

**Wyre Forest District
Local Plan 2016-2036**

Green Belt Topic Paper

October 2020

Wyre Forest District Council

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1. Introduction

Purpose of the Green Belt Topic Paper

- 1.1 The purpose of this topic paper is to set out the exceptional circumstances which justify the release of land within the existing extent of the Green Belt to meet development needs for the Wyre Forest District Local Plan (2016 – 2036).

Location of Green Belt in Wyre Forest District

- 1.2 Figure 1 shows the location of Green Belt within Wyre Forest District and its relationship with the south west extent of the West Midlands Green Belt.

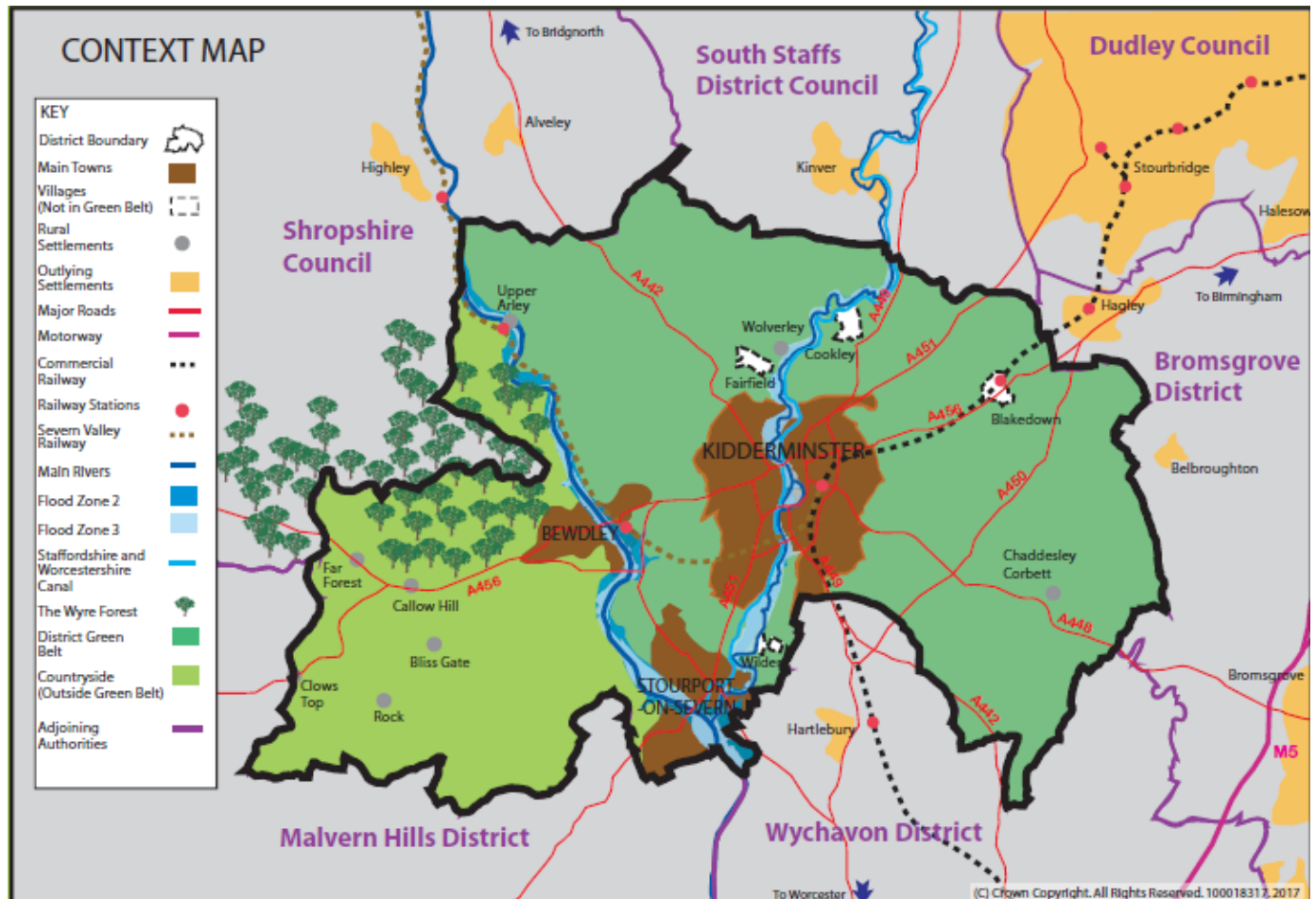
Figure 1: The Green Belt in Wyre Forest District and its sub-regional context



Source: *WFDC Green Belt Review – Strategic Analysis (Sept 2016)*, Amec Foster Wheeler

- 1.3 Within Wyre Forest District, the extent of the Green Belt includes all the land as far west as the River Severn, but excludes the towns of Kidderminster, Stourport-on-Severn and Bewdley and the smaller settlements of Blakedown, Cookley and Fairfield. This is illustrated on the Local Plan Context Map shown in Figure 2.

Figure 2: Local Plan Context Map



Source: Wyre Forest District Local Plan (2016 – 2036) – Submission version, Jan 2020

Amount of land designated as Green Belt

- 1.4 The Green Belt in Wyre Forest District covers 11,216 hectares of land. This equates to 57.4% (over half) of the district being covered by Green Belt. The Local Plan proposes a reduction in the Green Belt which amounts to 2.1% of the current designation. In total, including those sites already completed, under construction and committed, the Plan allocates 49% of housing on brownfield sites. This brownfield percentage includes the 600 dwellings at Lea Castle ex-hospital site (this takes into account viability and flood risk issues). The remainder comprises greenfield land

that is not in the Green Belt (7%) and Green Belt greenfield land (44%). There is limited greenfield capacity on suitable and sustainable sites to the west of the River Severn (i.e. in non-Green Belt locations).

2. History of the Green Belt in Wyre Forest District

Designation of the West Midlands Green Belt

- 2.1 Nationally there are 14 different Green Belts that cover a total area of over 1.6 million hectares of land. The Green Belt in Wyre Forest District is part of the West Midlands Green Belt.
- 2.2 The West Midlands Green Belt was created following the introduction of the Town and Country Planning Act of 1947 which allowed local authorities to include Green Belt proposals in their development plans. The aim of Green Belt designation was to prevent urban sprawl and keep land around towns and cities permanently open.
- 2.3 Land had already been bought by local authorities on the edge of major urban areas to prevent further outward sprawl, when, in the early 1960s there were proposals for a Green Belt around the Birmingham conurbation. Green Belt proposals were put forward as amendments to development plans but remained formally unapproved until 1975, when the Secretary of State approved the West Midlands Green Belt, although a quarter remained 'interim' and was only introduced in later reviews of structure and local plans.
- 2.4 The West Midlands Green Belt covers approximately 900 square miles and extends between 6 and 15 miles from the built edge of the conurbation, surrounding towns like Kidderminster, Bromsgrove, Redditch, Cannock and reaches out to Rugby, Lichfield, Tamworth, Stratford, Warwick, Worcester, Bridgnorth and Telford. While some of these larger settlements are excluded from the Green Belt, villages are often 'washed over' by it.

General Extent of the Green Belt within Wyre Forest District

- 2.5 Within Wyre Forest District, the extent of the Green Belt includes all the land as far west as the River Severn, but excludes the towns of Kidderminster, Stourport-on-Severn and Bewdley and the smaller settlements of Blakedown, Cookley and Fairfield. The precise boundaries of the Green Belt around Kidderminster, Stourport-on-Severn and Bewdley were determined in detail in 1989, upon the adoption of the Wyre Forest Urban Areas Local Plan.

- 2.6 In determining the Green Belt boundaries within the Wyre Forest Urban Areas Local Plan (1989), due regard was had to the longer-term requirements of development. Land at Hurcott, Wilden and Worcester Road, Stourport-on-Severn was taken out of the Green Belt accordingly.
- 2.7 The Wyre Forest District Local Plan adopted in May 1996 did not make changes to the established Green Belt boundary within the District, except in the rural areas where Green Belt boundaries were defined for the first time around the larger settlements of Blakedown, Cookley and Fairfield. These settlements are now excluded from the Green Belt.
- 2.8 The Council's currently adopted Core Strategy (adopted 2010) did not require any review of the Green Belt boundaries within the District as part of its review. Based on the availability of sites for housing and employment purposes (primarily on brownfield sites) it was not necessary to develop the existing Areas of Development Restraint or identify new greenfield sites in Green Belt areas. However, the adopted Site Allocations and Policies Local Plan (2006 – 2026) (adopted 2013) did allocate three large previously developed sites in the Green Belt for major development.

Areas of Development Restraint

- 2.9 The provision for longer-term development was made in the 1996 adopted Local Plan through the adoption of Areas of Development Restraint (ADRs). ADRs are areas of land which are taken out of the Green Belt to meet longer-term housing needs. The ADRs are treated as Green Belt land until they are allocated for development through the plan-making process. The currently adopted Site Allocations and Policies Local Plan (2006 – 2036) (adopted July 2013), includes Policy SAL.UP2: Areas of Development Restraint. The six ADRs in the adopted plan are as follows:
- Land between A451 and Hurcott Village, Kidderminster
 - Land off Hayes Road, Fairfield, Kidderminster
 - Land off Lowe Lane, Fairfield, Kidderminster
 - Land off Kimberlee Avenue, Cookley
 - Land off Wilden Top Road, Wilden, Stourport-on-Severn
 - Four Acres Caravan Park, Stourport-on-Severn.
- 2.10 Policy SAL.UP2 states that land within the ADRs will not be released unless or until identified in a future review of the Development Plan. In the interim period, proposals for development will be assessed against the Green Belt policies of the Development Plan.

2.11 With the exception of the Hurcott ADR and the Four Acres Caravan Park ADR, the Local Plan (2016- 2036) proposes to maintain the current ADR sites as ‘Reserved Housing Sites’ (Safeguarded Land), as detailed in Policy 7B – Reserved Housing Sites in the Green Belt. The Hurcott ADR has already received planning approval for a housing development on the northern area of the site; the southern area of the site is protected by a green gap policy as per Policy 30.12 – Land at Stourbridge Road BW/4 south. The green gap policy is to protect the setting of Hurcott Village and the adjacent Sites of Special Scientific Interest. The Four Acres ADR site at Stourport is currently being used as a Caravan Park providing mobile homes. The land (as shown on the Policies Map) is allocated as a caravan park as per Policy 33.13. The other ADR sites are greenfield and will remain as Safeguarded Land (Policy 7B). Policy 7B states that these Reserved Housing sites will be brought forward for development either through the Neighbourhood Plan process or the next Local Plan review. This is to give local communities that are preparing Neighbourhood Plans a greater influence on the type of development that takes place in these areas in the future. This is consistent with the corporate approach of the Council through its ‘Localism’ agenda which is empowering local communities to operate services and take decisions at the community level.

Previously Developed Sites in the Green Belt

2.12 There are a number of sites that are considered to be ‘Previously Developed Sites’ in the Green Belt which lie within the District boundary. The currently adopted Site Allocations and Policies Local Plan (2006 – 2026) (adopted 2013), allocated the largest of these sites and identified what uses would be acceptable within these locations through a site specific policy (Policy SAL.PDS1). The three large Previously Developed Sites that were allocated are as follows:

- Rushock Trading Estate
- Lea Castle Hospital Site
- West Midland Safari and Leisure Park.

2.13 Policy SAL.PDS1 states that when “considering development within the sites identified as being ‘Previously Developed Sites’, proposals will be permitted providing that they do not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development.”

2.14 Policy 35 in the Local Plan (2016 – 2036) proposes to allocate the following sites as previously developed sites in the Green Belt:

- Rushock Trading Estate

- West Midland Safari Park
- Cursley Distribution Park.

2.15 The site allocations for Rushock Trading Estate and the West Midland Safari Park are allocations rolled over from the currently adopted Site Allocations and Policies Local Plan (as mentioned above). The allocation for Cursley Distribution Park is a new allocation and has been proposed as an allocation because it is a former Ministry of Defence storage depot which is currently being used for B2 and B8 uses with ancillary office accommodation. As a previously developed site in the Green Belt, the site would benefit from the flexibility that Policy 35 provides. The Lea Castle Hospital site has been allocated as part of the wider Lea Castle site in Policy 31 – ‘Lea Castle Village’ in the emerging Local Plan.

3. National Policy Context

National Green Belt Policy

3.1 The Local Plan must be positively prepared, justified, effective and consistent with national policy and legislation. The National Planning Policy Framework (NPPF, 2019) sets out the overarching planning policy framework, supported by the National Planning Practice Guidance (NPPG).

3.2 The National Planning Policy Framework (NPPF) was updated in July 2018 and revised further in February 2019. The NPPF (2019) states the following in relation to Green Belts:

“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Green Belt serves five purposes:

- a) To check the unrestricted sprawl of large built-up areas;*
- b) To prevent neighbouring towns from merging into one another;*
- c) To assist in safeguarding the countryside from encroachment;*
- d) To preserve the setting and special character of historic towns; and*
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.” (NPPF, 2019 – para 133 & 134).*

3.3 Green Belt is therefore a policy designation intended to keep land free from development. There is a common public misconception that Green Belt land is ‘sacrosanct’ and that once designated it should never be

developed. However, this has never been the case in legislative or policy terms.

3.4 National policy is very clear that when a planning application is submitted on Green Belt land, the applicant must demonstrate that ‘very special circumstances’ exist in order to justify harm to the Green Belt. However, a different test applies when determining whether to adjust Green Belt boundaries through a Local Plan; the process of plan-making requires a more strategic and longer-term assessment and then judgement to be made. The NPPF states that: “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.” (NPPF, para 136).

3.5 The NPPF, in paragraph 137, goes on to say that:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) Makes as much use as possible of suitable brownfield sites and underutilised land;*
- b) Optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
- c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.”*

3.6 The NPPF, in paragraph 138, states that:

“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. 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. They should also set out ways in which 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.”

National Planning Practice Guidance

3.7 The National Planning Practice Guidance (NPPG) does not include a definition of what is meant by ‘exceptional circumstances’. However, the section on housing and economic land availability assessment in the NPPG states: “Plan-making bodies should consider constraints when assessing the suitability, availability and achievability of sites and broad locations. For example, assessments should reflect the policies in footnote 6 of the NPPF, which sets out the areas where the Framework would provide strong reasons for restricting the overall scale, type or distribution of development in the plan area (such as the Green Belt and other protected areas).” (NPPG, Paragraph: 002 Reference ID: 3-002-20190722).

