

SUBMISSION – MATTER 6

OWL HOMES

PARTICIPANT REFERENCE - 1230017

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

6.0.1 This Matter Statement is submitted on behalf of Owl Homes who have an interest in Site WA/BE/5 (Habberley Road, Bewdley) which has a draft allocation for a minimum of 35 dwellings. Owl Homes are progressing proposals for the Site and submitted a pre-application enquiry to Wyre Forest District Council on 13th November 2020. An initial response was provided on 2nd December and a meeting with Officers is scheduled for 16th December 2020.

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 Policy 6.1 sets out a housing requirement of 5,520 net additional dwellings over the Plan Period, or a minimum of 276 dwellings per annum. This requirement was informed by Objectively Assessed Housing Needs Studies according to the Site Selections Paper (SSP01), the latest being published in October 2018 (HOU01). As set out in the Settlement Hierarchy Technical Paper (SH01) and expressed in Policy 6B of the Submission Local Plan, the District's development will be concentrated in the three most sustainable settlements within the District: Kidderminster, Stourport-on-Severn and Bewdley. In accordance with our response to Matter 3, this approach is fully supported.

6.1.2 The process to identify the sites allocated in the Submission Local Plan (SD01) is explained in the Site Selections Paper (SSP01). Following the Call for Sites and the Housing and Economic Land Availability Assessment (HELAA) for which sites were identified, an extensive evidence base was commissioned including a Green Belt Review (GB01), Strategic Flood Risk Assessment (FR01 and FR02) and Water Cycle

Study (FR03), together with an Infrastructure Delivery Plan (IFT01) and Viability Study (IF06). A Sustainability Appraisal (SD04) looked at all the sites in the HELAA to identify suitable sites for potential allocation.

- 6.1.3 Table 3.8 in the Sustainability Appraisal (SD04) sets out the grading system applied to candidate sites with Table 5.2 of the Appraisal setting out each site put forward in the HELAA against the grading system. This determines whether development would have a positive or negative impact compared to the current situation, on aspects including proximity to local services and facilities and Green Belt impact. Each site is then either ticked or crossed based on the grading system to give its collective 'overall impact' and potential suitability for allocation in the Local Plan.
- 6.1.4 We consider that the methodology provides a robust approach to site selection, considering potential constraints to development and deliverability, as well as how each site will meet the objectives and spatial strategy of the Plan. The methodology has been applied consistently, with each submitted site having been assessed using the same method and criteria, ensuring fairness and clarity.
- 6.1.5 In respect of Land at Habberley Road, Bewdley, Sustainability Appraisal Appendix B: Site Appraisals (SD04a) shows how the methodology was applied to the Site individually. There were not considered to be any 'major negative' impacts compared to the current situation and was one of only two sites in Bewdley assessed as such.

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

- 6.1.6 Land at Habberley Road, Bewdley is one of four allocations within or on the edge of Bewdley, as set out in Policy 34. Three of the allocations are proposed to be removed from the Green Belt. It is considered that exceptional circumstances for releasing Green Belt land for development has been fully evidenced and justified through the Submission Local Plan and Green Belt Review, supplemented by the Green Belt Topic Paper, and is in full accordance with the National Planning Policy Framework (NPPF).
- 6.1.7 As set out in Table 5.2 in the Sustainability Appraisal (SD04), there were 11 sites in Bewdley (including WA/BE/5) in total appraised by the grading system. Sites were discounted for a number of reasons, including, but not limited to: biodiversity and geodiversity, negative impact on the historic environment, landscape harm, vehicular access, and local amenity and public transport accessibility. Several sites were not

taken forward as they did not adjoin a settlement boundary or were at risk of coalescing Bewdley with another settlement.

6.1.8 As detailed above, the Site at Habberley Road, Bewdley, is not considered to have any 'major negative' impacts when assessed against the criteria within the Council's Sustainability Appraisal. It is one of only two sites in Bewdley not to have any major negative impacts. It is abundantly clear from reviewing Table 5.2 of the Sustainability Appraisal why the Site was selected for a housing allocation in favour of other submitted sites. This evidence is supported further through the technical work undertaken by Owl Homes in respect of the Site at Habberley Road which has been submitted to the District Council as part of the request for pre-application advice and is summarised in the Vision Document for the Site at Appendix A to this Statement.

6.1.9 The Council's approach to allocating specific sites is clear and transparent, and considers an array of social, environmental and economic factors. Sites such as Land at Habberley Road, Bewdley, have been allocated due to their sustainable locations, in accordance with the spatial strategy for the District, and their ability to help meet the District's housing requirements whilst supporting the Submission Local Plan's vision, aims and objectives.

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?

6.1.10 Paragraph 23 of the NPPF sets out that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address development needs, in line with the presumption in favour of sustainable development.

6.1.11 Paragraph 136 of the NPPF sets out that Green Belt boundaries should only be altered through exceptional circumstances, or through the preparation or updating of plans. As the latter is pertinent in this case, all other reasonable options for meeting its identified need must first be examined. The entire Green Belt cover within the District has been tested through a review against the five purposes of the Green Belt set out at Paragraph 134 of the NPPF (GB01, GB02, and GB02a). Whilst the development of brownfield land is a priority for the Plan and 49% of the District's housing requirement is to be delivered on brownfield land over the Plan Period, exceptional circumstances have been demonstrated to release land from the Green Belt. These exceptional circumstances are set out in the Submission Local Plan and the Green Belt Topic Paper

(ED20) and are explored further in our response to Matter 3.

