

## Technical note:

# Wyre Forest Local Plan Examination: Matter 4 – response to email to the Inspector from Barberry Developments (02/02/21) on the matter of 'coalescence' between Kidderminster and Cookley

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## 1. The 'Complaint'

The following issues have been raised by Barberry Developments in respect of the analysis of the Wyre Forest Green Belt Review:

*"We are acutely aware that there has been quite a gap between the end of Matter 4 and the reference the council gave at the very end of the session that the cumulative effects on the Green Belt for Lea Castle had been done in the Stage 1 Green Belt Report. Having slept on this we realised that this was not accurate and reviewed their evidence again.*

*In the Stage 1 Strategic GB Review, the Inspector will see that this is only an assessment of the contribution the Lea Castle (NE2) site makes to the Green Belt. It is not an assessment of the development proposals (and their cumulative effects) which was one of the stated and defined 3 key objectives for the Stage 2 GB report - to inform site selection decision making.*

*The Councils previous, scrambled reasoning that this was done in the Sustainability Assessment in 2019, 1 year later, does not hold for two reasons. One, it merely states a high impact, and does not state what the cumulative effects on the 5 purposes on the GB are, and; two, this assessment of cumulative effects of the development proposals (which were known at this time) should have been done in the Stage 2 Green Belt Report, informing decision making on site selection, and it was not.*

*The table referencing NE2's contribution to the 5 purposes of the Green Belt is in Appendix B3 pages 128-130 of the Stage 1 Report. It may be useful for the Inspector to note that under 'The role of preventing neighbouring Towns from merging' it erroneously states that NE2 makes a 'limited contribution' as it is not between towns but then goes onto to say, 'although locally this part of land separates Cookley and Kidderminster'. The reason it is given a limited contribution grade is only because Cookley is a village not a town. So we would suggest that Ms Stones assertion that Lea Castle does not cause the coalescence of Kidderminster with Cookley is both inaccurate and an unsound planning judgement."*

## 2. The Response

1. The Stage 1 Green Belt Review assesses merger in respect of the strategic Green Belt purposes set out in the NPPF, concluding that there was an overall Limited Contribution, although the local contribution was noted. On this basis there is no strategic coalescence. The NPPF makes no reference to the coalescence of settlements which are not classified as towns.

2. The Green Belt assessment was undertaken without knowledge of which sites, or parts of sites, might be selected for development, hence the use of conditional terms, as follows:

**“LIMITED CONTRIBUTION**

*Development of the current built footprint of the site would not contribute to the coalescence of towns, but locally would be part of contiguous development between Kidderminster and Cookley should land to the south of Park Gate Road be brought forward for development. However, the visual containment of the site would lessen this impression.”*

*“Whilst the site is detached from the urban edge of Kidderminster it is previously developed and redevelopment would constitute efficient use of land. The site is of a scale that could entail green infrastructure enhancements, particularly in combination with development across Park Gate Road adjoining the built edge of Kidderminster.” Appendix C p.8*

3. The following assertion made by Barberry is incorrect:

*“In the Stage 1 Strategic GB Review, the Inspector will see that this is only an assessment of the contribution the Lea Castle (NE2) site makes to the Green Belt. It is not an assessment of the development proposals (and their cumulative effects) which was one of the stated and defined 3 key objectives for the Stage 2 GB report - to inform site selection decision making.”*

There is no reference in the Green Belt review to the assessment of cumulative effects as an objective.

4. The following criticism by Barberry is misplaced:

*“The table referencing NE2’s contribution to the 5 purposes of the Green Belt is in Appendix B3 pages 128-130 of the Stage 1 Report. It may be useful for the Inspector to note that under ‘The role of preventing neighbouring Towns from merging’ it erroneously states that NE2 makes a ‘limited contribution’ as it is not between towns but then goes onto to say, ‘although locally this part of land separates Cookley and Kidderminster’. The reason it is given a limited contribution grade is only because Cookley is a village not a town”.*

The reason given for the Limited Contribution rating is correct in relation to national Green Belt purposes i.e. the reference point for Green Belt study. There is no reference in national Green Belt policy concerning the separation of towns and adjacent villages or hamlets. As proposed, development would not result in the physical coalescence of Kidderminster and Cookley, despite being part of land which separates them. Barberry does not take the trouble to define their terms, in particular the condition of coalescence.

5. As proposed, the Lea Castle development is physically separated from Kidderminster, by the A449 and a field to the north of the A449 as illustrated below in the extract from the Green Belt Review (Part 2 Appendix C).



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- 6. As noted above, there will be no physical coalescence, either of Cookley with Kidderminster or between Lea Castle and Cookley. The A449 forms a substantial division between the proposed Lea Castle Village and Cookley, which, combined with topography and mature vegetation, will maintain the sense of separate and local identity. In addition, the current edge of Cookley is set back from the A449, maintaining separation from existing and proposed development across the A449.
- 7. Cookley village is situated on a west-facing slope and has limited visual connection with land to the east of the A449. Detailed analysis through a Landscape and Visual Assessment would confirm this.
- 8. In light of the above, the following assertion by Barberry is misplaced on both counts:

*“So we would suggest that Ms Stones assertion that Lea Castle does not cause the coalescence of Kidderminster with Cookley is both inaccurate and an unsound planning judgement”*

**Issued by**

Robert Deanwood

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**Approved by**

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