

Wyre Forest District
Local Plan Examination
Matters and Questions:
Matter 6: Written Statement

Prepared by Fisher German LLP
on behalf of Melrose PLC



Project Title:

Parsons Chain, Stourport

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01 Introduction

- 1.1 These representations have been prepared on behalf of Melrose PLC in respect of their land interests at Parsons Chain, Stourport.
- 1.2 Parsons Chain is a brownfield site, allocated for mixed uses in the adopted Wyre District Council Development Plan. The site is also a proposed mixed-use allocation in the emerging Wyre District Council Local Plan. The adopted Core Strategy designates Stourport as a Large Market Town, in the second tier of the spatial hierarchy, behind only the Strategic Centre of Kidderminster



Figure 1: Google Earth extract outlining land at Parsons Chain, Stourport-on-Severn

- 1.3 These representations follow the order of the Matters and Questions as set out by the Inspector, in relation to Matter 6.

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

Matter 6.1- 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?

- 2.1 We fully support the Council in recognising Parsons Chain as a mixed-use allocation. The site is within the built framework of Stourport, the second most sustainable settlement in the District. Moreover, the site is brownfield land, which is currently underutilised. The NPPF puts great emphasis on the use of such sites for new development, with Paragraph 117 stating that “*strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land*” [our emphasis]. In the context of meeting housing needs and the need for greenfield sites to be brought forward, the effective use of brownfield land is something also constantly raised by local residents as a key issue. It is considered that the Plan is entirely justified, effective and in keeping with national policy in recognising the development potential of this site. Concern is however raised in respect of the proposed mix of uses, as detailed in response to Matter 6.2 (i).

Matter 6.2 (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?

- 2.2 Whilst we support the recognition of this site as a mixed-use allocation, given its location and status as brownfield land, this is a site which could come forward under the provisions of the emerging Plan and the Framework regardless. It is a sustainably located site within the built

framework of Stourport and is an under-utilised brownfield site.

- 2.3 Concerns are however raised in respect of the proposed policy wording. Policy 33.18 Parsons Chain MI/3 states:

This site is allocated for a mix of uses including C2 (care home), employment plus some residential

- 1) Land will be required to provide a new link from Hartlebury Road through to Worcester Road to relieve the bottleneck at the adjacent traffic island*
- 2) The Grade II listed house to the NW of the site should be buffered from any development by additional landscaping. Building heights should respect the setting of this Listed Building*
- 3) The railway embankment should be retained as an important green corridor and recreational route*

- 2.4 It is considered that the policy wording should be redrafted as below:

“This site is allocated for a mix of uses, including C2, residential and an element of employment generating uses”.

- 2.5 It is not clear why the Council have included the phrase ‘some’ in respect of the level of residential development; this is not consistent with other similar proposed allocations in Stourport. For example, for Cheapside (AKR/2), the policy states *“Proposals should provide for a mix of uses to incorporate both residential and an element of business and/or commercial uses.”* For Swan Hotel/Working Men’s Club (AKR/7), the policy states *“Proposals for this site should provide for a mix of uses including residential, commercial and leisure”.* Former Carpets of Worth (AKR/20) the policy states *“Proposals should provide for a mix of uses including residential, with the potential for community facilities”.* There are also a number of brownfield sites where the allocations are now purely for residential development, where no employment provision has been sought at all. This includes sites which are currently within designated employment areas. Such sites include;

- Queens Road Shops (AKR/10)
- Baldwin Road (MI/5)
- Steatite Way (MI/6)
- Land at 3 Sandy Lane Titton (MI/11) (currently a designated employment site)

- 2.6 Whilst this may seem a minor point, it is in our opinion imperative that there can be no confusion in respect of the policy expectations of the site. As written, the policy reads as though residential

development should be subservient to employment uses on site. There is no evidence to justify such a requirement, and this is not consistent with other similar sites in Stourport. Unrealistic site expectations set out within the proposed policy will prevent development being brought forward on a sustainable, brownfield site. Any such restrictions would be incompatible with the Framework. As such, without revision, this policy is considered unsound, in that it is not effective, justified, or consistent with National Policy.

- 2.7 The reasoned justification in respect of the Parsons Chain allocation advises that 1 hectare (ha) of employment land could be delivered on the site. Whilst this is not reflected within the policy, it is considered that the reference should be removed. The 1ha of employment land referred to is an arbitrary figure, with no real justification and risks setting unrealistic expectations for the delivery of the site, when an application is submitted. The level of employment delivery on site will be informed by detailed evidence (to include consideration to site viability and indeed a need for employment land in that location) and masterplanning, ensuring any submitted application for development remains viable. Again, no notional requirement is included in the reasoned justification for the other comparable proposed allocations e.g. Cheapside.
- 2.8 In the context of the above, it is worth noting that the Council are over providing against the employment land requirement by 6.21ha. If employment uses are excluded from the proposed policy wording, the Council will still have an over provision of circa 5.21ha of employment land. This would provide the Council just under a 20% buffer, which would, in our opinion, provide adequate choice and competition. The removal of reference to the delivery of 1ha of employment land on this site will not therefore unduly impact the wider strategic delivery and distribution of employment land, needed to deliver the Plan's aims and objectives, but would instead assist the Plan in meeting its C2 and C3 housing needs.
- 2.9 The existing site-specific policy which is contained in the Wyre Forest District Council *Site Allocations and Policies Local Plan 2006-2026* (Adopted July 2013) includes criterion vii, which sets out the circumstances wherein a residential only scheme would be acceptable, linked to financial viability. It is disappointing that despite a recognition of the site viability constraints, this is not reflected in any way in the emerging policy.
- 2.10 Whilst there are elements of the existing policy (i.e. the requirement for the implementation of the Stourport Relief Road) which prevented the site being brought forward under the adopted policy,

the general principle of criteria vii is supported and could be reflected in the emerging policy. Additional policy wording as below would be supported in the emerging policy:

“Proposals involving solely residential use will be considered subject to robust viability assessment and proposals not undermining the role of adjacent uses”.

