

## **Wyre Forest District Council's response to the questions raised within the Inspector's initial note for the Council (ED6)**

### **1) Introduction**

The following document sets out the Council's response to the Inspector's initial questions and comments. The Inspector's questions are split up as follows:

**Questions 4, 15, 16, 20 and 21** – In the following document, each of the paragraphs with the Inspector's question is highlighted in bold, with the Council's response then following.

**Questions 5, 7, 8, 9, 17, 18 and 19** – these will take the Council longer to respond to, but a timescale is shown for a response in table 1 below.

**Questions 10, 11, 12, 13, 14 and 22** will be covered at the hearing sessions and/or written exchanges, as requested by the Inspector.

### **2) Questions 4, 15, 16, 20 and 21**

**Q.4 Regarding the duty to co-operate, are there records of written requests from the Council to other local planning authorities during the Plan preparation stage that seek their help in accommodating some of Wyre Forest's development needs?**

Council response:

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 (SofCG) prepared by WFDC, which form part of the Duty to Co-operate Statement (SD10). The SofCG also include minutes of the meetings held, which includes minutes of the question being asked. The SofCG were formally signed off by Wyre Forest District Council and the relevant neighbouring authorities.

The Council had prior knowledge that some nearby local authorities were already looking to export their growth so knew they had no capacity to take on additional growth from Wyre Forest District. For further information, please see the GL Hearn work for the 'Greater Birmingham HMA Strategic Growth Study (2018)'.

[https://www.birmingham.gov.uk/downloads/download/1945/greater\\_birmingham\\_hma\\_strategic\\_growth\\_study](https://www.birmingham.gov.uk/downloads/download/1945/greater_birmingham_hma_strategic_growth_study)

**Q.15 Regarding the 4 sites where the extant Area of Development Restraint policy is proposed to be carried forward in the Plan, can the Council clarify where the evidence compares the specific environmental and other effects of this approach and the localism factor referred to in paragraph 2.11 of the Green Belt topic paper with the effects of releasing other, alternative sites from the Green Belt?**

Council response:

The localism factor referred to in paragraph 2.11 of the Green Belt topic paper can be found in the Corporate Plan here: <https://www.wyreforestdc.gov.uk/media/4987555/WFDC-Corporate-Plan-2019-2023.pdf> and the Localism Strategy found here: <https://www.wyreforestdc.gov.uk/community-wellbeing-and-environment/localism-in-wyre-forest/localism-strategy.aspx>

The Sustainability Appraisal (SA) has considered the alternative sites for development in the district. The SA has also assessed the sustainability impacts of Policy 7B 'Reserved Housing Sites in the Green Belt'.

**Q.16 Viability evidence at Plan-level has been submitted as part of the evidence and it is supplemented by the Viability topic paper (ED4), but it has not been submitted for any individual allocations (although it is noted that assessments have been carried out on the 2 largest allocations in the Plan at Lea Castle Village and Kidderminster Eastern Extension). Is evidence available to support the viability and deliverability of any of the specific allocations, particularly the strategic allocations and the larger brownfield sites that form a substantial component of the overall land supply?**

Council response

The Council will respond to the Inspector in due course on this issue.

**Q.20 How does the area illustrated in Figure 4 of the Green Belt Topic Paper relate to the notation on the submitted Policies Map for the Stour Valley Country Park? Can the boundaries of the Country Park be more clearly delineated on the submitted Policies Map?**

Council response

The area shown in Figure 4 of the Green Belt Topic Paper shows the Council's future aspirations for an extension to the Stour Valley Country Park. It omits 3 parcels of land which are included in the Stour Valley Country Park boundary shown on the Policies Map. These are shown on the attached map extract in Appendix 1. The larger southern parcel is site FHN/7 (6.0 hectares) Land North of Marlpool Estate which has been put forward for development by the landowner through the Call for Sites. The small area of woodland to the rear of 252-268 Puxton Drive also appears to be part of the same land registry parcel as the northern part of FHN/7. The small parcel on the northern edge adjacent to Fairfield is part of the 27.76 hectare landholding which includes the rest of the safeguarded northern Stour Valley Country Park extension (WFR/WC/21). Bringing forward this small parcel (0.986 hectares) for limited residential development through a subsequent Local Plan Review would enable the release of the remainder of the landholding for the Country Park. LPPO311 submitted on behalf of the landowner at Regulation 18 shows support for the proposed Stour Valley Country Park.

The boundary notation on the Policies Map is not very easy to view. There was very limited choice within the mapping system. It is intended to use a fully interactive web-based Policies Map on adoption and that should hopefully solve the issue.

Following Covid-19 and a greater realisation nationally of the importance of locally accessible green space, the Council consider it is important to safeguard this area for the Stour Valley Country Park. The Sustainability Appraisal update (June 2020) also refers to the increased use of local green space for informal recreation.

**Q.21 Policy 23A includes reference to the boundary of the Wyre Forest. Should the boundary be shown on the Policies Map?**

Council response

The policy is phrased to support tourism that is not just within the woodland but also linked to it. The policy also refers to proposals that cause an impact on the area not just within the woodland. If a boundary was defined it could prejudice further tourist attractions within the District but outside the woodland, it is for these reasons that a boundary is not shown on the Policies Map.