6.1.12 The Submission Local Plan is considered to be fully consistent with national policy in respect of its approach to allocating sites for Green Belt release to meet its development needs, the approach to housing delivery, the prioritising of brownfield land where possible and the approach to the duty to cooperate. As such, it is entirely appropriate and necessary and in full accordance with national policy for Green Belt sites such as Habberley Road, Bewdley to be released from the Green Belt and allocated for residential development. Furthermore, Habberley Road, Bewdley is located with existing dwellings on two sides and the A456 to the south. As such, there is the ability to create a new Green Belt boundary on the eastern site boundary which will endure beyond the Plan Period due to the presence of a hotel on that adjacent land and supplementary landscaping along the boundary of the Site. This is in full accordance with Paragraph 136 of the NPPF.

6.1.13 Table 3.0.1 of the Submission Local Plan sets out the Vision for the District to 2036. It states that Kidderminster will be a focus for brownfield regeneration and Stourport-on-Severn and Bewdley will continue to provide facilities to support the local community and visitors. The Submission Plan's objectives include addressing housing needs to meet the requirements of existing and future residents and that the economic development of the area is supported; and protecting the Green Belt but identifying strategic Green Belt release to meet development needs. 6.1.14 Developing Land at Habberley Road, Bewdley also accords with the Submission Local Plan's vision and objectives. The site adjoins Bewdley's settlement boundary, one of the District's three main towns and is located in a sustainable location with links to the existing transport network, as is acknowledged in the Sustainability Appraisal.

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 Paragraph 35 (b) of the NPPF defines 'justified' with regards to the examination of local plans and spatial development strategies as:

"an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence".

- 6.2.2 As set out in our response to Matter 3, the need for the Council to undertake a Green Belt Review and release Green Belt land for housing development is entirely justified when compared to the alternative of not undertaking a Green Belt Review given the considerable proportion of Green Belt land within the District. In addition, the Council's approach to its spatial strategy is also considered to be fully justified compared to the alternative of not directing the majority of growth to the District's most sustainable settlements. As such, the allocation of Habberley Road, Bewdley is considered to be justified in this regard.
- 6.2.3 In terms of the number of dwellings to be delivered at Habberley Road, Bewdley, draft Policy 34 of the Submission Local Plan sets out a minimum allocation for up to 35 dwellings. As detailed in our response to Matter 3, this represents very low density development at approximately 32 dwellings per hectare. However, following the preparation and review of extensive technical work, Owl Homes are comfortable that 44 dwellings can be achieved on the Site at a medium density development of approximately 40 dwellings per hectare. This also supports the Council's latest trajectory at Appendix F of their April 2020 Five Year Housing Land Supply Report (ED10A) which includes 44 dwellings on the Site. This will help contribute to the District's housing needs and also accords with Paragraph 122 of the NPPF which sets out that planning policies and decisions should support development that makes efficient use of land. As such, this approach is considered to be in accordance with national policy and fully justified when considered against the alternative of not making efficient use of land through low density development.
- 6.2.4 We note that draft Policy 8B (Affordable Housing Provision) of the Submission Local Plan requires a minimum of 25% affordable housing on sites of 10 or more homes. The Vision Document for the Site at Habberley Road (Appendix A) confirms that this requirement can be met on site, as well as the delivery of a range of dwelling type, size and tenure.
- 6.2.5 The proposals for the Site include provision for a large area of public open space and landscaping to the south of the Site and landscaping throughout, including the provision of a new landscaped edge to the Green Belt along the eastern boundary. This will ensure the protection of remaining Green Belt to the east and accords with Chapter 13 of the NPPF. It also corresponds with draft Policy 34.4 (3) which sets out

that well established trees and hedgerows should be retained and extended north to connect with the hedgerow along the B4190 and provide screening to the development from the adjacent hotel grounds. This requirement of the draft Policy is considered to be consistent with national policy and justified given the need to provide a new Green Belt boundary.

- 6.2.6 Vehicular access via Habberley Road meets the requirements of draft Policy 34 in the Submission Local Plan. This requirement is considered to be consistent with national policy and justified, given that it is the most suitable location for access. Pedestrian accesses will connect to the north and south of the Site to the existing built form ensuring cohesion and integration with the existing built development in accordance with national policy.
- 6.2.7 The proposed development will meet the high-quality design standards set out in draft Policy 11A and will integrate effectively with its surroundings whilst creating a new Green Belt edge.
- 6.2.8 As part of the pre-application enquiry submitted to Wyre Forest District Council, Owl Homes submitted a number of supporting technical reports. Details of the findings of these technical reports are included within the Vision Document for the Site at Appendix A. Initial feedback from the District Council does not highlight any significant issues that would preclude the development of the Site.
- 6.2.9 As well as being justified and in accordance with national policy, Paragraph 35 of the NPPF requires policies to be 'effective', which means deliverable over the Plan Period. The technical information submitted demonstrates that the Site at Habberley Road is deliverable. The early preparation of these technical reports and early engagement with the District Council through the pre-application process and will facilitate the faster delivery of the Site on adoption of the Plan to the meet the housing needs of Bewdley and the District. Furthermore, the Site is in the control of Owl Homes, who are a house builder and well positioned to take the Site forward once it is released from the Green Belt and allocated for residential development in the adopted Plan.
- 6.2.10 In conclusion, both the principle of releasing the Site at Habberley Road, Bewdley from the Green Belt and allocating it for residential development, along with the content of draft Policy 34.4 of the Submission Local plan are considered to be fully consistent with national policy, justified and effective, in accordance with Paragraph 36 of the NPPF.

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

6.2.11 No comment.

(iii) Are the policies clearly written and unambiguous?

6.2.12 In respect of Land at Habberley Road, Bewdley, it is considered that draft Policy 34.4 is clear and unambiguous.

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 In respect of Land at Habberley Road, Bewdley, the submitted pre-application enquiry and preparation of technical work submitted on the 13th November 2020 reinforces the deliverability of the Site. The Site is in the control of Owl Homes, a housebuilder. Owl Homes are committed to submitting a full planning application on the Site as early as practical following adoption of the Local Plan and subsequent release of the Site from the Green Belt.

