## Examination of Wyre Forest District Local Plan 2016 – 2036

# Hearing Statement for Matter 9: Hortons' Estate Ltd (ID 260702)

#### December 2020

- 1. Turley is instructed by Hortons' Estate Ltd ('Hortons') to provide a Hearing Statement for Matter 9 which concerns "Business, town centres and retailing; previously-developed sites in the Green Belt".
- 2. Hortons is the owner of Cursley Distribution Park (CDP) (Site ref. WFR/ST/9) and supports the allocation of the site for employment under Policy 10A and as an identified Previously Developed Site (PDL) in the Green Belt under Policy 35.

### 9.1 (i) Are the employment allocations justified and are they likely to provide for the needs of the local economy over the Plan period?

- 3. Policy 10A states that the sites allocated for employment use are listed in Table 10.0.1. This includes CDP (WFR/ST/9).
- 4. CDP is justified as an employment allocation as it comprises a substantial PDL site which provides c.22,500 sqm of industrial floorspace as well as opportunities for infilling, redevelopment and open storage. Some of the buildings are reaching the end of their economic life and Hortons is considering options to redevelop and modernise the site to ensure it offers attractive facilities for the market.
- 5. With opportunities for redevelopment, modernisation and infilling it is important that the site is allocated so that the principle of further employment development is supported.
- 6. Notwithstanding the above, it is unclear why Table 10.0.1 states that the site size for CDP is only 0.7ha when it actually amounts to c.10ha.
- 7. The Housing and Employment Land Availability Assessment (HELAA) (2019) states that the site is 9.98ha in size (page 30 and Site Proforma within the "Eastern Village Sites" Appendix), and the Policies (Appendix B Map A) and Overview Maps (Appendix B Map B) identify the whole site as an employment allocation. Policy 35 also records the site area as 9.98ha.
- 8. There appears to be no explanation for the 0.7ha site area and it is therefore requested that the site size be amended to 10ha.

### 9.4: Does Policy 35 ... give clear, adequate and justified guidance on proposals for development ... Is it consistent with Policy 23A ... and with national planning policy?

- 9. For the same reasons set out in response to Question 9.1 above, Hortons supports the identification of CDP as a PDL site in the Green Belt, providing in principle policy support for B1, B2 and B8 development.
- 10. Policy 25 helpfully confirms that redevelopment of PDL sites in the Green Belt will not amount to inappropriate development (point v). However, para. 145 criterion g) of the Framework states that "**limited infilling** or the partial or complete redevelopment of previously developed land..." is an exception to inappropriate development in the Green Belt (emphasis added).
- 11. For the avoidance of doubt when determining site-specific planning applications for infilling at PDL sites in the Green Belt, Hortons requests that Policy 25 also explicitly refers to "limited infilling" (as well as "redevelopment"). This would render the policy sound as it would accord with national planning policy.

#### Contact

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