

Wyre Forest District Local Plan 2016-2036

Green Belt Topic Paper

June 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

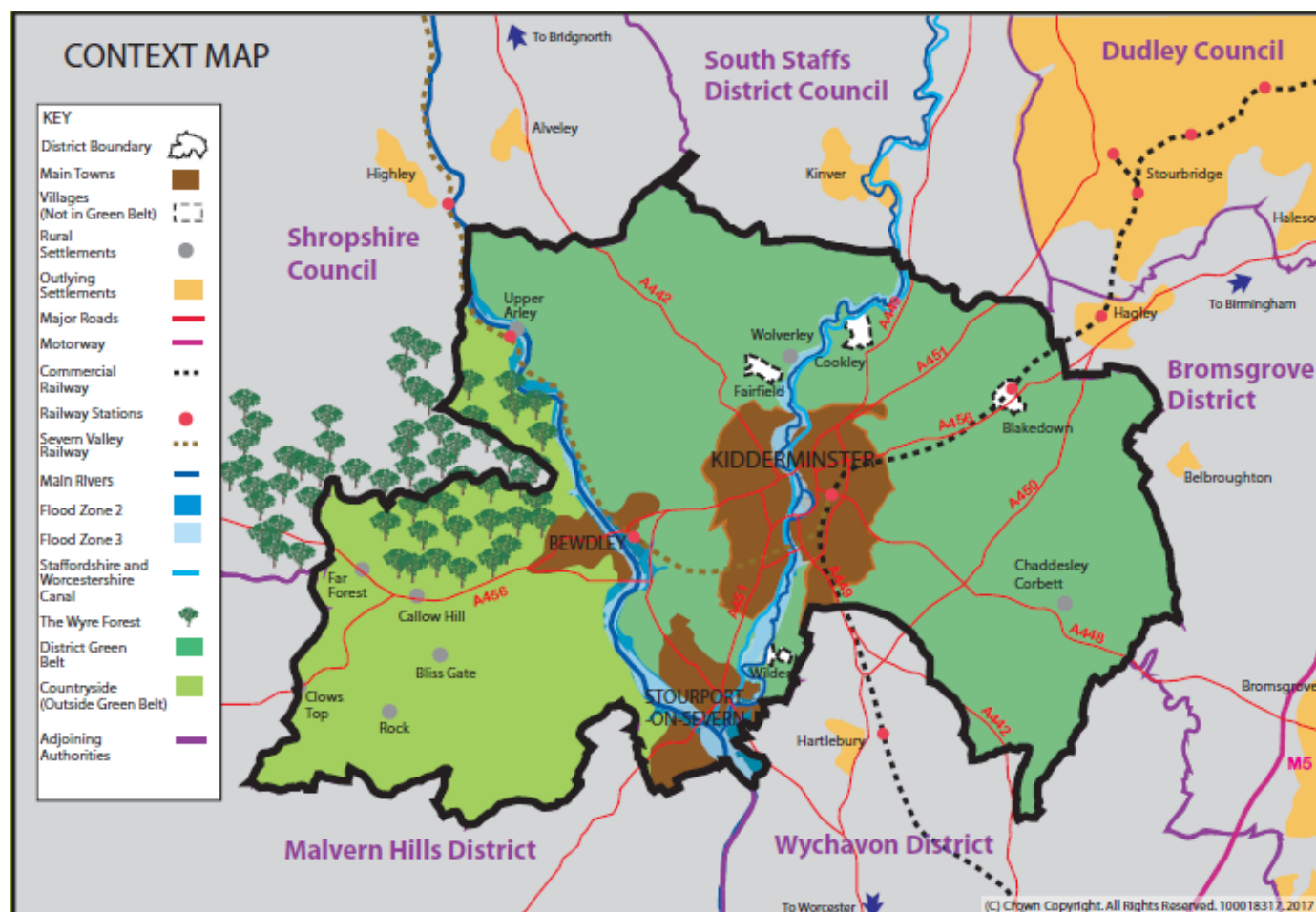


Source: WFDC Green Belt Review – Strategic Analysis (Sept 2016), Amec Foster Wheeler

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 covered by 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 loss of Green Belt which amounts to 2.1% of the current Green Belt. 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 rest 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 places 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 that 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 ‘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 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 consultant's 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>