Green Belt and compensatory improvements

3.8 The NPPF (para 141) states: “Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

3.9 The NPPG states: “Where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

- *new or enhanced green infrastructure;*
- *woodland planting;*
- *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- *improvements to biodiversity, habitat connectivity and natural capital;*
- *new or enhanced walking and cycling routes; and*
- *improved access to new, enhanced or existing recreational and playing field provision.”* (NPPG, Paragraph: 002 Reference ID: 64-002-20190722)

3.10 The NPPG also states: “Identifying the scope for compensatory improvements is likely to require early engagement with landowners and

other interest groups, once the areas of land necessary for release have been identified. Consideration will need to be given to:

- *land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought;*
- *the scope of works that would be needed to implement the identified improvements, such as new public rights of way, land remediation, natural capital enhancement or habitat creation and enhancement, and their implications for deliverability;*
- *the appropriate use of conditions, section 106 obligations and the Community Infrastructure Levy, to secure the improvements where possible. Section 106 agreements could be used to secure long-term maintenance of sites.” (NPPG, Paragraph: 003 Reference ID: 64-003-20190722)*

3.11 The NPPG advice on the role of the Green Belt in the planning system was published on 22 July 2019. It is important to note that for the purposes of the Wyre Forest District Local Plan (2016 – 2036), this NPPG advice was published after the Pre-Submission publication version of the Local Plan and its amendments document had been approved by WFDC Members at a Cabinet meeting held on 16 July 2019. At this Cabinet meeting, WFDC Members agreed on the re-opening of the Regulation 19 Pre-Submission consultation. The consultation was subsequently undertaken in September/October 2019.

3.12 Therefore, due to the timing of when this guidance was published, it has not been incorporated into the submission version of the Local Plan (2016 – 2036). This is because the submission version of the Plan is that which what was consulted on at the Regulation 19 publication stage. However, this topic paper sets out in section 9 how the plan does meet the NPPG advice through the provision of Green Belt compensation improvements, even though the plan was prepared in advance of the NPPG update being published.

4. Background Evidence

4.1 As part of the preparation of the evidence base for the Wyre Forest District Local Plan (2016 – 2036), the Council commissioned a Green Belt review. The Green Belt review was undertaken by the consultants Amec Foster Wheeler Environment & Infrastructure UK Limited.

4.2 The objective of the Green Belt (GB) review was to test the Green Belt in Wyre Forest District against the five purposes set out in national policy (para 134, NPPF) to determine the extent to which it is contributing to

those purposes. The GB review did not identify land for release or development; it was used alongside other studies, as part of the evidence base in the production of the Local Plan.

- 4.3 The GB review comprises of two parts: Part 1 - Strategic Analysis, and Part 2 - Site Analysis. A link to the two parts can be found here:

(GB01) GB review – Part 1: Strategic Analysis (September 2016) - <https://www.wyreforestdc.gov.uk/media/2973292/Wyre-Forest-Green-Belt-Review-Strategic-Analysis-FULL-DOCUMENT-compressed.pdf>

(GB02) GB review – Part 2: Site Analysis (May 2018) - <https://www.wyreforestdc.gov.uk/media/3991681/Green-Belt-Review-Part-II-Analysis-of-Sites-May-2018-update.pdf>

(GB02a) GB review – Part 2: Site Analysis (May 2018) – Appendix C - <https://www.wyreforestdc.gov.uk/media/3991987/Green-Belt-Review-Part-II-May-2018-Appendix-C.pdf>

The following Technical Notes have been prepared to accompany the Submission Plan at Examination:

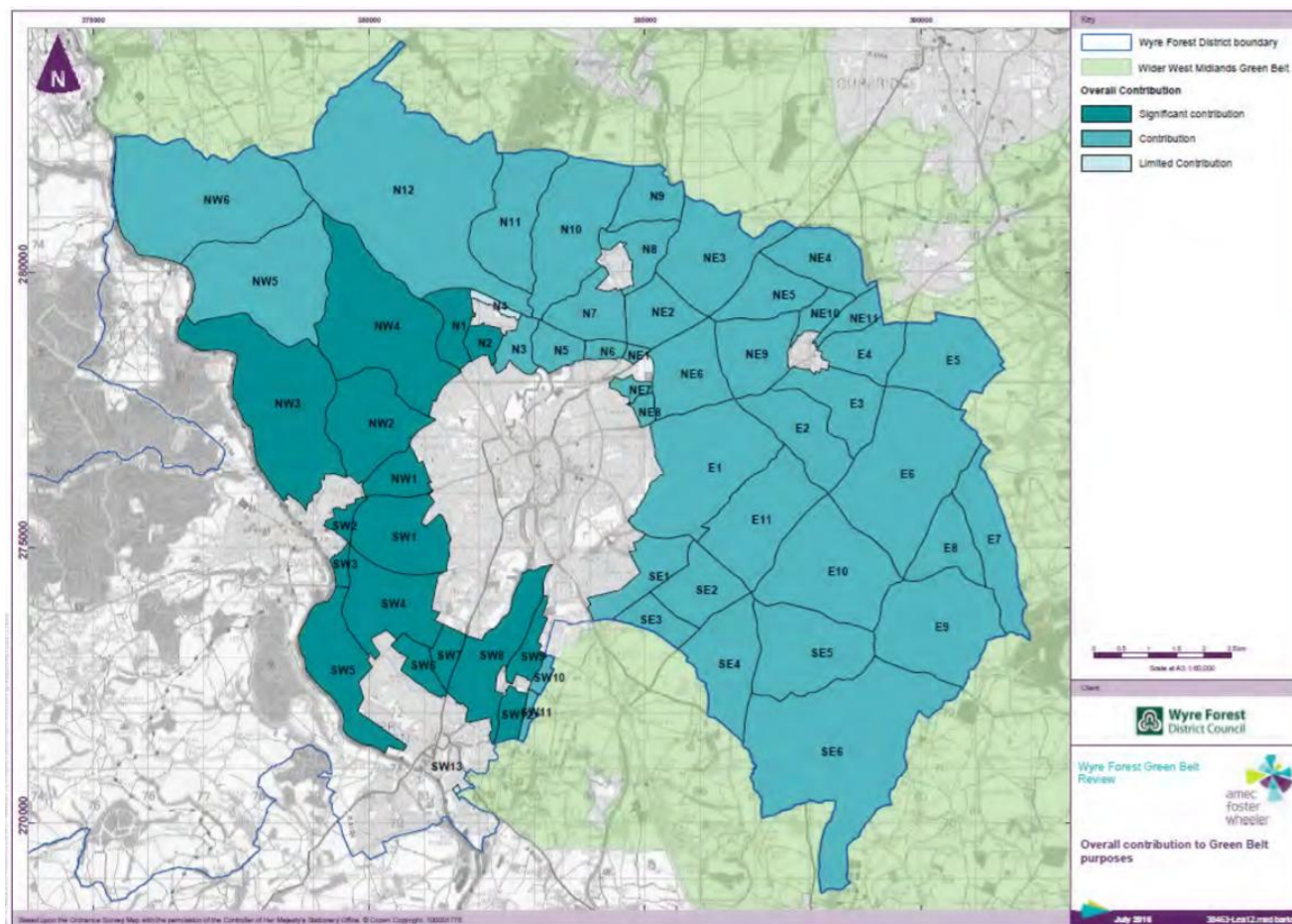
Technical Note 1: Additional Site Assessments

Technical Note 2: Summary of Site Assessments

- 4.4 Part 1 of the GB review is principally a strategic review of the Green Belt purposes, which includes an exploration of the character and role of the villages within the Green Belt, drawing conclusions on the suitability for the continued potential in-setting of villages within the Green Belt, as required by paragraph 140 of the NPPF. Part 1 was undertaken in September 2016 to inform the preparation of the Local Plan.
- 4.5 Part 2 of the GB review is a more refined consideration of the contribution to Green Belt purposes of more specific parcels of land which sit within the strategic parcels. Part 2 was first undertaken in April 2017 to inform the Preferred Options stage; it was updated in May 2018 to inform the Pre-Submission Local Plan.

Strategic Review of the Wyre Forest District Green Belt

- 4.6 The results of the Strategic Review of the Green Belt purposes in Wyre Forest District is illustrated in figure 3. This is a map of the overall contribution to Green Belt purposes which is a composite judgement derived from the detailed analysis of the contribution to the five Green Belt purposes. Further information on this can be found in the evidence base document ‘Green Belt review – Part 1: Strategic Analysis’.

Figure 3: Overall Contribution to Green Belt Purposes

Source: WFDC Green Belt Review - Part 1: Strategic Analysis (Amec Foster Wheeler, Sept 2016)

- 4.7 The results of the Part 1 analysis demonstrate that the Green Belt is making a Contribution or a Significant Contribution to NPPF Green Belt purposes overall. No land was identified as making such a Limited Contribution to Green Belt purposes to warrant removal from the Green Belt. However, two parcels (N4 at Fairfield and SW13 at Lower Heath, Stourport) were identified as making an overall limited contribution. Table 1 sets out the definitions of contribution to Green Belt purposes for the land parcels coloured in the map in Figure 3.

Table 1: Definitions of contribution to Green Belt purposes for land parcels

Green Belt Category	Definition
Significant Contribution	The parcel makes a Significant Contribution to (a) Green Belt purpose(s) and release (either in whole

	or part) is only likely to be considered where particular material planning considerations exist to justify this.
Contribution	The parcel makes a Contribution to (a) Green Belt purpose(s) and release (either in whole or part) would need to be balanced against various material planning considerations.
Limited Contribution	The parcel makes a Limited Contribution to (a) Green Belt Purpose(s) indicating that release (either in whole or part) could be considered in the context of other material planning considerations.

Source: WFDC Green Belt Review - Part 1: Strategic Analysis (Amec Foster Wheeler, Sept 2016)

- 4.8 The GB review Part 1 (paragraph 3.3 - 11) states that “a ‘limited contribution’ does not mean that land should be released from Green Belt or is suitable for development, or conversely that in the case of a ‘significant contribution’ that land should not be released from the Green Belt or is not suitable for development, either in whole or in part.” The identified development requirements and the completed evidence base, which includes the Green Belt Review Parts 1 & 2, have helped to inform the strategy and policies in the Local Plan.

Analysis of Wyre Forest District’s Green Belt Villages

- 4.9 The rural hinterland of Wyre Forest District contains a mix of settlement types, from small clusters of dwellings to substantial villages. The Local Plan (2016-2036) outlines the classification of settlements in ‘Policy 6B: Locating New Development’ and also in the Key Diagram. Four of the district’s existing larger villages have an inset boundary (i.e. excluded) from the Green Belt, and three which remain ‘washed over’, as follows:

- Fairfield (inset)
- Cookley (inset)
- Blakedown (inset)
- Wilden (inset)
- Chaddesley Corbett (washed over)
- Wolverley (washed over)
- Upper Arley (washed over)

- 4.10 The NPPF paragraph 140 requires an analysis of Green Belt villages to determine whether there remains a case for keeping villages washed over by the Green Belt, by virtue of their contribution to Green Belt purposes in respect of helping to maintain openness. The NPPF (para 140) states: “If it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to

the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

- 4.11 The Green Belt Review – Part 1: Strategic Analysis has considered the Green Belt villages in Wyre Forest District. Table 2 sets out the recommendation from the village analysis undertaken in GB review Part 1.

Table 2: Wyre Forest District’s Green Belt Villages

Settlement	Recommendation
Fairfield (inset)	Retain inset – potential for modest extension
Cookley (inset)	Retain inset – potential for modest extension
Blakedown (inset)	Retain inset – potential for modest extension
Wilden (inset)	Retain inset
Chaddesley Corbett (washed over)	Do not inset
Wolverley (washed over)	Do not inset
Upper Arley (washed over)	Do not inset

- 4.12 The GB review Part 1 concluded that the current approach in the adopted Local Plan is reasonable, which is the insetting into the Green Belt of Cookley, Fairfield, Blakedown and Wilden, and the washed over status of Chaddesley Corbett, Wolverley and Upper Arley. The study found that in respect to the three washed over villages, they have a close connection with the Green Belt by virtue of their largely open character, and they therefore make a positive contribution to the wider Green Belt. The study concluded that there was no real case for in-setting the three villages and thereby creating a new development boundary within which in-fill development could occur.
- 4.13 For the four villages which are already inset into the Green Belt, the study concluded that they do continue to merit an inset status, reflecting the scale and density of development. The study went on to say that for the three villages of Cookley, Fairfield and Blakedown, the line of the village envelope and hence insetting boundary could be re-examined to allow for development to meet local needs. The GB review Part 1 states: “The villages within the Green Belt are of a diverse character, with those have been inset into the Green Belt meriting this approach by virtue of their size and density. Modest changes to the settlement envelope could occur to allow for further growth if required. Those villages that are washed over

should remain so because of their open character and strong relationship with the landscape in which they are located. Although again modest development through infill would not necessarily damage their relationship with the Green Belt.” (GB Review – Part 1: Strategic Analysis, p.39).

Potential to extend the Green Belt in Wyre Forest District

- 4.14 The Green Belt review has concluded that there is no strong case for the extension of the Green Belt across the River Severn to contain potential development at Bewdley or Stourport where there is clearly pressure for development but not of an extent that would justify the application of Green Belt principles, combined with an absence of coherent boundaries by which to define new Green Belt.

5. Sustainable Development and Green Belt

- 5.1 A Sustainability Appraisal (SA) (SD04) has been produced alongside the draft Local Plan. The SA considered the scale of growth proposed in the draft Local Plan along with reasonable alternatives, including: 1) Amount of housing; 2) Brownfield v. greenfield land (including Green Belt); 3) Housing sites in each larger town; and 4) Specific development sites.
- 5.2 The SA contains several SA objectives, which includes the following two:
- To maintain the integrity of the Green Belt within the District.
 - To maintain and enhance community and settlement identities.
- 5.3 Over the current adopted plan period most of the development within Wyre Forest District has taken place on previously developed or brownfield land. This type of development has had minimal effect on the Green Belt or community and settlement identities. The Council wants to continue with a brownfield-led strategy in the district's three towns because this protects green areas, reduces the need to travel and generally provides new homes near existing services and infrastructure. However, the capacity from brownfield sites is no longer sufficient to provide the number of homes that are required over the plan period. The SA states that "During the proposed Local Plan period there is not enough previously developed land for all the housing and employment land need. Therefore, some greenfield sites, including some that are currently in the Green Belt, will need to be developed." (SA para 3.5). Local Plan objective 6 aims to protect and support the role of the Green Belt through a strategic review and to identify a necessary and justified level of strategic Green Belt release to enable the delivery of the Plan whilst reinforcing the role and integrity of the Green Belt for future Plan periods. Local Plan objective 1 is to encourage the long-term sustainable development of communities in Wyre Forest District.
- 5.4 The SA concluded that the Plan aims to protect and support the role of the Green Belt through undertaking a strategic review. The plan recognises the conflict between retaining the Green Belt as it currently is and providing enough land for development. Although there would be a 2.1% loss of Green Belt land, the SA considered the Plan's approach of allocating Green Belt sites would help to prevent speculative development elsewhere in the district in less sustainable locations.
- 5.5 The Housing and Economic Land Availability Assessment (HELAA) (HOU04) has assessed sites across the district and has considered whether development capacity could be identified from sites within the urban areas to limit the loss of greenfield and Green Belt land. It remains the case however, that a proportion of the development requirement for the district would remain unmet, unless Green Belt land is released for

development to meet the full extent of the development need for the district.

