

Wyre Forest District Council Engagement Statement for Five Year Housing Land Supply at April 2020



1. National planning policy (NPPF para.73) requires that in demonstrating a five year housing land supply, the supply consists of *specific deliverable sites*. Annex 2 of the NPPF gives a definition of *deliverable* :
To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years. In particular:
 - a) *Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within 5 years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).*
 - b) *Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of planning permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years.*
2. Sites can be placed into 2 distinct categories regarding their deliverability, based on their size and planning status; with one presumed to be deliverable unless proven otherwise, and the other requiring clear evidence in order to be considered deliverable.
3. On this basis, the following sites are considered to be deliverable in principle:
 - All major sites with detailed planning permission for housing; and
 - All sites with planning permission for housing which do not involve major development sites
4. *Clear evidence* will be required in order for the following sites to be considered deliverable:
 - Major sites with outline permission
 - Sites allocated in the Local Plan with no detailed permission
 - Sites with a resolution to grant planning permission
 - Sites with permission in principle
 - Sites which are identified on a Brownfield Land Register
5. Planning Practice Guidance Para. 007 (68-007-20190722) provides further advice on what evidence may be appropriate to substantiate the deliverability of a site, noting that *such evidence, to demonstrate deliverability, may include:*
 - *Current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
 - *Firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer which confirms the developer’s delivery intentions and anticipated start and build-out rates;*
 - *Firm progress with site assessment work; or*
 - *Clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.*
6. The use of ‘may’ implies that the list is not exhaustive.

7. The Local Planning Authority has sought to establish a comprehensive housing trajectory that is underpinned by individual delivery timetables for all of the specific sites that make up the housing supply in Wyre Forest District, together with evidence of windfall rates.
8. The Council has undertaken a programme of engagement with landowners, agents and developers of individual sites that have the potential to contribute to the five year housing land supply or the wider housing supply over the plan period 2016 to 2036.
9. The process focussed on obtaining relevant information about sites that needed *clear evidence* to demonstrate deliverability and in particular targeted all site allocations, non-strategic housing sites, sites with outline permission or those with a resolution to grant (subject to Section 106 agreement). The engagement process also targeted major sites with detailed planning permission in order to inform the delivery programme and therefore ensure that the housing trajectory and supply is robust and as realistic as possible. The Council did not target any sites on the basis that they are included on the Brownfield Land Register (BLR). The reason for this is that the majority of sites on the Register already have planning permission in place and so have already been included in the housing supply. Many of the BLR sites without planning permission in place have been proposed as allocations in this Local Plan or are existing allocations being carried forward.
10. Engagement was carried out by email with targeted distribution to those known to be involved with individual sites. Statements of Common Ground were prepared for the two large strategic sites at Lea Castle and the Kidderminster Eastern Extension (Taylor Wimpey). A response form asking for specific information was sent out along with a covering letter explaining why the information was required. These can be found at Appendix 1. This process was also undertaken in summer 2019 where a good response was received and previously in May 2018 which had a very poor response. The April 2019 five year housing land supply report included a copy of the letter and response form sent out to developers/agents but the individual responses were not published. For completeness, those received can be found at Appendix 3. The delivery data was used to inform the updated housing trajectory included in the July 2019 Local Plan Amendments document.
11. Where a response was obtained, it was assessed to ensure that the information provided appeared to be reasonable, realistic and achievable, reflecting upon existing knowledge about a site. Where a response suggested that more confidence may be given to site deliverability, this was factored into the conclusions and delivery programmes for that site. The Council has not tried to be more optimistic about delivery rates than those given by those involved in bringing a site forward for development.
12. Where insufficient information or no response has been received from a site interest, the Council has applied realistic assumptions on the appropriate lead-in times and delivery rates. This was after the agents/developers were given further chances to provide information and still did not respond. Although the forms stated that the delivery data related to financial years (1st April to 31st March) a number of respondents evidently referred to calendar years and also referred to starts rather than completions of units. Therefore, officers have used their knowledge to tweak data based on start on site dates and total length of time required for site development. Actual responses have not been amended by officers but the data feeding into the housing trajectory has been slightly amended where there were obvious errors on the forms. In such cases, the agents/developers were contacted to discuss the perceived errors. The completed forms are included at appendix 2.