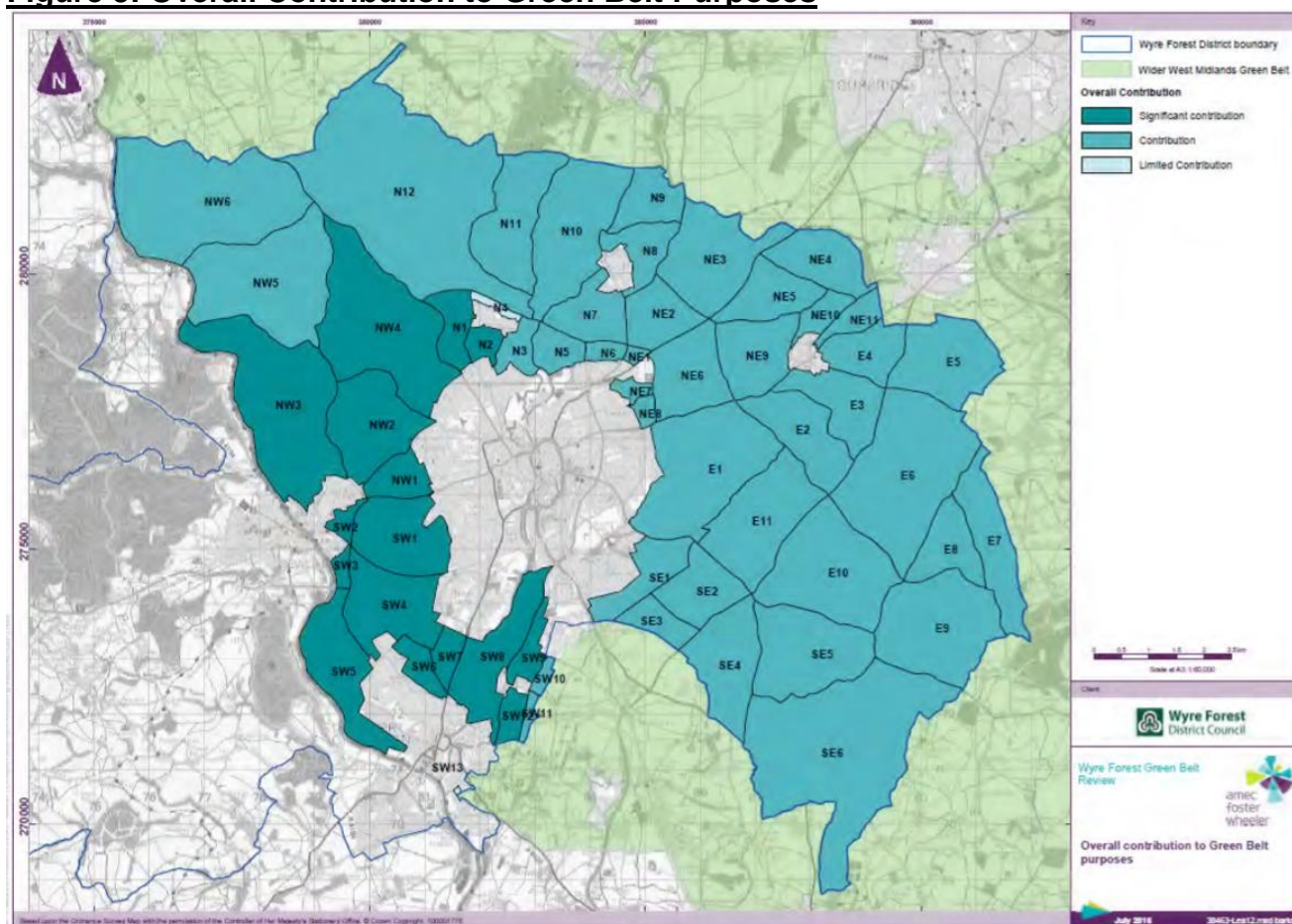
4.4 Part 1 of the GB review is principally a strategic review of the Green Belt purposes, which includes an exploration of the character and role of the villages within the Green Belt, drawing conclusions on the suitability for the continued potential in-setting of villages within the Green Belt, as 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, has 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, in that 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. Proposed changes to the Wyre Forest District Green Belt

6.1 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.