6.3.2 As set out in representations to previous stages of the Plan review, and supported by technical reports as part of the pre-application enquiry, there are no technical constraints which would prevent the development being delivered at the earliest opportunity, subject to the Site's release from the Green Belt.

6.3.3 In respect of the housing trajectory for Land at Habberley Road, the Council's April 2020 Five Year Housing Land Supply Report at Appendix F (ED10A) identifies that 14 dwellings will be delivered on the Site in 2021/22 and 30 dwellings will be delivered in 2022/23. Subject to the release of the Site from the Green Belt, this trajectory is considered to be achievable. This is particularly in light of the advanced stage of preparation of a Full planning application on the Site, as detailed above.

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

6.1.4 No comment.

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 The Submission Local Plan and Green Belt Topic Paper (ED20) set out that there are exceptional circumstances to require the release of Green Belt land within the District to accommodate new development. The Council's commitment to meeting its development needs in full cannot be achieved in a sustainable manner without Green Belt release. Notwithstanding this, our response to Matter 3 also makes it clear that Green Belt release does not need to be considered as a last resort for meeting housing needs in order for exceptional circumstances to be demonstrated.
- 6.5.2 Draft Policy 7A in the Submission Local Plan takes a positive approach to undertaking a Strategic Green Belt Review in accordance with the NPPF and the District's settlement hierarchy. It proposes to release Green Belt to support the vitality and viability of settlements otherwise constrained by Green Belt. Bewdley is one such settlement, and as one of the District's Main Towns, is a sustainable location and a focus for meeting the District's housing needs.
- 6.5.3 In light of the above, and in accordance with our response to Matter 3, it is considered that exceptional circumstances exist to release Green Belt for development and, more specifically, to release land at Habberley Road, Bewdley. It has been demonstrated that the Site is one of the most suitable sites in Bewdley for development through the site selection process and it is clear the Site is well contained on all sides by existing built form and can create a new permanent boundary to the Green Belt to the east. As such, the release of the Site at Habberley Road, Bewdley from the Green Belt for development is fully justified.

Q6.6. (i) With reference to Policy 7B for the reserved housing sites (a-d) that are defined as Areas of Development Restraint in the adopted development plan, is there adequate justification for not releasing them for development in this Plan, while removing other sites from the Green Belt for development during the Plan period?

- 6.6.1 No comment.

(ii) Is there adequate justification for the identification of Lawnswood, Cookley (Policy 7B(e)) as a reserved housing site?

6.6.2 No comment.

(iii) Are Policy 7B and the reasoned justification in paragraphs 7.17-7.21 consistent with one another and with national planning policy on safeguarded land?

6.6.3 No comment.

APPENDIX A

**Habberley Road,
Bewdley Vision Document**

LAND AT HABBERLEY ROAD BEWDLEY

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**BARTON
WILLMORE**

1. The Vision

// An attractive well-connected residential development of high quality homes, set within a strong landscape setting, within walking distance of local amenities and services. //



Creation of high quality streets for all

Through the design and consideration of nodal spaces and key landmark buildings, the proposal will create a journey through a high-quality streetscape to enhance the character and experience of a new residential community.



A development which increases connectivity and enhances legibility

As part of the development, a new pedestrian and cycling route will be created through the site, improving connectivity and links for the community and surrounding area.



A development which sits within the local landscape and responds to the local character

Existing and proposed planting will be used within the development to enhance the setting and character of the development. A new area of public open space within the site will be created, in addition to soft landscaped boundaries to help the site knit into the local fabric and create a new defensible boundary to the Green Belt.

2. Introduction

The Vision Document has been prepared by Barton Willmore on behalf of Owl Homes. Owl Homes is working with landowners to support proposals for residential development at Habberley Road, Bewdley, Worcestershire.

The purpose of this document is to support the promotion of the site to accommodate residential development and associated open space. A pre-application enquiry was submitted to Wyre Forest District Council on the 13th November 2020 which included the submission of technical work. This document will help to inform the Local Plan Review Hearing Sessions and is submitted alongside Owl Homes' Matter Statements. The key aims and objectives of the document are to:

- Present a **vision and design framework** to guide and shape the proposals
- Review the site in the context of current **Planning Policy**
- Present an initial understanding of the **site and the local context**
- Present a summary of the **technical work** undertaken thus far
- Present the emerging **concept masterplan**, supported by an explanation of the **key design principles** that have informed it.



Site Location

The site is located off Habberley Road, Bewdley.

Bewdley is a small town and civil parish located in Worcestershire, situated 2 miles west of Kidderminster, 13 miles north of the Worcester and 19 miles south-west of Birmingham.

The site is located east of Bewdley between Habberley Road and Kidderminster Road with vehicular access onto the former. Habberley Road provides good connectivity from the site to the wider strategic road network; A456, A442 and A449 to Kidderminster and Birmingham, Telford, and Worcester respectively with onward connections available to the M5 and beyond.

The Site

The site area measures 1.6ha and is currently used for agriculture, comprising of two agricultural fields and is bounded as follows:

Northern Boundary: Habberley Road runs along the northern boundary with housing opposite.

Eastern Boundary: East of the site is the Mercure Kidderminster Hotel and Feel Good Health Club Bewdley with associated grounds.

