward in the Plan period. Detailed discussions are already taking place between the agent for MI/38 and the Council and a housing developer is involved.
- 6.5.5 The Council considers that there are exceptional circumstances that justify the release of both Site MI/38 and Site LI/11 from the Green Belt. S106 Contributions from LI/11 will be used to help implement the proposals for the neighbouring Country Park.
- 6.5.6 There are also two other sites in Stourport-on-Severn which are currently within the Green Belt. Both are existing uses which require land to be released from the Green Belt and allocated. Firs View Yard (MI/36) is very small scale and is visually enclosed and thus it is concluded that any harm to the Green Belt would be very limited. Any disbenefits are outweighed by the benefits of releasing this site as a small gypsy site. Site MI/18 is currently used for storage purposes as an extension to the Wilden Industrial Estate. It is considered that this use would have a minimal impact on the openness of the Green Belt and thus any benefits from its release from the Green Belt would outweigh the disbenefits.