13. Where no response was forthcoming by the requested date, follow up emails were sent. In a few cases, information was gleaned from emails or phone calls or from other sources such as street naming and numbering request forms or from case officers involved with pre-application discussions.
14. Since 2016, officers from the Local Plans team have held a number of meetings with agents and landowners and interested developers for eight of the larger proposed allocations. For the largest sites, these meetings have also involved officers from Worcestershire County Council (highways, education, landscape and ecology, historic environment) together with NHS, Sport England, Worcestershire Wildlife Trust and North Worcestershire Water Management.
15. The following tables give a summary of the progress made on bringing each of the proposed allocated sites forward for development.

Kidderminster Sites

Site Ref	Location	Plannin g Ref	Comple- tions at 1/4/2020	Under construct -ion at 1/4/2020	Not yet started at 1/4/2020	Comments
AS/1	Comberton Place	17/0268 /full	15	8	0	Site expected to complete autumn 2020. Affordable rent (The Community Housing Group)
AS/3	Chester Road South Service Station	17/0617 /outl 20/0289 /full	0	0	15	Revised application for 15 (including 4 affordable flats) expected to be recommended for approval at October planning committee subject to site levels being agreed
AS/5	Victoria Carpets Sports Ground	19/0727 /full	0	18	30	Site expected to be complete by late March 2021. 100% affordable – 30 affordable rent, 18 shared ownership (Stonewater)
AS/6	Lea Street School	-	0	0	24	Buildings due to be vacated by September 2022. Victorian buildings on Local Heritage List
AS/20	North of Bernie Crossland Walk		0	0	9	Various pre-applications. Unlikely to come forward in next five years

BHS/2	Bromsgrove Street (Lion Fields)		0	0	35	Part of large scale mixed use regeneration scheme in town centre. Mostly in WFDC ownership. Awaiting outcome of Future High Streets Fund bids. Residential numbers expected to be much higher. See details in appendix 4
BHS/16	Timber Yard		0	0	55	Timber yard vacated. Local development company still trying to progress site purchase. Part of wider site in WFDC ownership
BHS/18	Blakebrook School	17/0780 /full	22	10	8	Expect to complete late 2020. 18 affordable rent, 16 shared ownership and 6 outright sales to those on housing register.
BHS/38	Kidderminster Fire Station		0	0	20	Site vacated 2019/20 and being marketed. Front building is on Local Heritage List and within Conservation Area.
BHS/39	Boucher Building				10	Vacant building in ownership of Morrison's. Being marketed by Halls. Within Conservation Area
BW/1	Churchfields	18/0285 /outl 20/0469 /dem 20/0508 /res 20/0585 /ful	0	0	246	Outline approval for up to 240 dwellings. Reserved Matters application received July 2020. Full application for additional 6 dwellings. Demolition underway summer 2020. New link road opened August 2020. Citizen Housing plans 100 dwellings for outright sale (Signature brand), 11 social & 84 affordable rent, 51 shared ownership. Scheme to go to October planning committee with immediate start on site required. Final completions planned by December 2024. Majority of affordable housing will be provided via additional grant funding as only 18 were secured via S106.

BW/2	Lime Kiln Bridge		0	0	80	WFDC own part of site and are in discussions with adjacent developer of BW/1 to bring this part of site forward. No further progress has been made with other landowner. See agent's response from 2019.
BW/3	Sladen School site		0	0	20	Department of Education has approved funding for new special school on part of the site. Application is expected in autumn 2020. Plans for remaining land are being drawn up. Likely to include supported living accommodation plus general family housing.
BW/4/N	Stourbridge Road ADR	18/0163 /full	41	34	16	Site being developed by Miller Homes. Expected to complete by end of March 2021. Includes 25 affordable dwellings. Only 9 units outstanding by August 2020
FHN/11	BT building Mill Street	19/3033 /PN	0	13	0	Building being converted under Prior Notification route rather than site being redeveloped as envisaged by site policy. Site visit late July confirmed that completion on track for autumn 2020.
FPH/5	Ambulance Station		0	0	12	Site is now vacant and up for sale.
FPH/10	Silverwoods phase 2	18/0446 /full	25	29	4	Site being developed by Bovis Homes. Expected to complete by end of March 2021. Includes 7 affordable dwellings. Just 4 affordable units outstanding by August 2020. Final parcel for family housing on British Sugar site.
FPH/15	Severn Grove Shops Rifle Range Estate		0	0	12	TCHG looking to dispose of the site. Neighbouring site has permission for redevelopment .It is possible that the same developer may be interested in taking on this site .