- 5.6 A separate evidence paper entitled 'Site Selection Paper (August 2019) (SSP01)' has also been prepared as part of the evidence base for the Local Plan. The Site Selection Paper draws together all the different streams of evidence in relation to each site and tells the story as to why some sites were allocated in the Local Plan and others were not. Consideration was given to the Green Belt Review Stages 1 and 2, and any cumulative effects / common circumstances which could affect whether a site, or group of sites, should be taken forward for consideration for allocation. Policy implications of allocation were also taken into consideration. Site selection was also informed by discussions with developers, Worcestershire County Council, statutory consultees, Worcestershire Wildlife Trust, Members of the Council's Local Plan Review Panel, and others.
- 5.7 The use of the evidence base, including the SA, HELAA and the Site Selection Paper, enabled the Council to take a spatially balanced approach to identifying the key sites for the delivery of the development needs over the plan period. The plan aims to site as much development as possible on brownfield land to achieve a sustainable pattern of development. Development opportunities in the existing urban areas have been thoroughly investigated and assessed. However, it was not possible to rely solely on brownfield sites in existing urban areas to meet the development needs. Flooding is also a constraint within all three towns within the district which restricts where new development can be located. It was therefore concluded that the development needs would require the use of some land within the current extent of the Green Belt. The Council has sought to prioritise brownfield land first, followed by sustainable development on greenfield land, and sustainable development on Green Belt sites (some of which is previously developed and surplus public sector land). The Plan also includes two strategic sites that will accommodate a significant amount of the district's housing and employment needs whilst also providing social needs on site.

6. Duty to Co-operate

- 6.1 The NPPF in paragraph 137 emphasises the importance of cross-border cooperation between Local Authorities. This includes whether neighbouring authorities are able to accommodate any of the host authority's (in this case Wyre Forest District) identified development needs. For Wyre Forest District Council, this is demonstrated in the Statements of Common Ground that have been undertaken with neighbouring authorities.
- 6.2 The Council held Duty to Co-operate meetings with its neighbouring authorities during the preparation of the Local Plan. During these meetings, the Council specifically asked neighbouring authorities whether they are able to accommodate any of the District's development needs. No neighbouring authority has indicated a willingness to accommodate any of the development needs for Wyre Forest District. This is mainly because they are Green Belt local authorities themselves, or they cannot accommodate their own needs and are looking to export some of their growth to their neighbouring authorities. This is evidenced in the Statements of Common Ground prepared by WFDC, which form part of the Duty to Co-operate Statement (SD10).
- 6.3 The Council also consulted on the methodology for the Green Belt review (see GB review Part 1 (GB01)). Consultation on the methodology was undertaken to ensure that key interested parties (adjoining local authorities and Parish Councils) were given an early opportunity to comment on the approach being adopted.

7. Proposed changes to the Wyre Forest District Green Belt

7.1 The Policies Map for the Wyre Forest District Local Plan (2016 – 2036) illustrates the proposed changes to the Green Belt. These proposed changes are covered in Policy 7A – Strategic Green Belt Review, with further details in the site allocation policies in Part C of the Local Plan.

7.2 The site allocations that require removal from the Green Belt are shown in table 3 below.

Table 3: Site Allocations that require land to be removed from the Green Belt

Site Ref	Site Description	Proposed Use	No. Dwellings / Employment (ha)	Gross Site Area (ha)	Removed from Green Belt
Kidderminster Town					
WFR/WC/18	Sion Hill School site	H	56	2.1	Y
WA/KF/3	Land at Low Habberley	H	120	5.6	Y
LI/10	Land r/o Zortech Avenue	E		1.48	Y
FPH/27	Adj. Easter Park, Worcester Road	E		2.53	Y
LI/12	Former Burlish Golf Course clubhouse	TS		1.35	Y
LI/13	Land off Zortech Avenue	E		1.96	Y
Lea Castle Village					
WFR/WC/15	Lea Castle Hospital	M	600	48.4	Y
WFR/WC/32	Lea Castle East	M	300 / 7ha	19.9	Y
WFR/WC/33	Lea Castle West	M	400	24.5	Y
WFR/WC/34	Lea Castle North	H	100	11.5	Y
Kidderminster Eastern Extension					
OC/5	Land at Husum Way	H	30	2.1	Y
OC/6	Land east of Offmore	H	300	28.36	Y
OC/12	Comberton	H	10	0.8	Y

	Lodge Nursery				
OC/13N	Stone Hill North	M	1100	57.1	Y
Stourport-on-Severn					
LI/11	Land west of former school site Coniston Crescent	H	200	9.52	Y
MI/38	School site Coniston Crescent	H	115	3.64	Y
MI/36	Firs Yard Wilden Lane	GT	4 pitches	0.41	Y
MI/18	Land north of Wilden Industrial Estate	E		0.22	Y
Bewdley					
WA/BE/1	Stourport Road Triangle	H	100	3.67	Y
WA/BE/3	Catchem's End	H	75	5.61	Y
WA/BE/5	Land south of Habberley Road	H	35	1.71	Y
Rural Wyre Forest					
WFR/CB/3	Land off Station Drive, Blakedown	CP/H	50	2.74	Y
WFR/WC/12	Lawnswood, Cookley	Reserved Housing Site		0.314	Y

Source: Wyre Forest District Local Plan (2016 – 2036) (Submission version, January 2020)

7.3 There are some additional sites that are being allocated for development, but they remain within settlements that are 'washed over' by Green Belt. These development sites are therefore not being removed from the Green Belt. These site allocations are shown in table 4 below.

7.4 The site allocations in table 4 comprise small infill developments (less than 1ha) that will have limited impact on the Green Belt. They are considered to be suitable and appropriate locations for small-scale development and will help to address local housing need in these areas.

Table 4: Site Allocations in settlements ‘washed over’ by Green Belt

Site Ref	Site Description	Proposed Use	No. Dwellings / Employment (ha)	Gross Site Area (ha)	Removed from Green Belt
Stourport-on-Severn					
MI/24	Adj. Rock Tavern, Wilden Lane	H	2	0.06	N
Rural Wyre Forest					
WA/UA/1	Bellman’s Cross, Shatterford	H	16	0.8	N
WA/UA/4	Allotments, Upper Arley	H	10	0.46	N
WA/UA/6	Red Lion Car Park, Bridgnorth Road	H	2	0.1	N
WFR/CC/8	Fold Farm, Chaddesley Corbett	H	6	0.31	N
WFR/WC/36	Rock Tavern Car Park, Caunsall	H	3	0.11	N
WFR/WC/37	Land at Caunsall Road, Caunsall	H	4	0.84	N

7.5 Policy 18B – ‘Residential Infill Development’ in the Local Plan encourages infill development, some of which may technically be in the Green Belt where settlements are ‘washed over’ by the Green Belt. However, by allowing some infill development this helps to prevent speculative Green Belt development occurring in undesirable locations. It also helps to contribute towards new housing provision in the district and will potentially help to address local housing need within rural settlements where a need has been identified.

7.6 In the Local Plan Policy 25 – ‘Safeguarding the Green Belt’ prevents development in the Green Belt except under strict conditions. With regards to future planning applications on land within the Green Belt, these will remain subject to ‘very special circumstances’ being demonstrated, and the Council will continue to be guided by national planning policy on such matters.

- 7.7 Policy 35 – ‘Previously Developed Sites in the Green Belt’ allocates Cursley Distribution Park, and supports development in the existing Rushock Trading Estate, and West Midland Safari Park.

Reserved Housing Sites in the Green Belt

- 7.8 The Local Plan (2016 – 2036) includes Policy 7B – Reserved Housing Sites in the Green Belt. Policy 7B allocates the following sites as Reserved Housing Sites (RHS):
- Land off Hayes Road, Fairfield (WFR/WC/23);
 - Land off Lowe Lane, Fairfield (WFR/WC/22);
 - Land off Kimberlee Avenue, Cookley (WFR/WC/10);
 - Land of Wilden Top Road, Wilden (MI/21);
 - Lawnswood, Cookley (WFR/WC/12).
- 7.9 Policy 7B states that “any development of these sites will be subject to consideration through a full or partial review of this Local Plan or through a Neighbourhood Plan process. In the interim period, proposals for development will be assessed against the Green Belt policies of the Development Plan.” RHS sites are areas of land which have been taken out of the Green Belt to meet longer-term housing needs. With the exception of site ‘Lawnswood, Cookley (WFR/WC/12)’, the RHS sites are former ADR sites. The Local Plan (2016 – 2036) continues to safeguard these sites for future housing development and will be brought forward through a future full or partial Local Plan review or through the Neighbourhood Plan process. This approach to the former ADR sites has been taken to give local communities who are preparing Neighbourhood Plans, a greater say on future development in their areas, this is consistent with the Council’s overall approach to localism and empowering local communities in making their own decisions. The Council’s Corporate Plan (2019 – 2023) includes the strategic action: “Work with town and parish councils so that they have local control over assets and services”.
- 7.10 Policy 7B also provides flexibility should the Council not be able to demonstrate a five-year housing land supply or where the Housing Delivery Test has been failed. The sites allocated as RHS sites will provide the first option to consider for development if sites are not available to meet the desired requirement in other, sequentially preferable locations. Inappropriate development on non-allocated sites within the Green Belt will not be supported.

8. Exceptional Circumstances

Wyre Forest District Exceptional Circumstances

- 8.1 The NPPF stipulates that altering the boundaries of the existing Green Belt must be done through new or updated local plans and “exceptional circumstances” are required. Exceptional circumstances should be “fully evidenced and justified, through the preparation or updating of plans.” The NPPF states that, before Green Belt boundaries are redrawn, an authority must demonstrate that it has “examined all other reasonable options for meeting its identified need for development”, including making use of brownfield land, increasing the density of existing settlements and exploring whether neighbouring authorities can help meet its need. However, the NPPF does not define which circumstances can be considered exceptional.
- 8.2 The December 2019 judgement dismissing the High Court challenge to Guildford Borough Council’s Local Plan, which de-allocated three major sites from the Surrey towns’ Green Belt, provides some clarification on exceptional circumstances. The judge, Sir Duncan Ouseley, concluded that “exceptional circumstances” is a less stringent test than applied to planning applications for development that would normally be seen as inappropriate in the Green Belt, which requires “very special circumstances.” Furthermore, the judge ruled that no more than one individual circumstance was needed. In addition, the judge stated *“exceptional circumstances can be found in the accumulation or combination of circumstances, of varying natures, which entitle the decision-maker, in the rational exercise of a planning judgement, to say that the circumstances are sufficiently exceptional to warrant altering the Green Belt boundary”*.
- 8.3 The case of *Calverton Parish Council v Greater Nottingham Councils* ([2015]1 sets out that the planning judgements involved in the consideration of exceptional circumstances in the context of both national policy and the positive obligation located in section 39(2) of the Planning and Compulsory Purchase Act 2004 should, at the very least, identify and grapple with the following matters:
- i. the acuteness/intensity of the objectively assessed need (matters of degree may be important);
 - ii. the inherent constraints on supply/availability of land prima facie suitable for sustainable development;
 - iii. (on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;

¹ *Calverton Parish Council v Greater Nottingham Councils & Ors* (2015) EWHC 1078 (Admin) (21 April 2015)
www.bailii.org/ew/cases/EWHC/Admin/2015/1078.html

- iv. the nature and extent of harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and,
- v. the extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonable practicable extent.

- 8.4 These matters form a helpful reference point for the consideration of Exceptional Circumstances which justify the release of, and development on, Green Belt land within Wyre Forest District.

Housing Need

- 8.5 The Wyre Forest District Housing Need Study (2018) highlights Wyre Forest District's housing need to be at least 5,520 homes to 2036 (based on 276 dwellings per annum). The Plan aims to provide at least 5,520 homes and 487 care home/institutional spaces until 2036, and it sets out where these should go. The Council has produced a Housing Topic Paper (June 2020) which explains the justification for the district's housing requirement that has been calculated as 276 dwellings per annum. The 276 dpa housing requirement has been calculated giving weight to the 2016 household projections, as opposed to adopting the 2014 household projections and 'Standard Method' which would give a lower figure of 248 dpa. However, even if using the lower figure this would still necessitate Green Belt land release. The Council is committed to meeting its housing requirement in full, plus ensuring an appropriate degree of 'headroom' (c15%) between the requirement figure and the capacity of sites allocated to meet the requirement to ensure the Plan remains robust and flexible (the Housing Topic Paper (June 2020) provides the justification for this). Having undertaken a comprehensive review of the Green Belt together with a full analysis of other relevant evidence, it is clear that the Council cannot physically accommodate all this development need within its existing urban areas.
- 8.6 The NPPF is clear that housing need (market and affordable) must be met. Through the findings of the Sustainability Appraisal and in taking these findings on board, the Council has considered realistic alternative options through its Local Plan review and the Duty to Co-operate (see Section 6). Existing urban areas and non-Green Belt land has been considered as part of the SA Report (SD04, SD04a-b), the HELAA (HOU04, HOU04Aa-d) and the Site Selection Paper (SSP01, SSP01a-b) but existing Green Belt land is required to meet the District's housing needs, including identified needs for affordable housing, in sustainable locations.

Employment Need

- 8.7 The District's tight development boundary close to its main towns means that potential employment land supply is limited. The district must provide employment land to stimulate economic growth, however, to promote a balance of need and supply in appropriate locations Green Belt land must be utilised. The Plan aims to provide at least 29 hectares of employment land until 2036.
- 8.8 Without the release of land for development that is currently in the Green Belt, the district would not be able to demonstrate a continuous rolling five-year supply of housing land or a continuous supply of employment land throughout the plan period. The need for housing in general and affordable housing in particular, are matters to be given very substantial weight. Paragraph 145(f) of the NPPF confirms that affordable housing is an issue of sufficient weight for it potentially to be an exception to normal Green Belt policy.

Sustainable Development

- 8.9 The release of Green Belt land is the most sustainable option for the district. The spatial development strategy for the district is to focus development on the most sustainable settlements, and in order to achieve this, the Council needs to release Green Belt land.
- 8.10 The Draft Local Plan was accompanied by a Sustainability Appraisal which considered the scale of growth proposed in the Draft Local Plan (5,520 homes and 29ha of employment land), along with reasonable alternatives.
- 8.11 In respect of the consideration of reasonable alternatives, the Sustainability Appraisal Report (NTS, July 2019, (SD04b)) concludes that: the plan aims to put as much development as possible on brownfield sites, which are mostly in Kidderminster and Stourport. Alternatives for the remaining greenfield development included:
- An urban extension to the north east of Kidderminster
 - An urban extension to the east or south east of Kidderminster
 - Greenfield and Green Belt land around Stourport
 - Greenfield and Green Belt land around Bewdley
 - Development of the villages and settlements in the district's rural north east
 - Development of the villages and settlements in the district's rural north west
- These options generally had neutral or uncertain impacts, with negative impacts on heritage, soil and the Green Belt. In practice, the final plan combines all of

the alternatives.