- 2.11 Whilst viability work to support a future planning application is ongoing, it is clear that given the site’s status as brownfield land, in an area with difficult values that it is very unlikely any scheme will be viable unless sufficient levels of higher value residential uses are able to be delivered as an integral part of any application. As such, the policy must be written in a way which enables a viable scheme to be brought forward.
- 2.12 It is also worthy of note that there is a commitment to deliver a C2 Care Home on the site. Such institutions are not only residential, but they are also employment generating in their own right. As such, whilst there may be a slightly lower level of traditional employment uses delivered on site , the overall level of employment provided may be more than comparable. The provision of C2 is also an identified need, and as such the Council should ensure sites are able to deliver.
- 2.13 Looking at the Policy criteria itself, significant concern is raised in respect of first criterion of the proposed policy. This states that *“Land will be required to provide a new link from Hartlebury Road through to Worcester Road to relieve the bottleneck at the adjacent traffic island”*.
- 2.14 Such as scheme is not referenced in the Council’s Transport Evidence document (June 2019) or the Plan’s supporting IDP (June 2019). The need for a new link-road through the site is not included in the ELR either, in reality the ELR actually states that *“the site can be accessed via the A4025 and Hartlebury Road (B4193)... There are no known barriers to delivery of the site except possible contamination”*. Whilst delays at the traffic island are referenced in the Transport Evidence at 3.1.5, there is no proposed mitigation, and certainly none which require the site to facilitate this. The Transport Evidence Document does however refer to schemes which have already implemented and which have improved the queues at the junction.
- 2.15 It is unclear how such a Link Road, as sought within the proposed policy, would improve traffic measures and it seems that this requirement is simply a remnant of the now dropped Stourport Relief Road (SRR), which was to follow the line of the former railway; there is certainly no mention of it in the supporting evidence to the Local Plan. **Given the lack of justification for such a link road,**

it is requested that this requirement is deleted from the site-specific policy. As submitted, the policy is not sound, as it is not justified or consistent with national policy.

- 2.16 Clearly, any submitted application will need to satisfy the nationally established requirements for new development in respect of transport, as set out in the NPPF, and to satisfy this, a link through the site may be needed. This however will be established by detailed site-specific evidence. Given the site's location within the built framework of Stourport, near to the town centre, employment, services, and higher-frequency bus routes, it is considered there will be a lower car dependency on this site than other site allocations, such as the Green Belt release sites on the edge of the town.
- 2.17 In respect of the second criterion, whilst we agree that any proposals submitted will need to have due regard for the listed building to the north-west corner of the site, we consider 'additional landscaping' does not necessarily represent the best form of mitigation, which could indeed be delivered through design. It is considered that the criterion should be reworded to state "The Grade II listed house to the North West of the site should be considered as part of any development scheme, with consideration given to building heights on parts of the site".
- 2.18 For the avoidance of doubt, the following changes are sought to Policy 33.18 Parsons Chain MI/3:
Policy 33.18 Parsons Chain MI/3

This site is allocated for a mix of uses including C2 (care home), ~~employment plus some residential~~ **and an element of employment generating uses.**

- ~~1. Land will be required to provide a new link from Hartlebury Road through to Worcester Road to relieve the bottle neck at the adjacent traffic island~~
1. The Grade II listed house to the North West of the site should **be considered as part of any development scheme, with consideration given to building heights on adjacent parts of the site**
2. The railway embankment should be retained as an important green corridor and recreation route
3. **Proposals involving solely residential use will be considered subject to robust viability assessment and proposals not undermining the role of adjacent uses.**

Matter 6.3 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?

- 2.19 As referenced above, we are concerned that unless the site-specific policy in relation to Parsons Chain is sufficiently flexible, and reflects the amendments proposed within this statement, there will be issues with the delivery of this site due to viability.
- 2.20 Notwithstanding this, we do consider Parsons Chain to be viable, subject to sufficient flexibility in the policy wording, as highlighted in response to Matter 6.2(i). Whilst more detailed viability work is currently being undertaken in support of a planning application, initial work has set out that, subject to sufficient provision of residential housing, a mixed-use scheme inclusive of a care home and some employment uses is viable.
- 2.21 For the reasons set out in response to Matter 6.2, a change to the policy wording is required to ensure that the Plan is consistent in the way it treats similar sites, such a change to the site's policy wording will assist in ensuring a viable scheme can come forward.

Matter 6.4 Regarding the changes to the Use Classes Order in September 2020, are any modifications required for the soundness of the allocation policies?

- 2.22 No, it is considered the Council have used the term employment uses deliberately, rather than what would have been B-class uses at time of submission. Employment uses cover a broader spectrum of uses, and whilst it could be argued that B-Class would still be appropriate for the site, this would rule out a number of potentially suitable uses which are now within E-Class.
- 2.23 There are no issues with soundness over the use of the term employment in respect of the Parsons Chain site, and it is considered to be a more favourable wording than tying the site to specific use class orders, in that it offers inbuilt flexibility. As such, no change to the policy is recommended in respect of the changes to the Use Class Order.