FPH/18	Naylor's Field Sutton Park Rise		0	0	35	Site is marked for disposal in 2021/22. Currently in County Council ownership
FPH/19	164/5 Sutton Park Road	18/0649 /outl	0	0	3	Outline approval granted Dec 18 for 3 dwellings within large rear gardens.
FPH/23	Silverwoods Extra care Phase 1	19/0127 /full	0	0	65	Contractors expected on site September 2020 with completion planned for 2021/22. This is an extension to the Berrington Court development on the adjacent parcel of land. 100% affordable development by TCHG
OC/11	Stourminster School site	19/0521 /full	0	0	57	Cameron Homes will be developing this site. S106 signed 8th September 2020. 9 affordable units - BDHT. Pre-commencement conditions have been agreed. Site clearance required. Wet woodland to be transferred to WFDC who will manage it.
WFR/W C/18	Sion Hill School site	18/0529 /full 19/0731 /full	0	11	46	TCHG are redeveloping this site as 100% affordable. Only 5 dwellings outstanding at end of July 2020. Site is expected to complete by end of March 2021.
WA/KF/ 3	Land at Low Habberley		0	0	120	Draft master plan drawn up and discussed with policy officers in December 2018 and February 2019. Technical work completed on flood risk and drainage, transport and access, tree constraints, ecological impact plus landscape and visual impact. Latest plan received Dec 2019 shows layout with 103 market and 34 affordable dwellings with 40% green infrastructure. However, response form received from agent only refers to 120 dwelling capacity

Lea Castle Village

Site Ref	Location	Plannin g Ref	Comple- tions at 1/4/2020	Under construct -ion at 1/4/2020	Not yet started at 1/4/2020	Comments
WFR/WC/ 15	Lea Castle Hospital	17/0205 /outl 19/0724 /res	0	0	600	Site of former hospital now in Homes England ownership which closed in 2008. Demolition of buildings and underground ducts was completed in October 2019. Further site investigation works undertaken in May-July 2020 to identify pockets of contamination. Reserved matters approved May 2020. Vistry Group are developing this site with Citizen Housing to provide 59 social & 100 affordable rent, 81 shared ownership and 360 dwellings for outright sale under the Linden & Bovis brands. Contractors started on site at the end of June 2020. First completions are expected in 2021. Build estimated to take 8.5 years.
WFR/WC/ 32/33/34	Lea Castle E/W/N		0	0	800	All of these sites are in Homes England ownership. They expect to appoint consultants towards the end of 2020 to draw up a detailed master plan for the wider site with submission of an outline application in late summer 2021. Further details of discussions between officers, Homes England and their agents can be found in the Statement of Common Ground

Kidderminster Eastern Extension

Site Ref	Location	Planning Ref	Completions at 1/4/2020	Under construction at 1/4/2020	Not yet started at 1/4/2020	Comments
OC/5	Land at Husum Way		0	0	30	No recent pre-applications for this site. Site owners are keen to see the land developed. Junction of Husum Way with the A456 Birmingham Road will need remodelling and part of this site may be required.
OC/12	Comberton Lodge Nursery		0	0	9	Landowners have instructed architects to draw up detailed plans for 9 detached dwellings. Topographical survey complete. PEA completed. Planning application expected by 2021.
OC/6/13N	Land east of Offmore/ Stone Hill North	19/0411 /EIASC 20/0228 /SCO	0	0	1400	Site being promoted by Taylor Wimpey. EIA Scoping Opinion requested March 2020 for proposed development comprising up to 1400 dwellings, a community hub, a primary school, green infrastructure (including pedestrian/cycle routes, areas for play, structural planting, drainage and open green space) and associated infrastructure. Regular meetings have been held between TW, their agents and consultants and officers from WFDC, WCC and others (See Statement of Common Ground). Evidence to date includes level I & II ground investigation reports (Nov. 19) and extended phase 1 habitat surveys.

Stourport-on-Severn sites

Site Ref	Location	Plannin g Ref	Comple- tions at 1/4/2020	Under construct -ion at 1/4/2020	Not yet started at 1/4/2020	Comments
AKR/2	Cheapside		0	0	72	A design brief was agreed in December 2016. This reflects the heritage of the site including its conservation area status and both designated and non-designated heritage assets. The site includes the largest vinegar works in the world as well as a former canal basin. The site has been marketed by First City Property Consultants and is sold subject to contract for a residential-led conversion/redevelopment scheme. No formal pre-application has been submitted recently.
AKR/7	Swan Hotel/Worki ng Men's Club		0	0	20	This site is an existing allocation being carried forward from the Site Allocations and Policies Local Plan. No detailed proposals have been drawn up.
AKR/10	Queens Road shops, Areley Kings		0	0	12	This existing allocation had a demolition request granted in January 2019 under 19/3002/DEM to clear the redundant garage bocks to the rear of the shops. The parade of shops has flats over so any redevelopment would see a loss of 8 flats. Land in TCHG ownership opposite is being considered in tandem with this site subject to viability. Pre-application discussions have been held.

