

CHADDESLEY CORBETT PARISH COUNCIL

RE: WYRE FOREST DISTRICT COUNCIL (WFDC) LOCAL PLAN (2016 - 2036)

SUBMISSION TO THE LOCAL PLAN EXAMINATION – MATTER 6(V); RURAL AREAS

INTRODUCTION

This submission expands on and updates the Parish Council's response of December 2018 to the consultation on the emerging new Local Plan. The Parish Council objects most strongly to the policies in WFDC's Local Plan (2016-2036) that seek to allocate sites for development in villages washed over by the Green Belt without establishing that there are any exceptional circumstances that would justify it. Specifically:

- Policy 6B (Table 6.0.3)
- Policy 36; at policy 36.7, the references to site WFR/CC/8, Fold Farm, Chaddesley Corbett.

The Parish Council recommends that Policy 36.7 and the site WFR/CC/8 should be withdrawn from the draft Local Plan, so that it does not prioritise market housing over affordable housing for the Parish, and does not prejudice or pre-empt the Parish Council's Review of their Neighbourhood Plan.

BACKGROUND

The Wyre Forest Parish of Chaddesley Corbett is washed over by the Green Belt, and includes two Conservation Areas, one of which covers the main Village. The Chaddesley Corbett Neighbourhood Plan (NP) made in September 2014 identified, in Policy CC1, that any new developments should be brownfield or Rural Exception Sites, and in Policy CC2, that if any development was to take place, it should comprise either affordable housing, smaller properties for young people/families or suitable for older people downsizing.

The Neighbourhood Plan's Site Allocation Policy CCSA1 identified the former school site as being suitable for development. This site, in the centre of the Village, was subsequently developed in 2016, delivering 11 smaller houses and 4 flats, all for sale. Despite the developer initially offering the properties only for sale to local people, only one local person purchased and moved into a property, the rest being sold to people outside the parish, or for investment (buy to let).

Due to the economics of developing the former school site, it delivered no affordable housing, this obligation being offset by a cash contribution to Wyre Forest District Council. The Housing Needs survey conducted as part of the current (2020) review of the NP establishes that there remains a need to deliver a small quantity of affordable housing.

Action 1 of an Appendix to the current Neighbourhood Plan stated: - "Sites for Affordable Housing - The Parish Council will work with the District Council to identify suitable exception sites for affordable housing". The Parish Council has met with planners from Wyre Forest District Council several times to discuss possible sites for affordable housing. On the last two occasions specific sites have been discussed, and the Parish Council has asserted that any site should only be allocated for development as part of the review of the Neighbourhood Plan, which is currently being prepared, and as a Rural Exception Site. In this way, we can ensure that any site would primarily deliver affordable housing, in perpetuity, for local people or those with a local connection.

Contrary to the Parish Council's wishes and Neighbourhood Plan policies (and the NPPF and the District's own Green Belt Review), the Draft Local Plan Policy 36.7 has allocated a small (0.31 Ha) site in Fold Lane, Chaddesley Corbett for a possible 6 No. properties. This site is in the Conservation Area and the whole of the parish is washed over by the Green Belt. The site reference is WFR/CC/8 – Fold Farm Chaddesley Corbett.

The policy is justified by saying "It would satisfy an identified housing need in the village and help to meet an aspiration of the Neighbourhood Plan." We are at a loss to understand this statement, particularly as any deficit is for affordable housing, and there had been no communication or consultation with the Parish Council ahead of WFDC's inclusion of this policy in the new Local Plan.

Wyre Forest's current Policy CP04 includes these words on Rural Affordable Housing:
"A proactive approach to the provision of affordable housing within the District's rural areas will be encouraged through working in conjunction with Parish Councils to identify appropriate sites for the sole provision of affordable housing through the site allocations process, within or immediately adjacent to the District's villages, rural settlements and other rural hamlets where a local need exists."

The District Council has singularly failed to comply with this policy, as there has been no joint working leading to the proposed allocation of this site, and the allocation will not deliver a Rural Exception Site primarily for affordable housing.