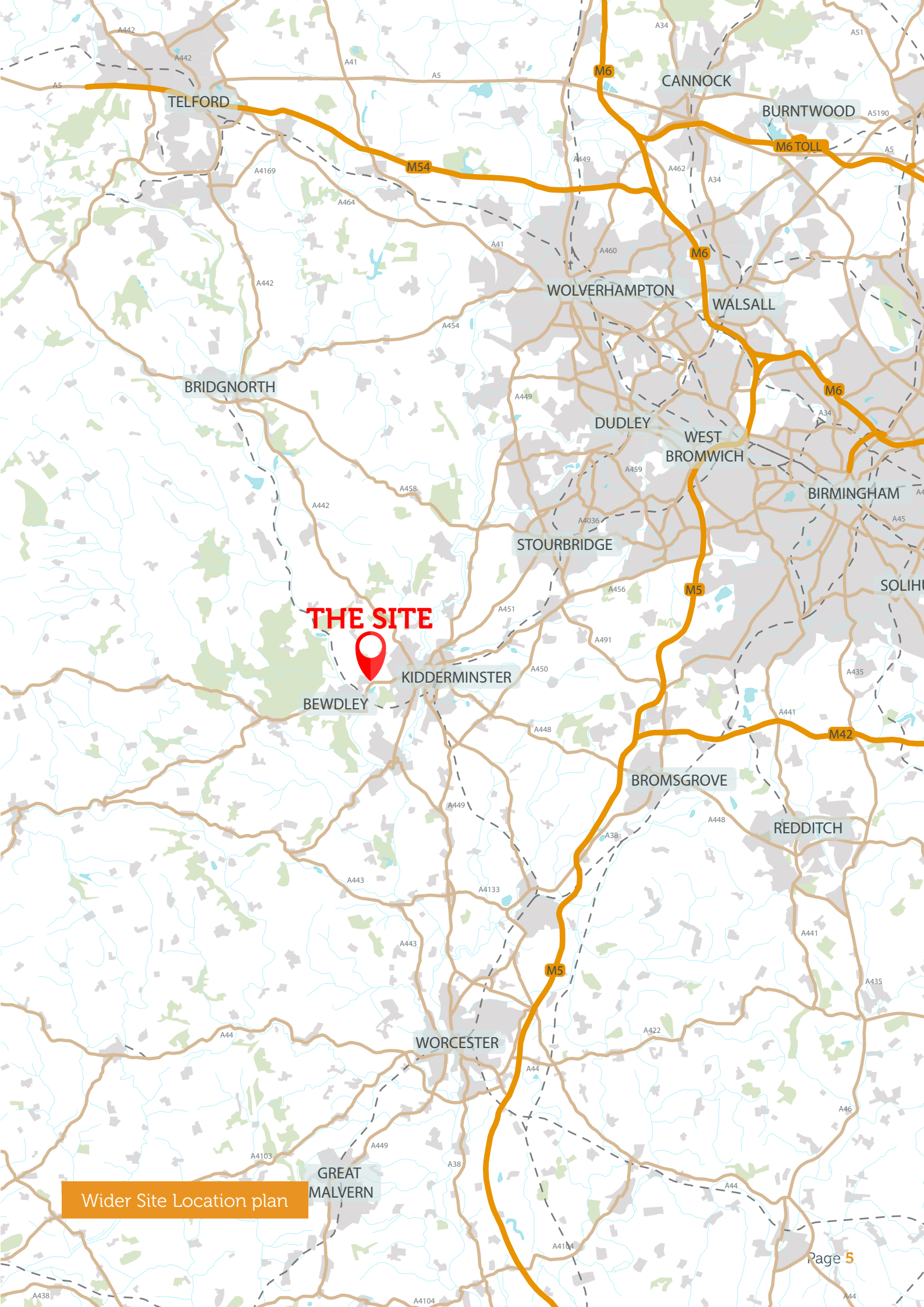
Southern Boundary: Kidderminster Road runs along the southern boundary with an existing dwelling to the south west corner.

Western Boundary: Existing houses on New Road with gardens backing onto the western boundary of the site.

Aerial Site Location plan



Site Boundary



THE SITE



KIDDERMINSTER

BEWDLEY

WORCESTER

GREAT MALVERN

CANNOCK

BURNTWOOD

WOLVERHAMPTON

WALSALL

DUDLEY

WEST BROMWICH

BIRMINGHAM

STOURBRIDGE

SOLIHULL

BROMSGROVE

REDDITCH

Wider Site Location plan

3. Planning Context

Local Planning Policy

The Development Plan in relation to this site comprises:

- Wyre Forest Core Strategy (2010)
- Wyre Forest Site Allocations and Policies Local Plan (2013)

The Wyre Forest Core Strategy was adopted in 2010 and sets out the broad strategy and vision for development within the District up until 2026 and identifies broad areas where new housing and employment development will be located. It identifies a requirement of 4,000 dwellings and 44 hectares of employment land to be provided over the Plan Period (2006-2026). It includes Strategic Policies such as identifying development locations (Policy DS01), Market Towns (Policy DS03) and seeking the provision affordable housing (Policy CP04).

The Site Allocations and Policies Local Plan sets out the sites allocated for development and the district's Development Management policies. It provides guidance with regard to parking provision (Policy SAL.CC2), water management (Policy SAL.CC7), development in the Green Belt (Policy SAL.UP1), open space and play provision (Policy SAL.UP4), providing opportunities for biodiversity and geodiversity (Policy SAL.UP5), principles of quality design and local distinctiveness (Policy SAL.UP7) and landscaping and boundary treatment (Policy SAL.UP9).

Emerging Policy

The Local Plan Review is ongoing and once adopted will set out the strategy and policies for the Plan Period of 2016-2036. It will be informed by recent national policy changes including the introduction of the standard method for calculating housing needs.

The Submission Plan sets out that there is a need for a minimum 5,520 dwellings to be provided over the Plan Period. The figure is not based on the 2014 Household Projects as this would have given a lower housing requirement and the Council wish to be more ambitious and promote growth within the District. It is accepted that Green Belt release is required to accommodate this housing requirement.

Examination Hearings are scheduled to commence on the 11th January 2021 and will run over a four week period. Adoption is thereafter anticipated for Spring 2021.

The site is shown in the emerging Plan as being removed from the Green Belt and allocated for 35 homes (Policy 34) (site reference WA\BE\5).

Draft Policy 8A sets out a suggested housing mix for market and affordable housing. It confirms that the greatest need for market housing is 2 bedroom and 3+ bedroom properties.