- 8.12 Whilst a strategy which involves release of Green Belt land represents a relatively sustainable option, not all sites within the Green Belt represent sustainable development locations. Some sites are particularly valuable in terms of their contribution to wildlife, or perhaps to the landscape, whilst others are not well located in terms of flood risk or in terms of accessibility to services. Therefore, sustainability must also be considered at the site level to ensure that where it is necessary to impinge on the Green Belt that the resulting development will still be capable of being considered as sustainable, compared to reasonable alternatives.
- 8.13 The Sustainability Appraisal indicates that those sites identified for housing purposes at that time were generally the most sustainable development options, although mitigation measures would be needed in some cases to overcome harmful impacts. Sites where flood risk cannot be mitigated adequately, or where there would be unmitigated harm to designated biodiversity assets were not considered suitable by the Sustainability Appraisal.
- 8.14 The Sustainability Appraisal Report (NTS, July 2019, (SD04b)) summarises the outcomes of this assessment. The Report identifies a neutral effect in respect of the use of Green Belt land, noting that: “The plan tries to balance the protection of the Green Belt and the provision of enough land for development. It provides for 23 Green Belt sites totalling 246ha, or 2.1% of the Green Belt. Of this, the Lea Castle sites account for 120ha, and the Eastern Extension for 79ha. This approach will help to prevent speculative development in less sustainable locations.”
- 8.15 The Sustainability Appraisal Report identifies, for larger site allocations, the need for the application of various mitigation measures, including:
- For health: Providing green infrastructure corridors and allotments
 - For transport and air: Providing pedestrian and cycling routes
 - For heritage: Keeping historically important buildings and views, designing new development to fit with listed buildings
 - For landscape: Providing new landmarks and green areas
 - For biodiversity: Protecting woodlands, water bodies and mature trees, carrying out bat and otter surveys, limiting access to sensitive sites
 - For the Green Belt: Limiting building heights to those of existing buildings, planting trees on the boundaries of development sites.

The nature and extent of harm to the Green Belt

- 8.16 The Part 1 Green Belt Review (September 2016) concludes that the vast majority of the Green Belt in Wyre Forest District contributes towards openness and at least one of the purposes of including land within the Green Belt, at least partially. There will therefore be inevitable harm arising from development of land within the current extent of the Green Belt. However, the nature and extent of the harm will vary from site to site depending on:
- the size of the site;
 - the location of the site;
 - the topography, landscape and visual prominence of the site; and the extent of Green Belt that will remain in a given location after development has occurred, and the ongoing purpose that Green Belt will serve.
- 8.17 These matters will vary from site to site, and drawing from the Part 2 (May 2018) Site Analysis, the nature and extent of harm to the Green Belt is set out in the settlement-by-settlement proposals for Green Belt release detailed in paragraphs 8.26 – 8.29 below.

The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent

- 8.18 Notwithstanding attention on a site-by-site basis to reducing harm to the Green Belt, there are some overarching measures that can be taken to ensure that harm to Green Belt is minimised through the plan-making process. These include those measures such as investigations of urban capacity including the capacity of town centres, use of previously developed land, consideration of estate renewal and optimising development on public sector land holdings. These measures should be ongoing to ensure that the windfall allowance is achieved, and where possible exceeded.
- 8.19 Consideration can also be given to the densities achieved on any land that the Council does consider releasing from the Green Belt, as higher densities will require the release of less land from the Green Belt to deliver the same number of homes. Densities will however need to be considered on a site by site basis, as there will be some locations where higher densities will be inappropriate.
- 8.20 Consideration can also be given to the creation of new public open spaces at the edge of developments, or between developments, to maintain a sense of containment/ separation and bring land which may be at risk of future encroachment into a practical use that benefits existing and new local residents. This not only mitigates the effects of harm of the Green Belt, but also responds positively to the NPPF which promotes the

positive use of land in the Green Belt for recreation and nature conservation purposes. These matters are considered in Section 9 below.

- 8.21 At a site scale, the design and layout of development and the use of landscaping will play an important role in mitigating harm to the Green Belt. Design and layout can ensure that development integrates into adjacent development (where this exists), and also the wider rural environment particularly where new boundaries are established to ensure that visually prominent parts of the site are either avoided, or else developed in a more sensitive way. Landscaping meanwhile can screen development in both nearby and long-distance views. It is also important that this landscaping is integral to the development, reducing the perception of the effects on reductions in physical and visual openness arising from development.

Proposed Allocations

- 8.22 Most of the site allocations in Kidderminster Town and Stourport are brownfield sites, but many of those in Kidderminster North, Kidderminster East, Bewdley and the rural villages are both greenfield and Green Belt. In total, the plan allocates 196ha of greenfield land for development (202ha if reserved housing sites are included), and 246ha of Green Belt land. Not all of the Green Belt land is greenfield: for instance, the former Lea Castle hospital is a brownfield site in the Green Belt, as are several other smaller sites. The Lea Castle site is also surplus public sector land.
- 8.23 The Council declared a climate emergency in 2019 following changes in Government legislation. In 2019 the Council also updated its Corporate Plan (2019-2023) which includes the strategic action “Work with partners to protect our environment, to address air quality issues and to help to tackle climate change”. Sustainable development in the Green Belt is preferable to development in less sustainable locations. For reasons of lack of access to services and facilities, and access to sustainable modes of transport, locating significantly more development on greenfield sites outside the Green Belt would not be a sustainable approach.
- 8.24 Although the results of the Green Belt study Part 1 analysis demonstrated that the Green Belt is making a Contribution or a Significant Contribution to NPPF Green Belt purposes overall, it is not necessary for land to contribute little to Green Belt purposes for Exceptional Circumstances to exist. Land might perform a contribution or even a significant contribution to Green Belt role and yet there may be Exceptional Circumstances to release it because it is in the most sustainable location or achieves other objectives, such as meeting the otherwise unmet housing need for the District. In Wyre Forest District, there is a need for housing (particularly affordable housing) and employment, there is a lack of alternatives in sequentially preferable locations outside of the Green Belt.

8.25 The following sections present the proposed allocations of Green Belt sites by settlement, summarising their contribution to the Green Belt, the likely effect of development on the Green Belt and the Exceptional Circumstances pertaining to individual sites. Appendix 1 presents a summary of the contribution to the Green Belt, by individual Green Belt purpose.

The site-by-site commentary presented below should be read in combination with other elements of the evidence base, in particular the Worcestershire Green Infrastructure Partnership constraints and opportunities assessment of landscape, biodiversity, flood-risk and historic environment matters (document GI04).

Kidderminster

8.26 The majority of the Local Plan's proposed Green Belt release is centred around Kidderminster. The Settlement Hierarchy Technical Paper (July 2019) (SH01) identifies Kidderminster as the main town within the district. The town has a full range of services and facilities and is well served by sustainable travel modes, including a mainline railway station, compared to the other parts of the district. Therefore, it is the most sustainable settlement and has been identified as the main focus for future development.

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Exceptional Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
WFR/WC/15 Lea Castle Village – main site	CONTRIBUTION The character of the site, being previously developed and strongly bounded physically and visually, means that the overall impact of development on Green Belt purposes would be limited. However, should development encroach beyond current developed footprint then the impact would be significantly greater, reflecting careful siting of past development on a plateau and the benefit of landscape planting containing visual impacts.	The effect on openness of the Green Belt in this location would be neutral, reflecting the site's previously developed nature although this is dependent upon retention of the current development footprint, building density and height.	The site meets Green Belt purposes moderately. The site can make an important contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated, and the boundaries would be permanent and defensible in accordance with NPPF requirements. Assuming appropriate site design and visual mitigation, the openness and permanence of the wider Green Belt will not be compromised. The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.
WFR/WC/32 Lea Castle Village – land to the east	SIGNIFICANT CONTRIBUTION Overall, the site makes a significant contribution to the Green Belt through its role in safeguarding the countryside	Development is judged to have a significant effect on the openness of the Green Belt in this location, being on the flanks of rising land which is exposed to the south and south east. The	Whilst the site meets Green Belt purposes significantly, the site can make an important contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated to

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Exceptional Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
	<p>from encroachment (clearly being visually and functionally part of the open countryside to the north of Kidderminster) and sprawl along the A451. Development would have a significant effect on openness reflecting the partial enclosure of the site and its visually sensitivity creating a fundamentally new character to this gateway to Kidderminster.</p>	<p>land is part of the north eastern gateway to Kidderminster and notwithstanding the presence of the Lea Castle site immediately to the north west, would introduce development into open countryside.</p>	<p>some degree through site design.</p> <p>The openness and permanence of the wider Green Belt is likely to be compromised through the creation of a new built edge along the A451 and to the north, adjacent to and south of Axborough Lane.</p> <p>The harm to the Green Belt in this location would need to be balanced against the sustainability of the site as a development location.</p>
<p>WFR/WC/33 Lea Castle Village – land to the west</p>	<p>CONTRIBUTION</p> <p>The site contributes to the role of the wider Green Belt, being part of open countryside to the north of Kidderminster. The land forms the principal context of the northern gateway to Kidderminster along the A449 Wolverhampton Road and development would alter the relationship between town and country in this location.</p>	<p>The site contributes to the openness of the countryside in this locality reflecting its scale and orientation, despite being enclosed on two sides by built development. There is a visual connection with open land to the west, which together with this land forms a distinct countryside context for the northwest of Kidderminster.</p>	<p>The site meets Green Belt purposes moderately. The site can make an important contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated to some degree.</p> <p>Given the physical and visual enclosure of the land, the openness and permanence of the wider Green Belt are unlikely to be compromised.</p> <p>The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.</p>
<p>WFR/WC/34 Lea Castle Village – land to the north</p>	<p>CONTRIBUTION</p> <p>Whilst the site is physically related to the carefully located and screened Lea Castle Hospital site and development along Lea Castle Drive, it is nevertheless related in character and orientation to the wider open countryside to the north. Development would introduce a new built edge.</p>	<p>Development, whilst bounded on all sides, would intrude upon the wider openness of the Green Belt in this location, by introducing a new urban edge into land which visually related and oriented to the open countryside to the north, rather than existing development immediately to the south.</p>	<p>Whilst the site meets Green Belt purposes moderately, the site can make a contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated to some degree through site design and the boundaries would be permanent and defensible in accordance with NPPF requirements.</p> <p>The visual openness of the wider Green Belt to the north is likely to be compromised through the creation of a new built edge, albeit bounded by Axborough Lane.</p> <p>The harm to the Green Belt would need to be balanced against the sustainability of the site as a development location.</p>
<p>OC/5 Land at Husum Way</p>	<p>CONTRIBUTION</p> <p>Overall, the site contributes to the Green Belt in its contribution to safeguarding the countryside from encroachment (being visually interconnected with the wider open countryside) and although having a limited role in preventing sprawl in itself, in combination with land to the east has a more significant</p>	<p>Development would not have a significant effect on openness, given the strongly bounded character of the site, although it is visually sensitive and development would create a new character to this gateway site.</p>	<p>The site meets Green Belt purposes moderately. The site can make a contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated, and the boundaries would be permanent and defensible in accordance with NPPF requirements.</p> <p>The openness and permanence of the wider Green Belt will not be compromised.</p> <p>The benefits associated with the release of</p>

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Exceptional Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
	role.		the site and its subsequent development are judged to outweigh the disbenefits.
OC/6 Land east of Offmore	SIGNIFICANT CONTRIBUTION The site is part of wider land to the east of Kidderminster which prevents sprawl into open countryside, and whilst the site is bounded on three sides, its eastern boundary is insubstantial. As such, the site makes a significant contribution to preventing sprawl and more broadly the encroachment of the urban area into the open countryside.	Whilst the site is a direct extension of the built edge of Kidderminster, there is no current eastern boundary. The openness of the site both physically and visually would be compromised, particularly given the rising topography to the east. Significant mitigation would be required to define a new eastern edge of the town in this location.	Whilst the site meets Green Belt purposes significantly, the site can make an important contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated to some degree through site design. The openness and permanence of the wider Green Belt are likely to be compromised through the creation of a new built edge. Mitigation through the creation of a development boundary is likely to require significant intervention. The harm to the Green Belt would need to be balanced against the sustainability of the site as a development location.
OC/12 Comberton Lodge Nursery	CONTRIBUTION Whilst of a small scale and enclosed character, the site is nevertheless part of open countryside to the north of the Comberton Road which is sensitive to change through new development. The site is part of the wider parcel E1 which was judged to make an overall Contribution to Green Belt purposes.	Development would compromise the openness of the Green Belt through the introduction of built form into predominantly open countryside to the north of Comberton Road. However, the size of the site along with its strongly bounded and visually enclosed character means that the degree of this compromise would be limited. If proposed for development, consider retaining washed over Green Belt status in order to control development density and potential for encroachment.	The site meets Green Belt purposes moderately. The site can make a contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated, and the boundaries would be permanent and defensible in accordance with NPPF requirements. The openness and permanence of the wider Green Belt are unlikely to be compromised. The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.
OC/13N Land at Stone Hill North	CONTRIBUTION The site overall makes a contribution to Green Belt purposes by virtue of its role as open countryside containing the built edge of Kidderminster. In the absence of clear, significant boundaries, development would represent encroachment and sprawl into open countryside which could only be overcome through masterplanning which considered the development in a wider context which attended to the southeastern edge of the town more generally. Whilst there are few visual receptors in this locality	In the absence of clear, significant boundaries, development would represent encroachment and sprawl into open countryside which could only be overcome through masterplanning which considered the development in a wider context which attended to the southeastern edge of the town more generally. Whilst there are few visual receptors in this locality and the site is generally well screened from the A448, development would create a fundamentally new relationship between	The site meets Green Belt purposes moderately. The site can make an important contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated to some degree. The openness and permanence of the wider Green Belt are likely to be compromised through the need for the creation of a new built edge and relationship with the wider countryside to the east. Mitigation through the creation of a development boundary is likely to require significant intervention. The harm to the Green Belt would need to be balanced against the sustainability of the site as a development location.