AKR/14	Pearl Lane Areley Kings	19/0554 /EIASC	0	0	370	Site to be developed by Barratts. Regular meetings have been held with developer and their agent since 2016 with a promotional document submitted in late 2016. Separate meetings have been held with County Highways and North Worcestershire Water Management Team. Pre-application, public consultation and all required technical work is now complete. A planning application is expected late 2020.
AKR/20	Carpets of Worth				134	Permission for 159 dwellings lapsed in April 2016. Much developer interest since then. 3 existing buildings are now too dilapidated to be refurbished and will have to be demolished. Barratt Homes have had formal pre-application advice in 2019 and are undertaking public consultation summer 2020 prior to submitting application. Viability work is under way .
LI/11	Land west of former school site				200	This site was taken back into WFDC control following the closure of the Golf Course. It is now being managed by the Council's Countryside Team as part of an extension to Burlish Top Nature Reserve as it is not expected to be brought forward for development until later in the plan period.
MI/1	County Buildings				40	Most of the services operating from this site have now relocated apart from the health centre. Work started summer 2020 on replacement medical centre which will allow for this site to be marketed for disposal after 2022.

MI/5	Baldwin Road				72	Multiple approvals in place totalling some 72 dwellings. Initial application for 36 (mainly flats) was started in 2008 before developer went into administration. Remaining parcels are subject to ongoing discussions between landowner and RPs to bring forward for 100% affordable rent.
MI/6	Steatite Way	19/0150 /full			106	Taylor Wimpey started on site early summer 2020. There will be 14 dwellings for affordable rent. Completion is expected by March 2023. Sales office opened August 2020. First 8 plots released late August.
MI/7	Worcester Road Car Sales				15	Part of an existing allocation in Site Allocations & Policies Local Plan. Brownfield site. No proposals in place
MI/11	Sandy Lane Titton				10	Ecological survey undertaken as requested by WFDC as site adjoins SSSI.
MI/24	Adj. Rock Tavern Wilden				2	Site is expected to be brought forward by landowner who will build out once allocated through Local Plan.
MI/38	School site Coniston Crescent	16/0704 /EIASC			118	Taylor Wimpey are looking to redevelop site of former school and playing fields. Pre-application summer 2020. Initial site surveys completed.

Bewdley sites

Site Ref	Location	Planning Ref	Completions at 1/4/2020	Under construction at 1/4/2020	Not yet started at 1/4/2020	Comments
BR/BE /1	Bewdley Fire Station				15	It is understood that an offer has been made on the site on the basis that a mixed commercial and residential scheme is approved. Pre-application discussions held. Awaiting full application
WA/BE /1	Stourport Road Triangle				100	A number of meetings have been held with the new site owners and their agents since autumn 2018 when a vision document was produced. This includes details of assessments undertaken for ecology, landscape and visual impact, heritage, highways, acoustics and flooding/drainage. Phase 1 habitat survey completed and a constraints plan produced. Discussions between agent and officers around GI requirements and traffic impact with schools being located opposite site. Pre-application inquiry made February 2019 with further follow-up meeting in June 2020. Expect to submit outline application late 2020.
WA/BE /3	Catchem's End				80	Initial meeting held in March 2016 with Persimmon Homes who own the site. Illustrative masterplan received February 2017. Tree survey undertaken together with highways accessibility assessment and topographical survey which showed that site could be safely

						<p>accessed from Kidderminster Road without significant impact on trees along the frontage. The developers and their agent have met with Bewdley Town Council to discuss the site and the western parcel which will be dedicated as open space. A further meeting was held in May 2018 with WFDC officers to discuss play provision and housing mix. A suggested housing mix incorporating findings from Bewdley Housing Needs survey (2016) was sent to the developer. June 2018 WFDC met with Environment Agency re issues in Bewdley and discussed potential for S106 monies from the site to be used for works to Riddings Brook to alleviate flooding issues. Draft site layout August 2018 dominated by large family homes contrary to findings of HNS. August 2020 formal pre-application submitted. Layout now reflects WFDC preferred housing mix with mostly 2/3 bed houses.</p>
WA/B E/5	Land south of Habberley Road				44	<p>Meeting held with site owners and local agent September 2018. Discussed comments from WCC Highways, North Worcestershire Water Management and County ecologist. Owl Homes now taken option on site. Meeting March 2020 with owners, developer and agents. Proposed layout has slightly higher capacity than draft allocation - mostly 2/3 bed dwellings. Pedestrian access to Kidderminster Road; vehicular access from Habberley Road.</p>