Draft Policy 8B sets a requirement for 25% affordable housing on sites in excess of 10 dwellings.

The policies of the emerging plan have informed the preparation of this vision document and will continue to do so as it evolves in unison with the council and other key stakeholders

The Bewdley Neighbourhood Plan is being prepared with the Pre-submission consultation having taken place in April 2018. It sets out the aspirations for Bewdley and sets out local design principles for new development. The next step will be the submission of the draft Neighbourhood Plan although the timetable for this is currently unknown.

Supplementary Planning Guidance

Design Guidance (2015)

This sets out the Council's approach to the design of development proposals focusing on securing a high-quality design. This guidance has informed the layout and design of the indicative layout included within this Vision Document.

Other Material Considerations

National Planning Policy Framework (NPPF) (2019)

The NPPF sets out the principles by which the new Local Plan will be produced and examined against. There are a number of key paragraphs in relation to the promotion of this site through the local plan process including:

- The need to identify land for the authority's whole area, including any needs which cannot be met in neighbouring areas (paragraph 65).
- The need to identify a sufficient supply of sites taking account of availability, suitability and likely economic viability (paragraph 67).
- The five purposes of the Green Belt (paragraph 134).

- Green Belt land should not be altered except where exceptional circumstances are fully evidenced and justified (paragraph 135) – for instance through the identification of a lack of capacity within existing urban areas.
- The plan maker's need to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development, including in discussions with neighbouring authorities (paragraph 137).
- When reviewing Green Belt boundaries, the need to promote sustainable patterns of development and how the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land (paragraph 138).
- The need to define Green Belt boundaries clearly (paragraph 139).

References to the relevant sections of the NPPF are included throughout this document and reference has also been made to further guidance provided within the Planning Practice Guidance.

4. Site Context

The site is located east of Bewdley and approximately 2 miles west of Kidderminster Town Centre. The site is within walking distance of Bewdley Town Centre.

Access & Movement

The site is accessed from Habberley Road. Habberley Road is a single carriageway, part of the B4190 between A456, Kidderminster Road and Habberley Lane, connecting Habberley to Bewdley.

There is potential for a pedestrian and cycle link to Kidderminster road in the south. An existing footpath runs from the site to Bewdley Town Centre.

The site is located within walking distance (0.9 miles / 18 minute) of Bewdley Town Centre facilities and services including schools, shops, healthcare facilities, pubs and leisure facilities. The site is also within walking distance of regular bus services to Kidderminster and Stourbridge. The nearest bus stop being just 130 metres (1 minute) walking distance from the proposed pedestrian access onto Kidderminster Road on the southern boundary of the site. Kidderminster Railway Station can be reached by a 10 minute car journey, which provides regular services to Worcester and Birmingham.

There are no Public Rights of Way (PRoWs) on or near to the site.

Public Transport

The closest bus stops to the site are located:

- » On Kidderminster Road, 130m to the south west serving the 2, 125, 291 and 292 routes.
- » On Trimpley Lane, 140m to the west, serving the 2 route.

Across all services there are buses running to/from Kidderminster and Stourbridge hourly in the daytime.

Summary of Existing Bus Services

Service	Route	Daytime Frequency
2	Kidderminster - Hales Park	Hourly
125	Stourbridge - High Town	Hourly
291	Kidderminster - Tenbury Wells	2 Hours
292	Kidderminster - Ludlow	2 Hours

Train Services

The closest national rail train station to the site is Kidderminster approximately a 10 minute drive away with regular services available via West Midlands Trains to Birmingham and Worcester.

There is also a volunteer-run heritage railway station in Bewdley, part of the Severn Valley Railway which runs between Kidderminster and Bridgnorth.