6.2 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	E		2.53	Y

	Park, Worcester Road				
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 Lodge Nursery	H	10	0.8	Y
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	H	35	1.71	Y

	of Habberley Road				
Rural Wyre Forest					
WFR/CB/3	Land off Station Drive, Blakedown	CP/H	50	2.74	Y

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

6.3 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.

6.4 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,	H	4	0.84	N

	Caunsall				
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6.5 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.

6.6 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.

6.7 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.

7. Duty to Co-operate

7.1 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.

7.2 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).

7.3 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.

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 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.

8.4 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. Existing urban areas and non-Green Belt land has been considered, but existing Green Belt land is required to meet the District's housing needs, including identified needs for affordable housing, in sustainable locations.

8.5 The District's tight 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.

8.6 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.

8.7 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.

8.8 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 considered to be the most sustainable settlement and has been identified as the main focus for future development.

8.9 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.

8.10 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 and growth is more limited.

8.11 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.

8.12 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.

8.13 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”*. Therefore, 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.

8.14 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. This therefore constitutes exceptional circumstances.

Reserved Housing Sites in the Green Belt

8.15 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).

8.16 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”*.

8.17 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.

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).

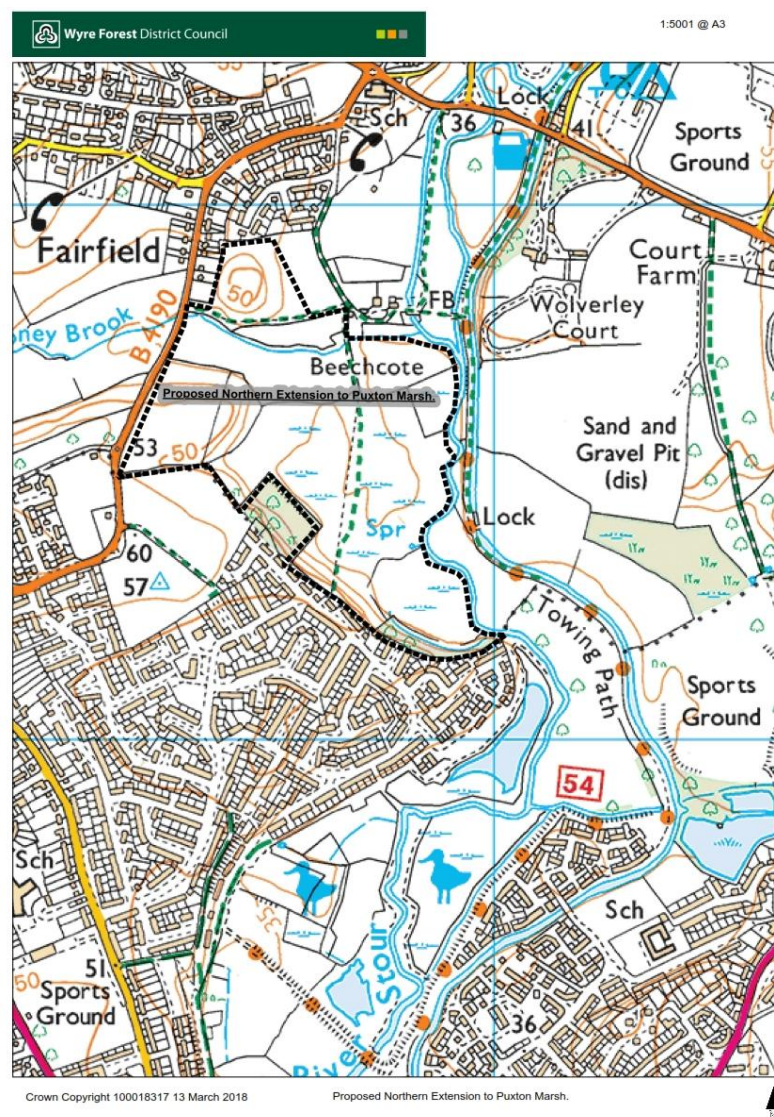
9.4 Since its initial conception, areas of the country park have been assembled as opportunities presented themselves. Puxton Marsh was the first area of land to be added to the country park portfolio. This land was acquired through a Section 106 agreement in 1997. Stourvale wetland was then acquired 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 beautiful 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 fantastic resource to the people of Kidderminster and safeguarding an ecologically important resource for the future.

Figure 4: Northern extension for 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.