Rural Wyre Forest

Site Ref	Location	Planning Ref	Completions at 1/4/2020	Under construction at 1/4/2020	Not yet started at 1/4/2020	Comments
BR/RO/2	Bill White Nurseries Lem Hill		0	0	20	Site was submitted through Call for Sites exercise at Preferred Option stage. No further progress has been made with bringing the site forward
BR/RO/21	Alton Nurseries Long Bank	18/0413/full	0	0	4	This site has permission in place for 4 dwellings. Further discussions are being held between the landowner, WFDC and the owners of Bewdley Business Park to the rear.
WA/UA/1	Bellman's Cross Shatterford		0	0	16	WFDC have conducted tree survey on site in July 2019 and confirmed TPO in August 2019 on 5 trees adjacent to village hall on Arley Lane.
WA/UA/4	Allotments Upper Arley		0	0	10	Ecological appraisal of site has shown that only part of site may be available for development and capacity is likely to be reduced
WA/UA/6	Red Lion Car Park Bridgnorth Road		0	0	2	Pre-application received for dormer bungalow on this small site on county boundary with Shropshire. Remainder of site of PH already redeveloped (in Shropshire)
WFR/CB/3	Land at Station Drive		0	0	50	A series of meetings have been held between the landowner's agent and WFDC since August 2018. A noise and vibration assessment was done in September 2018 as site sits alongside main railway line

						between Worcester and Birmingham. Masterplan from September 2018 shows 40 car parking spaces for station, 45 assisted living retirement complex plus 45 family dwellings. July 2018 landscape assessment and Green Belt assessment. Site characteristics plan discussed and proposed access arrangement August 2018. WCC Highways met agent on site October 2018 and a technical note on transport issues was produced in December 2018. Further meetings held spring 2019 including with WFDC/WCC Highways. Following these meetings the masterplan was amended to show 50 family dwellings, 30 surface parking spaces and 140 spaces on a half basement podium deck adjacent to the railway line. A further meeting was held in July 2019 to discuss the draft policy and requirements for consultation events.
WFR/ CC/8	Fold Farm Chaddesley Corbett		0	0	6	This site is being considered as a potential affordable housing site as part of the Chaddesley Corbett Neighbourhood Plan.
WFR/ WC/3 6	Rock Tavern Car Park Caunsall				3	Revised scheme for redevelopment of former PH site will require part of this site for car parking with remainder left as amenity space. (20/0103/full approved August 2020). Agent considers that remaining land could still accommodate 3 small bungalows
WFR/ WC/3	Land at Caunsall Road				4	An outline application for 5 dwellings was refused in January 2020 on the basis that the site

7	Caunsall					was not considered to be limited infill development in a village. Caunsall is washed over Green Belt and is not considered to be a village. Allocation would overcome issue of inappropriate development in the Green Belt.
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16. There are also 3 sites of over 10 dwellings which form part of the housing supply which are not allocations. Two are within Kidderminster and one is to the west of Bewdley.
17. A large conversion scheme is in progress to convert the redundant upper floors of Towers Buildings in the centre of Kidderminster into a large number of apartments including a roof top extension. Part of this building was previously used as a nightclub. As of August 2020, there were approvals in place for a total of 55 apartments with 42 being converted and expected to complete by late 2020. 29 were approved via the office to residential prior notification route. None of these apartments will be affordable. A roof top extension for a further 9 flats was recently approved in May 2020.
18. A scheme to demolish the Musketeer public house on the Rifle Range Estate in Kidderminster was approved in early April 2020. A total of 13 flats over 3 blocks will be developed. A locally-based housing developer is currently negotiating the purchase of this site.
19. The redevelopment of redundant industrial buildings at Alton Works adjacent to the Bewdley Business Park gained outline approval subject to a S106 agreement in late 2017. The applicant has gone into administration and the site owner has recently applied for Permission in Principle to redevelop the site for 21 dwellings as originally planned in 2017. The site is on the Brownfield Land Register.
20. The Submission Local Plan also has a requirement for 487 bedspaces (C2). During engagement with developers, the potential to provide land for nursing/care homes has been raised. The draft policy 31.1 Lea Castle Village vision refers to the community facility providing some C2 provision. This has been agreed with Homes England and their agents. Homes England are also considering development at a site in Stourport where officers would wish to see some C2 provision made as part of a mixed use scheme.