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Exceptional Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
	and the site is generally well screened from the A448, development would create a fundamentally new relationship between town and country.	town and country.	
LI/10 Land r/o Zortech Avenue	CONTRIBUTION Whilst the site is of a relatively modest scale, it is nevertheless part of wide land (strategic parcel SW4) which makes a Significant Contribution to Green Belt purposes overall, reflecting its size and strategic location between Kidderminster, Bewdley and Stourport. As such the parcel makes a Contribution to the Green Belt by containing the urban edge of Kidderminster, in combination with other land.	Development would result in the extension of the built edge of Kidderminster into open land to the southwest. As such this would harm physical openness and to a lesser extent visual openness. The site, however, in combination with surrounding land, could lend itself to redevelopment which incorporates landscape and nature conservation enhancement which complements the wider Green Belt. Note: development to be considered in relation to adjacent sites LI/12 and LI/13.	The site meets Green Belt purposes moderately. The site can make an important contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated through site design. The openness and permanence of the wider Green Belt are unlikely to be compromised, reflecting the scale and visual containment of the site. The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.
LI/12 Former Burlish Golf Course Clubhouse	CONTRIBUTION Whilst the site is of a relatively modest scale, it is nevertheless part of wide land (strategic parcel SW4) which makes a Significant Contribution to Green Belt purposes overall, reflecting its size and strategic location between Kidderminster, Bewdley and Stourport. As such the parcel makes a Contribution to the Green Belt by containing the urban edge of Kidderminster.	Development would result in the extension of the built edge of Kidderminster into open land to the southwest. As such this would harm physical openness and to a lesser extent visual openness. The site, however, in combination with surrounding land, could lend itself to redevelopment which incorporates landscape and nature conservation enhancement which complements the wider Green Belt. Note: development to be considered in relation to adjacent sites LI/10 and LI/13.	The site meets Green Belt purposes moderately. The site can make an important contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated through site design. The openness and permanence of the wider Green Belt are unlikely to be compromised, reflecting the scale and visual containment of the site. The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.
LI/13 Land Off Zortech Avenue	CONTRIBUTION Whilst the site is of a relatively modest scale, it is nevertheless part of wide land (strategic parcel SW7) which makes a Significant Contribution to Green Belt purposes overall, reflecting its size and strategic location	Development would result in the extension of the built edge of Kidderminster into open land to the southwest. As such this would harm physical openness and to a lesser extent visual openness. The site, however, in combination with	The site meets Green Belt purposes moderately. The site can make an important contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated through site design. The openness and permanence of the wider Green Belt are likely to be

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Exceptional Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
	between Kidderminster, and Stourport. As such the parcel makes a Contribution to the Green Belt by containing the urban edge of Kidderminster.	surrounding land, could lend itself to redevelopment which incorporates landscape and nature conservation enhancement which complements the wider Green Belt. A significant issue relates to the definition of an outer boundary to the site, being currently undefined to the southwest. Note: development to be considered in relation to adjacent sites LI/10 and LI/12.	compromised through the creation of a new built edge. The harm to the Green Belt would need to be balanced against the sustainability of the site as a development location.
WA/KF/3 Land at Low Habberley	SIGNIFICANT CONTRIBUTION The site forms part of the arc of Green Belt which contains the northerly extent of Kidderminster, limiting extension of the contiguous built-up area of the town into open countryside. As such, and in combination with the wider Green Belt in this locality, the site makes a significant contribution to Green Belt purposes of containing sprawl and preventing encroachment.	Whilst the site is small and nominally adjacent to the urban edge of Kidderminster, it is nevertheless exposed visually and physically, being bounded by an insubstantial hedge to the north west and thereby physically and visually connected to the wider open countryside.	Whilst the site meets Green Belt purposes significantly, the site can make a contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated to some degree through site design. The openness and permanence of the wider Green Belt are likely to be compromised through the absence of a substantial containing boundary and the creation of a new built edge affecting the openness of the remaining Green Belt. Mitigation through the creation of a development boundary is likely to require significant intervention. The harm to the Green Belt would need to be balanced against the sustainability of the site as a development location.
WFR/WC/18 Sion Hill School site	LIMITED CONTRIBUTION Development of the site would not compromise the purposes of the Green Belt strategically or locally, because of its scale and containment physically and visually.	There would be an effect on openness because of the introduction of built form into open land, but visual containment and previous development on the western part of the site reduces this impact.	The site meets Green Belt purposes to a limited degree. The site can make a contribution to meeting the development needs of the District in a sustainable location. The impacts on the Green Belt can be mitigated through site design. The openness and permanence of the wider Green Belt are unlikely to be compromised. The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.
FPH/27 Land adjacent Easter Park, Worcester Road	LIMITED CONTRIBUTION The site makes a very limited contribution to Green Belt purposes strategically and locally, being strongly bounded on all sides and largely visually isolated from the Green Belt to the east and south. The local context, which	Development would have a limited effect on openness, being dominated by urban uses to the north and west. However, a degree of sensitivity in the scale and massing of development would need to be exercised given the site's	The site meets Green Belt purposes to a limited degree. The site can make a contribution to meeting the development needs of the District in a sustainable location. The impacts on the Green Belt can be mitigated through site design. The openness and permanence of the wider Green Belt will not be compromised. The benefits associated with the release of

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Exceptional Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
	has a strongly urbanised character, adds to the sense of disconnection of the site from Green Belt purposes.	place as part of the southern gateway to Kidderminster along the A449.	the site and its subsequent development are judged to outweigh the disbenefits.

Stourport

8.27 Stourport is a large-sized market town and is considered to be the next most sustainable settlement in terms of the provision of services and facilities. The town has a range of shops and services which support the town but do not provide the range and choice available in Kidderminster (it has no main-line railway connection). Stourport does offer a range of employment opportunities. There is also direct public transport (bus) access to the South Kidderminster Enterprise Park which links Stourport to Kidderminster. Stourport is therefore considered to be the second most sustainable location in the district.

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Exceptional Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
LI/11 Land west of former school site Coniston Crescent	SIGNIFICANT CONTRIBUTION The site is part of the remaining open land between Stourport and Kidderminster, the erosion of which would further narrow the already limited gap between the two settlements. Development would have to be considered in the context of proposals on an adjacent site.	The site and its wider context is characterised by a high degree of visual exposure which would be compromised by development, particularly in respect of the unbounded northeastern edge. Here, despite 'rounding-off' of the built edge, development would represent an extension into local countryside.	Whilst the site meets Green Belt purposes significantly, the site can make a contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated to some degree through site design. The openness and permanence of the wider Green Belt are likely to be compromised through the creation of a new built edge. The harm to the Green Belt would need to be balanced against the sustainability of the site as a development location.
MI/38 School Site, Coniston Crescent	SIGNIFICANT CONTRIBUTION The site is part of the remaining open land between Stourport and Kidderminster, the erosion of which would further narrow the already limited gap between the two settlements. Development would have to be considered in the context of proposals on an adjacent site – land off Windermere Way.	Although part of a former school, the land retains an open aspect and visual relationship with the former golf course to the northwest and allotments to the northeast. Development would impinge upon the openness of the land and would, on its own, be an incongruous extension of the built edge of Stourport, off Windermere Way.	Whilst the site meets Green Belt purposes significantly, the site can make a contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated to some degree through site design. The openness and permanence of the wider Green Belt are likely to be compromised through the creation of a new built edge. The harm to the Green Belt would need to be balanced against the sustainability of the site as a development location.
MI/18 Land North of	CONTRIBUTION The site is part of Green Belt	The scale and type of development (assuming for employment use)	Whilst the site meets Green Belt purposes moderately due to its location, the site can make a contribution to meeting the

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Exceptional Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
Wilden Industrial Estate	which is judged to make a significant contribution to maintaining the separation between Kidderminster and Stourport. In principle, erosion of the Green Belt in this location is damaging but the scale of the extension and its close relationship with existing development to the south would not constitute significant harm to Green Belt purposes overall.	would have a minimal effect on the openness of the Green Belt in this location.	development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated through site design. The openness and permanence of the wider Green Belt will not be compromised. The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.
MI/36 Firs Yard, Wilden Lane	CONTRIBUTION Notwithstanding the small scale and visually enclosed character of the site, it nevertheless makes a Contribution to Green Belt purposes through its role in maintaining openness in this locality, despite its previously developed character.	The small scale and largely visually enclosed nature of the site, along with its previously developed character, means that harm to the Green Belt arising from its intended use as a gypsy and traveller site (in situ) would be limited.	Whilst the site meets Green Belt purposes moderately due to its location, the site can make a contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated through site design. The openness and permanence of the wider Green Belt will not be compromised. The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.

Bewdley

8.28 Bewdley is a smaller market town to that of Stourport and offers a more limited range of services and facilities. Bewdley is considered to be less sustainable and less suitable for growth because of a number of factors. Bewdley has a range of small local shops but does not have a large supermarket; therefore, Bewdley residents are reliant upon travelling to Kidderminster to access such facilities. Access to employment opportunities is also more limited in Bewdley, with many residents having to commute. Bewdley's ability to accommodate further growth is restricted for a number of reasons; there is little brownfield land available to develop either within or surrounding Bewdley, also topography, proximity to the River Severn and floodplain. Bewdley is therefore considered to be the least sustainable of the three towns as a settlement for new development and growth is therefore more limited.

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Exceptional Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
WA/BE/1 Stourport Road Triangle	CONTRIBUTION The site makes a contribution to the Green Belt in this location by virtue of its location in the gap between Bewdley and Stourport and visual	The likely effect on openness is judged to be limited given the location and bounded character of the site. Of greater potential significance is the role of the site as part	The site meets Green Belt purposes moderately. The site can make an important contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated through site design and the boundaries

	connection to the wider open countryside which is part of that gap. However, the strongly bounded character of the site limits the effects of sprawl or encroachment.	of the southern gateway to Bewdley and the effect that a concentrated development of 80 units could have, particularly given the rising topography of the ground.	would be permanent and defensible in accordance with NPPF requirements. The openness and permanence of the wider Green Belt will not be compromised. The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.
WA/BE/3 Catchem's End	SIGNIFICANT CONTRIBUTION Overall, and cumulatively, the site makes a significant contribution to Green Belt purposes because of its role as part of the wider tract of land separating Bewdley, Stourport and Kidderminster, its role as part of the gateway to Bewdley, a role in preventing wider encroachment and sprawl. Development would reduce openness by bringing the edge of Bewdley southeastwards to meet the A456, although this would act as a long-term edge.	The likely effect on openness is judged to be significant, reflecting the open countryside character (albeit containing development along Kidderminster Road) and its exposure on rising land as part of the gateway to Bewdley. Development would uncharacteristically urbanise this land.	Whilst the site meets Green Belt purposes significantly, the site can make an important contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated to some degree through site design. The openness and permanence of the wider Green Belt are likely to be compromised through the creation of a new built edge, along with an elevated area of isolated Green Belt to the southwest (bounded by a railway line) with an unclear role. The strategic gap between Kidderminster would be diminished. The harm to the Green Belt would need to be balanced against the sustainability of the site as a development location.
WA/BE/5 Land south of Habberley Road	CONTRIBUTION The overall contribution to Green Belt purposes of the site is mixed. Whilst it is relatively small and is an extension of the existing urban edge, it is nevertheless serves to contain the eastward expansion of Bewdley into the critical gap between development in this location and the built edge of Kidderminster. The presence of the hotel imparts a semi-urbanised character to the land, and development would add to this impression further reducing the gap between the towns, even though the site is reasonably well enclosed visually.	Development would have a moderate effect on openness, reflecting its role in the wider context of the gap between Bewdley and Kidderminster. Notwithstanding the presence of the hotel and extensive grounds to the northeast, development would extend the urban edge beyond a simple 'rounding-off'.	The site meets Green Belt purposes moderately. The site can make an important contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated through site design. The openness and permanence of the wider Green Belt are likely to be compromised to a modest degree through the creation of a new built edge and the narrowing of the gap between Kidderminster and Bewdley. The separation function of the wider Green Belt would continue. The harm to the Green Belt would need to be balanced against the sustainability of the site as a development location.

Villages and Previously Developed Sites

8.29 The district also has a number of outlying villages and hamlets and their level of service provision varies. The site allocation (WFR/CB/3) adjacent to Blakedown railway station has been chosen because of its close proximity to an existing public transport hub. The allocation for station car parking will provide a park and ride facility and create a sustainable transport hub (as there is very limited car parking capacity at the station at present). The residential allocation will help to address an identified

local housing need in a location with access to a sustainable mode of transport.

Sites to be Removed from the Green Belt

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Exceptional Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
WFR/CB/3 Land off Station Drive, Blakedown	CONTRIBUTION The site makes a contribution to Green Belt purposes because of its containment of Blakedown particularly along the A456 Birmingham Road.	The high degree of physical and visual containment limits the impact of development on the Green Belt, although this is a gateway site into Blakedown which is locally significant in turn demanding particular attention to edge treatment, built density and massing.	The site meets Green Belt purposes moderately. The site can make a contribution to meeting the development needs of the District. The impacts on the wider Green Belt can be mitigated through site design. The benefits associated with the release of the site and its subsequent development outweigh the disbenefits. In particular, the creation of a sustainable transport hub at Blakedown railway station is critical to the transport policies in the plan and the wider sustainability of Wyre Forest District.

Sites to Retain Washed Over Green Belt

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Very Special Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
WFR/WC/12 Lawnswood, Cookley	CONTRIBUTION The site is well contained and development would not constitute sprawl or significant encroachment into open countryside.	The openness of the countryside would be affected through the addition of built development, although this is not significant given the degree of enclosure on the site's southern boundary and opportunities for boundary treatment to reduce this impact.	The site meets Green Belt purposes moderately. The site can make a contribution to meeting the development needs of the District. The impacts on the Green Belt can be mitigated through site design. The openness and permanence of the wider Green Belt will not be compromised. The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.
MI/24 adj. Rock Tavern, Wilden Lane	LIMITED CONTRIBUTION The site is small, part of the built extent of the village of Wilden and whilst contributing modestly to the openness of the village which is washed over by Green Belt, does not contribute to wider Green Belt purposes.	Openness of the Green Belt will be affected to the extent of the introduction of additional built form into the built-up extent of Wilden. However, the site is raised above Wilden Lane and otherwise enclosed by property boundaries meaning that the overall effect on the openness of the settlement is limited.	The site meets Green Belt purposes in a limited way. The site can make a contribution to meeting the development needs of the District. The impacts on the Green Belt can be mitigated through site design. The openness and permanence of the wider Green Belt will not be compromised. The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.
WA/UA/1 Bellman's Cross, Shatterford	CONTRIBUTION The site is part of open countryside which is vulnerable to encroachment by incremental development and	Development would compromise the openness of the Green Belt in this location through the introduction of a	Whilst the site meets Green Belt purposes moderately, the site can make a contribution to meeting the development needs of the District. The impacts on the Green Belt can be mitigated to some

