

CHURCHILL AND BLAKEDOWN PARISH COUNCIL

Website: www.churchillandblakedown-pc.gov.uk

Clerk: Angela Preece,

10 December 2020

Churchill and Blakedown Parish Council Hearing Statement

Examination of the Wyre Forest District Local Plan 2016-2036

1. This Hearing Statement is prepared and submitted in compliance with document ED17 Inspector's Guidance Note Wyre Forest LP Examination Final 14.10.20 and provides the Hearing Statement of Churchill and Blakedown Parish Council (the "Parish Council").
2. This Hearing Statement is given pursuant to Matter 6(v) of the Matters and Questions document.
3. The Parish Council has submitted two Consultation Response Forms commenting on the following parts of the Local Plan:
 - 3.1 Station Yard, Blakedown. Policy 36.10 and paragraph 36.10; and
 - 3.2 Station Drive, Blakedown. Policy 36.11 and paragraphs 36.19 – 36.21.
4. We have set out in the Schedule below our further comments supplementing our Consultation Response Form referred to at paragraph 3.2 above (relating to Station Drive, Blakedown).
5. Otherwise, and in accordance with the requirements of the Inspector's Guidance Note, we have not repeated our original representations in this Hearing Statement but maintain our objections contained in our Consultation Response Forms.
6. The Parish Council would like to confirm its wish to participate in the hearing sessions concerning Matter 6(v). The Parish Council would propose that the following speakers will make representations at the hearing sessions on its behalf and we should be grateful if you would confirm their attendance:
 - 6.1 Mr Paul Mellor, Parish Councillor for Churchill and Blakedown;
 - 6.2 Mr Simon Rees, Addison Rees Planning Consultancy;
 - 6.3 Mr John Lloyd, Transport, Planning and Engineering Consultant; and
 - 6.4 Mr Alex Goodman, Counsel at Landmark Chambers.

Schedule

1. Error in Churchill and Blakedown HNS Analysis Report

We bring to your attention a discrepancy in the documentation submitted to you by Wyre Forest District Council, which you might like to consider in advance of the hearing sessions.

You will know from your reading of the consultation responses that there are strong objections to the proposed removal of Green Belt status for the land off Station Drive (WFR/CB/3), in order to allocate 50 dwellings and car parking for 170 vehicles at the edge of the village.

The Wyre Forest District Council Housing Topic Paper June 2020 states:

“7.3 The largest village allocation is at Blakedown where 50 dwellings are proposed alongside a new Car Park at the Railway Station. The Housing Needs Survey from 2015 showed a 5-year requirement for **44 market and 7 affordable** dwellings. Data analysis in June 2020 shows limited housing delivery of 9 dwellings (net) and 4 additional dwelling approvals”.

The 2015 Housing Needs Survey was conducted by Wyre Forest District Council and the analysis of the results the responsibility of Midlands Rural Housing. Their initial report, dated April 2015, was forwarded to Churchill and Blakedown Parish Council (copy attached), and did indeed recommend 44 Market and 7 Affordable dwellings.

However, there were obvious glaring errors in the figures quoted, which showed a complete lack of analysis - these errors were brought to the attention of the Planning Officers at Wyre Forest District Council, who asked for further work from Midlands Rural Housing. This resulted in a revised report marked 'FINAL', also dated April (copy attached) which was forwarded to the Parish Council in May/June, which recommended **18 market and 7 affordable** dwellings. This second final Report was to the best of our knowledge accepted by Wyre Forest District Council.

The Neighbourhood Plan does not include any Development sites and the Plan was accepted on the basis of Rural Development sites and infill within the Village envelope.

The Wyre Forest District Council Green Belt Topic Paper June 2020 states:

“8.11.....The residential allocation will help to address an identified local housing need in a location with access to a sustainable mode of transport”.

We would be very concerned if the justification for removing this land from the Green Belt was an exceptional and urgent need for additional housing on the basis of the erroneous figures contained in the original 2015 Housing Needs Survey.

Enclosures:

Churchill and Blakedown HNS Analysis Report 2015 April

Churchill and Blakedown HNS Analysis Report 2015 Revised

2. Land off Station Drive no longer required for station car parking

We have been made aware that Worcestershire County Council has informed Wyre Forest District Council that Station Drive is no longer required for car parking.

Paragraph 36.21 of the Local plan states:

“Additional car parking is needed at Blakedown railway station to meet the demand for car parking spaces for rail users on the commuter line to the Black Country and Birmingham as evidenced in the SLC Rail document”.

This is clearly no longer the case.

Paragraph 36.21 also states that the development of 50 dwellings at Station Drive “would help to cover the costs of the car parking”. This rationale for the inclusion of the development of the 50 dwellings in the Local Plan has fallen away given that the land off Station Drive will not be developed for car parking and the funding is therefore not required.

Further, we understand that it is not necessary to include these 50 dwellings within the Local Plan allocation in order to fulfil a wider housing requirement across the Wyre Forest District.

To summarise: (i) the land is not required for parking; (ii) the houses are not required to fund the car park; (iii) the houses are not required to fulfil any wider housing quota. Accordingly it is our submission that this constitutes further evidence that there are no “exceptional circumstances” which justify the release of the land off Station Drive from the green belt.