Any need for new market housing in the Parish has been substantially addressed, both by the development of the former school site and the steady rate of conversion of redundant agricultural buildings. If the Fold Farm site is allocated in the Local Plan in the way proposed, any development will be for further market housing, in numbers potentially too small to trigger an obligation to include affordable housing.

NPPF basis for the objections

Policy 6B (Table 6.0.3) of the WFDC Local Plan (2016 - 2036) seeks to allocate sites for development in Villages washed over by the Green Belt without establishing that there are any exceptional circumstances that would justify it; this is contrary to the provisions of the National Planning Policy Framework (NPPF). Specifically, within the NPPF:

- Paragraph 11 and its footnotes exclude the green belt from requirements for Local Plan policies to address needs for housing and other uses,
- Paragraph 138 states that "Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport." In contrast, the Chaddesley Corbett site is a greenfield agricultural site within the Conservation Area boundary; there is a nearby bus service, running approximately every 2 hours, only 3 times a day.

CHADDESLEY CORBETT PREFERRED SOLUTION

In order to remain relevant and robust, Chaddesley Corbett's Neighbourhood Plan is being reviewed, and this work is significantly advanced. A 'Call for Sites' exercise has been carried out to identify one or more potential Rural Exception Sites for affordable housing, and the responses have been consulted on and evaluated. The site WFR/CC/8 – Fold Farm, Chaddesley Corbett was one of

the sites under consideration for a possible Rural Exception Site, but has been rejected. This is primarily due to its agricultural use, inadequate access (as highlighted by Worcestershire County Council Highways consultation response), the sensitive location within the Conservation Area and proximity to the Grade I Listed church and numerous other heritage assets.

WFDC's Technical Notes 1 & 2 (ED20A & ED20B) produced in October 2020, in response to requests for further information to assist the Public Examination, also point out the sensitivity of this site. The Technical Notes conclude that the site contributes to the openness of the Green Belt and character of the village, being part of the Conservation Area, and that "Development would compromise the openness of the Green Belt in this location, albeit modestly given the size and location of the site. The potential effects on the village Conservation Area are greater and would have to be subject to a separate historic environment evaluation."

The Parish Council has identified part of a nearby site, off the Bromsgrove Road, as a preferred location for a Rural Exception Site to provide up to 10 affordable homes, and this will be taken forward in the revised NP when it is consulted on in early 2021. This site is identified as WFR/CC/7 in WFDC's HELAA (Housing and Economic Land Availability Assessment).

The Call for Sites exercise has also identified two other locations; although they are more distant from Chaddesley Corbett Village and the main amenities, the Parish Council considers that their development could potentially be supported:

- a small former quarry site potentially suitable for 2 or 3 properties, not identified in the HELAA
- a former garden centre (WFR/CC/9 in the HELAA) where the current use, without planning permission, is the subject of an enforcement order. The brownfield element of this site could be considered acceptable for a small scale development.

These sites will be highlighted in the draft revised NP, which (subject to Covid-19 regulations) is planned to go to referendum in mid 2021. This timing has been arrived at so that the District's new Local Plan should have been adopted before the revised Neighbourhood Plan goes for full consultation and external examination.

CONCLUSION

Chaddesley Corbett Parish Council objects most strongly to the Local Plan's allocation of Green Belt sites for development, and specifically recommends that Policy 36.7 and the site WFR/CC/8 should be withdrawn from the draft Local Plan, so that it does not prioritise market housing over affordable housing for the Parish, and does not prejudice or pre-empt the Parish Council's Review of their Neighbourhood Plan.

Requested modifications to the Local Plan

- Policy 6B (table 6.0.3); delete references to "allocated sites" for villages washed over by the green belt.
- Policy 36 - delete paragraph 36.11, policy 36.7 and any references to site WFR/CC/8, Fold Farm, Chaddesley Corbett
- Appendix B (Chapter 30 site plans) - delete the map for the Fold Farm site (possibly page 77) and amend the overview map accordingly.