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Very Special Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
	the Green Belt helps to prevent from happening, particularly in accessible locations such as adjacent to main roads.	substantial concentration of built development into an area characterised by dispersed development (notwithstanding development further along Arley Lane). Whilst development could be largely screened and physically contained, its scale would introduce a new character to this locality. If proposed for development, it would be prudent to consider retaining washed over Green Belt status in order to control potential encroachment from weak site boundaries.	degree through site design, using existing vegetated boundaries. Development is likely to compromise the openness and permanence of the adjacent Green Belt through the introduction of a relatively large area of built development and the creation of a new built edge. The harm to the Green Belt would need to be balanced against the sustainability of the site as a development location.
WA/UA/4 Allotments, Upper Arley	CONTRIBUTION The physical and visual enclosure of the site means that development would not compromise the purposes of the Green Belt strategically or locally and the effect on openness would not be significant, being an extension of the existing built edge of the village.	The effect of development on openness is likely to be limited, reflecting the scale and physical and visual enclosure of the site.	The site meets Green Belt purposes in respect of encroachment and setting, although there is a high degree of visual enclosure and a moderate degree of physical enclosure. The site can make a contribution to meeting the development needs of the District. The impacts on the Green Belt can be mitigated through site design. The openness and permanence of the wider Green Belt are unlikely to be compromised. The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.
WA/UA/6 Red Lion Car Park	CONTRIBUTION The site is part of open countryside which is vulnerable to encroachment by incremental development and the Green Belt helps to prevent from happening, particularly in accessible locations such as adjacent to main roads. However, the size and the bounded character of the site means that overall, there is a contribution to the Green Belt, albeit modest.	Development of the site would have limited effect of the openness of the Green Belt, reflecting the size of the site, its strongly bounded character and relationship with development across Lion Lane. If proposed for development, it would be prudent to consider retaining washed over Green Belt status in order to control potential encroachment from weak site boundaries.	The site meets Green Belt purposes moderately. The site can make a contribution to meeting the development needs of the District. The impacts on the Green Belt can be mitigated through site design. The openness and permanence of the wider Green Belt will not be compromised. The benefits associated with the development the site and its subsequent development outweigh the disbenefits.
WFR/CC/8 Fold Farm, Chaddesley Corbett	CONTRIBUTION The site contributes to the openness and character of the village being part of the Conservation Area.	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	Whilst the site meets Green Belt purposes moderately, the site can make a contribution to meeting the development needs of the District. The impacts on the Green Belt can be mitigated to some degree through site design. The openness and permanence of the wider Green Belt are likely to be

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Very Special Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
		<p>greater and would have to be subject to a separate historic environment evaluation.</p> <p>If proposed for development, it would be prudent to consider retaining washed over Green Belt status in order to control potential encroachment from weak site boundaries.</p>	<p>compromised to a modest degree through the creation of a new built edge.</p> <p>The harm to the Green Belt would need to be balanced against the sustainability of the site as a development location.</p>
<p>WFR/WC/36</p> <p>Rock Tavern Car Park, Caunsall</p>	<p>LIMITED CONTRIBUTION</p> <p>The size and location of the site means that its contribution to the Green Belt is minimal, aside from being part of the washed over settlement of Caunsall where openness is sought to be maintained.</p>	<p>The site is part of the built extent of Caunsall and makes only the most modest contribution to maintaining openness given the site's size and location. Development would not compromise the open character of the hamlet as a whole which is washed over by Green Belt.</p> <p>If proposed for development, it would be prudent to consider retaining washed over Green Belt status in order to control potential encroachment from weak site boundaries.</p>	<p>The site meets Green Belt purposes in a limited way. The site can make a contribution to meeting the development needs of the District. The impacts on the Green Belt can be mitigated through site design.</p> <p>The openness and permanence of the wider Green Belt will not be compromised.</p> <p>The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.</p>
<p>WFR/WC/37</p> <p>Land at Caunsall Road, Caunsall</p>	<p>CONTRIBUTION</p> <p>The site forms a significant part of the eastern context of Caunsall, containing the built extent of the hamlet and thereby localised extension of built development along the Caunsall Road. The site is part of open countryside to the east of Caunsall which is vulnerable to change through incremental development.</p>	<p>Development of the site, which is weakly bounded, would compromise the openness of the Green Belt in this location, reflecting its role in containing the eastern extent of Caunsall. The visual exposure of the site as part of the northern valley side of the River Stour means that the physical and visual impact of development would be amplified.</p> <p>If proposed for development, it would be prudent to consider retaining washed over Green Belt status in order to control potential encroachment from weak site boundaries.</p>	<p>Whilst the site meets Green Belt purposes moderately, the site can make a contribution to meeting the development needs of the District. The impacts on the Green Belt can be mitigated to some degree through site design.</p> <p>Development is likely to compromise the openness and permanence of the adjacent Green Belt through extension into open countryside and the creation of a new built edge.</p> <p>The harm to the Green Belt would need to be balanced against the sustainability of the site as a development location.</p>

Previously Developed Sites

Site	Contribution to the Green Belt	Effect of Development on the Green Belt	Very Special Circumstances, Mitigation and Residual Effects on the Surrounding Green Belt
PDL SITE Cursley Distribution Park	CONTRIBUTION The site contributes to the Green Belt in this location being part of open countryside between Kidderminster and Droitwich. However, the scale of current development is such that any change in use on the same footprint is unlikely to compromise the wider function of the Green Belt in this location.	A denser building footprint would be balanced against a reduction in building height in what is an open rural landscape which hosts a number of such visually prominent distribution-related developments.	Whilst the site meets Green Belt purposes moderately due to its location, the site can make a contribution to meeting the development needs of the District. The impacts on the Green Belt can be mitigated through site design. Intensification of development, through massing and height, could compromise the role of the wider Green Belt in maintaining openness. The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.
PDL SITE Rushock Trading Estate	CONTRIBUTION The site contributes to the Green Belt in this location being part of open countryside between Kidderminster and Droitwich. However, the scale of current development is such that any change in use on the same footprint is unlikely to compromise the wider function of the Green Belt in this location.	A denser building footprint would be balanced against a reduction in building height in what is an open rural landscape which hosts a number of such visually prominent distribution-related developments.	Whilst the site meets Green Belt purposes moderately due to its location, the site can make a contribution to meeting the development needs of the District. The impacts on the Green Belt can be mitigated through site design. Intensification of development, through massing and height, could compromise the role of the wider Green Belt in maintaining openness. The benefits associated with the release of the site and its subsequent development are judged to outweigh the disbenefits.
PDL SITE West Midlands Safari Park	SIGNIFICANT CONTRIBUTION A combination of roles makes the overall contribution of this site to Green Belt purposes significant, reflecting its role as part of the land which separates Kidderminster and Bewdley and providing part of the eastern context for Bewdley.	Notwithstanding the extent and long-standing character of built development already associated with the site, the Green Belt is nevertheless vulnerable to intensification. This would affect both the direct role of the site in its role in preventing the merger of towns but also its role in combination with land to the north of the A456 and to the east and southeast.	Whilst the site meets Green Belt purposes significantly, the site can make a contribution to meeting the development needs of the District in a relatively sustainable location. The impacts on the Green Belt can be mitigated to some degree through site design. Intensification of development, through massing and height, could compromise the role of the wider Green Belt in maintaining openness. The harm to the Green Belt would need to be balanced against the sustainability of the site as a development location.

9. Local Plan (2016 – 2036) and Green Belt compensatory improvements

- 9.1 As discussed earlier in this topic paper in section 3, the NPPG was updated in July 2019 to include advice on the role of the Green Belt in the planning system and refers to Green Belt and compensatory improvements. As section 3 of this topic paper explains, the Local Plan (2016 – 2036) was prepared in advance of the NPPG update being published. However, the Local Plan does meet the NPPG advice through the provision of Green Belt compensation improvements. These are set out below. Together, these compensatory improvements will help to offset some of the harm to the Green Belt and provide environmental and social benefits to communities within the district.

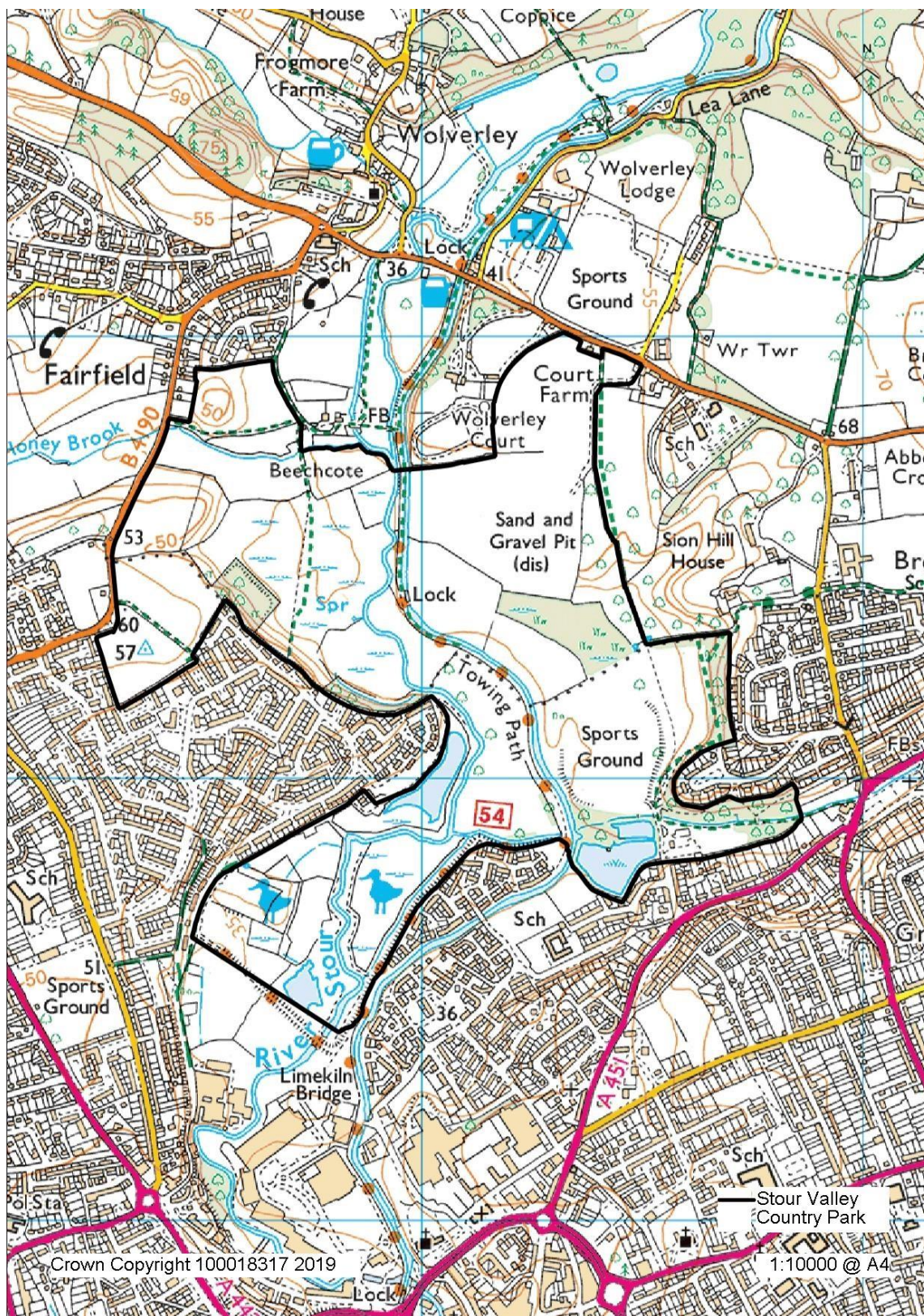
Stour Valley Country Park

- 9.2 The Local Plan (2016 – 2036) includes Policy 14 – Green Infrastructure as a strategic policy in the plan. Policy 14 safeguards an area of Green Belt land shown on the Policies Map to the north of Kidderminster Town Centre in the Stour Valley, for future development as a Country Park. Proposals for development which would prejudice the provision of a country park in this area would not be permitted. The delivery of the Stour Valley Country Park is a long-standing aspiration for Wyre Forest District. The completion of the Kidderminster Flood Alleviation Scheme presents the opportunity to create a new country park to the north of Kidderminster. The creation of a new country park would provide a new link between the town centre and the existing green corridor running from Springfield Park, Broadwaters, and Hurcott Pool via the important wetlands of the Stour and Blakedown Brook Valleys. The site will remain safeguarded in order to allow the future delivery of the Stour Valley Country Park.
- 9.3 The Council originally published its intention to create a Stour Valley Country Park in the 1996 Adopted District Local Plan and has continued to deliver elements of it since that date. This intention was seen in a very favourable light by the public as part of the consultation process for the 1996 Plan. This proposal was reconfirmed in Policy LR6 of the 2004 Adopted Local Plan and again under Policy SAL.UP3 ‘Providing a Green Infrastructure Network’ of the Site Allocations & Policies Local Plan (2013).
- 9.4 Since its initial conception, areas of the country park have been assembled as opportunities presented themselves. Puxton Marsh was the first area of land to be added to the country park portfolio. This land was acquired through a Section 106 agreement in 1997. Stourvale wetland was then acquired through a Section 106 agreement in 2001, with the southern half of Puxton Marshes SSSI and Stourvale SSSI taken under

lease by WFDC in 2013. In 2017 there were 142,000 visitors to the site (2017 CRC Ecology Reserves Visitor Survey). The land currently included in the country park has attracted several grants from both Natural England and the Environment Agency. These various monies have made the managing of the land a cost neutral operation for the District Council.

- 9.5 In 1999 a flood attenuation bund was installed by the Environment Agency causing increased instances of flooding on the land. However, these flood events served the function of delaying the arrival of flood waters into Kidderminster town and prevented the catastrophic flooding of the town centre as seen in other towns in 2004 and 2007. This bund structure also opened up access routes onto and through the country park. Extending the country park into the northern area would allow third party organisations such as the Environment Agency future opportunities to increase the flood defence and ecosystem services function of these wetlands to further protect properties from the effects of flooding.
- 9.6 Currently, the country park provides informal countryside recreation and attracts 142,000 visits per annum (this figure excludes Springfield Park as no visitor data available). The land is some of the most ecologically valuable in Worcestershire and is looked after in a manner that has seen biodiversity flourish. Under the tenure of Wyre Forest District Council, the site has moved from unfavourable to a favourable condition thereby helping to meet national targets for nature conservation.
- 9.7 The safeguarding of the northern extension of Puxton Marsh would potentially allow in the future (by acquisition through S106 agreement) communities in both the Franche and Wolverley areas of Kidderminster access to a stretch of countryside and to plan and create attractive circular walks from their doorsteps. The acquisition of the northern area would also allow the utilisation of the existing foot bridges across the River Stour creating a high-quality medium distance circular walk through the Springfield Park which would greatly increase the land's recreational appeal. The ecological condition of the land is currently poor with inappropriate management, including over-grazing, draining and nitrification. If these practices continue, the biodiversity of this northern area will be lost to the district. By safeguarding the area shown on the Policies Map in the Stour Valley for future development as a Country Park, it would open up a resource to the people of Kidderminster and safeguarding an ecologically important resource for the future. Figure 4 shows the full extent of the Stour Valley Country Park (as shown on the Policies Map).