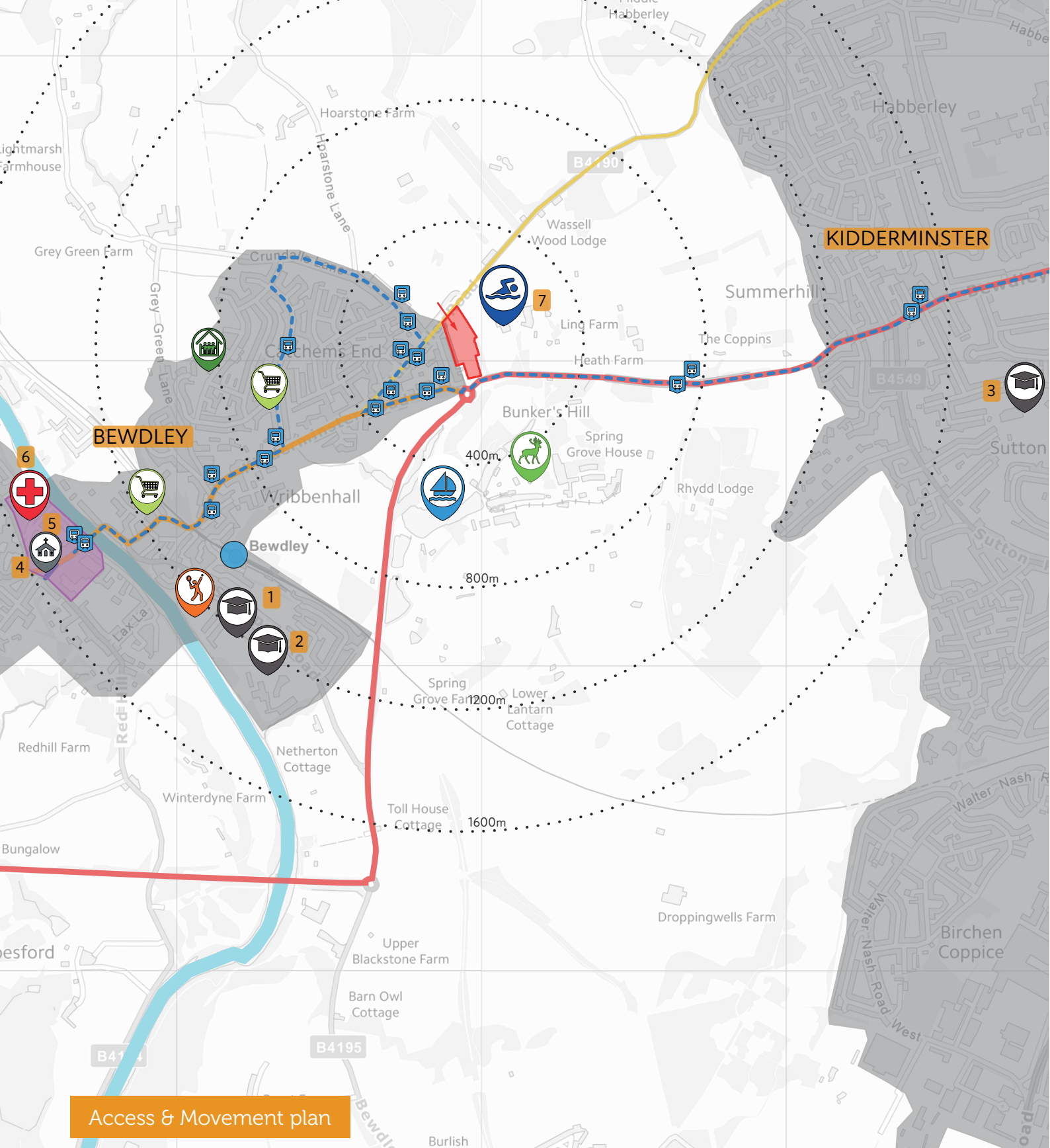


Local facilities & services

The site is located in the Wribbenhall area of Bewdley which has a number of facilities adjoining and within a 15 minute walk of the site. These facilities include a health club, hairdressers, small retail outlets, restaurants and public houses, a community centre and a safari park.



















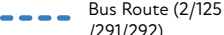



Further west of the site is the centre of Bewdley which offers further facilities including a primary and secondary school, supermarkets, medical centre and sports and leisure facilities within a 25 minute walk of the site.

Type	Description	Walking Distance (from site access)	Walk / Cycle Time
Education	Bewdley Primary School	1.6km / 1.0 mile	19 minutes / 6 minutes
	The Bewdley School	1.7km / 1.0 mile	21 minutes / 6 minutes
	St. Anne's CofE Primary School	2.6km / 1.6 miles	36 minutes / 16 minutes
	The Sutton Park Community Primary	2.1km / 1.3 miles	27 minutes / 9 minutes
Healthcare	Healthpoint Pharmacy, Bewdley	1.6km / 1.0 mile	20 minutes / 6 minutes
	Bewdley Medical Centre	1.9km / 1.2 miles	25 minutes / 8 minutes
	Murray Pharmacy, Bewdley	1.9km / 1.2 miles	25 minutes / 8 minutes
Food Retail	Springhill Stores	0.8km / 0.5 miles	10 minutes / 3 minutes
	Co-op Food	1.3km / 0.8 miles	15 minutes / 4 minutes
	Tesco Express	1.6km / 1.0 miles	19 minutes / 5 minutes
Sports and Leisure	Feel Good Health Club	0.3km / 0.2 miles	3 minutes / 1 minute
	Wribbenhall Community Centre	1.3km / 0.8 miles	15 minutes / 4 minutes
	Bewdley Tennis Club	1.5km / 0.9 miles	19 minutes / 5 minutes
	Bewdley Sports Centre	2.4km / 1.5 miles	31 minutes / 10 minutes
	Bewdley Rowing Club	1.8km / 1.1 miles	23 minutes / 7 minutes
	Bewdley Cricket Club	2.3km / 1.4 miles	29 minutes / 10 minutes



Access & Movement plan

LEGEND

	Site Boundary		West Midlands Safari Park		Bus Stops		Schools
	Primary Access		Bewdley Tennis Club		River Severn		1 - Bewdley Primary School
	Local Centre		Mini Supermarket		A456		2 - The Bewdley School
	- Mini Supermarket		Boating Lake		Habberley Road/B4190		3 - Sutton Park Community Primary School
	- Churches		Wribbenhall Community Centre		Kidderminster Road/B4190		Churhes
	- Public Houses		Bewdley Train Station (Volunteer run heritage rail)		Bus Route (2/125 /291/292)		4 - St Annes C of E Church
	- Post Office						5 - Elm Riverside Church
	- Pharmacy						Medical Facilities
	- Village Hall						6 - Bewdley Medical Centre
	Urban Area						Leisure Facilities
							7 - Feel Good Health Club Bewdley

5. Opportunities & Constraints

The findings from the initial site and context assessment, in addition to the technical reports have been evaluated to identify the emerging constraints and opportunities relevant to the development of the site.

The composite plan in this section presents the analysis of these elements, the qualities of the site and its immediate setting that provides the context for future development proposals. The positive features and opportunities on and around the site should be retained, enhanced and incorporated into the scheme where possible, to strengthen local distinctiveness

Key Opportunities

There is significant existing vegetation (hedgerows, trees and other planting) particularly along site boundaries which can be retained to add character both to residential areas and public open space.

There is an opportunity to create a new connecting route through the site onto Kidderminster Road, particularly for pedestrians, increasing permeability.

The site is in close proximity to nearby bus stops, a minute's walk from the site.

There are no heritage assets located within proximity of the site.

The site is located within Flood Zone 1.