**3) Questions 5, 7, 8, 9, 17, 18 and 19**

**Table 1: Questions that will take longer to answer but Inspector wants an indication of timescales by 31<sup>st</sup> July**

<b>Inspector's Question</b>	<b>Council response</b>
<p><b>Q.5</b> Part A of the Plan sets out the key strategic policies. However, the overall spatial distribution and quantity of the proposed development in the District is not expressed in a single policy. This could limit understanding of the Plan as a whole and reduce its effectiveness. In this light, the Council may wish to consider including a spatial development policy that explains, including in tabular form, the quantity and type of growth that is expected to come forward in the different parts of the District.</p>	<p>Yes, the Council would like to include a spatial development policy as suggested by the Inspector.</p>
<p><b>Q.6</b> The Plan proposes the release of lands from the Green Belt for development in the Plan period. The Plan and its underpinning evidence including the Green Belt Topic Paper (examination document ED2) refer to the exceptional circumstances that are necessary to justify changes to the Green Belt boundary through the Plan. Table 1 of the Site Selection Paper (submission document SSP01), summarises the findings of the site selection process, including the scoring of potential sites on a range of factors, including their importance for the Green Belt where relevant.</p> <p><b>Q.7</b> Nonetheless, while the elements of the necessary evidence may be in place, I have not found a comprehensive, integrated and consistent level of explanation of the local-level, site-specific exceptional circumstances that, in the Council's view, justify the release of each individual site. This explanation should summarise the purposes that each individual site serves in the Green Belt, the effect of its release on these purposes and the overall integrity of the Green</p>	<p>Yes, the Council will produce this additional document. Timescales to be confirmed.</p>

<p>Belt, and the other relevant factors in each case that, cumulatively, may amount to exceptional circumstances justifying its release. It will be helpful if the Council can produce a focused, concise document that draws together these elements of the evidence.</p>	
<p><b>Q.8</b> The indicative timing of proposed development is generally not made clear in the Plan. The Council should consider how best to address this, so that the Plan indicates as far as possible when sites are expected to be developed. Also, it should be clear about any proposed allocations where the timing of development will be dependent on provision of key infrastructure.</p>	<p>It is proposed to add an additional column to the site tables at the start of chapters 30,31,32,33,34 &amp; 36 setting out the 5 year period of the plan when development is expected to come forward e.g. 2016-21, 2021-26, 2026-31 &amp; 2031-36. This will also then help to explain why some allocations do not have site specific policies as they have already been developed out. Further details of the indicative timing will also be shown in the detailed housing trajectory in the housing land supply report. There are no specific allocations which are dependant upon key infrastructure being provided. The two strategic allocations at Lea Castle and the Kidderminster Eastern Extension have community facilities factored in for provision in the initial phases of the build. This information can be provided by mid-September.</p>
<p><b>Q.9</b> I understand that the Council is currently updating its 5-year housing land supply position. For the purposes of the examination, a detailed housing land supply trajectory will be necessary, setting out the expected annual housing completions from each of the allocated sites and from the other identified sources of housing supply, including any contributions to the supply from the provision of Class C2 older people's accommodation.</p>	<p>A detailed housing trajectory setting out expected annual housing completions on the allocated sites and other sources of supply will be provided by mid-September. This will also include C2 provision in care homes. An engagement statement will also be provided detailing correspondence with landowners/agents/developers of the main sites.</p>
<p><b>Q.17</b> Regarding the final sentence of paragraph 18.6 of the Plan about viability evidence, the Council should consider the implications of the recent legal judgement in the case of Holborn Studios Ltd and</p>	<p>If the Inspector thinks the final sentence of paragraph 18.6 of the Plan should be deleted,</p>

<p>the London Borough of Hackney ([2020] EWHC 1509) and whether, in this light, it wishes to put forward an amendment of the Plan.</p>	<p>then the Council would agree to this change being made to the Plan.</p>
<p><b>Q.18</b> The evidence of need for accommodation for Gypsies, Travellers and Travelling Showpeople is dated November 2014 and it requires updating. It is understood from the Equalities Impact Assessment (SD14) that an updated assessment of needs is to be carried out, but the timescale for its completion and the way in which the Council proposes to address any unmet need in the Plan should be clarified as soon as possible. Also, with reference to Table 8.0.4 of the Plan, any application of a turnover rate in estimating the level of need will require justification, and the Plan should address how the housing needs of non-nomadic Gypsies and Travellers will be met.</p>	<p>Yes, this work is already being produced. The Council had hoped it would be available by now but Covid-19 has caused delay. The Council intends to submit this to the Inspector by mid-September.</p>
<p><b>Q.19</b> In the light of the Housing Act 2016, can the Council also explain how the needs of houseboat dwellers and caravan dwellers will be addressed through the Plan, as required?</p>	<p>The Housing Need Study (2018) in paragraph 4.9 states: <i>“Other property types include HMO properties, caravans and houseboats. Across Wyre Forest these account for 2.6% of dwellings but in Bewdley &amp; Rock the proportion is 10.7%.”</i> No bespoke assessments have been carried out (other than for G&amp;T). Does the Inspector have any suggestions?</p>

**Appendix 1: Northern extension of Stour Valley Country Park**