Figure 4: Stour Valley Country Park



Proposed Future Development at Former Burlish Golf Course

- 9.8 The former Burlish Golf Club closed in 2017. The site is located within the Green Belt between Stourport and Kidderminster, adjacent to the A451 Stourport Road. The former golf course was surplus to requirements, as evidenced by decreasing membership numbers (see WFDC Golf Facility Review (June 2019) (OS01) for further details). The land is owned by the District Council and the previous tenants of the property went into creditor's voluntary liquidation in 2017. The Council has been in full control of the site since June 2018, after forfeiture of the tenancy. Marketing by the liquidator over a considerable period of time failed to identify a viable alternative tenant. Parts of the Burlish Park golf course have now been transferred to the Council's Wyre Forest Ranger Service to manage.
- 9.9 The evidence paper 'WFDC Proposed Future Development at Former Burlish Golf Course (June 2019) (OS02)' sets out the overall vision for the former golf course site. The vision is to create a new Country Park in this area of Green Belt land. This will reinforce the Green Belt's function as a green buffer between Stourport-on-Severn and Kidderminster and will offer significant leisure use for the public. The land would be managed in a similar way to the adjacent Burlish Top Nature Reserve. This would increase the wildlife values whilst also providing public access to Green Belt land. The vision also proposes a cycle trail which would offer a facility that is currently not available in the district. The Woodland Trust are also in detailed discussion with the Council for the creation of new woodland on site. This would involve the planting of approximately 30,000 trees.
- 9.10 Policy 33.21 Minster Road Outdoor Sports Area recognises the importance of the provision of outdoor sports facilities within this area subject to compatibility with Green Belt and landscape policies. Approximately 75 hectares of Green Belt land between Kidderminster and Stourport-on-Severn will be safeguarded for outdoor sports and recreation. The reasoned justification to Policy 33.21 states that parts of the site will be managed as a nature reserve as part of a long term vision to create a Country Park and will form an extension to the adjacent Burlish Top Nature Reserve.

Planning Obligations Supplementary Planning Document (SPD)

- 9.11 The Planning Obligations SPD was adopted by the Council in September 2016. It sets out the Council's approach to securing planning obligations and developer contributions towards physical, social and green infrastructure. A planning obligation is a legally binding agreement that a landowner signs to provide a developer contribution, normally before development commences. Planning obligations can only be required to make a planning application acceptable in planning terms; usually this

means a contribution towards, or the direct provision of, essential infrastructure.

- 9.12 The Planning Obligations SPD makes provision for off-site compensation of sites in the Green Belt. Where appropriate, the Council can seek contributions towards off-site improvements which are required directly and solely as a result of development and are necessary to make it acceptable in planning terms. The Planning Obligations SPD (paragraph 2.14) states: “This could include (but is not restricted to) new and improved road infrastructure, traffic calming, public transport improvements, cycleways, footpaths, lighting and associated landscaping. In appropriate circumstances, the District Council may also seek ongoing revenue contribution to fund the running of a service which is necessary directly as a result of the development.” At paragraph 3.5, the SPD also states: “Larger residential schemes will be expected to provide open space, sport and recreation facilities on-site. In addition, in circumstances where the development site is isolated from poorly served by existing nearby facilities, off-site public open space provision will be required. In many cases an off-site contribution is preferred to provide the best facilities for the local community.”
- 9.13 At paragraph 3.11, the SPD states: “For developments where there are existing play spaces located within the distances specified in Open Space, Sport and Recreation Assessment, it is considered appropriate for developers to provide a commuted sum payment for off-site improvements to be undertaken by the Community Well-being and Environment Directorate.”

New or enhanced walking and cycling routes and improved access to new, enhanced or existing recreational and playing field provision

- 9.14 The strategic sites in the Plan provide opportunities to enhance the local footpath and cycling network and provide links where currently there are none or very few. An example is the Kidderminster Eastern Extension where the development of the site will create a network of public footpaths to areas of Green Belt land where there is currently no public access.
- 9.15 The strategic sites will also improve access to new, enhanced or existing recreational and playing field provision. The Lea Castle development is enhancing the existing grass football pitches on site and a new 3G pitch / grass football pitch has been allocated on site as part of the masterplan scheme.
- 9.16 At paragraph 4.29 the SPD states: “Wyre Forest District supports a wide range of habitats and species which are recognised in the UK Biodiversity

Action Plan for habitats and species (UK HAPs & UK SAPs). Of particular note are the District's lowland acid/heathland communities; wetland corridors, including some of the most important wetland and wet woodland; and extensive ancient semi-natural broadleaf woodlands such as the National Nature Reserves of the Wyre Forest and Chaddesley Woods. A large area of the District falls into the Abberley and Malvern Hills Geopark" and 4.30: "Policies CP14 of the Adopted Core Strategy and SAL.UP5 of the Site Allocations and Policies Local Plan require new development to contribute to biodiversity within the District, either by enhancing opportunities within the site or making a contribution to off-site biodiversity projects."

10. Conclusion

- 10.1 The purpose of this Green Belt Topic Paper is to set out the exceptional circumstances for the proposed changes to the Green Belt within Wyre Forest District at a strategic level. In conclusion, the Council's commitment to meet in full the development requirement for the district, plus some 'headroom' flexibility to adapt to rapid change (as covered in the Housing Topic Paper (June 2020)), cannot be fulfilled in a sustainable way unless greenfield sites within the Green Belt are allocated for development. There simply are not enough brownfield sites (including under used land and buildings) to accommodate the development need in full; the need for the district can only be met sustainably if land is released from the Green Belt. Even if the Council used the lower housing need figure of 248, based on the 2014 household projections, land would still need to be released from the Green Belt to meet the need.
- 10.2 The exceptional circumstances set out in this Topic Paper justify the release of the land from the current extent of the Green Belt for development purposes. Only 2.1% of land will be lost from the Green Belt. Of this, Lea Castle Village accounts for 49% (120ha), the wider Eastern Extension area for 32% (79ha), and no other site exceeds 10ha. This approach of allocating Green Belt sites will help to prevent speculative development elsewhere in the district in less sustainable locations. By allocating a limited number of Green Belt sites in accessible locations, and for significant extensions providing critical mass to the north and east of Kidderminster, this will reduce the likelihood of piecemeal development in the district and will help to ensure that developments have adequate infrastructure and services. The site allocation adjacent to Blakedown Railway Station for car parking will increase passenger capacity on the rail network; the site is a Green Belt site that is well-served by public transport. Its release from the Green Belt is therefore consistent with NPPF para 138.
- 10.3 The Council has strived to deliver a spatial development strategy for the district which is based on a sustainable settlement hierarchy. The Council has applied a 'brownfield first' and 'Green Belt last' approach to site allocations. The site allocations chosen for the Local Plan are deemed to be in sustainable locations and have been consulted upon during the plan making process. In conclusion, the Council has applied a spatially balanced approach to reviewing the Green Belt which has enabled the Plan to deliver the Council's commitment to meet in full the housing requirement, plus some 'headroom' flexibility to adapt to rapid change, as well as addressing employment land needs for the district. As this topic paper has set out, exceptional circumstances exist which justify altering the Green Belt boundaries to meet the development needs of the district over the plan period. Land has been found within the Green Belt to meet

this need through alterations to the Green Belt boundaries in sustainable locations.

10.4 In summary, the main reasons for exceptional circumstances to justify Green Belt release are as follows:

- If Green Belt land is not released the Council would not be able to meet its development needs in full in sustainable locations. No neighbouring authority has indicated a willingness to accommodate any of the development needs for Wyre Forest District. This is mainly because they are Green Belt local authorities themselves, or they cannot accommodate their own needs and are looking to export some of their growth to their neighbouring authorities.
- The release of Green Belt land is the most sustainable option. The spatial development strategy focuses development on the most sustainable settlements within the district.
- The Plan includes two strategic site allocations which require land to be removed from the Green Belt. These two strategic sites will create the critical mass to enable a scale of development sufficient to fund new provision and avoid strain on existing facilities. The Lea Castle site is also surplus public sector land and includes previously developed land that is now derelict and underused.
- The site at Blakedown railway station that is allocated for a car park and housing will help to create a sustainable transport hub. Allocating land for a sufficient number of car parking spaces at Blakedown railway station is critical to the transport policies in the plan and the wider sustainability of Wyre Forest District.

Appendix 1: Summary of Contribution to the Green Belt and Likely Effect of Development on the Green Belt

The following table summarises the contribution of each proposed development site to the Green Belt and the likely effect of development. Note: this is a summary table extracted from a separate document which sets out a summary assessment of the sites proposed for development (Technical Note 2 – Summary of Site Assessments).

Site		Contribution to Green Belt Purpose LC = Limited Contribution, C = Contribution, SC = Significant Contribution					Overall Contribution to the Green Belt	Likely Effect of Development the Green Belt
		Sprawl	Merger	Encroachment	Setting	Overall		
FPH/27	Land adjacent Easter Park, Worcester Road	LC	LC	LC	C	LC	<p>LIMITED CONTRIBUTION</p> <p>The site makes a very limited contribution to Green Belt purposes strategically and locally, being strongly bounded on all sides and largely visually isolated from the Green Belt to the east and south. The local context, which has a strongly urbanised character, adds to the sense of disconnection of the site from Green Belt purposes.</p>	Development would have a limited effect on openness, being dominated by urban uses to the north and west. However, a degree of sensitivity in the scale and massing of development would need to be exercised given the site's place as part of the southern gateway to Kidderminster along the A449.
WFR/WC/15	Lea Castle Village – main site	C	LC	C	LC	C	<p>CONTRIBUTION</p> <p>The character of the site, being previously developed and strongly bounded physically and visually, means that the overall impact of development on Green Belt purposes would be limited. However, should development encroach beyond current developed footprint then the impact would be significantly greater, reflecting careful siting of past development on a plateau and the benefit of landscape planting containing visual impacts.</p>	The effect on openness of the Green Belt in this location would be neutral, reflecting the site's previously developed nature although this is dependent upon retention of the current development footprint, building density and height.

Site		Contribution to Green Belt Purpose LC = Limited Contribution, C = Contribution, SC = Significant Contribution					Overall Contribution to the Green Belt	Likely Effect of Development the Green Belt
		Sprawl	Merger	Encroachment	Setting	Overall		
WFR/WC/32	Lea Castle Village – land to the east	SC	LC	C	C	SC	<p>SIGNIFICANT CONTRIBUTION</p> <p>Overall, the site makes a significant contribution to the Green Belt through its role in safeguarding the countryside from encroachment (clearly being visually and functionally part of the open countryside to the north of Kidderminster) and sprawl along the A451. Development would have a significant effect on openness reflecting the partial enclosure of the site and its visually sensitivity creating a fundamentally new character to this gateway to Kidderminster.</p>	Development is judged to have a significant effect on the openness of the Green Belt in this location, being on the flanks of rising land which is exposed to the south and south east. The land is part of the north eastern gateway to Kidderminster and notwithstanding the presence of the Lea Castle site immediately to the north west, would introduce development into open countryside.
WFR/WC/33	Lea Castle Village – land to the west	C	LC	C	LC	C	<p>CONTRIBUTION</p> <p>The site contributes to the role of the wider Green Belt, being part of open countryside to the north of Kidderminster. The land forms the principal context of the northern gateway to Kidderminster along the A449 Wolverhampton Road and development would alter the relationship between town and country in this location.</p>	The site contributes to the openness of the countryside in this locality reflecting its scale and orientation, despite being enclosed on two sides by built development. There is a visual connection with open land to the west, which together with this land forms a distinct countryside context for the northwest of Kidderminster.
WFR/WC/34	Lea Castle Village – land to the north	C	LC	C	LC	C	<p>CONTRIBUTION</p> <p>Whilst the site is physically related to the carefully located and screened Lea Castle Hospital site and development along Lea Castle Drive, it is nevertheless related in character and orientation to the wider open countryside to the north. Development would</p>	Development, whilst bounded on all sides, would intrude upon the wider openness of the Green Belt in this location, by introducing a new urban edge into land which visually related and oriented to the open countryside to the north, rather than existing development immediately to the south.

Site		Contribution to Green Belt Purpose LC = Limited Contribution, C = Contribution, SC = Significant Contribution					Overall Contribution to the Green Belt	Likely Effect of Development the Green Belt
		Sprawl	Merger	Encroachment	Setting	Overall		
							introduce a new development.	
LI/10	Land r/o Zortech Avenue	C	C	C	LC	C	<p>CONTRIBUTION</p> <p>Whilst the site is of a relatively modest scale, it is nevertheless part of wide land (strategic parcel SW4) which makes a Significant Contribution to Green Belt purposes overall, reflecting its size and strategic location between Kidderminster, Bewdley and Stourport. As such the parcel makes a Contribution to the Green Belt by containing the urban edge of Kidderminster, in combination with other land.</p>	<p>Development would result in the extension of the built edge of Kidderminster into open land to the southwest. As such this would harm physical openness and to a lesser extent visual openness. The site, however, in combination with surrounding land, could lend itself to redevelopment which incorporates landscape and nature conservation enhancement which complements the wider Green Belt.</p> <p>Note: development to be considered in relation to adjacent sites LI/12 and LI/13.</p>
LI/11	Land west of former school site Coniston Crescent	C	SC	C	LC	SC	<p>SIGNIFICANT CONTRIBUTION</p> <p>The site is part of the remaining open land between Stourport and Kidderminster, the erosion of which would further narrow the already limited gap between the two settlements. Development would have to be considered in the context of proposals on an adjacent site.</p>	<p>The site and its wider context is characterised by a high degree of visual exposure which would be compromised by development, particularly in respect of the unbounded northeastern edge. Here, despite 'rounding-off' of the built edge, development would represent an extension into local countryside.</p>
LI/12	Former Burlish Golf Course Clubhouse	C	C	C	LC	C	<p>CONTRIBUTION</p> <p>Whilst the site is of a relatively modest scale, it is nevertheless part of wide land (strategic parcel SW4) which makes a Significant Contribution to Green Belt purposes overall, reflecting its size and strategic location between Kidderminster, Bewdley and Stourport. As such the parcel makes a Contribution to the Green Belt by containing the urban edge of</p>	<p>Development would result in the extension of the built edge of Kidderminster into open land to the southwest. As such this would harm physical openness and to a lesser extent visual openness. The site, however, in combination with surrounding land, could lend itself to redevelopment which incorporates landscape and nature conservation enhancement which complements the wider Green Belt.</p> <p>Note: development to be considered in relation to adjacent sites LI/10 and LI/13.</p>