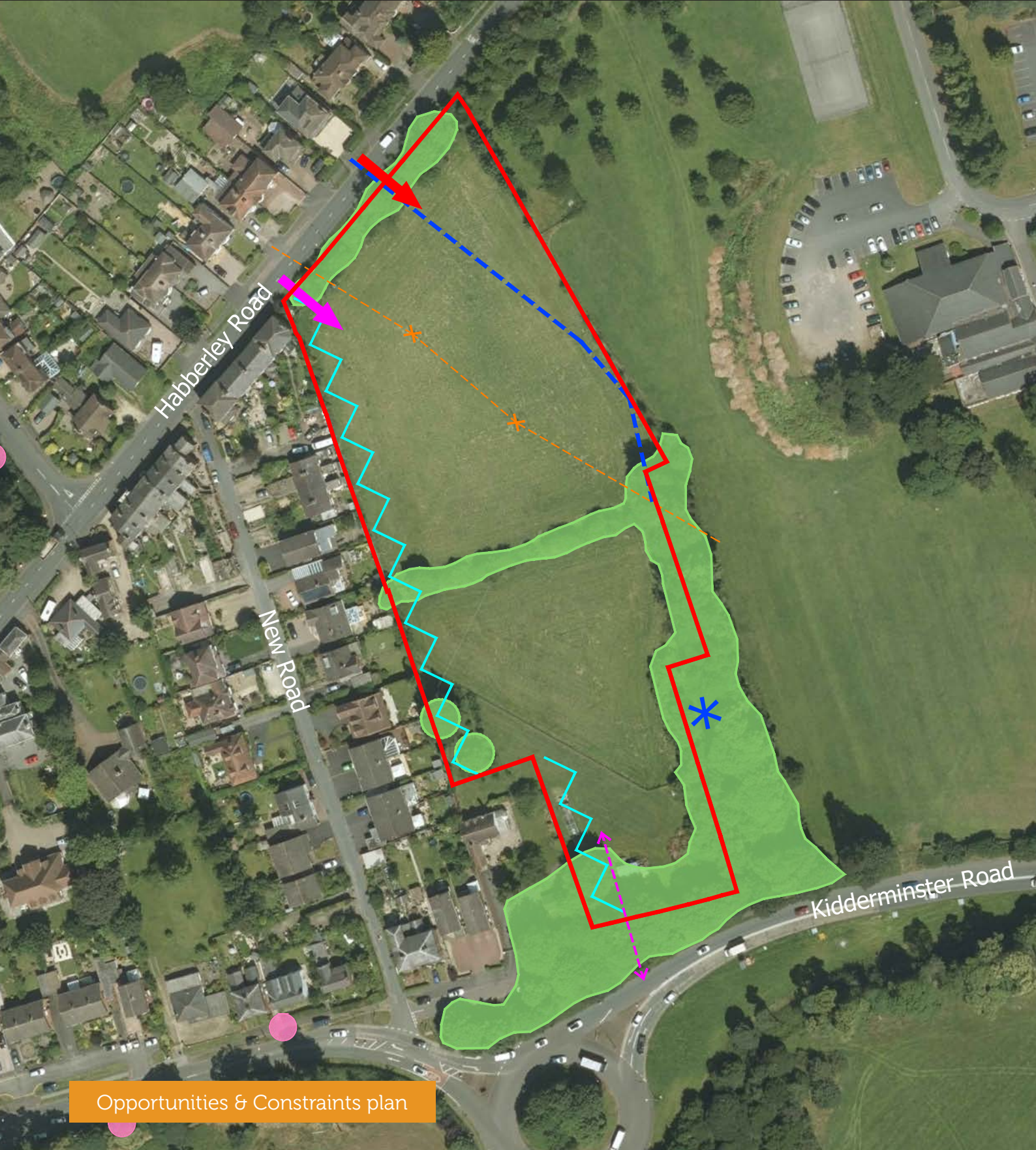
The site is flat with little to no elevational changes.











Key Constraints

Rear Gardens of properties along the western boundary should be backed onto.

Overhead powerlines will need to be considered or relocated.

A culverted watercourse running under the site will need to be accounted for and could help to inform the position of SUDS/attenuation.



	Site Boundary (1.60 Ha)		Proposed Pedestrian Access		Existing Landscape
	Proposed Site Access		Backs of Adjacent Properties		Sub Station
	Existing Site Access		Bus Stops		
	Existing Overhead Powerlines		Existing Culvert		

Access & Transport

Habberley Road is a single carriageway connecting Habberley with Bewdley. Access is to be provided onto Habberley Road where appropriate visibility splays can be achieved given the layout and width of the road. The Transport Statement (Ref. T20065/TS/01/Rev A) submitted as part of the pre-application enquiry concludes that satisfactorily vehicular access to the Site can be achieved and the proposed development would also be accessible by sustainable travel modes such as public transport, walking and cycling. Moreover, the Site is considered suitable for the scale and type of development proposed and is not forecast to give rise to severe traffic impacts.

Currently there is no footpath along the northern boundary of the site, however a footpath into Bewdley does run along Habberley Road up to the western boundary of the site. The proposal provides the opportunity to connect to this footpath enabling safe pedestrian access to the facilities in Bewdley.

The indicative layout of the proposal is designed around one main road with small cul-de-sacs leading off. A footpath can be provided connecting to the footpath to the south of the site along Kidderminster Road.

Flood Risk & Drainage

The site is entirely within Flood Zone 1 and therefore has a low probability of flooding (less than 1 in 1,000 annual probability). A Flood Risk Assessment and Drainage Strategy (November 2020) sets out that there is no risk of flooding from nearby fluvial sources and any surface water flood risks will be omitted due to the change in topography and the incorporation of a flood alleviation area.

In order to manage water on site, the proposal has been informed by the provision of Sustainable Urban Drainage Systems including an attenuation pond. This is set out in the Utilities and Drainage Survey (September 2020) and Drainage Strategy Plan (Drawing No. 2). This method of drainage is supported by local and national planning policy.

Landscape

There are no known statutory or non-statutory landscape designations on the site or adjoining it.

The landscape led approach to the development of the site ensures the proposal integrates well with the built up area to the west and the more rural character to the east and south.

The proposal seeks to respond to Policy requirements to retain and enhance existing landscaping and provide open space on site. This landscape led approach has resulted in a high quality development proposal which respects the character of the surrounding area and provides landscape enhancements.

Trees

The site features a number of mature trees and hedgerows that make up the north, south and part of the eastern boundary of the site and a TPO covers land adjoining the site to the east. Where possible the existing trees and hedgerow have been retained, in line with the technical work submitted; Survey of Existing Trees (Drawing No. C-1810-01, September 2020) and Tree Survey Report (Ref. BS5837:2012, May 2020). All trees to be retained should be protected by barriers and along with ground protection, should be regarded sacrosanct and therefore not to be removed or altered within prior consultation of an arboriculturist and approval of the local planning authority.

Green Belt

The site is presently within the Green Belt however is proposed in the emerging Local Plan to be removed from the Green Belt.

The site benefits from existing defensible boundaries utilising Habberley Road, Kidderminster Road, existing built development and the strong landscape buffer existing to the east. There is potential to strengthen any gaps in this buffer through additional landscaping.

Exceptional circumstances have been demonstrated to release the site from the Green Belt. Wyre Forest District is heavily constrained by Green Belt and would not be able to meet its housing target without Green Belt release. The site is located on the edge of Bewdley which is identified as one of the most sustainable settlements in the District.

Ecology

There are no known statutory or non-statutory designated sites of nature conservation interest located within or adjoining the site boundary. A SSSI, Devil's Spittlefield SSSI, is located 0.6km from the site buffered by extensive Green Belt countryside.

The site does not have any existing buildings and the majority of the mature landscaping is proposed to be retained. Therefore, it is anticipated that the proposal would have limited impact on ecology and through proposed landscaping enhancements will provide opportunities for net gains to biodiversity.

Phase I and II Site Appraisals, and a Preliminary Ecological Appraisal (September 2020) been undertaken and show the site to be suitable for residential development. In addition, a Bat Activity Survey Report and Ground Level Tree Assessment Report (November 2020), Badger Setts Monitoring Report (November 2020) and Reptile Presence/Absence Survey Report (November 2020) have been undertaken. These surveys do not identify any barriers to development. Further survey work will be undertaken to support the proposal with appropriate mitigation where required during the relevant survey seasons.

Heritage & Archaeology

The site is not located adjoining or within the setting of a Conservation Area. The site does not contain any Listed Buildings nor does it adjoin any Listed Buildings. A Grade II Listed Building is situated to the south east of the site however extensive landscaping proposed would ensure that there would be no harm to its setting.

The site has no known historical connections and as such no archaeological remains of historical value are expected. Should any be found on site, appropriate action would be taken such as the instruction of an appropriately qualified archaeologist to survey the site.

Social Infrastructure

The site has the opportunity to enhance its connection with the services and facilities of Wribbenhall and Bewdley through the provision of connecting footpaths and access to public transport. This will increase accessibility to the extensive community facilities and services available there.





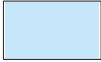

6. The Proposals

Key Guiding Design Principles

The plan for the site has been informed by the vision, site analysis and identified constraints and opportunities. The plan shows the key design principles which underpin the development of the site, as set out below (numbers correspond to the plan opposite):

- ① Primary Site Access via Habberley Road - New access proposed onto Habberley Road includes the extension of the pavement to the south.
- ② SUDs Feature
- ③ 'Nodal' space defined by change of surface - Key central space which informs legibility and movement through the site.
- ④ Landscaped Buffer - Knits the development into the surrounding landscape whilst maintaining green views and privacy for both existing and proposed dwellings and creating a new defensible boundary to the Green Belt.
- ⑤ Apartments with secure parking courtyard - Part of the developments commitment to deliver a range of dwelling types and tenures.
- ⑥ Dual sided residential street - In conjunction with dual aspect homes the street will be secure, well overlooked and communal.
- ⑦ New area of Public Open Space & Play Area - This area of open space will serves both the existing and new residential communities.
- ⑧ Adjoining Buildings
- ⑨ Pumping Station

Legend

*	Key 'Nodal' Buildings/Dual Aspect
	Site Boundary
	Primary Access
	Public Open Space and Landscaping
	Infrastructure
	Attenuation Area
	Private Garden



Private Dwellings		
Type Ref	No. Beds	No. Units
Thompson	4	5
Clifford	4	2
Greenwood	3	2
Worsley	3	1
Guscott	3	5
Healey	3	2
Dawson	3	9
Bracken	2	3
Love	2	2
Sub Total		31

Affordable Dwellings		
Type Ref	No. Beds	No. Units
Dawson	3	2
Bracken	2	3
Aparts	2	8
Sub Total		13

Site Layout Plan

7. Development Benefits



Creation of high quality streets for all

The development will deliver approximately 44 new homes and through the consideration of nodal spaces and key landmark buildings, the proposal will create a journey through a high-quality streetscape to enhance the character and experience of a new residential community.



A development which increases connectivity and enhances legibility

As part of the development, a new pedestrian and cycling route will be created through the site, improving connectivity and links for the community and surrounding area.



A development which sits within the local landscape and responds to the local character

A new area of public open space within the site will be created, in addition to soft landscaped boundaries to help the site knit into the local fabric and create a new defensible boundary to the Green Belt.

8. Deliverability

Owl Homes are a modern, privately-owned property developer, specialising in the delivery of sustainable high-quality residential dwellings throughout the Midlands.

Passionate about design and quality of construction, Owl Homes have the skills, experience and creative flair to blend traditional values with the latest trends and practical modern day living. Owl Homes carefully consider the design, specification and construction throughout the delivery of all new homes. Owl Homes are committed to submitting a full planning application as early as practical following adoption of the Local Plan and subsequent release of the site from the Green Belt



Examples of Owl Homes Residential Developments