Site		Contribution to Green Belt Purpose LC = Limited Contribution, C = Contribution, SC = Significant Contribution					Overall Contribution to the Green Belt	Likely Effect of Development the Green Belt
		Sprawl	Merger	Encroachment	Setting	Overall		
							Kidderminster.	
LI/13	Land Off Zortech Avenue	C	C	C	LC	C	<p>CONTRIBUTION</p> <p>Whilst the site is of a relatively modest scale, it is nevertheless part of wide land (strategic parcel SW7) which makes a Significant Contribution to Green Belt purposes overall, reflecting its size and strategic location between Kidderminster, and Stourport. As such the parcel makes a Contribution to the Green Belt by containing the urban edge of Kidderminster.</p>	<p>Development would result in the extension of the built edge of Kidderminster into open land to the southwest. As such this would harm physical openness and to a lesser extent visual openness. The site, however, in combination with surrounding land, could lend itself to redevelopment which incorporates landscape and nature conservation enhancement which complements the wider Green Belt. A significant issue relates to the definition of an outer boundary to the site, being currently undefined to the southwest.</p> <p>Note: development to be considered in relation to adjacent sites LI/10 and LI/12.</p>
MI/18	Land North of Wilden Industrial Estate	LC	LC	C	LC	C	<p>CONTRIBUTION</p> <p>The site is part of Green Belt which is judged to make a significant contribution to maintaining the separation between Kidderminster and Stourport. In principle, erosion of the Green Belt in this location is damaging but the scale of the extension and its close relationship with existing development to the south would not constitute significant harm to Green Belt purposes overall.</p>	<p>The scale and type of development (assuming for employment) would have a minimal effect on the openness of the Green Belt in this location.</p>
MI/36	Firs Yard, Wilden Lane	LC	LC	C	LC	C	<p>CONTRIBUTION</p> <p>Notwithstanding the small scale and visually enclosed character of the site, it nevertheless makes a Contribution to Green Belt purposes through its role in maintaining openness in this locality, despite its previously developed</p>	<p>The small scale and largely visually enclosed nature of the site, along with its previously developed character, means that harm to the Green Belt arising from its intended use as a gypsy and traveller site (in situ) would be limited.</p>

Site		Contribution to Green Belt Purpose LC = Limited Contribution, C = Contribution, SC = Significant Contribution					Overall Contribution to the Green Belt	Likely Effect of Development the Green Belt
		Sprawl	Merger	Encroachment	Setting	Overall		
							character.	
MI/38	School Site, Coniston Crescent	C	SC	C	LC	SC	<p>SIGNIFICANT CONTRIBUTION</p> <p>The site is part of the remaining open land between Stourport and Kidderminster, the erosion of which would further narrow the already limited gap between the two settlements. Development would have to be considered in the context of proposals on an adjacent site – land off Windermere Way.</p>	Although part of a former school, the land retains an open aspect and visual relationship with the former golf course to the northwest and allotments to the northeast. Development would impinge upon the openness of the land and would, on its own, be an incongruous extension of the built edge of Bewdley.
OC/5	Land at Husum Way	C	LC	C	C	C	<p>CONTRIBUTION</p> <p>Overall, the site contributes to the Green Belt in its contribution to safeguarding the countryside from encroachment (being visually interconnected with the wider open countryside) and although having a limited role in preventing sprawl in itself, in combination with land to the east has a more significant role.</p>	Development would not have a significant effect on openness, given the strongly bounded character of the site, although it is visually sensitive and development would create a new character to this gateway site.
OC/6	Land east of Offmore	SC	LC	C	LC	SC	<p>SIGNIFICANT CONTRIBUTION</p> <p>The site is part of wider land to the east of Kidderminster which prevents sprawl into open countryside, and whilst the site is bounded on three sides, its eastern boundary is insubstantial. As such, the site makes a significant contribution to preventing sprawl and more broadly the encroachment of the urban area into the open countryside.</p>	Whilst the site is a direct extension of the built edge of Kidderminster, there is no current eastern boundary. The openness of the, both physically and visually would be compromised, Particularly given the rising topography to the east. Significant mitigation would be required to define a new eastern edge of the town in this location.

Site		Contribution to Green Belt Purpose LC = Limited Contribution, C = Contribution, SC = Significant Contribution					Overall Contribution to the Green Belt	Likely Effect of Development the Green Belt
		Sprawl	Merger	Encroachment	Setting	Overall		
OC/12	Comberton Lodge Nursery	C	LC	LC	LC	C	<p>CONTRIBUTION</p> <p>Whilst of a small scale and enclosed character, the site is nevertheless part of open countryside to the north of the Comberton Road which is sensitive to change through new development. The site is part of the wider parcel E1 which was judged to make an overall Contribution to Green Belt purposes.</p>	Development would compromise the openness of the Green Belt through the introduction of built form into predominantly open countryside to the north of Comberton Road. However, the size of the site along with its strongly bounded and visually enclosed character means that the degree of this compromise would be limited.
OC/13N	Land at Stone Hill North	SC	C	C	LC	C	<p>CONTRIBUTION</p> <p>The site overall makes a contribution to Green Belt purposes by virtue of its role as open countryside containing the built edge of Kidderminster. In the absence of clear, significant boundaries, development would represent encroachment and sprawl into open countryside which could only be overcome through masterplanning which considered the development in a wider context which attended to the southeastern edge of the town more generally. Whilst there are few visual receptors in this locality and the site is generally well screened from the A448, development would create a fundamentally new relationship between town and country.</p>	In the absence of clear, significant boundaries, development would represent encroachment and sprawl into open countryside which could only be overcome through masterplanning which considered the development in a wider context which attended to the southeastern edge of the town more generally. Whilst there are few visual receptors in this locality and the site is generally well screened from the A448, development would create a fundamentally new relationship between town and country.
WA/BE/1	Stourport Road Triangle	C	C	C	SC	C	<p>CONTRIBUTION</p> <p>The site makes a contribution to the Green Belt in this location by virtue of its location in the gap between Bewdley and Stourport and visual connection to the wider open countryside which</p>	The likely effect on openness is judged to be limited given the location and bounded character of the site. Of greater potential significance is the role of the site as part of the southern gateway to Bewdley and the effect that a concentrated development of 80 units could have,

Site		Contribution to Green Belt Purpose LC = Limited Contribution, C = Contribution, SC = Significant Contribution					Overall Contribution to the Green Belt	Likely Effect of Development the Green Belt
		Sprawl	Merger	Encroachment	Setting	Overall		
							is part of that gap. However, the strongly bounded character of the site limits the effects of sprawl or encroachment.	particularly given the rising topography of the ground.
WA/BE/3	Catchem's End	C	SC	C	SC	SC	SIGNIFICANT CONTRIBUTION Overall, and cumulatively, the site makes a significant contribution to Green Belt purposes because of its role as part of the wider tract of land separating Bewdley, Stourport and Kidderminster, its role as part of the gateway to Bewdley, a role in preventing wider encroachment and sprawl. Development would reduce openness by bringing the edge of Bewdley southeastwards to meet the A456, although this would act as a long-term edge.	The likely effect on openness is judged to be significant, reflecting the open countryside character (albeit containing development along Kidderminster Road) and its exposure on rising land as part of the gateway to Bewdley. Development would uncharacteristically urbanise this land.
WA/BE/5	Land south of Habberley Road	C	SC	C	C	C	CONTRIBUTION The overall contribution to Green Belt purposes of the site is mixed. Whilst it is relatively small and is an extension of the existing urban edge, it is nevertheless serves to contain the eastward expansion of Bewdley into the critical gap between development in this location and the built edge of Kidderminster. The presence of the hotel imparts a semi-urbanised character to the land, and development would add to this impression further reducing the gap between the towns, even though the site is reasonably well enclosed visually.	Development would have a moderate effect on openness, reflecting its role in the wider context of the gap between Bewdley and Kidderminster. Notwithstanding the presence of the hotel and extensive grounds to the northeast, development would extend the urban edge beyond a simple 'rounding-off'.
WA/KF/3	Land at Low	SC	LC	SC	LC	SC	SIGNIFICANT CONTRIBUTION	Whilst the site is small and nominally adjacent to the urban edge of Kidderminster, it is nevertheless exposed

Site		Contribution to Green Belt Purpose LC = Limited Contribution, C = Contribution, SC = Significant Contribution					Overall Contribution to the Green Belt	Likely Effect of Development the Green Belt
		Sprawl	Merger	Encroachment	Setting	Overall		
	Haberley						The site forms part of the arc of Green Belt which contains the northerly extent of Kidderminster, limiting extension of the contiguous built-up area of the town into open countryside. As such, and in combination with the wider Green Belt in this locality, the site makes a significant contribution to Green Belt purposes of containing sprawl and preventing encroachment.	visually and physically, being bounded by an insubstantial hedge to the north west and thereby physically and visually connected to the wider open countryside.
WFR/CB/3	Land off Station Drive, Blakedown	C	LC	C	C	C	CONTRIBUTION The site makes a contribution to Green Belt purposes because of its containment of Blakedown particularly along the A456 Birmingham Road.	The high degree of physical and visual containment limits the impact of development on the Green Belt, although this is a gateway site into Blakedown which is locally significant in turn demanding particular attention to edge treatment, built density and massing.
WFR/WC/12	Lawnswood, Cookley	LC	LC	C	LC	C	CONTRIBUTION The site is well contained and development would not constitute sprawl or significant encroachment into open countryside.	The openness of the countryside would be affected through the addition of built development, although this is not significant given the degree of enclosure on the site's southern boundary and opportunities for boundary treatment to reduce this impact.
WFR/WC/18	Sion Hill School site	LC	LC	LC	LC	LC	LIMITED CONTRIBUTION Development of the site would not compromise the purposes of the Green Belt strategically or locally, because of its scale and containment physically and visually.	There would be an effect on openness because of the introduction of built form into open land, but visual containment and previous development on the western part of the site reduces this impact.
MI/24	adj. Rock Tavern, Wilden Lane	LC	LC	LC	LC	LC	LIMITED CONTRIBUTION The site is small, part of the built extent of the village of Wilden and whilst contributing	Openness of the Green Belt will be affected to the extent of the introduction of additional built form into the built-up extent of Wilden. However, the site is raised above

Site		Contribution to Green Belt Purpose LC = Limited Contribution, C = Contribution, SC = Significant Contribution					Overall Contribution to the Green Belt	Likely Effect of Development the Green Belt
		Sprawl	Merger	Encroachment	Setting	Overall		
							modestly to the openness of the village which is washed over by Green Belt, does not contribute to wider Green Belt purposes.	Wilden Lane and otherwise enclosed by property boundaries meaning that the overall effect on the openness of the settlement is limited.
WA/UA/1	Bellman's Cross, Shatterford	C	LC	C	LC	C	CONTRIBUTION The site is part of open countryside which is vulnerable to encroachment by incremental development and the Green Belt helps to prevent from happening, particularly in accessible locations such as adjacent to main roads.	Development would compromise the openness of the Green Belt in this location through the introduction of a substantial concentration of built development into an area characterised by dispersed development (notwithstanding development further along Arley Lane). Whilst development could be largely screened and physically contained, its scale would introduce a new character to this locality. If proposed for development, it would be prudent to consider retaining washed over Green Belt status in order to control potential encroachment from weak site boundaries.
WA/UA/4	Allotments, Upper Arley	LC	LC	C	C	C	CONTRIBUTION The physical and visual enclosure of the site means that development would not compromise the purposes of the Green Belt strategically or locally and the effect on openness would not be significant, being an extension of the existing built edge of the village.	The effect of development on openness is likely to be limited, reflecting the scale and physical and visual enclosure of the site.
WA/UA/6	Red Lion Car Park	LC	LC	C	LC	C	CONTRIBUTION The site is part of open countryside which is vulnerable to encroachment by incremental development and the Green Belt helps to prevent from happening, particularly in accessible locations such as adjacent to main roads. However, the size and the bounded character of the site means that overall, there is	Development of the site would have limited effect of the openness of the Green Belt, reflecting the size of the site, its strongly bounded character and relationship with development across Lion Lane. If proposed for development, it would be prudent to consider retaining washed over Green Belt status in order to control potential encroachment from weak site boundaries.

Site		Contribution to Green Belt Purpose LC = Limited Contribution, C = Contribution, SC = Significant Contribution					Overall Contribution to the Green Belt	Likely Effect of Development the Green Belt
		Sprawl	Merger	Encroachment	Setting	Overall		
							a contribution to the Green Belt, albeit modest.	
WFR/CC/8	Fold Farm, Chaddesley Corbett	LC	LC	LC	C	C	<p>CONTRIBUTION</p> <p>The site contributes to the openness and character of the village being part of the Conservation Area.</p>	<p>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.</p> <p>If proposed for development, it would be prudent to consider retaining washed over Green Belt status in order to control potential encroachment from weak site boundaries.</p>
WFR/WC/36	Rock Tavern Car Park, Caunsall	LC	LC	LC	LC	LC	<p>LIMITED CONTRIBUTION</p> <p>The size and location of the site means that its contribution to the Green Belt is minimal, aside from being part of the washed over settlement of Caunsall where openness is sought to be maintained.</p>	<p>The site is part of the built extent of Caunsall and makes only the most modest contribution to maintaining openness given the site's size and location. Development would not compromise the open character of the hamlet as a whole which is washed over by Green Belt.</p> <p>If proposed for development, it would be prudent to consider retaining washed over Green Belt status in order to control potential encroachment from weak site boundaries.</p>
WFR/WC/37	Land at Caunsall Road, Caunsall	C	LC	C	LC	C	<p>CONTRIBUTION</p> <p>The site forms a significant part of the eastern context of Caunsall, containing the built extent of the hamlet and thereby localised extension of built development along the Caunsall Road. The site is part of open countryside to the east of Caunsall which is vulnerable to change through incremental development.</p>	<p>Development of the site, which is weakly bounded, would compromise the openness of the Green Belt in this location, reflecting its role in containing the eastern extent of Caunsall. The visual exposure of the site as part of the northern valley side of the River Stour means that the physical and visual impact of development would be amplified.</p> <p>If proposed for development, it would be prudent to consider retaining washed over Green Belt status in order</p>

Site		Contribution to Green Belt Purpose LC = Limited Contribution, C = Contribution, SC = Significant Contribution					Overall Contribution to the Green Belt	Likely Effect of Development the Green Belt
		Sprawl	Merger	Encroachment	Setting	Overall		
								to control potential encroachment from weak site boundaries.
PDL SITE	Cursley Distribution Park	LC	LC	C	LC	C	CONTRIBUTION The site contributes to the Green Belt in this location being part of open countryside between Kidderminster and Droitwich. However, the scale of current development is such that any change in use on the same footprint is unlikely to compromise the wider function of the Green Belt in this location.	A denser building footprint would be balanced against a reduction in building height in what is an open rural landscape which hosts a number of such visually prominent distribution-related developments.
PDL SITE	Rushock Trading Estate	LC	LC	C	LC	C	CONTRIBUTION The site contributes to the Green Belt in this location being part of open countryside between Kidderminster and Droitwich. However, the scale of current development is such that any change in use on the same footprint is unlikely to compromise the wider function of the Green Belt in this location.	A denser building footprint would be balanced against a reduction in building height in what is an open rural landscape which hosts a number of such visually prominent distribution-related developments.
PDL SITE	West Midlands Safari Park	C	SC	C	C	SC	SIGNIFICANT CONTRIBUTION A combination of roles makes the overall contribution of this site to Green Belt purposes significant, reflecting its role as part of the land which separates Kidderminster and Bewdley and providing part of the eastern context for Bewdley.	Notwithstanding the extent and long-standing character of built development already associated with the site, the Green Belt is nevertheless vulnerable to intensification. This would affect both the direct role of the site in its role in preventing the merger of towns but also its role in combination with land to the north of the A456 and to the east and southeast.

